<u>Call-in Request: Hastings Register Office – additional information provided</u> <u>by Communities, Economy and Transport</u>

Introduction

The proposed relocation is prompted by the lease ending at the Town Hall in January 2026, after 10 years, and the availability of space at the library. This move offers several advantages, particularly through the integration of two key services within one location which will create a more streamlined experience for residents. Although the Town Hall has served the community well, its facilities are outdated, damp, and deteriorating. Hastings Library, housed in the historic Brassey Institute, a Grade II listed Gothic Revival building dating back to 1878, offers a beautiful setting for ceremonies. The building was refurbished between 2016 and 2018 to modernise facilities while preserving its heritage. We are committed to providing a layout and facilities that meet the needs of all, and we are confident that the new environment will offer an enhanced experience for our customers.

Responses to specific points raised in the call-in

1. No equalities impact assessment was presented at the meeting. The office is proposed to be moved from a ground floor level location to a second floor up 64 steps with a lift that has a record of breaking down. Also the impact on residents of removing these more affordable venues for wedding ceremonies. Mention was made of 34 other venues but many of these are likely to be hotels and private venues which will be more expensive. While HBC could of course continue to promote the use of the town hall as a wedding venue, there is currently no capacity to do so and therefore no guarantee that this can be continued.

Departmental Response

<u>EQIA</u> - An Equality Impact Assessment (EqIA) was prepared by the Service and reviewed by the Equalities Manager in September 2025. The EqIA did not raise any material equalities concerns that could not be mitigated. This considered the potential impact of the proposed relocation of Hastings Registration Service to Hastings library building against each of the protected characteristics. The EqIA proposed an action plan to mitigate negative impacts on accessibility of the relocated Registration Service on older people, disabled people and parents. These have been included as actions in the Co-Location Project. The EqIA is attached to this response for reference.

The significant refurbishment works in Hastings library between 2016 and 2018, included the installation of a new lift and accessible toilets. In addition, consideration was given to the carpet and lighting, creating sensory-friendly environments to reduce sensory overload and ensure suitability for customers with visual impairments.

In relation to age, the EqIA noted that:

- Hastings library is central in the town with good public transport links
- Hastings library is 0.3 miles from the train station, 0.06 miles from the nearest bus stop, and 0.1 miles from a multi-storey car park.
- almost a third of registration and almost a half of library customers are aged 65+

In relation to disability, the EQIA noted that:

- Hastings library has disabled access with accessible public toilets. We will
 continue to design spaces and support customers with disabilities and with
 long-term health conditions.
- In 2022 all libraries were fitted with hearing loops at the counter to support those with hearing impairments as part of on-going work to improve accessibility.
- In Hastings library there is a lift for customers and staff to access all floors of the building.
- Hastings library has ground level access on the ground floor; however, consideration and planning will be given for circumstances for if the lift is out of service. Contingency plans will include emergency alternative provision on the ground floor for if the occasion occurred where the lift was broken and the customer was unable to climb the flights of stairs.
- The registration office area will be designed to reduce barriers for customers that may use a wheelchair or be using walking aids. We will support disabled children and adults with disabilities and with long-term health conditions.

<u>The lift</u> - The lift in Hastings Library is serviced on a regular basis. A lift audit has been undertaken and it is our intention that the recommended upgrades will be implemented prior to the proposed move in August 2026. In addition, a new platform stair lift which has an automatic safety arm and mechanical wheel stop will be installed during Spring 2026. The platform stair lift is a mitigation measure and will provide step free access to the ground floor if there is a need for unplanned maintenance to the main lift.

<u>Consultation rooms</u> - Our plans for the space that the Registration Service will utilise within the library building, include 4 new purpose built consultation rooms on the second floor and 1 on the ground floor. Similar to all of our Registration offices, it is the consultation rooms that will be used for the registration of births and deaths. If there is a need for unplanned maintenance to the lift, customers unable to access the second floor will be able to register births and deaths in the consultation room on the ground floor.

Access Audit - In addition, as per normal County Council practice, once the design of the new registration space within the library building has been finalised,

an access audit will be undertaken and any required amendments to the design made.

<u>Departmental response regarding concerns raised about affordable venues for wedding ceremonies</u>

As was set out in the report to LMTE, the proposal does mean fewer dedicated ceremony rooms, moving from three rooms at the Town Hall, one of which can hold up to 60 guests, to 2 ceremony spaces in the library. One space which will be available 7 days a week and one that will be available on Wednesday afternoons and all day Sunday. The smaller ceremony room at the library could host around 10 seated, more if standing, similar to the current Mayor's parlour in the Town Hall. However, the library also offers flexibility and will allow us to accommodate up to 60 people on the ground floor for ceremonies, just like the Town Hall.

As outlined in the LMTE report, usage of the current rooms in the Town Hall has been modest. In 2024/25, there were 219 bookings, averaging four per week. Based on current demand, the proposed arrangements in the library will meet these requirements. There is no evidence to suggest demand will increase.

Currently within Hastings Borough there are 34 approved marriage premises, and these offer a wide range of venues, at a variety of price points. Should the service relocate to the library building, there would remain in Hastings a wide range of alternative options for customers to consider as venues for their ceremonies.

The price for the new ceremony spaces in the library would be in keeping with all other Council ceremony venues and set in the same way as all fees and charges for East Sussex County Council.

<u>Departmental response regarding Hastings Town Hall becoming an Approved Marriage Premises</u>

ESCC will liaise with HBC to explore opportunities for the Borough Council to continue to use the existing town hall venues as Approved Marriage Premises which would be a potential income generator for the Borough Council. Hasting Borough Council already operate a venue as an Approved Marriage Premises at the Dunbar Hall within Hastings Museum and Art Gallery.

2. At the meeting on Monday the reason given for the lack of public consultation was that the office was moving less than 500 meters. Where is the public information that consultation is only needed for relocations greater than 500 meters?

<u>Departmental response</u>

As there are no proposals to withdraw any of the current registration or library services provided in Hastings following the relocation to the library building

there is no statutory requirement to conduct a consultation. The proximity of the two buildings (0.2 miles) means that the signposting to the new location will be relatively easy. We will put in place a robust communication strategy which will ensure people will have advance notice of the change in location of the registration office.

3. 407 letters as of this morning have been sent to the lead member protesting this decision and the lack of any public consultation. The main issues raised were much more restricted parking access, harder access for older and disabled people, loss of civic pride, impact on town centre businesses and the lack of a fair and open decision making process. The current venue is adjacent to Priory Meadow with plentiful parking. The library has limited on street parking.

Departmental response

Of the 361 letters that were received by the LMTE regarding the proposed relocation of the Hastings Register Office to the Hastings Library building, 358 were based on a draft provided by the Hastings and Rye Green party on the actionnetwork.org website. Unfortunately, we have been unable to respond to these letters as they were sent from a no reply actionnetwork.org email address. In addition, we do not know whether these have been sent by local residents as no address information was provided.

With regard to the concerns raised:

- Lack of public consultation Please see response to point 2 above.
- Harder access for older and disabled people Hastings Library is accessible and currently has customers with a wide variety of needs. As set out in the EqIA, mitigations have been proposed in the action plan for any negative impact and included in the proposed relocation plan.
- Loss of civic pride The Registration Service has operated from the
 Town Hall for the last 10 years, and prior to this was based at the
 Summerfields Civic Centre in Hastings. As stated in the report that was
 considered by the Lead Member for Transport and Environment
 (LMTE) at the LMTE meeting on the 10 November, HBC could retain
 the current ceremony rooms, continuing to offer these spaces and
 generate income for the Borough Council. Alternatively, the Borough
 Council could utilise the space for other civic ceremonies, office space
 for HBC or seek to rent out. Once the lease to the County Council
 ends, the decision on how the space is used is solely a matter for HBC.
- Impact on town centre businesses Hastings library is approximately
 0.2 miles from the Town Hall and there are a number of independent
 cafes, restaurants and other local businesses very close to the library
 building that may benefit from increased footfall.

- Lack of a fair and open decision making process This proposal was considered through the appropriate decision making process. The proposal was considered by the Lead Member for Transport and Environment at the LMTE meeting on the 10 November 2025
- Parking There is on street parking available on numerous roads close to the library. Blue Badge holders can park for free in the pay and display bays and on single/double yellow lines as long as there are no pavement markings. There is a disabled bay approximately 150 yards from the library on Trinty street. There is a multi-story car park 0.1 miles from the library

The lead in time for the implementation of the decision made by the LMTE to relocate Hastings Register Office to the library is 9 months and we will work to review our EqIA to ensure the feedback and the concerns raised are considered and any required mitigations built into the planned implementation of this decision.

4. No mention was made of where citizenship ceremonies will be held. These can be for up to 50 people.

Departmental Response

As part of the relocation appraisal process consideration was given to all the activities and functions undertaken by the Registration Service and how they would be accommodated in the new space within the library building, including citizenship ceremonies.

Citizenship ceremonies are a vital part of the Registration Service's work and they represent a significant milestone in an individual's civic journey, one that should be widely celebrated. For many participants, the ceremony marks the successful conclusion of a long and often challenging process. As a Service it is important that we offer a space which matches the importance of the occasion, and our assessment of the library building concluded that it would be an excellent venue to mark this important milestone.

Citizenship ceremonies can be conducted either in groups or individually, based on personal preference. Currently, for group ceremonies in Hastings the Registration Service schedules up to 20 participants per ceremony, each of whom may bring two guests. Our assessment of the ground floor room within the library building that the Registration Service would use for group ceremonies is that it could comfortably accommodate these events.

5. No mention made that people registering deaths need a dedicated, quiet and reflective space not a busy library to come into at a difficult moment in their lives.

<u>Departmental response</u>

We understand there is concern about the Registration Service being located within a library. However, experience from other areas shows that combining libraries and registration services has been highly effective. Feedback from these co-located sites consistently highlights the convenience and added benefits of bringing these services together.

Research shows that libraries play an important role in supporting people who are bereaved. They provide welcoming spaces, access to resources on grief, and help connect individuals to local support services.

In addition, libraries offer invaluable benefits to new parents and their babies. Currently the two services, Registration and Libraries, work together through the library team automatically registering all new babies for a library card. The proposed relocation will further this service offer through welcoming parents into a safe, welcoming space. Families will see firsthand how they can access free resources, from baby-friendly books to parenting guides and rhymetimes.

Our plans for the space that the Registration Service will utilise within the library building, include 4 new purpose built consultation rooms on the second floor and 1 on the ground floor. Similar to all of our Registration offices, it is the consultation rooms that are used for the registration of births and deaths.

6. No assessment has been made to reflect the future impact of LGR. The registry office provides an income to sustain the town hall as a civic building. Removing this income will affect the long term sustainability of this historic building. While Cllr Daniel referred to a future potential use by a town council, that town council (if one is agreed) would also need a sustainable income stream to maintain this building. This building will then become a liability for the future unitary council. There is no evidence that this impact was assessed as part of the decision making.

Departmental response

At the Cabinet meeting on the 24th September, Cabinet resolved to approve the submission of the business case setting out the proposal for a single unitary council for East Sussex, based on a Continuing Authority model. This proposal was jointly submitted with Hastings Borough Council.

The East Sussex District, Borough and County Council Leaders and Chief Executives meet regularly to oversee the LGR process, provide strategic direction, and ensure that work is co-ordinated. With regard to how the councils across East Sussex work together a key principle is that 'decisions made by all sovereign bodies until vesting day will have the interests of the future Council as an explicit consideration'

In discussions with the Boroughs and Districts it has also been recognised that each council remains sovereign and has legal responsibility to balance its budget until vesting day for a new unitary. Whilst all councils are committed to strong partnership working to fully consider impacts on other councils and/or the new unitary, the principle cannot be the only factor considered.

The LMTE considered all material considerations relevant to the proposal to relocate the Hastings Register Office to Hastings Library. As stated in the LMTE report integrating the Registration Service and Hastings Library within the current library building would deliver revenue savings of £100K. The savings that would be delivered through the relocation of the Service would contribute to the MTFP savings in 2026/2027 and 2027/2028. In addition, that ESCC would liaise with HBC to explore opportunities for the Borough Council to continue to use the existing town hall venues as Approved Marriage Premises which would be a potential income generator for the Borough Council.

Should the One East Sussex proposal be accepted by Government, both Hastings Town Hall and Hastings Library would be part of the unitary council's estate. There is therefore no negative impact on the potential new unitary. The proposal would allow the Town Hall the opportunity to also hold ceremonies which could develop a separate and additional income stream ahead of the new unitary coming into being, as well as providing an additional facility for the area.

When making the decision, it is evident that the LMTE did have regard to the impact on any potential new unitary authority, and put such weight as they considered appropriate on this consideration.

7. No consultation with staff prior to making the decision. While officers at the meeting stated that they had been informed, HBC staff have had direct communication with the staff on the ground who confirmed that they had not been informed before the papers were made public.

Departmental response

Prior to the publication of LMTE report, the Registration Team Manager met with the Hastings Registration Office team that currently work from the Town Hall and informed them of the proposal to relocate to the Hastings Library building. In addition, prior to the publication of the LMTE Report staff that work in Hastings Register Office and Hastings Library were informed by an email from their Team Manager of the proposed relocation. On the day that the LMTE report was published, an email was sent to all registration and library staff to inform them of the plan to relocate.

8. More generally, given LGR, there needs to be much closer collaboration with affected related councils on any decisions that also impact them financially.

While this has been established as a principle it doesn't seem to be being carried out in practice. A clear and transparent process needs to be established for this collaboration over the next two years as part of budget setting processes and agreed with scrutiny committees.

Departmental response

Please see the response to point 6 above. In addition, it is important to highlight that ESCC and HBC Officers work together closely across a range of functions including Community Safety, Gypsy and Travellers, Emergency Planning and Property.

The current lease that HBC granted falls outside the provisions of the Landlord and Tenant Act 1954. Consequently, ESCC has no security of tenure and would be required to vacate the premises at the end of January 2026. ESCC Officers on the 8th October 2025 informed colleagues from HBC that we were considering relocating the Registration Service to the Hastings Library building and that a report recommending this would be considered by the LMTE on the 10 November 2025. Following this initial discussion, ESCC and HBC officers have corresponded a number of times about this matter.