WEALDEN
HOTEL & VISITOR ACCOMMODATION FUTURES

Final Report - Confidential

Prepared for:
Wealden District Council
Tourism South East

July 2009

hotel solutions
the hotel development consultancy

CONTENTS

APPENDICES

hotel solutions
the hotel development consultancy

Lynn Thomason
Hotel Solutions
Deleanor House
High Street
Coleby
Lincoln
LN5 0AG
t. 01522 811255
e. hotel@tourismsolutions.co.uk

Andrew Keeling
Hotel Solutions
Mill Field House
Mill Fields
Bassingham
Lincoln
LN5 9NP
t. 01522 789702
e. ackeeling@btinternet.com

EXECUTIVE SUMMARY

The Purpose Of The Study

- The Wealden Hotel & Visitor Accommodation Futures Study has been commissioned by Wealden District Council and Tourism South East to provide an objective assessment of the potential for the future development of hotel and other visitor accommodation in Wealden District. The study is one of a series of similar studies that Hotel Solutions has undertaken in 2008/09 for neighbouring local authorities in East Sussex (Lewes, Rother and Eastbourne) and updates the West Kent and East Sussex Accommodation Retention Study undertaken in November 2004 by Tourism Solutions (now part of Hotel Solutions).

- The purpose of the study is to inform the preparation of the Local Development Framework regarding planning policies for the development and retention of the hotel and visitor accommodation sector, as well as to support development control functions in assessing hotel and visitor accommodation planning applications and inform other actions required by the public sector partners to support the development of the sector.

The Potential For Visitor Accommodation Development

- The Hotel & Visitor Accommodation Futures Study provides evidence of strong demand for all forms of visitor accommodation in Wealden at weekends throughout the year and weekdays during the summer months and other school holiday periods, and shortages of all types of accommodation at these times. There is also good potential for further growth in demand for hotel and visitor accommodation in the District from the leisure break, activity tourism, overseas tourist and weddings markets and potential for accommodation businesses to extend their operating season and attract year-round trade. While the primarily leisure-driven nature of hotel and visitor accommodation demand in Wealden may limit the occupancy levels that can be achieved in the District, there is evidence that good quality hotel and accommodation offers can achieve high prices in the District, and good levels of profit and return on investment. If tourism is to develop further in Wealden the development of further good quality visitor accommodation should be encouraged, support given to existing accommodation businesses to improve their product and extend their season, whilst retaining existing accommodation establishments (unless they are incapable of being upgraded or attracting new owners).

- The Wealden Hotel & Visitor Accommodation Futures Study identifies market potential for the following accommodation developments throughout the District (subject to all other material planning considerations):

  - Hotels
    - New country house hotels;
    - New spa hotels;
    - New golf resorts;
    - The development of hotel accommodation linked to wedding and conference venues, including visitor attractions that cater for these markets;
    - The upgrading, expansion and development of existing hotels in terms of additional bedrooms and leisure, spa, conference and banqueting facilities;
    - New budget hotels along the A22 and A27.

  - Pub Accommodation
    - The upgrading and/or expansion of existing pub accommodation operations:
    - The development of new pub accommodation operations through the development of guest bedrooms within and/or adjacent to pubs.

  - Guesthouses and B&Bs
    - The upgrading and/or expansion of existing guesthouses and B&Bs;
    - The establishment and development of new guesthouses and B&Bs.

- Self-Catering Accommodation
  - The conversion of barns and other redundant agricultural buildings to self-catering accommodation, in terms of both individual units and holiday cottage complexes;
  - The development of purpose-built holiday lodges, chalets and log cabins, again both as individual units and in small complexes;
  - The expansion and development of existing holiday cottage complexes in terms of the development of additional units and central leisure facilities and other amenities.
  - The development of lodges and holiday cottages linked to outdoor activities such as golf, fishing and horse-riding.

- Touring caravan & Camping Sites
  - The expansion, development and upgrading of existing touring caravan and camping sites;
  - The development of new touring caravan and camping sites;
  - The development of new luxury camping accommodation products, such as camping pods, yurts and tipis.

- Holiday Parks
  - The expansion, development and upgrading of existing holiday parks;
  - The development of new holiday parks.

- Group and Youth Accommodation
  - The expansion and development of the existing youth hostels in the District;
  - New youth hostels;
  - Children's activity holiday centres;
  - Residential outdoor education centres;
  - Camping/ bunkhouse barns;
  - Residential training/conference/ management centres.

- The above opportunities represent a mixture of new-build developments, conversions and development of existing buildings and upgrading and re-positioning of existing hotel and visitor accommodation establishments. Given the sensitivity of much of the rural landscape in Wealden, and AONB designations, it will clearly be important that hotel and visitor accommodation development projects integrate well with the rural and coastal environment and help support rather than damage the special qualities that make this area of such appeal. Quality is central to this, across the range of accommodation types. Many of the above present the opportunity for low impact sustainable development as well as the potential to bring significant economic and social benefits to local communities and businesses and aid farm diversification.

- The study findings show a clear case for retaining existing hotel and visitor accommodation in the District, other than very poor quality properties that can not feasibly be upgraded to meet modern standards and customer expectations.

The Planning Response

- In planning policy terms, all of the above forms of visitor accommodation should be encouraged and supported as far as possible, subject of course to other planning requirements in terms of scale, environmental impact, access, traffic and both seasonal and holiday occupation.

- At an overall level, the policies in the existing Wealden Local Plan (1998) & Wealden Non Statutory Local Plan (2005) recognise that a balance needs to be met between maintaining and protecting Wealden's natural and built environment and the provision of tourist accommodation and facilities. Since the production of these plans national and regional guidance on the development of tourist accommodation in terms of the DCLG Good Practice Guide, the adoption of the South East Plan, and sector-specific guidance issued by Tourism South East has now evolved. Therefore, any emerging planning policies will need to reflect updated guidance and policies.

- Wealden District Council is currently consulting on its spatial options for its Core Strategy. The Core Strategy is a key component of the Local Development Framework and will set out the Council's long-term spatial vision and the policies that will aid the delivery of that vision. The Core Strategy will therefore help to shape what happens in the District over the next twenty years. Tourism is a factor that features in Wealden's spatial vision in both the 2007 and 2009 Core Strategy consultation documents. However, Wealden District Council is not yet at a sufficiently advanced stage in the LDF process to develop planning policy specifically relating to tourism and the visitor accommodation sector.

- Our assessment of market demand and potential, together with operator consultation, indicate that current policies need to be updated to more fully promote the development of the visitor accommodation sector in Wealden. There is good potential and a clear destination benefit to be secured from further hotel and visitor accommodation development, provided this is delivered in a sustainable way. A more positive planning framework will be required for this potential to be realised.

- In moving forward with the preparation of the Local Development Framework we recommend that future policies for the sector should:

    - Plan for growth;
    - Integrate tourism and planning policy;
    - Recognise the benefits that tourism can bring;
    - Start from a positive place;
    - Reflect good practice and strategic guidance;
    - Match market demand in terms of the desired location of development;
    - Reflect modern holiday-taking patterns and the operational needs of businesses in determining occupancy conditions;
    - Tighten and extend visitor accommodation retention policies;
    - Provide for new accommodation in the countryside as well as extensions and conversions;
    - Be flexible enough to accommodate emerging and innovative tourist accommodation offers;
    - Plan for staff accommodation needs.

- Hotel Solutions believe that policies on hotel and visitor accommodation need to be integrated into the Wealden LDF. This would be in line with the national Good Practice Guide.

Supporting the Sector

- In addition to creating a positive planning framework for tourist accommodation development, there are other actions that Wealden and its partners can undertake to support the development of the sector, including:

    - Increased and improved marketing of Wealden to the domestic leisure break and overseas tourist markets;
    - Business support for new entrants to the accommodation business, including training seminars, information packs and possibly grant aid;
    - The pro-active promotion of accommodation development opportunities via local PR, business support agencies, mailshots and accommodation development workshops;
    - Developing the tourism product of the District to create new reasons to visit and return, in terms of visitor attractions, the activity tourism product and events development.

Monitoring and Review

- The Hotel & Visitor Accommodation Futures Study provides a snapshot in time of sector performance and potential. On-going monitoring of how the sector is developing and performing will be important to establish on-going priorities. This should include regular updating of the supply database and monitoring of planning applications. The Council's on-going Tourism Business Survey should help to monitor performance, supplemented by more in depth study of certain types of accommodation as new supply comes on stream.

Moving Forward - Next Steps

- In moving forward with regard to disseminating and acting on the study findings, the next steps are identified as :

    - Using the study findings to inform the development of relevant LDF and other documents e.g. the update of the Wealden Tourism Strategy;
    - Using the study as a basis for achieving a more consistent and positive approach to hotel and visitor accommodation development in the interim, ahead of the LDF coming into force;
    - Deciding how best to act on the study's recommendations for more proactive support for the development of the hotel and visitor accommodation sector in the District as part of the review and update of the Wealden Tourism Strategy and Action Plan;
    - Deciding whether and how best to release the study finding into the public domain and disseminate them to existing accommodation providers in the District and those that may consider accommodation development projects in the future.

1. INTRODUCTION

1.1 Background to the Study

- The Wealden Hotel & Visitor Accommodation Futures Study has been commissioned by Wealden District Council and Tourism South East to provide an objective assessment of the potential for the future development of hotel and visitor accommodation in Wealden District. The study is one of a series of similar studies that Hotel Solutions has undertaken in 2008/09 for neighbouring local authorities in East Sussex (Lewes, Rother and Eastbourne) and updates the West Kent and East Sussex Accommodation Retention Study undertaken in November 2004 by Tourism Solutions (now part of Hotel Solutions).

1.2 Study Objectives

- The objectives of the study are to assess:

    - The current supply of, and demand for hotel and visitor accommodation in Wealden;
    - The potential for growth in demand for accommodation;
    - The scope for investment in the hotel and visitor accommodation product of the District in terms of new hotels, visitor accommodation businesses and the expansion, development and upgrading of existing hotels and visitor accommodation establishments;
    - The scale of the problem in terms of the loss of accommodation stock and the pressure for residential conversion.

- Specifically the study has sought to:

    - Audit the current supply of hotel and visitor accommodation in the District and identify recent changes in terms of new openings, investment in existing accommodation businesses, recent closures/change of use and firm proposals for new hotels and accommodation businesses.
    - Assess the current demand for visitor accommodation in the District and identify gaps in provision by type of accommodation and location.
    - Assess how the market for visitor accommodation in Wealden might change in the future.

- Establish the market potential for new hotel and visitor accommodation development in the District.
- Identify the types of accommodation operators that might be persuaded to invest in Wealden (ranging from national brands to niche and regional/local operators) and gauge their interest in developing hotels and accommodation businesses in the District.
- Assess the potential for investment in the development and/or upgrading of existing hotels and visitor accommodation establishments.
- Consider accommodation retention issues and recommend best practice in terms of protecting hotel and visitor accommodation against future pressure for residential and other conversion.

1.3 Uses of the Study

- The study findings will be used to:

    - Provide the evidence base to inform the preparation of statutory planning documents for the District (i.e. the Local Development Framework) regarding planning policies for the development of the hotel and visitor accommodation sector.
    - Support development control functions in assessing hotel and visitor accommodation planning applications.
    - Inform other actions needed by the District Council and its partners to support the development of the hotel and visitor accommodation sector in Wealden.

1.4 Scope of the Study

- The study has sought to assess the future development potential of the following types of visitor accommodation in Wealden:

    - Hotels
    - Pub accommodation
    - Guesthouses/B&Bs
    - Self-catering accommodation
    - Touring caravan and camping sites
    - Holiday parks
    - Residential conference centres
    - Group and Youth Accommodation

1.5 Study Methodology

- The study has involved the following modules of research and consultation:

  - A **stakeholder meeting** with the relevant service areas of Wealden District Council (Tourism, Economic Development and Planning).
  - A review of relevant current **policy and strategy** documents to establish the policy framework and strategic support for hotel and visitor accommodation development in Wealden.
  - A review of planning issues surrounding **accommodation retention,** building on the TSE accommodation retention policy guidance for local authorities and the 2004 West Kent and East Sussex Accommodation Retention Study, examining the success or otherwise of current accommodation retention policies.
  - An **audit of current and potential future visitor accommodation supply** in Wealden, identifying any recent changes in the last 3 years in terms of new establishments, extensions, upgrading and closures and any firm proposals for new hotels or accommodation businesses. The audit has been based on information provided by Wealden District Council supplemented by our own Internet searches and site visits to the area. Where discrepancies have been identified establishments have been contacted by telephone to check information.
  - **Interviews with hotel and visitor accommodation managers and owners** in the District and relevant self-catering letting agencies, to gather performance data on occupancy, achieved room rate, market mix, levels of denials, market trends, and development plans. Interviews were conducted through a mix of face-to-face interviews with key hotels and telephone interviews with other accommodation establishments. The hotels and accommodation businesses interviewed are listed at Appendix 1.
  - A **survey of national, regional and local hotel developers/operators** to test developer interest in the District, establish their site and location requirements and identify any obstacles they face relative to investing in Wealden.

1.6 Structure of the Report

- The report comprises chapters on each type of accommodation (listed at 1.4.) setting out the key findings and conclusions of the study regarding:
    - Current supply, recent changes and planned development;
    - Current performance and markets:
    - Future market prospects;
    - Sector development potential
    - Planning policy issues

- The final chapter of the report provides a summary of the planning policy recommendations from the study and identifies other requirements for local authority intervention and support for the hotel and visitor accommodation sector in Wealden.

2. HOTELS

2.1. Current Supply

2.1.1. Current Supply of Hotels

- Our research has identified 17 hotels in Wealden with a total of 587 letting bedrooms. The table overleaf provides an analysis of this supply by standard/type of hotel and location. Appendix 3 provides a full list of the hotels in the District.

- The hotel supply in Wealden is concentrated in the Low Weald area of the District. This area accounts for 57% of the District's total hotel supply. There is very little hotel accommodation in the High Weald and Pevensey Bay, just one small hotel in each of these parts of the District.

- Wealden has a number of very high quality country house hotels (Ashdown Park, Buxted Park, Horsted Place and Stone House) and golf resorts (East Sussex National), particularly in the Uckfield area.

- There are two 3 star hotels at Alfriston and one at Hailsham.

- The District has two budget hotels on the A22 at Hellingly and Polegate.

- There are three small hotels in the South Downs and one in Pevensey, Halland and Magham Down.

- There are no hotels in the market towns of Crowborough, Uckfield, Hailsham, Polegate and Heathfield.

- Aside from the high quality country house hotels and golf resorts the quality of many of the District's other hotels does not appear to be particularly high and some appear to have had little recent investment.

WEALDEN HOTEL SUPPLY – JANUARY 2009

Standard/ Type of Hotel	Ashdown Forest[1]		High Weald		Low Weald		South Downs		Pevensey Bay		Total	
	Hotels	Rooms	Hotels	Rooms	Hotels	Rooms	Hotels	Rooms	Hotels	Rooms	Hotels	Rooms
Luxury Golf Resorts[2]					1	104					1	105
4 Star Country House Hotels	1	108			1	44					2	152
3 Star Country House Hotels					1	20					1	20
Luxury Country House Hotels[2]			1	7							1	7
3 Star					1	47	2	73			3	120
2 Star	1	30			1	20					2	50
Budget					2	92					2	92
Other graded							2	16			2	16
Other non-inspected					1	8	1	8	1	10	3	26
Total Hotels	**2**	**138**	**1**	**7**	**8**	**335**	**5**	**97**	**1**	**10**	**17**	**587**

Notes:

1. Including Crowborough
2. Not inspected

2.1.2. Recent and Proposed Changes in Hotel Supply

a) New Hotels

- New hotels that have opened in Wealden in the last 3 years are as follows:

WEALDEN – NEW HOTELS 2005-2008

Hotel	Location	Standard	No. Rooms	Year Opened
East Sussex National Golf Resort	Uckfield	4 star	104	2006
Premier Inn Eastbourne North	Polegate	Budget	40	2006

- As far as we have been able to establish there are currently no firm plans for new hotels in the District.

b) Hotel Extensions

- As far as we have been able to establish none of the District's existing hotels have added bedrooms or developed new facilities in the last 3 years.

- The following hotels have planning permission for extensions:

WEALDEN – PLANNING PERMISSIONS FOR HOTEL EXTENSIONS – AS AT JANUARY 2009

Hotel	Location	No. Additional Rooms/ Other Facilities	Year Permission Granted
Premier Inn Eastbourne North	Polegate	42	2008
Halland Forge	Halland	25	2005[1]
Crockstead Hotel[2]	Halland	6	2006
Crossways Hotel	Wilmington	14	2007

Notes:

1. Halland Forge made and subsequently withdrew an application for an extension to provide 28 suites and a gym in 2008
2. The Crockstead Hotel is currently closed and up for sale as part of the sale of the Crockstead Equestrian Centre.

- A number of the hotels that we spoke to in the course of our research indicated that they may consider adding bedrooms or developing leisure, spa, conference or banqueting facilities in the future to enable them to satisfy unmet demand and/or to cater and compete more effectively for leisure break, wedding and/or residential conference business.

d) Hotel Closures

- Our research has identified the following hotels that have closed in Wealden in the last 3 years:

WEALDEN – HOTEL CLOSURES 2005-2008

Hotel	Location	Standard	No. Rooms	Year Closed	New Use
White Lodge Country House	Alfriston	3 star	19	2006	Care home
White Friars	Boreham Street	2 star	20	2006	Residential
Hooke Hall	Uckfield	n/a	6	2005	Dwelling for religious sisters

- Deans Place Hotel at Alfriston was granted planning permission for change of use to a residential care home in 2006. As far as we have been able to establish the new owners of the hotel currently have no plans to implement this permission.

- The Boship Farm Hotel at Hailsham was refused permission for change of use to a residential care home and redevelopment for housing in 2007.

- The Priory Court Hotel at Pevensey was refused permission for change of use to residential in 2006.

- The Crockstead Hotel is currently closed and up for sale as part of the sale of the Crockstead Equestrian Centre.

2.1. Current Performance and Markets

2.1.1 Occupancy and Achieved Room Rate

- From the data provided to us by the hotel managers that we interviewed in the District (listed at Appendix 1), average annual room occupancies achieved by Wealden hotels are generally low (most typically around 45%), with very little variation by size, type, standard or location of hotel. One country house hotel that is supported by strong central marketing by its operating company reported high average annual room occupancies (in excess of 75%). The budget hotels in the District also achieve high occupancies (in excess of 75%).

- Country house hotels and golf resorts in the District achieve very high average room rates[1] (well in excess of £100 in most cases).

- We were unable to obtain average room rate data for other hotels in the District.

2.2.2. Weekend Demand

- Weekend occupancies are high (90-100%) for Wealden hotels, with most hotels generally filling on Friday and Saturday nights throughout the year, other than between January and March. Friday occupancies are lower for some hotels. Sunday occupancies are generally very low, although some hotels reported fairly strong Sunday occupancies

- Key weekend markets are as follows:
    - Weddings;
    - Weekend breaks, particularly from London;
    - Golf breaks for golf resorts;
    - Glyndebourne visitors between May and August for hotels in the central and southern parts of the District;
    - Overseas tourists;
    - Walking groups for hotels in the South Downs.

[1] The net amount of rooms revenue per room let that hotels achieve after deduction of VAT, breakfast and meals included in the room price, discounts and commission charges.

- People visiting friends and relatives staying on the holiday parks in Pevensey Bay also generate demand for hotel accommodation in this part of the District.

- The District's country house hotels attract strong demand for weddings . Some attract good demand for exclusive use weddings. There are also a number of other wedding venues in the District that generate good demand for accommodation.

- The District's hotels generally achieve good rates at weekends. Some 3 star hotels drive weekend break business more on rate however through special offers they promote through the Internet or direct to their customer base. Golf break business can be low-rated.

- Our research shows evidence of hotels in the District regularly having to turn business away at weekends, especially in the summer. Weddings held at the District's country house hotels often block out leisure break business for these hotels.

2.2.3. Midweek Demand

- Midweek occupancies are low (typically around 35-50%) for Wealden hotels, although a little higher in the summer months (up to 65-70%). Midweek occupancies for country house hotels fluctuate significantly depending on residential conference business. One country house hotel fills with Glyndebourne visitors during the Glyndebourne season between May and August.

- The main midweek markets for the District's hotels are:

    - Glyndebourne visitors for hotels in the central and southern parts of the District;
    - Midweek breaks;
    - Golf breaks for golf resorts;
    - Overseas tourists;

- Budget hotels and lower priced/quality hotels attract some midweek demand from contractors and workmen working in the area.

- The country house hotels and golf resorts in the District attract residential conferences and team building courses and events during the week, particularly from companies based in London and other parts of the South East.

- There is very little corporate business for hotels in the District from local companies in and around Wealden.

- One country house hotel attracts corporate shooting parties during the winter.

- Hotels in the District rarely deny business during the week. One hotel reported occasionally denying large residential conferences (100 + delegates).

2.2.4. Market Trends

- The East Sussex National Golf Resort has resulted in strong supply-led growth in the residential conference, golf breaks and weddings markets. Other hotels also reported growth in weddings business.

- One hotel reported growth in residential conferences as a result of targeted marketing aimed at London companies. Two hotels reported a downturn in residential conference business however.

- One hotel reported a drop in leisure break business in 2008 as a result of the Credit Crunch. This appears to be a general trend across the UK that has been widely reported in the leisure press.

- One hotel reported a gradual decline in corporate Glyndebourne visitors but an increase in private visitors. This appears to have been a long-term trend, which may have been accelerated by the recession.

2.3. Future Market Prospects

- While there may possibly be a short-term downturn in leisure break demand as a result of the Credit Crunch, in the longer term there is no reason to think that Wealden hotels should not continue to attract strong leisure break demand. The District has a good leisure break product in its countryside and attractions and is ideally placed to attract leisure break business from the London area. Our research shows evidence of leisure break business currently being denied by the District's hotels. The economic downturn and current weakness of sterling against the euro could also provide a boost to leisure break demand in Wealden as more people decide to stay in this country for holidays and breaks.

- Weddings should continue to be a strong market for Wealden hotels. The District has a number of high quality wedding venues, which should continue to attract good weddings business particularly as the population of the District and surrounding parts of the South East expands.

- Wealden hotels are likely to see growth in the overseas tourist market in 2009 as a result of the weakness of sterling against the euro and US dollar.

- Residential conference business could decline in the next few years for the District's country house hotels and golf resorts as a result of the economic climate.

- The Glyndebourne market should remain fairly constant: there are no reasons to suggest that it will either increase or decline.

- Golf tournaments at the East Sussex National could generate increased demand for hotel accommodation in the District if it can successfully secure them.

- There may be some growth in corporate demand in the Hailsham/Polegate area if the plans for developing the Eastbourne/Hailsham Triangle start to deliver new business development and expansion. There may also be growth in corporate demand in the Uckfield area if the Ashdown Business Park is developed, depending on the type of companies it attracts.

2.4. Sector Development Potential

2.4.1. Market Potential

- Our research suggests potential for the further development of high quality hotel products in Wealden that cater primarily for the leisure break, weddings and residential conference markets, both in terms of the upgrading, expansion and further development of existing such hotels and the development of new hotels. These are the strongest markets for hotels in the District. Our research also shows evidence of unsatisfied leisure break demand for the District and potential for growth in weddings demand.

- Hotels in Wealden are unlikely to be able to achieve high occupancies given the lack of corporate demand and the seasonal nature of leisure markets. They can however achieve high average room rates if they offer a quality product.

- Our research suggests market potential for the following types of hotel development project in Wealden:

    - New country house or spa hotels – given suitable properties for conversion;
    - New golf hotels/ resorts;
    - The development of hotel accommodation linked to wedding and conference venues, including visitor attractions that cater for these markets;
    - The upgrading, expansion and development of existing hotels in terms of additional bedrooms and leisure, spa, conference and banqueting facilities – to enable them to meet unsatisfied and increased demand and cater and compete more effectively for leisure break, residential conference and weddings business;
    - The possible development of a further budget hotel on the A27 or A22 in the Hailsham/Polegate area (possibly linked to future business park development);
    - The possible development of a budget hotel on the A22 at Uckfield. Such a hotel is however likely to take business from nearby hotels, pub accommodation businesses and guesthouses/B&Bs.

- There is no clear potential for new hotels in Hailsham, Uckfield and Crowborough town centres due to the lack of corporate demand for hotel accommodation in the towns and their limited appeal for the leisure break market (as identified in the Wealden Tourism Strategy 2004-2009 – 'All Together Better). Crowborough's proximity to Tunbridge Wells and the hotel supply here is also likely to make it difficult to attract new hotel development to the town: hotel developers are more likely to want to be in Tunbridge Wells that Crowborough.

2.4.2. Developer/ Operator Interest

- The largely rural nature of Wealden District and the fact that the main towns are relatively small in size means that the majority of the main branded hotel developers and operators are not targeting the District as part of their site acquisitions drive for new build units. Most would need a minimum population of 50,000-100,000, especially for larger hotel models with 100+ rooms.

- The exceptions to this are the leading budget hotel players. Although they are already represented in the area, they still have outstanding requirements at Hailsham and Uckfield. In both cases a good main road location would be needed, as neither town was seen as offering sufficient corporate or leisure business to support a hotel alone, meaning a need to also cater for passing traffic. With site requirements of 1-1.5 acres for freestanding pub/restaurant and lodge units, it can often be difficult to

  identify a suitable site in a small town centre, or to be able to compete on price. Crowborough was not on the target lists of budget hotel operators, and for one operator was seen as too close to Tunbridge Wells , which was their preferred location. Towns in the District suffer from this in other directions also, with the larger centres of Eastbourne, Brighton and Hastings being the more natural focus for new build hotel development interest.

- There could be interest in new country house hotel development in Wealden. These are destination offers that draw their own market. There are however few national chain players making it difficult to test developer interest for such types of hotel. However, the attractive nature of the area; its potential catchment for short breaks and residential conferences from London and the South East; and the strength of the weddings market in the area, are advantages for this type of product. Development would be dependent upon a suitable property and site becoming available for conversion and development.

- Other interest could come from the independent hotel sector, either from individuals or small regional operators looking at buying existing hotels and re-positioning them, possibly requiring extension to meet modern market expectations. There has been an element of churn in ownership of the District's hotel stock, and although the current climate is not strong for buying and selling hotels, this should come back as economic conditions and the wider market recover.

2.5. Planning Issues

2.5.1. Current Local Plan Policies

- The 1998 Adopted Local Plan has no hotel policy as such in the Tourism Chapter. The supporting text, under the Accommodation section, identifies the need for improvement in the type and range of accommodation and especially a need for further purpose-built budget or mid-range hotels on primary routes in the countryside. The policy for the latter – TR7 - is contained in the Transport section of the Local Plan. There is no hotel retention policy.

- In the 2005 Local Plan Review, the need to resist the loss of visitor accommodation is identified in the text along with facilitating additions and improvements where there is no conflict with the environment. There is not a specific policy encouraging new serviced accommodation development however, though the spirit of the text would direct any new development to the towns and villages. The text refers to the allocated site for budget hotel development at Polegate (A22/A27 interchange), and seeks to resist further new hotel development alongside non-primary roads outside development boundaries. The policy relating to this is again in the Transport chapter, TR4.

- A policy on retention was introduced – TM2 –, which resists loss of serviced accommodation unless a sound economic case is made and demonstrated through factors including effective marketing. However the supporting text for this is light, with no clear explanation of how non-viability and lack of demand should be demonstrated, nor detail of the evidence required e.g. marketing for sale for a minimum period, evidence of cost of up-grading against returns etc. These criteria are not set down in writing anywhere else e.g. an SPD, but rather communicated between applicant and Case Officer. This includes a minimum period of marketing for 6 months with a reputable national agent at a realistic price and submission of accounts.

- The implementation of this policy appears to have been inconsistent, and we suspect that some potentially viable hotel businesses have been lost that it will be difficult to replace e.g. White Lodge at Alfriston. There are others that have permission for change of use, which should they seek to implement, would exacerbate this trend. The weaknesses appear to be:

    - Lack of clear guidance for Case Officers delivering the Development Control role;
    - A lack of expertise in evaluating the change of use case put forward for example to challenge business performance, practices and potential, although there has been an element of support from the District Valuer;
    - A concern that as a non-statutory document, refusal for change of use might not be held up at appeal;
    - The appeal of retained employment use e.g. through conversion to a care home, taking priority over the loss of tourist accommodation.

- The findings of the accommodation retention study undertaken by Tourism Solutions for Wealden, Lewes and Tunbridge Wells in 2004, which articulated an approach to developing retention policy, including detailed criteria and considerations to take into account, do not appear to have been taken on board.

2.5.2. National and Regional Guidance

- National guidance for tourism development was contained in PPG21until its cancellation in September 2006. It has been replaced by a '**Good Practice Guide on Planning for Tourism'.** This document contains a specific appendix on tourist accommodation, dealing principally with the location of accommodation.

- The sections relating to hotels and other forms of visitor accommodation are provided at Appendix 14. In relation to hotels and serviced accommodation, the guidance covers general locational principles and guidance relating to particular types of serviced accommodation (major hotels, budget hotels/lodges, rural/pub accommodation). Some of the key principles include:

    - Identifying suitable locations for hotel accommodation should be an integral part of the plan making process, and should involve the tourist industry.
    - Major hotel developments should look to the town centre first, because of their transport and regeneration implications.
    - Outside the development plan process site selection should follow the sequential approach.
    - There is a need to recognise the market being served by different types of hotel when allocating sites and considering applications, as this will affect the optimum location.
    - In rural areas new build accommodation should preferably be in or adjacent to market towns and villages; the potential to convert rural buildings should also be favourably considered.
    - Scale and impact are key issues in National Parks and AONBs.
    - New hotel developments in historic towns and cities need to be sensitive to their surroundings; conversions may also be a realistic proposition subject to impact.
    - The potential to convert and re-use historic buildings in the town and countryside should be considered.
    - Extensions e.g. to pubs to add bedroom accommodation can help support the viability of these businesses, but need to be proportionate.
    - Budget hotels catering for longer staying markets should generally be destination focused i.e. in town centres.
    - Lodges catering for stop-over traffic may require a location on a major routeway, ideally edge of town rather than in open countryside.

- Regional policies for tourism are set out in the emerging South East Plan, and can be found at Appendix 12. The policy and supporting text includes a number of general principles that local authorities should follow in developing planning policy for the sector (which we pick up on in our planning policy recommendations at the end of this report), but also refers to some specific issues and policies in relation to the hotel sector. In particular that they should:

  - Consider the need for hotel developments to be in the proposed location, including links with the particular location, transport interchange or visitor attraction, and seek measures to increase access by sustainable transport modes.
  - Encourage the extension of hotels where this is required to upgrade the quality of the existing stock to meet changing consumer demands.
  - Include policies to protect the accommodation stock where there is evidence of market demand.

- The emerging South East Plan and its predecessors have identified a number of issues that inform this policy, which in relation to the hotel sector include:

  - Although hotels are ideally suited to town centre locations hotel developers find it difficult to compete with land values in many urban areas;
  - Mixed-use developments may be the only way to achieve town centre hotel development;
  - The exceptions to sequential testing for hotels out of town are country house hotels and provision associated with key transport gateways and regionally significant visitor and sporting attractions, although hotels serving markets that don't need to go into a town centre e.g. one night stop-overs, may also be better located on the outskirts of town.

- Tourism South East has prepared a number of pieces of planning guidance for local authorities focused on the hotel sector. They have drawn on the extensive number of accommodation studies that Tourism South East has partnered, delivered by Hotel Solutions. These are:

    - 'Here to Stay' – Tourist Accommodation Retention and Loss (October 2006)
    - Assessing Change of Use Applications for Small Country Hotels – Addendum to 'Here to Stay?' (October 2007)
    - Attracting Hotel Investment (2004, up-dated 2009).

  A brief summary of each can be found at Appendix 13 and the published documents can be found on the Tourism South East industry website.

2.5.3. LDF Recommendations

a) Hotel Development

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of the types of hotel project that we have identified potential for, subject to all other material planning considerations:

    - New country house hotels
    - New spa hotels;
    - New golf resorts;
    - The development of hotel accommodation linked to wedding and conference venues, including visitor attractions that cater for these markets;
    - The expansion and development of existing hotels in terms of additional bedrooms and leisure, spa, conference and banqueting facilities;
    - New budget hotels along the A22 and A27

- We do not believe that a policy that directs hotel development to the town centres in the District would be appropriate for Wealden for the following reasons:

  - Most of the types of hotel project that we have identified potential for in Wealden could not be accommodated in town centre locations;
  - There is no clear potential for hotel development in the town centres due to the lack of corporate demand and the limited appeal of the towns for leisure breaks;
  - No potential town centre hotel development sites have been identified.

b) Hotel Retention

- Our research supports the case for resisting the loss of hotels in the District to alternative uses other than in cases where hotels are in such a poor condition that new buyers cannot be found and/or investment in upgrading the property would not be commercially viable. Our findings demonstrate that there is a market for good quality, well run and effectively marketed hotels in Wealden, albeit that the leisure driven and seasonal nature of demand limits the occupancies that hotels can achieve in the District.

- Research undertaken in 2007 by Hotel Solutions for Tourism South East[1] showed that there is a market for buying and selling small country hotels in the South East but that there are circumstances when it may be difficult to find a buyer for a very run down hotel. While the hotel property market has declined sharply as a result of the Credit Crunch, current economic climate and downturn in the residential property market, in the longer term there is no reason to think that demand for buying and selling hotels will not recover once finance becomes more available and the economy recovers.

- Stronger policies on hotel retention need to be put in place for the District, with statutory authority, backed up by clear and detailed guidance of the criteria that must be fulfilled to exit from hotel use. These requirements are discussed further in Section 9.1.2. Detailed guidance on the development of hotel retention policies is provided in the TSE 'Here to Stay? guidance and addendum on small country hotels, summarised at Appendix 11 and available in full from the Tourism South East industry website www.visitsoutheastengland.com/site/industry-site .

[1] Assessing Change of Use Applications for Small Country Hotels – Addendum to 'Here to Stay', Tourism South East, October 2007

3. PUB ACCOMMODATION

3.1. Current Supply

3.1.1 Current Supply

- Our research has identified 23 inns and pubs offering accommodation in towns and villages in the District with a total of 189 letting bedrooms. This supply is analysed by standard and location in the table below. A full list of pub accommodation establishments in Wealden is provided at Appendix 3.

WEALDEN PUB ACCOMMODATION SUPPLY – JANUARY 2009

Location	4 star		3 star		2 star		Not inspcted		Total	
	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms
Ashdown Forest[1]			1	21			3	43	4	64
High Weald	1	6					5	19	6	25
Low Weald	1	13	1	6			8	62	10	81
South Downs							2	8	2	8
Pevensey Bay			1	11				132	1	11
TOTAL	**2**	**19**	**3**	**38**			**18**		**23**	**189**

Notes:

1. Including Crowborough

- The District's supply of pub accommodation is split between towns (Forest Row, Crowborough and Hailsham) and villages across the District (Hartfield, Wadhurst, Alfriston, Fletching, Maresfield, Mayfield, Rotherfield, Halland, Horam, Herstmonceux, and Pevensey Bay). There is no pub accommodation currently in Uckfield.

- The standard of accommodation provided by pubs in the District appears to be variable. There are some good examples in the District of pubs that offer high quality bedrooms and good food (e.g. Griffin Inn, Fletching; Best Beech Inn, Wadhurst; The Chequers, Maresfield; Roebuck Inn, Laughton). There are however also a number of pubs that we suspect offer relatively low quality accommodation. Very few pub accommodation establishments are graded under the national accommodation grading scheme.

3.1.2. Recent and Proposed Changes in Pub Accommodation Supply

a) New Openings

- The Roebuck Inn at Laughton opened 5 guest bedrooms in 2007.
- The following pubs in Wealden have planning permission to develop guest bedrooms:

WEALDEN – PLANNING PERMISSIONS FOR NEW PUB ACCOMMODATION – AS AT JANUARY 2009

Pub	Location	No. Rooms	Year Permission Granted
Nutley Arms	Nutley	12	2007
Maidens Head Hotel	Uckfield	6	2007

b) Extensions and Refurbishment

- The Chequers Inn Hotel in Forest Row added 5 bedrooms in 2007.
- The Griffin Inn at Fletching added 5 bedrooms in 2006 through the conversion of an adjacent house.
- The Chequers at Maresfield has undergone major refurbishment in 2007 and 2008 under its new owners.
- The Piltdown Man at Piltdown has planning permission for an additional 4 bedrooms, which it is hoping to develop in 2009.

c) Closures

- The Rock Robin Hotel in Wadhurst closed in 2005 for residential redevelopment.
- The Chequers Inn Hotel in Forest Row has permission for change of use for residential redevelopment.

3.2. Current Performance and Markets

3.2.1. Occupancies and Room Rates

- The performance of pub accommodation establishments in the District varies significantly depending on quality. Pubs that offer high quality guest accommodation and a good quality food offer generally achieve high occupancies (60-70%) and can achieve high room rates. Lower quality pub accommodation operations generally achieve relatively low occupancies and rates however.

- Most of the pub accommodation establishments that we interviewed reported a drop in occupancy in 2008 following growth in 2006 and 2007. 2009 is expected to be a difficult year due to the impact of the Credit Crunch and economic downturn.

3.2.2. Weekend Demand

- Weekend occupancies are generally strong for the District's pub accommodation businesses, especially in the summer months. Most pub accommodation establishments regularly fill on Saturday nights and many achieve high occupancies on Fridays. Friday occupancies are low for some establishments however.

- Key weekend markets are wedding guests, people visiting friends and relatives and overseas tourists. Good quality pub accommodation operations can attract strong leisure break business, particularly from the London market. Other weekend markets are golf, shooting, fishing and walking parties and Glyndebourne visitors for quality establishments in the central and southern part of the District.

- Pub accommodation establishments in the District occasionally deny business at weekends, primarily related to weddings. Some good quality pub accommodation businesses regularly deny significant weekend business during the summer.

3.2.3. Midweek Demand

- Midweek occupancies are generally low (30-50%) for pub accommodation establishments in the District. Midweek demand is stronger in the summer. Some good quality pub accommodation operations achieve high midweek occupancies at this time of year.

- The main source of weekday business for many pubs is contractors and workmen working in the area and overseas tourists. Good quality establishments attract some midweek demand from business visitors and can attract midweek leisure break business.

- Pub accommodation businesses in the District rarely deny midweek business, other than possibly in the peak summer months.

3.3. Sector Development Potential

3.3.1. Market Potential

- Our research suggests that there is market potential for the development of further good quality pub accommodation in Wealden, both in terms of the upgrading and/or expansion of existing pub accommodation operations and the development of good quality guest bedrooms within or adjacent to other pubs in the District.

- There is no reason to suggest that pub accommodation operations in the District should not continue to attract demand from wedding guests and people visiting friends and relatives as these markets grow as the area's population increases.

- Our research, together with the findings of the South East Rural Pub Accommodation Study[1] show that pubs that offer good quality guest bedrooms and a distinctive food offer can trade well in the domestic leisure break and overseas tourist markets and can achieve high room rates from these markets.

- While not a panacea for all pubs, the development of guest accommodation can provide a means of ensuring the long term viability of pubs, particularly given the fall in alcohol sales that many pubs are currently experiencing.

[1] South East rural Pub Accommodation Study, Tourism Solutions, March 2004

- Pub accommodation development provides possibly the best prospect of increasing the supply of visitor accommodation in the District's towns, where hotel development is likely to be difficult to support.

- Pub accommodation businesses in the District may be affected in the future by new budget hotels that could be developed in some locations. Such hotels are likely to compete well with pubs for business from wedding guests, contractors and business visitors.

3.3.2. Developer/ Operator Interest

- Our research has identified a number of pubs in the District that already have planning permission to develop guest bedrooms or to extend their current accommodation offer. Other pubs might be prepared or persuaded to consider accommodation development projects in the future.

- Both Greene King/Old English Inns and Shepherd Neame have properties in the District and whilst they do not have any imminent proposals to extend or up-grade, they are both active in the pub accommodation market and are known to have considered possible developments in Wealden District in the past.

3.4. Planning Issues

3.4.1. Current Local Plan Policies

- There are no specific policies in either the 1998 Adopted Local Plan or the 2005 Non-Statutory Plan relating to the development of pub accommodation. Applications would be considered under a general environment policy (EN27) that covers scale, impact and other design aspects. Each site and scheme is judged on its own merits.

- Clearly there are schemes that have been given approval and implemented. Reasons for refusal have usually related to over-development, highways and access issues or neighbourhood impact/objection. There have been reported incidents of extensions being favoured over free-standing units/buildings albeit associated with pubs, the rationale for which is unclear – possibly a concern about the unit becoming separately/permanently occupied. Presumably this could be controlled with planning conditions.

3.4.2. National and Regional Guidance

- The national Good Practice Guidance on Planning for Tourism does contain a specific recommendation in relation to the development of pub accommodation, identifying that extensions e.g. to pubs to add bedroom accommodation can help support the viability of these businesses, but need to be proportionate. Many of the general principles relating to serviced accommodation identified here and in regional guidance also apply to the pub accommodation sector.

- Tourism South East has undertaken a sector-specific study on rural pubs and the development of accommodation – a summary of this study, 'Rural Pub Accommodation – Unlocking the Tourism Potential', can be found on the TSE industry website at **www.visitsoutheastengland.com/site/industry-site** . One of the outputs of the overall study was guidance on the development of pub accommodation. This document, 'Room at the Inn' – Local Authority Planning Guidance on Developing Rural Pub Accommodation (2004) can also be found on the above website, and is summarised at Appendix 13. The guidance identifies the lack of awareness and understanding by local planning authorities of the potential of the rural pub accommodation sector; the quality of pub accommodation that is now being developed; and the benefits of that such accommodation provides for pubs and tourism development, as being one of the key barriers holding back the development of this type of accommodation.

3.4.3. LDF Recommendations

b) Pub Accommodation Development

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of good quality pub accommodation in the District (subject to all other material planning considerations) in terms of:

    - The upgrading and/or expansion of existing pub accommodation operations:
    - The development of new pub accommodation operations through the development of guest bedrooms within and/or adjacent to pubs.

- The study findings suggest further potential for the development of good quality pub accommodation in the District that would contribute to the development of tourism in Wealden.

- The District Council is encouraged to consider the TSE 'Room at the Inn' guidance (summarised at Appendix 11) in moving forward with its policy formulation in relation to pub accommodation development.

c) Pub Accommodation Retention

- Our research has identified a strong potential market for good quality pub accommodation in Wealden and scope for existing pub accommodation businesses to upgrade and expand. It also identifies that there are a number of poor quality pub accommodation businesses that are not trading well currently. The key issues in considering whether to seek to retain such accommodation therefore will be the quality of the pub and accommodation offer; what potential there could be for these to be improved and further developed; and whether new buyers can be found for such failing pub accommodation operations. Clearly it would not be appropriate to seek to retain all such accommodation if the answers to such questions are negative.

- We would suggest that these applications should be considered against the replacement policy for TM2 as hotels and other forms of serviced accommodation and that pub accommodation be added to the list of accommodation types in the policy.

4. GUESTHOUSE AND B&B ACCOMMODATION

4.1. Current Supply

4.1.1. Current Guesthouse and B&B Supply

- Our research has identified 76 guesthouses, B&Bs and farmhouse B&Bs in Wealden with a total of 204letting bedrooms. These establishments are listed at Appendix 4.

- There is a significant supply of guesthouse and B&B accommodation in the Low Weald, with a good supply of 4 and 5 star guesthouses and B&Bs here. The supply is more limited in the South Downs and High Weald and very limited in Pevensey Bay, although we understand that a number of people provide bed & breakfast accommodation here on a casual basis during the summer.

- 42 (56%) of the District's guesthouses and B&Bs are currently graded. The majority of these establishments are graded as 4 and 5 star. 33 establishments (44% of the total) are not currently inspected. Some of these appear to offer accommodation of a good standard.

WEALDEN GUESTHOUSE & B&B SUPPLY – JANUARY 2009

Location	5 star		4 star		3 star		Not inspcted		Total	
	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms	Estabs	Rooms
Ashdown Forest[1]			6	18	3	6	10	28	19	52
High Weald			8	22			5	13	13	35
Low Weald	6	18	13	37	2	5	10	25	31	85
South Downs	1	5	2	6			7	16	10	27
Pevensey Bay							3	5	3	5
TOTAL	**7**	**23**	**29**	**83**	**5**	**11**	**35**	**87**	**76**	**204**

Notes:

1. Including Crowborough

- There are 5 B&B for Horses[1] establishments in the District (marked with an asterisk in Appendix 2.

[1] Bed and breakfast establishments that also provide stabling and grazing for horses.

4.1.2 Recent Changes in Guesthouse and B&B Supply

- The study has not included a detailed audit of changes in the supply of guesthouses and B&Bs in the District. From our analysis of the Wealden District Council and Tourism South East accommodation stock records, and comparisons with the stock of guesthouses and B&Bs identified in Wealden for the West Kent and East Sussex Accommodation Retention Study in 2004, it is clear that a number of guesthouses and B&Bs in the District have ceased trading in the last 5 years and others have opened. This is typical of the churn factor in this sector of the visitor accommodation market: people generally enter the sector pre-retirement and run a guesthouse or B&B for a period of around 10 years before retiring and either selling up or closing down. This churn of guesthouses and B&Bs is likely to continue to be a feature of this type of visitor accommodation in the District therefore.

4.2. Current Performance and Markets

- Appendix 5 provides the findings of our survey of guesthouse and B&B operators in the District. The key findings are summarised below.

4.2.1. Occupancy

- Guesthouse and B&B occupancies in the District vary significantly depending on the business aspirations of owners. Average annual room occupancies (where recorded) range from 12% for establishments that are operating on a casual basis to up to 85% for some of the better quality and well marketed establishments, although are most typically around 50-60%.

- Guesthouse and B&B occupancies appear to have been largely stable in the last few years. A number of operators reported growth in 2007, but a downturn in 2008 as a result of the Credit Crunch. Many operators expect the overseas tourist market to increase in 2009 as a result of the weakness of sterling.

4.2.2. Weekend Demand

- Weekend demand for guesthouse and B&B accommodation in the district is strong throughout the year, with evidence of consistent and often significant weekend denials in most parts of the District (other than Crowborough), especially during the summer months.

- Weekend markets are:

    - Wedding guests;
    - Weekend break visitors, particularly from London;
    - Overseas tourists;
    - Walkers;
    - People visiting friends and relatives;
    - Glyndebourne visitors, for establishments in the southern and central parts of the District;
    - People visiting friends and relatives staying on the holiday parks in Pevensey Bay.

4.2.3. Midweek Demand

- Midweek demand is weaker and highly seasonal. It peaks in the summer months when some guesthouses and B&Bs reported occasional midweek denials. Midweek occupancies are generally very low in the winter.

- Key midweek markets are:

    - Leisure break visitors;
    - Overseas tourists;
    - Glyndebourne visitors;
    - People visiting friends and relatives staying on the holiday parks in Pevensey Bay.

- There is relatively little demand for guesthouse and B&B accommodation in the District from business visitors and the contractors market.

4.3. Sector Development Potential

- Our research suggests good market potential for the development of further good quality guesthouse and B&B accommodation in terms of:

    - The upgrading and/or expansion of existing guesthouses and B&Bs;
    - The establishment and development of new guesthouses and B&Bs.

- The research shows that guesthouses and B&Bs can trade well in most parts of the District, particularly in terms of attracting business from wedding guests, leisure break visitors and overseas tourists, all of which are markets that offer good long-term growth potential for Wealden. It will also be important to continually encourage the establishment of new guesthouses and B&Bs in the District to replace those that cease trading as their owners retire or move away from the area.

- There could also be scope for further B&B for Horses operations linked to horse riding trails in the District.

- Our research has not identified any clear potential for the provision of further B&B accommodation linked to the Cuckoo Trail. The Trail does not appear to generate demand for overnight stays.

4.3. Planning Issues

4.3.1. Current Local Plan Policies

- As with hotels there are no specific policies relating to the development of new guesthouses and B&Bs in the Local Plan, but guesthouses and B&Bs are covered by the 2005 TM2 policy seeking to retain serviced accommodation. Not all guesthouse and B&B operations will fall within the planning system as some will have permitted development rights. There are no hard and fast rules about the need for planning permission relating to the number of rooms being let. This is something of a grey area. Rather, each case is judged on its own merits, with the proportion of rooms being let in relation to the overall size of the property being more relevant.

4.3.2. National and Regional Guidance

- There are no specific polices relating to guesthouses and bed & breakfasts in the national and regional guidance though the general principles relating to serviced accommodation development will apply.

- Tourism South East published a bed & breakfast sector study in 2004 and a summary of this report – 'Bed & Breakfast Accommodation: Where Now, Where Next and How?' can be found on the Tourism South East industry website www.visitsoutheastengland.com/site/industry-site . The improbability of getting planning permission to expand was one of the top 5 barriers to development of the sector as perceived by operators, so a flexible and positive planning framework clearly has a role to play here. One of the action points for TSE from the study was to encourage local authorities to support the development of new guesthouse and B&B accommodation and the retention of existing stock where demand exists, including incorporating relevant policy in Local Development Frameworks.

4.3.3. LDF Recommendations

a) Guesthouse and B&B Development

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of good quality guesthouse and B&B accommodation in the District (subject to all other material planning considerations) in term of:
  - The upgrading and/or expansion of existing guesthouses and B&Bs;
  - The establishment and development of new guesthouses and B&Bs.

- The research shows that there is strong demand for good quality guesthouse and B&B accommodation in the District that is likely to increase in the future. The further development of the guesthouse and B&B sector in Wealden can thus play an important role in the development of tourism in the District. There will continue to be a 'churn' factor in the sector as people enter and exit it prior to retirement, and a need therefore to continue to encourage new guesthouses and B&Bs to open to replace those that cease trading.

b) Guesthouse and B&B Retention

- We would suggest that there is less of a case for a policy that seeks to retain guesthouses and B&Bs in the District, other than large guesthouses, than there is for hotel and pub accommodation. The majority of guesthouses and B&Bs will be residential properties from which owners decide to operate a guesthouse or B&B business, often as a lifestyle choice pre-retirement or as an additional source of income e.g. to support farming incomes. While owners may invest in upgrading and expanding their accommodation offer they are likely to want to revert to purely residential use once they retire or move away from the area. A stringent guesthouse and B&B retention policy could therefore stifle the development of the sector (as owners may concerned that they would have difficulty in reverting to purely residential use) and is likely to be difficult to enforce without additional staff resources to closely monitor property sales in the District.

5. SELF-CATERING ACOMMODATION

5.1. Current Supply

5.1.1 Current Supply of Self-Catering Accommodation in Wealden

- Our research has identified 107 self-catering operations in Wealden with a total of 139 letting units (listed at Appendix 6).

WEALDEN SELF-CATERING ACCOMMODATION SUPPLY – JANUARY 2009

Location	5 star		4 star		2/3 star		Not inspcted		Total	
	Estabs	Units	Estabs	Units	Estabs	Units	Estabs	Units	Estabs	Units
Ashdown Forest[1]	1	1	9	10	1	11	1	2	12	24
High Weald	3	6	8	12	1	1	6	6	18	25
Low Weald	1	4	19	25	5	6	25	26	50	61
South Downs	1	1	2	4	3	3	11	11	17	19
Pevensey Bay			1	1	1	1	8	8	10	10
TOTAL	**6**	**12**	**39**	**52**	**11**	**22**	**51**	**53**	**107**	**139**

Notes:

1. Including Crowborough

- The Low Weald area has the most significant supply of self-catering accommodation in the District.

- The District's self-catering supply is a mix of residential properties let out for self-catering accommodation and self-catering barn conversions, together with a few purpose-built holiday chalets/ lodges.

- Most of the District's self-catering supply is single units. There a few small holiday cottage complexes in the District (with 2-4 units) and two larger self-catering complexes (one with 6 units and the other with 13 units). Some of the complexes also have swimming pools, games rooms and/or other leisure facilities e.g. a tennis court.

- 90 units (63% of the total) are graded under the national accommodation grading scheme. The majority of these units have achieved a 4 star rating. Wealden also has 6 luxury 5 star self-catering operations, with 12 units, including Bardown Farm at Stonegate, which was the runner-up in the Tourism Excellence Awards Self-Catering Holiday of the Year in 2006.

- The majority of self-catering units in the District sleep 2-4 people. The District also has some large units sleeping 6-8 people but relatively few larger units sleeping 10-12+.

5.1.2. Recent and Planned Changes in Self-Catering Supply

- The study has not involved a comprehensive audit of changes in the supply of self-catering accommodation in Wealden. From our analysis of the Wealden District Council and Tourism South East accommodation stock records, and comparisons with the stock of self-catering accommodation identified in Wealden for the West Kent and East Sussex Accommodation Retention Study in 2004, it is clear that a number of self-catering businesses have ceased trading in the last 5 years and that a significant number of new self-catering operations have started trading, including a number of self-catering barn conversions. Overall there appears to have been a significant increase in the supply of self-catering holiday accommodation in the District.

- From planning lists provided by Wealden District Council there are a significant number of outstanding planning approvals for barn conversions to self-catering holiday cottages that have not yet been implemented. The study has not involved any research to assess the future intentions of the owners of such properties.

5.2. Current Performance and Markets

- Our research shows strong demand for self-catering accommodation in Wealden. Self-catering properties in the District typically let for around 30-40 weeks. Some achieve even higher lettings of around 40-45 weeks. A number achieve lower letting of 16-26 weeks.

- There is strong demand for self-catering accommodation in all parts of the District and for all sizes of unit. Higher quality units generally achieve the highest lettings.

- Demand is strong between April and October and the Christmas and New Year period and February half term. Self-catering properties generally let for 1/2-week holidays at these times of year. Holiday visitors come primarily from the UK although many units also attract good demand from overseas holidaymakers. Other markets at these times of the year are people visiting friends and relatives and people combining attendance at a wedding or other family occasion with a holiday.

- Many self-catering properties in the District are fully booked and regularly turning business away between June and September and over the Christmas and New Year period.

- Outside the peak season there is strong demand for weekend breaks at self-catering properties in the District. Many good quality properties are frequently fully booked and turning business away at weekends. Key markets are weekend breaks and people visiting friends and relatives or attending weddings and family parties. Large properties and holiday cottage complexes attract strong demand from groups of families or friends for special occasions, get-togethers and reunions. Many are booked up for weekends up to a year in advance and regularly have to turn such bookings away.

- Some properties attract midweek leisure breaks, particularly in the spring and autumn.

- A number of self-catering properties take long lets during the winter from people that require temporary accommodation while relocating to the area, house hunting, or while work is being undertaken on their home. These tend to be individual units. Complexes are less interested in such bookings as they can attract strong weekend business from family and friendship groups.

5.3. Future Market Prospects

- The South East Self Catering Sector Review[1] identified positive prospects for growth in the self-catering holiday market in the South East Region, with continuing strong demand for one and two week holidays in the summer months and other school holiday periods and potential for further growth in short break demand in the shoulder months. The trend towards people taking multiple shorter holidays in the UK was identified as a key factor likely to boost the demand for self-catering holidays. The Review identified a need for additional self-catering accommodation in Sussex and a shortage generally in the Region of larger units capable of accommodating groups of families and friends. The Review also highlighted the benefits of leisure facilities such as tennis courts, swimming pools and children's play areas to help sell self-catering properties.

[1] Self-Catering – A Review of Sector Change & Potential in the Tourism South East region, Tourism Solutions, April 2005

- On the basis of our research we see no reason to suggest that demand for self-catering holidays in Wealden should not continue to grow given the development of further self-catering supply in the District.

5.4. Sector Development Potential

5.4.1. Market Potential

- Our research provides clear evidence currently of unmet demand for self-catering accommodation in the District, which can potentially be satisfied given further self-catering provision in the District. This suggests potential for further:

    - Residential properties being let as self-catering accommodation;
    - Self-catering barn conversions;
    - Log cabins, chalet and holiday lodges.

- There would appear to be market potential for both individual units and self-catering complexes and for existing holiday cottage businesses to expand and develop. Complexes of self-catering units would have the added advantage of being able to cater for groups of families and friends at weekends outside the main season, for which our research has identified a shortage or provision currently in the District. They may also be able to support the development of central wet weather and leisure facilities, such as a swimming pool, games room, tennis court or children's play area, and other amenities, such as a laundry.

- There is a shortage of large self-catering properties in the District (and the South East generally) capable of accommodating large groups of families and friends.

- A number of self-catering letting agencies indicated that they are looking for additional properties in East Sussex. Hoseasons, for example, has recently appointed a consultant specifically to recruit properties in Kent and East Sussex.

- There could be scope for fishing lodges to be developed associated with fishing lakes and potential possibly for self-catering accommodation to be developed in association with horse riding stables and horse riding trails. There are already examples of such accommodation in the District.

- There could also be market potential for development of self-catering golf lodges at existing golf resorts and golf courses either for rental, timeshare or outright purchase. Such lodges have successfully been developed on golf courses elsewhere in the country.

5.4.2. Developer/ Operator Interest

- There are a significant number of outstanding planning approvals for self-catering barn conversions in the District that may be implemented in the future. Our research also identified a number of existing self-catering operators that are currently considering plans for further units. Clearly the search for properties from marketing agencies such as Hoseasons also demonstrates further market potential and interest in the area from national operators.

5.5. Planning Issues

5.5.1. Current Local Plan Policies

- The 1998 Adopted Local Plan text recognises demand in the countryside for quality self-catering, for example through the conversion of farm buildings. However there is no policy as such in the Tourism Chapter of the Plan. Countryside policies allow for the conversion of agricultural buildings to tourist accommodation (DC7). The 2005 policy is very similar. Scale, impact, design, appearance and access are all important considerations.

- Holiday cottage planning permissions would normally have occupancy conditions attached to them to ensure holiday use and avoid permanent occupation, most typically a 28-day rule (maximum period of occupancy by one occupant) along with a one-month non-occupation restriction i.e. when the unit is not let at all. It is unclear whether these conditions have been uniformly applied., or whether they vary on a case by case basis.

- The accommodation retention policy does not appear to cover self-catering cottages, referring only to serviced accommodation.

- Residential properties being let for holiday purposes do not need planning permission as this does not involve any material change of use.

- The policies appear to only permit conversion of buildings to self-catering and not new build. There have been some examples where demolition of an unattractive building might be preferable with a new sympathetic building of similar scale/footprint replacing it, and some have been refused, although one case was recently won on appeal.

5.5.2. National and Regional Guidance

- The national guidance relating to holiday, touring caravan and chalet parks covers holiday chalets, caravan holiday homes, pitches for touring caravans, motor homes, camping and all types of self-catering accommodation. The guidance that relates specifically to self-catering accommodation (that is not on caravan or camp sites or holiday parks) refers to advice in PPS7, which indicates that planning authorities should support the provision of other forms of self-catering accommodation in rural areas where this would accord with sustainable development objectives. It also advises that the re-use and conversion of existing non-residential buildings for this purpose may have added benefits e.g. for farm diversification. The guidance also includes a section on seasonal and occupancy conditions advising that these conditions should be applied to ensure the property remains in holiday use and does not become a permanent residential household.

- There is no specific policy relating to self-catering cottages/units i.e. non-caravan/holiday park in the accommodation section of the South East Plan, but the general principles of positively reflecting the diversity of the accommodation sector in planning policy, of guiding the location of development in relation to market requirements, and protecting stock where there is evidence of demand apply.

- Tourism South East has not produced planning guidance for the sector but the 2005 sector study identifies key trends in the market, product development and challenges to the sector. This might be helpful in identifying factors critical to success particularly relating to quality and location in relation to visitor 'attractors', and therefore help in policy formulation.

5.5.3. LDF Recommendations

a) Self-Catering Accommodation Development

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of good quality self-catering accommodation in the District (subject to all other material planning considerations) in terms of:

  - The conversion of barns and other redundant agricultural buildings to self-catering accommodation, in terms of both individual units and holiday cottage complexes;
  - The development of purpose-built holiday lodges, chalets and log cabins, again both as individual units and in small complexes (subject to meeting environmental impact considerations);
  - The expansion and development of existing holiday cottage complexes in terms of the development of additional units and central leisure facilities and other amenities.
  - The development of lodges and holiday cottages linked to outdoor activities such as golf, fishing and horse-riding.

- Proposals for large self-catering properties should be encouraged wherever possible, as holiday cottage letting agencies advise that there is a clear shortage of such properties.

- Our research provides evidence of strong demand for self-catering holidays in Wealden and potential for further self-catering accommodation in the District. The development of further self-catering accommodation would contribute to the development of tourism in the District, can help to support faming incomes and can provide a viable alternative use for redundant agricultural and other buildings

b) Letting Conditions

- The District Council may wish to continue to apply occupancy conditions to approvals for self-catering accommodation in order to ensure that they do not become used for permanent housing. In so doing however care should be taken to ensure that such conditions do not restrict the ability of owners to take holiday, short break or long lets in the winter months. Our research shows that self-catering properties in the District can attract weekend break lets throughout the year, but that there is also demand for long lets in the winter from people requiring temporary accommodation for various reasons e.g. while moving house or working in the area, which owners may feel is more profitable during the winter months when holiday demand is lower. This can help to underpin the financial viability of such units and therefore their long-term sustainability. Letting conditions relating to the use of self-catering accommodation for holiday lets and not residential use would be much more helpful than conditions relating to the period of letting or the duration of lets.

c) Self-catering Accommodation Retention

- Our research suggests that there is a case for resisting the loss of holiday cottages/ barn conversions to residential use where planning permission has been specifically granted for holiday letting, especially in locations where the provision of permanent housing would be contrary to local planning policies and locations with strong visitor t appeal. There is clearly a strong market for holiday cottages in Wealden and no reason why good quality, well-run and effectively marketed holiday cottages should not be able to attract good lettings levels and income. Whilst the study has not involved a detailed assessment of the commercial viability of holiday cottage barn conversions, our research suggests that such developments can be financially viable and support a certain level of borrowings to fund their development, albeit that returns on investment are likely to be relatively low and long-term. There may however be exceptions in cases where conversion costs can be shown to be particularly high for some reason.

6. TOURING CARAVAN & CAMPING

6.1. Current Supply

6.1.1. Current Supply of Touring Caravan and Camping Sites in Wealden

- Our research has identified 19 touring caravan and camping sites in Wealden with a total of 916 pitches (listed at Appendix 7) and a further 4 camp sites with a total of 77 pitches (listed at Appendix 8) A number of holiday parks* in the District also have a small number of touring caravan and camping pitches.

WEALDEN TOURING CARAVAN & CAMPSITE SUPPLY – JANUARY 2009

Location	4 star		3 star		Not inspected		Certificated[2]		Total	
	Sites	Pitches	Sites	Pitches	Sites	Pitches	Sites	Pitches	Sites	Pitches
Ashdown Forest[1]	1	90			2	70	1	5	4	165
High Weald					2	37			2	37
Low Weald	1	90	1	22	6	184	3	15	11	311
South Downs					2	50			2	50
Pevensey Bay	1	200	2	155	1	75			4	430
TOTAL	**3**	**380**	**3**	**177**	**13**	**416**	**4**	**20**	**23**	**993**

Notes:

1. Including Crowborough
2. 5 van sites certificated by the Caravan Club or Camping & Caravanning Club

- Pevensey Bay has the largest supply of touring caravan and camping pitches in the District with 4 large sites at Pevensey Bay, Westham and Normans Bay.

- Low Weald has 10 sites, including two large sites at Horam and East Hoathly, a number of small sites and 3 Camping and Caravanning Club certificated sites (for 5 caravans).

- There are 4 sites serving Ashdown Forest, including the Camping and Caravanning Club Sites at Crowborough (90 pitches), two small sites and a certificated site at Hartfield.

* Holiday parks that primarily provide accommodation in static caravans, holiday chalets or holiday lodges for sale or to rent.

- There are only two sites in High Weald and only one campsite in the South Downs, with no provision currently for touring caravans in this part of the District.

- The Camping and Caravanning Club has two sites in the District at Crowborough (90 pitches) and Normans Bay (200 pitches). The Caravan Club has a site at East Hoathly (76 pitches).

6.1.2. Changes in Supply

- Hidden Spring Vineyard at Horam has expanded its certificated caravan site in 2008 to now provide 10 touring caravan pitches and 10 tent pitches. It is currently developing two yurts for hire from 2009.

- Castle View Caravan Site at Pevensey Bay is currently in the process of applying for planning permission to convert to a static caravan site.

- Planning permission was granted in 2008 for 6 Feather Down Farm luxury tented accommodation units at Sunninglye Farm at Bells Yew Green near Tunbridge Wells. This a concept that has been operated in the UK since 2005 by the Feather Down Farm Days company as a seasonal luxury camping holiday option. The concept involves Feather Down Farm Days providing working farms with 5-10 fully-equipped Feather Down tents for erection between Easter and October. The tents provide spacious, ready-to-use camping accommodation including beds, bedding, a toilet, wood-burning cooking stove, cool chest and cooking equipment. The farmer is responsible for providing a cold water supply to each tent and connection to a mains sewer or septic tank, together with the provision of a communal hot shower facility. Feather Down Farm Days runs a national marketing, advertising and PR campaign and provides a central booking system.

6.2. Current Performance and Markets

- As part of the Hotel & Visitor Accommodation Futures Study, Hotel Solutions undertook a telephone survey of the operators of touring caravan and camping sites in the District. Nine operators were interviewed (listed at Appendix 1).

- The findings of this survey show that touring caravan and camping sites in Wealden are currently performing well, with a number of sites reporting increasing pitch occupancies in recent years. Demand is highly seasonal and weather dependent. Weekend demand is strong, particularly in the summer. Most sites turn away significant levels of business at weekends during the summer and on Bank Holiday weekends: some operators reported that they could easily fill two or three times over at such times. Weekend demand is also strong in the spring and autumn, particularly if the weather is good, although sites in the District generally still have some spare capacity at weekends during these times of year.

- Most touring caravan and camping sites in the District achieve good midweek pitch occupancies during the peak summer months, although most sites usually have availability and rarely deny midweek business at such times of year. Midweek pitch occupancies are lower in the spring and autumn.

- The main market for touring caravan and camping sites in the District is leisure breaks, predominantly from London and the South East. Secondary markets are European holidaymakers (primarily from Germany, the Netherlands and France), walkers and cyclists and people attending events.

- Our research identified potential latent demand for seasonal tourer pitches in Wealden i.e. where people leave their touring caravan on a site for the season to use at weekends and for holidays. Touring sites in the District are currently prevented from trying to attract this market however, due to restrictions on the maximum number of days (28) that pitches can be occupied by a caravan.

6.3. Sector Development Potential

6.3.1. Market Potential

- Two recent reports on the UK camping and caravanning sector give different views about the prospects for growth in the market for camping and caravanning holidays in the UK. A report produced for VisitBritain Insights in 2008[1] shows significant growth in the UK market over the last 10 years and suggests continued strong growth in the market in the future citing the following factors as evidence of these trends and potential future growth:

    - Strong growth in membership of the Caravan Club and Camping and Caravanning Club;
    - Increasing sales of touring caravans, motor homes and tents;
    - A more positive, 'cool' image for camping, with improvements in the quality of tents and camping equipment and the development of new luxury camping concepts, such as ready-pitched luxury camps, camping pods[2], yurts[3], tipis and wigwams, and the Feather Down Farm concept[4];
    - The growth in outdoor activities.

- A recent Mintel report on the sector[5] however shows a decline in the total number of UK residents taking camping and caravanning holidays in the UK and projects a further decline over the next 5 years, citing competition from self-catering holidays and overseas breaks as the key factors behind this decline.

- Our research shows clear evidence of a shortage of touring caravan and tent pitches in Wealden at weekends during the peak summer months and Bank Holiday weekends. This suggests scope for supply-led growth in the caravanning and camping market in the District if existing sites expand and/or new sites are developed. Demand for caravanning and camping should also increase as tourism and outdoor

---

[1] The Value of Camping and Caravanning to Local Communities, VisitBritain Insights, January 2008

[2] Camping pods are a new form of visitor accommodation that is rapidly developing in the UK. They are effectively wooden shelters that provide sleeping accommodation for up to four people, avoiding the need for them to bring/carry a tent with them.

[3] Yurts, based on the Mongolian yurt, are wooden frame, insulated circular tents that are usually furnished with beds, wood burning stoves and kitchen equipment.

[4] Feather Down Farms comprise 5-10 seasonally erected tents on working farms that are equipped with beds, bedding, cool chests, cooking equipment and wood burning stoves, with fully connected toilets and water supply and communal shower facilities.

[5] Camping and Caravanning Holidays, Leisure Intelligence, Mintel, August 2007

activities develop in the District. The establishment of the South Downs National Park is likely to boost demand in this part of the District. Demand from European markets could increase in the next few years if sterling remains weak against the euro. Demand will remain highly seasonal and weather dependent. Growth in motor home use and improvements in the quality and specification or touring caravans are helping to extend the season however.

- Our research has also identified potential latent demand for seasonal tourer pitches in the District.

- There could also be market potential in Wealden for the development of some of the luxury camping accommodation offers that are starting to emerge in the UK.

6.3.2. Developer/ Operator Interest

- A number of the operators of touring caravan and camping sites that we spoke to in the District indicated that they have plans to further develop their site that they may seek to progress in the future in terms of:

    - Additional pitches;
    - Extending their opening period, in some cases to year-round operation;
    - New hard standings for touring caravans and motor homes;
    - New shower and toilet blocks;
    - Leisure and catering facilities;
    - Improved access and facilities for disabled people;
    - Permanent on-site accommodation for site managers for the purposes of site operation during the season and site security and maintenance in the winter.

- There have also been a number of planning applications for new touring caravan and camping sites, indicating a latent demand for new sites if the planning framework was to permit them - the planning status indicates a mix of approvals, refusals and withdrawals. The Caravan Club indicated that they would consider a further site in this area, and would prefer to develop a new site rather than extend one of their existing sites in order to give their members more choice and to avoid sites becoming too large.

6.4. Planning Issues

6.4.1. Current Local Plan Policies

- Policies relating to touring caravan and camping are contained in the 1998 Adopted Local Plan under TM6, TM7 and TM8. The text anticipates a growing demand for touring caravanning and camping. The policies resist new touring sites in Ashdown Forest as unacceptably damaging in an open and unspoilt landscape area. Proposals for touring sites will also be resisted in the Sussex Downs AONB and the Coastal Levels, although small sites for lightweight tents may be permitted. Extensions to sites allowing for better layout and landscaping may also be permitted. Outside these areas proposals for new and extended touring caravan and camping sites will be permitted subject to meeting certain criteria relating to access, scale, visual impact and landscaping.

- In the 2005 Non-Statutory Local Plan, policy TM4 permits new or extended touring caravan and camping facilities subject to conditions as above and with similar restrictions relating to the Sussex Downs AONB, Coastal levels and Ashdown Forest. The Low and High Weald are identified as locations to encourage new sites. A new policy, TM3, resists the change of use of touring pitches to static pitches.

- In neither document is there a retention policy that prevents change of use of touring caravan and camp sites other than the above.

- Seasonal and occupancy conditions are normally attached to planning permissions for touring caravan and camping sites. These conditions limit the number of nights any individual caravan or tent can stay on the site, usually to 28 days. Other conditions may be attached to exclude static caravans. Winter closure may also be a condition of planning.

- A number of operators indicated that they had had schemes refused or discouraged, although it is difficult to ascertain whether these were on policy grounds or specific issues relating to the site and/or impact of the proposed project.

6.4.2. National and Regional Guidance

- The Good Practice Guidance relating to holiday, touring caravan and chalet parks covers holiday chalets, caravan holiday homes, pitches for touring caravans, motor homes, camping and all types of self-catering accommodation. Some of the key points include:

    - The need for facilities should be carefully weighed against landscape protection.
    - Where possible visually intrusive sites and sites in flood risk areas should be re-located.
    - Planners should work with operators to improve the attractiveness of sites.
    - New sites are better located close to existing settlements and services.
    - Economic benefits as well as environmental impacts of developments should be considered.
    - Whilst occupancy conditions are a useful tool to prevent permanent occupation (more detailed guidance is provided on this), planners should be sympathetic to extended opening periods with trends towards year round activity.

    - Staff accommodation may be required on site, ideally using existing buildings/conversions, but accepting there may be a need for new residential development tied to the business.
    - More detailed guidance can be found in PPS7.

- The South East Plan policy on tourist accommodation has a specific point on unserviced accommodation, encouraging local authorities to facilitate their up-grading and enhancement, including extensions and to encourage the use of the accommodation year round for holiday purposes.

6.4.3. LDF Recommendations

a) The Development of Touring Caravan and Camping Sites

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of touring caravan and camping accommodation in the District (subject to all other material planning considerations) in terms of:

    - The expansion, development and upgrading of existing touring caravan and camping sites;
    - The use of touring pitches for seasonal tourers;
    - The development of new touring caravan and camping sites;
    - The development of new luxury camping accommodation products, such as camping pods, yurts and tipis.

- Our research suggests market potential for further touring caravan and camping provision in all parts of the District.

- In terms of policies regarding the development of existing sites, these should include provision for the development of shower and toilet blocks, hard standings for touring caravans and motor homes, leisure and catering facilities, improvements and facilities for disabled people, and improved landscaping. Positive consideration should also be given to permanent on-site accommodation for site managers, particularly in the interests of site security in the winter and to support year-round operation of sites.

- Our research also shows a need to allow sites to operate on a year-round basis if they wish to. While many sites will only want to operate on a seasonal basis, there are operators in the District that see scope to attract business during the winter months, particularly with the growth in demand for short breaks and the improved quality and specification of touring caravans and motor homes.

- Our research shows potential latent demand for seasonal tourer pitches in the District, which site operators are currently prevented from attracting due to restrictions on pitch occupancy duration. The District Council will thus need to consider whether specific policies are needed that would permit such pitches, subject to conditions that would prevent permanent residential.

b) The Retention of Touring Caravan and Camping Sites

- Our research suggests that the District Council should consider an explicit policy to resist the loss of touring caravan and camping sites to other uses, including conversion to static caravan sites, other than possibly allowing a few static caravans on touring sites (subject to other planning considerations being satisfied) and in exceptional cases where conversion to a static caravan site would result in an enhanced accommodation offer and/or ensure continued tourist use of a site. Our research has identified a strong market for touring caravanning and camping in the District and a shortage of provision for this type of accommodation during summer weekends, school holiday periods and other Bank Holiday weekends in most parts of the District, other than possibly Pevensey Bay. The loss of existing sites will thus further exacerbate these shortages and should thus largely be resisted. We see no reason however why touring sites should not be permitted to convert a few pitches to use for static caravans, provided that environmental considerations can be fully satisfied and the predominant use of the site remains for touring caravanning and camping: static caravans can help sites to achieve a longer operating season and can deliver guaranteed income, thus helping to support the viability of touring sites.

7. HOLIDAY PARKS[1]

7.1. Current Supply

7.1.1. Current Supply of Holiday Parks in Wealden

- Our research has identified 9 holiday parks in Wealden (listed at Appendix 9), with a total of 652 owned units, 39 units for hire and 42 touring pitches.

WEALDEN HOLIDAY PARK SUPPLY – JANUARY 2009

Location	5 star		4 star		3 star		Not Inspected		Total	
	Sites	Units	Sites	Units	Sites	Units	Sites	Units	Sites	Units
Ashdown Forest[1]										
High Weald							1	51	1	51
Low Weald	1	63	1	18			2	22	4	103
South Downs										
Pevensey Bay							4	537	4	537
TOTAL	**1**	**63**	**1**	**18**			**7**	**610**	**9**	**691**

Notes:
1. Including Crowborough

- This supply is concentrated in Pevensey Bay, where there are 3 large holiday parks and one smaller operation, with a total of 537 units, accounting for 78% of the District's total supply of this type of accommodation.

- The majority of units on the District's holiday parks are static caravans. Glyndley Manor Cottages at Stone Cross is the District's only complex of purpose-built holiday homes.

- Martello Beach is a large holiday park with a swimming pool, fitness suite, bar and restaurant, operated by the Haulfryn Group, which also has a number of holiday parks in North Wales, the West Country and other parts of the South East. None of the District's other holiday parks have leisure facilities.

- All of the holiday parks in Wealden operate on a seasonal basis between March and October.

[1] Holiday parks that comprise primarily static caravans and/or holiday homes, chalets and lodges for sale (on an outright or sometimes timeshare basis) or to rent.

7.1.2. Changes in Supply

- Martello Beach completed a small development of 12 luxury holiday homes for rent in 2008

- None of the other holiday parks in the District that we interviewed have expansion or development plans.

- Castle View Caravan Site at Pevensey Bay is currently in the process of applying for planning permission to convert to a static caravan site for 75 static units.

7.2. Current Performance and Markets

- Most of the holiday parks that we interviewed are currently operating at their licensed capacity for owned static caravans and holiday homes. Holiday parks usually have a small turnover of owners each year. They do not generally have difficulty in finding new owners to fill vacant units and plots. Some sites reported a slowdown in demand from prospective new owners in 2008 as a result of the Credit Crunch, which they expect to continue in 2009. Caravan sales have also reduced.

- Three sites reported demand from owners wanting to use their caravans/ holiday homes during the winter, particularly if they have purchased higher specification caravans/ holiday homes that are fully insulated and have heating.

7.3. Sector Development Potential

- Various research reports and articles[1] indicate that there has been substantial growth in the UK holiday parks market (in terms of both holiday home ownership and holiday rentals) in recent years and suggest good prospects for further growth moving forward. The sector has changed significantly over the last 10 years, with the emergence of a number of major holiday park operators that have acquired independent parks and invested heavily in them in terms of improving the quality of accommodation units, the development of central leisure, sports, entertainment and catering facilities, landscaping and improved environmental credentials. A growth in demand for short breaks, coupled with the improved quality of their offer and improved marketing, has enabled many parks to attract new markets outside the main season, including career couples and ABC1 families at weekends and emptynester/ retired couples and families with pre-school children during the week. This has enabled many parks to extend their season, with some operators now contemplating year-round operation.

- Most of the holiday parks that we spoke to in Wealden have no plans currently to upgrade or develop new facilities and amenities. This is not to say that they may not wish or need to do so in the future, under existing or new owners, particularly as market expectations in terms of the quality of accommodation units and requirements for on-site facilities increase.

- The majority of the District's holiday parks are currently trading at their licensed capacity for static caravans/ holiday homes and few have land available for expansion. They do not generally appear to be denying business for holiday home ownership, although are not actively seeking new business given that they are already at their maximum capacity. Some sites indicated that they have waiting lists of people wanting to come onto their site. Such demand has weakened in 2008 as a result of the Credit Crunch in some cases.

- Two existing holiday park operators in the District indicated that they would like to remain open throughout the winter.

[1] 'Holiday Centres, Leisure Intelligence', Mintel, October 2008; 'UK Holiday Parks – Fast Forward After A Setback', Insights, November 2003; 'Self-Catering Accommodation', VisitBritain, 2005

- The British Holiday Homes and Parks Association indicates a strong and growing market for holiday parks in the UK, both for home ownership in a park environment and for rental, and identified several examples of industry players actively in the market for new development and site acquisition. In many cases these developer-operators take over an existing caravan site or holiday park, and undertake extensive redevelopment work to create a high quality landscaped environment with luxury lodge accommodation. Our consultations with one of these multiple site operators - the Dreamlodge Group who have a site near Hastings – confirmed that they are looking for other development opportunities and would consider another site in this area should a suitable opportunity be available.

- These factors suggest that there could be market potential for:

    - The upgrading of existing holiday parks in Wealden in terms of:
        - High quality accommodation units;
        - Central leisure, sports, catering and entertainment facilities (on larger parks);
        - New amenities e.g. shower/toilet blocks, laundry facilities;
        - Improved access and facilities for disabled people;
        - Landscaping.
    - Year-round operation of existing holiday parks;
    - The expansion of existing holiday parks if they have land available (or are able to purchase new land);
    - The development of new holiday parks.

7.4. Planning Issues

7.4.1. Current Local Plan Policies

- Policies in the 1998 Adopted Local Plan 1998 will not permit the development of any new static sites for holiday purposes, based on advice from the former South East England Tourist Board that there was no market demand for new holiday parks in the Region. The main emphasis is on the improvement and upgrading of existing sites to cater for the more sophisticated demands of consumers and improve layout and landscaping aspects of the site. The same policy, TM5, does not permit the change of use of touring pitches to static pitches.

- In 2005, the text refers to a similar strategy to extend and improve existing sites rather than develop new, and for no new static sites. In addition there is a new policy - TM5 - preventing the change of use of static holiday caravans to residential mobile homes.

- Seasonal and occupancy conditions limit the periods that static caravan sites and holiday parks can open. There is no set period for opening – some sites may open for as little as 7 months, others for 10-11 months, but all are required to close for a certain period of time to prevent anyone living on the site permanently. The Environment Agency also restricts winter opening of coastal holiday parks that are at risk of flooding.

- The retention policy TM2 does not appear to cover static caravan sites and holiday parks.

7.4.2. National and Regional Guidance

- The Good Practice Guidance relating to holiday, touring caravan and chalet parks covers holiday chalets, caravan holiday homes, pitches for touring caravans, motor homes, camping and all types of self-catering accommodation. Some of the key points include:

    - The need for facilities should be carefully weighed against landscape protection.
    - Where possible visually intrusive sites and sites in flood risk areas should be re-located.
    - Planners should work with operators to improve the attractiveness of sites.
    - New sites are better located close to existing settlements and services.

    - Economic benefits as well as environmental impacts of developments should be considered.
    - Whilst occupancy conditions are a useful tool to prevent permanent occupation (more detailed guidance is provided on this), planners should be sympathetic to extended opening periods with trends towards year round activity.
    - Staff accommodation may be required on site, ideally using existing buildings/conversions, but accepting there may be a need for new residential development tied to the business.
    - More detailed guidance can be found in PPS7.

- Policy TSR5 of the South East Plan that covers accommodation has a specific point on holiday parks/unserviced accommodation, encouraging local authorities to facilitate their up-grading and enhancement, including extensions and to encourage the use of the accommodation year round for holiday purposes. The policy also recommends the identification of suitable sites for the relocation of holiday parks under threat from coastal erosion or flooding.

7.4.3. LDF Recommendations

a) The Development of Holiday Parks

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of holiday parks in the District (subject to all other material planning considerations) in terms of:

  - The expansion, development and upgrading of existing holiday parks;
  - The development of new holiday parks.

- In terms of policies regarding the development of existing holiday parks, these should include provision for the development of:

  - Shower and toilet blocks;
  - Laundry facilities;
  - Leisure, sports, catering and entertainment facilities;
  - Improved access and facilities for disabled people;
  - Improved landscaping.

- Positive consideration should also be given to permanent on-site accommodation for holiday park managers, particularly in the interests of security in the winter and to support year-round operation.

- Our research shows market potential for additional provision of holiday home accommodation in Wealden, for both ownership and rental. Existing holiday parks have limited land available for expansion and some coastal parks may be under threat of flooding and coastal erosion. There is a need therefore for the District Council to give positive consideration to the development of some new holiday parks in the District to meet the anticipated growth in demand and replace any coastal parks that may be forced to close.

- Holiday parks can be visually intrusive in the landscape. They may be an inappropriate form of accommodation to encourage in the High Weald and South Downs AONBs therefore, other than possibly in woodland settings.

- While occupancy conditions are needed to ensure that holiday homes are not used as permanent residential dwellings, such conditions should not preclude holiday parks that want to do so from remaining open in the winter. While many sites will only want to operate on a seasonal basis, there are operators in the District that see scope to attract business during the winter months. In such cases, occupancy conditions relating to the use of holiday homes purely for holiday use would be more helpful than conditions that limit the operating period for holiday parks. Such conditions will need to be robustly enforced where use of holiday homes as permanent residential accommodation is detected. Occupancy conditions that restrict winter opening of coastal holiday parks at risk of flooding may still be needed however, unless the Environment Agency can be persuaded to change its current policy.

b) The Retention of Holiday Parks

- Our research suggests that the District Council should maintain an explicit policy to resist the loss of holiday parks to other uses, particularly residential. Our research has identified a good market for holiday parks in the District and scope for existing parks to upgrade and further develop their facilities. We see no reason to allow the loss of existing holiday parks therefore.

8. GROUP AND YOUTH ACCOMMODATION

8.1. Current Supply

8.1.1. Current Supply of Group & Youth Accommodation in Wealden

- There are two YHA **youth hostels** in Wealden, at Alfriston and Blackboys. The Alfriston hostel has 68 beds and the Blackboys hostel has 30 beds. Both hostels are rated as 2 star and are open all year. The Alfriston hostel operates on a self-catering or catered basis, while the Blackboys hostel only provides self-catering accommodation. YHA also has a third hostel in East Sussex at Telscombe, near Newhaven, with 22 beds.

- Annan Court at Halland is a residential **retreat centre** for religious groups. It has 110 beds.

- Pilgrim Hall at Uckfield is a **residential Christian conference centre** that can accommodate up to 110 people and has a conference hall that can seat up to 130 people. It caters primarily for religious conferences during the week and church groups at weekends.

- The Bowles **outdoor activity centre** at Eridge offers a range of residential educational and corporate development courses. It has dormitory accommodation for 104 people and a separate lodge with 16 en-suite single and twin bedrooms. On site activities include rock climbing, abseiling, a dry ski slope. Ropes courses, and canoeing.

- Arena Pursuits is an outdoor pursuits company based at Bewl Water specialising in corporate entertainment and team-building courses. It has no accommodation itself, but works with local hotels and pub accommodation businesses if groups require overnight accommodation.

- We understand that there is a **bunkhouse barns** in the Seven Sisters area.

8.1.2. Planned Group and Youth Accommodation Development Projects

- The **YHA** is currently developing new hostels in Eastbourne, at the start of the South Downs Way, and Southease, near Lewes. The Eastbourne hostel (30 beds) is due to open in May 2009, while the Southease hostel (60 beds) is planned to open in Autumn 2009. The Southease hostel will form part of a larger outdoor activity centre development project. YHA has no plans currently for further hostels in East Sussex.

- The **PGL** activity holiday company is currently redeveloping the former Windmill Hill Place Tennis Centre near Herstmonceux into an activity centre. The site is undergoing a £4 m revamp and when complete will offer activity courses for school and youth groups, together with summer camps and family activity holidays during the summer. The centre will be capable of accommodating 450 guests and will include a sports hall, swimming pool, climbing towers and zip wires and a multi-sports area. Existing lakes will be used for canoeing and raft building. The centre is scheduled to open in May 2009.

8.2. Current Performance and Markets

- The **YHA hostels** in the District currently achieve annual average bed occupancies of 40-45%. This is typical of the performance of YHA hostels nationally. Occupancies have increased in recent years following the closure of the YHA hostels in Brighton and Hastings.

- Weekend demand is strong between April and October from individuals, families and groups, including family, friendship, religious, youth and rambling groups. These markets are also attracted midweek during the summer months and other school holiday periods. Overseas tourists are a significant market for the Alfriston hostel.

- The key midweek market for the District's hostels at other times of year is educational groups. Demand is particularly strong from school groups during the summer term, between May and early July. The Alfriston hostel is fully booked up to a year in advance with school groups for this period, coming to undertake river and coastal studies in the Cuckmere Valley and at Seven Sisters.

- The Blackboys hostel also attracts corporate groups during the week.

- Both hostels reported denying some weekend business during the summer, although not to a significant extent.

- The study has not included any research to assess the current performance and markets of the Christian conference and retreat centres in Wealden or the Bowles outdoor activity centre.

8.3. Sector Development Potential

8.3.1. Market Potential

a) Youth Hostels

- There are good prospects for future growth in the demand for hostel accommodation in the UK.

- There is likely to be continued and probably increased demand from educational and youth groups. YHA launched a new strategy in 2006 with the aim of reaching more young people, particularly disadvantaged young people; modernising its image, marketing and booking systems; and selling hostels that are not in key destinations in order to reinvest in upgrading its remaining network of hostels. YHA has subsequently successfully introduced its 'Learn 4 Real' educational visits programme and 'Do It 4 Real' summer camps.

- The continued growth in the UK leisure break market, increasing demand for activity holidays and breaks, and likely growth in overseas tourist visits to the UK whilst sterling is weak are likely to boost demand for hostel accommodation. Hostels may become more popular in the current economic climate given that they provide a low-cost accommodation option.

- These trends all suggest good prospects for continued and probably increased demand for hostel accommodation in Wealden. Having said this, the Wealden hostels may lose business, at least in the short term, to the new hostels opening in Eastbourne and Southease in 2009. These will provide higher quality accommodation than is available at the Alfriston and Southease hostels and represent a significant increase in the supply of hostel accommodation in the area.

b) Children's Activity Holiday Centres

- There could be market potential for the development of a children's activity holiday centre in Wealden. Such centres attract strong demand from school and youth groups. They can also attract demand for family activity holidays and breaks. Two of the leading UK activity holiday operators are already represented in East Sussex however: PGL opened a new centre at Windmill Hill in May 2009 and JCA has a tie up with the Pestalozzi International Village at Sedlescombe in Rother District.

c) Camping/ Bunkhouse Barns

- There could be market potential for the conversion of redundant agricultural buildings to camping/ bunkhouse barns in Wealden, particularly in locations that are popular for walking and other outdoor activities e.g. the South Downs, High Weald and Ashdown Forest. Such accommodation can be a popular choice for walking groups and youth activity groups. Camping/ bunkhouse barns do not generate much income however, and are difficult to support on a purely commercial basis.

- Our research found no clear evidence of market potential for such accommodation linked to the Cuckoo Trail. The trail does not appear to generate demand for overnight stays at present.

d) Outdoor Activity/ Education Centres

- There could be market potential for a further residential outdoor activity/ education centre in Wealden. The study has not involved any research to assess this potential however.

e) Residential Training/Conference/ Management Centres

- The study has not involved research to assess the market for residential training/ conference centres in the South East or discussions with conference centre operators to assess their interest in development opportunities in Wealden should they arise. However, from previous research we have undertaken for East Hampshire District we know that conference centre operators are interested in development opportunities in the South East Region. There could therefore be scope for the development of residential training/conference centres in Wealden if suitable properties become available for conversion and development for such a use.

8.3.2 Developer/ Operator Interest

- YHA has no plans currently for the development of further hostels in Wealden.

- As noted above, PGL will open a new residential activity centre at Windmill Hill in May 2009.

- Our research did not identify any proposals currently for the development of camping/ bunkhouse barns or residential training/conference centres.

8.4. Planning Issues

8.4.1. Current Local Plan Policies

- The 1998 Local Plan refers to bunkhouse and hostel accommodation under self-catering policies. It identifies the potential for the conversion of farm buildings to simple hostel and bunkhouse accommodation accessible from the South Downs Way (policy TM3). The 2005 Plan does not specifically refer to this form of accommodation.

8.4.2. National and Regional Guidance

- There are no specific policies relating to group and youth accommodation in the national guidance or South East Plan.

8.4.3. LDF Recommendations

- On the basis of our research we would recommend that Wealden District Council should establish planning policies that positively encourage the development of group and youth accommodation in the District (subject to all other material planning considerations) in term of:

    - The expansion and development of the existing youth hostels in the District;
    - New youth hostels;
    - Children's activity holiday centres;
    - Outdoor education centres;
    - Camping/ bunkhouse barns;
    - Residential training/conference centres.

- Our research suggests possible market potential for the development of such accommodation in the District. These forms of accommodation (other than residential training/conference centres) have strong appeal for those wishing to undertake outdoor activities, for which Wealden has a strong and developing product. The designation of the new South Downs National Park is likely to further raise the profile of this part of the District for outdoor activities. While some new supply will come on stream in 2009 in the District and surrounding parts of East Sussex, there could be further opportunities for such accommodation in the longer term, particularly as the District's activity tourism product develops.

9. CONCLUSIONS AND RECOMMENDATIONS

9.1. The Current Policy Framework

9.1.1. The Local Plan

- At an overall level, the policies in the Wealden Local Plan (1998) and Non Statutory Plan (2005) relating to tourism accommodation provide a predominantly negative and restrictive framework for future hotel and visitor accommodation development.

- Of key concern is that there appears to be little synergy between the tourism strategy for the District and planning policy for hotels and visitor accommodation and its application.

- Current policies were developed before the Tourism Good Practice Guidance was issued, so this is not reflected in either document, nor are the South East Plan tourism accommodation policies, which were adopted in 2004. The recommendations of the Wealden, Lewes and Tunbridge Wells Tourist Accommodation Retention Study (2004) are similarly not reflected in the current planning policies for the District.

- Whilst some additional policies were introduced in 2005 e.g. TM2 relating to the retention of serviced accommodation, the fact that the 2005 Plan is Non-Statutory means it carries less weight in an appeal situation, and hotels have been permitted change of use as a result.

- The spatial strategy in relation to hotel and visitor accommodation development – and particularly the development of new tourist accommodation (as opposed to conversions or re-positioning) – does not reflect market demand. It is paradoxical that the places of greatest appeal to visitors i.e. the AONBs are the places where new accommodation development is resisted, whereas hotels, for example, are directed to town centres, which have little appeal to tourists. As much of the visitor appeal of Wealden is its countryside, this does not follow national guidance, which advocates locating accommodation close to visitor draws.

- There is little provision for the development of any new accommodation – especially in the countryside - the emphasis is on conversion, upgrading and expansion.

- A concern to ensure tourist accommodation does not turn into permanent residential accommodation dominates the conditions attached to self-catering accommodation, touring caravan and camping site and holiday park occupancy and opening, and is restricting such accommodation businesses from extending the season and capturing winter let business, when there is evidence of market potential for it.

- Retention policies currently only apply to serviced accommodation, and are not supported by detailed guidance or an SPD, making their consistent and successful application difficult.

- The desire to develop the tourism and the hotel and visitor accommodation sector, and the recognition of the benefits this can bring, appear to carry little weight in planning decisions and seem to usually be overpowered by landscape conservation and other priorities.

- Our assessment of market demand and potential, together with operator consultation, indicate that these policies are holding the development of the sector back. There is good potential and clear destination benefits to be secured from further hotel and visitor accommodation development, provided this is delivered in a sustainable way. Moving forward, a more positive planning framework will be required for this potential to be realised.

9.1.2. Wealden Tourism Strategy

- The Wealden Tourism Strategy[1] sets out the following vision for tourism in Wealden:

  Wealden as a must-visit destination that offers distinctive, high quality, well-managed visitor experiences, delivered by a professional, profitable and responsible tourism industry that makes a major contribution to the vitality of the District and the quality of life of its people.

- The strategic objectives for tourism in the District are identified as follows:

  - To maximise the contribution that tourism can make to improving the quality of life for local people, particularly in terms of improving village and town vitality through helping to maintain and enhance local services and amenities.
  - To fully capitalise on the economic benefits that tourism can bring to the District, particularly in terms of rural and farm diversification.
  - To ensure effective management of visitors and responsible visitor behaviour (particularly in the East Sussex Downs and at Pooh Bridge and Hartfield) in order to avoid any adverse impact from tourism on the environment and local communities.
  - To improve the quality of all aspects of the District's tourism product.
  - To achieve a greater geographic and seasonal spread of visitor demand in order to boost off-peak business and help relieve pressure on heavily visited parts of the District and peak visiting times.
  - To reduce visitor car miles and encourage non-car based visits and visitor activity.
  - To ensure profitable, well managed and responsible tourism businesses.
  - To make the best use of available public sector resources and funding for tourism in Wealden.
  - To champion local distinctiveness, produce and traditions in the development of tourism in the District.

[1] 'All Together Better' – A Tourism Strategy and Action Plan for Wealden 2004-2009

- Key tourism market opportunities identified in the Tourism Strategy are as follows:

    - Potential growth in leisure break demand from London and the South East, including off-peak business;
    - The development of activity breaks, especially for walking, but also possibly for horse-riding, cycling and other outdoor activities.

- The Tourism Strategy identifies the following accommodation development opportunities and priorities in the District (although these were not based on the depth of research that has been undertaken for the Hotel & Visitor Accommodation Futures Study):

    - Opportunities for the development of further B&Bs and self-catering accommodation;
    - Potential for more farmhouse B&Bs and self-catering barn conversions on farms;
    - Scope for good quality pub accommodation;
    - A need for more low-priced B&B accommodation;
    - Potential for a youth hostel in Ashdown Forest or Wadhurst;
    - Ongoing investment in the District's hotels;
    - A need to halt the loss of hotel accommodation to residential redevelopment;
    - Ongoing redevelopment and improvement of the District's caravan and camping sites;
    - Possible development of further small scale touring caravan and camping sites;
    - A need to encourage all accommodation establishments to participate in the National Accessible Scheme.

- The Tourism Strategy is to be reviewed and updated in 2009. The findings of the Hotel & Visitor Accommodation Futures Study will be taken on board in this review.

9.1.3. The Emerging LDF

- As part of the LDF Wealden District Council is developing its Core Strategy and is currently consulting on its Spatial Development Options.

- The purpose of the Spatial Development Options Consultation document is to set out a number of broad approaches to accommodate housing and employment within the District.

- Tourism is mentioned as part of Wealden's spatial vision, however, the District Council is not at a sufficiently advanced stage in its LDF process to introduce tourism and visitor accommodation specific policies at this stage.

- Within Wealden's Spatial Development Options Consultation document vision element three - Increasing economic momentum states:

  "Tourism will be a more important source of local income generation, and Wealden will support a better quality, year-round visitor economy.

- As Wealden is at an early stage in its LDF production there are currently no tourism-related SPDs proposed.

- Hotel Solutions believes that policies on hotel and visitor accommodation need to be integrated into the Wealden LDF. This would be in line with the national Good Practice Guide.

9.2. Identified Accommodation Development Potential

- The Wealden Hotel & Visitor Accommodation Futures Study identifies market potential for the following accommodation developments in the District (subject to all other material planning considerations):

Hotels

- New country house hotels
- New spa hotels;
- New golf resorts;
- The development of hotel accommodation linked to wedding and conference venues, including visitor attractions that cater for these markets;
- The upgrading, expansion and development of existing hotels in terms of additional bedrooms and leisure, spa, conference and banqueting facilities;
- New budget hotels along the A22 and A27

Pub Accommodation

- The upgrading and/or expansion of existing pub accommodation operations:
- The development of new pub accommodation operations through the development of guest bedrooms within and/or adjacent to pubs.

Guesthouses and B&Bs

- The upgrading and/or expansion of existing guesthouses and B&Bs;
- The establishment and development of new guesthouses and B&Bs.

Self-Catering Accommodation

- The conversion of barns and other redundant agricultural buildings to self-catering accommodation, in terms of both individual units and holiday cottage complexes;
- The development of purpose-built holiday lodges, chalets and log cabins, again both as individual units and in small complexes (subject to meeting environmental impact considerations);
- The expansion and development of existing holiday cottage complexes in terms of the development of additional units and central leisure facilities and other amenities.
- The development of lodges and holiday cottages linked to outdoor activities such as golf, fishing and horse-riding.

Touring Caravan and Camping Sites

- The expansion, development and upgrading of existing touring caravan and camping sites;
- The use of touring pitches for seasonal tourers;
- The development of new touring caravan and camping sites;
- The development of new luxury camping accommodation products, such as camping pods, yurts and tipis.

Holiday Parks

- The expansion, development and upgrading of existing holiday parks;
- The development of new holiday parks.

Group and Youth Accommodation

- The expansion and development of the existing youth hostels in the District;
- New youth hostels;
- Children's activity holiday centres;
- Residential outdoor education centres;
- Camping/ bunkhouse barns;
- Residential training/conference/ management centres.

- The Hotel & Visitor Accommodation Futures Study provides evidence of strong demand for all forms of visitor accommodation in Wealden at weekends throughout the year and during the summer months and other school holiday periods, and shortages of all types of accommodation at these times. There is also good potential for further growth in demand for hotel and visitor accommodation in the District from the leisure break, activity tourism, overseas tourist and weddings markets and potential for accommodation businesses to extend their operating season and attract year-round trade. While the primarily leisure-driven nature of hotel and visitor accommodation demand in Wealden may limit the occupancy levels that can be achieved in the District, there is evidence that good quality hotel and accommodation offers can achieve high prices in the District, and good levels of profit and return on investment therefore. If tourism is to develop further in Wealden there is a need to encourage the development of further good quality visitor accommodation; support existing accommodation businesses in improving their product and extending their season; and retain existing accommodation establishments (unless they are incapable of being upgraded or attracting new owners).

- In locational terms, the study suggests market potential for the development of all forms of visitor accommodation in all parts of the District, with the exception of hotel development in the town centres, for which there is limited market potential and no obvious sites available. The development of large holiday parks may however be inappropriate in the High Weald and South Downs AONBs, other than possibly in woodland settings.

- Many of the forms of visitor accommodation that the study has identified market potential for can be accommodated in more sensitive landscapes, particularly where they involve the re-use of existing buildings or where they are small-scale in nature.

- Many of the forms of visitor accommodation that the study has identified market potential for can provide opportunities for farm diversification and for boosting farm incomes.

- There is market potential and need to improve accommodation provision (of all types) for disabled people.

9.3. Future Policy Direction – General Principles

a) Planning for Growth

'The sector is set for growth for various environmental, social and economic reasons. This needs to be recognised by public authorities and reflected through planning policy'. (Wealden accommodation operator).

- This should be the starting point for the District Council; it needs to recognise that tourism is growing and to plan for the hotel and visitor accommodation development potential identified in the Hotel & Visitor Accommodation Futures Study through the update of the Wealden Tourism Strategy, which will inform the LDF process.

b) Integrating Tourism and Planning Policy

- This requires establishing a vision for tourism and integrating it with all aspects of Wealden's wider strategies and plans, as set out in the South East Plan:

  'At the local level it is important to establish a comprehensive, long-term vision for the role of tourism and related activities within a locality. The vision needs to be sufficiently explicit and embedded in the community strategy, the local cultural (or tourism) strategy and the Local Development Framework in order to shape investment and decisions'.

  Section 14.5 - Tourism and Related Sports and Recreation (The South East Pkan 2009)

- This will ensure that planning policies are in synergy with tourism policies and that decisions on planning applications are consistent and support and deliver the bigger destination vision and the role tourism is to play in this. The Tourism Strategy is due for up-dating and this presents an ideal opportunity for tourism development needs to be articulated and planning policy development to take these on board.

c) Recognising the Benefits of Tourism

- The tourism sector requires a higher political profile in Wealden and critical to this is acknowledging the economic as well as social and environmental benefits that tourism can bring, especially to rural areas, helping to underpin local services, pubs and agricultural enterprises and retain character buildings. This picks up on the rural tourism policies (TSR2) set out in the Regional Spatial Strategy.

  'Opportunities to promote tourism and recreation-based rural diversification should be encouraged especially where they can provide jobs and are of a scale and type appropriate to their location. Local planning authorities in formulating planning policies and taking decisions will support proposals that develop tourism opportunities associated with all types of rural development initiatives'.

- The supporting text acknowledges the potentially significant environmental impacts associated with tourism development, but suggests this can be controlled by including specific criteria in Development Plan Documents against which to consider applications.

d) Starting from a Positive Place

- Whilst we are by no means advocating opening the floodgates to widespread or indiscriminate hotel and visitor accommodation development, we do believe that a more permissive policy approach that allows accommodation development subject to meeting certain criteria (relating to access, scale, design and other potential impacts), would provide a more positive and nurturing framework for the development of the sector.

e) Reflecting Good Practice and Strategic Guidance.

- The Good Practice Guide and policies adopted in the South East Plan provide a clear steer for local authorities on the development of tourist accommodation policies. TSE's guidance on planning for hotel and pub accommodation development and hotel retention policies and research on the development potential of the self-catering sector provide further guidance to local authorities. Wealden District Council should thus take full account of this guidance in moving forward with the development of its policies for hotel and visitor accommodation development.

9.3. Future Policy Direction - Specific Issues to Address

a) A Locational Strategy that Meets Market Demand

- Our research has identified potential for the development of hotel and visitor accommodation development of all types in all parts of Wealden, including the High Weald and South Downs AONBs and Ashdown Forest. Current policies restrict development in these parts of the District however. These areas of special landscape quality are clearly a key draw for visitors to Wealden and where they ideally want to stay. While safeguarding the landscape in these locations is clearly of paramount importance, we would suggest that opportunities for hotel and visitor accommodation development that can be satisfactorily accommodated in these areas without detriment to the environment should be more positively considered in the future in the interests of sustainable tourism, supporting farming diversification and making use of existing buildings.

b) Planning Conditions that Reflect Modern Patterns of Holiday Taking

- Holiday taking patterns have changed, resulting in extended season and often year round demand for tourist accommodation.

- Concerns about holiday homes and caravans becoming permanently occupied have resulted in the application of conditions either limiting occupation by any one occupant to 28 days, or limiting the months that a unit or site can open. However, this is resulting in operators being unable to extend their season and take bookings during periods that they know there is demand for e.g. Christmas and New Year, or in the case of holiday cottages being unable to take longer-term winter lets for example from relocations/people moving house. Touring sites are also prevented from taking seasonal tourers under current pitch occupancy restrictions.

- National guidance encourages planning authorities to give sympathetic consideration to opportunities to extend opening periods of unserviced accommodation (where there is demand) using conditions to ensure holiday use. Many of the conditions currently applied by Wealden are historic and don't reflect these current market conditions. Concerns about permanent occupation can be dealt with using other tools: holiday home parks for example obtain proof of a permanent residence elsewhere through production of a Council tax bill, and contracts between holiday home owner and site operator specify that the unit cannot be permanently occupied; a register of users of holiday cottages is also commonly used to ensure they are not permanently occupied.

- More flexibility in this respect would permit additional markets to be attracted and allow the tourist season to be extended and year-round business to be developed. The spread of demand across the year also improves use and is good for businesses, helping to reduce seasonal employment and generate additional spending to local communities. Seasonal operating conditions may still be needed for coastal holiday parks and touring caravan and camping sites at risk of flooding, unless the Environment Agency can be persuaded to change its current policy stance.

c) Tightening and Extending Retention Policy

- The retention policy as it stands lacks teeth and has proved difficult to enforce, added to which it currently only covers the retention of serviced accommodation.

- Self-catering accommodation is also seen as being under threat from the pressure of permanent residential use and there are shortages of touring caravan and camping holiday park accommodation at peak times and few, if any locations in which to replace sites if they are lost. The retention policy thus needs to be extended to include these forms of accommodation. There is no need however for the retention policy to be applied to small guesthouses and B&Bs: doing so could stifle the development of the sector if operators are discouraged from entering the sector for fear that they will not be allowed to revert to residential use once they wish to retire, move away or cease trading.

- Future tourist accommodation retention policy needs to follow the principles set down in Tourism South East's guidance 'Here to Stay' (summarised at Appendix 11) and make use of the 'toolkit', which sets out a procedure to follow and identifies evidence to be produced in assessing change of use applications. These criteria and information requirements will need to be set down in writing, and the Council will need access to independent information and advice to support these assessments. This is a very specialist area currently being dealt with by a generalist development control team who can not be expected to have this expertise. This level of detail would best be delivered through the preparation of an SPD, and Development Control Officers felt this would help them greatly in this area of their work. This approach will bring transparency to the process and ensure consistency in the application of these policies.

d) Providing for New Accommodation in the Countryside

- New accommodation is currently directed to towns and villages, with policies relating to development in the countryside focusing on the conversion of existing buildings. However, this policy is too restrictive and does not fully reflect market opportunities or the commercial realities of visitor accommodation development and operation. We would suggests therefore that there needs to be greater flexibility (subject to the usual caveats in terms of scale and impact) to also allow some new accommodation development in the countryside, such as new-build extensions to existing properties; standalone new-build accommodation units such as log cabins and lodges and purpose-built holiday cottages; and purpose-built shower/ toilet blocks and leisure facilities on touring caravan and camping sites and holiday parks.

e) Accommodating Emerging Visitor Accommodation Offers

- New tourist accommodation products are emerging, and the innovative or sometimes hybrid nature of these offers can make it difficult for them to fit into standard planning/use class boxes. Yurts and camping pods are two good recent examples, crossing permanent/semi-permanent boundaries. In such cases there may be no planning case law, for example the first camping 'pods' in the Lake District were dealt with under the Council's static caravan policy, where the presumption was against new development, but in fact they made a departure from policy based on justifiable reasons. This is an excellent example of how to make things happen through a more flexible approach to policy implementation.

- In addition, the standard of some traditionally poor quality offers is improving as they re-position themselves in the market. Holiday parks are a good example of this; static caravans generally have a very negative image in terms of perceptions of their visual impact and the enforcement difficulties associated with preventing their permanent occupation. However companies like Dreamlodge are developing a whole new breed of holiday home parks that are very upmarket, superbly landscaped, well-managed and offering very high quality aesthetically pleasing units. They may develop new parks if planning will allow, or purchase existing sites to redevelop.

  Perceptions of these offers needs to change in line with product development trends, and policies relating to them adjusted accordingly to give flexibility where there is potential.

f) Planning for Staff Accommodation Needs

- Staff accommodation is needed in association with both serviced and unserviced tourist accommodation offers due to a lack of affordable housing and issues to do with managing accommodation and security especially in rural areas. This is recognised and included in South East Plan policy TR5.

- Currently, countryside policies allow for new permanent dwellings for those employed in agriculture or forestry or exceptionally another enterprise where a countryside location is necessary (DC2) where a functional need is demonstrated and subject to meeting other criteria regarding scale, integration and financial viability of the business. However, there are concerns about this being used as a back door to new residential development in the countryside, and operators have reported applications for wardens accommodation on caravan sites for example being refused or discouraged. Future policies need to recognise this requirement and be sympathetic to such developments.

9.4. Other Requirements for Local Authority Intervention and Support

- Aside from having a positive planning policy framework for hotel and visitor accommodation development there are other roles that Wealden District Council and its partners can play to more proactively support the development of the District's hotel and visitor accommodation sector.

a) Destination Marketing

- Many of the hotel and accommodation providers that we spoke to in the District identified a need for improved and increased destination marketing for Wealden, to raise awareness of the District in the domestic leisure break and overseas tourist markets. This can most effectively be achieved through continued participation in the Enjoy Sussex campaign.

b) Business Support for Accommodation Businesses

- Small hotels and visitor accommodation establishments are frequently purchased or established by people that are new to the sector and who have little or no previous experience of running accommodation businesses. It would be helpful therefore for the public sector partners to provide and promote some form of business support package to assist new entrants in establishing and developing rural accommodation in their area. Such a package could include:

    - Information packs providing all of the information that new entrants will need when setting up and running a rural accommodation business;
    - Training seminars and workshops;
    - Grant aid or some other form of financial assistance.

- Grant aid will almost certainly be needed to support the development of camping barns, should such accommodation be seen as a priority. Camping barns are not usually commercially viable without some form of public sector financial support.

- Tourism South East provides a range of business advice publications and runs various training courses and projects that could be proactively promoted to accommodation providers in Wealden.

c) Proactive Promotion of Accommodation Development Opportunities

- There would be merit in Wealden District Council undertaking work to proactively promote the accommodation development opportunities identified in the Hotel & Visitor Accommodation Futures Study in terms of:

    - A local PR campaign:
    - Alerting business support agencies to the opportunities;
    - Mailshots to pubs, farmers, wedding and conference venues and golf courses;
    - Accommodation development workshops;

- There is no need for a proactive hotel investment marketing campaign for the District: hotel development opportunities are more likely to be opportunistic if suitable properties become available for conversion or sites become available on the A22 or A27. It can be left to property agents to market such properties and sites. There would however be merit in including information about Wealden on TSE's regional hotel investment website to highlight the sort of hotel development opportunities that there could be in the District.

d) Developing the Tourism Product of the District

- The further development of the District's tourism product should provide an additional boost to the demand for hotel and visitor accommodation in the District by providing new reasons to visit and return. Key priorities and opportunities identified in the Wealden Tourism Strategy that could boost accommodation demand include:

    - The development of visitor attractions e.g.:
        - The Farley's Yard Project;
        - The redevelopment of the Ashdown Forest Visitor Centre.
    - The development of the activity tourism product in terms of:
        - The development of clusters of walks around villages and towns – that can be promoted for centre-based walking breaks;
        - The development of the Cuckoo Trail circular rides as a centre-based cycle break product;
        - The establishment of a Sussex Country bridleway as a horse riding break product
    - Events development.

- The development of activity tourism in Wealden is likely to create new demand for visitor accommodation in the rural parts of the District, particularly in terms of touring caravan sites, camping pitches and sites, camping pods, camping barns and hostel accommodation. In turn, the development of such accommodation will also be needed to support the development of activity tourism.

- The development of walking is likely to generate the greatest demand for rural accommodation. In developing the District's walking product, the District Council and its partners need to recognise that accommodation businesses are generally looking for more than one-night stays. This suggests that a strategy that seeks to develop clusters of circular walks around accommodation bases, possibly as promoted centres for walking breaks, would be more in line with the requirements of accommodation operators, rather than the development of further linear and long distance walking trails.

- Accommodation providers will also need to be encouraged to provide appropriate facilities for guests coming to walk, cycle or take part in other outdoor activities. This would include drying rooms and washing facilities. Relevant accommodation businesses should be encouraged to take part in the VisitBritain Walkers & Cyclists Welcome Scheme.

e) Monitoring Accommodation Development and Performance

- The Hotel & Visitor Accommodation Futures Study provides a snapshot of the Wealden accommodation sector at one point in time. Moving forward it will be important for the District Council to continue to monitor how the sector is developing and performing to establish ongoing priorities for the further development and retention of hotels and visitor accommodation businesses in the District. This will require ongoing updating of the District Council's database of hotels and visitor accommodation establishments and ongoing monitoring of planning applications for hotel and visitor accommodation projects. The District Council may also need to monitor the brochures and websites of holiday cottage letting agencies to identify changes in the District's self-catering supply. The Hotel & Visitor Accommodation Futures Study provides lists of the hotel and visitor accommodation establishments that we identified through our research and checking of WDC and TSE accommodation stock records. These can be used to update the District Council's database.

- In terms of monitoring hotel and accommodation performance, the District Council's Tourism Business Survey should help to do this on an ongoing basis. The survey questionnaire could be further developed to monitor denied business, future development intentions and planning issues. There may also be merit in periodically undertaking a more in depth study of certain types of accommodation, e.g. hotels and holiday parks, particularly as new supply comes on stream.

9.5. Moving Forward – Next Steps

- In moving forward the following actions will be needed to disseminate and act on the study findings in order to capitalise on the opportunities identified:

a) Using the Study to Inform the Local Development Framework

- The District Council's primary objective in commissioning the Hotel & Visitor Accommodation Futures Study was to inform the development of LDF policies for hotel and visitor accommodation development and retention. The study findings should thus be used to ensure that relevant LDF documents make adequate provision to support and encourage the development of the types of hotel and visitor accommodation for which market potential has been identified (subject to meeting other planning requirements) and to retain existing good quality accommodation businesses. This should start with making an input to the next Core Strategy consultation document. Consideration should also be given to the preparation at least of an SPD covering accommodation retention.

b) Achieving a More Consistent and Positive Approach in the Interim

- It is likely to be some time until the policies of the Local Development Framework are firmly in place. In the meantime, it will be important to ensure close working between the District Council's Tourism/Economic Development, Leisure, Community and Planning/ Development Control teams in determining planning applications for visitor accommodation development. This should ensure a joined up and consistent approach that reflects tourism as well as planning priorities, and is an opportunity to begin steering hotel and visitor accommodation development schemes more positively in line with the potential identified in the Hotel & Visitor Accommodation Futures Study, assuming that this is the direction that the District Council will wish to move towards in the LDF.

- Similarly, Development Control Officers need to take the findings of this study on board as far as they are able to within the current policy framework and with regard to retention, to consider any means to tighten up retention policies and procedures prior to a stronger policy being in place.

- A workshop/presentation of the study findings to a cross departmental team that includes Tourism, Economic Development, Leisure, Culture and Community, Planning Policy and Development Control teams – and any others it is considered will need to take action as a result of the study findings – would help to disseminate the findings and begin the process of change that can feed into the various work programmes each has responsibility for.

c) Acting on the Study Recommendations for Proactive Support

- The Tourism/ Economic Development Team will need to decide whether and how best to act on the study's recommendations regarding proactively supporting the development of the District's hotel and visitor accommodation sector in terms of:

    - Increasing and improving the marketing of Wealden as a visitor destination;
    - Business support measures for new accommodation businesses;
    - Proactive promotion of the visitor accommodation development opportunities identified in the Hotel & Visitor accommodation Futures study;
    - Developing the tourism product of the District;
    - Ongoing monitoring of hotel and visitor accommodation development and performance.

- Moving forward on these issues will need to be further considered as part of the District Council's planned review and update of the Wealden Tourism Strategy and Action Plan.

d) Releasing the Study Findings into the Public Domain/ Wider Dissemination of the Study Findings

- A key consideration in moving forward will be to decide whether and how best to release the study findings into the public domain. At this stage the report is issued as a confidential consultancy report to the District Council. If it is to be used as part of the evidence base for the Local Development Framework it will become a publicly available document under the Freedom of Information Act. There are many positive messages in the report and many positive reasons for making the study findings more widely available to existing accommodation providers in the District and people that might be interested in developing or supporting the development of new accommodation businesses in Wealden. The District Council will need to decide whether to release the report in its entirety, or edited versions of it, possibly in the form of accommodation development fact sheets (Hotel Solutions is already contracted to produce hotel investment fact sheet material for Wealden to be uploaded onto TSE's regional hotel investment website). The District Council will also need to decide whether there are aspects of the report that it may be more prudent to keep confidential.

APPENDICES

APPENDIX 1

WEALDEN HOTELS & ACCOMMODATION BUSINESSES INTERVIEWED

Hotel/ Accommodation Establishment	Location
Hotels	
East Sussex National Golf Resort	Uckfield
Horsted Place	Uckfield
Buxted Park Hotel	Buxted
Dale Hill Hotel & Golf Club	Ticehurst
The Star	Alfriston
Deans Place Hotel	Alfriston
Roebuck Hotel	Wych Cross
Premier Inn Eastbourne North	Polegate
Birling Gap Hotel	Birling Gap
Crossways Hotel	Wilmington
Chalk Farm	Willingdon
Stone House	Rushlake Green
Pub Accommodation	
Griffin Inn	Fletching
Chequers Inn	Maresfield
The Horseshoe Inn	Herstmonceux
Plough & Horses	Crowborough
Corn Exchange	Hailsham
Chequers Inn Hotel	Forest Row
The Brambletye	Forest Row
Bay Hotel	Pevensey Bay
Horam Inn	Horam
George Inn	Alfriston
Guesthouses/ B&Bs	
Bolebroke Castle/ Watermill	Hartfield
Longleys Farm Cottage	Hailsham
Spring Cottage	Wadhurst
The Orchard B&B	High Hurstwood
Old Mill Farm	High Hurstwood
New Glenmore	Furners Green
Netherwood Lodge	Muddles Green
South Paddock	Maresfield Park
Holly House	Chelwood Gate
Yew House	Crowborough
Braemore	Crowborough
The Coach House	Uckfield
Iwood	Heathfield
Riverdale House	Alfriston
Wingrove House	Alfriston
The Beach House	Pevensey Bay

Self-Catering Properties	
Danny Cottage	Alfriston
Beachy Head Cottages	East Dean
Polhills	Arlington
Great Streele Farm Cottage	Framfield
Mallingdown Oast	Piltdown
Pekes	Golden Cross
The Coach House	Rushlake Green
Streele Farm	Rotherfield
The Stables, Home Farm	Heron's Ghyll
The Games Barn, Cranesden Farm	Mayfield
The Stable	Hailsham
Little Marshfoot	Hailsham
Bardown Farm	Stonegate
Coopers Farm Cottage	Stonegate
Whitehouse Farm Cottages	Nutley
3 Shrublands	Crowborough
Silverbeach	Pevensey Bay
Self-Catering Letting Agencies	
Holiday Cottage Group	
Hoseasons	
Touring Caravan and Camping Sites	
Cedar Gables	Wadhurst
Horam Manor Touring Park	Horam
Honey's Green Farm Caravan Park	Halland
Heaven Farm	Furners Green
Renhurst Farm	Mark Cross
St Ives Farm	Hartfield
Peel House Farm Caravan Park	Polegate
Fairfields Farm Caravan and Camping Park	Westham
Holiday Parks	
Grey Tower Caravan Park	Pevensey
Martello Beach	Pevensey Bay
Normans Bay Caravan Park	Normans Bay
Glyndley Manor Cottages	Stone Cross
Orchard View Park	Herstmonceux
Greenviews Caravan Park	Heathfield

APPENDIX 2

WEALDEN - HOTELS – JANUARY 2009

Hotel	Standard[1]	No. Rooms
Ashdown Forest[2]		
Ashdown Park Hotel & Country Club, Wych Cross	4 star (Red) Country House	108
The Roebuck Hotel, Wych Cross	2 star	30
High Weald		
Stone House, Rushlake Green	Luxury Country House[3]	7
Low Weald		
Uckfield Area		
East Sussex National Golf Resort & Spa	Luxury Golf Resort[3]	104
Buxted Park	4 star Country House	44
Horsted Place	3 star (Red) Country House	20
Halland Forge Hotel	2 star	20
Hailsham Area		
Boship Farm	3 star	47
Travelodge Hellingly	Budget	52
The Old Forge Hotel, Magham Down	n/a	8
Polegate Area		
Premier Inn Eastbourne North (Polegate)	Budget	40
South Downs		
Deans Place, Alfriston	3 star	36
Star Inn, Alfriston	3 star	37
Birling Gap Hotel	2 star GA[4]	9
Crossways	4 star RWR[5]	7
Chalk Farm Hotel, Willingdon	n/a	8
Pevensey Bay		
Priory Court, Pevensey	n/a	10

Notes:

1. As rated by the AA or VisitBritian
2. Including Crowborough
3. Not inspected by the AA or VisitBritain
4. Guest Accommodation
5. Restaurant with Rooms

APPENDIX 3

WEALDEN – PUB ACCOMMODATION – JANUARY 2009

Hotel	Standard	No. Rooms
Ashdown Forest/ Crowborough		
The Brambletye, Forest Row	3 star Inn	21
Chequers Inn, Forest Row	n/a	26
Anchor Inn, Hartfield	n/a	2
Plough & Horses, Crowborough	n/a	15
High Weald		
Best Beech Inn, Wadhurst	4 star GA[1]	6
The Greyhound, Wadhurst	n/a	5
The Cherry Tree Inn	n/a	3
The Bull Inn, Three Leg Cross	n/a	4
Middle House Hotel, Mayfield	n/a	5
The King's Arms, Rotherfield	n/a	2
Low Weald		
Griffin Inn, Fletching	4 star Inn	13
Corn Exchange, Hailsham	3 star inn	6
Chequers Inn, Maresfield	n/a	16
The Piltdown Man, Isfield	n/a	3
Buxted Inn, Buxted	n/a	2
Black Lion Inn, Halland	n/a	7
Horam Inn, Horam	n/a	6
Horseshoe Inn, Herstmonceux	n/a	20
Roebuck Inn, Laughton	n/a	5
The George	n/a	3
South Downs		
George Inn, Alfriston	n/a	6
The Giant's Rest, Wilmington	n/a	2
Pevensey Bay		
Bay Hotel, Pevensey Bay	3 star GA[1]	11

Notes:
1. Guest Accommodation

APPENDIX 4

WEALDEN – GUESTHOUSES/ B&Bs – JANUARY 2009

Establishment	Standard	No. Rooms
Ashdown Forest/ Crowborough		
Ashdown Forest		
Duddeswell Manor	4 star *	1
Holly House, Chelwood Gate	4 star	5
West Meadows B&B, Nutley	4 star	3
Dorset House	3 star	2
Gospel Oak, Coleman's Hatch	3 star	2
Laurel Cottage B&B	3 star	2
Bolebrooke Castle & Watermill, Hartfield	n/a	9
The Grange, Hartfield	n/a	1
June Cottage, Forest Row	n/a	1
Crowborough		
Braemore	4 star	2
Yew House B&B	4 star	6
Bathurst	4 star	1
Arthur Family B&B	n/a	2
Copper Beech B&B	n/a	2
Green Cottage	n/a	3
Hill Cottage	n/a	3
Hope Court	n/a	2
Littlewood House	n/a	3
The Parsonage	n/a	2
High Weald		
High Brow, Cross in Hand, Heathfield	4 star	2
Holly Grove, Heathfield	4 star	2
Little Tidebrook Farm, Tidebrook, Wadhurst	4 star *	2
Woodbine Farm, Cross in Hand, Heathfield	4 star	2
The Cottage, Rushlake Green	4 star	2
High Brow, Cross in Hand	4 star	3
Iwood , Heathfield	4 star	6
Rose Cottage, Mark Cross	4 star	3
Church House B&B, Wadhurst	Awaiting	2
Bryants House, Ticehurst	n/a	3
April Cottage Guesthouse, Mayfield	n/a	3
Houndsell Cottage, Mark Cross	n/a	3
Spring Cottage, Best Beech Hill, Wadhurst	n/a	2

Notes:

* B&B for Horses (B&B accommodation with stabling and grazing for horses)

Establishment	Standard	No. Rooms
Low Weald		
Uckfield Area		
Tamberry Hall, Halland	5 star	3
Beechwood B&B, Halland	5 star	4
South Paddock, Maresfield Park, Uckfield	5 star	2
Beggar's Barn, Framfield, Uckfield	4 star *	3
New Glenmore, Furners Green, Uckfield	4 star	3
Old Mill Farm, High Hurstwood, Uckfield	4 star	3
Ranger's Cottage, Blackboys	4 star	2
The Orchard B&B, High Hurstwood, Uckfield	4 star	2
Chillies Granary, High Hurstwood	4 star	3
Marsden Mount, Maresfield	4 star	3
The Coach House, Uckfield	n/a	3
Shortgate Manor Farm, Halland	n/a	3
Hailsham Area		
Old Whyly, East Hoathly	5 star	3
Wartling Place, Wartling	5 star	3
Hall Court Farm, Ripe	5 star	3
Hailsham Grange, Hailsham	4 star	4
Sandhurst, Herstmonceux	4 star	4
Windesworth, Carters Corner, Hailsham	4 star	2
Holmbush House, Hellingly	4 star	3
Netherwood Lodge, Muddles Green	4 star	2
The Faulkners, Isfield	4 star	3
The Stud Farm, Bodle Street Green	3 star	2
Longleys Farm Cottage , Hailsham	3 star	3
Batchelors, Cowbeech	n/a	3
Church Farm Cottage	n/a	1
Conquerors, Herstmonceux	n/a	3
Hale Farm House, Chiddingly	n/a	3
Stoneacre Lodge, Herstmonceux	n/a	1
Oak Mead Nursery, Horam	n/a	3
The Old Farmhouse, Isfield	n/a	2
Waldernheath Country House, nr Hailsham	n/a *	3
South Downs		
Alfriston		
Wingrove House	5 star	5
Riverdale House	4 star	4
Rose Cottage	4 star	2
Chestnuts	n/a	3
Dacres	n/a	2
South Downs		
Dawes House, Berwick	n/a	2
Ash Farm, Filching	n/a	3
The Paddocks Stables, Jevington	n/a *	1
Bo-peep Farmhouse, Alciston	n/a	3
Lower Claverham Farm, Berwick	n/a	2
Pevensey Bay		
Providence Cottage, Pevensey	n/a	1
Napier Guest House	n/a	3
The Beach House	n/a	1

APPENDIX 5

WEALDEN GUESTHOUSE AND B&B PERFORMANCE

1. Introduction

- Telephone interviews were conducted with a total of 16 B&B and guesthouse operators in Wealden district. Establishments participating are highlighted at the end of this summary report. In addition, the findings from Wealden Tourism Survey 2008 for B&Bs and guesthouses have also been taken into consideration as part of this overview report.

2. Reasons for Entering the B&B and Guesthouse Sector

- B&B and guesthouse proprietors in Wealden tend to enter the sector for a number of reasons including for lifestyle reasons (e.g. children have left the family home), to maximise the use and financial return from a large house, as a secondary income/to help fund their retirement, and purely as a business venture.

- As some B&Bs and guesthouses in the district operate on a casual basis only, not all establishments make themselves available for bookings on a year round basis.

3. Occupancy Levels & Trends

- Average annual occupancy levels vary significantly for B&Bs and guesthouses in Wealden, ranging from 12% to 85%, although are most typically around 50-60%.

- Occupancy levels vary considerably between the low and peak season.

- Occupancies have generally increased in 2007 and 2008 compared with previous years, although some B&B and guesthouse operators reported that occupancy levels have remained static or in some cases has declined.

- Where there has been a drop off in business, this relates to a decline in the family leisure market, the overseas tourist market or the contractor market.

4. Weekend Demand

4.1. Strength of Demand

- B&Bs and guesthouses in Wealden report that business at weekends is strong particularly when compared with weekday business. Although this is most marked during the peak summer months, weekend occupancies can still be high during the shoulder months (April/May and September/October).

4.2. Reasons for People Staying at Weekends

- Weekend visitors to Wealden district come for a variety of reasons including attendance at weddings, visiting friends and relatives, weekend breaks from London and overseas tourists.

- There is also evidence of people visiting to walk. Glyndebourne visitors form a significant share of business for some B&Bs and guesthouses in the district. Transit visitors to/from Gatwick and Dover also provide some business for B&Bs and guesthouses.

- The Cuckoo Trail appears to generate very little demand for B&B accommodation.

4.3. Evidence Of Denied Business/Shortages Of Accommodation

- There is evidence that B&Bs and guesthouses in most parts of Wealden (other than Crowborough) are turning away significant levels of business at weekends particularly during the peak summer months. In some instances, business is being denied at weekends over a 6-8 month period and for others this is only for a 6-8 week period. However, some businesses have also noted that they did not turn away as much weekend business in 2008 when compared with previous years.

4.4. Trends in Weekend Occupancies

- Whilst a majority of operators noted that their weekend business has remained fairly static over the last few years, some have noted a drop in weekend demand particularly related to a fall-off in the family leisure market due to the Credit Crunch.

4.5. Trends in Weekend Markets

- There has been no significant variation in weekend markets over the last few years, although some operators did report a fall off in the walking market, the domestic family market and the overseas tourist market, though it is hoped that this situation can be reversed in 2009 with sterling weakening against the Euro.

5. Midweek Demand

5.1. Strength of Demand

- On the whole, mid-week occupancy levels are at their highest during the peak summer season and in some instances are comparable to weekend occupancies during this period. Midweek occupancies are otherwise relatively low at other times of the year.

5.2. Reasons for People Staying Midweek

- Midweek visitors stay in Wealden for a variety of reasons. During the season B&Bs and guesthouses in the district attract leisure break visitors, overseas tourists , people visiting friends and relatives and a share of the Glyndebourne market depending upon their location.

- There is also evidence that B&B and guesthouse operators in Wealden attract some midweek business from contractors and business visitors. These are not significant sources of midweek business however.

5.3. Evidence of Denied Business/Shortages of Accommodation

- With a few exceptions related to a short period in the peak season (i.e. July and August) there is little evidence of business being denied midweek by B&Bs and guesthouses across Wealden.

5.4. Trends in Weekday Occupancies

- Weekday occupancies appear to have remained relatively static over recent years, though some operators have noted a decline in their midweek performance in 2008.

5.5. Trends in Weekday Markets

- Some B&B operators reported a significant decline in demand from the contractors and business markets over the more recent past.

- Recent years have seen a decline in European tourists as a result of the weak Euro against sterling. It is anticipated that this situation may be reversed however for 2009 given the strengthening Euro against sterling.

6. Future Prospects & Plans

- B&B and guesthouse operators in Wealden view the prospects for 2009 and the following number of years as less certain than preceding years, though many remain upbeat about prospects for the B&B and guesthouse sector in the district. The current economic downturn is the primary cause of this uncertainty and advance bookings for 2009 are not as strong as in previous years. It was also felt that the Glyndebourne market might be affected by the current recession.

- However, the following factors were highlighted as offering potential for future business for this sector in the District:

    - Securing of new contracts from the business market e.g. from Parker Pen in Newhaven;
    - Strong repeat business/regular visitors;
    - More European holidaymakers due to strengthening Euro against sterling;
    - Higher share of the domestic holiday market as it will be cheaper to holiday at home;
    - Large number of surrounding wedding venues;
    - Referred business from the Travelodge in Tunbridge Wells;
    - Longer term the 2012 Olympics due to proximity of the district to London.

- It should be noted that not all businesses wish to grow their business as this may result in them exceeding the VAT threshold.

- Two businesses highlighted that they may cease trading in the next few years. This relates to a lifestyle decision and retirement.

7. Other Comments

- Other comments made in relation to Wealden during the course of this survey include:

  - Wealden should be marketed with coastal areas in the South East.
  - Ashdown Forest, National Trust properties and rural countryside are all key draws for visitors and need to be more actively marketed.
  - No case for the council to prevent conversion of B&Bs back to residential properties if business is poor/has been declining.
  - Wealden District Council needs to be more active in marketing the district.
  - Need for improved search engine optimisation in relation to Wealden Council's tourism website.
  - Sufficient accommodation in Crowborough for current demand; no requirement for further accommodation in the town.
  - Advertising in Dover ferry port relates to Kent only and there is nothing related to Sussex, which represents a missed opportunity for accommodation businesses due to transit visitors travelling west through Sussex.

Wealden District – B&B and Guesthouse Survey Participants

- Longleys Farm Cottage - Hailsham
- Spring Cottage, Best Beech Hill – Wadhurst
- The Orchard B&B, High Hurstwood – Uckfield
- Old Mill Farm, High Hurstwood – Uckfield
- New Glenmore, Furners Green – Uckfield
- Netherwood Lodge,-Muddles Green – Nr Lewes
- South Paddock, Maresfield Park -Uckfield
- Holly House, Chelwood Gate – Ashdown Forest
- Bolebrooke Castle & Watermill - Hartfield
- Yew House B&B – Crowborough
- Braemore – Crowborough
- The Coach House – Uckfield
- Iwood B&B – Heathfleld
- Riverdale House B&B – Alfriston
- Wingrove House – Alfriston
- The Beach House – Pevensey Bay

APPENDIX 6

WEALDEN SELF-CATERING SUPPLY

Property	Location	Units	Capacity	Grade	Letting/ Marketing Agency
Ashdown Forest					
3 Shrublands	Crowborough	1	2		Stilwells Cottages Direct
Barn Cottage	Nutley	1	2		Holiday Cottage Group
Belle Croix	Crowborough	1	2	4 star	Garden of England Cottages
Cleeve Lodge	Crowborough	1	4	4 star	Garden of England Cottages
Hodges	Steel Cross, Crowborough	1	3	5 star	
Legg Field Barn	Eridge	1	4	4 star	Garden of England Cottages
Poundgate Park	Crowborough	1	4	4 star	The Cottage Guide
Primula Cottage	Groombridge	1	5	4 star	Garden of England Cottages
The Cottage	Crowborough Hill	1	3	4 star	The Cottage Guide
The Old Cart Lodge	Nutley	1	4	4 star	
The Riding	Crowborough	1	4	4 star	The Cottage Guide
Whitehouse Farm Cottages	Nutley	13	4	2-4 star	
High Weald					
Bardown Farm	Stonegate	3	4	5 star	Premier Cottages
Battenhurst Oast	Stonegate	1	2		
Bewl Water Cottages	Wadhurst	2	2-5	4 star	
Buttons Barn	Wadhurst	1	4		Hideaways
Castle Cottage	Wadhurst	1	8		Freedom Holiday Homes
Chessons Oast/ Stable Cottage	Wadhurst	2	4	4 star	Holiday Cottage Group
Coopers Farm Cottage	Stonegate	1	4	5 star	Premier Cottages
Dewhurst Cottage	Wadhurst	1	4	4 star	Freedom Holiday Homes
Drumsell Lodge	Rotherfield	1	4	3 star	Garden of England Cottages
Fair Oak Farm	Mayfield	3	4-6	4 star	Stilwells Cottages Direct
Greenwood Granary	Heathfield	1	2		
Keepers Lodge	Mark Cross	1	3	4 star	Garden of England Cottages
Little Butts Cottage	Wadhurst	1	8	4 star	Holiday Cottage Group
Stable Cottage	Wadhurst	1	4		Holiday Cottage Group
Streele Farm	Rotherfield	2	2-6	5 star	Premier Cottages
The Coach House	Rushlake Green	1	3	4 star	
The Old Barn	Hadlow Down	1	6	4 star	Freedom Holiday Homes
The Wellbeing Sanctuary	Ticehurst	1	2		

Property	Location	Units	Capacity	Grade	Letting/ Marketing Agency
Low Weald					
Barn Cottage	Blackboys	1	6		Holiday Cottage Group
Batchelors Hall	Isfield	1	2-3		Best of Brighton & Sussex Cottages
Beechcroft	Cowbeech	4	2-6	5 star	Premier Cottages/ Rural Retreats
Boring House Farm	Vines Cross	1	5		
Cannon Barn	Vines Cross	1	10	4 star	Freedom Holiday Homes
Chestnut Cottage	Uckfield	1	4		Holidaylets.net
Collins	Herstmonceux	1	4		Fairhaven Holiday Cottages
Cowbeech Cottage	Cowbeech	1	5-6	4 star	Holiday Cottage Group
Decoy Cottage	Laughton	1	4		Hoseasons
Dill Hundred	Vines Cross	1	8		Holiday Cottage Group
Down Oak Cottage	Downoak	1	2-4		The Cottage Guide
Friesian/ Dairy Shorthorn Cottage	Vines Cross	2	6-7	4 star	Freedom Holiday Homes
Furnace Lane Stable	Horam	1	2	4 star	Garden of England Cottages
Great Steele Farm Cottage	Framfield	1	8	4 star	Holidaylets.net
Horseshoes Farm House	Buxted	1	6		Hoseasons
Hurstwood Farm	High Hurstwood	1	2/4	4 star	
Jasmine Windmill	Hailsham	1	6	4 star	Freedom Holiday Homes
Kingfisher Lodge	Laughton	1	8		The Cottage Guide
Laughton Granary	Laughton	1	3		Fairhaven Holiday Cottages
Little Marshfoot	Hailsham	1	4	4 star	
Little Tamberry	Halland	1	2	4 star	Freedom Holiday Homes
Mallingdown Oast	Piltdown	1	4	4 star	The Cottage Guide
Millers Farm Cottage	Dallington	1	4	4 star	Garden of England Cottages
Minden Cottage	Fletching	1	4	3 star	Holiday Cottage Group
Morphews Cottage	High Hurstwood	1	6		Holiday Cottage Group
Nursery Cottage	Herons Ghyll	1	3		The Cottage Guide
Old Keepers House	Uckfield	1	9		Fairhaven Holiday Cottages
Paines Oast Cottage	East Hoathly	1	4		Hoseasons
Pekes	Golden Cross	6	4-20	3-4 star	
Ruttingham Cottage	Piltdown	1	4		
Sayerland Cottage	Polegate	1	4		Holidaylettings
Sunnymead Cottages (Pippins/Russets)	High Hurstwood	2	2		Holiday Cottage Group
The Annexe, Little Bucksteep	Dallington	1	2		Mulberry Cottages
The Barn, Hendall Manor Farm	Herons Ghyll	1	4		The Cottage Guide
The Cart Lodge	Buxted	1	6-9		Holiday Cottage Group
The Dairy	Hailsham	1	4		Fairhaven Holiday Cottages

The Games Barn, Cranesden Farm	Mayfield	1	8	3 star	
The Granary, Barton Mill Nurseries	Boreham Street	1	4	4 star	
The Granary, Huggetts Farm	High Hurstwood	1	2-5	4 star	The Cottage Guide
The Granary	Laughton	1	3-4	4 star	Freedom Holiday Homes
The Hovel and the Hop House	Windmill Hill	2	4	4 star	Garden of England Cottages
The Oast	Bodle Street Green	1	7		Fairhaven Holiday Cottages
The Old Barn	Hadlow Down	1	6	4 star	
The Old Orchard Bungalow	Hailsham	1	12		Holidaylets.net
The Old Spinney	Hailsham	1	12		Holidaylets.net
The Stable	Hailsham	1	2		Stilwells Cottages Direct
The Stables, Home Farm	Herons Ghyll	1	6	4 star	Freedom Holiday Homes
The Studio Sanctuary	Rushlake Green	1	2		
Tom's Lodge	Fairhazel, Uckfield	1	2	3 star	
Well Cottage	Warbleton	1	2	4 star	Garden of England Cottages
White Lion Farm Cottages	Shortgate	2	2-4	3 star	Best of Brighton & Sussex Cottages
South Downs					
Beachy Head Cottage	East Dean	3	4-6	4 star	
Danny Cottage	Alfriston	1	6	5 star	
Darwin Cottage	Jevington	1	4		Hoseasons
Flint Cottage	Alfriston	1	4		
Forest Cottage	Friston	1	4		Stilwells Cottages Direct
Myles Cottage	Alfriston	1	3-4	3 star	Holiday Cottage Group
Oak Cottage	Jevington	1	4		Hoseasons
Old Inn House	Wilmington	1	5		Holidaylets.net
Polhills	Arlington	1	4		Stilwells Cottages Direct
Rose Cottage Inn	Alciston	1	2	3 star	Freedom Holiday Homes
Southdown Barn Annexe	Alciston	1	2	3 star	Freedom Holiday Homes
The Dene	Alfriston	1	10		Rural Retreats
The Stables	Friston	1	5-6		The Cottage Guide
Winton Barn Annexe	Alfriston	1	3		
Wishing Well Cottage	Wilmington	1	2	4 star	The Cottage Guide
Wood Barn	Folkington	1	6		
W40620	Jevington	1	2-4		Holiday Cottage Group

Property	Location	Units	Capacity	Grade	Letting/ Marketing Agency
Pevensey Bay					
4 High Beach Court	Pevensey Bay	1	4	3 star	
Beachside	Norman's Bay	1	4		Hideaways
Coast Lodge	Pevensey Bay	1	2-3	4 star	Holiday Cottage Group
Fisherman's Cottage	Norman's Bay	1	4		Hideaways
Montana	Pevensey Bay	1	4		Chester Lettings
Seaview Cottage	Norman's Bay	1	2		Stilwells Cottages Direct
Silverbeach	Pevensey Bay	1	8		Stilwells Cottages Direct
The Coach House	Pevensey	1	3		Fairhaven Holiday Cottages
Winterborne	Pevensey	1	5		Holidaylets.net
W40200	Pevensey Bay	1	3		Holiday Cottage Group

APPENDIX 7

WEALDEN - TOURING CARAVAN & CAMPING SITES – JANUARY 2009

Site	Grade	Seasonal Touring Pitches	Touring Pitches	Tent Only Pitches	Statics for Hire
Ashdown Forest					
Crowborough Camping and Caravanning Club Site	4 star		90		
Renhurst Farm, Mark Cross			25		
St Ives Farm, Hartfield			15	30	
Stairs Farm, Hartfield	Certificated		5		
High Weald					
Cedar Gables, Wadhurst			25		
Low Weald					
Bentley Wildfowl & Motor Museum, Halland	Certificated		5		
Broomfield Farm Caravan Club Site, East Hoathly			76		
Cider House Farm Camping Park, Blackboys			28		
Heaven Farm, Furners Green			15	10	
Hidden Spring Vineyard, Horam			10	10	
Honeys Green Caravan Park, Halland	3 star		22		6
Horam Manor Touring Park	4 star		90		
Peel House Farm Caravan Park, Polegate			20		11
The Homestead, Hailsham	Certificated		5		
The Old Barn Farm, Herstmonceux	Certificated		5		
South Downs					
Pevensey Bay					
Bay View Park, Pevensey Bay	3 star		95		5
Castle View Caravan Site, Pevensey Bay			75		
Fairfields Farm Caravan & Camping Park, Westham	3 star		60		
Normans Bay Camping and Caravanning Club Site	4 star		200		

APPENDIX 8

WEALDEN - CAMPING SITES – JANUARY 2009

Site	Grade	Tent Pitches
Ashdown Forest		
High Weald		
Dernwood Farm Wild Camping		12
Low Weald		
Merrylands, Lower Dicker		15
South Downs		
Alfriston Camping Park, Alfriston		40
Ash Farm, Filching		10
Pevensey Bay		

APPENDIX 9

WEALDEN – HOLIDAY PARKS – JANUARY 2009

Site	Grade	Owned Statics/ Units	Statics/ Units for Hire	Seasonal Touring Pitches	Touring/ Tent Pitches
Ashdown Forest					
High Weald					
Greenviews Caravan Park, Heathfield		51			20
Low Weald					
Barley Mow Park, Uckfield		17			
Bluebell Holiday Park, Shortgate		5			
Old Mill Holiday Park, Golden Cross	4 star	18			12
Orchard View Park, Herstmonceux	5 star	61	2		
South Downs					
Pevensey Bay					
Glyndley Manor Cottages, Stone Cross		9	25		
Grey Tower Caravan Park, Pevensey		73			10
Martello Beach, Pevensey Bay		244	12		
Normans Bay Caravan Park		174			

APPENDIX 10

WEALDEN LOCAL PLAN TOURISM ACCOMMODATION POLICIES 1998 (ADOPTED) & 2005 (NON-STATUTORY)

HOTELS

1998

TR7

Proposals for new commercial roadside facilities along primary routes outside the development boundaries, as defined on the Proposals Map, will not be permitted within the High Weald and Sussex Downs Areas of Outstanding Natural Beauty or the Coastal Levels. Elsewhere such proposals will only be permitted
on primary routes outside the development boundaries, as defined on the Proposals Map, if the following criteria are met:

(1) a need can be demonstrated for both the proposed facilities and the particular location that cannot be met by either existing or planned
facilities;
(2) where appropriate, the Council will encourage a comprehensive range of both commercial and non-commercial facilities to be provided;
(3) the layout and form of development and use of materials should respect the character and appearance of the locality and ensure an appropriate standard of amenity within the site;
(4) substantial landscape planting, including buffer strips an sumounding, shall be provided along the site boundaries prior to the completion of development, wherever practicable.

TR8

Proposals for new commercial roadside facilities and the large scale expansion of existing facilities along non-primary routes outside the development boundaries, as defined on the Proposals Map, will be resisted. Proposals
for small scale extensions and the redevelopment of existing facilities may be permitted where the criteria set out in Policy TR7(3) and (4) are met.

2005

TM2

Existing overnight accommodation in hotels, motels, guest houses and bed and breakfast establishments will be safeguarded and their change of use to other purposes will not be permitted except where: -

(1) it is satisfactorily demonstrated that the premises, with or without adaptation, are no longer capable of viable economic use for overnight accommodation;
(2) it is demonstrated that there is no demand at present or likely to arise in the foreseeable future to justify continuation of the existing use.

TR4

Proposals for new roadside facilities and the large-scale expansion of existing facilities will only be permitted to serve non-primary routes where they are within a development boundary.
All proposals, including the small-scale expansion or redevelopment of existing roadside facilities outside development boundaries, will only be permitted, subject to the following criteria:

(1) the layout and form of development and use of materials should respect the character and appearance of the locality and ensure an appropriate standard of amenity within the site; and
(2) substantial landscape planting, including buffer strips and mounding shall be provided along the site boundaries wherever practicable, prior to the completion of development.

PUB ACCOMMODATION

1998

EN27

Proposals for development will be permitted when the following layout and design criteria are met:-

(1) the scale, form, site coverage, density and design of the development and the use of materials and landscaping should respect the character of adjoining development and, where appropriate, promote local distinctiveness. The design, materials and landscaping should be of an appropriate high standard;
(2) the proposed development should not create an unacceptable adverse impact on the privacy and amenities of adjoining developments and the neighbourhood by reason of scale, height, form, noise and traffic movements;
(3) the proposed development should ensure a satisfactory environment for the future occupants, including adequate provision for daylight, sunlight, privacy, garden space and/or appropriately landscaped amenity areas;
(4) the proposed development should not constitute an unacceptable backland or 'tandem' form of development;
(5) regard has been paid to crime prevention measures whenever possible and appropriate.

SELF-CATERING

1998

DC7

Proposals for non-residential development (including workshops, offices, tourist accommodation and recreational use) through the conversion of agricultural or other rural buildings in the countryside (outside the development boundaries as defined on the Proposals Map) will be permitted where the building's form, bulk and general design are in keeping with its surroundings. In addition, all proposals should meet the following criteria:

(1) the building is of sound construction and capable of conversion without significant rebuilding, or extension. The Council may require this to be demonstrated through the submission of a structural survey;
(2) any proposed alterations to the building (e.g. fenestration, doors, internal subdivision) or to its associated operational area (e.g. parking, storage) would not harm its appearance as a rural building or adversely affect the rural setting of the building in the locality;
(3) the nature and intensity of the proposed use would be compatible with its rural location;
(4) the proposed use would not adversely affect the residential amenities of the neighbourhood, particularly by reason of noise, disturbance and fumes;
(5) the proposed use would not create an unacceptable impact on the local road network and there is a satisfactory means of vehicular access and parking arrangements;
(6) proposals which would be likely to create a significant number of jobs should be well located in relation to towns and villages.

2005

DC7

Proposals for non-residential development (including workshops, offices, tourist accommodation and recreational use) through the conversion of agricultural or other rural buildings in the countryside (outside the development boundaries as defined on the Proposals Map) will be permitted where the building's form, bulk and general design are in keeping with its surroundings. In addition, all proposals should meet the following criteria:

(1) the building is of sound construction and capable of conversion without significant rebuilding, or extension. The Council may require this to be demonstrated through the submission of a structural survey;
(2) any proposed alterations to the building (e.g. fenestration, doors, internal subdivision), its associated operational area (e.g. parking, access, storage, provision of services, amenity space and outbuildings) would not harm its appearance as a rural building or adversely affect the rural setting of the building in the locality;
(3) the nature and intensity of the proposed use would be compatible with its rural location;
(4) the proposed use would not adversely affect the residential amenities of the neighbourhood, particularly by reason of noise, disturbance and fumes;
(5) the proposed use would not create an unacceptable impact on the local road network and there is a satisfactory means of vehicular access and parking arrangements;
(6) proposals which would be likely to create a significant number of jobs should be well located in relation to towns and villages or be readily accessible by public transport.

TOURING CARAVAN AND CAMPING SITES

1998

TM6

Within the Ashdown Forest (defined as the area enclosed by the boundary of the Medieval Pale of 1372) proposals for touring caravan and camping facilities will be strongly resisted.

TM7

Within the Sussex Downs Area of Outstanding Natural Beauty and the Coastal Levels, proposals for touring caravan and camping facilities will be strongly resisted, with the exception of small sites for lightweight tents. Extensions to existing sites may be permitted if this would result in better layouts and landscaping.

TM8

Outside of the areas identified in Policies TM6 and TM7, proposals for new or extended touring caravan and camping facilities will be permitted where the following criteria are met:

(1) there is good accessibility from the primary or secondary route network, but preferably no direct access onto a primary or trunk road;
(2) the size and scale of the proposal would be compatible in terms of appearance and intensity of use with its location;
(3) the proposal would not be visually intrusive in the landscape and would be well screened by existing vegetation, particularly in locations within or adjacent to Areas of Outstanding Natural Beauty;
(4) the proposal would be adequately landscaped, both within and around the site;
(5) on large sites, adequate provision would be made for the recreational needs of site users; made for the recreational needs of site users;
(6) the proposal would not result in an unacceptable concentration of caravan or camping sites;
(7) in the case of extensions, the proposals should result in an improved layout and landscaping.

Within the High Weald Area of Outstanding Natural Beauty, particular care will be taken to ensure that proposals respect and maintain the landscape character in accordance with Policy EN6.

2005

TM3

Proposals for the change of use of touring pitches to static pitches, will not be permitted**.**

TM4

Proposals for new or extended touring caravan, and camping facilities will be permitted where the following criteria are met:
(1) there is good accessibility from the primary or secondary route network, but the proposal would not create a new direct access or intensify use of an existing access onto a trunk road, nor preferably onto a primary road;
(2) the size and scale of the proposal would be compatible in terms of appearance and intensity of use with its location;
(3) the proposal would not be visually intrusive in the landscape and would be well screened by existing vegetation, particularly in locations within or adjacent to Areas of Outstanding Natural Beauty;
(4) the proposal would be adequately landscaped, both within and around the site;
(5) on large sites, adequate provision would be made for the recreational needs of site users;
(6) the proposal would not result in an unacceptable concentration of caravan or camping sites;
(7) in the case of extensions, the proposals should result in an improved layout and landscaping;
(8) within the Sussex Downs Area of Outstanding Natural Beauty and the Coastal Levels, only proposals for small sites for lightweight tents will be permitted, in appropriate locations;
Within the Ashdown Forest (as defined on the Proposals Map), proposals for touring caravan and camping facilities will not be permitted.

STATIC CARAVAN AND HOLIDAY PARKS

1998

TM5

Proposals for new static caravan sites for holiday purposes, or the change of use of touring pitches to static pitches, will not be permitted. Proposals for extensions to such sites may be permitted if this would result in better layouts and landscaping.

2005

TM5

The change of use of static holiday caravans to residential mobile homes will not be permitted.

APPENDIX 11

EXTRACTS FROM THE WEALDEN CORE STRATEGY ISSUES & OPTIONS CONSULTATION PAPER

Tourism Section

Tourism

3.29 Tourism, hotels and catering are the main employment sectors in the District. There are a number of small-medium scale tourist attractions in the District, such as Pooh Corner, Drusillas and Michelham Priory, but the tourist potential of some assets (such as Herstmonceux Castle) are relatively unexploited. The District is also a centre for quiet informal countryside recreation and sustainable tourism, making use of its high quality countryside and attractive villages. The South Downs attracts large numbers of day visitors, and the Ashdown Forest, in the North of the District is also popular as a tourist destination.

Spatial Vision

Preliminary Spatial Vision

By 2026 in Wealden District:

Its beautiful landscape of Weald, Forest and Down, Coast, Level, Village and Town, will be preserved and enhanced for future generations. Development and land management will flow from the potential of landscape and place in innovative and sustainable ways.

Necessary development for homes, employment, tourism & farm diversification, new community facilities & enhanced infrastructure will be sensitively integrated into this landscape. Growth will be focused where it will be accessible, most sustainable and most benefits the objectives set for that place.

Wealden will be a constellation of small towns and villages working together. These and their rural surrounds will be made better places to live, and affordability of housing will be increased.

There will be increased economic momentum. It will be a place for small businesses to start and grow and for all businesses to invest. In particular the Eastbourne/Hailsham triangle will have become the South Coast choice for investment.

It will be a place where its dispersed community will have better services to improve health and social well being, as well as reduced crime and fear of crime.
It will be a much better connected place. The Wealden Line will be reopened with direct rail links to Tunbridge Wells and the South Coast, there will be a safer and less congested A26(T); North-South (A22) through road traffic will continue to be discouraged.

Spatial Objectives

The Strategy for Wealden must contain a series of spatial objectives which should be derived from the spatial vision and be clearly defined and measurable. They should build upon national and regional planning policy objectives as well as having regard to other development plan documents. It is best practice that where possible objectives should be SMART objectives – that is Specific, Measurable, Achievable, Realistic and Time Limited.

8.13 Considering the draft vision, the following preliminary local spatial objectives are put forward.

Objective SO1

To protect, properly manage and enhance the nationally designated landscapes of the High Weald Area of Outstanding Natural Beauty, Sussex Heritage Coast and the Proposed South Downs National Park, whilst appropriately integrating development to meet local needs.

Objective SO2

To protect the countryside, to maximise the use of previously developed land, and make full and efficient use of land, ensuring at least 60% of new housing is on previously developed land and that at least 75% of new residential development is at a density of at least 40 dwellings per hectare.

Objective SO3

To enhance the biodiversity and geodiversity of Wealden, meeting local biodiversity action plan targets and protecting locally and nationally designated sites of nature conservation importance; in particular the internationally important sites of the Pevensey Levels and Ashdown Forest.

Objective SO4

To ensure that the built heritage of the Sussex Countryside and Towns, which is nationally important, is protected and enhanced for future generations.

Objective SO5

To meet the requirements for additional housing as set out in the South East Plan and ensure that the minimum target in the plan for provision of affordable housing is met.

Objective SO6

To increase visitors staying in Wealden, focusing on sustainable tourism, whilst ensuring that the tranquillity and beauty which attract people to the area is not undermined

Objective SO7

To ensure a step change in the quality of urban and rural design in Wealden through application of policies in the new plan and the principles set out in the Wealden Design Guide.

Objective SO8

To work with partners to help ensure that Wealden remains a safe place, with levels of crime and disorder well below the national mean.

Objective SO9

To work with partners to effectively meet the health and lifelong learning needs of a widely dispersed population.

Objective SO10

To broaden the weak retail offer of the District's Towns through meeting the need for additional comparative goods floorspace and additional convenience goods floorspace by 2016.

Objective SO11

To ensure that by 2026 no Super Output Areas within Wealden District are in the 15% most deprived areas within England.

Objective SO12

To increase the GVA (Gross Value Added) of the District.

Objective SO13

To reduce the shortfall of open space, leisure and recreational facilities in the District, providing quality parks in or adjoining each of the District's towns by 2026.

Objective SO14

To take full account of the local impacts of climate change and to ensure that development is 'carbon neutral' and sustainable as far as practically possible.

APPENDIX 12

SOUTH EAST PLAN – TOURISM ACCOMMODATION POLICIES

Regional policies for tourism are set out in the emerging **South East Plan**. These policies were developed initially in 'Destination South East', a land-use and planning strategy for the tourism industry that was approved in November 2004 as a formal alteration to RPG9. RPG9 has now become the adopted Regional Spatial Strategy as amended in November 2004, and is being rolled forward as the South East Plan, which was submitted to Government in March 2006. The final document is expected to be published in Autumn 2008[1]

RPG9 and the emerging South East Plan incorporate specific policies relating to the tourist accommodation sector. These policies seek to:

- Facilitate a consistent approach to planning for accommodation
- Ensure planning policies reflect both the diversity of the sector and market reality
- Provide clear guidance on the location of development.

These policies are set out in TSR5. Part i) sets out six aspects of tourist accommodation that should be addressed in development plans, whilst Part ii) advocates that the Regional Tourist Board and local authorities should jointly monitor the demand for and supply of accommodation. The policies are detailed below.

[1] The South East Plan was submitted to Government in March 2006; consultation on the Plan ended in June 2006, and an Examination in Public took place between November 2006 and March 2007, publishing its findings in November 2007. The Secretary of State is at the time of writing considering the recommendations of the Panel Report and proposed changes will be published in July 2008, subject then to a 12 week consultation period. The Government response is expected in Spring 2009.

POLICY TSR 5

The diversity of the accommodation sector should be positively reflected in tourism and planning policies.

i) *In formulating planning policies and making decisions local planning authorities should:*

1. *Consider the need for hotel developments to be in the proposed location, including links with the particular location, transport interchange or visitor attraction, and seek measures to increase access by sustainable transport modes.*
2. *Provide specific guidance on the appropriate location for relevant accommodation sub-sectors. This should be informed by their different site requirements and market characteristics and how these relate to local planning objectives.*
3. *Encourage the extension of hotels where this is required to upgrade the quality of the existing stock to meet changing consumer demands.*
4. *Include policies to protect the accommodation stock where there is evidence of market demand.*
5. *Strongly encourage the provision of affordable staff accommodation as part of new and existing accommodation facilities in areas of housing pressure. The criteria for the application of such a requirement should be clearly set out in the development plans.*
6. *Facilitate the upgrading and enhancement of existing unserviced accommodation, including extensions where this will not harm landscape quality or identified environmental assets and encourage the use of accommodation throughout the year for holiday purposes. Particular attention should be paid to identifying suitable sites for the relocation of holiday parks under threat from coastal erosion or flooding.*

ii) *Tourism South East and local authorities should, working together, undertake active monitoring of the demand for and supply of tourism accommodation on a regional and sub-regional basis.*

These general principles are adopted in a statutory document and as such have the same status as a Local Plan. They seek to guide local authorities in the completion of current Local Plans and the preparation of the new Local Development Frameworks.

The emerging South East Plan and its predecessors have identified a number of issues that inform this policy, including:

- Development plans should be based on a thorough understanding of the needs of accommodation developers and operators and the demands of their markets.
- This should be built upon an on-going dialogue between planners and the industry.
- And supported by regular monitoring and assessment of both demand and supply.
- Existing stock may need to extend to meet the expectations of the modern day market.
- There is a real pressure for residential conversion should existing accommodation supply not be able to re-position and compete.
- Visitor accommodation – serviced and unserviced - is an important component in encouraging sustainable tourism through generating longer stays, more expenditure and linkages to other tourism opportunities.
- Although hotels are ideally suited to town centre locations hotel developers find it difficult to compete with land values in many urban areas.
- Mixed-use developments may be the only way to achieve town centre hotel development.
- The exceptions to sequential testing for hotels out of town are country house hotels and provision associated with key transport gateways and regionally significant visitor and sporting attractions, although hotels serving markets that don't need to go into a town centre, e.g. one-night stopovers, may also be better located on the outskirts of towns.
- There is an on-going need for staff accommodation in association with serviced and unserviced accommodation in the South East due to a lack of affordable housing.
- Attractive self-catering units in rural areas come under pressure to convert to residential use and should be protected where there is evidence of demand.

- There will be an increasing demand for improvements to existing holiday parks as market expectations change – especially in coastal locations – and sites may need significant expansion to facilitate quality improvement; this should be considered favourably where there is evidence of existing or potential demand, subject to environmental impacts.

APPENDIX 13

**HOTEL SECTOR PLANNING POLICY GUIDANCE
ISSUED BY TOURISM SOUTH EAST**

Hotel Sector Planning Policy Guidance

Tourism South East has worked with Hotel Solutions and partner local authorities in the South East Region on a number of accommodation studies over the past 8 years. These studies have resulted in a series of best practice planning guidance documents being produced which are intended to aid Local Authority Planning, Tourism and Economic Development Units in shaping future policy and action with regard to the accommodation sector. Here we provide a summary of each and reference the source material that can be accessed via the Tourism South East website.

'Here To Stay' – Tourist Accommodation Retention and Loss (October 2006, Tourism South East)

This document looks at the case for retaining tourist accommodation and various approaches to accommodation retention policy across a range of destinations. It then identifies key issues and guiding principles relating to retention policy and sets out an evaluation tool that can be used by local authorities and adapted as required to local circumstances.

With more and more cases going to appeal, particularly where a residential permission is likely to deliver a hotel owner a significantly higher return than the sale of the property as a going concern, many local authorities have recognised the need to tighten up their policies and procedures.

It is worth highlighting here the key retention policy planning principles that should guide policy preparation in this area. Policies should be:

- **Well-defined and transparent -** clearly spelled out in terms of the rationale behind the policy and how it will be implemented.
- **Consistently applied -** out of fairness to applicants but also so that Officers, Members, Inspectors and applicants/their advisors cannot challenge the Council in its approach.
- **Objective** – criteria/evidence-based **-** criteria-based policies seem to be the way forward, and provide a set of requirements that the applicant must respond to and provide evidence against.
- **Economically realistic -** viability is at the core of many of the change of use arguments requiring an understanding by the Council and Inspectors of the economics of hotel operation.
- **Reasonable** - in terms of knowing when to let establishments go, both in terms of the individual circumstances surrounding a property and the contribution it is making to the bigger picture.
- **Related to prioritised needs of the destination -** in terms of identified core areas where it is desirable that accommodation is retained.
- **Linked to tourism strategy** - to support identified market priorities and priorities for the location of development/investment.
- **Flexible** - responsive to changes in the market, the economy and the destination (albeit that timeframes may require determination).
- **Market-led -** which requires the monitoring of market and performance trends.
- **Should not perpetuate accommodation for which there is no market -** again requiring an understanding of market needs and the required product response.

- Based on **consultation with the local tourism/hotel industry**.

Application of these principles requires a local authority to:

- Think through how the implementation of policies will impact on the destination;
- Set out clearly the criteria and evidence to be presented by any change of use applicant;
- Have the support tools and data to be able to debate and indeed where required counter the argument being put forward by the applicant with the benefit of commercial assessments and advice.

The starting point for developing the policy approach and system for evaluation should be a clear vision for the destination and the role the accommodation sector plays in this. What are the accommodation needs of different markets and where should this be located? What mixture of new development, retained stock and managed loss will best achieve this? This needs to be based upon sound market evidence and not unrealistic aspirations.

In relation to retention, the evaluation tool set out in the guidance identifies:

- **the criteria against which applications should be assessed**, principally:
    - proof of marketing for sale;
    - evidence of business performance;
    - evidence of professional management;
    - evidence of attempts to save the business.
- **the type of evidence sought from applicants** to demonstrate that they meet these criteria – or otherwise, including:
    - Independent valuation;
    - Sale marketing materials and responses ;
    - Accounts;
    - Occupancy and Achieved Room Rate data;
    - Business Plans;

  - Marketing Plan, schedule and brochures;
  - Investment schedule and plans;
  - Details of plans to up-grade/re-position with full costings.

- **the response required from the Local Authority, including sources of information and expertise**, which could include:
  - Tourism Strategy inputs/consultation with Tourism Team;
  - Independent property valuations/local agent inputs on hotel sales;
  - Monitor of supply, loss and development;
  - Monitor of demand across the destination and by area;
  - Assessment of hotel standards and fit for purpose;
  - Benchmark data on business performance by size and type;
  - Accountancy inputs on viability of current and potential schemes;
  - Surveyor inputs on required investment costs.

Attracting Hotel Investment (Tourism South East, 2004)

Tourism South East has also issued planning guidance to Local Authorities on attracting Hotel Investment. The guidance identified four cornerstones of good practice in attracting hotel investment:

- Effective communication;
- Positive planning;
- Pro-active inward investment;
- Market-focused monitoring.

The key recommendations from this as appropriate to the potential identified in Coastal West Sussex have been built into the 'Moving Forward' section of this report.

'Room At The Inn' – Local Authority Planning Guidance on Developing Rural Pub Accommodation (Tourism South East, 2004)

This guidance provides information on:

- the pub accommodation sector and key industry trends;
- the performance and potential of the pub accommodation product;
- the key drivers to success;
- the issues surrounding the development of pub accommodation;
- the barriers to investment and how local authorities can help to overcome these.

Its intent is to help local authorities recognise the potential of rural pub accommodation development, inform future policy development and assist with decision-making on pub accommodation planning applications.

The guidance identifies 5 areas where local authorities can act to create the framework for the sector to develop involving:

- Greater awareness of the potential and disseminating this;
- Improved information about the sector and its performance, at a local level;
- A more responsive approach to planning, highways and signage;
- Greater flexibility in planning and design and the adoption of reasonableness and a co-operative approach between investor and planning authority;
- More focused and integrated support for pub accommodation, in terms of planning, business advice, marketing and financial assistance.

APPENDIX 14

EXTRACT FROM DCLG GOOD PRACTICE GUIDE ON PLANNING FOR TOURISM

Tourist Accommodation

1. Tourism accommodation takes many different forms, including hotels, guesthouses and bed and breakfast premises, self-catering, touring and static caravans and camping, and caters for a variety of tastes and budgets. But all are capable of bringing economic benefits to the areas in which they are located. These benefits will need to be assessed alongside other issues such as suitability of the location in terms of its sustainability.

2. The issues that will need to be addressed in considering planning applications or tourist accommodation will vary according to the type, size, and nature of the accommodation being provided. These are considered further below.

Hotel and serviced accommodation

GENERAL LOCATIONAL PRINCIPLES

3. The process of identifying suitable locations for hotel and serviced accommodation, whatever its nature, should be an integral part of the plan making process. Local planning authorities and the tourist industry should therefore engage constructively to identify suitable locations in plans for hotel accommodation to meet identified current and future needs. This is particularly important for major hotels – for example those with business, conference and banqueting facilities, or large hotels catering for tourists – where the preference should be to identify town centre sites wherever possible, in line with national policies set out in PPS6. Such sites are the most sustainable in planning terms, since they allow greater access by public transport, contribute to urban vitality and regeneration, and allow visitors to easily access other town centre facilities and attractions. Where proposals for major hotel facilities come forward outside the development plan process, their location should be assessed in line with the policies in PPS6 and the sequential approach to site selection.

4. Proposed locations for other types of hotel and serviced accommodation should also be considered through the plan process wherever possible. The emphasis, whatever the type of accommodation, should be on identifying the most sustainable locations, having regard to national planning policies. But in allocating sites in plans, or considering planning applications that come forward outside of the plan process, developers and planning authorities need to recognise that the particular market being met by the accommodation may influence the nature of the location chosen. So, for example, accommodation catering for those seeking to enjoy the natural environment through walking and outdoor recreation may be better located in a rural area, in or at the edge of the centre of a village or small town, rather than in a major town centre some distance away from the attractions it serves.

5. Whatever the type of hotel or serviced accommodation and whatever Its location, it should:

   - Fit well with its surroundings, having regard to siting, scale, design, materials and landscaping; and
   - Be in harmony with the local environment (taking account of, amongst other factors, residential amenity, noise, traffic and parking in the vicinity).

HOTEL ACCOMMODATION IN RURAL AREAS

6. National planning policies set out in PPS7 *Sustainable Development in Rural Areas* makes it clear that the expectation is that most tourism accommodation requiring new buildings should be located in, or adjacent to, existing towns and villages. PPS7 also recognises that proposals to convert existing rural buildings to provide hotel and other serviced accommodation should be acceptable, subject to any general criteria that may be set in development plans on the re-use of such buildings.

7. National Parks and Areas of Outstanding Natural Beauty attract visitors who wish to enjoy the special qualities of the landscapes and the countryside of these areas. It is important that sufficient accommodation of a suitable range of types is provided for these visitors. However, particular care needs to be taken over the number, scale and location of accommodation facilities in these designated areas to ensure that the particular qualities that justified the designation are conserved. These considerations are best addressed through the plan process wherever possible.

HISTORIC TOWNS AND CITIES

8. Historic towns and cities are an attraction to tourists from home and overseas and there is pressure to increase hotel accommodation in them. Great importance is attached to the preservation of buildings of architectural or historic interest both for their intrinsic qualities and for the contribution they make to our towns and villages, and to tourism. It is therefore important that any proposals for new hotel accommodation in such towns and cities are sensitive to their surroundings.

9. Conversion into hotels is often a realistic proposition for ensuring the retention and maintenance of historic buildings provided it is sensitively handled, does not materially alter the character or historic features of the building, and provided the new use does not generate traffic movements which cannot be accommodated.

10. Many historic buildings in town and country are already in use as hotels. If carefully designed, additions can be achieved without adversely affecting the historic fabric or character and maintain the historic building in viable use. But large-scale buildings in a small-scale setting, buildings which adversely affect the existing skyline, and those which by their design, materials, illumination or building line are out of sympathy with neighbouring historic buildings will normally be unacceptable.

MODERNISATION AND EXTENSIONS

11. Aside from historic buildings, there are many redundant or semi-obsolete buildings – such as closed mills, distilleries, warehouses, or railway stations – that can lend themselves well to adaptation and modernisation as hotels, other forms of serviced accommodation or restaurants. To convert such buildings to compatible use can bring life back to an otherwise wasted asset – thus conserving a useful and often attractive building, improving a neglected site and helping the local economy.

12. Similarly, moderate-sized extensions to an existing hotel or public house, including the addition of bedroom accommodation, can help to ensure the future viability of such businesses. This may satisfy a local need as well as a tourism one, by fully utilising the potential of the site but without any disproportionate increase in scale. In all cases, careful consideration should be given to ensure that the size of the extension proposed is not disproportionate for the location concerned.

BUDGET HOTELS, MOTELS, AND TRAVEL LODGES

13. Where budget hotels are designed to cater for longer stays at a destination (for example, those catering for visitors to historic towns and cities), their location should be considered in light of policies in the development plan and national policies in PPS6 on town centres. Location of such hotels in town centres maximises the opportunities for visitors to easily access other town centre facilities and attractions.

14. Other types of budget hotels and similar types of development such as motels and travel lodges cater more for car-born travellers, often for a single overnight stay – e.g. business travellers en-route to a destination. In such cases, the preference of developers will be for sites on major traffic routes outside of the centre of large towns or tourist centres. However the aim should be to make any development as sustainable as possible, and it will not normally be appropriate for such developments to be located in open countryside away from major settlements. Edge of town centre locations, for example on a ring road or on a major route out of the town centre, will usually be the most appropriate locations if a town centre location is not suitable, available or viable.

15. For out-of-centre locations, design and layout of the development is likely to be of considerable importance in deciding whether it is acceptable in planning terms. Depending on the setting, an open layout in which careful attention has been paid to achieving a high standard of design and landscaping is likely to be more acceptable than a dense concentration of buildings.

16. Where a proposal includes other new facilities, such as a petrol station or shop, these will have to be considered on their own merits. If they are objectionable in themselves, the fact that they are combined with a hotel will not remove the objections. Restaurants, fast food outlets, leisure, fitness and other facilities open to the general public as well as residents are also sometimes combined with hotel proposals, in which case the extra traffic they are likely to generate and its effect on the highway must also be taken into account.

CAR PARKING

17. Maximum car parking standards for hotel and serviced accommodation may be included in development plans. Where such standards are not included in plans, planning authorities will need to consider what are appropriate levels of parking, based on the market which the hotel serves, its location and availability of public transport facilities. In addition, for those hotels where a substantial part of the parking needs are attributable to public rooms used mainly for functions which attract non-residents, then the availability of public parking in the vicinity of the hotel will also need to be taken into account.

18. Planning authorities should also take account of the proposed arrangements for service loading and unloading and setting down space for visitors. Organised tours demand adequate loading and unloading facilities for coaches. Access and waiting areas should be designed with this in mind. Access points should be sited so as to minimise turning movements across traffic and to avoid congestion of the highway caused by vehicles queuing to pick up or drop passengers. Developers should discuss proposed access arrangements with the highway authority at the earliest possible stage.

Holiday, touring caravan, and chalet parks

19. In the UK as a whole, the parks industry accounts for tourist spend of some £3.23 billion[1]each year, accommodating some 22% of all holiday bed nights. The industry comprises holiday chalets, caravan holiday homes, pitches for touring caravans, motor-homes and tenting and all types of self-catering accommodation. Holiday parks are the largest provider of rural tourism bed spaces.

20. PPS7 provides advice for planning policies and development proposals for static holiday and touring caravan parks and holiday chalet developments. Planners should carefully weigh the objective of providing adequate facilities and sites with the need to protect landscapes and environmentally sensitive sites. They should examine the scope for relocating any existing visually or environmentally-intrusive parks away from sensitive areas, or for re-location away from sites prone to flooding or coastal erosion. However, the high land values associated with holiday parks, the cost of infrastructure and possible

[1] UKTS 2002

planning issues relating to a proposed site may make such proposals impractical and unviable.

21. This advice recognises that planning provides an opportunity to improve the attractiveness of such developments to those who visit them and as features in the landscape. The *Environmental Code for Holiday parks, Caravan and Camping Sites, and Park Home Estates*[1] advises park owners on fulfilling the industry's commitment to environmental protection. *Holiday Parks: Caring for the Environment – a guide to good practice* (1991), published by the Countryside Commission, remains an important reference document that includes many case studies directing holiday park operators toward best practice. Planners should work with owners and developers of sites to ensure that the most is made of these opportunities. Where there is an identified demand for new or expanded sites, planners should ensure that environmental impacts and impacts on visual amenity are minimised.

22. New sites that are close to existing settlements and other services will generally be more sustainable as some local services may be accessed by means other than by car. Similarly caravan storage facilities that are close to existing settlements may have less adverse impact and be more sustainable. However, there may be valid reasons for extending or improving existing holiday parks that are not be located close to existing settlements by virtue of their support for successful local businesses and the provision of employment. Authorities should also consider how the proposal will affect tourism in the area, particularly in terms of its economic and environmental impacts.

23. Local planning authorities may attach conditions to planning permissions for holiday parks to ensure that they are used for holiday purposes only. However, with better caravan standards and the trend towards tourism as a year round activity, authorities should give sympathetic consideration to applications to extend the opening period allowed under existing permissions. Annex B covers these matters in more detail.

[1] Park home estates are outside the scope of this guide as they are residential and not tourist developments

STAFF ACCOMMODATION

24. For many types of holiday parks, a residential managerial presence is often essential, to achieve quality service to the customer, security for the property, and to meet the obligations of health and safety regulations. Accommodation may sometimes also be needed for key members of staff. As far as possible, suitably located existing dwellings should be used to meet these accommodation needs. But where this is not a feasible option, and particularly in locations where suitable housing is not available, or is unaffordable, it may be necessary to provide new, on-site accommodation for managerial and/or other staff. In such cases the conversion of any suitable available existing buildings should be considered first in preference to the construction of new and potentially intrusive housing development in the countryside.

25. PPS7 makes it clear that isolated new houses in the countryside require special justification for planning permission to be granted. PPS7 further states that one of the few circumstances in which isolated residential development may be justified is when accommodation is required to enable agricultural, forestry and certain other full-time workers to live at, or in the immediate vicinity of their place of work. There will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in a tourism enterprise to live at, or very close to, the site of their work. Local planning authorities should give consideration to the essential needs of all businesses located in rural areas, including tourism and should apply the policies set out in PPS7 – in particular those in Annex A. Planning conditions can ensure that such accommodation is occupied for this purpose only.

Other forms of self-catering accommodation

26. PPS7 advises that local planning authorities should support the provision of other forms of self-catering holiday accommodation in rural areas where this would accord with sustainable development objectives. The re-use and conversion of existing non-residential buildings for this purpose may have added benefits, e.g. as a farm diversification scheme.

Seasonal and Holiday Occupancy Conditions

1. The nature of holidays in this country has become increasingly diverse, in location, in season and in duration. Many people go away several times a year, often for short breaks and not exclusively in the summer months. Much of this demand is for self-catering accommodation – whether in new or converted buildings or in caravan holiday homes. This spread of demand improves the use that is made of this accommodation and so is advantageous to the businesses which provide it and to those host communities which are supported by the spending that it generates. It can help to reduce the disadvantages of seasonal employment, including the difficulties of retaining trained and experienced staff.

2. Whilst extension of the season has these advantages, the demand for this accommodation may occur in areas in which the provision of permanent housing would be contrary to national or local policies which seek to restrict development, for example in order to safeguard the countryside. The planning system can reconcile these two objectives through the use of occupancy conditions designed to ensure that holiday accommodation is used for its intended purpose. Planning authorities commonly impose such conditions when granting permission for self-catering holiday accommodation. Chapter 6 above explains the general use of conditions with planning permissions.

3. One type of condition frequently used for holiday accommodation, particularly in holiday areas, is known generically as a 'holiday occupancy condition'. The aim of such conditions is generally to ensure that the premises are only used by visitors and do not become part of the local housing stock. There are three principal reasons why a planning authority might seek to do this:

    - in order that national or local policies on development of the countryside are not compromised. Often the conversion of redundant rural buildings to holiday accommodation provides a means to retain those buildings without introducing a level of activity that would occur with permanent households;
    - to avoid occupation by permanent households which would in turn put pressure upon local services. Permanent households may place demands for local schools and social and health services that would not normally arise from visitors. Moreover, in remote locations the cost of providing these services is greater. It may therefore be reasonable for the planning authority to place an occupancy condition when properties are being built or converted for residential use; and

- to strengthen tourism in a particular area by ensuring that there is a wide range of properties available to encourage visitors to come there on holiday.

Planning authorities will frame these conditions according to local circumstances, and in accordance with general Government advice that conditions should be reasonable and fair. They will also need to frame them so that they can be readily enforced by the authority but in a way that is not unduly intrusive for either owners or occupants.

Controlling use of holiday caravan and other holiday park accommodation

East Riding of Yorkshire Council established a joint working group to establish the best approach to secure holiday use of caravan parks. This group comprised councillors and council officers; representatives from the British Holiday and Homes Parks Association Ltd; the park operators and their agents; and the caravan manufacturers. It concluded that planning conditions needed to be stronger, requiring documentary evidence of occupiers maintaining a primary residency elsewhere to be provided. As a result the planning committee agreed that future planning permissions for holiday caravan parks, holiday log cabins and holiday chalets shall normally be subject to the following conditions:

(i) the caravans (or cabins/chalets) are occupied for holiday purposes only;

(ii) the caravans (or cabins/chalets) shall not be occupied as a person's sole, or main place of residence;

(iii) the owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans/log cabins/chalets on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local planning authority.

The reason for these conditions is to ensure that approved holiday accommodation is not used for unauthorised permanent residential occupation. The register required in (iii) above shall normally be collected by the caravan site licence holder or his/her nominated person.

4. Another type of condition that may be appropriate for tourist areas is known as a 'seasonal occupancy' condition. This would seek to restrict use of holiday accommodation during particular times of year, perhaps to protect the local environment. This could be used if, for example, use of the premises or the site might affect an important species of bird during its breeding season or when it is winter feeding. Local planning authorities will need to balance the need to impose seasonal occupancy conditions with the wish to avoid exacerbating the seasonal nature of tourism in the locality and its possible adverse effects upon local businesses and jobs.