Tourism and Visitor Accommodation Study
ESPH658

Image 1 – De La Warr Pavilion – Bexhill on Sea

Final Report
July 2026

Contents

IMAGES

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1. Executive Summary

1.1. This Report was commissioned by Rother District Council to inform the preparation of new Local Plans for both Hastings Borough Council and Rother District Council. The aim of the work is to provide an up to date view of tourist accommodation in both areas. The objectives of the study included an assessment of current supply and demand for accommodation; the potential for growth across all types; the scope for investment; and the role of the accommodation sector in the context of the wider visitor economy.

1.2. The study includes an appraisal of tourism and accommodation trends, commentary on the health of the visitor economy in the two authorities and an audit of the accommodation stock together with an analysis of its performance. The latter part of the report provides an overview of current planning policy, impacts and relevance before examining future development options. The conclusions and recommendations point the way to how tourism can continue to be an important part of the local economy and how planning policy can help that aspiration.

1.3. In the fifteen year period from 2005 to 2020 the staying visitor market in Rother increased by 22% in terms of the number of overnight trips. The figures for Hastings over the same period show a reduction in overnight trips of 16%. This however is a better performance than most other resorts in the South-East, such as Eastbourne (minus 29%) and Bournemouth (-26%). Since then, new public investment into Hastings has stimulated regeneration and attracted branded operators such as Premier Inn, which opened a second hotel in December 2025 on the site of a former council owned car-park. For Rother, the growing interest in sustainable, locally focussed and authentic outdoor experiences has and will provide growth opportunities, particularly for rurally-based accommodation.

1.4. Inbound visits to the UK have largely returned to pre-COVID-19 levels but spending is marginally below 2019 levels. The accessible tourism market continues to represent an opportunity given that 24% of all overnight trips are taken by those with an impairment, and this is likely to increase given demographic trends, not least an aging population.

1.5. The COVID-19 pandemic inflicted significant damage on the sector with a number of lockdowns over a 14-month period from March 2020 removing most of the domestic tourism market. Since late 2021, the UK's cost-of-living crisis has had a further effect, depressing real incomes and reducing discretionary spending, dampening demand for many types of tourism and hospitality services. This trend has continued with domestic overnight trips declining over 2024-25 but with related spending slightly up, suggesting that those that are travelling are not subject to the same economic constraints affecting the wider population. These trends have also combined with long-term, supply side changes in the market that has seen customers moving from serviced to non-serviced accommodation, facilitated by Airbnb and similar platforms. That said, half of UK adults stayed in a hotel in the past year, with the post-COVID hotel market still recovering, with demand set to rise by 17% to 2029.

1.6. The strategy for the wider region set out by the East Sussex, Brighton and Hove and West Sussex Local Visitor Economy Partnership (LVEP) foresees growth of all types of staying visitors in terms of both nights and spending. In Rother, staying visitors spent £108 million in 2022, helping support over 4,975 jobs in the visitor economy. In Hastings the equivalent figures were £123 million and 5,160 jobs meaning that the two administrative areas have similarly sized staying tourism economies. However overnight visitors only represent some 7.6% of visitors to Rother and 6.5% to Hastings with the rest of the volume made up by day visitors who typically spend less, and often also bring some management costs for the local authority. **The economic impact of the sector can be increased dramatically by supporting new accommodation provision through both tourism and wider economic strategies and adjusting planning policy in support.**

1.7. As the climate changes over the next two decades, there is also likely to be a change in preference away from the southern Mediterranean towards destinations closer to home, particularly for older travellers. This trend, which is already visible in the group tours market, also aligns to the objectives of the LVEP - i.e. to increase staying visits and increase related spend. This trend will encourage overseas markets, such as those from Germany and The Netherlands. **There is likely to be an opportunity for Hastings and Rother to reposition the Resorts offer over time by encouraging new accommodation formats, such as aparthotels. In addition, there will also need to be a focus on enabling change of use away from traditional Bed and Breakfast businesses to other accommodation formats or other uses for some older stock.**

1.8. Visitors come to Hastings and Rother for a range of reasons, with three quarters of visitors coming for leisure and a fifth staying in paid accommodation to see friends and relatives. The cost-of-living crisis has put pressure on the leisure market while those that visit friends and relatives are likely to have only limited effect on the accommodation sector, often using budget hotels or sharing economy properties. Typically, the catchment for visitors will be the south coast, London and the wider

South East region with niche leisure opportunities including glamping, the seniors market and groups. Only 8% of the businesses surveyed reported welcoming business visitors, such as those attending corporate meetings and events. There may be opportunities to expand these markets as the economies of both areas grow and other local non-tourism businesses create business tourism demand. **Leisure markets show opportunities for growth and business markets (corporate meetings and business events) can also be stimulated by new investment, particularly in Hastings and Bexhill, and by overall economic growth in both administrative areas.**

1.9. This report splits visitor accommodation into two separate elements – the Tourism Economy which represents the professional sector and the Sharing Economy which reflects properties largely let by residential landlords and marketed through platforms such as Airbnb.

1.10. A total of 213 businesses were recorded operating in the professional Tourism Economy across the two administrative areas, 46% being serviced and 54% non-serviced, with 77% of these being in Rother and 23% in Hastings. Hotels make up 28% of all accommodation establishments, B&Bs and guesthouses a further 32%, with self-catering at 21%. In terms of total number of rooms, 5,521 are offered in Hastings (36%) and 9,672 in Rother (64%) giving a total of 15,193 rooms across the study area. Both areas are boosted by having five holiday parks offering a total of 2,258 rooms, the majority of which are now in Hastings, further to the closure of the 500 chalet Pontins Camber Sands in late 2023.

1.11. In the Sharing Economy, 1,655 rooms are offered in Hastings and 2,958 rooms in Rother. This represents 32% and 34% of total rooms across the two administrative areas and relates to some 2,361 active units in the year prior to the study (2024-25). There are however a total of 8,242 units that are registered on the Airbnb / Vrbo platforms, with the majority not trading in the last twelve months. This is a highly dynamic sector and the units trading are likely to change weekly. Total annual revenue was £12.7m in Hastings and £36.4m in Rother, with this total supporting an average of £19,736 per trading unit with visitors staying an average of 3.2 nights achieving an average room occupancy of 54% for the owners. The total income of £49m will be supporting a range of jobs, often largely hidden, across the two administrative areas, estimates from VisitBritain suggest that over 1,000 jobs could be created from this level of tourism income.

1.12. Over the last decade the shape of the accommodation sector has changed markedly with serviced accommodation declining and non-serviced growing, enabled by the emergence of new distribution channels. The number of rooms has not grown by much over this period however, with Rother seeing a growth of 8%. **Understanding the number and type of properties, particularly short-term lets, will be facilitated by a proposed national registration scheme of accommodation to be rolled out in 2026/27.**

1.13. Planning Policy in Hastings is underpinned by the 2014 Planning Strategy, the related 2015 Development Management Plan which together, along with other documents outlined in the LDS, make up the Hastings Local Plan. It is supplemented by the Supplementary Planning Document – *Retention of Visitor Accommodation (SPD)*. The emerging Preferred Options Draft Local Plan has also been considered, via a Spring 2026 Regulation 18. Within the extant Plan, *Policy E4 Tourism and Visitors* is the primary policy as regards Visitor Accommodation, which is supported by the SPD *to ensure an adequate supply of visitor accommodation* and *to protect existing visitor accommodation where there is good prospect of the use continuing*.

1.14. The planning impacts (churn) in Hastings have been modest given that just 23 applications were brought forward relating to 15 sites in five years. Only three sites were for over 15 rooms, including the Premier Inn with 84 rooms, which when considered on an application basis, resulted in a net gain of 158 rooms over the period recognising that some successful applications have not yet been carried forward to development (See Appendix IIB).

1.15. Planning Policy in Rother is determined with reference to the 2014 Core Strategy and the 2019 Development and Site Allocations Local Plan. The emerging draft Local Plan was also considered. *Policy EC6 Tourism Activities and Facilities* is the primary policy in relation to visitor accommodation. Policy DEC2 sets out criteria for camping, caravan and lodge sites. The Draft Local Plan proposes EC05 Tourism Activities, Facilities and Accommodation and EC06 on Holiday sites both reflecting the previous Plan and EC03 which relates to town centres. Spatial polices are reflected in Neighbourhood Plans for Battle and Rye.

1.16. Planning impacts (churn) in Rother is evident via 224 applications over the last five years. Generally these have been for smaller developments than Hastings, typically single holiday lets of one to seven rooms, often in rural areas, with the majority of these being approved. Larger extensions of existing camping / lodge sites have also been determined with some refusals on the basis of designations, highways issues etc. Gains have generally outstripped losses leading to a net increase in supply, with the exception of Bexhill.

1.17. For both Hastings and Rother formal applications represent a relatively small proportion of accommodation developments, usually within the Tourism Economy. The structural shift seen in the move away from serviced accommodation towards a non-serviced offer has partly occurred outside the planning system with many B&Bs changing to a self-catering offer, as well as new Sharing Economy providers, taking advantage of new distribution channels. This is supported by the business survey which confirmed that Airbnb is now the most popular sales channel with 61% of the sample using it as the preferred booking engine.

1.18. The national policy context is relevant to this study given the Levelling up and Regeneration Act of 2023 enabled:

- the possible introduction of a new use class C5 covering short-term lets through secondary legislation;
- The possible option of a Permitted Development Right, amended under the General Permitted Development Order, allowing conversion between C3 and C5, unless an Article 4 Direction is in place;
- A statutory registration scheme with self-registration favoured and a possible administrative role for VisitEngland in its delivery from 2026/27;
- An updated NPPF, due to be published after the parliamentary summer recess;
- The potential introduction of a Visitor Levy as part of a suite of new Mayoral Authority powers, consulted on during Winter 2025-2026, to contribute towards essential visitor economy infrastructure

1.19. There is potential for both administrative areas to attract new investment into the visitor economy but currently some over-supply in the coastal resorts reduces occupancy and may make viability for new developments more challenging. Some fundamentals such as a stable population, higher overall relative rates of employment when compared with other resorts, and a good level of qualifications provide strong foundations for growth. Some poor quality stock is dragging performance down and planning policy that allows a conditional change of use is likely to remain important in certain cases. The rural offer across much of Rother has been attractive for smaller scale tourism development over the last decade and this is likely to continue, as consumers continue to seek outdoor experiences and rural accommodation formats, such as camping and glamping.

1.20. The policy context is supportive of the visitor economy and there is long term potential for growth. Recommendations relating to planning are divided into four themes:

- The first is to strengthen the foundations by considering the establishment of Tourism Focus Areas to provide a framework for the development and management of the visitor economy within highly visited areas;
- The second area for focus is to continue to build knowledge and policy relating to the STL sector in advance of the national registration scheme;
- The third is to put in place measures that will facilitate the bringing forward of new accommodation formats;
- The last planning recommendation relates to making it easier for certain accommodation businesses to change use or exit the market.

1.21. Tourism related recommendations that may be helpful include increasing collaboration across local authority boundaries, encouraging season extension through joint marketing of the resorts, boosting visitor numbers by supporting the further greening of the sector and increasing the productivity of the numerous small accommodation businesses in the two areas.

2. Introduction

2.1 This document is the Final Report relating to a project commissioned by Rother District Council in April 2025 relating to both Rother District and Hastings Borough. The aim of the work is to provide up to date evidence on tourist accommodation to support the preparation of each Council's Local Plan and to enable the Councils to react appropriately should any changes to permitted development rights (including in relation to short-term holiday lets) be introduced.

2.2 A review covering both District and Borough is appropriate given that Rother wholly surrounds Hastings, and where commuting links and economic flows are comparatively stronger than with other neighbouring authorities due to the shared Functional Economic Market Area. The study area totals 539 km^2 with Rother having an area of 509 km^2 and Hastings 30 km^2. Population of the whole area is 187,352 with Rother and Hastings having similar populations of 96,133 and 91,219 respectively. There is a total of 90,670 dwellings across both areas, an increase of 13% in the twenty year period 2001 - 2021.[1]

2.3 Both economies have significant visitor economies with a wide range of accommodation being provided, including hotels and guest houses, holiday lets, self-catering apartments, caravan and camping sites as well as large holiday parks. There has been a structural shift in the last decade away from serviced accommodation like hotels, towards non-serviced, typically self-catered. Previous reviews of accommodation in 2016 and 2018 have been used as baselines to provide context. There is a pressing need for additional housing in both administrative areas.

2.4 The objectives of the study were to assess:

a. The current supply and demand for, and future trends, in both the serviced and non-serviced accommodation sector (all types of hotel and visitor accommodation including outdoor accommodation, such as caravan and camping sites) in Rother and Hastings, including (but not limited to) consideration of:
    i. impacts of the Covid-19 pandemic, Brexit and changing visitor behaviour on the market for tourist accommodation in Rother and Hastings, including whether any changes have remained permanent

[1] ONS 2025 Population estimates for England and Wales: mid-2024 30 July 2025 & Rother and Hastings HEDNA Update DLP Planning & Edge Analytics

following Covid/ Brexit. An appropriate base year should be identified to capture this information;

ii. impacts of the growth of Online Travel Agencies on the tourist accommodation market;

iii. impacts of the growth of short-term holiday lets and sharing economy platforms such as 'Airbnb' on the tourist accommodation market, including the prevalence of 'clustering', and any impacts in terms of losses of residential accommodation and knock-on effects on housing availability and affordability, bearing in mind each area's housing need;

iv. consideration of the condition of the existing stock of serviced and non-serviced accommodation.

b. The potential for growth or reduction in demand for accommodation, by typology (e.g. larger/ smaller; boutique/ chain; touring site/ glamping, etc);
c. Whether the emergence of agritourism, including related to viticulture, is significant in terms of visitor accommodation trends for the rural economy in Rother;
d. The scope for investment in the accommodation offer in both the urban areas and the rural hinterland; and
e. The scale of any loss of tourist accommodation stock and the pressure for residential conversion
f. The role of the Hastings visitor accommodation sector relative to the wider "Rother and Hastings" tourism market.

2.5 This study will inform the preparation of respective Local Plans and policies as regards visitor accommodation; inform potential site allocations and decision making on planning applications and any change of use or Article 4 Directions; as well as guiding council interventions to support the sector including marketing and promotion, spatial considerations and contributing evidence to the areas' wider economic strategies.

2.6 Key inputs included reviewing national and local policy and strategy; auditing the supply of serviced and non-serviced visitor accommodation; surveying accommodation businesses; assessing market demand and likely market potential; reviewing planning issues and the applications funnel; and recommending strategies that provide appropriate flexibility in dealing with both short and longer-term issues.

2.7 The report has eight sections covering current UK tourism and accommodation trends; the visitor economy in Rother and Hastings; the nature and extent of visitor accommodation supply in the area; and its current performance. The document then provides an overview of current planning policy, impacts and current relevance.

Future development opportunities are covered before conclusions and recommendations are set out. A range of Appendices present extra detail, particularly quantifying the scale and nature of the supply side.

2.8 The report is supported by an Asset Audit which provides more details of the policy review, the assessment of market demand and accommodation supply together with the results of various surveys and other enquiries carried out as part of the project. An online survey of accommodation businesses in May 2025 resulted in 65 opt-in responses and a further 16 in-depth interviews were conducted with senior representatives of accommodation establishments and commercial property agents.

2.9 The last decade has seen a major structural shift in the type of accommodation that is offered to the market with a decline in the typical serviced hotel and B&B offer and a substantial rise in the self-catered offer, often facilitated by platforms such as Airbnb. Accordingly, the report distinguishes between visitor accommodation offered by the professional sector (typically with registered businesses that may employ staff or pay VAT) and visitor accommodation that is offered by properties that use sales channels, such as Airbnb (who are more likely to be operated by individuals and from domestic dwellings). The former group of professional operators is defined as the *Tourism Economy* while the latter category is defined as the *Sharing Economy*. Table 1 below shows the detail of the categories.

Table 1 – The Categorisation of Visitor Accommodation

<table>
<tr><td rowspan="11">TOURISM ECONOMY</td><td rowspan="4">Serviced</td><td>Hotel</td></tr>
<tr><td>Branded Budget Hotel</td></tr>
<tr><td>Pub / Inn</td></tr>
<tr><td>Residential Accommodation</td></tr>
<tr><td rowspan="7">Non-Serviced</td><td>Self-Catering Apartment</td></tr>
<tr><td>Self-Catering House / Cottage</td></tr>
<tr><td>Camping / Caravan Site</td></tr>
<tr><td>Glamping Site</td></tr>
<tr><td>Holiday Park / Lodges</td></tr>
<tr><td>Hostel / Bunkhouse</td></tr>
<tr><td>Other non-serviced</td></tr>
<tr><td rowspan="3">SHARING ECONOMY</td><td rowspan="3">Normally non-serviced via Airbnb / Vrbo / Booking.com</td><td>Residential Property Owners</td></tr>
<tr><td>Small STL Businesses</td></tr>
<tr><td>Larger STL Businesses</td></tr>
</table>

3. UK Tourism and Accommodation Trends

3.1. This section provides an overview of recent and current tourism trends in the United Kingdom and provides information on accommodation performance focussing on serviced and non-serviced formats.

3.2. In both Rother and Hastings, 88% of establishments are non-serviced in terms of the total number of accommodation establishments across the Tourism and Sharing Economies. Looking at just the Tourism Economy, 60% of establishments in Rother are non-serviced, while it is 31% in Hastings. In the Sharing Economy 91% are non-serviced in both areas. The picture is similar when looking at rooms, where non-serviced accommodation provides 82% of all rooms (and 95% in the Sharing Economy). This is very different to some nearby resorts, such as Eastbourne where only 29% of the room supply is provided by non-serviced accommodation. [2]

UK Tourism Trends

The Challenge and Opportunity for Domestic Tourism

3.3. The cost-of-living crisis has affected domestic tourism in the UK, with consumers becoming more cautious in their spending. As a result, many are choosing to prioritise their main overseas summer holiday, often at the expense of shorter domestic getaways.[3] People are spending less during domestic trips, often by staying fewer nights, undertaking more day trips or switching from a meal in a restaurant to snacks in a café.

3.4. The volume of domestic tourism in the UK declined from Q2 2024 to Q2 2025 for both overnights and day visits. This was likely impacted by the increased cost-of-living and weaker consumer confidence in the UK economy. Despite this, spend per overnight trip increased by 7% - but in nominal terms.[4]

3.5. A significant challenge remains from outbound international tourism, where affordable packages and better value-for-money destinations continue to lure travellers abroad. Combined with ongoing economic uncertainty, this puts pressure

[2] In Eastbourne Serviced Accommodation makes up 17% of all establishments but 71% of all rooms. The respective figures for non-serviced is 83% and 29% for number of establishments and rooms respectively.
[3] Mintel (2024) Domestic Tourism UK 2024
[4] Great Britain Tourism Survey (2025) Domestic overnight and day trips in June and Q2 2025 – figure not adjusted for inflation which was 3.4% over the stated period.

on domestic travel brands to maintain customer loyalty. Financial incentives—such as low or no-deposit booking options and monthly calendars highlighting the cheapest travel dates—help attract budget-conscious consumers.

3.6. The growing interest in sustainable and locally focused travel presents a valuable opportunity, for both Rother and Hastings. Visitors are increasingly drawn to authentic experiences and eco-conscious holidays in rural areas that support local communities and the environment. Brands are tapping into this demand through staycation packages that draw on local heritage, outdoor activities and regional cuisine. For Rother, quirky camping and glamping provision is the accommodation format that has particularly benefitted from this trend. The theme of wellness, often experienced in a natural setting, is growing in importance for many visitors. Another consumer trend is a concern about sustainability / net zero with 85% of travellers now saying that more sustainable travel is important or very important to them.[5] Hastings can potentially offer a fully sustainable offer due to its public transport provision to and around the destination, its purpose built nature as a long-standing seaside resort and the action being delivered via the current Investment Plan which sees low carbon skills training and active travel as core elements. A programme to encourage the town's hotels and visitor attractions to take further action on sustainability, using for example the VisitEngland Regenerative Tool Kit, would support progress.[6]

3.7. Domestic business overnight trips in the UK are experiencing a strong recovery in value despite lower overall trip volumes. Domestic Business tourism in 2024 accounted for approximately 6% of total domestic overnight trips in Great Britain, 5% of bednights, and 9% of spend. Business trips had the highest average spend per trip at £516 in 2024, an increase of 41% since 2023 (£366). Large towns and cities remain the most popular destinations for business, with their share of trips increasing to 46% in 2024. Booking lead times have reduced, with fewer trips being booked two or more months in advance. January 2025 data indicates an increase in business trips using serviced accommodation (hotels/guesthouses). [7,8]

[5] Booking.com (2026) Booking Holdings Sustainability Report 21 April 2026
[6] VisitBritain (2026) The Regenerative Tourism Guide accessed 24 July 2026 and available at this link
[7] VisitBritain (2025) Great Britain Tourism Survey, Domestic overnight trips 2022 to Q3 2025
[8] VisitEngland (2025) GB Tourist Annual Report 2024 Domestic overnight trips in Britain and in England

Inbound Tourism[9]

3.8. VisitBritain modelled estimates suggest that inbound visits to the UK were just (1%) below pre-COVID levels and were up 6% vs 2023. Visitor spending was up comparable to 2023 and 2019 in nominal terms, while real-terms spend remained below 2019 but above 2023.

- Visits to friends and relatives (VFR) saw record numbers of visits in 2024 whilst spend declined year on year (YoY);
- Holiday visits grew YoY whilst spend was on par, and
- Business visits were still down vs 2019 but saw moderate growth vs 2023 (with related spend above both 2019 and 2023).

3.9. European visits were just short of pre-COVID levels but saw growth vs 2023 with record spend. North America-led recovery saw both record visits and spend in 2024, whilst Rest of World saw YoY declines in visits and spend although there is much variation by market.

3.10. In 2024, inbound business visits were the source of £5.9 billion spent in Great Britain, which was 18% of all spend associated with inbound visits in that year, and 11% of all nights. In 2024, Business visits were at 78% of 2019, not yet reaching pre-COVID levels, but year on year volume growth for business visits was faster than for the leisure purposes. Despite business visits generally being shorter (4.7 nights vs. 7.4 nights among all purposes), in 2024 they were associated with 66% more spend per night compared to average inbound visits (£184 vs. £111). The value of these visits has grown over time, with spend per visit in 2024 exceeding 2019 levels by 29% (above the rate of inflation). The majority (61%) of business spend took place in London, followed by the South East (£528 million, 9% share of spend) [10]

The 'Purple Holiday Pound'

3.11. Some 24% of domestic overnight trips and 20% of tourism day visits in the UK are taken by those with an impairment and/or their travelling companions (2% for international visitors). Average spend per overnight trip is higher for this market than the norm. When considering accessibility, it is important to note that only 7% of disabled people in the UK are wheelchair users – the other 93% have a wide range of accessibility requirements, including physical, sensory and cognitive impairments. It

[9] International Passenger Survey (2024) UK Total Inbound Update (Published 26 August 2025)
[10] VisitBritain (2026) Understanding Business Visits to Great Britain

is therefore important to consider the other issues of accessibility and not just wheelchair access.[11]

3.12. Those seeking disabled-friendly accommodation or visitor attractions are found across all demographics, but this priority rises amongst those aged 55 and over. The older and affluent 'purple pound' will become increasingly influential as an ageing population looks for ways to continue lifelong holiday habits alongside managing accessibility requirements– especially as the travel-hungry 'Baby Boomer' cohort advances into an elderly life stage. According to Mintel, there are opportunities for specialist brands offering fully serviced and supported holiday accommodation.[12,13]

UK Accommodation – Current Scale

Serviced Accommodation – Hotels

3.13. Market Growth - The UK hotel market in 2024 was valued at £25.8 billion, up 4% from 2023, driven primarily by a recovery in inbound tourism. However, the volume of trips remains 9% below pre-pandemic levels due to suppressed domestic demand, economic pressures, and competition from holiday rentals such as Airbnb. While long-term market value is expected to increase by 17% by 2029, short breaks continue to be vulnerable to cost-of-living challenges, especially in the mid-market segment.

3.14. Consumer Preferences - 50% of UK adults stayed in hotels in the past year, down from 56% pre-pandemic. Hotels are seeing growing interest in apartment-style accommodations (74% interest), glamping (53%, especially among younger and affluent demographics), and all-inclusive deals (popular with families). Room facilities are the most decisive factor in booking, with strong interest in room selection, late check-out and cancellation protection.

3.15. Supply-Side Developments - Major operators like Premier Inn and Hilton are expanding their room offerings and innovating through AI, lifestyle branding and flexible accommodation formats. The new 84 room Hastings Premier Inn that opened in December 2025 is an example, creating approximately 20 FTE jobs. Hotel pipeline growth is concentrated in cities and accessible locations, but rising concerns about over-tourism are encouraging a shift towards lesser-visited regions. The Premier Inn

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[11] Accessible and inclusive tourism, Visit England – "*The list of accessibility features requirements is complex and often needs to cover a wide range of requirements. Travel groups are typically looking to meet the accessibility needs of multiple people with multiple impairments, each with very specific requirements*."
[12] Visit Britain (2026) Discover the value of the Purple Pound
[13] Mintel (2024) Hotels UK 2024

decision was based on strong and long-term demand for affordable tourist accommodation in the area and was enabled by the availability of suitable and available council-owned land in this location.

Image 2 – The new 84 Room Premier Inn, Hastings Town Centre

3.16. Marketing and Booking Channels - 64% of hotel bookings are now made online, mainly via hotel websites and third-party platforms. Direct booking strategies increasingly target younger travellers, with perks like wellness facilities and app-based engagement.

3.17. Demographic Opportunities - Older adults (65+) are a growing population segment with a strong preference for comfort and convenience. However, 44% did not take an overnight stay in the past year, indicating further potential if economic confidence and accessibility are improved.

Short Term Lets

3.18. Following the easing of COVID-19 restrictions, properties proved more resilient than most other forms of accommodation and as a result, the pandemic increased the segment's client base. The UK Short Term Lets (STL) market, particularly for domestic properties, has shown robust growth and resilience following the pandemic. STLs retained their expanded market share in 2024.

3.19. The number of domestic STL stays reached 8.3 million in 2023, with associated spending rising to £3.3 billion. Forecasts suggest growth to 9.1 million stays and £3.6 billion in spending by 2028.

3.20. 29% of all UK adults have stayed in a STL in the last three years, while 52% expressed interest in doing so in the future—indicating strong growth potential. STLs are valued for privacy, affordability and self-catering facilities, which are especially attractive during periods of high inflation. When asking potential STL guests what would encourage them to choose one property over another, ‘things to do nearby’ topped the list (70%, compared with 48% for hotel customers). Private and personalised experiences are increasingly popular and guests are seeking “curated, one-on-one experiences” like guided hikes or natural wine tastings.[14],[15]

3.21. Booking Behaviour - Airbnb remains the leading booking channel (27%), with many bookings made last-minute and cost being a significant factor in decision-making.

3.22. Demographics - Younger adults (16–44) are the primary users, but the ageing population presents a significant opportunity. Over-65s prefer rural locations but are deterred by lack of hotel-like services.

Camping and Caravanning

3.23. Consumer trends in the camping market and caravanning market in the UK highlight a preference for affordable, unique experiences, with younger generations and families leading the demand. ‘Wellness’ holidays, nature-based experiences, and premium options like glamping are gaining traction. There is also a growing interest in off-peak camping, with an emphasis on social interaction and eco-friendly accommodation. [16] [17]

3.24. Performance - The UK camping and caravanning sector faced a decline in value in 2024 due to weather and economic pressures, though interest remains high, especially among younger generations and families.

3.25. Market Growth - It is projected that the UK camping market will generate a revenue of £718m in 2025, and is estimated to grow annually at a rate of 3.64% resulting in a projected market volume of £811m by 2029, with 6.53 million users. The expected average revenue per user (ARPU) for the Camping market is £127.27. [16]

3.26. Customer preferences - Customers in the UK are increasingly seeking outdoor experiences and activities, driving demand for camping equipment and accessories.

[14] Mintel (2023) Holiday Rental Property UK 2023
[15] Mintel (2025) Hotels UK 2025
[16] Mintel (2025) UK Camping and Caravanning Market Report 2025
[17] Statista (2025)

The trend towards sustainable and eco-friendly products has also influenced consumer preferences with a growing interest in environmentally conscious camping gear. The UK's camping market has seen a rise in demand for glamping accommodation, reflecting a growing interest in luxury outdoor experiences.

UK Accommodation - Performance and Forecasts

Serviced Accommodation – Hotels

Performance

3.27. National hotel room occupancy for March 2026 was 76%, 1% higher than March 2025. Year to date occupancy for 2026 was 72%, on par with the same period for 2025. Occupancy in Southeast England was 75% for the first 3 months of 2026, 1% higher than last year.[18] This occupancy rate reflects a sample of larger corporate hotels with many in urban centres where general occupancy rates for both Rother and Hastings is more likely to be within the 55% – 65% range.

3.28. Average Daily Rates (ADR) increased by 1% in July 2025 to £191, with Revenue per Available Room (RevPAR) also increasing compared to July 2024 (+4% to £165). ADR excluding London was £113 (+3%), and RevPAR was £95 (+5%). The South East region saw a decline of 2% in both ADR and RevPAR, to £125 and £109 respectively.[19]

Trends [20]

3.29. The UK hotel market is experiencing a mixed recovery, with varying impacts on different segments.

- Inbound tourism is recovering strongly, although overall hotel stays are still below 2019 levels.
- Short breaks are under pressure due to rising costs and competition from STLs.
- The mid-market segment faces challenges as consumers gravitate towards either budget or luxury options.

3.30. Economic factors are influencing consumer behaviour and hotel demand in the UK. The cost-of-living crisis is leading to cautious spending, while the fluctuating value of the Pound against the Dollar and Euro has influenced travel patterns to and from the UK . Adjusted for inflation, the average daily rates for many hotels in England show a year-on-year decline due to weaker demand. In the long-term however, the UK hotel

[18] VisitEngland (2026) with Amadeus - England Occupancy Survey March, 2026 Results
[19] VisitEngland (2025) England Occupancy Survey Report - July 2025 Results
[20] Mintel (2025) Hotels UK 2025

market is expected to grow by 16% to 2030 (from 2025), reaching £32.7 billion, driven by evolving consumer preferences and increased operational efficiency. UK hotel supply is expected to increase, with brands like Premier Inn and Travelodge expanding their presence. The UK leads in terms of the number of hotel construction projects in Europe, with 306 projects and 43,515 rooms in the pipeline.

3.31. Consumer preferences are shifting, impacting how hotels attract and retain guests:

- 64% of guests booked their last hotel stay online, with direct bookings on hotel websites being the most common method (24%).
- Room facilities are the top factor influencing hotel choice (48%).
- There is a growing interest in apartment-style hotels (74%) and 'unique' accommodation formats.

3.32. Mintel identifies key opportunities for UK hotels to enhance their offerings, attract diverse customer segments and increase revenue, including:

- Expanding room selection and amenities in booking systems can boost guest satisfaction and revenue.
- Unique experiences, such as glamping and all-inclusive deals.
- Catering to larger groups with family suites and interconnected rooms to enhance competitiveness against STLs.

3.33. The growing over-65 demographic presents new opportunities for the hotel market. Older adults prefer budget and mid-market hotels, with only 2% opting for luxury accommodation. The White Rock Hotel in Hastings is a local example with many visitors in this age bracket. Hotels can attract this group by enhancing services and focusing on comfort and convenience.

- Hotels are increasingly leveraging technology and innovative marketing strategies to enhance guest experiences and operational efficiency:
- Brands are increasingly using AI for personalised services and operational improvements.
- Sustainability and wellness initiatives are becoming a priority.
- Loyalty programmes are being enriched to attract and retain customers, with ethical rewards gaining traction.

Short Term Lets Market

Performance

3.34. In July 2025, the supply of short-term rental properties across the UK continued to increase month on month and exceed 2024 levels. However, the volume of nights reserved remained lower than what was seen in 2024, leading to lower occupancy rates. Growth in supply was seen across all regions in July, whereas reserved nights were down year on year, with the greatest declines seen in South East England.[21]

3.35. In England, the average number of arrivals per STL property increased from 30.4 in 2023 to 31.1 in 2024. The average length of stay per property decreased from 5.0 to 4.9 days. Holiday lets are hugely popular with domestic tourists, with 93% of visitors to English properties coming from England, Scotland and Wales. In a survey of interest in rental houses in the next three years by gender, female consumers showed elevated demand for rental homes, at 37% compared with 27% for male consumers.[22, 23]

3.36. The South East has recorded an average 4% growth in short term lets (STLs) supply in July 2025 compared to July 2024, with an estimated 56,000 properties. Reserved nights decreased by 8% to 808,000 in the same period, while occupancy decreased by four percentage points to 48%. Occupancy of STLs in Rother and Hastings in the same period outperformed this norm by 5%, at 53% with an average length of stay of 3.2 days. [21]

Trends

3.37. The COVID-19 pandemic accelerated the trend towards self-catering rentals, favoured for their affordability and personal space. STL properties show the highest growth potential of any accommodation type, with rental houses leading the way. Looking forward, the affordable image and self-catering facilities of STL properties will continue to work to the sector's advantage, as consumers are affected by the cost-of-living crisis. Visitors are also increasingly interested in quieter alternatives to tourist hotspots. [24]

3.38. Usage of STL properties is currently highest among 16-44 year olds and although many over-45s are open to staying in one in future, interest remains relatively low among over-65s. However, the rising population of older adults represents an opportunity for the STL property market.

3.39. Over-65s show a strong interest in staying in rural areas and as such, are more likely to perceive the wider variety of locations, such as in the countryside or in towns, as a benefit compared to hotels. Self-catering facilities have a relatively high

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[21] VisitBritain/VisitEngland (2025) Short Term Rentals trends from Lighthouse, July 2025
[22] PASC UK (2025) The size, growth and economic importance of dedicated holiday lets in England and Wales, August 2025
[23] Mintel (2023) Holiday Rental Property UK 2025
[24] Mintel (2023) Holiday Rental Property UK 2023

appeal among over-65s, however, they are also most likely to say that a lack of services, such as a reception or housekeeping, puts them off and as such, promoting properties that offer hotel-like services will help brands to appeal to this age group. [25]

3.40. For 17% of potential STL property guests aged 65+, facilities for older/ disabled guests, such as wheelchair access, are a decisive factor, making it important for providers to have information available related to accessibility. The condition of the property and things to do nearby are important factors to this segment when choosing an STL property, but they are less excited about properties with stylish designs and luxury amenities, such as a pool or hot tub.

3.41. The expanding STL market in the UK is increasingly impacted by stricter regulations, especially in regions struggling with over-tourism and sustainability issues such as Cornwall. Brought into force by the Levelling Up and Regeneration Act (LURA) 2023, from April 2025, a Council tax premium of 100% has been applied to all second homes on the councils' databases in both Rother and Hastings with funds ring-fenced for local improvements.

Camping and Caravanning

Performance

3.42. The English holiday park and campsite sector makes a substantial contribution to the English tourism economy, generating £9.2bn in visitor expenditure, which is equivalent to £5.45bn GVA and supports 170,429 FTE jobs. Visitors to England's holiday parks and campsites stayed 82% longer and spent 8% more than the English tourism averages. A 2023 Mintel report looking at the UK camping and caravanning sector found that total volumes returned to pre-Pandemic levels in 2022. [26,27]

3.43. Following a drop in 2024, the market is forecast to grow in value for the foreseeable future, driven by modernisation, premium offerings, and a growing interest in nature and wellness tourism, with recovery in value outpacing volume growth as consumers seek affordable yet unique camping and caravanning experiences.[28]

3.44. The UK Holiday Centres and Parks Market has remained resilient, with a steady 23% participation rate from 2022, reaching over £3.70bn in 2024 despite the rise of international travel. The market presents opportunities for growth in the Holiday

[25] Mintel (2023) Holiday Rental Property UK 2023
[26] Mintel (2023) Camping and Caravanning UK
[27] UK Caravan & Camping Alliance (2024) 2024 Economic Benefit Report
[28] Mintel (2025) Camping and Caravanning UK

Centres and Parks Market size through targeting younger, affluent, and solo travellers, as well as diversifying offerings to compete with city breaks and overseas holidays.

Trends

3.45. During COVID-19 there was an initial surge in bookings at campsites due to travel restrictions, including new people taking up camping or glamping, and an increase in motorhome/caravan ownership. Since then, there has been an increase in purchase or renting of self-contained accommodation (e.g. motorhomes, caravans and lodges). Since overseas travel became possible again, operators have seen a reduction in bookings, reverting back to pre-COVID-19 levels but an increase in competition from farm-based sites and other pop-up sites that have become more permanent.

3.46. Camping and caravanning are considered highly attractive alternatives to expensive overseas travel during the ongoing cost-of-living crisis. UK consumer trends in the camping and caravanning market highlight a preference for affordable, unique experiences, with younger generations and families leading the demand. Wellness holidays, nature-based experiences, and premium options like glamping are gaining traction, despite challenges in growth. There is also a growing interest in off-peak camping, with an emphasis on social interaction and eco-friendly accommodation. [29]

3.47. The 25-34 age group is the most likely to take UK camping and caravanning holidays, with 38% of under-35s taking three or more trips. Younger demographics, especially Gen Z, show strong future interest in holiday park breaks, with a notable rise in solo and adult-only visits. There's a strong participation for premium experiences, with affluent consumers seeking quality accommodation, wellness facilities and pet-friendly services. Eco-friendly and sustainable travel options are important to consumers, particularly Gen Z.

3.48. Brands can diversify their offerings in the Holiday Centres Market to cater to solo travellers, groups of friends, and eco-conscious consumers, while also focusing and leveraging local food and drink offerings, which ranks as consumers' top activity, which is shaping the future of the Parks Market.[30]

[29] Mintel (2025) Camping and Caravanning UK
[30] Mintel (2025) UK Holiday Centres and Parks Market Report 2025

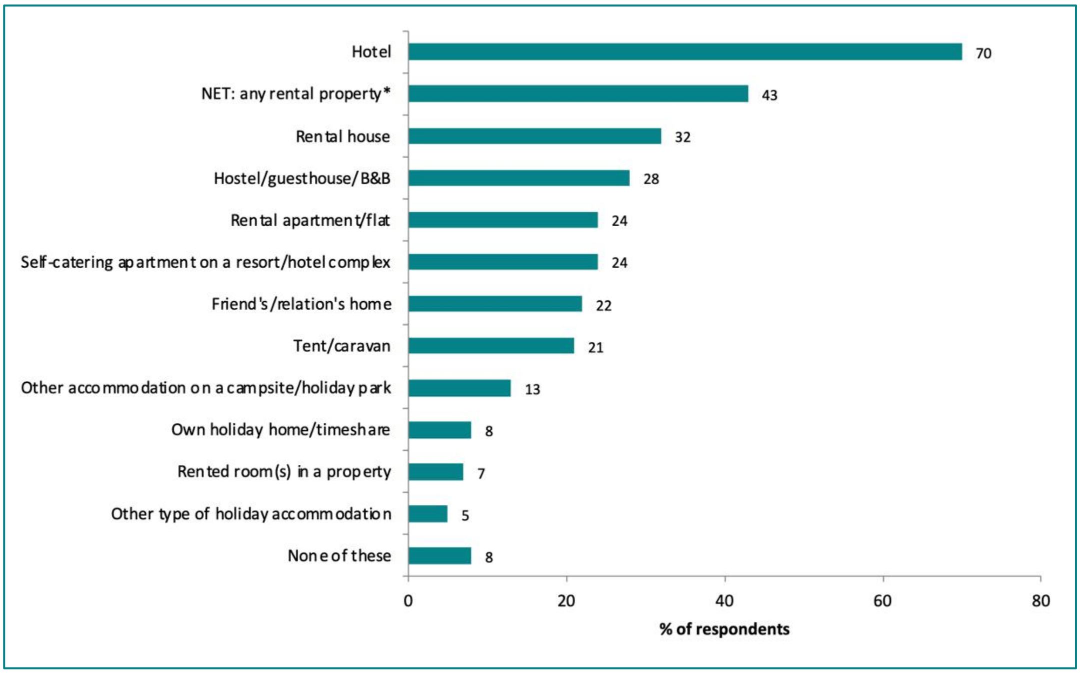
Forward Prospects

3.49. There is a generally positive forward view with growth foreseen in both the hotel market and other types of holiday accommodation.

3.50. While there has been a recent increase in hotel demand, this has been tempered by a trend towards trading down, triggered by ongoing economic concerns. Going forward, Mintel expects the value of the hotel market in the UK to reach £32.7 bn in 2030, an increase of 16% from 2025 - a growth rate of 3.2% per year.

3.51. For all other holiday accommodation, Mintel projects slightly lower levels with 11.9% growth in market value in 2025, before levelling out to steadier 3.1% growth in 2026 as the post-pandemic travel surge gives way to sustainable market development. This will see spend per night reach £516 by 2030. Figure 1 shows consumer interest in different holiday accommodation types over the next three years to 2028.

Figure 1 – UK Interest in Types of Holiday Accommodation in the next three years to 2028 [31]



Note: 'NET: any holiday rental property' is a combination of the categories 'Rental house', 'Rental apartment/flat' and 'Rented room(s) in a property' Base: 2,000 internet users aged 16+ Source: Mintel, May 2025

[31] Mintel (2025) Holiday Rental Property UK

4. The Visitor Economy in Rother and Hastings

Introduction

Domestic Visitors to East Sussex

4.1. In 2024, East Sussex received 19.4 million domestic trips. Overnight trips made up 12% of these trips, slightly higher than national (10%) and regional (9%) averages. Spend per overnight trip in the county in 2024 was £220.60; above that for the region (£202) but below the national average of £232. Spend per bed-night was £98.04 (compared to £97.57 for the region and £106.96 for England). [32]

4.2. Breaking down the numbers by average per county, East Sussex generally outperforms the South Eastern Region in terms of overnight trips, bed nights and spend, with these figures reflecting the national average. The 2024 figures show a slight lag behind the regional average despite an increase in overnight trips.

4.3. A decrease from 2022 to 2023 in domestic overnight trips, including a significant decrease in bed nights, is consistent with trends across the sector and is likely to relate to the cost-of-living crisis. This also reflects a gradual but persistent reduction in previously important core markets, notably the coaching market – where companies like Shearing's Holidays featured resorts such as Eastbourne and Hastings with coach-based holiday itineraries often enjoyed by senior citizens. This market declined further and faster as a result of COVID-19 and is unlikely to recover to previous levels, as the senior travel market has become more sophisticated and increasingly favours independent, shorter-break and higher-spend travel. As a result, while East Sussex may have lost volume within its traditional coach-tour market, the county continues to perform comparatively well in visitor spend and overnight trip value, suggesting a shift rather than a wholesale loss of the senior demographic.

4.4. Looking ahead, the visitor economy is expected to remain an important growth sector for East Sussex and the wider Hastings and Rother Functional Economic Market Area. The 2024 Housing and Economic Development Needs Assessment (HEDNA) for Rother and Hastings identifies Accommodation and Food Services as one of the strongest forecast growth sectors through to 2040, alongside wider growth in

[32] VisitBritain (2024) Great Britain Tourism Survey (GBTS). 'Tourism Day Visits' is the standard measure used by VisitEngland, although this doesn't take account of 'Leisure Day Visitors' (those spending less than 3 hours away from home but outside their usual environment, for general leisure, recreational or social purposes.). The actual number of visitors is therefore likely to be significantly higher. Data is for East Sussex as the most localised data available.

hospitality, recreation and tourism-related activities. This suggests continued potential for growth in overnight stays and visitor expenditure, particularly where investment supports higher-value accommodation, year-round tourism and linked cultural and leisure offer. Against this backdrop, East Sussex's above-average overnight trip performance and spend per trip position the county well to capture further sector growth over the coming years. [33]

International Visitors to the South East Region

4.5. There were 4.3 million international visits to the South East region in 2023, up 18% from 2022. The number of nights increased by 5% to 33.8 million and spend increased by 8% to £2.5 billion. Visits to Friends and Relatives (VFR) made up almost half of all international visits (the national average is 35%). This is significant as this market is less likely to pay for accommodation. The VFR market contributes 40% of total spend in the region.[34]

4.6. The holiday market made up 28% of total visits to the region in 2023 and 32% of spend. Inclusive tours comprise 9% of the holiday market. Business visits, at 18% of total, will predominantly take place in the urban centres.

4.7. The East Sussex, Brighton and Hove and West Sussex Local Visitor Economy Partnership seek a growth in value over volume. [35] Inbound targets foresee an increase of 33% in the value of overseas visitors by 2034 over 2019 levels, (a £275m increase). Additionally the plan targets an additional increase in spend per night from £55 to £88 per night. (A total additional increase in spend of £650m and a 60% increase in per night spend levels over 2019). This target will be challenging and requires higher grade accommodation than is currently to be found in either administrative area. It is recognised that there is a need to map, define and develop a proactive accommodation plan for Sussex.

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[33] Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) Update, February 2024

[34] Office for National Statistics (2023) International Passenger Survey. Data is for the South East region as international arrivals data at a more localised level is not available.

[35] The three local authorities of East Sussex County Council, Brighton & Hove City Council and West Sussex County Council have formed a partnership to secure LVEP accreditation for the whole of the area. LVEPs are part of a national VisitEngland programme to establish a new structure for the tourism industry and maximise the potential of the local visitor economy. For further details see: https://eastsussexbrightonhovewestsussexlvep.com/

Volume and Value of Tourism to Rother and Hastings

4.8. Current data from Visit England/Britain and the ONS doesn't drill deeper than county level, but 1066 Country, Hastings BC, Rother DC and Wealden DC have commissioned Tourism South East (TSE) to conduct studies on the Economic Impact of Tourism since 2004. The latest results (from 2022) are shown in

4.9. Table 2 below. [36,37]

Rother

4.10. Tourism represents a key driver of Rother's local economy, attracting a total of 5.61 million trips in 2022. Of these, 5.21 million were day trips, while 0.40 million were overnight visits, resulting in approximately 1.76 million visitor nights spent in the area.

4.11. Visitor expenditure made a significant contribution to the local economy, with tourists spending an estimated £202 million during their trips—equivalent to around £16.8 million per month. Day visitors accounted for £94 million of this total, while overnight visitors generated £108 million. When multiplier effects are included, the overall value of tourism to the local area increased to £245 million, reflecting the extended economic benefits that tourism spending brings to a range of local businesses and services

4.12. Tourism also provides an important source of employment across Rother District. In total, 5,833 jobs are supported by the sector, including 4,975 direct tourism-related roles in areas such as accommodation, food services, and visitor attractions. An additional 858 jobs are sustained indirectly through wider economic activity linked to tourism expenditure. Overall, it is estimated that 21.6% of the district's population is employed directly or indirectly as a result of tourism, illustrating the sector's vital role in supporting livelihoods and sustaining the local economy.

Hastings

4.13. Tourism also plays a vital role in Hastings' local economy, with a year-round offering of cultural, arts and heritage events, in addition to the strong history associated with 1066 and the Battle of Hastings. In total, 6.1 million trips were undertaken, comprising 5.73 million day trips and 0.37 million overnight visits. Overnight visitors accounted for approximately 1.7 million nights spent in the area in 2022.

4.14. Tourism spending generated substantial economic value with an estimated £364 million spent during visits, equating to an average of £30.3 million injected into the

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[36] The Economic Impact of Tourism on Rother District 2022, TSE Research

[37] The Economic Impact of Tourism on Hastings District 2022, TSE Research. Tourism South East uses 'The Cambridge Model' which is an economic impact model that produces estimates from existing national and local information (e.g. accommodation stocks, inbound trips) of the level of tourism activity within a given local economy. From 2021 some definition and survey methodology changes were introduced to both surveys by VisitBritain, meaning that results are not directly comparable with data published for 2019 and previous years.

local economy each month. Of this, £151 million came from day visitors, while £123 million was generated by overnight stays. When multiplier effects are taken into account, total spending in the local area rose to £274 million, highlighting the broad economic benefits of tourism across multiple sectors.

4.15. Tourism also makes a major contribution to local employment, supporting an estimated 7,005 jobs in total, of which 5,163 are directly related to tourism activities such as accommodation, hospitality, and attractions. A further 1,842 jobs are sustained indirectly through multiplier effects, as tourism spending circulates through the wider economy. Overall, it is estimated that 20.4% of the Hastings Borough workforce is employed as a result of tourism, underscoring the sector's critical importance to the area's prosperity.

4.16. The headline figures show positive growth driven mostly by an increase in day visitors to the area. It is interesting to note the over-predominance of day visitors which reaches above 90% within 1066 Country. From this, the current 1066 Country Business Plan has identified a strategic priority to develop and enhance the volume and value of overnight tourism.[38]

4.17. Hastings Borough Council has invested significantly in tourism through the most recent Corporate Plan and Budget cycle, including the creation of a Strategic Tourism Lead to continue to grow the sector, investment in the town's heritage assets such as the new West Hill Café and visitor centre and Victorian West Hill funicular railway. Hastings has also submitted a bid to become the first UK Town of Culture in 2028. [39,40]

4.18. The key market for both Rother and Hastings remains Leisure and Holidays at around 75% of the total. Visiting Friends and Relatives makes up a further slice with business and events much lower with 'coaching' group markets also greatly reduced since COVID.

[38] 1066 Country Business Plan and 3-Year Action Plan 2024-2027
[39] Hastings' bid to become the Town of Culture 2028
[40] Hastings sees boost to local tourism industry

Table 2 – Tourism in Rother and Hastings 2022 (TSE Results)

	Rother	Hastings
Total Trips	5.61 m	6.1 m
Total Trips Spend	£202 m	£363.6 m
Day Trips	5.21 m	5.73 m
Day Trip Spend	£94.2 m	£150.7 m
Overnight Visits	0.40 m	0.37 m
Nights	1.76 m	1.7 m
Overnight Spend	£107.8 m	£122.9 m
Average spend in the local economy per month	£16.8 m	£30.3 m
Spend in local area as a result of tourism (taking into account multiplier effects)	£245.2 m	£273.6 m
Jobs Supported (direct, indirect and induced)	5,833	7,005

The Legacy of COVID-19 and Brexit, and the Impact of the Cost of Living Crisis on the Visitor Economy, the Accommodation Market and Changes to Visitor Behaviour

4.19. The 1066 Country Business Plan and Action Plan 2024-2027 identifies a number of key areas of influence as a result of events such as COVID-19, Brexit, and the cost-of-living crisis, which are affecting visitor behaviour in the area. These include:

- Growing environmental awareness and interest in responsible travel with benefits for coastal and rural regions such as 1066 Country
- A move towards localism and the unique identity of a destination as well as a desire to "discover what's on your doorstep" which includes the unique history and heritage of 1066 Country as well as the more contemporary food, drink and culture scene
- Pet friendly travel
- The rise of 'work-and-play-cations' – people choosing temporary locations for 'work from home'
- An appreciation of the outdoors and a growing thirst for adventure, experience and something different.
- 'Great value for money' continues to be an increasingly important destination influence for domestic holidays/short breaks. This is especially true in the current cost of living crisis.
- Fast, reliable internet connectivity is expected and online booking for attractions, restaurants etc. has now been normalised. This has led to a shift from print to digital marketing.
- Global conflicts are causing price fluctuations, lower consumer confidence and altering some outbound market choices with an impact on global tourism. [41]

[41] 1066 Country Business Plan and 3-Year Action Plan 2024-2027

4.20. Like all UK coastal and small-town destinations, Hastings and Rother suffered a sharp fall in footfall, takings and other visitor income during 2020/21. Some of the patterns that began during lockdowns have persisted, with more day visits from local markets, a rebound in domestic "staycations" once restrictions eased, and a stronger emphasis on outdoor, experience-led offers (coastal walks, outdoor events, heritage trails).

4.21. The pandemic demonstrated that STLs were much more resilient than other forms of accommodation and the privacy, independence and freedom that guests enjoyed then still remains sought after today. The cost of living crisis affects the majority of consumers with the price of energy, food, transport and other essentials leaving less available for leisure at the end of the month. Holiday accommodation is often flexibly priced particularly in the low season and can offer greater affordability than a more expensive traditional hotel or B&B.

4.22. The economic impact results shown in Table 2 above show that tourism remains a significant employer and contributor to local spend, but much of that is day-visitor related rather than higher-spend overnight stays. The value of the sector can be increased by supporting new accommodation provision through both economic strategies and planning policy.

4.23. Brexit reduced the pool of many seasonal and hospitality workers and has, together with increased NI costs for businesses and reduced relief on business rates from this April, increased costs for many visitor economy businesses, pressuring staffing for cafés, B&Bs and attractions amongst others. This has led some operators to become more cautious about opening hours and capacity reducing the productivity of assets. In many cases procurement and staffing has become costlier and more complex, increasing pressure on margins. [42]

4.24. Domestic consumers are tending to book closer to travel dates and prefer short breaks or day trips rather than longer overnight holidays. This increases volatility and makes revenue forecasting harder for small operators especially outside peak months. [43]

[42] Rother District Local Plan 2020 - 2040 Economy Background Paper Draft (Regulation 18) Version - April 2024
[43] Visit Britain (2025) Great Britain Tourism Survey - Domestic Overnight and Day Trips

The Impact of the Growth of Short-term Holiday Lets and Sharing Economy Platforms

Summary of Current Context

4.25. Following the easing of COVID-19 restrictions, STL properties proved more resilient than most other forms of accommodation and as a result, the pandemic increased the segment's client base. The UK STL market, particularly for domestic properties, has shown robust growth and resilience following the COVID-19 pandemic. STLs retained their expanded market share in 2024.

4.26. The number of UK domestic STL stays reached 8.3 million in 2023, with associated spending rising to £3.3 billion. Forecasts suggest growth to 9.1 million stays and £3.6 billion in spending by 2028.

4.27. STLs are valued for privacy, affordability, and self-catering facilities, which are especially attractive during periods of high inflation. "Things to do nearby" is the top factor for renters in choosing a holiday. Private and personalised experiences are increasingly popular and guests are seeking "curated, one-on-one experiences" like guided hikes or natural wine tastings.

4.28. Airbnb remains the leading booking channel (27%), with many bookings made last-minute and cost being a significant factor in decision-making. Younger adults (16–44) are the primary users, but the ageing population presents a significant opportunity. Over-65s prefer rural locations but are deterred by lack of hotel-like services.

4.29. The effects of Government plans for a registration scheme to manage short-term lets are being progressed with DCMS letting a £1.8m contract in May 2025 for the digital development work. At odds with the industry view that a level playing field is important, it is currently stated by government that the scheme will not apply to hotels, hostels or bed and breakfasts.

The Impact of the Growth of Online Travel Agencies on the Tourist Accommodation Market

The Landscape for OTAs

4.30. The tourism industry has gone from strength to strength since digitalisation with booking platforms transforming the route to market for many thousands of small British businesses in every part of the country. New product innovations, such as virtual tours, are delivered by major distributors and individual businesses, combining powerfully to offer the best deal to the consumer. The majority of holiday homes are privately owned but often use booking platforms, Online Travel Agents like Booking.com or other agents to find their customers.

4.31. Large UK brands including Awaze (Hoseasons & Cottages.com) and Sykes Holidays offer thousands of properties working alongside more specialist companies that have a long-standing regional expertise. Digital guidebooks have transformed the way in which guests understand how things work, the facilities on offer and what there is to see and enjoy. Digital dashboards have also transformed the way in which owners understand how their business is performing.

Impact of OTAs

4.32. The rise of OTAs has significantly influenced the tourist accommodation market. These platforms offer greater accessibility and convenience for consumers, allowing easy comparison and booking of various accommodation options. In 2025, 49% of hotel guests made their most recent booking via an OTA.[44] Figure 1 below, part of the survey of accommodation providers, reports which channels are favoured by a sample of those operating in the area.

4.33. Airbnb is the largest booking channel for STL properties, accounting for 27% of consumers' most recent STL property booking made in the three years ending April 2023. Generalist OTAs, such as Booking.com and Expedia, accounted for 23% of consumers' most recent STL property bookings.[45] Businesses in Rother and Hastings have embraced OTAs to help market accommodation with Figure 1 above showing which OTAs are favoured among a sample of local businesses. [46]

4.34. These platforms have intensified competition among accommodation providers by highlighting price and availability, pushing hotels and rental properties to offer competitive rates and added value. This transparency benefits consumers but pressures providers to maintain high standards and competitive pricing.

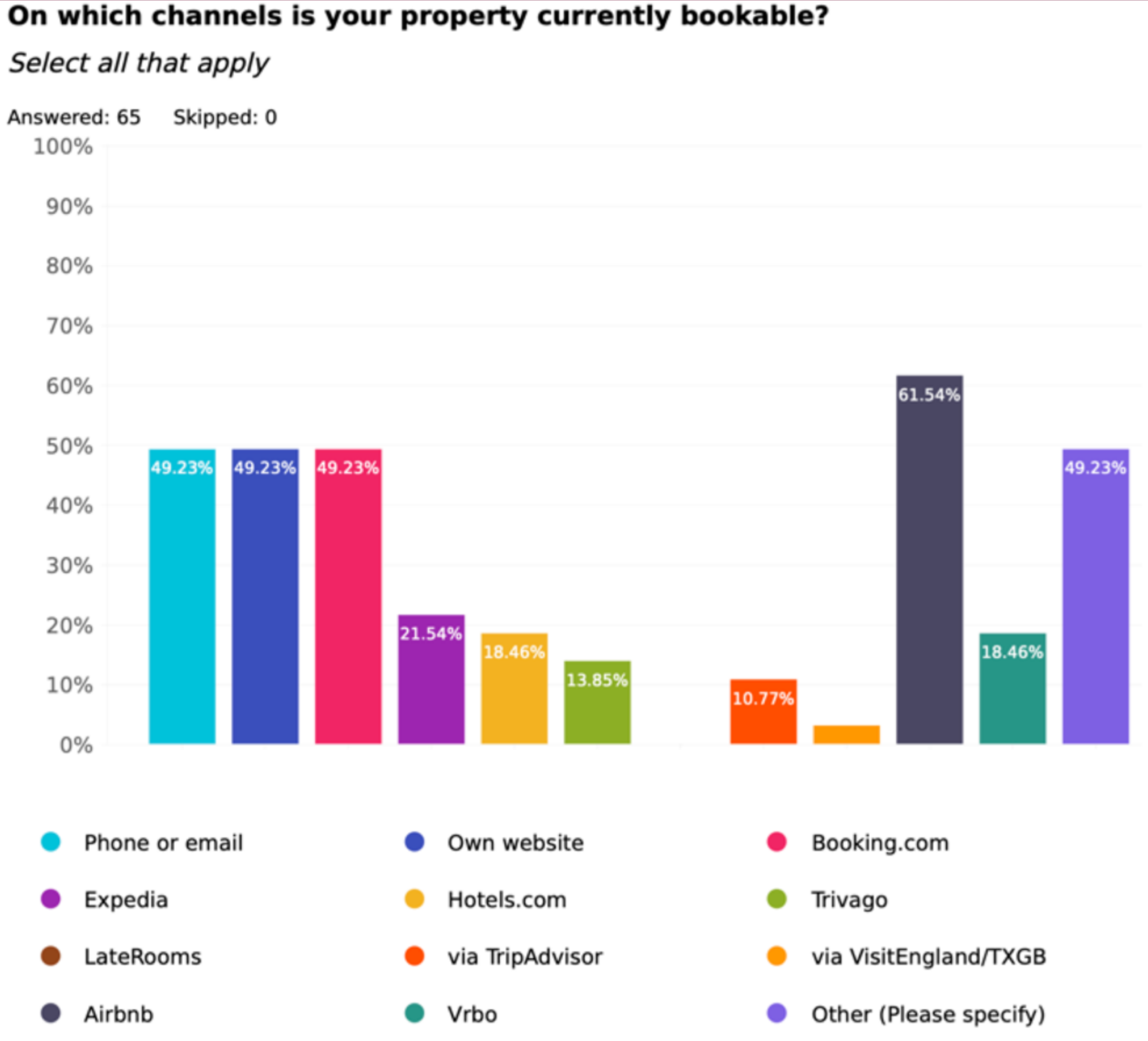
4.35. Accommodation providers are adapting by enhancing their direct booking capabilities and offering exclusive perks for direct bookings. Additionally, hotels and rental properties are leveraging OTAs for marketing and broader reach while developing loyalty programs to retain customers.

[44] Mintel (2025) Hotels UK 2025

[45] Source: Holiday Rental Properties UK, 2023, Mintel

[46] Tomorrow's Tourism – Survey of accommodation providers in Rother and Hastings undertaken in August 2025

Figure 2 – On which Channel is your property currently bookable?



Other channels include:

- Coolstays
- Cottages.com
- Canopyandstars.co.uk
- EVIIVO
- Group accommodation
- HolidayCottages.co.uk
- Hoseasons
- Kip Hideaways
- Local agent
- Oliver's Travels
- Plum guide
- Rye & Beyond Holiday Cottages
- Sykes cottages
- Travel Chapter
- campsites.co.uk
- PitchUp
- Hipcamp)
- Campsites.co.uk

5. Tourist Accommodation Supply in Rother and Hastings

Current supply of Visitor Accommodation

The Picture across both Authorities

5.1. A total of 213 businesses were recorded in the 2026 Tourism Economy audit across both authorities, of which 46% are serviced accommodation and 54% non-serviced. These are the professional business sector that will normally pay business rates and VAT and usually employ people.

Table 3 – Tourism Economy Accommodation Supply – Establishments

Category	All	%	Rother	%	Hastings	%	Sub-Category	All	%	Rother	%	Hastings	%
Serviced	99	46%	66	40%	33	67%	Hotel	33	14%	23	13%	10	19%
							Hotel – Branded Budget	5	2%	0	0%	5	9%
							B&B / Guest House	44	19%	27	15%	17	32%
							Pub / Inn	16	7%	14	8%	2	4%
							Residential Accommodation	3	1%	3	2%	0	0%
Non-Serviced	114	54%	98	60%	16	33%	Self-Catering Apartment	8	3%	0	0%	8	15%
							Self-Catering House / Cottage	62	26%	59	32%	3	6%
							Holiday Park / Lodge	5	2%	3	2%	2	4%
							Glamping Site	16	7%	16	9%	0	0%
							Camping / Caravan Site	29	12%	26	14%	3	6%
							Private Static Caravan Park – Some for Hire	15	6%	12	7%	3	6%
Total	213		164		49			236		183		53	

5.2. The left-hand category column of Table 3 records the number of businesses while the right-hand column shows Sub-categories recording the type of accommodation found within these businesses – which may be more than one type. The total by sub-category adds up to more than the overall number of establishments as it captures businesses which operate across more than one sub-category. The Tourism Economy is defined as establishments that are professionally run, usually have a website, may employ people and usually pay VAT. Self-catering covers the self-catering units not listed on Airbnb.

Overview of Rother

5.3. As at January 2026, there are 164 accommodation establishments operating in the tourism economy in Rother District. The maps in the associated Asset Audit Report show the distribution of these properties across the District, further tables of detail are given in Appendices IA – IC.

5.4. 40% of the offer is serviced with 60% non-serviced. Rooms offered by serviced establishments total 774, more than double the non-serviced offer of 372. The number of rooms per property average 11.7 in serviced accommodation and 3.8 in non-serviced. These figures do not include camping, caravan sites and holiday park sites, which account for 88% of the district's bed spaces and remains a key element of the visitor economy and more important than most other administrative areas.

Image 3 – Rother: a comprehensive outdoor offer

2018 – 2025 Comparison

5.5. Most tourism economy accommodation categories appear to have declined since the last accommodation audit was conducted in 2018 with a 61% loss in the total number of establishments (see Table 3). Categories that have seen the most marked declines include self-catering properties (-79%) and B&Bs/Guest Houses (-61%).[47]

[47] Tourism South East Research (2018) Rother District Visitor Accommodation Audit

5.6. This reflects the national trend and is not so much a 'reduction' as the result of a switch to the Sharing Economy by many operators, as can be seen by Figure 1 in Section 4 above. In many there has been a switch in sub-category as previous B&B and guest house owners turn to newer distribution channels like Airbnb, which provides a greater incentive to run on a self-catering basis. This is also evident in the significant increase in Airbnb properties recorded.[48]

Serviced Accommodation

5.7. A total of 112 serviced establishments in 2018 has decreased to 66 establishments in the 2025 audit but it is to be noted that over a longer term 20-year timeframe establishment numbers have remained remarkably similar. The number of hotels has remained constant at 26, while the number of rooms has increased by 9%. B&B's/guesthouses have seen a significant drop of 61% in the number of establishments, while the number of pubs/inns with rooms has decreased by 13%. This also indicates a tough trading landscape for pubs more generally with disposal / change of use applications more prevalent. The serviced stock is varied with 33 hotels of different standards, but surprisingly no budget hotel provision, 27 B&Bs and 14 pubs with rooms. Flackley Ash Country House pictured below represents one of the larger hotels in the District at 44 rooms.

Image 4 – Flackley Ash Country House Hotel, Peasmarsh

Non- Serviced Accommodation – Self Catering

5.8. The 2018 audit recorded 281 self-catering establishments. In the current audit this figure is significantly less, at 59, representing a 79% decrease. However, over the

[48] Properties sold through Airbnb have been removed from the Tourism Economy master list to avoid duplication as these are reported in detail in the later section. Significant numbers of Airbnb properties may be sold through other channels. Some Tourism Economy businesses may also use Airbnb as a sales channel but if so, it will not be their principal sales channel.

same period, there has also been 319% increase in sharing economy establishments (i.e. those listed on Airbnb/Vrbo). Although not all properties listed on Airbnb are self-catering, this still highlights the large number of establishments which have moved to using these sales platforms.

Non- Serviced Accommodation – Camping and Caravan Sites

5.9. The area has a large number of camping and caravan sites but the number has seen some decline since the 2018 audit. Sites are relatively large compared to many other parts of the UK (though smaller than Hastings) providing an average of 83 pitches per site.

5.10. South East England has a relatively high number of holiday parks and campsites, including the 2nd highest number of touring pitches, glamping units and rented holiday caravans.

Table 4 – Composition of England's holiday park and campsite sector

	Number of holiday parks and campsites	Touring Pitches*	Glamping **	Pods	Privately-owned holiday caravans	Rented holiday caravans	Privately-owned lodge/ chalet/ cottage	Rented lodge/ chalet/ cottage	Total pitches
East Midlands	571	10,103	136	85	19,094	2,530	1,143	791	**33,882**
East of England	639	11,495	326	121	24,066	5,274	1,998	1,146	**44,426**
North East England	181	3,445	101	49	10,675	1,908	565	113	**16,856**
North West England	545	9,611	342	223	20,942	2,244	2,654	852	**36,868**
South East England	580	14,987	385	102	19,995	6,003	2,812	1,201	**45,485**
South West England	1,133	36,787	882	313	24,529	10,500	3,764	3,783	**80,559**
West Midlands	482	7,591	157	55	6,661	613	799	193	**16,069**
Yorkshire	623	14,182	435	163	25,201	2,902	3,044	830	**46,756**
England	**4,754**	**108,200**	**2,764**	**1,112**	**151,163**	**31,974**	**16,778**	**8,910**	**320,901**

Source: Frontline Holiday Park and Campsite Operator Survey, 2023
**Includes touring caravans, motorhomes/campervans and tents*
***Yurts/wigwams/other excluding pods*

Non- Serviced Accommodation – Holiday Park / Lodge

5.11. Holiday Parks have seen a reduction in number since the 2018 baseline year with the closure of Pontins in Camber a setback in terms of holiday park capacity, given the 500 to 800 chalets on that site. Three parks remain at Bluebell Coppice Park, Crowhurst Park and Wylands Farm. The Pontins site, owned by Britannia Hotels, closed in late 2023 offers an opportunity for continued leisure use and the pro-active support of the Council, as freeholder, would be beneficial in this regard given Britannia's public commitments to providing renewed leisure use at the site. Other operators, such as Centre Parcs, review such investment opportunities regularly and such sites are sought after and relatively rare with a site in Sussex still likely to be sought, further to the company abandoning the Oldhouse Warren site near Crawley in 2021.

Static Caravan / Semi-Residential Sites

5.12. In addition to the 42 camping, caravan and glamping sites, the audit recorded a number of private static caravan sites: nine advertising some units as holiday lets; three sites operating solely as private holiday parks. A further circa 70 sites were identified as operating on a semi-residential basis, with an estimated combined capacity of 3,492. These were not included in the main audit as they are not strictly tourism accommodation, but there are likely to be a high proportion of units on these sites which operate akin to second homes, i.e. privately owned and used by one household, rather than being available for use by visitors.

5.13. These sites typically have a mix of accommodation, both owner occupied, let through the site owners or via agencies or where privately owned caravans or lodges are for sale. Of the 70 sites, up to a nine can be seen to operating at the margins of the Tourism Economy and one is likely to be advertising units using Sharing Economy channels.

Accessible Accommodation

5.14. In terms of accessibility, 13 tourism economy establishments (8% of all establishments) were found to have measures in place. The establishments are comprised of five hotels, four self-catering properties (including one lodge park), two pubs/inns, one B&B, and one glamping site. The measures in place include ground floor rooms, walk-in showers, wheelchair accessible features and neurodiversity measures. [49]

[49] Accessibility information is not available as part of the Sharing Economy dataset. Information relating to accessibility measures is difficult to source.

Overview of Hastings

Image 5 – The White Rock Hotel – Hastings

5.15. There are 49 accommodation establishments operating in the tourism economy in Hastings. 67% of the offer is serviced with 33% non-serviced. However, rooms offered by non-serviced establishments far exceed those of serviced properties due to the presence of two large holiday parks - Combe Haven Holiday Park and Shear Barn Holidays and Touring – with a combined total of 2,160 rooms, 98% of Hastings' non-serviced rooms. [50]

5.16. Business Tourism can also be an important growth market for Hastings, which will be served primarily by the serviced sector. Meeting or conference facilities are advertised by seven properties (13% of serviced properties); six of the 15 hotels, as well as one guest house with a total of around 12,000 square feet of meeting space available across the town.[51]

2018 – 2025 Comparison

5.17. Hastings has seen a reduction in the number of establishments combined with a change from serviced to non-serviced stock. The White Rock Hotel, shown above, is one of only ten full-service hotels remaining in the borough. While number of tourism economy establishments has reduced, the effect on the number of bedrooms has been limited.

[50] Tomorrow's Tourism visitor accommodation audit 2025. See Table 3 – Tourism Economy Accommodation Supply – Establishments for a breakdown by type.
[51] CoStar (2026) Sussex Regional Report

Serviced Accommodation

5.18. Serviced accommodation in Hastings has declined by 54% (-26% bedrooms) from 74 properties to 34 since VisitEngland's 2016 Accommodation Stock Audit, reflecting a national trend although the longer-term trend likely to be more nuanced. Much of this apparent 'reduction' is the result of a switch in category with previous B&B and Guest House owners turning to newer distribution channels, like Airbnb, which provides a greater incentive to run on a self-catering basis. There are an estimated 1,100 properties actively operating on Airbnb and Vrbo in Hastings in 2025. This is relatively high and double the number in Eastbourne. An estimated 76% of these are likely to be dwellings suitable for normal residential living.

Non- Serviced Accommodation – Self Catering

5.19. Similarly, many self-catering establishments will have moved to sharing economy distribution channels, accounting for the apparent loss in this category – from 51 in 2016 to 11 in 2025, a 78% decrease in establishments and a 59% decrease in the number of bedrooms.

Non- Serviced Accommodation – Camping and Caravan Sites

5.20. Camping and caravan sites account for 34% of Hastings' bed stock. Sites are relatively large compared to many other parts of the UK, providing an average of 114 pitches per site (the average number of pitches per site for England is 68).[52] This category has seen an increase from six to eight sites. There are employment benefits from the larger sites such as Shearbarn Holiday Park which supports 21 jobs. Draft Policy E6 Outdoor Visitor Accommodation sees new, expanded or improved caravan, chalet, camping or other outdoor visitor accommodation supported subject to meeting a range of tests.

Static Caravan / Semi-Residential Sites

5.21. Of the six sites, three have private units for hire with some used as semi-residential.

Accessible Accommodation

5.22. In terms of accessibility, 6 tourism economy establishments (12% of all establishments) were found to have measures in place. These are comprised of five hotels and one B&B/guesthouse, with measures including ground floor rooms, wheelchair-friendly rooms and neurodiversity measures. [53]

[52] UK Caravan and Camping Alliance (2024) Pitching the Value 2024 Economic Benefit Report: Holiday Parks and Campsites England

[53] Accessibility information is not available as part of the Sharing Economy dataset. Information relating to accessibility measures is difficult to source.

Scale of Loss of Tourist Accommodation Stock

5.23. Across all serviced categories, there remains pressure to modify to self-catering operation or change out of the hotel category and / or dispose of assets. For many businesses, current margins do not enable enough revenue for further investment. A range of circumstances including the nature and size of the business; the life stage of proprietors; the requirements to renew out-dated stock; and declining occupancy rates combine to make exit an appealing prospect for many operators.

Current supply of Sharing Economy Accommodation

5.24. The Sharing Economy is to some extent simpler to report as it is largely self-catering stock (95%) usually in residential dwellings that are registered for council tax rather than business rates. Some of the professional tourism economy businesses will use websites like Airbnb to help convert sales but in such cases, they will typically use the platform as one sales channel, or for certain units, within the business.

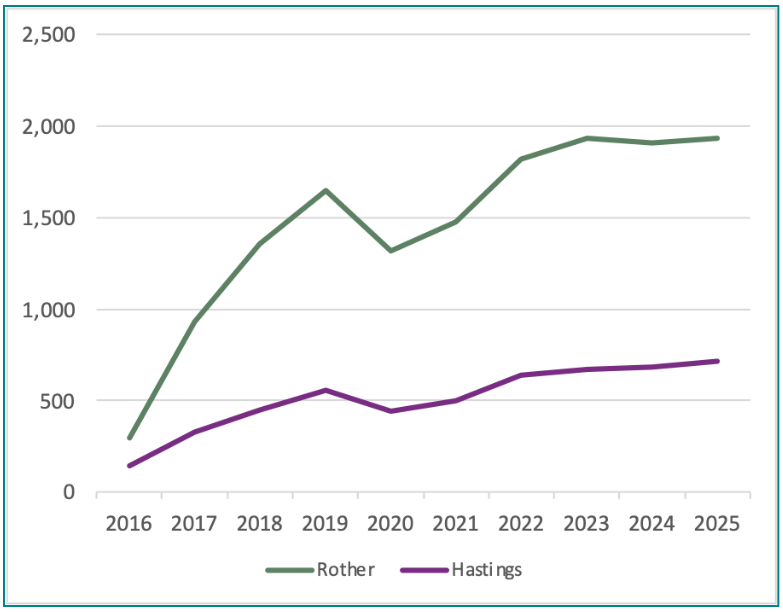
5.25. Table 5 below shows the complete landscape as regards the numbers of establishments across both economies within the two administrative areas. This shows a proportionally higher percentage within the Sharing Economy than the normal distribution ratio of around 20% : 80% between the Tourism : Sharing economies. Bedroom numbers are typically low, averaging 1.9 rooms per property.

Table 5 – Total Visitor Accommodation in the two Administrative Areas

	Rother	%	Hastings	%	Total
Tourism Economy	182	9.3%	53	4.3%	235
Sharing Economy	1,800	91.6%	1,187	95.7%	2,987
Total	**1,964**		**1,240**		**3,222**

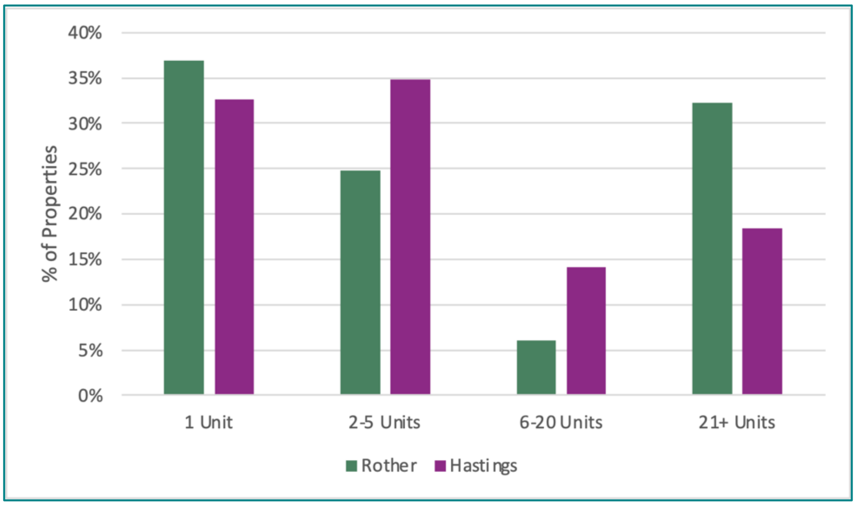
5.26. Growth in listings has reflected the national trend with very rapid growth from 2016 to 2020, dropping during the pandemic and growing at a more gradual pace since. Supply is now more limited and not likely to resume its pre-Pandemic growth rate.

Figure 3 – Sharing Economy Growth Rate 2016 to 2024 (Available Listings)



5.27. Many hosts have more than one unit available for rent, reflecting the scale of the sector as a business and source of income. In Rother 64% of hosts are operating more than one property, while in Hastings the figure rises to 68%. This could either mean that the beneficial owners have asked an agent to market the property on their behalf, (more likely) or that they are the actual owners, operating a range of properties across the administrative areas (less likely). In such cases it is likely that this will be a business.

Figure 4 – Sharing Economy – Unit Management



5.28. 28% of active units in Rother and 15% in Hastings use a property manager, the most prominent companies being Cottages.com, Camber Getaways, My Property Host, Sykes Holiday Cottages, Kent & Sussex Holiday Cottages and We Love Property. As can be expected, there are higher densities of units around the more populated and popular coastal areas including Hastings (particularly around the seafront), Camber, Rye, Bexhill, Battle – please see the associated Asset Audit for more detail. Overall occupancy rates are typically 53%, lower than Eastbourne at 57% and Derbyshire at 62%. Weekly occupancy demonstrates a standard profile, typically increasing on Friday / Saturday and being lowest during the first 3 working weekdays.

Image 6 – Ebbtide A typical 2 bedroom beach house - Camber Sands

5.29. Appendix 1C breaks down the Sharing Economy in a way that can inform the development of future policy. It shows that there are 8,242 properties in Rother and Hastings that have been registered at some time in the last decade on either Airbnb or Vrbo. While a lot of individuals are registered on the system the analysis here is based on those units that have traded in the last twelve months.

5.30. When assessing change of use it would normally be likely that single rooms let out in dwellings would not be subject to any such policy as the homeowner would likely be operating under the Rent a Room Scheme.[54] The percentage of Room Only Active Units ranges from 9% in Rother to 25% in Hastings. The higher Room only percentage in Hastings is likely to indicate individual hotel rooms being sold via Airbnb, rather than rooms being let in residential dwellings.

[54] It should be noted that a small number of properties (41 or 1.3%) are offering more than one room as 'Room only' listings - with shared bathrooms such as the White Anchor in Hastings. Such properties are more likely to be operating as businesses.

5.31. The ratio of active trading units as a proportion of all dwellings is higher in the study area (Rother 4.3% and Hastings 2.9%) than benchmarks seen elsewhere, such as leisure tourism hotspot Derbyshire Dales (2.3%) or Eastbourne, a similar coastal resort (1.2%).[55] Just over 2,500 of these are entire properties that have been active in the last year: 1,646 in Rother and 892 in Hastings. It should be noted there are likely to be properties using other channels so this figure under-estimates the extent of STLs but is accurate in terms of the quantum. A breakdown by number of rooms is also given, reflecting in part a greater proportion of smaller properties in Hastings. In revenue terms, Rother properties benefit from higher price / higher occupancy although this distinction reduces in properties of 5-6 rooms and is reversed in properties of over 6 rooms. Some of these outliers are also likely to be operating as trading businesses rather than residential dwellings.

5.32. The column for Rye and Camber shows that over a third of dwellings in the two Parishes are being let through these two channels over the last year. Indeed 961 (53%) of the 1,800 active STL units in Rother are situated in these two parishes. This is unsurprising given the area's long established popularity as a visitor destination but the level may create social and environmental issues, particularly around the provision of services and may also lead to a lack of housing availability for local residents. Further analysis of the type of housing that exists in Camber would be helpful as many small chalet type holiday houses may not always be suitable for residential living.

5.33. The national statutory registration scheme may give the opportunity to identify the exact number of properties, although the impact of the scheme may have some impact on the number of STLs being made available due to compliance costs. Criteria that can inform the likely scale and scope in the interim include cross-checking the data used in this report with:

- Council tax database (where there are 1,174 properties in Rother and 758 properties in Hastings registered as second homes / the NNDR database);[56]
- Web search to identify multi-channel marketing of properties;
- Review of outlier properties offering Room only with multiplier rooms, together with properties of more than 4 beds.

[55] This is also higher than the level reported by ESCC in the Airbnb task force of 1.3% for all of Rother using 2023 data - although the categories of holiday homes vs Airbnbs may not be fully comparable.
[56] The Rother District Council Airbnb Task and Finish Group identified a total of 568 second homes and short term lets in Camber (173; Rye & Rye Foreign (255); and Icklesham (140).

6. Tourist Accommodation in Rother and Hastings – Current Performance

The Implications of National trends for Rother and Hastings

6.1. A range of national trends can inform the visitor economy strategies in both administrative areas. There is rising demand for rural STLs and a well-resourced *Baby Boomer* related market that is now growing older. Table 7 below summarises these trends and assesses their relevance for both administrative areas with three stars representing the strongest potential.

Table 6 – The Potential of Wider trends for the study area

National Trend	Hastings Borough Council	Rother District Council
Glamping & Unique	*	***
Rural STLs		**
Appealing to Older Visitors	***	***
Sustainability / Community	**	**
Local Host Opportunities	**	**
Group Friendly	***	**
Digital First	**	**

Glamping and Unique Stays

6.2. Rother is well-placed to tap into the growing appetite for glamping and experiential stays in nature, especially among younger, higher-spending travellers.

Rising Demand for Rural STLs

6.3. Rother, as a largely rural destination, aligns with the rising preference for countryside stays. The appeal of natural beauty, outdoor activities, and tranquil settings fits the profile of STL guests—especially older adults seeking quiet, well-serviced locations.

Appealing to Older Visitors

6.4. With older adults being more selective, properties could gain traction by offering hotel-like amenities such as housekeeping, reception services, or accessibility features like ground-floor bathrooms and step-free access. Enhancing accessibility, comfort, and customer service could support the region in capturing more of the growing senior market, especially through all-inclusive packages and transport services.

Sustainability and Community Impact

6.5. Brands like Sykes Holidays (a Certified B Corp) emphasise environmental responsibility. Building further on the work of the councils in sustainability, encouraging sustainable practices among STL providers in the area could help improve local acceptance and preserve the area's character. 50% of consumers booking a holiday rental would prefer for the property to have a sustainability certification.[57]

Opportunities for Local Hosts

6.6. There is increasing desire for visitors to be rooted in the local communities when staying in holiday accommodation. 59% of potential customers would want to book with a host that promotes and connects to local activities and experiences and so those operators that draw on for example, local food and drink, are likely to be more successful. Providers offering large holiday cottages in Rother / well-appointed apartments in Hastings are likely to perform best.

Group-Friendly and Flexible Accommodation

6.7. Demand for family rooms, adjoining rooms, and apartment-style facilities suggests that diversified lodging formats—including aparthotels, high-end self-catering cottages and farm-based accommodation—could thrive. Aparthotels would be an ideal option when reconfiguring existing buildings in and around Bexhill seafront while high quality self-catering accommodation, using converted agricultural or other buildings with central facilities added, can provide businesses which are year-round in operation in many parts of rural Rother including the coastal hinterland.

Digital Strategy

6.8. Strong online booking functionality and user-friendly presentation of local experiences—such as walking tours, farm visits, or wellness retreats—can help smaller operators compete more effectively.

[57] Para 6.6 and 6.7 – Mintel (2025) Holiday Rental Property – UK – What consumers want and why, page 14

Key trends and issues in the local market

6.9. Interviews with local businesses indicated a number of strengths and weaknesses:

Rother's Strengths

- High Potential but needs investment in partnership marketing
- A diverse offer encompassing rural, small towns and coastal offer
- Significant established visitor destinations such as Rye and Camber
- History and heritage / 1066

Hastings' Strengths

- Year Round events programme
- Potential of Hastings given market conditions with new accommodation such as the Premier Inn raising quality and confidence
- The regeneration of the town centre via the Town Deal with the Green Connections Project to improve town centre public realm and a redeveloped Castle site.
- St. Leonards growing and with potential
- Continued investment by major private sector players, such as Park Holidays

Rother's Weaknesses

- Needs better infrastructure including public transport
- Improve coordination and collaboration across public / private tourism sectors
- Help sort staffing issues within private sector
- Speed up planning process
- Lack of quality accommodation and some sectors reportedly at saturation point e.g. glamping

Hastings' Weaknesses

- A perception that the Council were withdrawing support in various ways – less investment into 1066 Marketing and other tourism partnerships
- More support required for new businesses entering the market
- A range of outdated accommodation stock that requires investment or change of use.

6.10. On a more general level, survey respondents indicated that the most pressing issues that have constrained their business in the last 5 years have related to demand – notably the impacts of the cost of living crisis and COVID-19. There is concern over the lack of growth in the economy and the impact of the cost of living crisis. Taxation and planning policies were also identified as constraints. Appendix V shows a range of other comments and concerns - note that the sample is relatively limited.

The Role of the Hastings Visitor Accommodation sector relative to the wider 'Rother and Hastings Tourism market'

6.11. The accommodation market is a fundamental cornerstone for the successful operation and value-added visitor economy. In both Rother and Hastings there is a need to support new and refurbished accommodation at higher price points that can extend length of stay and attract overseas visitors. Current occupancy levels means that viability tests typically used by commercial hotels and their advisors are not likely to be passed. This is not helped by the current investment climate although this is now slowly improving. Boutique offers like the 58 room Crafted at Powdermills near Battle, and the nine room The Old Rectory in Hastings shows the potential. There needs to be a concerted push to attract and support more of these sorts of contemporary accommodation formats from independent smaller operators. Opportunities exist to reshape the way tourism is treated across both Councils which may provide the means to offer support to newer entrants to the market.

7. Overview of Planning Policy, Impacts & Current Relevance

Hastings

7.1 This section provides an overview of the existing planning policy framework relevant to visitor accommodation in Hastings. It outlines policies in the adopted plan and the emerging Regulation 18 (2026) Draft Local Plan.

7.2 Following the policy overview, an analysis is made of recent planning history relating to visitor accommodation to understand the general patterns of approval/refusal over time, the distribution of applications as regards to the areas prioritised for visitor accommodation and how decision-makers have been applying the relevant policies in practice.

Planning Policy Overview

Adopted Development Plan Documents

7.3 The adopted Hastings Development Plan comprises:

- *Local Plan – Planning Strategy (adopted 2014)*
- *Local Plan – Development Management Plan (adopted 2015)*

These documents remain the statutory basis for decision-making until the new Local Plan is adopted.

Supplementary Planning Document (SPD)

7.4 The 2015 SPD - Retention of Visitor Accommodation supplementary document is supports policy E4 of the 2014 Planning Strategy. It provides detailed viability and marketing criteria for assessing proposals involving the loss of visitor accommodation. The SPD remains in force and is still used in development management.

7.5 The Regulation 18 (2026) consultation Draft Local Plan seeks to revise the approach to retention and change of use, but until adoption, the SPD continues to guide decisions on development.

Hastings Local Plan – Planning Strategy (2014)

7.6 Policy E4: Tourism and Visitors is the primary adopted policy relating to visitor accommodation. The policy identifies that *'the tourism industry is vital to the* *economy of Hastings and is key to meeting our overall regeneration objectives'.* The supporting text further identifies key themes, including 'a *lack of quality visitor accommodation'* – and that *'self-catering accommodation, mainly caravans and camping, actually provide more spaces than the traditional hotels and guest houses'.* The supporting text states an intention to promote year-round '*business tourism'* and to move away from more restricted seasonal patterns of activity.

7.7 The policy identifies the intended priority areas for new accommodation, stating that *'new visitor accommodation will be directed to the Seafront, the main arterial routes, and close to other generators of demand'.* The policy more generally states that *'extension to existing visitor accommodation will also be supported, subject to design and location policies.* Outside of these areas change of use away from visitor accommodation is generally resisted, unless the viability criteria set out in the 2015 SPD are met.

Hastings Local Plan – Development Management Plan (2015)

7.8 Policy CC1: Caravan, Camping and Chalet Sites sets criteria of acceptability for new sites and expansion or intensification of existing sites. The loss of such accommodation is already addressed through Policy E4 and the SPD. The supporting text of CC1 notes that '*the Local Plan does not include a specific policy criterion requiring the use of caravan, camping and chalets sites* on a seasonal basis only. However, *assurance that the premises shall not be occupied as a person's sole or main place of residence will be dealt with by condition of the planning permission.'*

The Retention of Visitor Accommodation SPD (SPD) 2015 is of particular importance in the assessment of planning applications, supporting implementation of Policy E4 of the Core Strategy to ensure adequate supply of visitor accommodation and protect existing premises where there is good prospect of the use continuing. Specific criteria are given depending on size with larger premises required to meet a greater number. The SPD does not apply to dwellings where one or two rooms are being used for guests.

Draft Local Plan

7.9 The Council published its Regulation 18 Preferred Options Local Plan for consultation between 19 February and 7 April 2026 and contains the following policies relevant for visitor accommodation. This replaces previous Reg 18 draft versions.

7.10 Policy SP1: Directing Growth relates to the overall development strategy for Hastings with the Town Centre the primary location for visitor accommodation, with smaller more local related developments directed to District and Local centres. Identifying the importance of District and Local Centres differs from the existing strategy (see map below).

7.11 Policy SP4: Business Development - Retail and Leisure Uses: SP4 updates and broadens the approach previously contained in Policy E4 of the 2014 Core Strategy. It supports tourism uses including hotels and serviced accommodation on the seafront, town centre, district areas and Bohemia Focus Area and other locations where there is good public transport access.

7.12 Regarding retention of visitor accommodation, SP4 states that loss of accommodation will only be permitted where it is demonstrably not required on the basis of marketing evidence.

Policy R1: Hastings Central:

7.13 R1 provides the detailed spatial framework for the Town Centre. It supports:

- employment-generating uses including hotels and visitor facilities;
- mixed-use development including residential on upper floors;
- active ground-floor frontages;
- regeneration of key sites in the Station Area and Hastings Central Plaza.

R1 confirms that visitor accommodation is appropriate and supported within Hastings Central as part of encouraging a vibrant, mixed-use centre.

Policy E5: The Visitor Economy:

7.14 E5 is the principal Reg. 18 policy for visitor accommodation. It provides a comprehensive framework covering:

7.15 Serviced visitor accommodation - New and extended serviced accommodation including hotels and bed and breakfast is supported where:

- located in Hastings Town Centre, the Resort Area, or established tourism locations;
- of appropriate scale, type and appearance;
- does not compromise residential amenity;
- provides acceptable amenity for occupiers;
- does not result in the loss of residential accommodation.

7.16 Loss of visitor accommodation - Loss is only supported where there is no reasonable prospect of retention, demonstrated through a detailed marketing and viability exercise. Requirements differ inside/outside priority areas and include:

- 12–36 months of performance and cost evidence;
- evidence of investment and repositioning;
- independent specialist opinion;
- targeted marketing using industry brokers.

This is significantly more detailed than the 2015 SPD and reflects updated evidence and housing pressures.

7.17 Non-serviced visitor accommodation - New and extended non-serviced accommodation (holiday apartments, STL) is supported where:

- appropriately located;
- meets amenity and safety standards;
- does not result in loss of residential accommodation;
- is not within the curtilage of a residential property.

7.18 Short-term lets reverting to dwellings - Where a lawful dwelling previously used as an STL seeks to revert to residential use, no retention test applies.

7.19 Visitor attractions - New and upgraded visitor attractions are supported in the Resort Area, subject to amenity considerations.

7.20 E5 is therefore the central policy managing serviced and non-serviced visitor accommodation and will replace Policy E4 of the 2014 Core Strategy upon adoption.

Policy E6: Outdoor Visitor Accommodation

7.21 E6 provides the detailed framework for outdoor visitor accommodation (caravan, chalet and camping sites). Proposals for new, expanded or improved sites are supported where:

- landscape and character impacts are acceptable, particularly regarding the High Weald National Landscape;
- residential amenity is protected;
- facilities directly relate to holiday use;
- accommodation meets amenity standards;
- traffic impacts are acceptable and sites are accessible;
- touring pitches are retained;
- green and blue infrastructure is incorporated;
- occupation is seasonal, secured by condition or legal agreement.

7.22 E6 replaces CC1 upon adoption and provides a landscape-led approach to the provision of outdoor accommodation.

Spatial Focus Area Policies of the adopted Hastings Core Strategy 2014

7.23 As mentioned, Policy E4 of the adopted Core Strategy generally directs visitor accommodation to the Seafront, 'arterial routes' and 'generators of demand', whilst also seeking to retain sites on the Seafront and in the Old Town and Town Centre.

7.24 The 2014 Core Strategy divides the Local Authority area into 6 'Focus Areas' (Eastern, Central, Western, Town Centre, Central St Leonards and Seafront. The Strategy includes separate policies for each of the Focus Areas, regarding ambitions to retain, improve and/or increase visitor accommodation (with the exception of Central St Leonards). The adopted 2015 DMP introduced an additional layer of precision, further subdividing the 2014 scheme into 13 Focus Areas. Only 1 of the associated FA Policies references visitor accommodation within a specific policy objective (Policy HTC6 of FA8 (Town Centre). The 2015 DMP also introduces Policy CQ1 Cultural Quarters which defines four cultural areas where visitor activities are encouraged.

Observations

7.25 The Council has policies within the development plan to promote new tourist accommodation and to protect existing stock. The existing policies can be summarised as:

- **E4** of the adopted **Planning Strategy 2014** directs the distribution of new visitor accommodation, seeks to retain serviced sites in priority areas, and resist the loss of sites elsewhere in the Borough.
- The **Tourist Accommodation Retention SPD 2015** details how the intentions of E4 should be implemented, via a range of criteria and evidential requirements,.
- **CC1** additionally sets criteria for the expansion of camping sites.

7.26 The Regulation 18 (2026) Draft Local Plan updates the visitor-accommodation framework to reflect changes in visitor behaviour, the growth of non-serviced formats and short-term lets, national policy developments, potential Use Class C5) and the need for clearer retention policies.

7.27 The emerging plan strengthens the Town Centre focus for visitor accommodation (SP1, R1), provides a comprehensive policy for serviced and non-serviced visitor accommodation (E5), updates the approach to outdoor accommodation (E6), 7.28 Together, these policies establish a contemporary direction that aligns visitor accommodation with wider regeneration objectives.

Planning Impacts Overview ('churn')

7.29 To assess churn, 23 visitor accommodation related applications covering a five year period were reviewed. Larger applications of more than 15 rooms relate to just three sites so the loss/gain in volume of rooms in Hastings is driven by a handful of applications. Appendix IIA presents a summary plot of gains and losses while Appendix IIB presents an annotated version of the same plot. Appendices IIE and IIF present the spatial distribution of the applications.

7.30 Hastings is characterised by applications that are comparatively large and focussed around the town centre. The background pattern of dispersed smaller new-site applications (1-4 rooms/units) that pervades across Rother does not generally extend into Hastings.

7.31 Almost all applications relate to a stated (or likely) C1 use in the traditional sense (hotel and guesthouse) with a few 'holiday let' / 'holiday flat' applications also identified as 'C1'. There is only 1 lodge site. Thus, the extensive occurrence of small holiday let applications that characterises the surrounding RDC planning environment is not evidenced within the Hastings planning history.[58]

7.32 In the period 2020-2022 the new Premier Inn site and the new Havelock Road (University of Brighton / VIVE) site cumulatively provided a significant net gain to overall stock. Whilst in the period 2024-2025 there is a large effective reduction in stock via the changes of use for the VIVE and Chatsworth hotels although the latter site is now subject to a new application.

7.33 Considering the loss at VIVE, HS/FA/24/00302 introduces a variable homeless accommodation use (to the already variable C1 and student accommodation use) due to viability issues. Therefore, the recent technical losses do require a degree of qualification and context and represent isolated 'one-off' cases. At the time of writing the VIVE hotel is in administration and represents a loss of 97 rooms. During the post-COVID downturn, a small number of guesthouses were lost to C3 and HMO use but only 2 of these were truly active guesthouse sites.

[58] There is a possibility that the absence of data relates to how the LPA consider short term lets (for example, if they consider them 'C3', then a flat being let as short term let may not require a change of use).

7.34 Considering the application of policy, the delegated reports typically consider E4, as well as the priority areas for visitor accommodation and the viability criteria of the SPD. Breaches of visitor accommodation policy may be considered as an aspect within the overall planning balance, rather than an insurmountable obstacle to approval. Thus, applications not meeting the criteria have been approved on the basis of benefits outweighing the harm. For example, the Millifont Guesthouse (HS/FA/22/00800) was refused due to conflicts with E4 and the SPD and a poor standard of accommodation. However, the subsequent application featured improved rooms lead to approval of the application. (NB. At the time of writing, the property does not appear to be trading and web listings show a fictitious grading sign, passing off as a VisitEngland star rating, on the property's exterior).

7.35 Referenced in some approvals is Para 128a, supporting the conversion of retail and employment sites to residential. For some applications it has simply been accepted that the use has in fact been residential / HMO for many years (HS/FA/22/00399, HS/FA/23/00002). For HS/FA/22/00195 it was noted that the viability criteria were met and the site is not within a priority visitor accommodation area. The only refused gain related to multiple applications for a chalet site with surface water issues.

Rother

7.36 This section provides an overview of existing visitor and tourism related planning policy with associated Appendices in support. Following the policy overview, an analysis is made of recent planning history (application 'churn') relating to visitor accommodation to understand the general patterns of approval/refusal over time, the distribution of applications as regards the areas prioritised for visitor accommodation and how decision-makers have been applying the relevant policies.

Planning Policy Overview

7.37 The policies and supporting text can be viewed in full in the Core Strategy (2014) and Development and Site Allocations Local Plan (2019).

- Core Strategy Policy EC6: Tourism Activities and Facilities. This policy encourages proposals relating to tourism activities and facilities where they accord with considerations including *(iv) it does not involve the loss of tourism accommodation, unless there is no prospect of its continued use*.
- Rother Development and Site Allocations (DaSA) Local Plan Policy DEC2:Holiday Sites. This policy governs all proposals for camping, caravan and purpose-built holiday accommodation setting out

- Rother Development and Site Allocations (DaSA) Local Plan Policy DEC3: Existing Employment Sites and Premises. This strategic policy supersedes Core Strategy Policy EC3. It seeks to secure effective use of existing employment sites by: (i) retaining land and premises currently (or last) in employment, including tourism use, in such use unless it is demonstrated that there is no reasonable prospect of its continued use for employment purposes or it would cause serious harm to local amenities.
- Policy DCO1: Retention of Sites of Social or Economic Value. This policy sets out requirements and evidence that proposals that involve the loss or diminution of sites of social or economic value (including tourism use) must meet and submit, in order to demonstrate there is no reasonable prospect of a continued use.

7.38 The loss of tourism accommodation is contrary to strategic policies EC6 (iv) of the Core Strategy and DEC3 of the DaSA Local Plan. As per policy DEC3 (i), sites should be retained in employment/ tourism use "unless it is demonstrated that there is no reasonable prospect of its continued use for employment purposes or it would cause serious harm to local amenities".

7.39 As noted at the last paragraph of Policy DEC3, the approach to demonstrating "no reasonable prospect of continued use for employment purposes" is set out in Policy DCO1 of the DaSA, which requires:

(i) *evidence of a comprehensive and sustained marketing campaign which clearly indicates a lack of demand for the existing use (or as an alternative commercial or community facility, where appropriate) based on marketing, normally at least 18 months, that offers the land or unit/s for sale, or rental, at a realistic valuation of the site/premises for that use; and*

(ii) *evidence that clearly demonstrates that the unit is not or is not capable of being financially viable, including alternative commercial or community facilities, where appropriate.*

7.40 Therefore, to support a planning application to change the use of existing tourist accommodation, information and evidence of the marketing and other measures are required, together with detailed evidence that the unit is not capable of being financially viable. Once submitted, this information should be subject to independent viability testing. Further information on the requirements of Policy DCO1 is set out in paragraphs 3.6 – 3.8 of the DaSA Local Plan:

3.6 To satisfy the policy test regarding whether there is a reasonable prospect of continued use, marketing will normally be required. A comprehensive, sustained campaign must be undertaken, offering the premises for sale or for rent, at a realistic valuation of the premises for the permitted use. Ordinarily, the marketing campaign should run for a period of at least 18 months before the planning application is submitted; the premises should be offered for sale locally and regionally, in appropriate publications including through appropriate trade agents. Details should accompany relevant planning applications, including a minimum of two independent valuations of the building in its current condition/state.

3.7 Sites should be advertised with the option of an alternative commercial or community facility, or restaurant or other use falling within the 'A' or 'C1' use classes, appropriate to the site and in line with other policies in the Local Plan. Where applications relate to a public house, the property should be advertised free of tie and restrictive covenant. Applications should also have full regard to the provisions set out in the CAMRA Public House Viability Test.

3.8 In terms of financial viability evidence, the Council will require submission of trading accounts, normally for the last three full years in which the business was operating on a full-time basis. In schemes affecting tourism accommodation, consideration will also be given to the adequacy of marketing measures to attract holiday lettings. Where an applicant wishes to make a case that a site is not, or is not capable of being, financially viable, evidence should demonstrate the viability of alternative commercial or community facilities, where appropriate. The Council would normally obtain independent verification of the viability evidence submitted, to be undertaken at the developer's expense. Applications should also be accompanied with supporting information to demonstrate how the applicant has brought forward measures to improve viability of the business over the short/medium/long-term. The Council's National and Local List of Planning Application Requirements expands on the evidence to be supplied in support of a proposal under this policy.

Neighbourhood Plans

7.41 The Battle Neighbourhood Plan was adopted in October 2021 and references the Core Strategy and DaSA including Policy BA1 Battle. It includes Policy HD8 *Town Centre Boundary* which seeks to provide facilities for visitors and to retain and enhance existing businesses within a defined town centre area.

7.42 The Rye Neighbourhood Plan was adopted in July 2019 and references the Core Strategy and DaSA including Policy RY1 Rye.

- The associated policy mapping defines a Town Centre Boundary. Policy B2 *Supporting Rye as a Visitor Destination* a) seeks to enhance the Town Centre Area and the surrounding Blue' and 'Yellow' Zones. B2c) specifically supports visitor accommodation.
- Policy B1 Employment and Business Development seeks to safeguard employment space within the NP area generally. B1 includes viability criteria for the loss of employment space, including evidence of marketing and non-viability of repositioning.
- The Rye NP is currently being reviewed and has been subject to early consultation.

Planning Impacts Overview ('churn')

7.43 To assess churn, 224 visitor related applications covering a five year period were reviewed. Appendix IIC presents a summary data whilst Appendix IID presents an annotated version of the same plot. Appendices IIE and IIF present the geographic distribution of the applications. Noting the separate policy for camping/ caravan / lodge accommodation within the Local Plan, symbology has been used on the plots to indicate applications relating to such accommodation types.

7.44 The nature and scale of visitor accommodation in Rother is quite different from Hastings. Rother is characterised by a very large number of small gains. The majority of the applications were for single holiday lets with only a small number refused. A proportion of the approved small gains are titled as unit-types that might be considered within the camping/glamping market, e.g. 'lodges' and 'shepherds huts'. However, a large number are simply for 'holiday lets'.

7.45 Referring to Appendices IIE and IIF, it can be seen that the 'smaller' (1-4 room/unit) applications are dispersed across the study area and are largely located in rural areas away from the town centres and outside of development boundaries. The data indicate that these comprise a mixture of new units and conversion of existing outbuildings (garages, barns) and residential annexes. The rate of new smaller applications was especially intense in the period immediately after Covid. Applications have slowed since that time.

7.46 The larger approved gains (7+) mainly relate to the extension of existing camping / caravan/ lodge sites or establishing of new camping sites (see for example

RR/2021/2752/P and RR/2021/102/P. However, some proposed new camping sites have been refused, including due to harm to the National Landscape (e.g. RR/2023/217/P, RR/2021/501/P) and highways concerns (RR/2021/1138/P). Other larger approved gains include the conversions of C2 (boarding school and student accommodation) sites at Guestling (RR/2021/2766/P, RR/2020/176/P) and a recent hotel extensions in Rye (RR/2024/1743/P, RR/2024/285/P).

7.47 The number of proposed losses is much smaller in comparison to the proposed gains. These are sparsely scattered across the timeline, though a loosely-defined cluster is seen during and after the latter stages of the pandemic (2021-2022). The vast majority of the proposed losses were for the conversion of smaller sites (1-7 rooms) to C3 with most of these refused. Thus, the existing policies have demonstrated effectiveness for the retention of visitor accommodation although resubmissions with additional information has secured approvals.

7.48 Para 11d) and the 'tilted balance' has been referenced in many recent decisions. However, in contrast with HBC, RDC have generally concluded that the loss of visitor accommodation is a significant harm that outweighs the presumption in favour (e.g. RR/2024/1936/P, RR/2024/577/P, RR/2023/183/P). Where these decisions have been appealed, the Inspector has generally concurred with the Local Planning Authority (LPA). The only relevant allowed appeal is for RR/2023/1111/P, wherein the Inspector did cite Para 11 d) but also acknowledged that in this specific instance there was in fact minimal benefit and minimal harm, with the application relating to a single room at a rural site.

7.49 A few refusals for conversion to C3 do additionally identify policy conflicts relating to the creation of isolated homes in the countryside. There are some notable recent refusals for the conversion of larger holiday park-home sites to residential use (RR/2023/1582/P (and RR/2024/1235/P at the same site) and RR/2024/2065/P). The refusal decisions have again referenced conflicts with EC6, insufficient evidence regarding the criteria of DCO1, and sufficient harm to outweigh the tilted balance.

7.50 One-off approved losses are RR/2019/2289/P (pub+C1 to E/C3), where officers recommended refusal but Committee considered there would be benefits, and RR/2024/1340/P (C1 to C2 boarding school), where the viability criteria were met.

7.51 Considering the main town areas, it can be seen from Appendix IIE that each has a differing planning history, although it should be noted that many existing dwellings that are used for tourist accommodation will not normally need planning permission:

- Bexhill has a central concentration of small to moderate losses and is unique amongst the towns for its lack of gains and a clear net loss.
- Rye has a broadly positive history with a spread of small to moderate gains and losses and a net gain overall.
- Battle has virtually no history within the development boundary – applications in and around the town are all for small gains only with many refused.
- Compared to HBC, Rother also has its own pattern, with a central concentration of moderate-to-large gains balanced by moderate-to-large losses.

Viability Criteria

7.52 To provide some broader context, a comparison has been made with the viability assessment process and requirements for three other LPAs on the south coast, two of which are urban LPAs, with comparable visitor offers ('LPA A', 'LPA B' and 'LPA C'). The findings are summarised in Table 8 below. The overall considerations are broadly equivalent for each LPA and the range of timespans for the evidence requirements are generally not too dissimilar. However, there are important differences.

7.53 LPA A and LPA B have specifically delineated policy zones for Tourist Accommodation Areas (TAAs). Such a position provides a clear starting point, for example, for the possible future definition of an Article 4 area. Whilst HBC and RDC do identify priority areas and centres, these perhaps lack the definitive boundaries of a designated TAA. They are also relatively broad areas that would likely require future refinement (based on a detailed current database) in order to meet the Article 4 requirement to '*apply to the smallest geographical area possible'* (Para 54 c).

7.54 Within the TAAs, a need has been identified to prevent the loss of visitor accommodation to 'incompatible' uses, particularly HMOs, which it is considered would have a detrimental impact on the remaining TAA. The concept of setting a harmful precedent is also considered. It can further be noted that the TAA for LPA A has been subdivided to reflect a strategy for protecting the highest quality stock in the primary area (via stringent criteria) whilst providing a mechanism for managed loss of lower quality stock in the secondary area (via less onerous criteria). This contrasts with HBC, where viability criteria differ based on the size of the site, as opposed to its location.

7.55 Regarding the specific measures for viability, RDC appears well-aligned with the comparison LPAs. HBC differs a little, with less specific evidence requirements for business performance but a greater evidence requirement for business promotion.

7.56 Other features seen for the comparison LPAs (but not HBC or RDC) include an initial screening service for proposals involving visitor accommodation and an expert panel to review full applications. These LPAs also specifically identify that applications involving 'lifestyle' businesses may warrant special consideration.

Table 7 – Comparison of policy context and viability criteria for HBC, RDC and selected relevant LPAs.

	HASTINGS		ROTHER	COMPARISON LPA A		COMPARISON LPA B	COMPARISON LPA C
POLICY & ASSESSMENT CONTEXT							
Policy adoption date	Dec 2015 (SPD)		Dec 2019	Feb 2017 (SPD)		Mar 2016	Apr 2016 (SPD)
Dedicated Tourist Accom. SPD	Y			Y			Y
Delineated Tourist Accom. policy zone	(Priority areas stated)		(Priority Centres identified)	Y		Y	
Expert review panel				Y			Y
Initial screening service							Y
VIABILITY CRITERIA	4+ rooms	1-3 rooms	LPA wide	Primary zone	Secondary zone	Within TAA	LPA wide
Evidence of marketing for sale	24 months	12 months	18 months	24 months	12 months	12 months	18 months
Evidence of performance & costs	'annual plan'	Y	36 months	36 months	36 months	18 months	36 months
Evidence of prohibitive repair costs	Y			Y			Y
Evidence of investment to improve viability	(if applicable)		Y	Y			(if applicable)
Evidence of business promotion	36 months	Y?	12 months	12 months	12 months	18 months	12 months
Evidence of business plans	Y			Y		Y	Y
Evidence repositioning is not viable	Y	Y	Y	Y		Y	Y
Evidence character of location has changed	Y	Y					
No recent approvals for repositioning							Y
Independent expert opinion			Y	Y			
Flexibility for lifestyle businesses				Y		Y	Y
RESTRICTIONS ON PROPOSALS							
Use must be compatible with area				Y (no HMOs)		Y	Y (no HMOs)
Must not set a precedent						Y	

8. Future Development Opportunities

Potential for Investment in the development and upgrading of existing hotels and other accommodation establishments

8.1 The survey of accommodation providers (sample 45 businesses) undertaken as part of this review indicated a dynamic sector of mainly micro-businesses, where over the last five years:

- 15% of properties have changed ownership;
- Planning permission has been sought for 20% of the properties (i.e. 9) with 6 successful and 3 unsuccessful – mostly small scale alterations up to £50,000 with 15% over £100,000;
- More rooms have been added than have been lost but generally these are small refurbishments reflecting the micro-business nature of the sample i.e.:
    - 3 to 5 rooms added for around half of hotels surveyed.
    - 1-2 rooms added for a third of B&Bs and same for self-catering departments.
    - 3-10 units / pitches added by 25% of sample.
- Some type of capital investment has been undertaken by 60% of providers in the last 5 years.
- Forward Plans – 60% have no current development plans, possibly reflecting the difficult trading context, 11% wish to expand and 9% intend to close.

8.2 As far as markets go, accommodation providers' broad forward view is that there are local and national domestic leisure market opportunities as well as overseas markets and the sustainability niche within both domestic and inbound markets as a subset. This reflects the current make-up of the offer. Broader economic plans to diversify the economy will also help to grow business-related tourism which is closely related to the health of the wider economy.

8.3 Wider constraints relating to skills and infrastructure, such as transport in parts of Rother, may impede development opportunities as it is often hard for employees to get to jobs in rural areas particularly in anti-social hours. This is compounded by fewer hospitality courses and reduced pipeline of graduates and trainees as well as higher costs of employment, as a result of the Budgets in 2024 and 2025.

8.4 Hastings has some traditional and dated product which may be supported to change use, potentially to residential. Many of the towns within the study area are not seen as a desirable destination to invest in new accommodation provision of any scale given relatively low occupancy so there would be benefit in further preparatory work to understand the site opportunities and the ways in which development funding might be attracted. Hotel investment is a specialist area which does not attract the High Street banks with loan finance harder to secure than with other sectors such as retail. As a result investors need to arrange funding from debt funders which costs a lot more than traditional borrowing. The level of corporate activity is lower in Bexhill or Hastings than in somewhere like Brighton where the occupancy rate is over 75% and so can more easily attract branded and commercial accommodation providers.

8.5 The region is under-represented with branded products – Blackpool has for example a Hampton By Hilton and a Holiday Inn – which will have attracted demand from the less favourable hotels, in addition to hotel loyalty programme clients. The central Premier Inn in central Hastings is a major coup, using local authority land assets, and is likely to be a catalyst to raise the quality of some properties in the town.

8.6 There is a lack of hotel rooms, especially for business travellers and event attendees and major employers such as Hastings Direct reportedly struggle to accommodate visiting staff/clients. The shortage of accommodation makes things more challenging as providers are not keen to take the risk in setting up new accommodation.

Potential for growth or reduction in demand for Accommodation in the two Administrative Areas

8.7 Subject to consumer confidence returning, the broader market trends are favourable for both Rother and Hastings and this can support medium term change. In Rother this potentially includes smaller boutique hotels and aparthotels in Bexhill as well as Hastings. There is a good quality traditional offer which is thriving, such as Dunselma, which-scores a perfect 100% on the Tripadvisor measure with all reviews received either ‘Excellent’ or ‘Good’. There needs to be more effort in supporting these sorts of businesses to start up with stringent standards and the support available where they also need help, in this example there is potentially more to be done on accessibility. Curating a collection of these types of smaller contemporary serviced and non-serviced businesses operating to very high standards can then help the repositioning the entire strip of the coastal zone.

8.8 While the tourism market outlook is broadly positive for both administrative areas, there are potential headwinds in both economic and policy terms. Continued pressures on consumers largely relating to the cost of living crisis are likely to last into 2027 while new policies, such as a visitor levy for areas within Mayoral and Combined Authorities, may influence demand over the longer term.

8.9 In rural Rother, the nature of the county combined with current planning policy means that most of the development being brought forward is likely to be modest in scale with smaller businesses developing new or existing accommodation, particularly using existing land for camping, glamping and self-catering facilities. Existing businesses, particularly farms, vineyards and current accommodation providers will provide the basis for continued growth and expansion. In rural Rother there will be particular sites that will interest serviced accommodation providers, but these sites are likely to be more suitable for independent brands that have developed an offer based around boutique or country house accommodation with new investment often targeting the refurbishment of existing properties. These are by nature highly site specific.

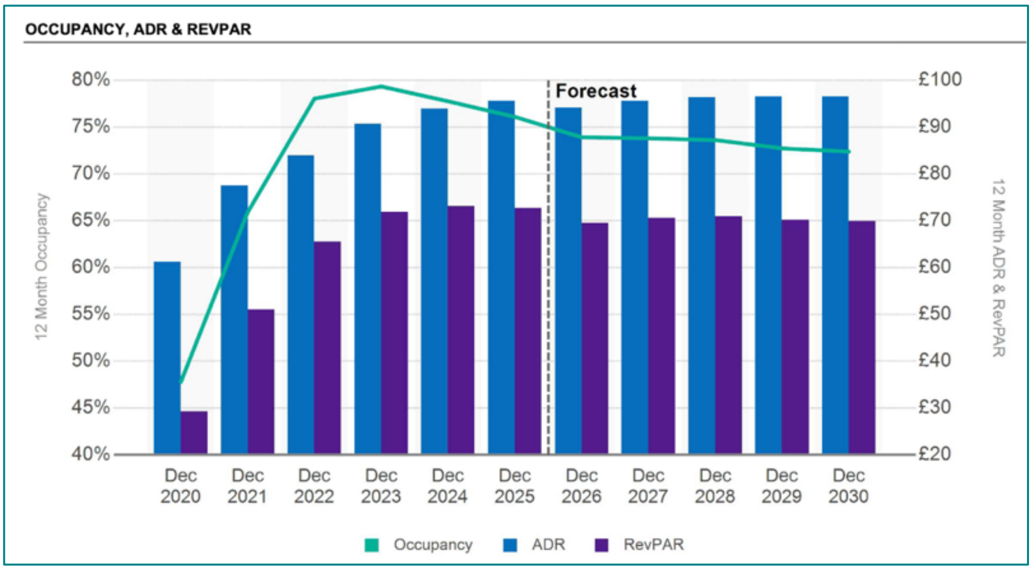
8.10 The principal budget hotel brands, notably Premier Inn and Travelodge, continue to look for development opportunities where there is a limited presence of that type of offer. Rye for example is such an area with potentially brownfield sites and development opportunities of existing hotels, such as the River Haven Hotel recently on the market. The issue often with such properties is a more limited catchment, a small size in terms of rooms combined with an existing, often lifestyle, accommodation base which may make such areas less appealing for the branded operators. There may however be sites on the principal transport corridors or near business parks where budget hotels could be attracted.

8.11 In Hastings and Rother's coastal area including Bexhill there may well be sites that appeal to specialist accommodation operators but current occupancy and an over-supply of legacy accommodation may reduce the viability of new accommodation-related investment. Typically an occupancy rate of 75% will indicate undersupply and create interest in the market. Overall occupancy across the Sussex Region sees occupancy forecast to decline from above 75% to 72% over the next 4 years as Figure 4 below shows.[59]

8.12 Occupancy is currently estimated at between 55 and 65% in the coastal zone across both administrative areas making new investment more challenging. Current policies on change of use to residential can be used to encourage traditional (retiring) operators of B&Bs to exit the market.

[59] CoStar (2026) Hospitality Submarket Report for Sussex Regional – East Sussex, Surrey, West Sussex

Figure 5 – Sussex Regional Occupancy, Average Day rate and Revenue per Available Room



8.13 Across the Sussex Region there were just two developments underway in November 2025 adding 127 rooms to the construction pipeline, including a new 116 room Premier Inn in Bognor Regis and a pub refurbishment near Arundel adding 11 rooms. The sale of Jeake's House Hotel, an 11 room property in Mermaid Street Rye for £1.9m marks the most significant sale in 2025 across the region. Current town centre policy in places like Battle is likely to limit the availability of suitable brownfield sites.

8.14 This level of development and churn is indicative of a limited regional market where transaction volumes are currently low, not helped by an unhelpful economic backdrop and traditional lenders who are averse to supporting hotel development. The site requirements of different brands and accommodation investors are likely to be specific and not necessarily geographically bound. Given the diversity of accommodation types and investors' specific requirements it is unlikely to be possible to identify areas of the two administrative areas suitable for different types of accommodation development. However, and in Rother's case, the identification of existing commercial and mixed use development sites outlined in the Part 4 Site Allocations could extend to visitor accommodation provision, which would be a helpful appendix in the preparation of any Supplementary Planning Guidance - a core recommendation set out below.

Attracting inward accommodation investment

8.15 Investors are big believers in having a good local tourist office, inward investment department and economic regeneration offer that is active and positively promotes the area, attracts investment and works closely with the investors across the wider area. The Councils should look to make it as easy possible to invest and reduce the barriers to entry, often in the context of regeneration schemes. Good examples of when councils work with businesses include Brighton, Margate, Folkestone who have had significant investment from Cornerstone. Torbay and Plymouth are also good examples.

8.16 A new event venue can create uplift as it gives people a reason to visit. Currently Hastings has a strong events programme but limited accommodation suitable for hosting corporate meetings and conferences. Engagement and a collaborative approach from different elements of the council, working closely with the private sector can unlock investment potential in the area. Both councils could benefit from an approach where businesses are more closely connected to developing a new common vision. Currently this may not happen to the extent required and some of the private sector have reported a lack of public / private sector engagement.

Managing Future Growth with Tourism Focus Areas

8.17 Both authorities have significant tourism economies that are likely to grow over the next two decades. There is a need for supportive planning polices to allow for new accommodation formats, and to facilitate development that modernises the current visitor economy, particularly in those areas where the industry is strategically important in terms of jobs, income and potential.

8.18 Some 50% of all visitor accommodation across the two Council areas, whether that be the professional sector or that offered by short term lets, is contained in six areas. These highly visited destinations form the bulk of the growth opportunity and will benefit from proactive planning and management.

8.19 The concept of Tourism Focus Areas recognises that businesses, residents and wider civil society need to have the opportunity to properly plan for new tourism developments which also reflects a complex policy environment and different types of landscapes. The designation of a Tourism Focus Area would support the development of a Management Plan for each area that could identify and agree:

- The overall need for new accommodation over the period of the Local Plan;
- Zones and sites suitable for new accommodation and other visitor attractions;
- Support for small visitor economy businesses in the area;

8.20 Focus areas in Hastings could include:

- Central St. Leonards and potentially Gensing ward
- Castle and Old Hastings (western part of ward)

8.21 The ideal mix of accommodation in the Hastings context to be supported will include:

Serviced Accommodation

- C1 Leisure and Business Hotels
- C1 Aparthotels
- Boutique Bed and Breakfast

Non-Serviced Accommodation

- C1 Self Catering Accommodation
- Hybrid formats (accommodation that melds some serviced elements with a largely self-catered offer)
- Holiday Parks and Camping / Caravan Sites
- Short-term lets - within the principal tourism areas

8.22 There is likely to be less need for traditional bed and breakfast properties and lower quality hotels and subject to modified viability tests it may be appropriate to allow change of use of such properties, particularly for smaller establishments.

8.23 The following highly visited destinations in Rother could benefit from becoming Tourism Focus Areas:

- Rye and Winchelsea: including Rye town, Rye harbour and Winchelsea
- Eastern Rother: With a focus on Camber
- Bexhill: Central and Sackville wards
- Battle: with a focus on both the town and the surrounding area

8.24 For areas like Rye and Camber parishes, a change to current planning policy to restrict the occupation of new dwellings to primary residences may now be justified, given the high levels of holiday accommodation identified in Appendix 1C. This shows that 36% of accommodation in Camber may be used solely for holiday purposes. Such a policy could be implemented by a condition or planning obligation attached to a relevant planning permission. Such a policy for example has been developed in Northumberland where Local Plan Policy HOU 10 restricts new homes to only being occupied as a 'principal residence' in areas where 20% or more of household spaces have no usual resident.[60]

8.25 The ideal mix of accommodation in Rother to be supported, which will vary between the four areas, will include:

Serviced Accommodation

- C1 Leisure, Country House and Townhouse Hotels

[60] Northumberland County Council (2022) Northumberland Local Plan – Policy HOU 10 Second and Holiday Homes in Northumberland Census 2021. Available from this link

- C1 Aparthotels
- Boutique Bed & Breakfast

Non-Serviced Accommodation

- C1 Self Catering Accommodation
- Hybrid formats (accommodation that melds serviced elements with a largely self-catered offer)
- Short-term lets
- Caravan, camping and glamping accommodation
- Regeneration of the Holiday Park (Camber)

8.26 See Appendix VII for more details of the locations that could benefit from a Tourism Focus Area.

Conclusions & Recommendations

Conclusions

There is a Supportive Policy Context

9.1 There is a significant visitor economy in both Rother and Hastings and it has further potential to create growth and jobs. This is recognised through the Economic Development and Tourism targets in Rother Council's Plan, Pride in Place and in the Hastings Town Deal programme, which has at its heart the need to support businesses to invest, innovate and grow.

9.2 The Sussex LVEP's ambitious strategy is to increase:

- the number of staying visitors, both from the UK and from overseas;
- the amount these visitors spend each night: and,
- the time they stay in Sussex.
- new and refurbished accommodation is central to the successful delivery of this strategy. [61]

9.3 Regeneration Plans for both Rother and Hastings under the Pride in Place Programme aim to improve places and town centres, create better connectivity and empower communities. These plans will improve the experience for visitors, including investment in the public realm, greening streets, easier walking and cycling, and developing heritage and culture assets. The Pride in Place plans offer momentum and funding to make positive change which can improve the experience of visitors as well as residents. Alongside physical improvements, Pride in Place investment will support the organisations and groups that deliver festivals, fairs, community events, cultural activities, and attractions throughout the year. This will enhance the visitor experience by providing a richer programme of activities and opportunities for people to engage with the area's heritage, culture, creativity, and community life.

9.4 The strategies mentioned in paragraph 9.1 above rightly identify two core missions *to Support businesses to invest, innovate and grow* and *Create sustainable places and communities*. Both these areas are critical to the visitor economy in general and the accommodation sector in particular. They also meet head-on the evident need given that business start-up levels are relatively lower along the Hastings / Bexhill coastal strip than in many other English resorts.

[61] Visitor Economy Strategy for Growth 2024 – 2034 East Sussex, Brighton and West Sussex Local Visitor Economy Partnership – pages 7 and 17

9.5 This supportive policy context, in addition to any new Local Plan policies, provides a strong basis for development of the visitor economy.

Accommodation Trends in Rother and Hastings largely mirror the National Picture

9.6 The accommodation sector has gone through significant change over the last decade with the amount of serviced accommodation reducing significantly and being replaced by non-serviced formats usually self-catering and often being promoted via new channels such as Airbnb and Booking.com.

9.7 Demand for coastal holiday accommodation, particularly serviced stock and, within this category, traditional Bed & Breakfasts, has reduced leading to a reduction in both establishments and room numbers in both authorities.

9.8 This shift has been facilitated by the online channels but is reflecting on, and has been driven by, longer term consumer trends for less formality, more space for families and independence. While many more nights are still spent in hotels, the appeal for visitors towards self-catering products is likely to continue.

The Short-term Economic Context is unhelpful

9.9 Cost of living increases continue to weigh on consumers with additional costs of operation imposed on the sector by government over the past 18 months. However, the indicators are that at least in development terms the worst is over, where accommodation is a relatively favoured but specialist commercial sector. There needs to be an increase in business confidence in order for investment to flow. A variety of new Government initiatives including a summer 2026 VAT reduction for family attractions and hospitality businesses; a major marketing campaign for coastal destinations; and help on business rates for pubs, clubs and live music venues from April 2027 will all help.

But there is a Longer Term Potential for Growth

9.10 Notwithstanding the point above, visitor trends also play to Rother and Hastings strengths, whether that be a desire for authentic stays in the countryside, back to nature glamping, wellness experiences, vineyard tours or attracting an older market that is increasingly interested in a revitalised offer in the resorts. A range of wider factors is already starting to show promise. While climate change is an existential threat for future generations, it may offer a partial dividend for south coast resorts by providing an alternative to the new normal of very high summer heat in Southern

Europe. [62] Working from home trends gives a longer term opportunity for the area to build back its place as a centre for new residents seeking an 'at home staycation' and new tourism experiences offered as a result.

9.11 In its report, the Airbnb Task and Finish Group [63] which related to Rother, noted the value of encouraging tourists to stay longer than one or two nights and recommended further research. Staying visitors are inherently more valuable than day visitors, often spending 5 to 7 times more. The value of the sector can undoubtedly be increased by a focus on and support for new and refurbished accommodation.

Planning Policy can do more to realise the Potential of the Visitor Economy

9.12 A review of planning applications for visitor accommodation indicated a supportive environment with the majority of applications being approved – Appendix IIE. A generally low number of applications suggests that current economic conditions may be preventing development. Businesses however see opportunities in both overseas and domestic markets and are optimistic that niche markets such as ecotourism and initiatives like the Rother Wine triangle can also grow visitor numbers. As the economy starts to rebound, both Councils can play an important proactive role in supporting new accommodation development underpinned by clear planning policies in support. However we consider that this is best undertaken within a strategic framework that identifies key opportunity areas – identified in Section 8 as Tourism Focus Areas.

More work is needed on Short Term Lets

9.13 The Rother Airbnb Task and Finish Group noted the need for more evidence in order to be able to develop and adopt any new planning policies related to Short term lets. This report provides estimates of the number and type of STL use across both authorities and a further recommendation is made as regards the next steps below. It is clear that many property owners have also been unclear about the planning obligations when it comes to potential change of use and so better information for

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[62] European Travel Commission (2024) Monitoring Sentiment for Intra-European Travel – Changes to travel behaviour due to evolving climate with a third of sample reportedly avoiding destinations where temperatures might reach extreme levels, opting instead for locations with more stable weather conditions. Travellers above the age of 55 are particularly determined to avoid the heat. More recent ETC research published in July 2026 found that 76% of European travellers said climate-related factors affected their behaviour, with 16% actively looking for destinations with milder temperatures and 15% avoiding extreme heat. Tour operators, such as Intrepid Tours, have developed 'coolcation' destinations in Northern Europe particularly for older markets.

[63] Report of the Airbnb Task and Finish Group (June 2025) to the Overview and Scrutiny Committee Rother District Council, covering the wards of Eastern Rother and Rye & Winchelsea.

property owners would likely be beneficial going forward, also reiterated by the Task and Finish Group.

9.14 Emerging Local Plans include policy mechanisms to safeguard housing stock. Proposed Rother Policy HOU13, for example, introduces a primary residence restriction for new dwellings within the countryside while Hastings proposed policy E5 resists visitor accommodation gains that would result in the loss of a dwelling. These measures, similar to those put in place in Northumberland in 2022, are advised to assist in moderating further STL growth in those areas where STLs make up a higher percentage of dwellings, with the percentage threshold to be further considered.

Planning Policies for Visitor Accommodation have generally worked in the manner intended

9.15 A review of planning applications in Hastings has shown that:

- The patterns of overall gain/loss have been driven by a few larger sites with the main gains significant, whilst losses have been modest.
- Policy is consistently used, although sometimes outweighed in the overall planning balance.
- A number of properties that have been subject to applications have been of a low standard.

9.16 A review of planning applications in Rother has shown that:

- The existing policies and viability criteria appear to have been an effective mechanism for preventing or managing the loss of visitor accommodation.
- Decision takers (LPA and Inspectorate) have routinely identified EC6, DEC3 and DC01 as relevant and applied the criteria in their decision making.
- Losses have only been permitted where non-viability has been demonstrated and/or an appropriate community use has been proposed.

Recommendations

9.17 The 20 recommendations for consideration are set out under five themes. They see the full retention of the principal policies in the draft Regulation 18 document but suggest some additions that will help realise the undeniable potential.

As part of a new Tourism Strategy, consider the establishment of Tourism Focus Areas

9.18 Rother is a large district with many accommodation businesses dispersed across its area. Hastings borough is smaller but also has concentrations of visitor accommodation over a relatively small number of wards. In summary, over 50% of visitor accommodation is found in six core areas (see Appendix VII).

1. Businesses, residents and stakeholders should be able to have a say in what visitor accommodation is developed and many related businesses would also benefit from further support. A defined Tourism Focus Area (TFA) can support local and agreed development needs and reflect current local policies in place, including Neighbourhood Plans.
2. The TFA designation is voluntary but once agreed will be used to aid tourism planning. It does not necessarily mean further development, that will depend on the local context, with priorities in some areas, like Camber potentially being more about the better management of existing accommodation rather than an increase in rooms.
3. Each agreed TFA can be supported to draw up a Management Plan to be approved by the Council, tourism businesses, any Neighbourhood Forum and other interests. A new tourism strategy can support the development of TFAs in areas where there is a high level of existing tourism and where demand is projected to grow over the Local Plan period. TFAs can set a trajectory for future accommodation growth, agree to maintain existing levels of accommodation or reduce the number of rooms as appropriate. TFA's should agree the broad mix of accommodation types that represents the ideal for the local area, drawing on this accommodation study, local planning documents and other relevant information.
4. TFAs could also encompass other elements of the visitor economy, such as visitor attractions for example, and identify issues that impede the development of the wider sector or create management challenges that need resolution.

Continue to build knowledge of the STL sector and develop related support

5. Continue to build the short-term lettings evidence base, identify the key operators in the sharing economy and prepare for the roll-out of the new statutory registration scheme.
6. Signpost STL operators to online guidance such as the Pink Book showing their obligations in both planning terms and compliance requirements.[64] This would include advice on business rates such as the six-bed rule for B&Bs and the 140 night rule for self-catering accommodation.
7. Encourage traditional B&Bs wishing to become self-catering short-term lets to apply for change of use potentially to Sui Generis use-class as part of the planning process. Draw on the screening criteria in Appendix III to assess whether applicants should be invited to submit a planning application.
8. In the event of the introduction of a use class C5 and associated Permitted Development Right, areas which already have a high numbers of STLs could subsequently consider removing these rights via an Article 4 Direction. Such an eventuality could be referenced in any TFA Management Plans and if so should consider the scale of short-term lets and wider housing supply issues.
9. Both Councils may wish to consider post-development occupation monitoring surveys to establish vacancy rates and the use of new developments as non-primary residences. This would support the introduction of a policy that restricts any new homes to being only occupied as principal residences. [65]
10. Consider events to attract the larger STL operators and the 28 agencies who are actively selling the area in a professional capacity.

Facilitate the development of new accommodation formats

9.19 Hotels and other places to stay bring more employment and income to the area than other parts of the visitor economy so the total value of the sector can be significantly increased by supporting new or upgraded accommodation. Draft Policy E6 for example in Hastings recognises the growing importance of holiday park and camping accommodation and seeks to mitigate visual impact and maintain seasonal use. The policy is positive in that it sees the possibility of upgrading and expansion of sites, subject to the meeting of a range of criteria.

11. Planning terminology and phrasing can be challenging for non-specialist audiences, including potential investors and operators. A range of materials designed to make the planning system more accessible is likely to help

[64] VisitBritain / England Business Advice Hub / The Pink Book
[65] Recommendation made originally in the Rother & Hastings HEDNA Update – Strategic Planning Research Unit - DLP Planning Ltd with Edge Analytics Ltd February 2024 and further developed in the draft Rother Local Plan.

smaller developers with often limited means to navigate the landscape and develop proposals. It is recommended that the Councils consider updating existing resources, such as Rother District Council's Accommodation Start up Pack, and consolidate all relevant information into a web based resource and potentially develop visitor accommodation site allocations to inform developers about the locations that are available for new developments.

12. The development of new accommodation formats can be facilitated through specific information, guidance and advice. Consider ways to make it easier for developers and accommodation businesses to understand the potential of visitor accommodation via an advisory service, specialist support or pre-application process that is designed for the sector. Build the level of expertise and resources to support new accommodation businesses and prioritise accommodation concepts which will extend the season, such as high specification self-catering facilities, accommodation as part of vineyards and themes that promote wellness and inclusion. In Hastings there is likely to be scope for encouraging accommodation that is fully sustainable, with the objective to provide a range of eco-tourism options for visitors, that can also help to reposition the town's offer.
13. Recognise in policy that a lot of visitor accommodation is in secluded or rural areas which may give the opportunity for better performance on e.g. biodiversity but is potentially less able to offer e.g. a range of means of transport. Where possible encourage charging points to reduce emissions where the only travel option is the private car.

Changing the use of Visitor Accommodation to Residential or other uses

14. The comparator authorities reviewed on page 62 all gave some flexibility when dealing with smaller lifestyle businesses to exit the market. The examples give flexibility for such businesses and at times this could be appropriate in both Hastings and Rother given a number of traditional businesses with owners likely to be reaching retirement.[66] Ultimately such a policy may serve to reduce supply and so increase overall productivity as well as providing a modest increase in residential dwellings.
15. There is still some relatively low quality stock that receives poor reviews in both areas, particularly on the coast. Current planning policy seeks significant amounts of evidence that properties are not commercially viable before allowing change of use and it may be helpful to review the various criteria,

[66] In general, the bar to exit the market should be lower for smaller B&Bs with e.g. five or fewer rooms. Such a threshold would equate to 28% of the B&B stock in Hastings but 78% in Rother, which would support a different threshold operating in each area.

particularly applying to smaller properties with five or fewer bedrooms. A range of quality measures for hotels which are clearly under-performing, in addition to viability measures, could be a helpful complement to inform the change of use of properties no longer suited to the visitor market. This could include assessment including independent customer reviews, Trading Standards reports, Environmental Health reports and industry insight.

Tourism related Recommendations

9.20 There are a variety of potential recommendations which will involve a wider range of stakeholders across the region:

16. Drawing on existing Council and DMO research, and working with tourism stakeholders, produce a new Tourism Strategy that sets out the agreed key tourism priorities.
17. Examine the options to collaborate on elements of the tourism brief where this makes sense. This could include work to reposition and promote the resorts of Hastings, St. Leonards and Bexhill which have similar requirements and issues.
18. Encourage season extension through marketing measures with new packages that can appeal to increase the volume of domestic stays.
19. Consider supporting the accommodation sector to join schemes such as Hotel Sustainability Basics from the World Travel and Tourism Council or the VisitEngland Regenerative Tool Kit. This will enable the area's hotels to demonstrate their sustainability credentials and meet the needs of a growing traveller segment seeking sustainable accommodation options.[67]
20. Continue to support small accommodation businesses with a bespoke programme to upgrade their skills in AI and digital marketing, best practice in sustainability and accessibility as well as new product / experience development.

[67] WTTC (2026) Hotel Sustainability Basics - Further information at this link. Details of VisitEngland's Regenerative Tourism Guide can be found here.

Appendices

Appendix IA – Tourism Economy : Accommodation Stock by Serviced / Non-Serviced & Sub-category

Rother:

Category	Establishments	%	Sub-Category	Properties	%	Serviced				Non Serviced						Camping	
						Rooms	%	Beds	%	Units	%	Rooms	%	Beds	%	Units/Pitches	Beds
Serviced	66	40%	Hotel	23	13%	408	53%	816	53%								
			Hotel - Branded Budget	0	0%	0	0%	0	0%								
			B&B / Guest House	27	15%	111	14%	224	15%								
			Pub / Inn	14	8%	95	12%	190	12%								
			Residential Accommodation	3	2%	160	21%	313	20%								
			Other Serviced	0	0%	0	0%	0	0%								
Non-Serviced	98	60%	Self Catering Apartment	0	0%					0	0%	0	0%	0	0%		
			Self Catering House / Cottage	59	32%					80	37%	196	53%	346	39%		
			Holiday Park / Lodge	3	2%					56	26%	98	26%	262	30%		
			Hostel / Bunkhouse	0	0%					0	0%	0	0%	0	0%		
			Other non-serviced	0	0%					0	0%	0	0%	0	0%		
			Glamping Site	16	9%					78	36%	78	21%	272	31%		
			Camping / Caravan	26	14%											1,531	7,071
			PRIVATE Static Caravan Park - SOME FOR HIRE	12	7%											3,099	10,370
	164			**183**		**774**		**1,543**		**214**		**372**		**880**		**4,630**	**17,441**

Hastings:

Category	Establishments	%	Sub-Category	Properties	%	Serviced				Non Serviced						Camping	
						Rooms	%	Beds	%	Units	%	Rooms	%	Beds	%	Units/Pitches	Beds
Serviced	33	67%	Hotel	10	19%	204	30.5%	445	36.8%								
			Hotel - Branded Budget	5	9%	326	48.7%	488	40.4%								
			B&B / Guest House	17	32%	128	19.1%	251	20.8%								
			Pub / Inn	2	4%	11	1.6%	24	2.0%								
			Residential Accommodation	0	0%	0	0.0%	0	0.0%								
			Other Serviced	0	0%	0	0.0%	0	0.0%								
Non-Serviced	16	33%	Self Catering Apartment	8	15%					16	2.2%	33	1.5%	71	1.3%		
			Self Catering House / Cottage	3	6%					3	0.4%	6	0.3%	12	0.2%		
			Holiday Park / Lodge	2	4%					720	97.4%	2,160	98.2%	5,400	98.5%		
			Hostel / Bunkhouse	0	0%					0	0.0%	0	0.0%	0	0.0%		
			Other non-serviced	0	0%					0	0.0%	0	0.0%	0	0.0%		
			Glamping Site	0	0%					0	0.0%	0	0.0%	0	0.0%		
			Camping / Caravan	3	6%											508	2,372
			PRIVATE Static Caravan Park - SOME FOR HIRE	3	6%											175	1,020
			PRIVATE Static Caravan Park - NON-RESIDENTIAL	0	0%											0	0
	49			**53**		**669**		**1,208**		**739**		**2,199**		**5,483**		**683**	**3,392**

Appendix IB – Rother Accommodation Stock - Comparative Assessment against previous benchmarks

Rother	2018			2025			% Change		
Category	Establish ments	Rooms	Beds	Establish ments	Rooms	Beds	Establish ments	Rooms	Beds
Hotels	26	519	1,110	26	568	1,129	0%	9%	2%
B&B / Guest House	70	333	707	27	111	224	-61%	-67%	-68%
Pub / Inn	16	145	312	14	95	190	-13%	-34%	-39%
Self-Catering	281	339	1,574	59	196	346	-79%	-42%	-78%
Caravan/Camping/ Holiday Centre	67	7,172	26,222	57	4,806	17,975	-15%	-33%	-31%
Airbnb	430	430	2150	1,800	3,902	8,809	319%	807%	310%
Total (Ex Airbnb)	460	8,508	29,925	183	5,776	19,864	-60%	-32%	-34%
Total (Incl Airbnb)	890	8,938	32,075	1,983	9,678	28,673	123%	8%	-11%

Appendix IB – Hastings Accommodation Stock - Comparative Assessment against previous benchmarks

Hastings	2016			2025			% Change		
Category	Establishments	Rooms	Bed-spaces	Establishments	Rooms	Bed-spaces	Establishments	Rooms	Bed-spaces
Hotels and similar establishments	74	910	2,105	34	669	1,208	-54%	-26%	-43%
Holiday Dwellings (Self-Catering)	51	94	279	11	39	83	-78%	-59%	-70%
Tourist campsites	6	2,441	9,096	8	2,843	8,792	33%	16%	-3%
Other collective accommodation	2	110	142	0	0	0	-100%	-100%	-100%
Total (excl. Airbnb)	133	3,555	11,622	53	3,551	10,083	-60%	-0.1%	-13%
Airbnb	n/a	n/a	n/a	1,187	1,970	4,652			
Total (incl. Airbnb)	n/a	n/a	n/a	1,240	5,521	14,735	832%	55%	27%

NB – Appendix IB tables are not exactly aligned in category due to the audits in 2016 & 2018 being differently classified

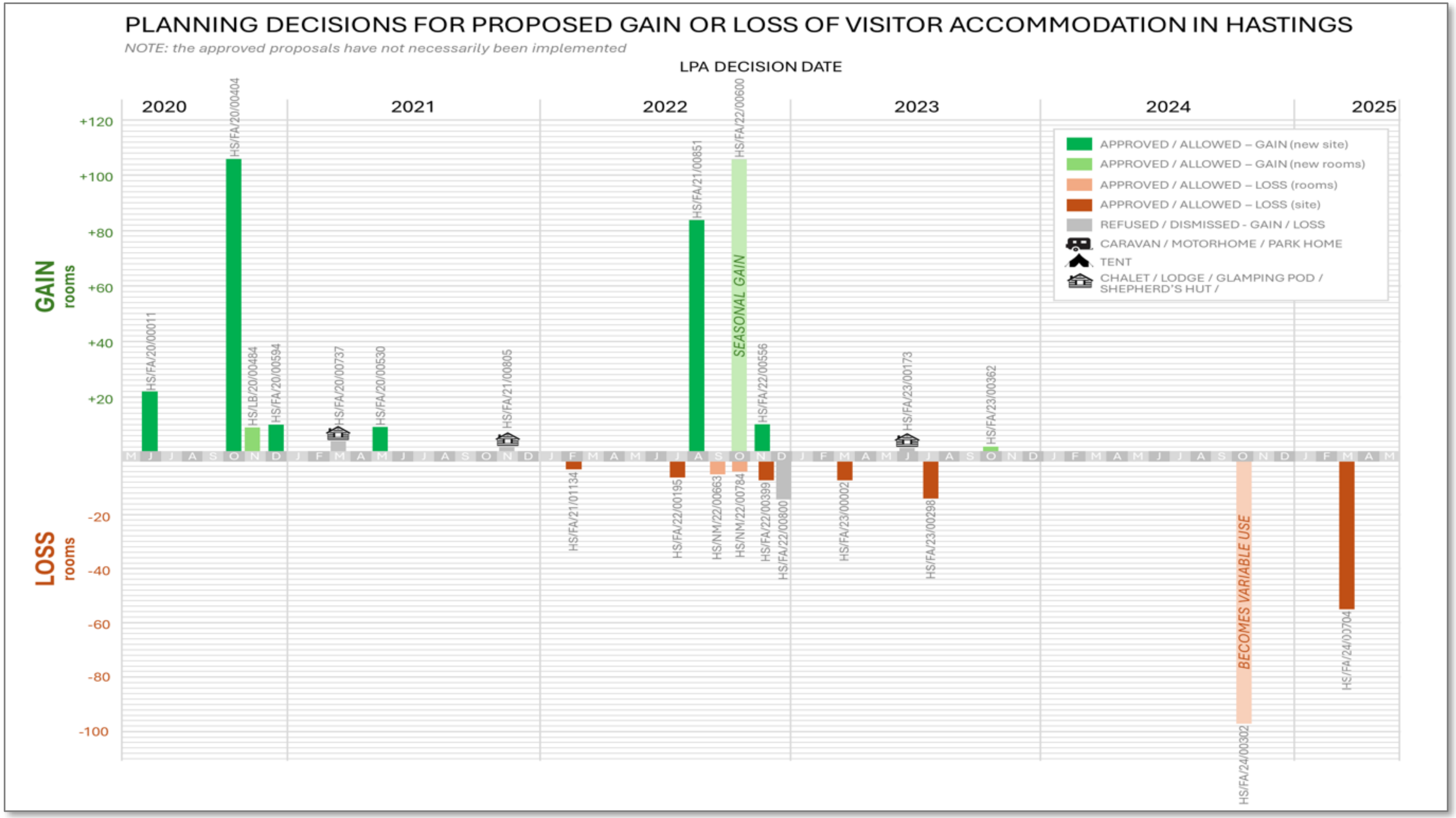
Appendix IC – Sharing Economy Establishments

Ref.	Sharing Economy Establishments	Rother	Hastings	Total	Rye & Camber Parishes
A1	All Units Registered	4,985	3,257	8,242	2,715
A2	All Units Registered – Room Only / (% of total)	1,480 (30%)	961 (30%)	2,441 (30%)	180 (6.6%)
A3	Active Units - trading in last 12 months	1,800	1,187	2,987	961
A4	Ratio: Active Units / Total Households [1]	4.3%	2.9%	3.6%	36%
B1	Room Only (Active Units) / (% of total)	154 (9%)	295 (25%)	449 (15%)	52 (5.4%)
B2	Active Units (less # Room only)	1,646	892	2,538	909
C1	# of active units: 0, 1 or 2 Rooms	1,184	932	2,116	552
C2	# of active units: 3-4 Rooms	522	219	741	367
C3	# of active units: 5-6 Rooms	77	31	108	38
C4	# of active units: Over 6 Rooms	17	5	22	4
D1	Average Revenue per active unit: 0, 1 or 2 Rooms	£17,270	£9,590	£13,430	£16,491
D2	Average Revenue per active unit: 3-4 Rooms	£27,123	£14,873	£20,998	£36,668
D3	Average Revenue per active unit: 5-6 Rooms	£69,056	£66,932	£67,994	£89,370
D4	Average Revenue per active unit: Over 6 Rooms	£59,898	£86,028	£72,963	£49,108

Sources: # STLs Tomorrow's Tourism & AirDNA / # Households - TS041 Number of Households, ONS accessed via NOMIS 13 Feb 2026

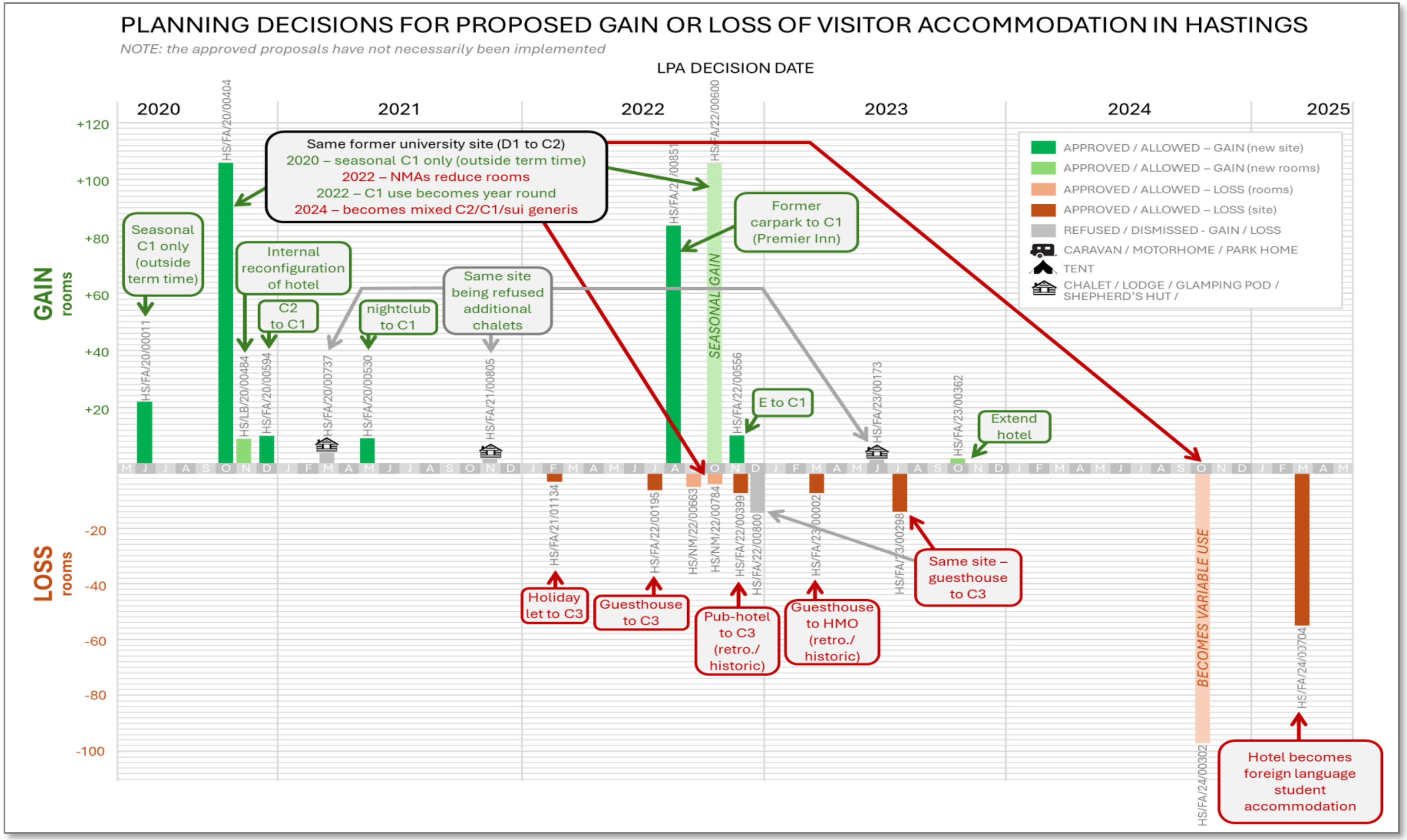
Note: Rother and Hastings columns include all STLs Registered or Trading in last twelve months. Rye and Camber column is included in the Rother column

Appendix IIA – Hastings - History and Scale of Visitor Accommodation Applications



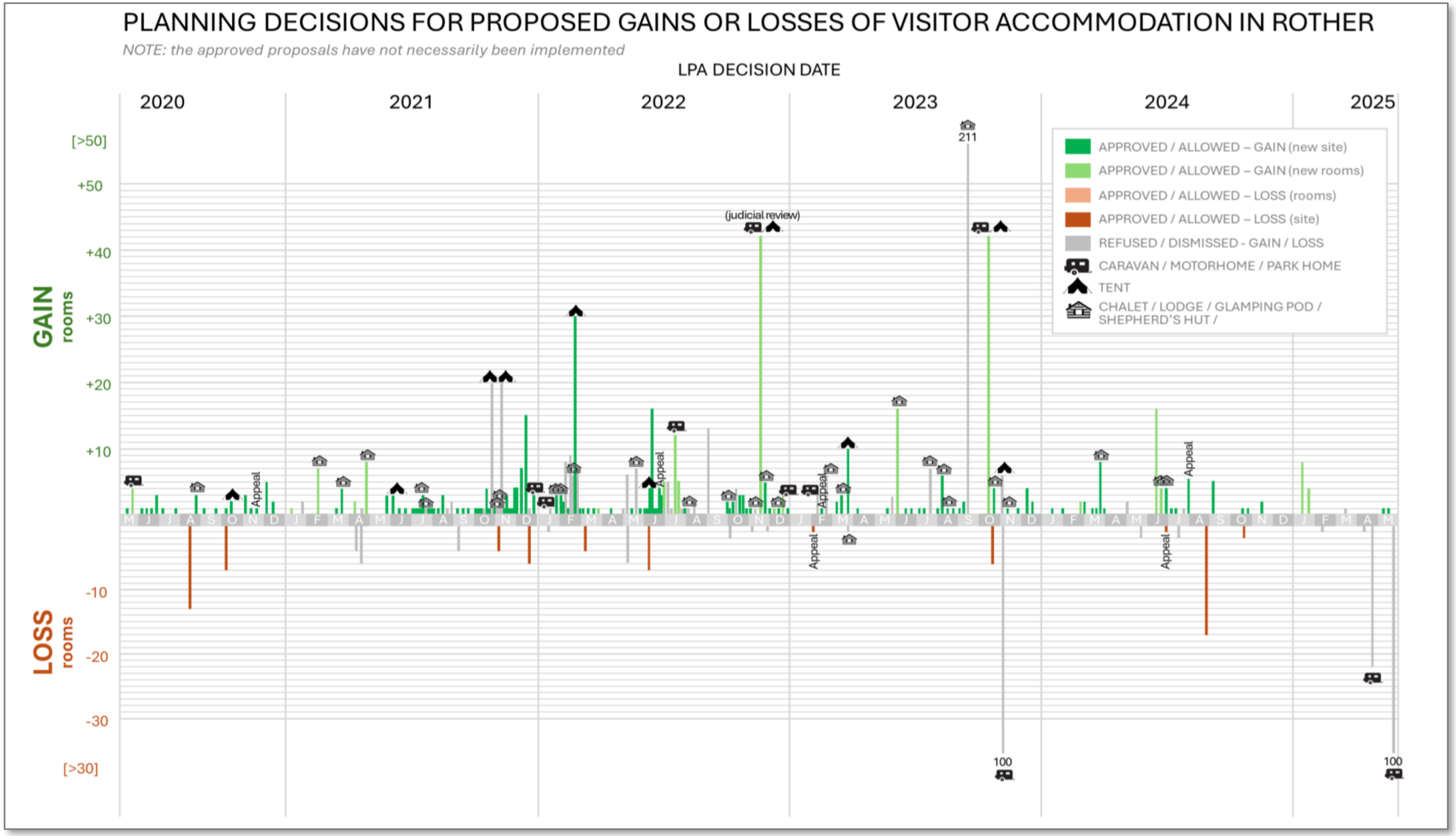
History and scale of applications for loss or gain of visitor accommodation stock in Hastings BC over the last 5 years (Note that the plot is based on decision dates. Note also that approved applications have not necessarily been enacted).

Appendix IIB – Hastings - History and Scale of Visitor Accommodation Applications – Application details



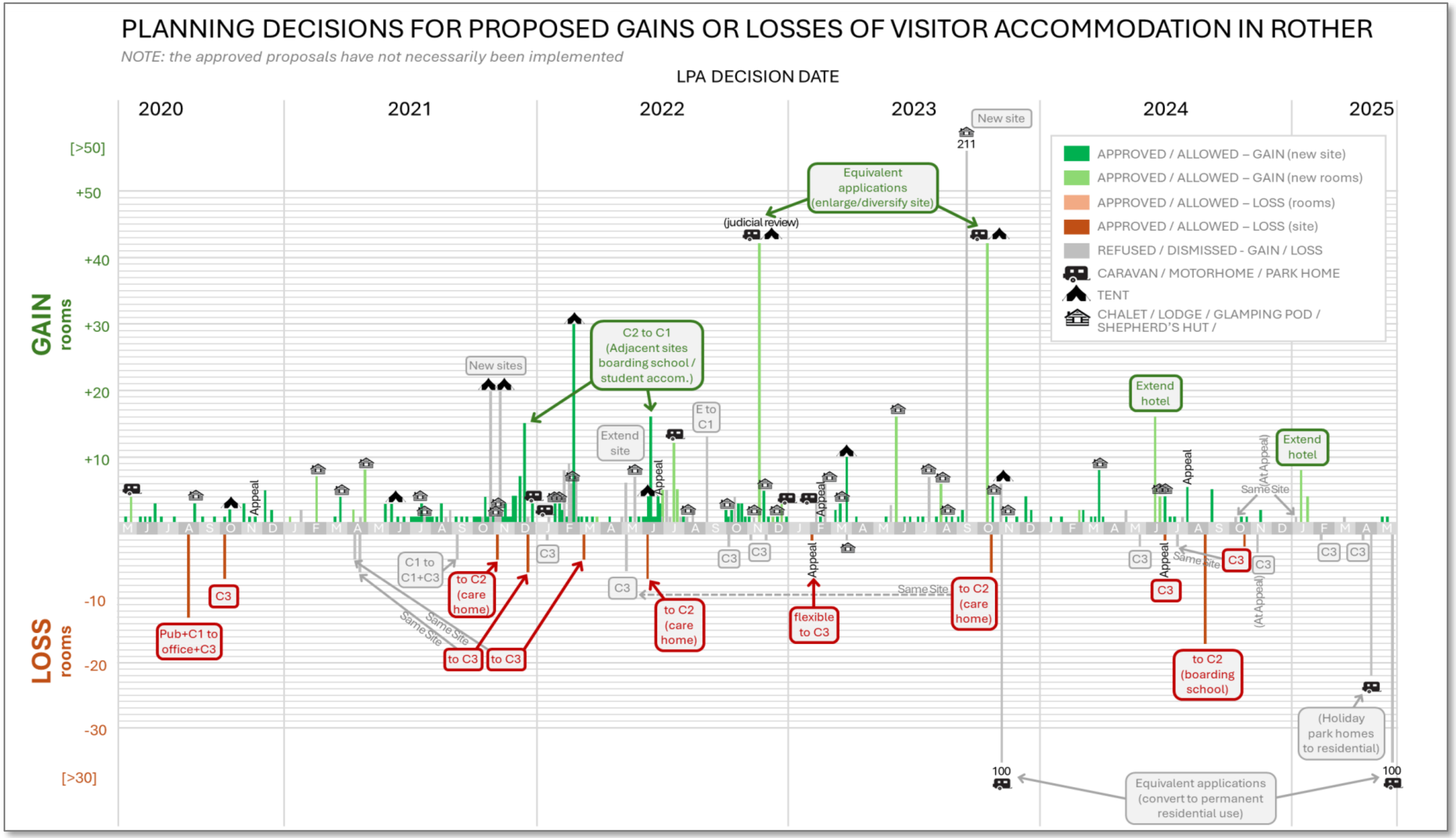
Annotated history and scale of applications for loss or gain of visitor accommodation stock in Hastings BC over the last 5 years.
(Note that the plot is based on decision dates. Note also that approved applications have not necessarily been enacted).

Appendix IIC – Rother - History and Scale of Visitor Accommodation Applications



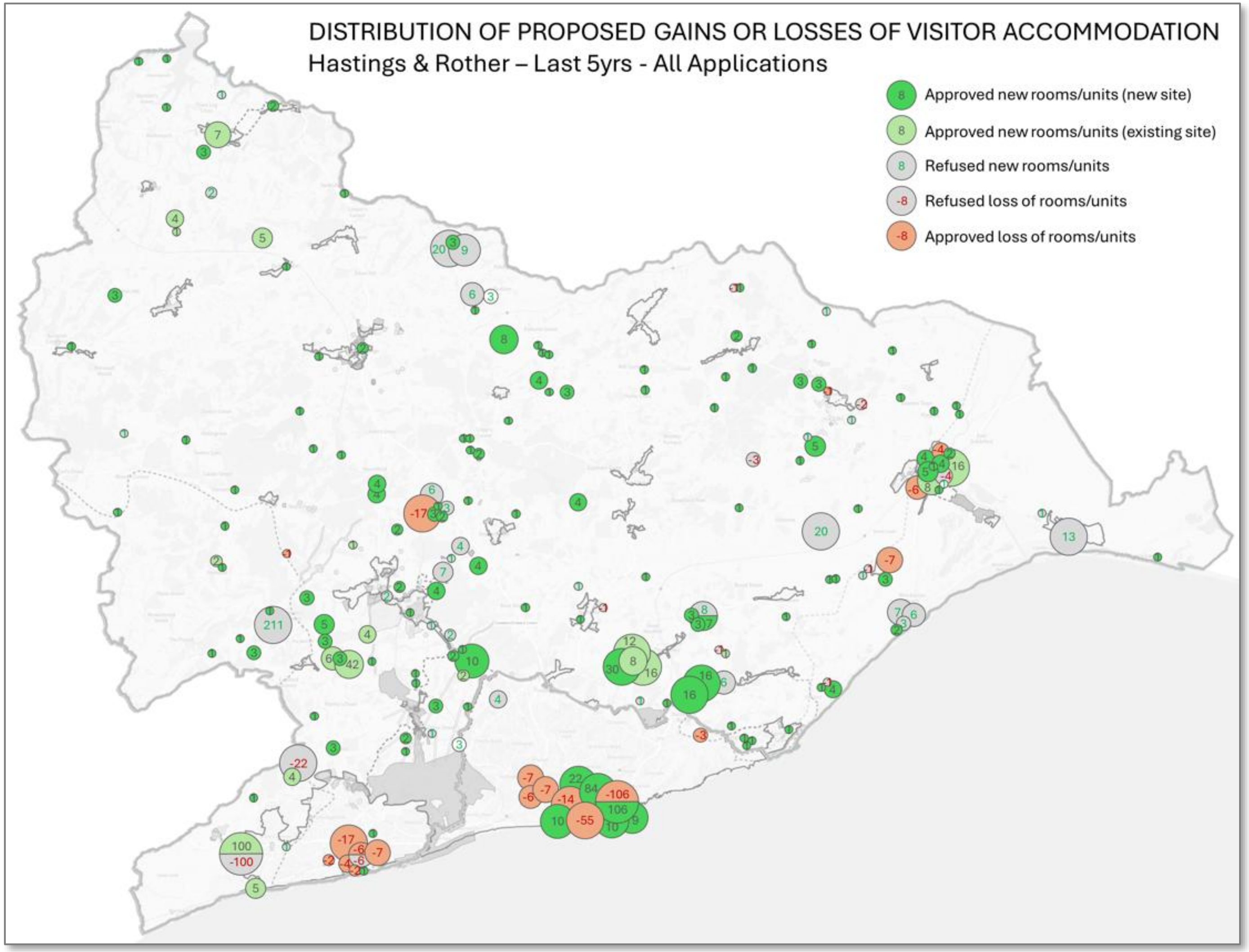
History and scale of applications for loss or gain of visitor accommodation stock in Rother DC over the last 5 years (Note that the plot is based on decision dates. Note also that approved applications have not necessarily been enacted).

Appendix IID – Rother - History and Scale of Visitor Accommodation Applications – Application details



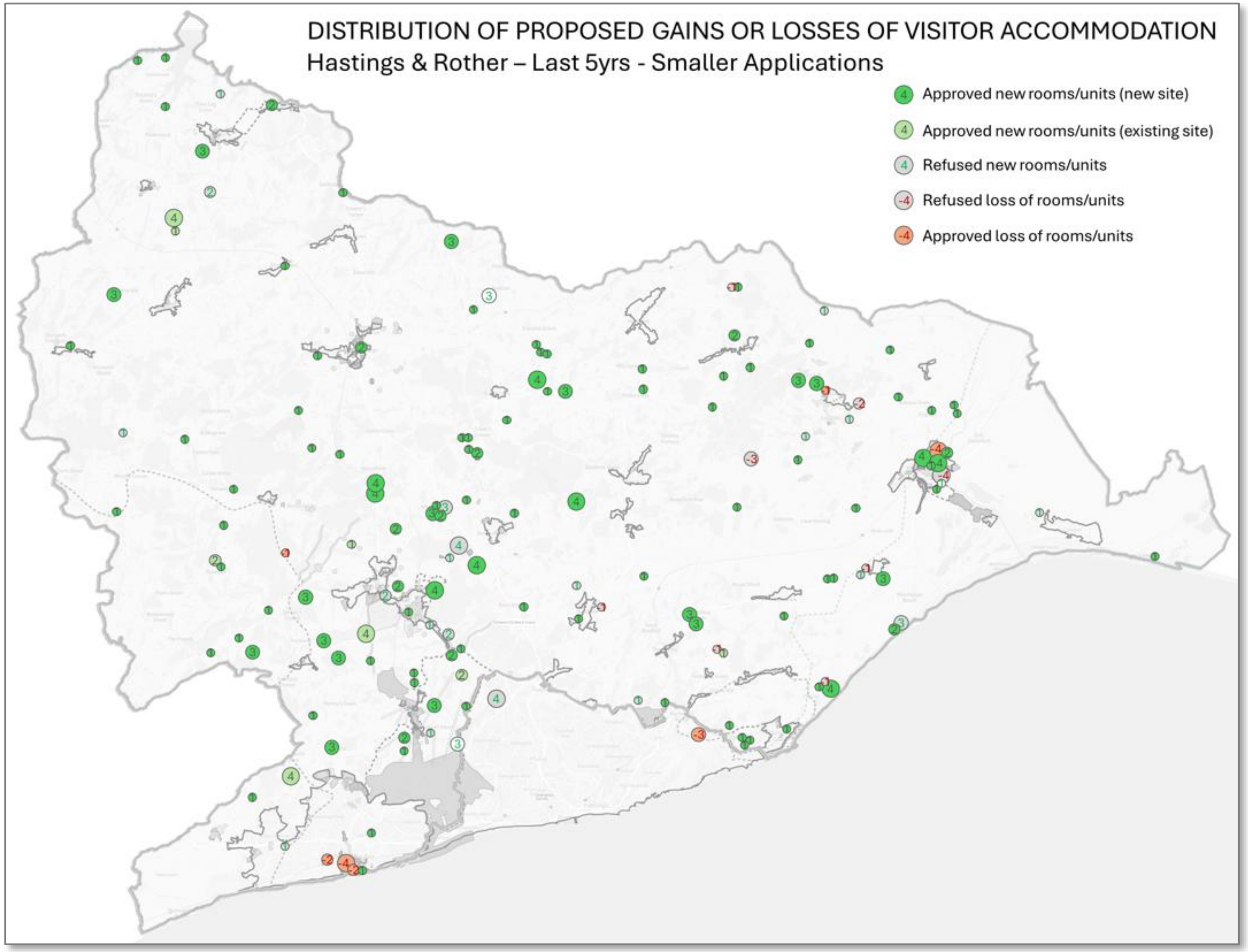
Annotated history and scale of applications for loss or gain of visitor accommodation stock in Rother DC over the last 5 years (Note that the plot is based on decision dates. Note also that approved applications have not necessarily been enacted).

Appendix IIE – Hastings & Rother - Distribution of Visitor Accommodation Applications



Locations for all applications for loss / gain of visitor accommodation in HBC and RDC over the last 5 years (circle size loosely proportionate to no. rooms/units).

Appendix IIF – Hastings & Rother - Distribution of Visitor Accommodation Applications – Smaller Applications (1-4 rooms/units)



Locations for smaller applications for loss / gain of visitor accommodation in HBC and RDC over the last 5 years (circle size loosely proportionate to no. rooms/units).

Appendix III – Draft Screening Assessment for Change of Use

SCREENING ASSESSMENT TO INDICATE WHETHER AN APPLICATION SHOULD BE INVITED DUE TO AN APPARENT CHANGE OF USE from C3 to Sui Generis Short Term Holiday Let (STL)
(Indicative Framework to Assist Officers in Assessing Potential Change of Use (C3 → Short-Term Let SG))

Consideration	Critical Threshold / Key Indicators to consider	Indicative Planning Response / Potential Implications
Housing land supply position	Absence of a 5YHLS / current under-delivery of C3 housing	Loss of C3 dwellings likely to conflict with housing supply objectives and Local Plan policies resisting the loss of residential stock.
Services offered	Breakfast, laundry, cleaning, etc.	Provision of regular services may indicate a level of operation not reflective of C3 use
High-amenity features uncharacteristic of typical C3	Saunas, hot tubs, games rooms, swimming pool, courts, bar area, etc. may be non-characteristic of C3.	May indicate commercial use or intensity beyond normal domestic activity, supporting a potential change of use.
Maximum number of individual guests per stay	Consider if occupancy is beyond average household	May suggests intensity more akin to C1 / sui generis visitor accommodation.
High level of occupancy	Most or all bedrooms have 2+ occupants, consideration of fold down sofa beds in living room areas etc	High occupancy level indicates intensity inconsistent with normal residential occupation.
Proportion of total bedrooms offered as STL	>50% of bedrooms	May indicate partial or mixed use; potential material change depending on frequency and intensity.
Proportion of overall property offered as STL	50 % GIA offered at STL	% May indicates primary use has shifted away from residential; likely sui generis.
Number of days let per year	Use of Business Rates threshold i.e. Available for at least 140 nights and let for at least 70 nights.	Exceeds London threshold; could indicate material change of use, even outside London.
Duration of individual stays	Consider if length of stay is akin to ‘holiday’ or, if occupied for long term duration	Short turnaround suggests transient, commercial occupancy inconsistent with C3 use.

Neighbour amenity	Noise, privacy, lighting impacts; frequent comings and goings, proximity to neighbours, waste disposal etc	Potential breach of amenity policies; supports material change of use assessment.
Track record	History of complaints, Environmental Complaints etc (noise, disturbance, etc.)	Strong indicator of impact; may indicate COU has occurred
Parking	Consider location of site and proposed parking facilities (if any).	May exacerbate local amenity and highway issues; may indicate COU has occurred
Highways	Material increase in traffic and change in character of area, may be beyond what would normally be expected	Reinforces case for material change due to intensified activity.
Local character	Outwardly obvious use as STL (signage, visitor activity, etc.)	Indicates departure from residential character; supports change of use finding.
Proximity to services, attractions & public transport	Excessive private vehicle trips or high occupant turnover linked to location	May increase cumulative impacts; material to planning judgment.
Direct conflict / competition with C1	Within an area designated for hotels / tourist accommodation zones	Potential policy conflict or overconcentration; requires careful assessment.
Cumulative impact on residential neighbourhoods / over-proliferation of STLs	Excessive STL % presence in a street or C3 dwellings ‘sandwiched’ between two STLs	Suggests loss of community balance and material impact on residential character;

Appendix IV – Examples of new build visitor accommodation applications as a potential 'back-door' mechanism to create permanent dwellings.

NB All Applications are anonymised with an X

Example 1 – This site has a 70-year planning history of repeated renewals for 10-year temporary use as a caravan site. Application used Section 73 to establish the holiday use as permanent (citing a Planning Practice Guidance argument against repeated renewals of temporary use). Application then sought removal of the condition restricting permanent residential use. This was refused based on the relevant policy and viability criteria conflicts, as was the subsequent application Ref XXX.

Example 2 – The site was approved in the 1970s for use as a holiday caravan. Application Ref. X approved replacement of the caravan with a permanent log cabin (asserting that the caravan had become unfit). Application Ref XX was then submitted a few years later seeking variation of condition to allow permanent residential use, citing personal circumstances. The application was refused and an appeal dismissed, based on conflicts with the relevant policy (including space standards) and viability criteria and including rejection of an 11d) argument.

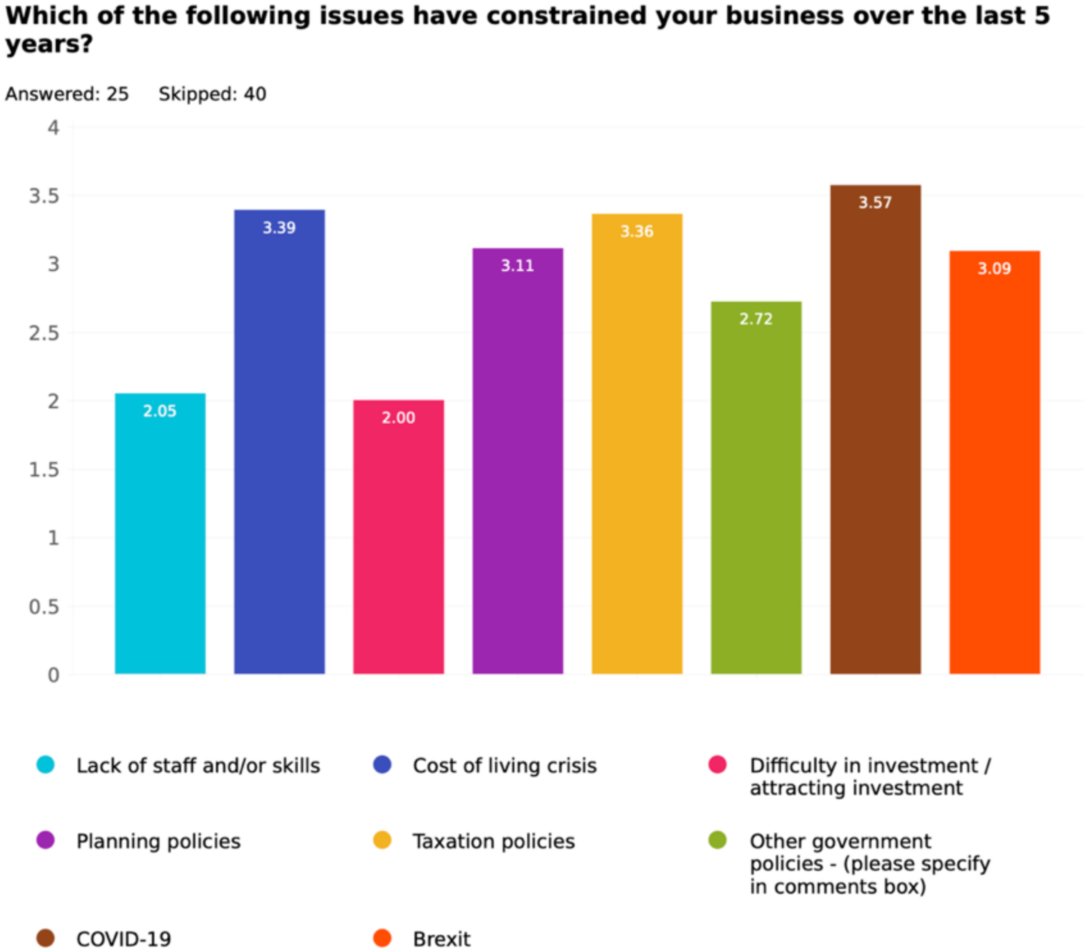
Example 3 - Application Ref. X approved conversion of the existing dairy unit to a holiday let, though this use was apparently never enacted. Application Ref. XX subsequently sought an LDC for permanent residential use, which was refused due to insufficient history. A series of subsequent planning applications for change of use to residential / worker dwelling were refused based on policy and viability criteria (and an absence of need for a worker dwelling).

Example 4 – Multiple applications were made since the 1970s seeking conversion of a 'structure' to a dwelling, all of which were refused. However, Application X was allowed at appeal in 2007 for a commercial storage use. Application XX was subsequently approved for change of use from storage to visitor accommodation, presented as an application to *'convert from one commercial use to another'*. Application XXX then sought to remove the conditions restricting residential use but was refused due to conflicts with policy and viability criteria and the unjustified creation of a new dwelling in the countryside.

Example 5 – Application X was approved for the change of use of the existing shop to visitor accommodation, noting that the Tourism Futures Study had identified a need for this type of accommodation. It was also cited that all of the other shops in the parade had changed to a residential use. The conversion process allegedly took until 2019 to complete, and the site was evidently never used as visitor accommodation. Application XX then sought to vary the conditions restricting permanent residential use but was refused and dismissed based on conflict with the relevant policy and viability criteria.

Example 6 – Repeated approvals since the 1980's established and enhanced the building as a traditional guesthouse. Application X approved conversion of the site to holiday flats and an owner's flat due to the owner's personal circumstances (becoming too elderly to run a guesthouse but seeking to retain some visitor accommodation). A decade later, Application XX sought to remove the conditions restricting permanent residential use based on the then owner's personal circumstances. The application was refused as a 'procedural error' (not S73), but Committee accepted that the personal circumstances were material and the subsequent Application XXX was approved, noting Committee's acceptance of the principle.

Appendix V – Constraints to Business Performance



[Other (please specify)]

- The planning department appears to be anti business. It's like working with the thought police.
- Rother Planning department allowing all the new planning applications. The market is flooded.
- Lack of investment by local authorities - closing the public toilets, charging £30 a day to park at the beach, closing swimming pool in Rye, potholes that visitors aren't expecting when visiting the area, water and electricity cuts, sheer amount of unregulated Airbnb's in the area that don't conform to correct insurances, mortgages, electrical certificates, fire regulations, tax and accounts.
- No foreign guests booked with us at all.
- Hostility to overseas tourists from govt policies eg visa charge, language, Brexit.
- UK guests financially constrained re spending.
- Increased council tax would make business unviable so local employment reduced.
- Furnished Holiday Lettings (FHL) tax regime is being abolished from April 2025, removing key tax advantages such as mortgage interest relief, capital allowances on furnishings, and reduced capital gains tax rates–making it more expensive to operate.
- New planning rules and a national registration scheme are being introduced for short-term lets, but the details are still emerging and vary by area, creating confusion and uncertainty for small businesses trying to understand what permissions or actions are required to remain compliant.
- New fire regulations on holiday lets cost £4,000.
- Second home benefits restraints.
- Mortgage rates going up.
- Cleaning agency costs rising considerably.
- Water, gas and electricity rising considerably.
- Adding 100% premium to second home owners is crippling
- VAT and business rates, along with energy costs are the biggest barrier to growth.

Appendix VI National Planning Context

This Appendix provides a review of proposed legislative (planning) changes in relation to visitor / tourist accommodation. The relevant potential changes are:

- The National Planning Policy Framework – Dec 2025 with 2026 draft awaited
- Potential introduction of use class C5;
- Statutory Registration Scheme for Short-term lets;
- Potential introduction of Permitted Development Right to allow C1 (hotels) to change to C3 (dwellinghouses).

National Planning Policy Framework (NPPF)

The NPPF recognises the need to providing the conditions for long term economic growth including the need to support business investment and employment at the most appropriate level:

a. Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas,
b. Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
c. Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. This includes:
    iii. the expansion or modernisation of other businesses of local, regional or national importance to support economic growth and resilience (including industries such as leisure and tourism which may be of particular importance in certain areas).

Potential introduction of use class C5 (and associated permitted development right)

The Planning and Infrastructure Act became law in December 2025. Prior to this the previous Government consulted on a number of changes these included the introduction of a new 'C5' use class for visitor accommodation and a statutory registration scheme for short-term holiday lets.

There is currently no formal 'use-class' categorisation for short-term lets within the planning system. In the current absence of a dedicated use class, ambiguity exists as to where short-term lets 'should' belong – currently they can be classed as C1 (hotels), as 'sui generis' (i.e. 'in a class by itself') or, in some cases, C3 (residential dwellinghouses).

In addition to the introduction of a C5 use class, the Consultation further proposed an associated permitted development right (PDR) for the change of use from a C3 dwellinghouse to a C5 short term let and vice versa. In a situation where a local authority recognises a local issue regarding the occurrence of C5 properties, the consultation stated:

> *'Local planning authorities may remove a permitted development right by making an Article 4 direction in line with national policy set out in paragraph 53 of the National Planning Policy Framework:*
> *'a) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)*
> *b) in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*
> *c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible.'*

Article 4 directions may be made as 'immediate' or 'non-immediate', with differing advantages and disadvantages for both approaches. An 'immediate' Article 4 direction benefits from its immediacy but can result in subsequent issues such as compensation payments. A 'non-immediate' Article 4 might avoid such consequences but, by being non-immediate, allows for the rushed enactment of the PDR prior to the Article 4 coming into force – thus, property owners / developers might be prompted to enact the PD right (C3 to C5 or vice versa) with the awareness that the window of opportunity is limited.

It should be noted, however, that Paragraph 54 c) states that, when considering the use of Article 4 directions to remove national PDRs, this must 'in all cases, be based on robust evidence'. Further, any Article 4 direction should relate to the smallest geographical area possible. In considering an Article 4, resources must be allocated to gather evidence and, depending on the evidence, to draft and propose the Article 4 direction with supporting justification. The information gathered as a result of this study could be considered as evidence towards justifying such a proposal.

Statutory Registration Scheme for Short-term lets

At the time of writing there is no ‘register of short-term lets’ but further to the Levelling Up and Regeneration Action 2023 and a related consultation, DCMS is understood to have developed a system that is now at testing stage. The scheme will potentially be overseen by VisitEngland. Roll out is likely in 2026 with a mandatory requirement by April 2027.

Potential introduction of permitted development right for C1 (hotels) to C3 (dwellings)

The previous Government also considered the establishment of a PDR for the conversion of ‘C1’ sites (hotels, boarding houses, guesthouses) to ‘C3’ use (dwellinghouses). This move was considered in order to contribute towards meeting local housing demands.

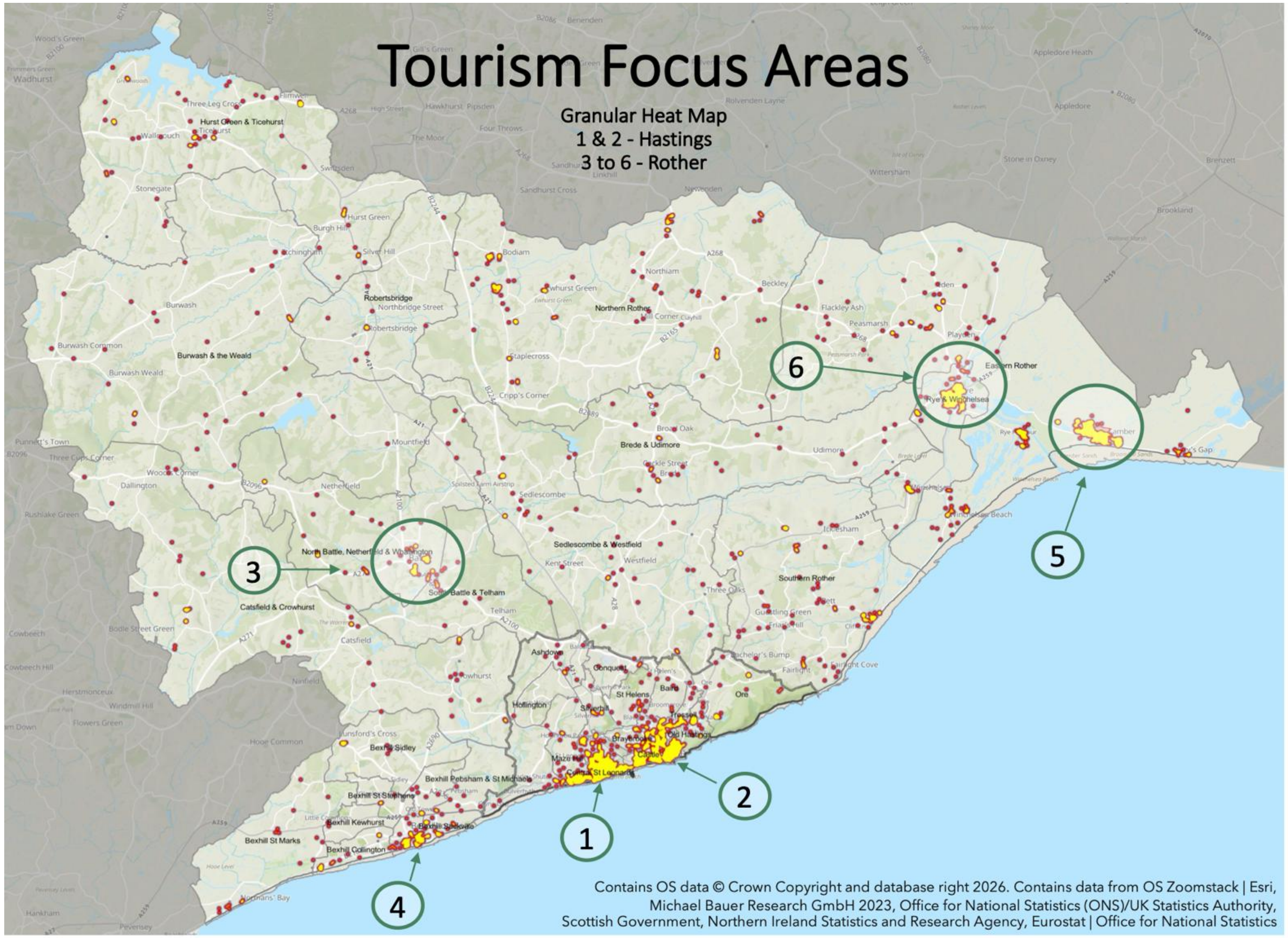
A consultation ran in 2023 on various proposed changes to PDRs, including the change of use (COU) from C1 to C3. Although some of the proposed PDR changes have subsequently come into effect, there has been no action on the PDR for C1 to C3.

A comparable PDR termed ‘Class MA’ has already been established for the COU of commercial (‘Class E’) sites to dwellinghouses (C3). Note, a ‘prior approval’ application is required for this right. According to the consultation, the proposed C1 to C3 right could be achieved by an expansion of Class MA, to include C1, or through the creation of a separate new PDR. This would be via ‘prior approval’ and, as such, an application would be required.

An undesirable outcome of the existing Class MA right is noted – this is the loss of commercial units in town centres and high streets without the need for a planning application. An unintended loss of key hotels and guesthouses could similarly result from the introduction of a C1 to C3 PDR. It is noted, however, that the consultation has sought views on whether the approval process for the C1 to C3 PD right should include an assessment of ‘*the impacts the change of use could have on the local tourism economy’*.

Considering that a new PDR could allow for a COU from C1 to C3 without a planning application, it is strongly indicated that an Article 4 direction should at least be considered – in particular for those areas with the most valuable visitor stock / stock worthy of retention. There would be a clear and obvious risk of key C1 stock being lost if the PDR for C1 to C3 was introduced whilst there were no Article 4 direction in place to protect such key sites. The introduction of the PDR could result in hotel stock being lost to housing in a very short period of time and this could only be stemmed when an Article 4 direction came into force

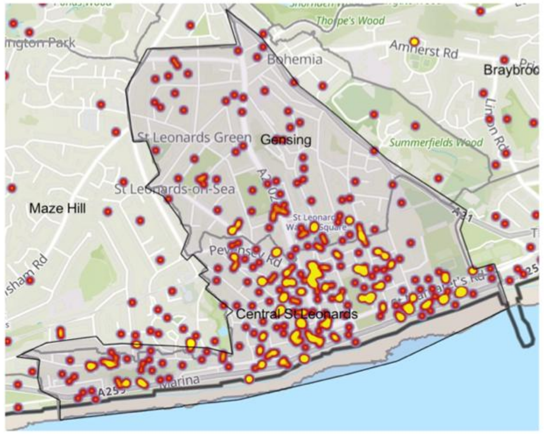
Appendix VII – Tourism Focus Areas



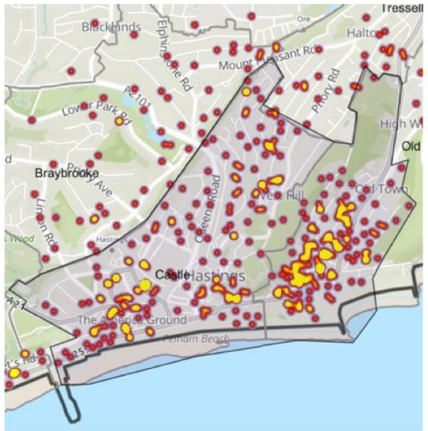
Appendix VII – Tourism Focus Areas – Hastings

HASTINGS

Central St. Leonards / Gensing
Ward References E05011205 / E05011207



Castle & Old Hastings (SW)
Ward References E05011204 / E05011210



Supported:

Serviced Accommodation

- C1 Leisure & Business Hotels
- C1 Aparthotels
- CI Boutique Bed & Breakfasts

Non-Serviced Accommodation

- C1 Self Catering Accommodation
- Hybrid formats

Less need for

- Traditional Bed & Breakfasts
- 2 Star / lower quality hotels

Appendix VII – Tourism Focus Areas – Rother

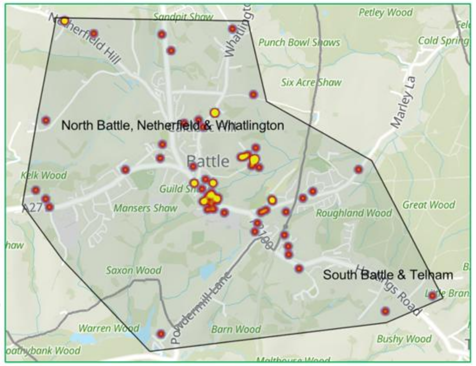
ROTHER

Battle
Ward References: E05011623 / E05011618

Supported:
Serviced Accommodation
- C1 Townhouse & Country House Hotels
- C1 Boutique Bed & Breakfasts

Non-Serviced Accommodation
- Hybrid formats
- Camping & Glamping

Less need for:
- Traditional B&Bs

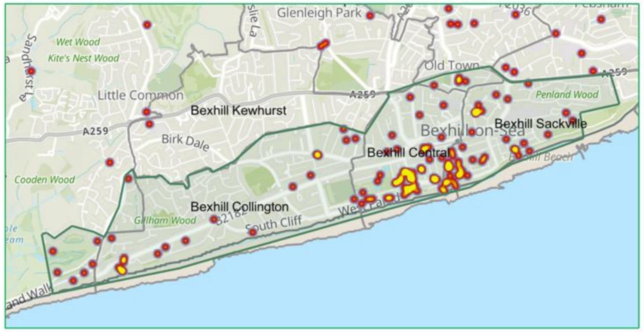


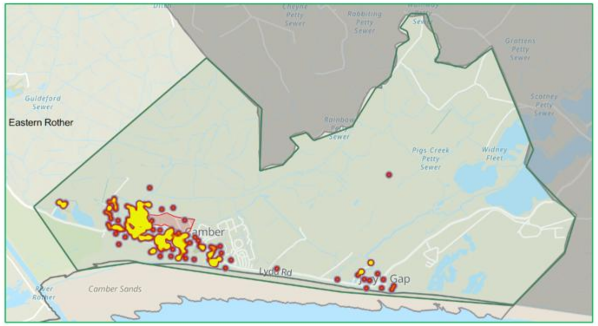
Bexhill Collington, Central, Sackville
Ward References: E05011605 / E05011604 / E05011609

Supported:
Serviced Accommodation
- C1 Leisure & Business Hotels
- C1 Aparthotels
- C1 Boutique Bed & Breakfasts

Non-Serviced Accommodation
- C1 Self Catering Accommodation
- Hybrid formats

Less need for:
- Traditional B&Bs or
- Lower quality hotels





Supported:
Serviced Accommodation
- C1 Boutique Bed & Breakfasts

Non-Serviced Accommodation
- Hybrid formats
- Self Catered holiday homes
- Camping & Glamping
- Holiday Park (shaded red)

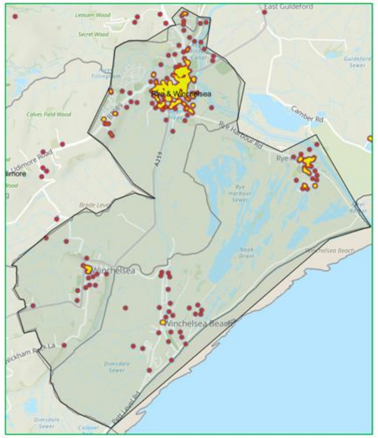
Less need for:
- Short term lets

Camber
Ward Reference: E05011616

Supported:
Serviced Accommodation
- C1 Boutique Hotels (Rye)
- C1 Bed & Breakfasts

Non-Serviced Accommodation
- Hybrid formats
- Self Catered holiday homes
- Camping & Glamping

Less need for:
- Short term lets



Rye & Winchelsea
Ward References: Eastern Rother E05011616
Rye & Winchelsea E05011621