

Bone Wells Associates

Economic & Planning Consultants

Great Yarmouth Borough Council

**Appropriate Land Uses in
Secondary Holiday
Accommodation Areas**

A report by

**Bone Wells Associates
39-41 North Road
London
N7 9DP**

**Tel: 020 7687 2022
Fax: 020 7687 2023**

JANUARY 2007

1	EXISTING SITUATION	1
1.1	STUDY BRIEF AND CONSULTANTS' APPROACH	1
1.2	CURRENT POSITION	1
1.3	TOURISM TRENDS	3
1.4	REGENERATION ACTION: <i>INTEGRATE</i>	5
2	THE SECONDARY HOLIDAY ACCOMMODATION AREA SURVEY	7
2.1	BACKGROUND	7
2.2	SURVEY RESPONSE	7
2.3	CONCLUSIONS	14
3	EXPERIENCE OF OTHER RESORT AREAS	15
3.1	HASTINGS	15
3.2	MORECAMBE	18
3.3	RHYL IN DENBIGHSHIRE UNITARY AUTHORITY	20
	DENBIGHSHIRE LOCAL DEVELOPMENT PLAN	22
3.4	CONCLUSIONS	22
4	POSSIBLE NEW USES IN THE AREA	25
4.1	SUITABLE TYPES OF USES	25
4.2	SURVEY OF PROFESSIONAL OFFICES	27
4.3	OTHER PLANNING ISSUES	29
5	FUTURE OF THE SECONDARY HOLIDAY ACCOMMODATION AREA	31
5.1	IS THE DECLINE IN THE SECONDARY HOLIDAY ACCOMMODATION SECTOR LEVELLING OFF?	31
5.2	THE LOCAL PROPERTY MARKET	32
6	POLICY RECOMMENDATIONS	35
6.1	BROAD STRATEGY	35
6.2	POLICIES FOR THE LOCAL DEVELOPMENT FRAMEWORK	37
	THE SECONDARY HOLIDAY ACCOMMODATION AREA	39
	APPENDICES	41

1 EXISTING SITUATION

1.1 Study Brief and Consultants' approach

The Brief for the study identified two main tasks:

- (1) an appraisal and assessment of future land use trends in the secondary holiday accommodation sector
- (2) an assessment of the role that new uses could play in regenerating the area, taking into account the inteGREAT project of physical regeneration of the seafront area, and examining the potential of such uses to actively locate in the area

These tasks aimed to provide sufficient information to meet the third objective of the study:

- (3) provide general and specific policy guidance for the future of the secondary holiday sector, updating the Local Plan policies as an input to the Council's new Local Development Framework

The Consultants approach to the study involved:

- site visits, client meeting and consultation with local tourism organisations
- desk research on the current tourism situation and recent trends
- a survey of existing property owners in the secondary accommodation area
- a survey of possible new/incoming businesses in Great Yarmouth
- interviews with estate agents
- meetings and interviews with Council officers in other local authorities who had experienced similar problems as Great Yarmouth

All these efforts yielded useful information, although the Consultants found that the amount of statistical data on current tourism activity and trends was fairly sketchy, while it proved difficult to make contact with potential new businesses despite considerable time expended on the telephone.

1.2 Current position

Study area composition and accommodation structure

The Secondary Holiday Accommodation Area (SHAA) is defined in the Local Plan to comprise a number of street frontages and blocks set back from the actual seafront (the Primary Holiday Accommodation area) as shown in Appendix 1.

The streets are scattered along a lengthy north south axis but are all close to the seafront. They could loosely be grouped into southern, central and northern sectors

with the central streets lying either side of Regent Road. It may be noted that there is very little land not built on, terraced street properties accounting for almost all the area.

The Council has recorded the planning history of the properties and carried out a photographic survey which was made available to the Consultants. This was updated as far as possible from the Consultants' site visits in June and August 2006. The street summary of names, addresses and type of use is shown in Appendix 2. From the information contained in the folders sent by the council, it was concluded – see Table 1 - that just under half the properties in the designated area (46%) were in holiday use and most of the remainder (30%) were in private use. The remainder included 2 residential/care homes and a youth hostel, 13 identified as HMOs by the council, having a strong probability of being HMO's due to their low room rates or other telling factors, and 1 property is a bank. Of the 104 holiday use properties, 11 are holiday flats and 35 are accredited guesthouses or hotels. The remaining properties' use was not clear, but some of these are probably HMOs.

Table 1 Summary of Secondary Holiday Accommodation property use

Use type	No	%
Holiday use	104	46%
- <i>Holiday flats</i>	35	15%
- <i>Accredited hotels/guest houses</i>	29	13%
Private dwellings	69	30%
- <i>Private flats</i>	12	5%
HMOs (estimated)	13	6%
Residential homes/youth hostel	3	1.5%
Non residential (bank)	1	0.5%
Unknown/boarded up	36	16%
TOTAL	226	100%

Source: GYBC, Consultants.

The analysis shows that about a third of the properties are domestic dwellings and about a half in holiday use. The structure of the tourist accommodation appears to be two thirds serviced (hotels & guest houses), and one third self-catering (holiday flats). 29 of the 69 hotels and guest houses were accredited with entries in the Greater Yarmouth 2006 guide.¹

Demographic characteristics

An analysis was made of 2001 Census neighbourhood statistics for Output Areas broadly corresponding to the SHAA (see Appendix 3). This provides an indicative picture of the study area. The analysis confirms the older and poorer make up of the

¹ Out of 70 listed in the Guide, the remainder being located outside the Secondary Holiday Accommodation Area.

locality, with less good health and with above average occupation density. None of this is particularly surprising, but it supports the policy aspiration to regenerate the area and may facilitate attraction of funding for that at some time.

1.3 Tourism trends

Visitor numbers, hotels and employment

Before surveying hotel operators the Consultants investigated tourism trends with reference to available statistical data and discussion with the regional tourism agency, the East of England Tourism Board.

The general background is one of traditional seaside resort decline, chronicled in the English Tourism Council report, 2001, "Sea Changes". That study noted that the volume of tourism trips in England had remained broadly stable over the previous 25 years, at 100 million per year, but that seaside tourism visits had fallen from 32 million to 22 million.

There are some data on visitor numbers to Great Yarmouth, estimates being available for the period 1996-2004, with a further estimate for 2003 – see Table 2. Revisions to classifications make comparison an approximate exercise, but the data provides a general picture of change over the last decade. In particular the decline in serviced accommodation demand is highlighted – a huge fall of 73% over 1996-2003 - although there may have been a modest revival if the 2003-04 changes are sustained. Caravan and self catering holidays also declined substantially – by 36% - even if this was a less steep decline. The most notable growth area was staying with friends and relatives, although this of course does little for the tourism accommodation industry. Other apparent growth areas were in niches like boat moorings.

Table 2 Estimates of staying visitor numbers, Great Yarmouth 1996-2003-2004

Accommodation used	TOTAL-2004		TOTAL-2003		Accommodation used	TOTAL-1996	
Serviced	278,100	23%	241,400	18%	Serviced	892,680	43%
Self catering	100,300	8%	91,400	7%	Self catering	166,080	8%
Touring caravans/tents	138,200	11%	236,300	18%	Touring caravan	456,720	22%
Static vans/holiday centres	438,700	36%	543,700	41%	Static vans/holiday centres	435,960	21%
Group/campus	3,300	0%	1,300	0%	Holiday Centre	332,160	16%
Paying guest	200	0%	400	0%		-	
Second home	2,200	0%	4,400	0%			
Boat moorings	9,000	1%	2,000	0%		-	
Other	28,200	2%	21,900	2%	Other	20,760	1%
Home of friend/relative	214,100	18%	188,300	14%	Home of friend/relative	103,800	5%
Total	1,211,300		1,329,100		TOTAL	2,076,000	100%

Source: Greater Yarmouth Tourism Development Agency

While visitor numbers may still be decreasing the decline is likely to have become much more gentle, and may even have stabilised. The pattern is consistent with the findings of the accommodation survey, discussed in Section 2.

The SHA in Great Yarmouth is primarily about serviced accommodation so it is important to determine as far as possible the trends in the number of hotels and guest houses in the resort. Data is only available for Great Yarmouth as a whole, rather than for the SHA, but Figure 1 shows the general decrease in establishments for the period 1991-2004 for which some time series data is available. Also plotted on Figure 1 are trends in the numbers of employees in the hotels sector, which show a similar fall. Employment fell from just over 1,000 in 1991 to about 550 in 2004 (fall of 45%) and the number of recorded hotels and guest houses from 186 to 87 over the same period, a fall of 51%.

Figure 1 Trends of hotel numbers and hotel employment in Great Yarmouth, 1991-2004



Source: GYTA, ABI. Note that information from the latter source is approximate.

While the data refer to the whole of Great Yarmouth it is unlikely that the trends for the SHAA, with about half the total amount of serviced accommodation establishments, are very different. The changes in estimated visitor trips, hotels and employment are also all broadly comparable.

Comments from the East of England Tourism Board

Discussion with the EETB confirmed that their statistical estimates were based on information on assessed accommodation, with information on the number of bedspaces provided by GYBC. In 2004 for example this was estimated at 3,099 in hotels, guest houses and 2,366 in bed & breakfast accommodation, hence a total of 5,465 serviced beds. This is not broken down by locality however. The EETB commented that there was a large turnover of establishments, changing hands, with significant construction activity in the winter months, doing repairs and refitting.

The combination of contractors' personnel, wind farm employees and, more recently, migrant workers, has provided the Great Yarmouth hotels and guest house sector with a steadier year round accommodation demand which the EETB says is very welcome.

The caravan population appears to have retained its absolute number, even if the number of tourist trips has declined. According to the EETB, the totals in 1999 and 2004 were as follows:

	1999	2004
Static vans	7,139	6,212
Touring pitches/tents	2,614	4,167
Total	9,753	10,379

It is possible that a similar phenomenon of non-tourist demand as appears to support the hotels sector has sustained the number of caravans in the Borough, although there does not seem to be any information about this.

The Tourism Board have no special strategy towards the secondary accommodation sector, nor are there now any tourism grants for upgrading. The future of the sector thus lies firmly in local hands.

1.4 Regeneration action: *InteGREAT*

A large inner area of Great Yarmouth, like its smaller cousin Lowestoft to the south, has been included in the new Urban Regeneration Company (URC) First East, announced in March 2005. However, the URC boundary does not include the holiday areas of Great Yarmouth and, while a master plan has been prepared, the URC has been too recently established to have had a major impact. Similarly, most of the European Regional Development Fund (ERDF) assistance under the Objective 2 Programme for Great Yarmouth and Waveney,² has been applied to areas outside the SHAA, with the major exception of the £16.3 million regeneration scheme *InteGREAT*, which specifically encompasses the seafront as well as town centre and heritage areas of the Borough, towards which the ERDF contributed £4.7 million.

InteGREAT, which has mostly been completed, has delivered major improvements to the physical infrastructure of the tourism areas, ranging from pier refurbishment to lighting, pedestrian street upgrading and landscaping to gardens enhancement. They have not been targeted specifically at the SHAA but the area has indirectly benefited from the substantial sprucing up of the resort townscape around it. The SHAA is thus more attractive than it was to new investment, and to its appeal as a holiday destination.

² The Local Area Framework for the Great Yarmouth and Waveney Sub-Region, 2005-2006.

2 THE SECONDARY HOLIDAY ACCOMMODATION AREA SURVEY

2.1 Background

The purpose of the survey

The purpose of the survey was to collect information about the current state of the secondary accommodation sector in Great Yarmouth, about non-holiday use, and attitudes to the introduction of new activities to the area. It therefore covered both secondary accommodation providers and landlords of premises in non-tourist use, including ordinary domestic properties. The survey also aimed to gather information to help understand the economic viability of secondary accommodation, characteristics of their markets, and factual data on their business, e.g. occupancy rates, seasonality, and trends. On the planning side views were sought on potential new land uses such as professional offices and upmarket apartments being introduced to the area, as well as needs for improvements like better parking

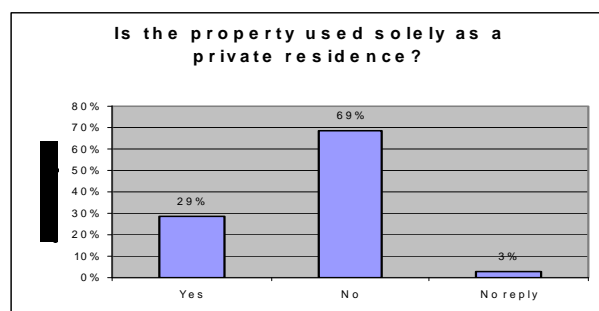
The survey universe consisted of the 227 properties in secondary accommodation areas identified by the Council (see Appendix 1). Postal questionnaires were mailed to each of the 227 properties on the 20th September 2006, addresses being taken from the archive folders loaned by GYBC. A copy of the questionnaire is provided in Appendix 4.

2.2 Survey response

35 replies were received giving a response rate of 16%. This is a typical average for this type of survey, small but enough to provide a reasonable indication of conditions.

69% of replies were received from people whose properties were mainly used for accommodation purposes (Figure 2). None were received from properties not used for domestic or accommodation use (e.g. business office, cafés etc), although there are very few of these.

Figure 2 Main use of property

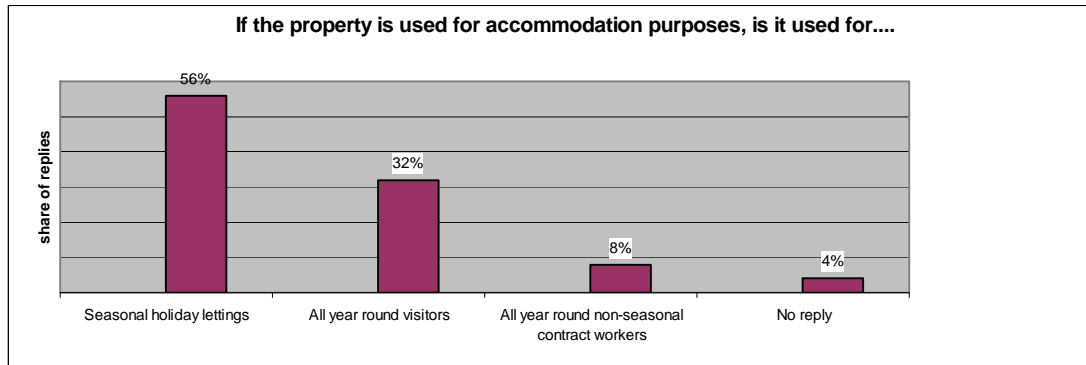


Analysis of the 69% of properties used mainly for accommodation purposes

Type of letting

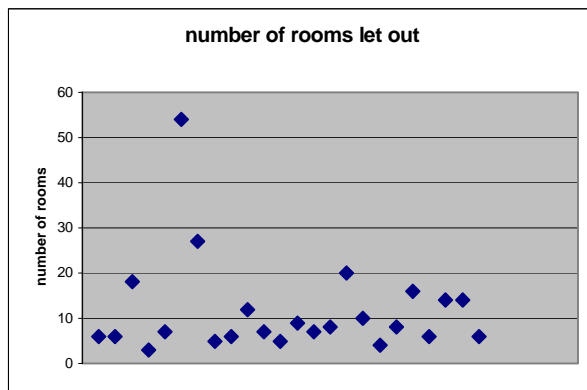
56 % of the respondents use their properties for seasonal holiday lettings, 32% for all year round non-seasonal visitors (e.g. business visitors), and 8% are used for all-year round non-seasonal contract workers, social benefit, asylum seekers (See Figure 3)

Figure 3 Property use within accommodation



All the properties have been used for accommodation purposes for over 10 years, 80% for over 20 years and 45% for over 30 years. 65% of the properties have less than 10 rooms and 91% less than 20. (See Figure 4)

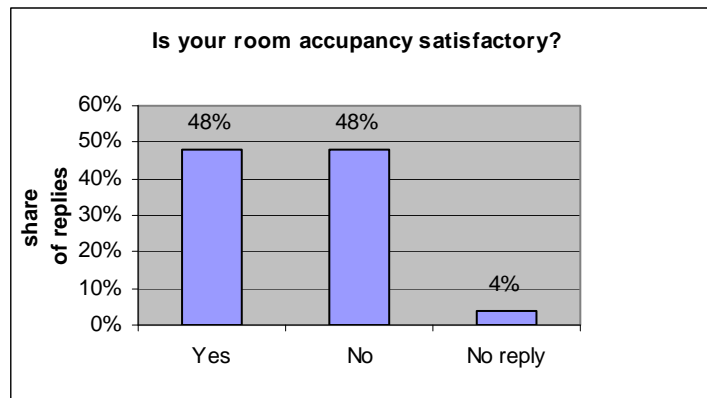
Figure 4 Number of rooms let out



Occupancy and room rates

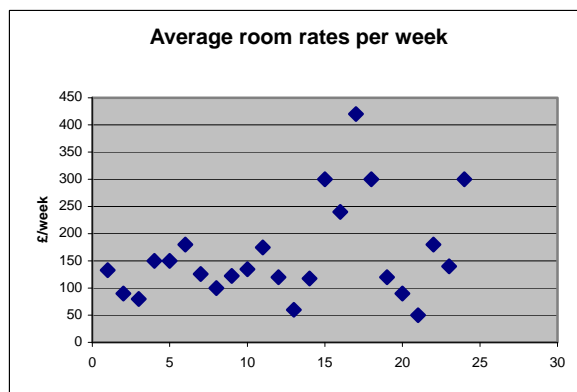
To the question " During the holiday season is your room occupancy satisfactory? " half of the property owners answered yes and half answered no (See Figure 5).

Figure 5 Room Occupancy Satisfaction



Average room rates per week were £173. 25% of the rooms have weekly rates under £100, 67% of the rooms under £150 and 20% have rates over £240. (See Figure 6)

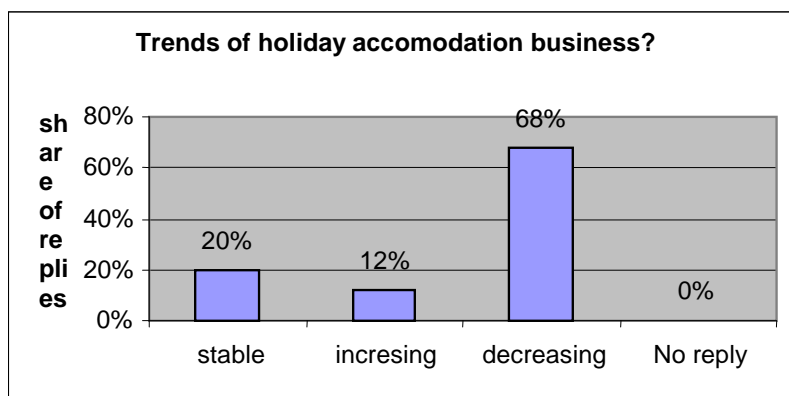
Figure 6 Average room rates week



Visitor number trends

When asked their opinion regarding the trends of the holiday accommodation business, 68% thought it was decreasing, 20% stable and 12% increasing (see Figure 7). This suggests fairly strongly, unless the response was totally unrepresentative, that the traditional secondary accommodation *hotel* sector is in decline. It does not follow of course that the overall secondary sector, dominated by caravan accommodation, is in decline.

Figure 7 Direction of visitor trends



An interesting finding brought out in Table 3 is that those hoteliers experiencing stable or an upward trend in visitor business were those having the least objection to the introduction of new land activities.

Table 3 Attitudes to introduction of new land uses by holiday trends experience

What are the trends of the holiday accommodation business?	Would you object to the introduction of new land use activities?	
	Yes	No
Decreasing	47%	53%
Stable	20%	80%
Increasing	0%	100%

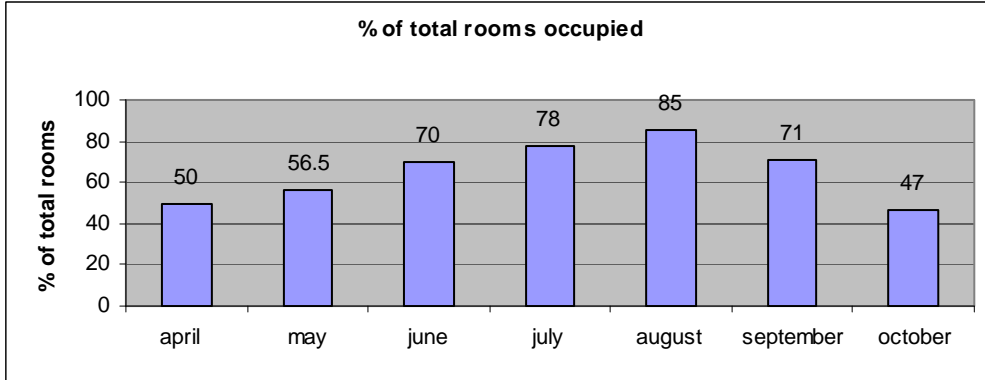
Table 4 shows opinions about the trends of the holiday accommodation business by type of owner. Interestingly, although the sample is small, the owners of seasonal holiday lettings appear to be experiencing the most buoyancy.

Table 4 Opinion on trends by type of accommodation business

Opinion on trends of the holiday accommodation business				
	Stable	Increasing	Decreasing	TOTAL
Seasonal holiday lettings	36%	14%	50%	100%
All year round non seasonal visitors (e.g. business visitors)	0%	13%	88%	100%
All year round non-seasonal contract workers, social benefit, asylum seekers	0%	0%	100%	100%

As can be seen in Figure 8 the main season is June-September (70-85% occupancy) with shoulder months April, May and October, about 50% occupancy.

Figure 8 Monthly occupancy rate

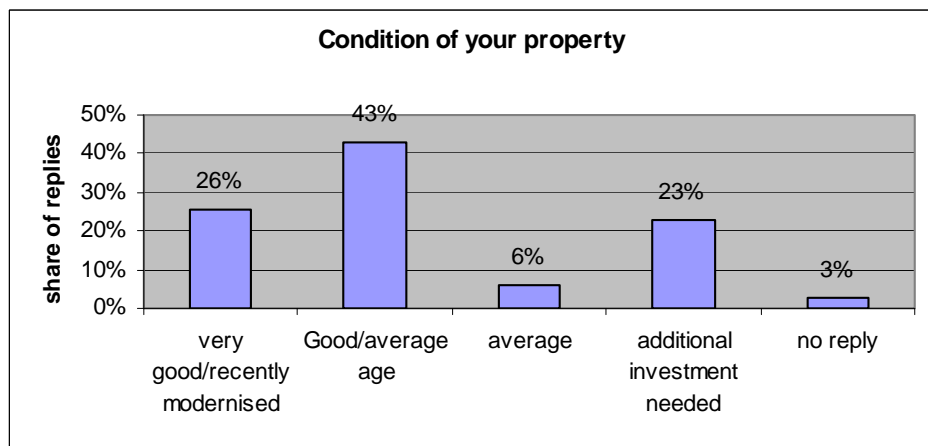


Other non holiday issues

Condition of properties

Figure 9 records responses of property owners to a question on their property's condition.

Figure 9 Condition of the property



As can be seen in Table 5, people owning properties used for accommodation purposes believe they are in better condition than owners of properties solely used for domestic purposes.

Table 5 Condition of property by domestic or holiday accommodation use

		Is your property used solely as a private residence or for accommodation purposes	
		Private	Accommodation
How would you describe the condition of your property	Very good	22%	29%
	Good	22%	50%
	Average	22%	0%
	Needs Investment	33%	21%
Total		100%	100%

Of all respondents to the questionnaire:

- 57% find their parking provision inadequate
- 60% would not object to the introduction of new land use activities in their street e.g. dentist, doctors, accountants, restaurants etc.

Tables 6 and 7 show the share of people objecting or not objecting to the introduction of new land use activities according to the type of property owned. The majority are favourable. Table 7 suggests that proportionately more of owners of private residences would object (than holiday accommodation owners) but nonetheless a majority of all owners do not object.

Table 6 Attitudes to new land uses by holiday property type

Properties used for accommodation purposes	Object	Don't object
Seasonal holiday lettings	36%	64%
All year round non seasonal visitors	50%	50%
All year round seasonal contract workers	0%	100%

Table 7 Attitudes to new land uses by broad property type

All properties	Object	Don't object
Private residence	45%	55%
Used for accommodation purposes	37%	63%

A finding of the survey was that properties that have lower room rates/week are more interested in seeing the introduction of new land activities. The median value for room rates is £133.5, half of the properties charge rates below this value and half charge rates above. Of the properties charging rates below the median, 91% would not object to new land use activities on their street. Of the properties charging rates above the median only 41% wouldn't object of new land use activities on their street. This may

suggest that the more marginal enterprises see new activities as a means of upgrading the area, and benefiting from that, while the more flourishing hoteliers and guesthouse owners

General comments

Reproduced below are comments to questions 19 and 20 of the survey.

Q19) *Are there other improvements that you would welcome in your street?*

"More CCTV and police presence to stop lager louts. More parking"
"Stop houses being developed as flats for immigrants, DSS etc without car parking. Stop unlicensed unregistered guest houses "
"Resident parking"
"Resident parking -only"
"More holiday accommodation and less social housing"
"Up the standard of building accommodation"
"Standard condition of buildings and occupants"
"Removal of rubbish"
"More parking, more traffic wardens, stop parking on double yellow lines"
"A recycling centre we don't have to drive to"
"New bin. Camera's"
"Better security-damage to vehicles is common occurrence"
"Bins for rubbish. Parking bays marked on road, which would encourage drivers to park sensibly"
"Cheap permit parking for B&B customers to stop day trippers using the few free parking spaces"
"Street could be cleaned more regularly. Rubbish bins should be kept out of site, proper control of parking space"
"More cleaning, resurfacing, police patrols, street furniture"
"General rubbish in the street gives area a negative image"

Q20) *Do you have any other comment about the holiday sector in town?*

"Emphasis is mainly in prime letting areas and not enough in secondary"
"G.Y. has turned into a stepping stone doe asylum + emigrant workers, the trouble we hear about is abhorrent, I am worried for my family safety. Streets are dirty"
"Street very run down and dirty" [xxxxx Street]
"Not enough hotel accommodation for couch tours to keep coming"
"Needs to be quickly and seriously improved"
"It is lowering its standards"
"Inadequate police presence, excessive traffic violations"
"Foreign workers do not help tourism"
"Not enough parking"
"Investment in tourism with its part time, seasonal, minimum wage employment should not in anyway be to the detriment of business previous full time skilled/semi skilled work with better pay and jobs"
"Inadequate litter provision"
"Requires more entertainment for all ages, specially out of holiday season"
"Noise pollution in the area, behaviour and noise levels at all times of night and early morning gives a negative image"
"There seems to be quite a large number of holiday-workers in the town and on the sea front even late on in the season"

2.3 Conclusions

Replies received were either from properties used as private residences (PR) or properties let for accommodation purposes (AP)

Most of the properties used for accommodation purposes have a small number of rooms and have been used for AP for over 20 years.

Over half the owners of private residences considered that their properties were in only average or below average condition

On the other hand, owners of properties used for accommodation purposes believe that their properties are in reasonable shape.

Most owners of properties used for AP believe that the holiday accommodation business is in decline

The most optimistic, though are the owners of properties used for seasonal holiday lettings.

There are plenty of comments about the need for better provision of parking and parking enforcement. There are also many comments about the need for better refuse disposal/collection methods.

3 EXPERIENCE OF OTHER RESORT AREAS

3.1 Hastings

Context

While Hastings has an attractive old town and fishing boat quarter, it has no beach or amusement area comparable to Great Yarmouth. Its pier appears run down. Buildings on the sea front, mostly Victorian, are primarily in residential use, with some retail at street level. Although the town centre appears to be busy, it is not considered to be a prime retail area, despite the recently developed Priory Meadow complex. Under two hours by train from London, house prices in the area appear to be less than half those of comparable properties in Tunbridge Wells, located inland on the same railway link.

Historically, there was a very considerable loss of secondary holiday accommodation in the 70's and 80's, as London boroughs placed their homeless families into the town, particularly into the St Leonard's area. Inspection of the Hastings internet site indicates that there are now some 2,354 HMO properties in Hastings, containing 9,900 households, and that 86% are unfit in terms of fire / amenities. Although the relocation of homeless families into the borough has now stopped, the town has not recovered from this earlier resort decline; there is now no significant bed and breakfast, or 'secondary holiday accommodation' sector to speak of.

Economic regeneration initiative

In 2003 a task force was established, comprising the Government Office for the South East, the South East Development Agency, English Partnerships and the local district councils to address the economic decline of the area. Having now secured some £60 millions of government funds, it has set up 'Sea Space', a company limited by guarantee, as a delivery agency to 'secure economic prosperity through the creation of a new urban fabric, accommodating and encouraging a vibrant resident, business and education community embracing a strong entrepreneurial culture where the economic benefits can be directed to the most deprived wards' Its regeneration programme covers education, business, urban renewal, improved transport and broadband installation. Sea Space's programme then is not to seek to regenerate Hastings as a sea side resort, but as an attractive economic centre. Given this focus, its current remit excludes the problem of housing in multiple occupation; this has been left to the Local Authority to deal with.

Housing renewal

In 2004, the Council declared central St Leonard's a 'Housing Renewal Area', with the prime aim of tackling properties in multiple occupation. Council's aim is to produce a physical housing upgrade and a better balanced social mix. However there have been a number of problems in policy application, most particularly, the expense of buying an

HMO property whose purchase price reflects a high rental value, and then converting it into much cheaper priced single or maisonette use. While acceptable for one or more properties, it is not viewed to be more generally practicable given the limited financial resources available. (While CPO powers remain an approved part of the Authority's armoury, no CPO has yet been served on an HMO.)

Hastings Council itself has very little social housing available for tenant relocation.

Therefore the Council has been very dependant on the (limited) capacity of Housing Associations to assist, and, more importantly on the application of HMO registration and planning enforcement powers to force HMO owners to make basic improvements to their properties, as set out below.

HMO registration

Presently Hastings has two schemes in operation, the first applicable across the Borough established in 2001, and the second, set up as part of the Central St Leonard's Improvement area, established in 2004.

The first scheme only applied to HMO's which were not self contained, and more importantly, were dependent on the voluntary co-operation of the landlord, either to register as an HMO or then having registered, to comply with the Council's minimum accommodation standards, to do with fire safety, space standards, food preparation and general sanitation. However, it is anticipated that the implementation of the Government's 2004 Housing Act as of April 6th 2006, requiring the licencing of all such HMO properties, and their mandatory improvement in line with Category 1 Decent Housing Standard, will effectively take over from this registration scheme.

The second HMO registration scheme has been focused on the Central St Leonard's area. By contrast with the earlier scheme, it has the legal backing of the 'Housing Renewal Area', declared in 2003. It additionally applies to HMO's which, although self contained, are in multiple occupation.

Since declaration in 2003, the authority has focused its attention on the worst HMO properties in the area. A 'carrot and stick' approach has been followed, where not only has there been the threat of legal enforcement of minimum accommodation standards and external building appearance, but there has been the provision of discretionary grant assistance. To date 15 grants have been provided and some 30 properties have been improved to acceptable HMO standards. As part of its 'carrot' approach, the local authority is also considering providing for street / area amenity improvements

Use of Section 215 of the Town and Country Planning Act by the Council

As reported to the consultants by Alan Beresford of the Enforcement section of the Council, Hastings, in June 2000, started a comprehensive strategy to target run-down and derelict buildings/land, utilising Section 215 powers. Section 215 of the Town and Country Planning Act 1990 enables LPA's to take enforcement action where they consider that the condition of a piece of land or a building is such that it is adversely affecting amenity of part of their area. The work has become a key element of the Borough's ongoing regeneration programme. It has had important implications in terms of the local economy and has proved extremely popular with local people, businesses and visitors to the town.

Since June 2000, over 150 Section 215 Notices have been served and many more warnings of potential action issued, with the result that 271 previously run down and derelict premises have been improved to the authority's satisfaction. In the instances where owners have not complied, the Authority has successfully prosecuted. To date there have been 16 successful prosecutions so far (out of 16). On six occasions Magistrates imposed a maximum £1000 fine.

There is also a continuing offence for failing to comply following the first conviction (maximum fine £100: 00 per day). On 15th April 2005 the Authority returned to Court with 3 cases resulting in fines being imposed totalling £48,300 (£16,100 each) and costs of £1,893. Magistrates also imposed a £2,500 fine regarding a failure to return a Requisition for Information Notice served on a party with an interest in one of the S215 related cases. Direct action works in default have also been undertaken on four occasions so far.

While most actions have been associated with buildings and their grounds, the Authority has also used section 215 powers to clear an old caravan park, remove demolition materials and restore sites subject to waste tipping. Of the premises improved so far, 32 were Listed Buildings and 141 were in Conservation Areas.

Application of Section 215 powers

In order to achieve the foregoing, a hardline approach, intolerant of delay, has been adopted by Hastings, which utilises the powers available to their maximum potential and utilises publicity wherever possible.

Section 215 investigations are carried out in accord with the Police and Criminal Evidence Act 1994. All staff are fully PACE trained; Prosecution files are prepared according to the Criminal Procedure and Investigation Act 1996. Most owners and/or occupiers are traced through the Land Registry, Companies House, Council Tax, and local knowledge. In those few cases where persons have not been traced the authority has resorted to using Private Investigators.

Owners and/or occupiers of eyesore land and buildings receive two warnings. Where those warnings are ignored, or the response is unsatisfactory, or works do not commence, or do not progress as promised, enforcement action is taken.

Notices must be clear, precise, unambiguous and reasonable. They should aim to achieve a quality, lasting solution. Where necessary, specialist input is sought from conservation officers, engineers etc. If a premises goes beyond the remit of a Section 215 Notice, the Authority can resort to the Building Act, Compulsory Purchase or the Listed Building legislation. The majority of Notices are served by hand to ensure secure receipt.

Remedial works are closely monitored for full compliance. If they are found to be substandard the appropriate parties are warned. In one long running case the owners were eventually fined £750:00 for a substandard job, a level of fine which took account of their guilty plea. Shortly after that, the required comprehensive package of measures was undertaken.

Hastings Local Plan 2004

While the Local Plan accepts that there is little prospect in the short term of re-use of former holiday accommodation, it does have a firm policy against any further loss of such uses. Policy T4, 'Change of use of hotels and guest houses', states, 'where an application for change of use of hotels and guest houses is made it can only be granted planning permission where:

- detailed evidence can be provided that the building is no longer viable as a visitor accommodation, and
- the proposal would result in a major upgrading of the structural condition of the building .

There is no specific 'Secondary Holiday Accommodation' policy.

3.2 Morecambe

Context

Seen by many as the former up-market version of its neighbour, Blackpool, Morecambe is thought to have suffered a 95 % loss of its holiday accommodation beds since the late 1950's. While some reduction was inevitable with changing holiday patterns, much of its decline occurred during the building of the nearby nuclear power stations, Heysham 1 and 2. At the time, this gave the opportunity for many hotels and guest houses to accommodate an influx of contract workers, providing all the year round income. However, when the contract workers left after completion of construction, these businesses, having effectively lost their holiday trade, reverted to other uses. It is roughly estimated that there are in excess of some 400 HMOs located in the town. These adaptations of former seaside accommodation are mostly concentrated in the Morecambe's town centre and West End.

Strategy for 'Winning back Morecambe's West End'

In regeneration terms, the Local Authority has moved on from an earlier 2002 DTZ Piedad report, which primarily looked to reinstating the town as a seaside resort, to that set out in BDP's 2005 / 6 Master Plan, which aims to regenerate Morecambe, not as a seaside resort, but simply as a good place to live, work and play.

The BDP report 'Winning back Morecambe's West End', discounted the idea of a company limited by guarantee as being too expensive and cumbersome. Instead, a 'Collaboration agreement' was proposed. This however has subsequently been considered to be too rigid, (particularly with respect to forward commitment of agency / service budgets), and so there now exists no more than a 'Collaborative arrangement'. In this context, contributory partners are signed up to a 'Framework for investment' in a 'Memorandum of understanding' for a nominal five year period.

Housing renewal

Included in its proposals for 'Winning back Morecambe's West End', is the acquisition of 173 properties either by CPO or by negotiation. Of these it proposes to remodel 110

of the larger, mostly HMO properties, and to demolish 63 smaller ones for open space and redevelopment. Only shorthold tenants have a right to be rehoused in rented accommodation. These and other regeneration measures would, it is hoped, help the town to regain some of its lost brand image.

While the authority is fortunate in having the support of English Partnerships involvement and contributory funding, the HMO problem is seen to be not just a physical one of refurbishment, renewal and relocation, but one requiring a cultural uplift, requiring the involvement of Education, Social Services and other welfare departments.

To date, the Council has purchased a number of HMO and poor quality properties by negotiation, in partnership with Housing Associations, in some cases using the threat of CPO. In these instances large (former holiday) accommodation has been converted into smaller sized flat units, (often laterally, across paired properties), while smaller properties have been refurbished for single family occupation.

Unfortunately acquisition (and conversion) of properties into flats or single dwelling units is very expensive, since an HMO will have a high rental, and, in consequence, a high purchase cost. Such improvement becomes even more expensive when the cost of refurbishment / conversion, (less the low resultant value of a single family property in a run down area), is added. There is also the cost of dependency support packages for HMO tenants. However the local authority believes that such action has to be undertaken in the worst cases if the image of Morecambe's West End is to change.

Registration of HMO's

The Lancaster Council has had a legally binding HMO Registration scheme in operation in Morecambe and nearby Heysham since 1998, as approved by the Secretary of State.

This has enabled the Council to impose basic standards in HMO accommodation of three or more stories with three or more households in terms of:

- safe means of escape
- minimum availability of bathrooms and kitchens
- rubbish storage
- frontage appearance
- conditions for the control of antisocial behaviour

The current scheme will be reinforced by the Government's mandatory HMO licencing scheme additionally applicable to all properties with five or more tenants in two or more households. This latter scheme however is not considered adequate to deal with the need to restructure the larger units of the former holiday accommodation, as for example hotels.

Lancaster District Local Plan 1996-2006

BDP's Master Plan, 'Winning back Morecambe's West End', has now become a 'Supplementary Planning Document' to the Local Plan, and will be incorporated in the future 'Planning Framework'.

Otherwise there would appear to be no other current Local Plan policy in support of the retention of holiday accommodation, other than Housing Policy H22. This states that the creation of an HMO (or hostel) will only be permitted where there is proven need, no significant adverse effect in terms of local amenity, and where the facility is to be developed to acceptable standards.

Other regeneration initiatives

One way the Council is currently considering to alleviate the problem, is to try and reduce low demand in Morecambe's housing market, which is perceived to encourage cheap property landlords, letting to students and housing benefit occupants. The aim then is to encourage a more balanced mix of housing in Morecambe, by cutting back on middle class new-build housing outside, as in Lancaster and villages in between. This, it is hoped, will help steer middle income families to re-colonise Morecambe.

At the same time a programme of improvements along sea front, (eg Urban Splash and the refurbishment of the Midland Hotel), is being progressed.

3.3 Rhyl in Denbighshire Unitary Authority

Context

Similar to Hastings and Morecambe, Rhyl has declined as a sea side resort, with consequent adaptation of much of its holiday accommodation into HMOs and other uses. In addition, there are problems of vacancy, dereliction and decay of physical infrastructure.

The Local Authority's present aim is not to restore Rhyl as a traditional holiday resort, but to make it a much more attractive service centre for one of the most extensive areas of holiday caravan parks in Europe, stretching from Rhyl into neighbouring Prestatyn. Fortunately, the self-catering caravan business shows no signs of decline.

However, the 'Rhyl West' part of Rhyl is at present the most deprived ward in Wales, containing, it is currently estimated, the great majority of Denbighshire's 400 + HMO's.. As such, it currently benefits from Objective 1 European funding.

'Going Forward Strategy'

The local authority's 'Going forward strategy', established in 2002, sets out a development programme to 2015, covering physical improvement, housing, employment, education and exclusion. Among its planned physical improvements are those of the promenade and harbour, to date taking up some £3.8 of the allocated £5.3 million Objective 1 funding.

There is no formalized delivery vehicle for the strategy. However, on the housing side, the local authority, the former WDA and other participating agencies have signed up to a 'Rhyl Pact', with the former WDA, now part of the Welsh assembly, taking the lead role on the implementation of CPO purchases.

Housing renewal

With respect to housing in Rhyl West, the problem is seen to be as much social as physical. While support of former Welsh Development Agency, now part of the Welsh Assembly, has been invaluable in pumping money into a CPO programme and the redevelopment of worst areas of housing fabric, the process needs to be complemented by very substantial social support from education, life long learning, health, employment, business development and other agencies. There is seen to be an urgent need to change a culture, requiring substantial public consultation to get local people on board and take ownership.

This aside, the CPO part of the programme for Rhyl West was initiated with a Council resolution setting out an 'agreed scheme'. This proposed that a block of eleven properties be purchased for demolition. However, only eight are now being processed in the agreed strategy, since a 'hotel' property, under pressure of CPO, converted its use into flats (currently valued at £1 million), thus making it too expensive for CPO. It was also anticipated that the planning inspector would not have accepted a CPO, given the building's improved condition.

The agreed scheme for the acquisition of 11 properties was originally estimated to cost £1.5 million, but is now likely to cost £2.5 million for only 8 properties. It is probable that expectations of purchase and improvement, and the continuing demand for hostel accommodation have driven up the market. For example, a property in Rhyl which in 2000 was valued at £10,000, rose in 2005 to £200,000. In addition to these acquisition costs are all the ancillary costs of disturbance, new premises subsidy, or new housing accommodation, as well as the council's administrative costs falling on housing, social services and other public services.

HMO registration

A discretionary registration scheme has been in place for some three or four years. To date only some 60 HMO landlords, mostly in the better part of (East) Rhyl, have complied. However, these have responsibly improved their properties to the Council's minimum standards, based on the Welsh Quality Housing scheme.

The Government's current mandatory licencing scheme will, it is anticipated, radically bring into line those HMO's, mostly in West Rhyl, which to date have ignored

registration. In preparing for the implementation of the scheme, the local authority has invited HMO landlords to a number of seminars, separately addressed by fire brigade, police, building regulation, housing and planning officers. Coincidentally a number of landlords appear to have departed, and three former HMO properties have been destroyed by fire.

Planning enforcement

Similar to the planning enforcement action being undertaken by Hastings district authority, Denbighshire has actively pursued those landlords who have allowed their properties to fall into such disrepair as to adversely affect the amenity of the area.

Denbighshire Local Development Plan

The Denbighshire Local Development Plan, under Policy TSM 8 'Safeguarding existing serviced accommodation', sets out a strong development control policy against any change of use of (secondary) holiday accommodation. The latter may only be considered where planning history of premises make it unreasonable to do otherwise:

- size or situation of the premises make it difficult or uneconomic to upgrade
- the business has failed; marketing has been attempted and failed; no investment feasible
- the property outside of a 'key cluster' of holiday accommodation uses

On the face of it, this policy to be supplemented by 'Rhyl West', appears to be preventing further unauthorized loss of traditional holiday accommodation. No distinction is made between 'secondary' and 'primary' holiday accommodation.

3.4 Conclusions

While the foregoing resort towns provide useful illustrations of alternative regeneration approaches, they do not provide any directly comparable contexts, especially with regard to the introduction of new uses in secondary holiday accommodation areas. To some extent this is unsurprising since Great Yarmouth is a major resort, second only to Blackpool, with an extensive, vibrant holiday frontage, and retaining a significant holiday accommodation sector within the town. (Blackpool, it may be noted, does not appear to have any policy requirement to augment land uses in holiday accommodation areas).

However, while the other resorts examined may not appear to be comparable in the level of regeneration funding they currently enjoy, they nevertheless illustrate valuable lessons for Great Yarmouth, most particularly with respect to HMOs. In this area Hastings serves as the most useful example, particularly as the HMO 'problem' is far larger there than that in Great Yarmouth. Specifically, the steps taken there which could be adopted in Great Yarmouth are:

- registration of HMOs, (now a statutory requirement under the 2004 Housing Act), leading to the enforcement of minimum accommodation standards;
- serving of notices on HMOs where they adversely affect the amenity of an area, using S215 powers in the &CP Act 1990; and in both areas,

- taking a hardline approach on enforcement, brooking no delay and leading to heavy fines on failure to comply

While other resorts, with their greater funds available, have, with or without the application of CPO powers, purchased 'recalcitrant' HMOs, their general experience illustrates the very heavy costs involved, even with the back-up of a housing association.³

³ It is noted that the HMOs legislation under the 2004 Housing Act is only applicable to buildings of at least three storeys. Other qualifications obviously apply.

4 POSSIBLE NEW USES IN THE AREA

4.1 Suitable types of uses

The SHAA is almost entirely residential, counting serviced accommodation and uses such as care homes, set out as a grid comprising terraced two and three storey late Victorian and Edwardian housing. The streets have a coherent architectural style, in places quite imposing, lined in many places with large trees (see Figures 10, 11 and 12). The terraces have few breaks in them and the absence of off-street parking is emphasised by the extensive on-street parking.

Figure 10 Nelson Road South



The streets are also, as readily appreciated from Appendix 1, close to both the seafront on one side and town centre on the other. The main implications from this location and building pattern are:

- high accessibility and location provides inherent attraction to residential and residential-serving uses
- lack of open/unused and even underused sites significantly constrains new build and inhibits parking expansion
- main opportunities likely to involve adaptation of existing buildings

Figure 11 Apsley Road



Figure 12 Camperdown



The study brief explicitly mentions high quality apartments as a new use for the area, but not as the only ones to be considered. These could be any of a number of service

activities including 'innovative' land uses. The types of activity which suit the criteria are nevertheless limited. For example, although a high quality restaurant might blend in with the hotel-residential area it would probably require a site for new build, which would be difficult. The same is likely to apply to sports use like gyms. Retail, which attracts many customers and cars is also less suitable. The exception to this may be in one or two sites at the periphery of the SHAAs where there are opportunities to redevelop larger spaces for such uses and provide appropriate parking, e.g. gyms above shops (and possibly high quality apartments) with integrated parking.

Those uses considered to be most suitable, in addition to upmarket apartments include those suggested by the council, e.g:

- dentists' and doctors' surgeries, if there is a site opportunity or adaptable building
- other specialist health professionals, e.g. osteopath, acupuncturist
- small professional offices, e.g. solicitors, accountants, surveyors etc

But there should also be scope for new kinds of activity like:

- language schools
- student accommodation related to language schools
- accommodation for the conference market, which could be promoted in the larger hotels, or possibly in the new seafront development project
- nurseries and toddler groups activities, which can be accommodated in fairly small areas

All these would be compatible with the existing residential uses and would increase the variety and appeal of the area. However, for doctors' surgeries the trend has for some time been away from small practices so there might be limited opportunity – unless there was a new build possibility.

This leaves the main non-residential possibilities as other professional offices, whether specialist health or legal, financial and other miscellaneous uses. Most B1a category activities are likely to fit. So to investigate the opportunities further the Consultants attempted to contact a sample of such offices to seek their views, and possible interest.

4.2 Survey of professional offices

Telephone interviews were held with a number of professional businesses based in Great Yarmouth to ascertain their interest in locating in the SHAA and, more generally, their views on the area. Although it was hoped to include interviews with a variety of units including surgeries and dentists, this proved impossible and the four discussions finally made were with three accountants and one legal firm. A summary of the notes of the interviews is provided in Appendix 5.

The views of those contacted were broadly positive – in one or two cases extremely so. One of the accountants said he was personally interested in moving to the area, so long as the right property became available and, most important, adequate parking could be provided. To quote:

"[The GYBC] proposal is a marvellous idea. When looking for office space, what is available is very limited & very town centre oriented. Not very good for them as parking is a nightmare,

their business involves people carrying heavy boxes of documents and parking needs to be close to office. Worse now in the town centre since it has been pedestrianised.

S&R could do with bigger offices. Would actively consider the secondary accommodation area, possibly in a years time.”

The same respondent felt that there were no problems of [professional offices] being located next to residential property or hotel/guest house use. While the premises could be either rented or bought.

Another accountancy firm concurred with the suitability of the area for accommodating professional use, also noting the need for the housing stock to be upgraded to encourage professional residents. But this firm, like the first, said it was important for the Council to formalise its policy to encourage it and give it maximum publicity:

“It only takes one to start the ball rolling”

A contrary view on suitability was put forwarded by the respondent from one of the other accountancy firms, who thought that young families would be deterred from living in the area at the present time:

“due to the kind of people hanging about all day...”

Another problem cited by the legal firm [with respect to professional relocation into the area] was the cost of conversion of buildings, particularly health and safety and disabled access regulations. A specific example was conversion that required lift access for disabled people. If this was mandatory the conversion would not be economic.

Some of the respondents pointed to sites in the area with the potential to be redeveloped for new use. These included the Art College which “had been left empty, despite attempts to get planning permission” and “the derelict hotel in Sandown, which could be knocked down and rebuilt as appropriate office space with parking”.

It is concluded from these discussions that there are genuine opportunities for professional firms of the type interviewed based on the provisos that:

- There is a positive, explicit local authority policy to encourage such use;
- The policy is accompanied by provision of adequate parking provision for those business’s operation, specifically that it is better than available in the town centre;
- Inward investors/occupiers are not saddled with onerous regulatory requirements such as installing lifts.

Additionally, while building conversion would be the main means of introducing new uses into the area, thought should be given to some redevelopment sites on the SSHA periphery which could accommodate uses needing larger floor areas and parking, including doctors surgeries and, selectively, retail.

4.3 Other planning issues

It is germane to consider general planning issues with respect to new uses for the SHAA. One qualification concerning their introduction into the SHAA is the argument that a priority for their location is in the town centre and TC fringe areas which have already received public investment for upgrading and now desperately need new activities to bring these areas into more productive use. Thus many of the attractive old lanes located between the river and the main commercial areas have vacant and underused premises which at present leave a depressing impression of decline.

Clearly the case for introducing new activities into the SHAAs needs to be balanced with this [town centre] need. However, as the Consultants' inquiries have indicated, poor car parking provision in the town centre makes this an unattractive location for professional offices while uses like surgeries need comparatively large sites and would not readily be fitted into the town centre. Hence the conflict may be a lesser problem than may initially be thought.

5 FUTURE OF THE SECONDARY HOLIDAY ACCOMMODATION AREA

5.1 Is the decline in the secondary holiday accommodation sector levelling off?

A view needs to be taken about potential change in the secondary holiday accommodation sector and its physical setting. If it is considered likely that it will shrink greatly, that has obvious ramifications on planning policy in terms of the extent of the area defined as the SHAA, on policy towards change of use, etc.

The Consultants believe that the position is not clearcut. Taking first the hotel and guest house survey, while caution is necessary on interpretation in view of the small sample, 50% of respondents said the holiday business was declining, as opposed to only 18% stating that it was increasing. The fact that even more of the non-holiday accommodation owners said that that business was declining may indicate that there is no rescue from this source, although the sample was too small to put much reliance on it.

The trends are consistent with the steady decline of accommodation establishments, and employment, although this may be 'plateauing out' It is arguable that a diversification strategy providing more Broads tourism and other alternatives could sustain a somewhat smaller but still significant SHAA.

The reasons for the decline in tourism for resorts like Great Yarmouth are well documented and has been summarised by consultants Locum, who reported:⁴

"They are finding it difficult to adapt to changing circumstances. They have been on the wrong side of a number of market trends:

The long-term decline in the number of long holidays taken in the UK as people go abroad instead;

The rise of ABC1 socio-economic groups and decline in C2DE socio-economic groups, the primary market of the resorts;

The switch from serviced accommodation to self-catering as the accommodation of choice for holidays."

Discussion with the Tourism Development Agency broadly confirmed this assessment – it being noted that a lot of hotels were still up for sale.⁵ Also, only a limited number of establishments could cope with coaches. However, it was accepted that the business acumen of many hotel owners was variable, some being too ready to discount prices to the coach operators.

⁴ East of England Tourism Evaluation Report, Locum Destination Consulting, 2003.

⁵ The regeneration project SHARP, managed through GYBC housing department, has provided some public funding to improve infrastructure and properties including some boarded up for several years.

However, notwithstanding all this, the Consultants believe that this “model of decline” articulated by Locum and others may be outdated. There are now plentiful examples of revival in traditional seaside towns, such as the surfing led boom in Newquay, growth of language schools in Bournemouth, the influx of young house buyers in Margate and Hastings, and the increased fashionability of taking UK seaside holidays as demonstrated in North Norfolk and the West Country.

Seaside living has itself become fashionable, shared with a general interest in living near water, and Great Yarmouth has the kind of architecturally distinctive housing that appeals throughout the country to professional house purchasers. The fact that it has not yet become a local phenomenon – and there are reasons for this - does not mean that it could not take off as it has elsewhere.

5.2 The local property market

The Consultants pursued the issue from another angle, asking local estate agents about local property trends in the secondary holiday area. Telephone discussions were held with a sample of four agents (see Appendix 6), inquiring about:

- Interest from developers in new investment, e.g. flats for professional people
- The nature of current buying and selling
- Current market prices
- Problems and issues relating to conversion etc

The agents questioned indicated that there was limited conversion activity going on. The problems appeared mainly to be a combination of limited demand, low market prices, and poor image.

The limited demand was put down to a small local population of professional people, as well as absence of student population. The low market prices related to a selling price for two bedroom flats in the £70-80,000 area (compared to nearer £120,000 on Marine Parade). This was not very attractive when the same young buyers could find a two bedroom cottage for around £80,000 just outside town with none of the perceived problems of the area.

One agent stated that there was a problem with parking and vandalism, which put off young professionals who “generally run nice cars”. Another said that “local perception of the area was not a good one”.

As against the majority believing the market for conversions to be very quiet, one agent said that there had been a slight increase in developers from outside the area, interested in conversions, although this was a very recent trend.

Turning to the holiday accommodation market, agents commented that the economics of renting and conversion favoured change of use to HMOs (instead of more upmarket flats). This was encouraged by the permissions, or licences, given to turn properties into HMOs, whereas obtaining planning permission to get change of use from a guesthouse to converted flats was said to be difficult. Otherwise, there was still a market for guest houses, changing hands but remaining as guest houses. This market it was claimed, was fed mainly by outsiders, it being locals who were more disposed to turn properties into HMOs.

The agents views confirm that there are market constraints on new investment, but these need to be seen in the context of existing planning policies, which do not explicitly encourage change.

6 POLICY RECOMMENDATIONS

6.1 Broad strategy

Market trends & demand

(1) The existing holiday accommodation sector

The decline of traditional British resort areas and their serviced accommodation has been well documented, shown graphically for Great Yarmouth by the fall in numbers of establishments and employment described in this study. The historical trend of a decline in secondary holiday accommodation is matched by evidence of other seaside towns, The loss has variously been filled by conversion into various forms of residential, including, not quantified, HMOs.

However, statistically it appears that the decline in the traditional accommodation sector has slowed down considerably, and the market should not be written off. It is understood that the remaining guest house businesses are heavily dependent on the blue rinse coach market, and it should be noted that this age group is growing, and could continue to appreciate the Great Yarmouth offer as against the inconvenience of air travel, too much sun, crowds, tummy bugs and expense of the Costas. Equally, while this group is no doubt happy to have trips laid on to NT properties or the like, they are unlikely to be at home in one of the new 'center parcs' or other theme parks.

This leads in the case of Great Yarmouth for the potential for possible trend reversal, but dependent on the quality of accommodation, marketing, pricing, etc. Nor does the 'offer' itself all have to be family fun, or chips with everything, as other quite successful English and continental seascides demonstrate. The major redevelopment project being planned on the seafront, with or without casino, is another pointer to a possible recovery in tourism in Great Yarmouth. In the short term there may be some further decline in the secondary hotel accommodation stock but the Consultants suggest that this could level off.

Agents report that the guesthouse market is still active with the main interest from investors from outside the area.

(2) New non-residential uses

There has been no evidence of non-residential use developing in the SHAA, in contrast to the aspiration underlying the Brief. However, the small survey conducted suggests that this may be latent, with the possibility that a breakthrough from one or two uses could stimulate a much stronger ongoing development. Much may depend on a strong lead (and publicity) from the local authority, accompanied by supportive planning policies. Professional offices appear to be the most promising use so long as conversion costs are not excessive.

(3) New residential uses

To date there has been little evidence of new residential uses being introduced into the SSHA, but this could be changing. Somewhat like non-residential use, a clear policy stance in favour of apartment conversions combined with resistance to HMO conversions, would enhance the prospect.

Need for more positive policies

There are several strands to this. First, even without changes to the existing Local Plan policies, the Council and Tourism Authority do not seem to be using the existing policies to promote regeneration ideas to create more accommodation demand for SHAAs. For instance:

- The Local Plan could be well disposed to attracting language schools and conference 'deals / packages'. In the former case, a language school could be accommodated within a relatively cheap SHA building, with the benefit of creating a demand for various types of accommodation in the locality, and in the latter case, if it is not already happening, one or two of the bigger hotels could work towards developing the conference market, using the guest houses as occasional overflow.
- Efforts could be made to establish some kind of college linked to the University of East Anglia. In this context, the new halls / teaching areas could provide attractive out of term conference facilities, while the existing SHA building stock could provide student accommodation, with the benefit of bringing income into the holiday business area and providing additional holiday / conference accommodation for use out of term time.

Second, there needs to be a twin track policy approach: gearing up efforts to find new uses and inward residential investment while dealing independently with the HMO problem.

Finding new uses

(a) attraction of new types of activity

This will be difficult because of a limited number of suitable activities and the problems of parking and building adaptation. There are however some possibilities: in the existing main SHA streets to attract professional offices and for other uses (like nurseries and toddler groups and possibly doctors' surgeries) to use possible sites in the south and/or demolish some buildings in the less core SHA streets. For many miscellaneous service uses there is probably a higher priority for them to go to the town centre/edge of town centre to take up vacant premises.

(b) attraction of upmarket residential

This probably has a lot more potential than (a), and is maybe just waiting to happen, with suitable encouragement.

Dealing with the HMO problem

On this front, the main opportunities are:

- (a) making a better fist of the HMO sector, which after all is catering for a need, and is bringing some income into the economy;
- (b) upgrading the physical character of the HSAs, while applying higher HMO standards, to encourage investment towards the production of better quality flats / domestic accommodation in non guest house fabric, which additionally helps remaining guest house businesses. This policy accepts that there will be some displacement towards a more middle class range of incomes;
- (c) the possible introduction, subject to parking and environmental constraints, of those services, such as surgeries or toddler groups which are essentially residential focused.

6.2 Policies for the Local Development Framework

Local Development Framework recommendations

As indicated above, the consultants feel that the existing Local Plan text is much too negative. The following changes are suggested to the present text.

“ 5.2 STRATEGY

5.2.2 Add new subsection (i) to existing objectives (a)-(h) to read:

(i) encourage conversion/renewal of properties in the defined Secondary Holiday Accommodation areas to new uses like professional offices and quality apartments where such changes do not lead to unreasonable loss of existing hotel and guesthouse accommodation.

5.3 CONSERVATION OF TOURIST RESOURCES Change title to read 'DEVELOPMENT OF TOURIST RESOURCES'

5.3.1 Change the tone of the reference to 'traditional seaside'..... While noting that there has been a decline in traditional seaside, etc., note that in the last few years or so, there has been a substantial change in people's perception of UK seaside, right across the board... (think of boating, surfing, etc)... and an increasing trend for people to want to be, in one way or another, near the sea and water. And this includes the older 'traditional' sea side resort, where an increasing amount of the older building stock has been converted / improved for various forms of residential use. Also use this section to evaluate how GY tourism could take advantage of national trends / growing markets, as possibly indicated above.

5.3.3 Omit this paragraph and Policy TR4, to be amended / relocated in 5.5...

5.5 HOLIDAY ACCOMMODATION PROVISION

5.5.2 *Revise more positively; dubious that 'outdated forms' is the right phrasing. There are plenty of very successful guest houses and bed and breakfasts in Bath and elsewhere which essentially are no different in form to the seaside b & b, given 'en suite' type modernisation. It is not the form so much as the market, and, given the asset value of GY's building stock, it is the market that should be reviewed and developed. In the meantime, as per Hastings Local Plan, while noting that there has been some decline in the demand for the more traditional holiday accommodation, the Framework should say that... 'to maintain and enhance its visitor appeal, and to take advantage of potential changes in the demand for traditional seaside accommodation, it is important to safeguard hotels and guest houses'*

Omit reference 'further rationalisation is inevitable'... it does not need to be, and omit rest of paragraph which only sets up a planning inquiry debate.

5.5.3 *Policy TR11 Suggest strengthen taking into account new 5.2 STRATEGY objective (i)*

5.5.4 *Assuming the distinction between primary and secondary is kept, this paragraph should set the context, while making reference to the following (non land use) policy initiatives...*

"Those hotels and guest houses located in 'Secondary Holiday Accommodation areas' adjacent to the prime sea front areas have an important function in complementing the range of sea side accommodation. However, unfortunately the defined Secondary Holiday Accommodation areas have suffered from a number of problems in recent years, reflected, in a number of instances, in the use and condition of the built fabric.

In those instances where the maintenance of a property has been critically neglected and, as a result, detracts from the amenity of the area, the Local Authority, will seek to persuade the owners to make the necessary restorative works, which will include, if necessary, the application of its powers under Section 215 of the Town and Country Planning Act 1990.

In parallel with the above, the Council is concerned at the emergence in recent years of the number of former guest houses and other properties in the Secondary Housing Accommodation areas given over to poor quality multiple occupation. While the Council recognizes that premises in multiple occupation fulfill a legitimate accommodation need, it will, as a borough wide policy, seek to ensure that all such properties are registered and comply with nationally required standards, as set out in the 2004 Housing Act.

While the Council is concerned not to see any further loss of holiday accommodation in these areas to other uses, it welcomes, on the other hand, any appropriate investment which secures qualitative improvement of an SHA area, without prejudicing its continuing secondary holiday accommodation function."

Create new 5.5.5 POLICY TR12. "Any application of change of use of a guest house, hotel or bed and breakfast accommodation will only be considered where:

- a) detailed evidence can be provided that the building is no longer viable for visitor accommodation*
- b) the proposal would result in a major upgrading of its structural condition and the amenity of the area*

New 5.5.6 POLICY TR 13)..... This will read as the same as for existing TR 13

New 5.5.7 POLICY TR 14)..... “Subject to other policies in the Framework, the Council may consider other change of use proposals, that is other than those identified in Policy TR 13, which:

- a) may be seen as a functional service of benefit to the area, as for example a play group, professional office or doctor’s surgery, or*
- b) may be seen as positively complementing the holiday accommodation function of the area, as for example, a foreign language school,*

all provided that:

A) as existing

B) as existing

D) as existing “

The Secondary Holiday Accommodation Area

Although it was not part of the Consultant’s remit to appraise the composition of the SHAA, the Council may wish to review this in future, in the context of potential new policies for the area. An informal discussion was held with the Tourism Authority manager to establish whether any streets were particularly important to maintain as SHAAs or conversely had undergone a change in status.

The defined area appears, generally to be a good representation of the SHAA. Streets that should be maintained in this way include Princes Road, Apsley Road, Wellesley Road, Euston Road, Albermarle Road, and part of Nelson Road. Trafalgar Road was thought less critical and Paget Road has probably been lost from the SHAA.

Hence the defined SHAA seems, more or less, to be fit for purpose. It may be more important to consider whether a broader regeneration area, including defined SHAA streets, might be considered if new uses are to be encouraged, including development sites. These are likely to be around the periphery of the defined SHAA, as this is a tight group of terraces with barely a development site available.

APPENDICES

- 1 The Secondary Holiday Accommodation area
- 2 List of accommodation
- 3 Socio-demographic characteristics
- 4 Accommodation survey questionnaire
- 5 Professional businesses survey
- 6 Estate agents discussions