Conversion of Holiday Accommodation to Permanent Residential Use

Revised draft guidance - FOR CONSULTATION
Foreword
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This document provides a seven step guide to owners and developers who wish to convert guest houses into permanent residential use. The guidance will also apply to the change of use of holiday flats and Houses of Multiple Occupation (HMOs).

Over the last few years, Blackpool Council has protected large areas of guest house accommodation. However, as visitor numbers to the resort have continued to fall and guest houses fall out of business use, the application of this policy across most of inner Blackpool has become less tenable. The Council is therefore reviewing the number and extent of guest house areas within Blackpool and the conclusions of this review will be publicised alongside this guidance. As a result of the review, there will be greater flexibility for guest house owners to convert their properties into housing.

Where such a change of use is allowed by our current policies, the number and type of dwellings that can be created is determined by Supplementary Planning Guidance Note 10 (SPG10) – “Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats”. This guidance has raised the quality of conversions but has not prevented the trend towards largely flatted accommodation much of which has been privately rented. Much of this accommodation has been let to people without a stake in the inner resort neighbourhoods and this has worsened the physical, social and economic deprivation prevalent within these areas.

Now that the Council is willing to promote more changes of use, it is determined to ensure that those changes create neighbourhoods of choice. We therefore wish to encourage home ownership within Inner Blackpool, to promote family housing, in particular single family dwellings, and to create streets where people will want to live.

Where the Council is willing to permit guest houses to change into permanent residential use, this Guidance seeks to achieve these objectives by setting out:

- a size of property below which guest houses can only be converted into a single family dwelling;
- size standards for apartments/dwellings where a property is considered to be too large to convert into a single dwelling;
- space standards for rooms within dwellings;
- standards for external facilities and amenities (e.g. gardens and parking space);
- what features the Council wants to be removed from guest houses to create attractive residential streets (e.g. sun lounges).
What follows is a straightforward 8 step guide to making a planning application for the change of use from a guest house into permanent residential use.

**Step 1** will help you to determine whether the Council will allow your property to be converted;

**Step 2** advises how you should measure your property for the purposes of this document;

**Step 3** enables you to determine how many dwellings your property can be converted into;

**Step 4** sets out nine key requirements that you must take on board in developing your conversion proposal;

**Step 5** sets out what features, if any, you will need to remove from your holiday accommodation in converting it to permanent residential use;

**Step 6** sets out the internal space standards that the Council will expect you to meet within your converted property;

**Step 7** sets out the external standards that the Council will expect your converted property to meet.

**Step 8** Complete the checklist on page XX and return it along with your planning application.

Follow each step in turn to draw up your proposals. Once you have drawn up your plans, go back through each step to make sure that these comply with the Guidance. If for any reason you are unable to reach compliance or require any further assistance, please contact:

Development Control Municipal Buildings Corporation Street, Blackpool, FY1 1NF

Tel: (01253) 477477
Email: planning@blackpool.gov.uk
Step 01
Can you change the use of your Guest House?

Most guest houses in Blackpool currently lie within a number of resort neighbourhoods. The boundaries of these are shown on the Proposals Map of the Blackpool Local Plan. You can view this on the web at www.blackpool.gov.uk Environment and Planning/Planning Policy/Planning/Local Plans or view a copy at the Planning Department.

If your guest house is within one of these boundaries, you should refer to Policy RR9 – Resort Neighbourhood Development Proposals Involving the Loss of Holiday Accommodation (see Appendix 4). You should be able to conclude from this policy whether or not the Council will permit a change of use. If this is permissible, steps 2 to 7 of this Guidance will then apply.

If your property lies within the new Guest House Areas, policy RR9 of the Local Plan will still be applicable.

You will need to check with the Planning Department on the status of the new guidance to check whether or not it applies.

Revised Guest House Areas

The Council is reviewing the boundaries of resort neighbourhoods and expects to be replacing these with a number of more tightly defined guest house and Promenade areas. If your guest house lies outside these new areas, the change of use of your guest house to residential accommodation will be allowed in principle. Steps 2 to 7 of this Guidance will then apply.

If your property lies within the new Guest House Areas, policy RR9 of the Local Plan will still be applicable.

You will need to check with the Planning Department on the status of the new guidance to check whether or not it applies.
**Step 02**

**Measuring what you’ve got**

The number and type of dwellings to which you will be able to convert your existing guest house will depend on its current size.

BEFORE making any decisions about what you want to achieve with your building you must determine its total floor area and what it is comprised of.

The ASSESSED FLOOR AREA of the building is taken to be everything within the inside faces of the outside walls. However, the following are EXCLUDED from this figure:

- Street-facing sun-lounges that are an addition to the original property
- 50% of any room area within an attic or roof-lift (note 1).
- Porches, balconies, roof terraces and other spaces that are open to the outside
- Garages and Outbuildings

(see figure 1)

If your guest house comprises more than one original property the Assessed Floor Area must be determined for each original building separately (Figure 2).

N.B. ... The Council may check measurements on site following submission of any planning application.
Figure 2: Measuring the Assessed Floor Area of conjoined properties
Step 03
Can Your Building be Divided?

If the Assessed Floor Area of your building is less than 200m$^2$ it must be kept as a single dwelling (figure 3).

If the Assessed Floor Area is greater than 200m$^2$ it may be subdivided. The resulting dwellings must comply with all the standards set out in Steps 6 and 7.

If your property comprises two or more original dwellings step 3 must be applied separately to the assessed floor area of each of the original dwellings.

(Note 2)
**Step 04**

**Key Planning Requirements**

There are Key Planning Requirements that any dwelling or set of dwellings resulting from the conversion of Guest Houses must satisfy.

Your proposal must ensure that ALL of these requirements are met. If not it is likely that your application will be refused.

- Single bedroom dwellings are not permitted in guest house conversions

- No proposals will be permitted that require any significant extension or expansion of the existing building

- All dwellings must be fully self-contained (see Glossary p.24)

- Conversion of basements to habitable rooms will not be permitted.

- All proposed dwellings must achieve a minimum environmental performance standard of Code 2 of the Code for Sustainable Homes (see Appendix 1).

- Any external alterations must improve the building’s appearance and not detrimentally affect the amenity of neighbouring properties

- All rooms apart from bathrooms, toilets, utility, and storage areas must directly receive daylight.

- All dwellings must fully comply with all relevant Building Regulations.

- All dwellings must have direct access to their own outdoor amenity space whether this be garden, balcony or roof terrace sized as per the minimum standards contained in this document (see Step 7 tables 3 and 4).
In order to achieve a high standard of residential amenity and streetscape, the Council will require that all conversion proposals include the removal or replacement of the following NON-ORIGINAL features:

- Sun lounges and entrance porches
- Signs and Awnings
- Roof lifts on the front elevation
- Rear and Side extensions where necessary to meet the standards for external amenity space (see step 7)
Sun Lounges and Entrance Porches
Non-original street-facing sun lounges and porches must be removed and the original facade reinstated. Where it is not possible to restore a facade to match with the remaining built fabric it should be rendered throughout.

Replacement windows and doors must be consistent in proportion and position as those originally built. uPVC windows and doors will not be accepted.

To be implemented within 12 months of Planning Permission being granted.

Signs and awnings
All signs and awnings must be removed unless they form part of the built fabric of the original building.

To be implemented within 12 months of Planning Permission being granted.

Rooflifts
Where an original sloping roof to the front elevation has been replaced with a large extension it must be removed and replaced either as the original roof design or with smaller, sensitively designed dormer(s). Guidance for this can be found in the ‘Extending Your Home’ Supplementary Planning Document (SPD) available from the Planning Department or online.

To be implemented within 36 months of Planning Permission being granted.
**Step 06**

**Internal Space Standards**

In order to create dwellings that have adequate space to enable flexible use and a good quality of life the Council has set minimum standards for the sizes of rooms as shown in Tables 1-3. These standards are drawn from research and guidance from Building Research Establishment (BRE), Homes and Communities Agency (HCA), The Greater London Authority (GLA), Lifetime Homes, Commission for the Built Environment (CABE). Sources for this information and research is provided in Appendix 2.

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>Gross Internal Area (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 bedroom</td>
<td>67</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>92</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>106</td>
</tr>
<tr>
<td>5 bedroom</td>
<td>121</td>
</tr>
</tbody>
</table>

N.B.01 These figures do not include spaces shared between dwellings, such as common stairs.

N.B.02 A minimum of 5% of the internal area must be given over to storage.
Table 2: MINIMUM Bedroom sizes

<table>
<thead>
<tr>
<th></th>
<th>MINIMUM Area (m²)</th>
<th>MINIMUM dimensions (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Bedroom</td>
<td>8</td>
<td>1.7 (clear floor)</td>
</tr>
<tr>
<td>Double Bedroom</td>
<td>12</td>
<td>2.6 (clear floor)</td>
</tr>
</tbody>
</table>

N.B.01 Ensuite bathrooms or shower rooms do not count towards these figures

N.B.02 Fitted cupboards within bedrooms will count towards the total floor area.

Table 3: MINIMUM internal living space standards (note 4)

<table>
<thead>
<tr>
<th>Aggregate figure for kitchen, dining, and lounge per dwelling size:</th>
<th>MINIMUM Area (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 bedroom</td>
<td>27</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>33</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>36</td>
</tr>
<tr>
<td>5 bedroom</td>
<td>39</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Minimum dimensions (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kitchen</td>
</tr>
<tr>
<td>Dining area</td>
</tr>
<tr>
<td>Lounge</td>
</tr>
</tbody>
</table>
**Step 07**

**External Spaces**

External amenity space forms an important part of a home providing both utility and recreation space. Each dwelling created must be able to provide the facilities set out in Table 4. If this provision is not able to be met then either the proposed number of dwellings or the size of the dwellings must be reduced.

<table>
<thead>
<tr>
<th>Type of Space</th>
<th>Minimum area (m² unless stated otherwise)</th>
<th>MINIMUM dimensions (m unless stated otherwise)</th>
</tr>
</thead>
<tbody>
<tr>
<td>External amenity space per dwelling with ground floor access (unless demonstrated to be unachievable)</td>
<td>25 (in one area)</td>
<td>3</td>
</tr>
<tr>
<td>Directly accessible external space per dwelling without ground floor access</td>
<td>5</td>
<td>1.5</td>
</tr>
<tr>
<td>Parking Space in addition to external amenity space</td>
<td>1 space per dwelling (Maximum)</td>
<td>See Figure 7</td>
</tr>
<tr>
<td>Bike Storage in addition to external amenity space</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Waste Storage adequate for 3x180 litres wheeled bins (per dwelling) in addition to the external amenity space</td>
<td>3.6</td>
<td>See Figure 6</td>
</tr>
</tbody>
</table>
Garden Provision

Garden space must be a minimum of 25m² in one area with no space that has a dimension of less than 3m counting towards this figure. If bin storage and cycle storage is provided externally this does not count towards the external amenity space area.

Where a property would originally have had a front garden the Council will require this to be restored if it has previously been built on or paved over.

Figure 05: Garden spaces, showing compliant and non-compliant examples.

Acceptable garden space

Unacceptable garden space. Minimum dimension is less than 3m.

Unacceptable garden space. Though the total area is 25m² the area in red has a dimension less than 3m.
**Parking**

The high density and often narrow streets of holiday accommodation areas present a particular challenge for providing adequate car parking to meet the requirements of residents.

An appropriate level of parking should be provided for each property without unduly constraining the viability of residential conversion.

1. There must be one dedicated parking space per dwelling which can be provided on site if one is not available elsewhere.
2. Where parking is to be provided off-street this must be to the rear of the property and must not encroach upon the pavement or prevent the provision of the other facilities set out in this table.
3. Minimum dimensions for off-street car parking spaces are 5m x 2.4m with the space capable of being widened to 3.3m at a later date to meet potential disabled access requirements (See Figure 07).
4. In the event of the above not being achievable on site, then the Council would consider appropriate conveniently located alternative private off-street dedicated parking.

**Bin storage**

Covered waste storage to the side or rear of the property must be provided to hold three standard 180 litre wheeled bins for each dwelling unit. There should be sufficient space to enable easy manoeuvring of the bins and they must be easily accessed from kitchen or utility areas (Figure 06). The store must allow easy access to the street for collection. Storage of waste to the front of properties will not be permitted unless within an approved enclosure.
Bike storage
Ground level, enclosed secure bike storage must be provided for each dwelling. If this storage space is shared between dwellings there must be provision for cycles to be secured individually (Figure 8).
**Step 01**
Is the property in an area where conversion is allowed?

**Step 02**
What is the assessed floor area of your property (-ies)?

**Step 03**
How many dwellings are you proposing?

**Step 04**
Have you met the key requirements?

**Step 05**
Details of architectural features to be removed.

**Step 06**
Have you fully complied with the internal space standards?

**Step 07**
Have you met the external space requirements?

Please complete this checklist and return it with your planning application. Be sure to take a copy before you send it.

Please tick each completed step. If not, please give details.

Please insert Assessed Floor Area (m²):

Please give the number of dwellings and their floor areas:

If not please give details:

Development Control
Municipal Buildings
Corporation Street,
Blackpool,
FY1 1NF
Tel: (01253) 477477
Email: planning@blackpool.gov.uk

Please complete this checklist and return it with your planning application. Be sure to take a copy before you send it.
Appendices
Throughout this document there has been an emphasis on design quality. This is something that is hard to define and perhaps easier to demonstrate through examples. Those shown here are from around the UK and all start from similar original buildings to a Blackpool guest house. These examples are obviously not the only solutions to the challenge of converting a guest house to residential use but are provided as a source of ideas.

Adam Macintosh Associates produced a design for the conversion of an HMO into a generous two bedroom house. With significant overshading to the rear of the property their solution uses an open and well-lit stair well along with an open-plan ground floor and roof lights to draw light through the house.
Adam Macintosh Associates: Granthus HMO conversion section. (Not to Scale)
Arca Architects produced a series of designs for the conversion of guest houses in Morecambe, where there is a similar guest house form to those found in Blackpool.

The example here shows a conversion to a three bedroom house whose external appearance retains its period detail while adding subtle modern design touches. The ground floor layout provides an open plan layout that still provides good definition of the kitchen and living spaces.
In this Guidance the following definitions apply throughout:

**Bed-sitting Room:**
A room which combines the living area with the sleeping area (but not the kitchen)

**Core Strategy:**
The forthcoming Development Plan Document for Blackpool setting out the spatial vision and strategic objectives of the planning framework for the area.

**Design Occupancy Level:**
The number of individuals for which the property is being designed

**Dwelling Unit:**
All rooms, internal circulation and storage space and other internal facilities taken together to form one flat, which will be used exclusively by either a single occupant or group of people living as a single household. A single converted property may therefore consist of more than one dwelling unit.

**Habitable Room:**
A room such as a living room, dining room or bedroom intended for sitting, sleeping and/or leisure purposes. The term excludes purely working kitchens, utility rooms, bathroom or toilet, and storage and circulation space.

**Outbuildings:**
Any constructions within the curtilage of the property that are ancillary to the main building (such as sheds, outdoor toilets, etc...), excluding approved extensions.

**Self-Contained:**
A self-contained unit of accommodation is residential accommodation entered by its own door leading directly off the street or off a common entrance hall, providing a minimum of 1 habitable room, a kitchen, and the exclusive use of an inside bath or shower, wash basin and toilet.
1. The council is discouraging the retention of roof-lifts but acknowledges that well designed habitable roof-space can add greatly to the amenity of a house. The 50% figure works by reducing the area provided by a roof-lift to a figure closer to that of a normal inhabited roof area. Though it also reduces the area of an inhabited rooفض space that is not a roof-lift the reduction in proportion to the overall area of the building is less and is not envisaged as having a detrimental impact on the design potential.

2. In order to assist the creation of high quality residential neighbourhoods throughout Blackpool and to resist further over intensive development, the Council seeks to retain properties most suited to family accommodation as single family dwellings. No conversions and further sub-division of properties with a ASA of less than 200m² will be permitted.

3. A key aim of this guidance is to achieve the creation of high quality homes and residential

neighbourhoods through the conversion of existing guest houses.

The removal of non-original architectural features more appropriate for the building’s in current use as guest house accommodation is considered an important step towards creating an attractive residential streetscape.

4. An aggregate figure of floor area for living room, dining area and kitchen is provided so as to provide less prescriptive guidance to the designer.
RR9 Resort Neighbourhoods
Development Proposals Involving the Loss of Holiday Accommodation

(A) Within Resort Neighbourhoods, including the Promenade frontage, changes of use or redevelopment of holiday accommodation for permanent residential use will only be permitted where:

i. there are already permanent residential uses directly adjoining or abutting both sides of the proposed development and a significant incidence of such uses in the immediate vicinity; or

ii. there is already permanent residential use on one side and a substantial concentration of such uses in the immediate vicinity; and

iii. the proposal relates well in use, scale and appearance to neighbouring properties.

(B) The change of use or redevelopment of holiday accommodation anywhere on the Promenade frontage will only be permitted:

i. where it can be demonstrated that the property has no viable future in holiday accommodation use, or,

ii. exceptionally where the loss of holiday accommodation forms part of wider redevelopment proposals that will deliver clear and substantial regeneration benefits. Permanent residential accommodation will only be permitted where proposals comply with the Council’s floorspace and amenity standards.

The Council will require that applications for the conversion of holiday properties to residential use include appropriate proposals to establish residential character and maximise residential amenity. Such requirements may include the removal of extensions to the property where:

i. the extension is inappropriate to and out of character with use of the premises for residential purposes; and/or

ii. this is necessary to improve residential amenity; and/or

iii. this is necessary in order to minimise the number of additional dwelling units in areas where such conversion could result in or exacerbate problems associated with a combination of high household densities; and deficiencies in supporting community facilities.
Appendix 5 - Code 2 for Sustainable Homes

The Code For Sustainable Homes

British homes account for 27% of our CO\textsubscript{2} emissions (HMSO, 2008). The control and reduction of these emissions and significant increases in other areas of environmental performance are vital if the UK is to achieve the national targets set for environmental performance.

The Code for Sustainable Homes sets a series of environmental performance ratings from 1-6. The rating a home receives depends on how it measures up in nine categories:

- Energy and CO\textsubscript{2} Emissions
- Pollution
- Water
- Health and Wellbeing
- Materials
- Management
- Surface Water Run-off
- Ecology
- Waste

Using Part L1A of the 2006 Building Regulations as a benchmark the Codes for Sustainable Homes set progressively higher targets to achieve and signal the future direction of Building Regulations.

Each code is achieved using a points system which provides flexibility of compliance path within the nine categories listed above. However, the code levels differ in the number of points necessary to be achieved and set targets for energy and water consumption that must be achieved to reach a particular code rating.

Code 2 demands an 18% performance increase in energy use over the 2006 Building Regulations benchmark and a standard water usage of 120 litres per day. This will gain 1.5 points. You must score 43 further points to achieve the Code 2 rating.
• Criteria for the design of Lifetime Homes can be found at:
  www.lifetimehomes.org.uk/pages/criteria1.html

• ‘Extending Your Home’ Supplementary Planning Document is available from:
  (www.blackpool.gov.uk/services/G-L/localdevelopmentframework/publications)

• Information on the Housing Act 2004 can be found on the Blackpool website under ‘Housing Health and Safety Rating System (HHSRS)’ at:
  www.blackpool.gov.uk/Housing/PrivateHousing

• Information on the Codes for Sustainable Homes is available from the Communities and Local Government website in the ‘Greener Homes for the Future’ booklet at:
  www.communities.gov.uk/publications/planningandbuilding/codeleaflet

• Information on Space Standards can be found from the following sources:
  Mayor of London’s office research on space standards:
  www.london.gov.uk/mayor/planning/docs/space-standards.pdf

  English Partnerships Quality Standards document, ‘Places, Homes, People’ available from the English Partnerships website at:
  www.englishpartnerships.co.uk/qualityandinnovationspublications.html#qualitystandards