

# Public Document Pack

# Blackpool Council

27 October 2017

To: Councillors Benson, Blackburn, Cain, Campbell, Cross, Jackson, Kirkland, Smith, I Taylor and Mrs Wright

The above members are requested to attend the:

## **EXECUTIVE**

Monday, 6 November 2017 at 6.00 pm  
in Committee Room A, Town Hall, Blackpool

## **A G E N D A**

### **1 DECLARATIONS OF INTEREST**

Members are asked to declare any interests in the items under consideration and in doing so state:

- (1) the type of interest concerned; and
- (2) the nature of the interest concerned

If any member requires advice on declarations of interests, they are advised to contact the Head of Democratic Governance in advance of the meeting.

- 2 PROPOSAL TO DISSOLVE THE BLACKPOOL, FYLDE AND WYRE ECONOMIC DEVELOPMENT COMPANY AND FORM AN ECONOMIC PROSPERITY BOARD** (Pages 1 - 14)
- 3 LOCAL TRANSPORT PLAN** (Pages 15 - 64)
- 4 ADOPTION OF HOLIDAY ACCOMMODATION SUPPLEMENTARY PLANNING DOCUMENT** (Pages 65 - 162)
- 5 TREASURY MANAGEMENT HALF-YEARLY PROGRESS REPORT TO THE 30 SEPTEMBER 2017** (Pages 163 - 186)
- 6 FINANCIAL PERFORMANCE MONITORING AS AT MONTH 5 2017/18** (Pages 187 - 192)

**Venue information:**

First floor meeting room (lift available), accessible toilets (ground floor), no-smoking building.

**Other information:**

For queries regarding this agenda please contact Lennox Beattie, Executive and Regulatory Manager, Tel: (01253) 477157, e-mail [lennox.beattie@blackpool.gov.uk](mailto:lennox.beattie@blackpool.gov.uk)

Copies of agendas and minutes of Council and committee meetings are available on the Council's website at [www.blackpool.gov.uk](http://www.blackpool.gov.uk).

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Mark Towers, Director of Governance and Partnerships
<b>Relevant Cabinet Member</b>	Councillor Simon Blackburn, Leader of the Council
<b>Date of Meeting:</b>	6 November 2017

## **PROPOSAL TO DISSOLVE THE BLACKPOOL, FYLDE AND WYRE ECONOMIC DEVELOPMENT COMPANY AND FORM AN ECONOMIC PROSPERITY BOARD**

### **1.0 Purpose of the report:**

- 1.1 To consider a more efficient and effective way of managing the governance of the economic development agenda across the Fylde Coast.

### **2.0 Recommendation(s):**

- 2.1 To recommend Council to authorise the Leader of the Council, in his role as ‘member’ of the Blackpool, Fylde and Wyre Economic Development Company (EDC) to dissolve the aforementioned company. (This will require a special resolution of the ‘members’ of the company. In effect this will be the three Leaders of the three Councils signing a resolution to disestablish the company).
- 2.2 Subject to 2.1 above, to establish a Blackpool, Fylde and Wyre Economic Prosperity Board (EPB) in the form of a Joint Committee and approve the Procedure Rules for that Board as appended at Appendix 2a.
- 2.3 Subject to 2.1 above, to confirm that the Leader of the Council will be Authority’s representative on the Economic Prosperity Board and that the Leader of the Council be authorised, in accordance with the Procedure Rules of the Economic Prosperity Board, to appoint a substitute member to attend in his absence, should the need arise
- 2.4 Subject to 2.1 above, that the servicing of the Economic Prosperity Board be undertaken on a rotational basis between the constituent authorities and the Economic Prosperity Board at its first meeting be asked to agree which Authority will commence with that role as the ‘Host Authority’.

2.5 Subject to 2.1 above, to invite Lancashire County Council to be a member of the Economic Prosperity Board on the basis as set out in the Procedure Rules as set out at Appendix 2a.

**3.0 Reasons for recommendation(s):**

3.1 To instill a stronger and robust governance framework for the economic development agenda across the Fylde Coast, bringing in greater political accountability.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

To continue with the Economic Development Company as it is or reconstitute the company with a different set up.

**4.0 Council Priority:**

4.1 The relevant Council Priority is:

“The economy: Maximising growth and opportunity across Blackpool”

**5.0 Background Information**

5.1 In June 2016, a revised set of articles of association for the Blackpool, Fylde and Wyre Economic Development Company was agreed by the Board and subsequently approved by the 'members' (the Leaders of the three Councils). These revised articles were intended to bring the articles up to date and reflect changes such as the departure of Lancashire County Council from the company.

5.2 As part of that process, a governance review was undertaken with a view to changing the articles to reflect the responsibility for programme managing delivery of the Enterprise Zones amongst other things.

5.3 Part of the review also involved the examination of examples of similar arrangements elsewhere across the country. Views were sought and feedback received from the Local Government Association (LGA), who encouraged partners to consider a series of options, some of which represented new ideas beyond the original remit of the review.

- 5.4 Based on this review of the Economic Development Company's current purpose and function and the scope of strategic economic development on the Fylde Coast, it was acknowledged that consideration should be given to alternative models of delivering the kind of governance required. For example, in many areas local partners and clusters of Local Authorities in functional economic areas deliver what is required through an 'Economic Prosperity Committee'. In the context of the Fylde coast, such a committee would comprise of the three councils, with partners (co-opted members), as opposed to the existing company structure. Such an arrangement would deliver effective oversight on the work being undertaken in the Enterprise Zones, political interface and accountability on strategic policy areas for the Fylde coast and the link with the Lancashire Enterprise Partnership.
- 5.5 The review has indicated that a company by its nature is a 'clunky' and inefficient way of delivering joined up working on economic development. A company does not naturally have an oversight role with councils whose representatives make up its Board (i.e. the Chief Executives) and also there are a number of overheads with a company that are not necessary for the duties required such as the production of accounts (whether trading or not), producing an annual confirmation statement, filing returns/ associated fees and paying for insurances for Directors. There is also no direct political accountability, in the current set up.
- 5.6 In considering the formation of a Joint Committee, a number of areas of good practice were reviewed and the attached at Appendix 2a is a draft set Procedure Rules.
- 5.7 Although legally it will be a joint committee, it is recommended that it be known as an Economic Prosperity Board, with in addition to the three Leaders of the Council, there be three co-opted members as formal members of the Board, to reflect the important role and view point that private sector representatives have had on the Economic Development Company (EDC).
- 5.8 The Economic Development Company has proved a good vehicle for officer collaboration, however the three Chief Executives now meet on a regular basis and will act as principal advisers to the new Board. In terms of formally supporting the Board, it is recommended that the servicing of the Board on a constitutional basis be done by rotation (unless otherwise agreed by the Board) and that one of the constituent Authorities acts as the 'Lead Authority' in terms of undertaking the economic duties delegated to the Board by the constituent authorities.
- 5.9 **Is the Corporate Delivery Unit aware of this report?** Yes

The Corporate Delivery Unit has been consulted on the report but does not have any issues to raise.

5.10 Does the information submitted include any exempt information? No

5.11 **List of Appendices:**

Appendix 2a – Proposed Procedure Rules for the Economic Prosperity Board.

**6.0 Legal considerations:**

6.1 A Joint Committee can be formed pursuant to powers under the Local Government Acts 1972 and 2000 and under the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.

**7.0 Human Resources considerations:**

7.1 The support for the Joint Committee could be provided through the constituent councils, as set out in the draft Procedure Rules.

**8.0 Equalities considerations:**

8.1 None.

**9.0 Financial considerations:**

9.1 Any costs can be subsumed by the relevant host council, or where appropriate shared across the constituent authorities.

**10.0 Risk management considerations:**

10.1 A joint committee approach will ensure Fylde Coast involvement from members and officers.

**11.0 Ethical considerations:**

11.1 A joint committee approach would enhance democratic and political accountability.

**12.0 Internal/ External Consultation undertaken:**

12.1 Consultation has taken place with Leaders of the three Councils and the current directors of the Economic Development Company.

**13.0 Background papers:**

13.1 None.

**14.0 Key decision information:**

14.1 Is this a key decision? No

14.2 If so, Forward Plan reference number:

14.3 If a key decision, is the decision required in less than five days? No

14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed:

Date approved:

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1

18.2 **Date of Decision:**

**19.0 Reason(s) for decision:**

**19.1 Date Decision published:**

**20.0 Executive Members in attendance:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1



## **Appendix 2a: The Blackpool, Fylde and Wyre Economic Prosperity Board – Procedure Rules**

### **1.0 Purpose**

- 1.1 The purpose of the Economic Prosperity Board ('EPB') will be to bring together local authority partners in a robust, formally constituted arrangement which will help shape and drive economic development across the Fylde Coast. This will be undertaken by collaboration and mutual co-operation. The fact that some functions will be discharged jointly by way of these procedure rules does not prohibit any of the constituent authorities from promoting economic wellbeing in their own areas, independent of the Board.

### **2.0 Governance**

- 2.1 The EPB will act as a Joint Committee pursuant to powers under the Local Government Acts 1972 and 2000 and under the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.
- 2.2 The EPB will comprise of Blackpool Borough Council, Fylde Borough Council and Wyre Borough Council ("constituent authorities") and three co-opted members, one each from each constituent area. Any reference to 'executive', 'executive arrangements', 'executive function' or 'committee system' has the meaning given by Part 1A of the Local Government Act 2000.
- 2.3 The EPB is not a self-standing legal entity but is part of its constituent authorities. Any legal commitment entered into pursuant of a decision of the EPB must be made by all constituent authorities.
- 2.4 Political Proportionality rules will not apply to the EPB as so constituted.
- 2.5 The EPB may establish sub-committees or advisory groups, to undertake elements of its work, if required.
- 2.5 The EPB has powers delegated to it by the constituent authorities in the following areas:
- a) to review future governance requirements and delivery arrangements and how these can be best achieved on the Fylde Coast;
  - b) to have direct oversight of key economic growth focussed projects and initiatives that the EPB has influence over the funding of;
  - c) to have strategic oversight of other key growth focussed projects and initiatives across the Fylde Coast, and;
  - d) to lobby and carry out other activities that help achieve the promotion or improvement of economic wellbeing on the Fylde coast.

The EPB will not hold funds or monies on behalf of the constituent authorities.

2.6 Each constituent authority operating executive arrangements will be responsible for considering whether it is necessary [in order to comply with Access to Information legislation regarding the publication of agendas including Forward Plan requirements] to treat prospective decisions as 'key decisions' and/ or have them included in their Forward Plan. A constituent authority operating a committee system will apply its own local statutory procedures.

### **3.0 Remit**

3.1 The remit of the EPB will be to provide political and democratic accountability and in doing so:

- a) act as the key strategic forum for economic development issues on the Fylde coast and to make recommendations to the Lancashire Enterprise Partnership (LEP) and other bodies on economic development investments and other priorities;
- b) have insight and the opportunity to review the LEP Board's activities and consider any further measures necessary to strengthen the relationship with the LEP Board;
- c) co-ordinate and monitor investment plans of the constituent authorities pertaining to economic growth at the discretion of the individual authorities;
- d) act as the Programme Board for Hillhouse Technology and Blackpool Airport Enterprise Zones (EZ's) and report into the LEP and its EZ Governance Committee as appropriate;
- e) seek to ensure that adequate resources are made available to enable the delivery of Hillhouse Technology and Blackpool Airport EZs and other key Fylde coast economic development priorities and projects;
- f) actively engage with a range of businesses on the Fylde coast in relation to economic development decision making and to engage with other stakeholders where appropriate;
- g) consider and advise on the appropriateness and viability of alternative, successor economic governance arrangements, and;
- h) co-ordinate and agree wider place-making policy within the Fylde coast economic footprint, wherever possible.

### **4.0 Membership**

4.1 Membership will consist of one member from each constituent authority. Such member to be the Leader of the Council or other executive member, in an authority operating executive arrangements (or Leader of the Council or committee chairman, or vice chairman from a council operating committee system arrangements) and for the purposes of these procedure rules, this member will be known as the 'principal member'.

- 4.2 Each principal member to have a named substitute member who must be an executive member where the authority operates executive arrangements. Where governance in a constituent authority is by a committee system form of governance, that substitute member shall be as per that authority's rules of substitution. All constituent authorities must provide no less than twenty four hours' notice to the Secretary where a substitute member will be attending in place of the principal member. Regardless of any such notification, where both the principal member and the substitute member attends a meeting of the EPB, the principal member shall be deemed as representing their authority.
- 4.3 In the event of any principal member of the EPB ceasing to be a member of the constituent authority which appointed him/her, the relevant constituent authority shall as soon as reasonably practicable appoint another principal member in his/her place.
- 4.4 Each constituent authority may remove its principal member or substitute member and appoint a different member or substitute as per that authority's rules of substitution and by providing twenty-four hours' notice to the Secretary.
- 4.5 There will be co-opted members appointed to the Board, with the number of co-opted members being the same as the number of constituent authorities. Each co-opted member will represent their relevant constituent area and the appointment and term of office of these co-opted members will be determined by formal decision of the Board. There are no substitute arrangements for co-opted members.
- 4.6 Each constituent authority may individually terminate its membership of the EPB by providing six months' written notice of its intent to leave the EPB to the Secretary. At the end of these six months, but not before, the authority will be deemed to no longer be a member of the EPB.
- 4.7 Where an authority has previously terminated its membership of the EPB it may re-join the EPB with immediate effect on the same terms as existed prior to its departure, where the EPB agrees to that authority re-joining via a majority vote.
- 4.8 Any other qualifying authority seeking to be a constituent member, may join the Board with immediate effect on the terms set out in these procedure rules, where the EPB agrees to that authority joining via a majority vote.
- 5.0 Quorum**
- 5.1 The quorum shall be two constituent authority members and one co-opted member with a requirement that each of the three authority areas be represented (either an authority member or co-opted member from each constituent area must be present). Should the constituent authorities change in number the quorum will be increased to reflect the change, the precise arrangements to be determined by agreement. No business will be transacted at a meeting unless a quorum exists at the beginning of a meeting. If at the beginning of any meeting, the Chairman or Secretary after counting the members present declares that a quorum is not present, the meeting shall stand adjourned.

## **6.0 Chairman and Vice Chairman**

- 6.1 The chairmanship of the EPC will rotate annually between each of the principal members. The Chairman or in his/her absence the Vice-Chairman (if one is appointed) or in his/her absence the member of the EPB elected for this purpose, shall preside at any meeting of the EPB.
- 6.2 Appointments will be made for a maximum period not extending beyond each principal member's remaining term of office as a councillor.
- 6.3 Where, at any meeting or part of a meeting of the EPB both the Chairman and Vice Chairman (if appointed) are either absent or unable to act as Chairman or Vice Chairman, the EPB shall elect one of the principal members of the EPB present at the meeting to preside for the balance of that meeting or part of the meeting, as appropriate. For the avoidance of doubt, the role of Chairman and Vice-Chairman (if appointed) vests in the principal member concerned and in their absence the role of Chairman or Vice-Chairman (if appointed) will not automatically fall to the relevant constituent Authority's substitute member.

## **7.0 Voting**

- 7.1 The EPB's decision making will operate on the basis of mutual co-operation and consent and will take into account the views of the co-opted members. It is expected that decisions will be taken on a consensual basis wherever possible. Where a formal vote is required it shall be one vote for each constituent authority, made by the principal member, or in their absence, their nominated substitute. Co-opted members are not permitted to have a vote.
- 7.2 All questions shall be decided by a majority of the votes of the members present, the Chairman having the casting vote in addition to his/her vote as a member of the Committee. Voting at meetings shall be by show of hands.
- 7.3 Where immediately after a vote is taken at a meeting, if any member so requests, there shall be recorded in the minutes of the proceedings of that meeting whether each person cast his/ her vote for or against the matter or whether he/ she abstained from voting.

## **8.0 Hosting, Administration and Lead Authority**

- 8.1 The EPB will be hosted by each constituent authority in turn, with the rota determined by a formal decision of the Board and the host authority's Monitoring Officer shall be Secretary to the Board ('the Secretary') (the position may be taken by a representative on their behalf). The Host Authority will also identify representatives to provide relevant financial, governance and legal advice to the EPB. For the avoidance of doubt, the Monitoring Officer of the host authority shall be 'Proper Officer' for the purposes of publishing the agendas, background papers and recording decisions. The historic official records of the EPB will pass to each host authority. The administrative costs of supporting the Board will be met equally by the constituent authorities, with each authority being responsible for receiving and paying any travel or subsistence claims from its own members, or co-opted members representing that area.
- 8.2 A 'Lead Authority' will be appointed by a formal decision of the EPB to deliver the economic development functions delegated to the Board. This Lead Authority, may be the same as the Host Authority, or may be another constituent authority.

8.3 The functions of the Secretary shall be:

- a) to maintain a record of membership of the EPB and any sub-committees or advisory groups appointed;
- b) to summon meetings of the EPB or any sub-committees or advisory groups;
- c) to prepare and send out the agenda for meetings of the EPB or any subcommittees or advisory groups; in consultation with the Chairman and the Vice Chairman of the Board (or sub-committee/ advisory group);
- d) to keep a record of the proceedings of the EPB or any sub-committees or advisory groups, including those in attendance, declarations of interests and to publish the minutes;
- e) to take such administrative action as may be necessary to give effect to decisions of the EPB or any sub-committees or advisory groups, and;
- f) to perform such other functions as may be determined by the EPB from time to time.

**9.0 Meetings**

9.1 The EPB will meet no less than quarterly, unless the EPB formally decides otherwise.

9.2 Meetings will be held at such times, dates and places as may be notified to the members of the EPB by the Secretary, being such time, place and location as the EPB shall from time to time resolve. Meeting papers will be circulated five clear working days in advance of any meeting.

9.3 The Chairman may choose to accept or reject urgent items that are circulated in a shorter timescale or tabled at any meeting. Any such urgent items will be by reason of 'special circumstances' and will be specified in the minutes, as to the reason the Chairman is of the opinion that the item should be considered as a matter of urgency.

9.4 'Special circumstances' justifying an item being considered as a matter of urgency will relate to both why the decision could not be made at a meeting allowing proper time for inspection by the public as well as why the item or report could not have been available five clear days before the meeting.

9.5 Additional ad hoc meetings may be called by the Secretary, after consultation, where practicable, with the Chairman and Vice Chairman of the Committee (if one is appointed), in response to receipt of a request in writing, which request sets out an urgent item of business within the functions of the EPB, addressed to the Secretary:

- (a) from and signed by two members of the EPB, or
- (b) from the Chief Executive of any of the constituent authorities.

- 9.6 The Secretary shall settle the agenda for any meeting of the EPB after consulting, where practicable, the Chairman or in their absence the Vice Chairman (if one is appointed); and shall incorporate in the agenda any items of business and any reports submitted by:
- (a) the Chief Executive of any of the constituent authorities;
  - (b) the officers responsible for legal, governance, finance and economic development at any of the constituent authorities;
  - (c) any Member of the EPB.

9.7 The EPB shall, unless the person presiding at the meeting or the EPB determines otherwise in respect of that meeting, conduct its business in accordance with these procedure rules.

#### **10.0 Access to Information**

10.1 Meetings of the EPB will be held in public except where confidential or exempt information, as defined in the Local Government Act 1972, is being discussed. Only members of the EPB and relevant advising officers from the constituent authorities and any person referred to in paragraph 11.2 below, will be permitted to be present for such items.

10.2 These rules do not affect any more specific rights to information contained elsewhere under the law.

10.3 The Secretary will ensure that the relevant legislation relating to access to information is complied with. Each constituent authority is to co-operate with the Secretary in fulfilling any requirements.

10.4 Any Freedom of Information Act requests received by the EPB should be directed to the relevant constituent authority for that authority to deal with in the usual way, taking account of the relevant legislation. Where the request relates to information held by two or more constituent authorities, they will liaise with each other before replying to the request.

#### **11.0 Attendance at meetings**

11.1 The Chairman may invite any person, whether a member or officer of one of the constituent authorities or a third party, to attend the meeting and speak on any matter before the EPB.

11.2 Where agenda items require independent experts or speakers, the officer or authority proposing the agenda item should indicate this to the Secretary and provide the Secretary with details of who is required to attend and in what capacity. The participation of independent experts or speakers in EPB meetings will be subject to the discretion of the Chairman.

## **12.0 Order of Business**

- 12.1 Subject to paragraph 12.2, the order of business at each meeting of the EPB will be:
- i. Apologies for absence
  - ii. Declarations of interests
  - iii. Approve as a correct record and sign the minutes of the last meeting
  - iv. Matters set out in the agenda for the meeting which will clearly indicate which are key decisions and which are not and which items are subject to 'call in', in accordance with procedure rule 18.1.
  - v. Matters on the agenda for the meeting which, in the opinion of the Secretary are likely to be considered in the absence of the press and public.
- 12.2 The person presiding at the meeting may vary the order of business at the meeting.

## **13.0 Codes of Conduct and Disclosable Pecuniary Interests**

- 13.1 Principal members of the EPB (and their substitute members) are governed by the provisions of their own Council's Codes and Protocols including the code of conduct for members and the rules on Disclosable Pecuniary Interests. Co-opted members are governed by the code of conduct for members of the 'Lead Authority'.

## **14.0 Minutes**

- 14.1 There will be no discussion or motion made in respect of the minutes, except as to their accuracy. If no such question is raised or if it is raised then as soon as it has been disposed of, the Chairman shall sign the minutes.

## **15.0 Role of the Chairman**

- 15.1 A Member wishing to speak shall address the Chairman and direct their comments to the question being discussed. The Chairman shall decide the order in which to take representations from members wishing to speak and shall decide all questions of order. His/her ruling upon all such questions or upon matters arising in debate shall be final and shall not be open to discussion.
- 15.2 The Chairman shall have the discretion to regulate the behaviour of all individuals present at the meeting in the interests of the efficient conduct of the meeting, including excluding members of the press and public in the event of a disturbance.

## **16.0 Motions / Amendments**

16.1 A motion or amendment shall not be discussed unless it has been proposed and seconded. When a motion is under debate no other motion shall be moved except the following:

- i. To amend the motion
- ii. To adjourn the meeting
- iii. To adjourn the debate or consideration of the item
- iv. To proceed to the next business
- v. That the question now be put
- vi. That a member be not further heard or do leave the meeting
- vii. To exclude the press and public under Section 100A of the Local Government Act 1972.

## **17.0 Application to Sub-Committees**

17.1 These procedure rules shall apply to meetings of any sub-committees of the EPB.

## **18.0 Scrutiny of decisions**

18.1 Decisions of the EPB which relate to the executive functions of a constituent authority will be subject to scrutiny and 'call-in' arrangements (or any other arrangements equivalent to 'call-in' that any constituent authority operating a committee system, may have). This would only apply where the decision is one which could have been made locally by that constituent Authority acting alone. No decision in this circumstance shall be implemented until the call-in period has either expired or if 'called-in' the matter concluded, in accordance with the call-in procedures of the relevant constituent Authority.

## **19.0 Winding up of the EPB**

19.1 The EPB may be wound up immediately by a unanimous vote of all constituent authorities.

## **20.0 Amendment of these Procedure Rules.**

20.1 These Procedure Rules can only be amended by unanimous resolution of the EPB, following the consideration of advice from the Monitoring Officers of each of the constituent authorities.



<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Alan Cavill, Director of Place
<b>Relevant Cabinet Member</b>	Councillor Fred Jackson, Cabinet Member for Environmental Services and Highways
<b>Date of Meeting</b>	6 November 2017

## LOCAL TRANSPORT PLAN

### 1.0 Purpose of the report:

- 1.1 To consider recommending Council to approve an extension of the time period for the current Local Transport Plan and start the process of refreshing the Local Transport Plan.

### 2.0 Recommendation(s):

- 2.1 To recommend the Council to extend the Local Transport Plan strategy, 2011 to 2016, until April 2018.
- 2.2 Subject to the approval 2.1 above, to recommend Council to delegate authority to the Director of Place to make minor amendments to the Local Transport Plan document as necessary and publish the plan.
- 2.3 To note the work already undertaken in refreshing the Local Transport Plan and that an updated Implementation Plan will also be produced for approval next year.

### 3.0 Reasons for recommendation(s):

- 3.1 Blackpool Council is required to have an Local Transport Plan in place. Continuing with the current plan enables continuity while a refresh of the plan is undertaken.
- 3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No
- 3.2b Is the recommendation in accordance with the Council's approved budget? Yes
- 3.3 Other alternative options to be considered:

None.

#### **4.0 Council Priority:**

4.1 The relevant Council Priority is “The economy: Maximising growth and opportunity across Blackpool”

#### **5.0 Background Information**

5.1 Blackpool Council is required to have a Local Transport Plan in place. The current Local Transport Plan expired on 31 March 2016, being extended as noted above in paragraph 1.1. To enable the Council to meet its statutory requirements and also to review fully the plan for the future, it is proposed to extend life of the current document for a further year so a new plan can be prepared that takes account of:

- Blackpool Local Plan, Part 1: Core Strategy (2012-2027), adopted January 2016.
- the Blackpool Strategic Parking Review being produced by consultants AECOM for the Council.
- the Fylde Coast Highways and Transport Masterplan, July 2015, produced jointly with Lancashire County Council
- Any Department for Transport guidance that becomes available.

5.2 The current Local Transport Plan was approved by Executive in March 2011 (EX27/2011) and is attached in amended form as an appendix. In view of the continuing uncertainty around a possible combined authority, an Local Transport Plan pertaining to Blackpool’s transport needs solely will be prepared.

5.3 The plan identified six key issues: highway maintenance, road safety, congestion, visitor economy, parking and accessibility, which remain valid. Strategic objectives had been devised to address the issues that had been identified and the strategy described how the challenges would be met over the five-year Local Transport Plan period. It is proposed to continue with these priorities for a further year to enable continuity while seeking to deliver a new Local Transport Plan for 2018-2023, with its associated implementation plan. A new plan will enable the emerging regeneration position to be considered from the transport needs perspective within the new plan, including the new conference centre, leisure quarter development and possible employment hub.

5.4 Blackpool was required to develop a new Local Transport Plan (LTP) to be in place for the year 2016, which would be sent to the Department for Transport (DfT). At the Council meeting of 29 June 2016, it was determined that the current plan approved in March 2011 would be extended for a further year.

5.5 Over the intervening period, no further guidance on Department for Transport's expectations for a new plan has been released. Also there has been uncertainty regarding the combined authority proposal, possibly involving a joint Local Transport Plan with Lancashire County Council and Blackburn with Darwen Council.

5.6 In the light of this, it has not been possible to prepare a new Local Transport Plan to take effect during 2017 and it is therefore proposed that the March 2011 Local Transport Plan with its associated Implementation Plan be extended for a further year to April 2018 as work to refresh the current strategy is underway.

5.7 **Is the Corporate Delivery Unit aware of this report?** Yes

The Corporate Delivery Unit has been involved in the production of this report and has accepted the rationale behind the extension of the Local Transport Plan. It has been agreed that the Corporate Delivery Unit will be integral in the development of the revised Plan.

5.8 Does the information submitted include any exempt information? No

5.9 **List of Appendices:**

Previously approved Local Transport Plan 2011-2016 (amended to 2018)

6.0 **Legal considerations:**

6.1 None.

7.0 **Human Resources considerations:**

7.1 None.

8.0 **Equalities considerations:**

8.1 None.

9.0 **Financial considerations:**

9.1 None.

10.0 **Risk management considerations:**

10.1 None.

**11.0 Ethical considerations:**

11.1 None.

**12.0 Internal/ External Consultation undertaken:**

12.1 Consultation took place before the initial approval of the Local Transport Plan and extensive consultation is planned for its refresh.

**13.0 Background papers:**

13.1 None.

**14.0 Key decision information:**

14.1 Is this a key decision? Yes

14.2 If so, Forward Plan reference number: 7/2017

14.3 If a key decision, is the decision required in less than five days?

14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: 27 October 2017 Date approved: N/A

**17.0 Declarations of interest (if applicable):**

17.1 None

**18.0 Executive decision:**

18.2 **Date of Decision:**

**19.0 Reason(s) for decision:**

19.1 **Date Decision published:**

**20.0 Executive Members in attendance:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1

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B L A C K P O O L C O U N C I L



# Local Transport Plan Strategy, 2011 to 2018

April 2011



INVESTOR IN PEOPLE

Building a better community for a



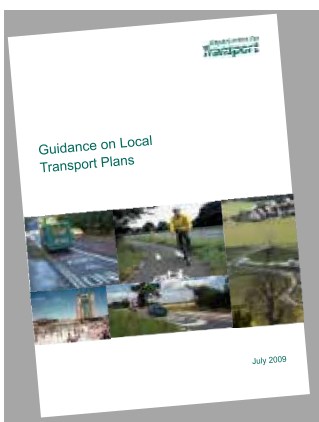


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## 1. Introduction



**1.01** This is the strategy component of Blackpool's third Local Transport Plan (LTP), which covers the period 2011/12 to 2015/16.

### Local Transport Plan requirement

**1.02** The Department for Transport's (DfT's) July 2009 Guidance on Local Transport Plans states: "Good transport is a vital factor in building sustainable local communities. It contributes to the achievement of stronger and safer communities, healthier children and young people, equality and social inclusion, environmental objectives and better local economies. Where transport fails, these aspirations are put at risk." This document has been produced in accordance with this guidance.



**1.03** All English transport authorities (outside London) are required by statute to produce an LTP, setting out the authority's transport policies and objectives, and a plan to implement them. Blackpool Council's second LTP (March 2006) expired in March 2011. The DfT's guidance explains the LTP policy context; plans should align with the five National Transport Goals:

- i support Economic Growth
- i reduce Carbon Emissions
- i promote Equality of Opportunity
- i contribute to better Safety, Security and Health
- i improve Quality of Life and a Healthy Natural Environment

**1.04** The Local Transport Act 2008 amended the LTP process to provide more flexibility for local transport authorities in developing their transport strategies. Government no longer assess LTPs, but require local transport authorities (Blackpool Council being one) to prepare a strategy bringing local priorities together, linked to corporate policies and partnerships.

**1.05** In January 2011 the Government published its transport White Paper 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen'. This paper has been produced to assist local authorities in meeting two key government objectives: creating growth in the economy by improving accessibility and cutting carbon emissions by encouraging smarter ways to get around. It targets the short-distance local trip where the biggest opportunity exists for people to make sustainable travel choices and improve their health and quality of life. The Government have set aside £560m over four years for the Local Sustainable Transport Fund. Local transport authorities can bid for this funding to develop value-for-money schemes that are economically, socially and environmentally sustainable.

**1.06** The LTP is the key vehicle for setting out transport policy and delivering it at the local level. It comprises this Strategy and a separate Implementation Plan that covers financial years 2011/12-2014/15. The LTP is for Blackpool, but has a Fylde Coast sub-regional (see Figure 1) and national perspective. Cross-boundary linkage to neighbouring Fylde and Wyre boroughs is important; Lancashire County Council (LCC) is the transport authority for both of these districts.

Figure 1 - Blackpool and the Fylde Coast



1.07 Blackpool Council has co-operated with the two other Lancashire transport authorities, Blackburn with Darwen Borough Council (BwDBC) and LCC on developing the 'Sub-regional Transport Framework for Lancashire' that has informed LTP development in the three areas.

#### **LTP achievements to date**

1.08 During the first LTP period, 2001/02 to 2005/06, notable achievements included:

- i improved travel choices (by bus, walking and cycling);
- i tangible support for Blackpool's regeneration;
- i keeping the Tramway open;
- i rising bus patronage; and
- i a fall in road-related casualties.

1.09 The second LTP, 2006/07 to 2010/11, consolidated these achievements and helped bring forward the following initiatives:

- i the full upgrade of the Tramway (to 2012);
- i a fully ITSO compliant smartcard;
- i Cycling Towns status;
- i improved access to Blackpool Business Park; and
- i transformation of the district centres at Layton and on Waterloo Road.

1.10 The economic and policy context has changed significantly in recent years, which crucially affects the context within which Blackpool Council will seek to deliver its third LTP.

## *Sustainable Community Strategy*

1.11 This LTP is consistent with Blackpool's vision (contained in the council's Sustainable Community Strategy and Corporate Plan) of being: 'A great place to visit, an even better place to live.' The Transport Strategy that will be delivered will help realise this vision by meeting Blackpool's five Corporate Goals:

- i Improve Blackpool's economic prosperity – creating local jobs and opportunities for local people
- i Develop a safe, clean and pleasant place to live, work and visit
- i Improve skill levels and educational achievement
- i Improve the health and well-being of the population
- i Ensure Blackpool Council is an efficient and high performing organisation

1.12 The Corporate Plan is the council's main strategic plan, setting out how the authority will contribute to the delivery of the Sustainable Community Strategy. Transport plays a key role in supporting corporate actions, to substantially improve the town centre and main resort areas. Improved infrastructure and good multi-modal accessibility is vital to support the visitor economy and re-establish Blackpool as the centre of choice for Fylde Coast residents. The LTP has and will continue to support these and other corporate objectives, such as reducing the causes of Climate Change and encouraging healthy lifestyles.

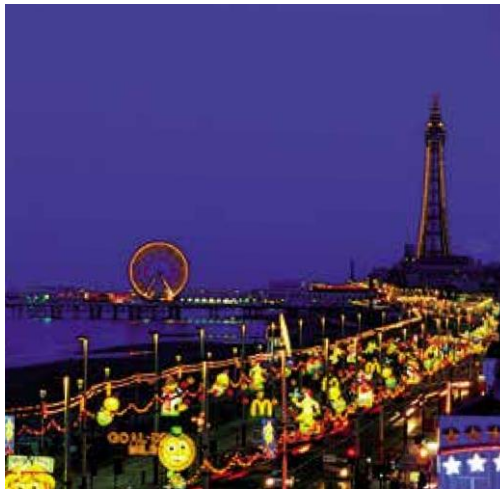


## Local Development Framework

**1.13** Blackpool Council has developed a Core Strategy as part of its Local Development Framework (LDF), which will address the inter-related issues of better connectivity, a revitalised visitor economy, transformation of the town centre, safer and healthier neighbourhoods, and environmental quality and impact. This is consistent with the vision of the Sustainable Community Strategy for Blackpool “to have a prosperous, vibrant, high quality, all year round economy; generating healthier, better skilled and educated communities, enjoying a safer and more pleasant place.” Alongside the LTP, the Core Strategy is addressing the key issue of “making a better connected Blackpool with easy access and an integrated and sustainable pedestrian and transport network.”

**1.14** The following are relevant extracts from the Core Strategy’s Spatial Vision: “New homes and jobs will be provided in sustainable locations to meet the community’s needs and support regeneration. Neighbourhoods will be enhanced in appearance with good access to shopping, health, recreation, open space and other facilities to meet community needs. Inner Blackpool will be transformed into a place offering a mix of aspirational and affordable housing within mixed, attractive neighbourhoods, with access to quality local services. Higher quality developments will promote pride in the town and provide focus within a visually attractive, safe urban environment. An integrated transport system will provide safe, healthy and easy access across Blackpool and the Fylde Coast. Areas of urban or natural quality throughout the New Blackpool will be conserved and enhanced”.

**1.15** To achieve the Spatial Vision, there are four spatial objectives which the council will seek to achieve by 2026. The Core Strategy Preferred Option is for “Sustainable regeneration, diversification and growth” which is about “maximising regeneration” and “providing supporting growth” in a “balanced, healthier and greener Blackpool” to deliver future needs.



**1.16** The LTP is consistent with and will support draft Core Strategy policies:

- i Strategic Direction and Location of Development;
- i City on the Beach;
- i Phased and Balanced Blackpool Housing Market;
- i Employment Development and Economic Diversification;
- i Quality of Place;
- i Climate Change and Sustainable Development;
- i Connectivity;
- i Resort Renaissance;
- i Arrival and Movement;
- i Blackpool Town Centre Strategy;
- i Talbot Gateway Strategic Town Centre Site;
- i Former Central Station/Promenade Strategic Town Centre Site;
- i Key Resort Gateways;
- i Town-wide Shopping and Community Facilities;
- i Green Infrastructure;
- i Planning Obligations; and
- i policies that relate to ‘South Blackpool Growth’, development close to junction 4 of the M55 motorway.

## *An introduction to Blackpool*

**1.17** Blackpool is a Lancashire resort town with a resident population of 140,000; it comes under the jurisdiction of Blackpool Council which is a unitary authority. It is at the heart of the Fylde Coast, which has a total population of approximately 300,000. Blackpool's resident population is swelled by visitors; there are estimated to be in the region of 10,000,000 visits per annum and importantly visitor numbers are increasing. Across the Fylde Coast, Blackpool is an important destination for shopping and employment. Car ownership amongst the resident population is relatively low; the 2001 census showed 37% of households do not have access to a car.

**1.18** Blackpool is densely populated and predominantly urban; deprivation and poor health are key issues for parts of the town and a significant proportion of the resident population. The tourism-dominated economy places untypical demands on the transport network, especially at bank holidays and during school holidays. The town is regenerating and hopes to attract more visitors with new and better attractions. The Winter Gardens and South Pier are being renovated; the seafront and Promenade are being transformed; and new attractions are opening at the Pleasure Beach, the Tower and the Zoo. 'Brilliance', a light and music display, on Birley Street has enhanced the Blackpool Illuminations offer and the new Houndshell shopping centre has substantially improved the retail offer in Blackpool Town Centre.

**1.19** Regional connectivity is important to Blackpool due to its visitor-dependent economy and relatively peripheral location. It is connected to the M55 motorway (managed and maintained by the Highways Agency), is on the rail network and is served by a regional airport. Coach and rail travel are economically important, as are connecting taxi services.



The town has a good local bus network and is building on its Cycling Town status. The Blackpool - Fleetwood Tramway is undergoing wholesale renewal; the new trams operating from 2012 will run jointly with reconditioned heritage trams, adapted for better access.

## *Transport's importance in context*

**1.20** Transport enables economic and social activity, helping people to get to jobs and services and to visit people and places. It allows businesses to access suppliers and customers. However, transport also impacts upon people and places; traffic congestion causes delay; road collisions cause injury and death; and vehicle emissions affect people's health and contribute to Climate Change. It is recognised that an effective transport network is crucial to achieving local and national social, economic and environmental goals. Also, projected rises in fuel costs are likely to strongly influence future travel patterns.

## Blackpool's transport challenges

1.21 Blackpool Council has identified important issues that the LTP will address; in summary these are:

- i Highway maintenance, addressing the state of Blackpool's roads, bridges and footways.
- i Road safety, in particular a high child casualty rate.
- i Congestion and its impact on the local economy.
- i How transport systems can support the local visitor economy.
- i Parking issues, at several locations in the borough.
- i Access to healthcare, education, employment and other important destinations.
- i The need to reduce greenhouse gas emissions and improve local air quality.
- i The need to improve the health of the local and visitor population.
- i The need to change peoples' behaviour in relation to travel and transport.

1.22 Developing a more sustainable and efficient transport network will enable economic growth and deliver opportunities for all. Furthermore, tackling transport's adverse impact on personal health, safety and the quality of the local environment will assist Blackpool's LTP delivery. It is vital that the best use is made of existing transport networks; effective maintenance and management are fundamental to achieving this.

1.23 Blackpool's sense of place and distinctiveness needs to be preserved and enhanced. High quality design and maintenance is important for new and existing infrastructure, creating safe, pleasant and welcoming places for residents and visitors. Superfluous signs and street furniture detract from the character of Blackpool's urban form. It is important that the council takes account of future climatic conditions when planning and delivering new transport projects and when planning maintenance regimes for existing transport infrastructure.

## Connectivity in Blackpool

1.24 Good transport for all users is vital for Blackpool's social, economic and environmental well-being. Road, rail, tram and air links provide the mainstay of Blackpool's infrastructure. These are supported by a comprehensive network of footways, Public Rights of Way (PRoW) and an increasing number of off-road cycle routes.

## Road

1.25 Good road links are needed to support Blackpool's visitor economy and local jobs and services. For visitors, the M55 is a key strategic link providing access to Blackpool via Progress Way and Squires Gate Lane; Yeadon Way and Seasiders Way; and Preston New Road. These key routes allow car and coach access to the resort. The challenge is to ensure the routes are clearly signed, well maintained and have effective traffic management in place, enhancing the visitor experience by directing them efficiently to the most appropriate parking for their attractions of choice.





1.26 Blackpool's strategic road network is comprised mainly of east-west and three main north-south links. These routes have to be capable of accommodating all transport modes in an efficient and equitable way. There are significant demands from Fylde Coast drivers particularly during school term times. The car is the dominant travel mode in Blackpool. Journey times can be slow and unreliable, particularly on north-south routes during the tourist season. There is limited scope and space for capacity enhancements; congestion impacts upon journey reliability, air quality and bus service reliability. A large number of visitors arrive in Blackpool by coach. Neither Talbot Road nor Lonsdale Road coach stations offer coach operators or their passengers with the quality of facilities that would be expected in a resort of Blackpool's size and status. Reception facilities for coaches in Blackpool are relatively poor, both in terms of drop-off and pick up points, and coach parking for staying groups.

1.27 There are three areas in the town centre where buses and taxis have priority although it is acknowledged that enforcement of traffic regulation orders needs to improve. It is proposed that bus priority enhancements are piloted on the Lytham Road corridor with a view to a wider role-out across the borough. There are facilities for pedestrians and cyclists at signal-controlled junctions and crossings, many of these are being upgraded as part of a Private Finance Initiative (PFI), which is also renewing most of the street lighting in the borough. There is a comprehensive footway network, but much of this requires maintenance. Cycling Towns has given Blackpool four east-west 'explorer' routes, connected to off-road provision on the traffic-free Promenade and in Stanley Park. The programme is expected to increase levels of cycling in the town, helping to tackle congestion and improve health. Elsewhere, the challenge is to accommodate cyclists safely on the highway network. Road condition is an issue for all road users.

### Rail

1.28 Presently there are relatively poor links to the national rail network. Network Rail's project to electrify the line from Blackpool North to Preston and on to Manchester will help address this deficiency. This will facilitate rail services to major UK cities and the potential to increase rail's modal share, taking pressure off the inter-urban road network.

1.29 The line from Blackpool South connects to Lytham St Anne's joining the north line west of Kirkham and Wesham. Also known as the South Fylde Line, this line is single track. To increase service frequency a passing loop would be required. The council has supported a Community Rail Partnership that promotes this line.

### Tram

1.30 A successful Major Scheme Bid to the DfT has resulted in funding to comprehensively upgrade the Blackpool - Fleetwood Tramway. The new system will be operational from 2012. The challenge will be to realise the system's potential to encourage transfer from car on north-south routes, reducing congestion and pollution. Also, to build on the SINTROPER tram-train pilot, looking at light rail connectivity between the tramway and the heavy rail network.

### Air

1.31 Blackpool International Airport, a regional asset, is located to the south of Blackpool. Over the last few years passenger numbers have been in decline. The challenge is to reverse this trend, establishing a thriving regional airport that supports the local economy. The council will support the airport in raising its profile. An expanded airport needs better public transport connectivity to reduce localised congestion and pressure for parking.



## 2. Challenges, Goals and Objectives

**2.01** Identifying the challenges facing Blackpool and the Fylde Coast sub-region are a vital component of this LTP. Close co-operation with the other Lancashire transport authorities has helped identify these transport-related challenges and goals. The council has built on this joint working by highlighting the key issues that need to be addressed in Blackpool over the plan period. Strategic objectives have been set to address the challenges and issues identified.

### Lancashire Transport Framework

**2.02** The 'Sub-regional Transport Framework for Lancashire' was commissioned by the Lancashire Economic Partnership and the three transport authorities. This followed close working on strategic transport issues through the Lancashire Connectivity Group. The overall aim of the transport framework was to identify action necessary to deliver the economic priorities for Lancashire. The project improved understanding of the existing and potential links between transport and Lancashire's economy and established a policy framework to systematically address issues identified.



**2.03** A transport vision was developed: "Transport in Lancashire will have a key role in helping to make Lancashire a great place to live, work and play." This took on board transport's role as an enabler for economic and social activity against transport's negative impact on Climate Change, people's health, road safety and the quality of the built environment. Hence: "Transport will help in building a sustainable future, based on the principles of connectivity, supporting a competitive economy and meeting the needs of Lancashire's residents. This will mean changing travel behaviour to support a lower-carbon economy, and movement networks that are safer, more secure and more supportive of thriving communities."

**2.04** The vision was supported by specific transport goals, framed around the National Transport Goals. In a Blackpool context, these are as follows:

- i Competitiveness and growth – manage and improve transport as one of the elements to enable new jobs to be attracted, tackle the 'productivity gap' and secure a strong economic future.
- i Climate Change – reduce carbon emissions from transport to enable Blackpool to play its role in contributing to UK carbon targets.
- i Equality of opportunity – build strong communities by enabling the people of Blackpool, particularly the most vulnerable in society, to access education, employment, health and public services.
- i Health, safety and security – tackle the negative impacts of mobility, by reducing accidents, improving personal security, promoting physical activity and improving air quality.
- i Quality of life and natural environment – manage movement in Blackpool to support improved quality of life through tackling noise, reducing severance and creating liveable communities.



## Challenges identified during joint working



**2.05** Building on the Lancashire Transport Framework, joint working with LCC and BwDBC identified challenges under each of the five National Transport Goals (see paragraph A.4, Appendix A). The following challenges are considered to be particularly important in Blackpool:

- i The car plays the dominant role for travel to work. In urban areas car dependency presents problems of traffic congestion and reduced air quality, contributing to Climate Change.
- i Existing bus networks do not provide adequate access to more recently developed employment areas, necessitating high car-commuting levels and acting as a barrier to employment for car-less households.
- i The visitor economy and its future development are crucial. This will require better transport networks, both strategic connectivity from the rest of the UK and local travel as part of the visitor experience.

**2.06** Public and stakeholder consultation in mid 2010 identified the following as the biggest sub-regional challenges (shown in full at Appendix A):

- i High car dependency.
- i Road casualties, particularly child road casualties.
- i Vandalism and anti-social behaviour, particularly on public transport.
- i The fear of crime, particularly at night.
- i High levels of carbon emissions.
- i Growing the economy and providing access to jobs.
- i A highway network that makes travel and transport difficult.
- i The fear of traffic which deters people from walking and cycling.

- i Low quality streets and footways, which reduce quality of life and make journeys difficult.
- i A growing ageing population with specific transport needs.

## Lancashire's Transport Goals

**2.07** LCC's Transport Goals are relevant in Blackpool:

- i To help to secure a strong economic future by making transport and travel more effective and efficient, and by improving sub-regional links.
- i To reduce the carbon impact of Lancashire's transport requirements, whilst delivering sustainable value for money transport options to those who need them.
- i To provide all sections of the community with safe and convenient access to the services, jobs, health, leisure and educational opportunities that they need.
- i To improve the accessibility, availability and affordability of transport as a contribution to the development of strong and cohesive communities.
- i To create more attractive neighbourhoods by reducing the impact of transport on quality of life and by improving the public realm.
- i To make walking and cycling more safe, convenient and attractive, particularly in the more disadvantaged areas of Lancashire bringing improvement in the health of Lancashire residents.
- i To provide value for money by prioritising the maintenance and improvement of Lancashire's existing transport infrastructure where it can help to deliver the transport goals.

2.08 The three top priorities identified in Lancashire (in terms of urgency and importance) also resonate in Blackpool:

- i Support economic growth, the creation of jobs and access to employment.
- i Improve child safety.
- i Maintain our transport asset.

### *Blackpool's Transport Vision*

2.09 'By 2016 Blackpool will have a well maintained and integrated transport network, which will be safer and more secure for all users. Journeys will be more reliable and less affected by congestion, which will contribute to sustained economic growth and a reduction in carbon emissions. There will be improved access to Blackpool by all transport modes to support the local economy, with more sustainable travel within the resort as part of an improved visitor experience. People will have more travel choices and better access to their destinations, particularly by walking, cycling and improved public transport, and will be healthier due to greater use of active travel options. Higher quality parking will be more efficient and effective in providing for the needs of residents and visitors.'

### *Blackpool's main transport issues*

2.10 The following six key issues have been identified during the development of this LTP. Consultation with the public and stakeholders has been an important part of the process.

#### *Highway maintenance*

2.11 Over the last decade there have been insufficient funds to maintain the condition of Blackpool's highway network in an acceptable and steady state; the roads are deteriorating at the same rate or a greater rate than they are being renewed. A high proportion of footways are also in a poor and deteriorating condition, leading to high costs for tripping claims. There

are maintenance issues with Blackpool's bridges, they are relatively old and many are deteriorating. The deteriorating highway network has an impact on visitors, residents and businesses in the town, affecting the local economy. The strategic road network (A, B and C roads) is currently deteriorating at 5% per annum. An extensive condition survey has shown that around 4% of strategic roads and 5% of their footways are life-expired and are in need of urgent repairs. A further 30% and 33% respectively will require repairs over the next four years. Only 36% of residential roads and 13% of residential footways are in good condition.



#### *Road safety*

2.12 Over recent years road traffic casualties have reduced significantly, however Blackpool still has one of the highest child casualty rates, per head of population, in the country. There are also issues with communicating the road safety message to harder to reach groups, for example young people. There is a causal link with deprivation, children in these areas are more vulnerable, a big issue in Blackpool. Speeding and rat running, two topical road safety related issues, impact upon residential amenity in the town. Following cuts to the road safety grant, the future of the Lancashire Partnership for Road Safety (with LCC and BwDBC) and camera enforcement is being discussed but will hopefully continue for the foreseeable future. To date, the Partnership has been effective in ensuring greater speed limit compliance, contributing to the reduction in casualties. The council will ensure that its Road Safety Strategy accords with the national strategy that is being published in early 2011 to ensure Britain's roads are amongst the safest in the world.

## Congestion

**2.13** Traffic congestion occurs at key junctions and their approaches, particularly during school term time and at visitor peaks. Blackpool has a distinct challenge; it must cater for visitors as well as local residents and workers. The transport network must be fit for purpose in catering for these different needs; there is a particular challenge when the peak travel demands for these groups coincide. Congestion and queuing for visitors can contribute to a poor experience of the resort and impact on repeat visits and economic performance. Unrealistic journey times have the potential to affect the local economy. The council monitors congestion levels on the network as part of its Traffic Management Act duty. With low car ownership and high levels of deprivation, there is potential for traffic to grow significantly, resulting in more 'endemic' congestion in some areas. High congestion levels affect the local economy; the resulting pollutants contribute to Climate Change and impact on local air quality. Blackpool's compact urban form means a lack of space to address network bottlenecks, notwithstanding funding constraints and the potential for induced traffic associated with capacity improvements. The trains serving both Blackpool North and Blackpool South railway stations can also be congested at tourist peaks, impacting upon the visitor experience.



## The visitor economy

**2.14** Visitors are the local economy's lifeblood and transport and travel is an integral part of the visitor experience. Most arrive by car; good access to car parks is important, as are the clear benefits of them not driving around the resort needlessly. Blackpool does not have a quality coach station; adequate facilities are provided but need improvement. The environment outside Blackpool North Railway Station is particularly poor, substantial improvements have been proposed as part of

the Talbot Gateway scheme. The older more traditional trams are visitor attractions in their own right; several are being modified to comply with the 2010 Equality Act and will run alongside the modern vehicles. There is a shortage of dedicated car parking at Blackpool Pleasure Beach, little at the Winter Gardens and none at Blackpool Tower. Premier regeneration schemes are predicated on re-providing car parking and improving its quality on-site, and off-site if necessary. There is a clear need to manage visitor traffic more effectively and also to improve visitors' experience of travelling within the resort by more sustainable modes to help the management of congestion and improve environmental quality.

## Parking

**2.15** Car parking usage and occupancy occurs on a large scale in Blackpool. Some car parks have been improved and remodelled but the majority have not; advanced directorial signage has been improved on the main access routes from the M55 but not on the approaches to Blackpool Town Centre. If the town is to maintain and increase the numbers of resort visitors and its town centre is once again to be the first choice destination for Fylde Coast residents (for retail and leisure) then it is essential that visitors, shoppers, investors and developers are not deterred by real or perceived inadequacies in its car parking provision, both on and off-street. The regeneration of Blackpool is heavily dependent upon attracting car-borne visitors, the associated demands on the highway network and parking facilities (both on- and off-street) need to be managed in the best possible way. It is important that the impact on the built environment and other components of Blackpool's transport system is minimised. There is a need to ensure Blackpool's existing parking facilities are used in the most efficient and effective way and set out a strategy for future provision, linked to development and regeneration.

## Accessibility

**2.16** Ensuring people can get to the facilities they need is an important issue. In Blackpool most problems occur for those accessing healthcare, education and employment. Bus route changes have meant direct access to Blackpool Sports Centre is now not possible. NHS Blackpool (the local Primary Care Trust), has overseen the construction of three new Primary Care Centres; different travel patterns and pressures on local parking have resulted. Revisions to local bus routes have meant students and staff travelling from the south of the borough to the Bispham campus (Blackpool and the Fylde College) and the Blackpool Sixth Form College have to change buses in the town centre. The town's main business and employment parks are located at the edge of the borough, meaning public transport provision is limited, with congestion and parking problems a consequence. Provision of cycling facilities at

developments has rarely been comprehensive and many bus services funded by developers have proved non-viable when the pump-priming period has ended. This has meant greater levels of car dependency and consequently more congestion and pollution. Apart from one major bus service serving Blackpool North railway station, there is no planned integration between bus and rail services in the town or direct connectivity between the railway and the tramway. The buses, trams and trains have different ticketing systems meaning limited opportunities for through ticketing. Affordability is an issue for some. Cycle and pedestrian routes have sometimes been provided in a piecemeal fashion and are not always direct or continuous. There is little public cycle parking at the town's railway stations and near tram stops. Most accessibility issues transcend the boundaries into neighbouring Fylde and Wyre boroughs, highlighting the need for joint working with LCC and the two district councils.



2.17 The following three supporting issues relate to the key issues above. They are also important in their own right, highlighted during consultation with stakeholders and the public.

### *Greenhouse gas emissions and air quality*

2.18 Climate Change is a global concern. The transport sector is a significant contributor of greenhouse gas emissions. Climate Change means more extreme and unpredictable weather events, affecting visitors and residents alike. Coastal Blackpool is susceptible to Climate Change effects. Reliably hotter weather would benefit the resort; conversely more windy and wet weather would be detrimental to the fragile local economy. Rougher seas would have a detrimental effect on the Promenade and its transport infrastructure; more wind and rain would contribute to rising congestion by deterring walking and cycling.



2.19 Blackpool has one Air Quality Management Area (AQMA) in the town centre, which was declared in 2005. Pollution levels are monitored continuously to determine the success of measures implemented through the resulting Air Quality Action Plan. An Updating and Screening Assessment was undertaken borough-wide in 2009, which showed no further AQMA designations necessary.

### *Health and well-being*

2.20 A significant health issue in Blackpool is the relatively low life expectancy; people's health is poor compared to the rest of the country, with significant spatial inequalities within the town. Health problems are exacerbated by poor diet, exercise levels and relative poverty. Over the last 10 years, the gap between the healthiest members of

society and the least healthy has increased and in the same period, the population has also become less active and more overweight. This has led to an inexorable rise in what can be described as 'diseases of 21st Century living': obesity, diabetes and depression. Active travel, primarily more walking and cycling, can replace exercise lost to more sedentary lifestyles and importantly can help improve physical and mental health. The long-term health benefits of instilling travel skills beyond driving are likely to be very significant.

2.21 The Marmot Strategic Review of Health Inequalities in England 2010 stated that active travel and public transport are recommended for reducing health inequalities and active travel should be improved across the social gradient. Low levels of fitness and health are a major concern and impact upon the quality of life and well-being experienced by Blackpool's residents. Modal shift to public transport, walking and cycling can also help to reduce traffic congestion and improve air quality; this can reduce respiratory disease. The transport needs of elderly and vulnerable people need to be addressed to help them play a full role in society. Fundamentally, people need to feel safe when travelling.

2.22 In November 2010, the Department for Health published its White Paper 'Healthy Lives, Healthy People: Our Strategy for Public Health in England'. Key networks have been established through the 'Public Health Responsibility Deal' thereby promoting collaborative working with business and the voluntary sector. The networks cover food, alcohol, physical activity, health at work and behaviour change. The LTP aims to improve access to fresh food, increase levels of active travel, improve health at work through travel planning measures and change travel behaviour to help achieve its strategic objectives.

## Travel behaviour

**2.23** People's behaviour has implications for Blackpool transport systems. Collisions, injuries and deaths on the roads are often caused by human error; with speed often a significant contributory factor. People with access to cars enjoy their convenience, even if the journey they are making is relatively short. They often prefer to travel alone rather than share. There are instances where people do not behave considerately. A high proportion of younger children in Blackpool are driven to school, in many cases as part of a linked journey, for example to work or to the shops. The use of the car is often given no second thought; the social, economic and environmental consequences of car use do not lead people's decision making. However, the cost of fuel is becoming a more pressing issue.

**2.24** Visitors enjoy direct access to the resort from the M55, which causes congestion at peak times. Parking has a significant land-take and is aesthetically unattractive (most parking is at surface level); the poor environment detracts from the visitor experience. Generally, car dependency results in congestion on strategic roads and as a consequence greenhouse gas emissions are higher. Blackpool's constrained road network allows limited opportunity for segregated off-road cycle routes. Many people lack the confidence to cycle due to real and perceived road dangers; traffic speed and driver behaviour are contributing factors.

**2.25** Earlier childhood transport independence can contribute to reducing peak time congestion, known to reduce during school holidays. Anecdotally, many parents cite taking children to school as the reason they must drive to work. This independence also enables a wider range of social contacts and responsibility among young people. Investing in transport for young people will pay long-term dividends, as they are tomorrow's commuters. Work by the Blackpool Travel Plan Partnership shows that many people are unaware of travel options

available and are reluctant to contemplate using alternative modes to the car. The council is promoting the message that a small change in travel behaviour can make a big difference. The issue of travel behaviour is picked up again in the LTP Implementation Plan that should be read in conjunction with this document.

## Strategic objectives

**2.26** To address the challenges and key issues that have been identified and to inform the framework for implementing the LTP, the following strategic objectives have been devised:

- i Objective 1** – Improve, maintain and make best use of Blackpool's transport network; in particular its roads, footways and bridges.
- i Objective 2** – Improve road safety by interventions that reduce the number of people, particularly children, killed and seriously injured on Blackpool's roads.
- i Objective 3** – Manage congestion levels on Blackpool's roads, especially where it impacts on local economic performance.
- i Objective 4** – Improve transport to and within the resort, particularly by more sustainable modes, to enhance the visitor experience and support the local economy.
- i Objective 5** – Improve the efficiency and management of parking to support the local economy, especially for shoppers and visitors.
- i Objective 6** – Improve access to healthcare, education, employment, shops, social/leisure opportunities and resort attractions, particularly by sustainable modes.

**2.27** Underpinning this strategy will be the need to provide value for money and ensure best use is made of existing assets. Climate Change mitigation and adaption will be important considerations as the strategy is implemented.

**2.28** Table 1 shows how Blackpool's strategic transport objectives help meet the National Transport Goals and Corporate Goals.



Table 1 - How LTP objectives help meet national and corporate goals



		National Transport Goals					Corporate Goals				
		Economic Growth	Carbon Emissions	Equality of Opportunity	Safety, Security and Health	Quality of Life and Healthy Natural Environment	Economic Prosperity	Safe, clean and pleasant place	Skills and education	Health and well-being	Efficient and high performing
LTP Objectives	Highway Maintenance	□□	□	□	□	□	□□	□□	□	□	□□
	Road Safety	□	□	□	□□□	□□	□	□□	□□	□□	□□
	Congestion	□□	□□	□□	□□	□□	□□	□□	□	□	□
	Visitor Economy	□□□	□□	□	□	□□	□□□	□□	□	□□	□□
	Parking	□□	□	□□	□□	□□	□□	□□	□	□	□□
	Accessibility	□□	□□	□□□	□□	□□	□□	□□	□□	□□	□

- Very important contribution
- Significant contribution
- Little or no contribution





## 3. Meeting the Transport Challenges

**3.01** Six key issues have been identified and strategic objectives to address them formulated. There follows a description of how Blackpool Council will meet the transport challenges, which will help shape the LTP Implementation Plan's delivery mechanisms.

### Highway maintenance

**3.02** Blackpool Council, conscious that there have been insufficient funds to maintain the highway network in its current state, is looking for innovative ways of improving the overall condition of its highway asset (roads and footways). It has agreement to prudentially borrow £30m over 25 years to address the maintenance backlog and significantly improve the overall condition of the road network. Notwithstanding, the council wishes to protect and maintain at least current levels of maintenance; to this end the DfT's December 2010 capital block settlement for highways capital maintenance is welcome news.

**3.03** The council will endeavour to maintain Blackpool's highways and transport assets to a good standard which meets the needs and aspirations of users and residents. Much of highway network is comprised of residential streets, some of it forms district and local centres which are focal points for local communities. The condition of Yeadon Way, a main arrival route into the resort, is deteriorating due to settlement near to its key structures (it was originally a railway embankment); better enforcement is needed to reinforce the weight limit for heavy goods vehicles.

**3.04** The council will ensure its footways and cycle routes are kept in as good a condition as possible, facilitating safer and healthier travel. The council will look to integrate other initiatives into its maintenance work programmes, for example measures to improve traffic management, parking areas, road safety, bus stops and facilities for walking and cycling. This will help people access the key facilities they need and reduce pollution, to improve local air quality and help combat Climate Change. Liaison with neighbouring authorities will continue.

**3.05** The council will continue to report progress against the two national indicators (NIs) for highway condition:

- i NI 168 Principal (A) roads where maintenance should be considered.
- i NI 169 Non-principal (B&C) classified roads where maintenance should be considered.

**3.06** The local highway network and other local transport infrastructure together represent by far the largest and most visible community asset for which Blackpool Council is responsible. The authority, through its Highways Asset Management Plan (HAMP) has compiled detailed information on what its infrastructure comprises and how much it is worth. The development of more cost-effective maintenance and replacement programmes is part of this process, supported by effective technical and management systems. The HAMP sets out what Blackpool wants to achieve with its highway network, clearly quantifying the value of the transport asset, identifying investment needs and priorities and establishing co-ordinated programmes of works.



3.07 Blackpool Council's Executive approved its interim HAMP in March 2010, its aims are to:

- i manage and improve the safety of Blackpool's roads;
- i maintain the current condition of the Strategic Road Network;
- i manage the decline of the residential network in a safe state;
- i reduce compensation claims from accidents;
- i promote and enable walking and cycling; and
- i where possible, increase local residents' and visitors' customer satisfaction.

3.08 All the council's bridges and structures have been assessed and are to be integrated into the HAMP process. There is concern about the poor and deteriorating condition of many of these and the lack of funding to repair them.

3.09 The council has commenced work on an innovative project to develop a new asset management system to enable it to manage its highway infrastructure more efficiently. Due to be completed at the end of 2011, the project is focused around the development of the Geographical Resource Platform (GRP). This will

incorporate an innovative method for automatically calculating the exact area of roads and footways that Blackpool Council is responsible for, plus allowing it to monitor their condition and value its many thousands of assets such as carriageways, footways, barriers and road signs.

3.10 The GRP will also provide much wider access to asset information, enabling not only engineers, but a wider audience within the council and the general public to see and understand what highway infrastructure the authority owns and the condition it is in. The council has a clear vision of how this development will use the latest in web-based mapping systems and innovative methods for calculating and modelling the performance of the highway infrastructure whilst at the same time monitoring the delivery of services and changes in highway assets. The GRP will enable the authority to accurately quantify, assess the condition of and hence value its highway assets. This will also enable the council to manage its highway assets based upon a full picture of both its social worth and financial value, thus improving service delivery to its residents and visitors and enhancing the safety of the highway network.



## Road safety

**3.11** Blackpool Council is updating its Road Safety Strategy in 2011 to continue to address the issue of the number of people killed and seriously injured on Blackpool's roads and the severity of the casualties. Road casualties impose a heavy cost in both financial terms and human suffering. Statistics have shown levels of road casualties amongst young people to be relatively high. It should be stressed that all road casualties, particularly killed and seriously injured, are of concern. Other related issues to be addressed are crime and antisocial behaviour, particularly on public transport systems; fear of these happening can deter more sustainable travel.

**3.12** There will be a continued focus on child casualty reduction; pedestrian, cycle and driver training have important roles to play in achieving success. Areas where there have been clusters of collisions will be targeted; safer routes initiatives will be prioritised, linked to the school travel plans. The strategy will address how to better communicate the road safety message to more vulnerable and harder to reach groups, raising awareness in the more deprived areas of Blackpool and targeting car users. It will address personal security issues, enabling people to travel more safely on Blackpool's transport network. There will be an emphasis on education, training and publicity which will complement the remodelled highways and effective law enforcement. The PFI will improve most of the town's street lighting, which will benefit road safety, along with enhancing crossing facilities at the majority of traffic signals.

**3.13** Speeding and rat running will be addressed through traffic management and integrated area initiatives. There will be a focus on speed management and implementing 20mph zones where appropriate. A change in road user behaviour will be sought; more considerate attitudes will contribute to community cohesion as well as reducing the numbers of collisions resulting in people being killed or seriously injured and the severity of the casualties. Travel behaviour change will be sought through education, publicity, through the travel planning process and 'Smarter Choices' initiatives (techniques for influencing people's travel behaviour towards more sustainable options). The Road Safety Strategy will dovetail with the desire for more travel choice and a greater use of walking, cycling and public transport, and will set new targets for casualty reduction.

**3.14** New developments will be more thoroughly assessed for road safety implications and mitigation sought where necessary. Through the PFI, over the lifetime of the plan, the council will ensure that the majority of signal-controlled installations are made safer for all users, including pedestrians and cyclists.

**3.15** Primarily, progress will be monitored annually (calendar year) through two national indicators which are published by the DfT and collected by the police:

- i NI 47 People killed or seriously injured in reported road traffic accidents.
- i NI 48 Children killed or seriously injured in reported road traffic accidents.

**3.16** There is support in principal from Elected Members to continue with the Lancashire Partnership for Road Safety; work is currently being undertaken to identify an operational and funding model.



## Congestion

**3.17** Most congestion occurs during school terms, during the traditional morning and afternoon peaks, and on tourist routes. There is 'endemic' congestion in some areas, for example around the Oxford junction. Blackpool Council's policy on congestion is twofold. Firstly, to effectively manage the highway network where congestion is occurring and, secondly, to reduce the pressure on the network by reducing traffic demand. The council does not want congestion levels to hold back the local economy, it is important that visitors are able to travel comfortably into and out of the resort by their mode of choice. It is also important that congestion does not deter residents from coming into the town to shop. Clearly more congestion and journey time unreliability will occur if traffic levels increase, detracting from the local amenity and the visitor experience. Greenhouse gas emissions need to be reduced and the network should cater for all modes and users in an efficient and equitable manner.



**3.18** Car ownership is likely to rise from a relatively low level and car use is likely to become more attractive as some bus services are cut. The cost of motoring, fuel and insurance is likely to increase but people will still travel if they need to and so congestion levels will need to be kept in check. Blackpool's compact urban form means a lack of space for new road capacity. Large scale schemes are expensive and in the current climate unrealistic and unaffordable. For example a wholesale remodelling of the Oxford junction would cost over £2m, meaning the council would be unable to deliver a balanced, value for money, programme across the borough.

**3.19** The council will make the best use of its existing network to ensure traffic moves as freely as possible, improving journey time reliability. Most of the signal-controlled junctions in the borough are being renewed under a PFI; the latest technology will be incorporated in the modified layouts, affording the council the opportunity to utilise Urban Traffic Management and Control (UTMC) to optimise the operation of the highway network. This could also involve such measures as car park guidance systems and bus priority. In some instances, based on need, the council will continue to add value to the PFI contract by allocating LTP resources to improve pedestrian and cycling facilities, and to improve the efficiency of traffic movements. Congestion will be managed in Blackpool mindful of the wider Fylde Coast network, particularly for north-south movement.

**3.20** To reduce pressure on the network people will need to drive less. Not all trips made by car are essential and some of those that are deemed to be can be made at other times of day. Driving off peak is also cheaper and has less environmental impact. Drivers need to be fully aware of the real costs, as opposed to the perceived costs, of motoring. To help manage congestion, they need to drive more smoothly and be aware that more economical driving is better for the environment and for road safety. Simple things like having tyres inflated correctly can help to reduce carbon emissions. The council will consider marketing campaigns to raise awareness of these issues. At the same time, drivers can be made aware of the benefits of alternative modes of travel to the car. There are tangible health and environmental benefits from these alternatives being adopted.

**3.21** To reduce congestion and benefit the local economy, the council will encourage more walking and cycling and greater use of public transport. Better integration of train, bus and tram services will be sought. For people living and working in Blackpool, a programme of 'Smarter Choices' measures, along with promotion of active travel, will be considered to encourage a shift to alternative modes of transport and reduce the need to travel altogether. PRow networks will be improved to provide effective off-road links for sustainable movement. Travel planning initiatives will continue, which will also target car sharing; most of the benefits of the car can be realised but the cost and impact of motoring is much reduced. The former is pertinent due to the rising cost of motoring; especially fuel, insurance and vehicle depreciation. Reduced delay and fuel consumption due to alleviating congestion problems will assist the local economy and benefit the environment.

**3.22** To monitor congestion levels there will be a new flow-weighted congestion measure which consists entirely of data produced by the DfT; this will be published quarterly. Other relevant indicators are bus punctuality; NI 178 measures bus services running on time, an indication of congestion. NI 198 collected through the school census, monitors children's usual mode of travel to school, which is a good proxy for the changing demands placed on the local highway network. Successful school travel plans will result in less congestion on local roads during the morning peak and after school finishing times.

## *The visitor economy*

**3.23** Blackpool's economy depends on tourism, the visitor experience of the resort's transport network is all important. Most visitors arrive by car and the quality of the access routes to the attractions form part of the visitor experience. Most of Seaside Way has been improved but further enhancements are desirable. Yeadon Way will be prioritised for improvement. Advanced directional signing has been reviewed and a programme of improvements will be implemented. Effective and efficient car park access is at the core of the strategy, the aim is to manage congestion to improve journey quality and reliability. UTMC, linked to Variable Message Signs (VMS), can help achieve this. The regenerating town centre is an important destination.

**3.24** Once in the most convenient car park for their destination, visitors need to be able to complete their journey safely and easily. There is a need to have clear walking, cycling and public transport (including taxi) options available for onward travel but people need to be confident their car is safe and secure. Wayfinding signing forms part of the programme, the cycle hire scheme presents a practical alternative and the local public transport network is a good way to travel the length of the Fylde Coast and out to Blackpool Zoo, which is also on the hire bike network. New developments will need to be accessible by all modes of transport, as appropriate.



3.25 Blackpool has limited capacity to accommodate significant traffic growth; therefore a change is required in the way that visitors travel to and within the town. To help achieve this the quality of rail services to the resort needs to improve, this means better rolling stock, more through trains to other UK destinations, improved interchange facilities at Preston railway station and a better environment outside Blackpool North railway station. Also, in future, potential connection to the proposed high speed rail network. In order to maintain the attractiveness of Blackpool as a destination for coaches, it is desirable to improve provision of coach parking in the resort. Taxis play an important role supporting the visitor economy by providing onward travel to destinations, especially for coach and rail passengers with significant luggage. Once in the resort, visitors need to be able to circulate with ease, without requiring a car. This means the provision of effective information (signing and wayfinding) to encourage the use of sustainable modes and links to public transport.



3.26 The renewal and upgrade of the Blackpool - Fleetwood Tramway will play an important role in catering for Blackpool's future travel needs. The north-south road corridors, including the Promenade, can be congested. The upgraded tram system has the potential to encourage modal shift from the car and play an important role in supporting the development of the visitor economy in the town centre and resort.

3.27 Blackpool International Airport has an important role to play in the future economic development and growth of the sub-region for residents and visitors alike. The council will support the airport as it updates its Master Plan and Surface Access Strategy to improve public transport access by bus, coach and linkage with Blackpool North and nearby Squires Gate station on the South line.

## Parking

3.28 To support the tourist-orientated economy, there is a clear need for a more strategic direction in the provision and management of town centre and resort public car parking, both on- and off-street. To improve efficiency, traffic and parking management must be looked at in totality, especially to support the commercial and the retail sectors in the Town Centre and district centres. Onward pedestrian routes from car parks are considered to be important. Opportunities to encourage and enable people with longer onward journeys to hire bicycles and use public transport will be taken.

3.29 Blackpool Council is developing a Parking Strategy to address how the different and sometimes competing demands of resort day visitors, staying visitors, residents, shoppers and commuters can be met in the best possible way. It will be developed in the context of Talbot Gateway proposals to redevelop the area around Blackpool North and the emerging proposals for a major leisure attraction on Central Car Park. The strategy will help ensure the economy of Blackpool is supported and that regeneration can be sustained. It is likely that shoppers and visitors will be prioritised over commuters.

3.30 Where possible, the council will ensure the quality of Blackpool's main parking provision is improved in relation to its accessibility, ease of use, internal and external appearances, and the personal safety and security of its users. It will make more efficient and effective use of existing parking provision, trying to ensure customers use the most appropriate car parks. To encourage visitors to park their cars and travel around Blackpool by sustainable modes, car parks need to be safe and of high quality so visitors feel confident that their vehicle is secure.



**3.31** To reduce emissions and improve efficiency, the council will aim to reduce the time spent and the distance travelled when searching for a car park space, both on- and off-street. Subject to funding and maintenance budgets, it will consider the provision of a car park guidance system with VMS, linked to UTM. This system would be integrated with proposals for Talbot Gateway and emerging proposals for Central Car Park.

**3.32** Park and Ride is perceived as a solution to congestion in Blackpool but currently it would not be practical or cost effective as the considerable cost of start-up (there is insufficient funding) and operation (a site would be needed) would outweigh any revenue generated. The situation may change if a major development comes forward on Central Car Park. Presently, with Yeadon Way providing good access to well-located car parks that are seldom at capacity, a Park and Ride's purpose is not clear. Thus the council will rely on traffic management and modal shift to manage congestion.

**3.33** Parking pressure occurs during events, near attractions, on business parks and surrounding significant developments. Large developments need careful assessment with regard to access and parking to obviate the need for reactive measures after opening. Effective travel plans have a key role to play in reducing pressures on parking, improving accessibility, lowering levels of congestion and reducing carbon emissions.

**3.34** The council will only instigate work on a residents' parking scheme where there is a clear safety issue or a network management problem that could only be managed by such a scheme. Also, they need to be effective; many existing schemes have just displaced parking to the next available area not covered by a residents' parking scheme.

**3.35** The adopted Blackpool Local Plan contains maximum car parking standards and minimum standards for cycle, disabled and motorcycle parking. The council will ensure that all new developments have an optimal mix of parking provision.

## Accessibility

**3.36** The council will help to improve access to key destinations. This includes the Town Centre, which is perceived by some as being inaccessible. Good access to Blackpool's town and district centres by all modes of transport is vital to support the local economy. Developments at Talbot Gateway and on Central Car Park present opportunities to improve access by car, bus, coach, taxi, foot and bicycle. Severance issues will be addressed. A bid to the Regional Growth Fund is being made to help bridge a funding shortfall in the Talbot Gateway scheme.



**3.37** There are some instances where development has occurred at peripheral locations during past decades that are not or cannot be well served by public transport. Together this new LTP and the emerging LDF afford Blackpool Council the opportunity to better integrate land-use and transport planning in the years ahead. The 2011 census showed over 14,000 people lived in Fylde and Wyre districts and worked in Blackpool and over 12,000 people resided in Blackpool and worked elsewhere on the Fylde Coast. Joint working with neighbouring local authorities and partner organisations will be important to address accessibility issues. The council will work with developers to influence locations for new development, aiming to reduce the need to travel and also to ensure adequate accessibility through improvements to the transport network to serve and promote new developments. There is recognition that the longer term viability needs to be considered when providing new or extending existing bus services.

**3.38** Effective spatial planning will be crucial in siting development in locations that are easily accessible by sustainable modes, managing congestion and minimising future carbon emissions. Through the planning process, the council will ensure all new developments are as accessible as possible by all main modes of transport, but particularly by public transport. Facilities to encourage cycling should be provided in all new developments. Travel plans should be implemented to improve and encourage more sustainable access (walking, cycling, public transport and car sharing) to workplaces and educational establishments. All travel plans should be reviewed at least annually.

**3.39** Partners in the transport, education, skills and employment support fields will need to continue to work together to ensure that travel horizons are pushed outwards. By encouraging residents to take full advantage of the transport network, partners can increase the pool of opportunities within reach of residents. Personal travel plans could play a more important role.

**3.40** Good public transport is important to enable local people and visitors, especially those from disadvantaged groups, to access employment opportunities, sports and leisure facilities, education and training. Due to Blackpool's geographical location, there is relatively little scope to combat worklessness by establishing stronger transport connections with areas beyond the Fylde Coast. As labour market linkages to major employment hotspots are limited, the focus must continue to be promoting local economic development and growth. In this regard, potential growth of employment and residential development close to M55 junction 4 presents an opportunity for a co-ordinated and structured approach. Development at this location must be as sustainable as possible.



**3.41** The reduction in bus service provision is a concern. The council will continue to liaise closely with operators to reduce the impact of service cuts, particularly those that affect evening and weekend services. Further quality bus initiatives will be taken forward, including stop and shelter upgrades, and the introduction of active bus priority. Rail will play a more important role; studies have shown the potential for service enhancements and the DfT is committed to electrify the line between Blackpool North and Preston, enabling electrified services to Manchester, Liverpool and other major towns and cities. Public transport should be better integrated, to make it a more viable alternative to the car. Timetables and ticketing are two areas where there is much scope to improve the situation that exists presently. Cycle parking should be provided at public transport hubs, such as railway stations and tram stops.

**3.42** The promotion of cycling, through marketing and improved cycling infrastructure, will play an important role in increasing local accessibility within Blackpool and on the Fylde Coast. The Cycling Towns legacy will ensure large swaths of the town are more accessible by bike. The 'explorer' and promenade routes will be integrated into the Strategic Cycling Network. The Hire-a-Bike cycle rental scheme presents a real opportunity to improve access to resort attractions, supporting the visitor economy and improving the local environment.

**3.43** School transport will be provided for those of whom there is a strict statutory duty to do so. Dial-a-Ride Community transport will continue to be available for those unable to use conventional public transport.

## *Greenhouse gas emissions and air quality*

**3.44** The Climate Change agenda and the environmental implications arising from increased carbon emissions have gained significance since the second LTP and should be important considerations in shaping transport policies and proposals. Central Government have committed to reduce greenhouse gas emissions; the target, set by statute, is a 14% reduction by 2020 against 2008 levels. In Blackpool there is a need for transport to aid economic regeneration but this should be carried out with as little impact on the environment as possible.

**3.45** The need to reduce carbon emissions overarches at least three LTP strategic objectives. Viable sustainable travel options need to be available for congestion levels to be managed effectively; greener travel plays an important role in supporting the visitor economy; and more environmentally-friendly travel options are key to achieving good accessibility.

**3.46** In 2008 Blackpool Council produced an Air Quality Action Plan to address air quality issues in its only AQMA, centred on Talbot Road (see Figure 2). The council continues to monitor the situation; modelling has showed the situation has improved since the AQMA was declared in 2005. Improved air quality will benefit human health and encourage more active travel, which in turn will benefit local air quality and help combat Climate Change.



**3.47** A 45% reduction in transport emissions can be achieved through a widespread adoption of electric cars, and the use of hydrogen to power heavy goods vehicles and buses. The council hopes further incentives to introduce charging points and new technology will be brought forward by Central Government. Bus and coach operators have been playing their part by progressively reequipping their fleets with modern low emission vehicles.

**3.48** The council is overseeing the widespread introduction of more efficient street lighting, renewed through the PFI, which will reduce energy consumption markedly. Junctions modified as part of the same initiative will operate more efficiently, reducing harmful emissions. Modified layouts will help create conditions that are more conducive to walking and cycling. Climate Change adaption, in general, will be addressed through the HAMP process.

**3.49** The implementation of 'Smarter Choices' initiatives can help reduce emissions; innovative marketing and promotion will be used to persuade people to change their travel behaviour. Blackpool has an effective Travel Plan Partnership and has a good track record of supporting the development of effective workplace, school and personal travel plans. These focus on initiatives to reduce the need to travel and encourage more car sharing, walking, cycling and use of public transport.

**3.50** The Cycling Towns programme is encouraging more people in Blackpool to cycle more often. Recently the Town Centre has been transformed, with new public realm that gives priority to pedestrians. There will be economic and social benefits from more active travel, reducing the cost to society and on the NHS. The completely revamped Tramway presents opportunities for significant modal shift to a lower-carbon transport system. Blackpool's bus network is comprehensive and has seen growth in ridership during the second LTP period, helping to combat Climate Change. The rail network has also seen passenger growth; electrification of the line to North Station later in the plan period will reduce greenhouse gas emissions significantly. Ticketing arrangements need to improve to make public transport quicker and a more viable alternative to the car. 'Shared space' design reduces stop-start motoring and provides an environment more conducive to walking and cycling.

**3.51** The council will manage the network more efficiently for journeys that can only be made by car and for freight deliveries necessary by road; more efficient vehicles and vehicle operation will be promoted. Lower speeds, coupled with smoother driving, are necessary in order to achieve the strategic objectives of managing congestion and improving road safety. This will also reduce emissions of harmful gases and particulates, which will also be achieved by promoting alternatives to the car for personal trips.



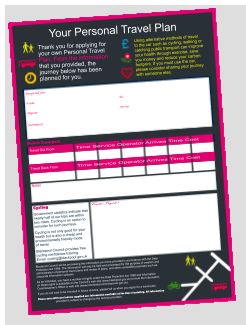
Figure 2 - Air Quality Management Area



## Health and well-being

3.52 LTP programmes will contain measures that encourage more active travel, mainly walking and cycling. Issues will be addressed by community route-based schemes focused on district centres, public transport hubs and educational facilities. Schemes will seek to reduce the negative impacts of traffic; its speed and dominance in particular. ‘Smarter Choices’ initiatives will include personal travel plans, promoting active travel in pursuit of LTP objectives. Partnership working with health providers will maximise opportunities and benefits.

3.53 The PFI contract will upgrade street lights and provide the opportunity to economically upgrade existing traffic signals and pedestrian crossing sites to provide better pedestrian and cycling facilities. ‘Bikeability’ cycle training, Bike-it and Bike Club initiatives will continue to increase levels of cycling in the local population. Cycling Towns routes and the rejuvenated Promenade will provide an environment conducive to leisure and exercise. ‘Explorer’ cycle routes link the Promenade to inland parks, Blackpool Sports Centre and open space, improving access to leisure opportunities that will bring health benefits. Access to social opportunities and fresh food are also considered important to help improve the population’s physical and mental health. Fundamentally, the council would like people to build exercise into their daily travel routines by walking and cycling more. Travel plans will play an important supporting role.



## Travel behaviour

3.54 Blackpool residents and visitors have travel choice and discretion in the trips that they take. The council intends to influence residents and visitors to alter their travel behaviour to select more sustainable modes. Congestion can be reduced and road safety, air quality and personal fitness improved, if people travel more using public transport, cycling and walking. The more people walk, the more potential for spend in local businesses. The council will seek to improve resort access for residents and visitors using the travel mode that is most convenient for them, while encouraging modal shift to sustainable modes at the journey end, if not for the journey itself.

3.55 The council will provide for sustainable transport modes in all transport scheme designs and initiatives. Modal shift to existing sustainable transport alternatives can reduce the need for infrastructure investment and the land take that this may involve. Sustainable modes must be convenient, reliable, affordable and safe in order for their usage to grow. The council will not discriminate against car drivers, particularly visitors whose car-borne access to the resort’s attractions will be made as convenient as possible. However, increasing car-travel within the resort cannot be accommodated indefinitely without affecting the local environment, economy and parking provision.

3.56 This LTP will continue to deliver quality bus improvements and bus priority to encourage bus use. Train and express coach services are available to visitors, ensuring more sustainable access to the resort. The council will encourage modal shift to sustainable transport, offering alternatives to those affected by the rising cost of car travel. 'Smarter Choices' based marketing to increase patronage will make marginal bus routes more sustainable in the longer-term. Marketing will focus on local home-to-work and home-to-school trips, where there is greatest potential for modal shift.

3.57 Travel planning work has demonstrated that people are often unaware of travel options and can be put off by poor public transport payment systems and poor information about services. The council is proposing a sustainable transport promotion programme using its 'Small Steps' brand, supported by a small works budget, which will help people switch modes if they wish to.

At the time of writing, further Local Sustainable Transport Fund resources to support these programmes are being sought. It is intended that the NoWcard be developed into a cash-carrying smartcard over the plan period, reducing the need for cash payments on public transport.

3.58 The 'Small Steps to Active Travel' campaign will adopt 'nudge' marketing principles currently influencing government social policy thinking. Several local businesses and organisations are already involved in the Blackpool Travel Plan Partnership, identifying measures to remove barriers to sustainable travel, which may be as simple as cycle parking, drying rooms or lockers for outdoor clothing.

3.59 Developers are encouraged to consider transport sustainability and required, when necessary and relevant, to contribute to transport infrastructure and to support bus services.



## Main modes of transport

3.60 Table 2 shows how different modes of transport will contribute to meeting the strategic objectives and help combat Climate Change. Policies for each main mode of transport are stated below.



*Table 2 - Transport modes' contribution to meeting Strategic Objectives and combating Climate Change*

	Strategic Objectives						Climate Change
	Highway Maintenance	Road Safety	Congestion	Visitor Economy	Parking	Accessibility	
<b>Walking</b>	☐☐☐	☐☐	☐☐☐	☐☐	☐☐	☐☐	☐☐☐
<b>Private transport</b>	☐	☐☐	☐	☐	☐	☐☐☐	☐
<b>Bus</b>	☐	☐☐	☐☐☐	☐☐	☐☐	☐☐	☐☐
<b>Taxi</b>	☐	☐	☐	☐☐	☐☐	☐☐	☐
<b>Coach</b>	☐	☐	☐☐☐	☐☐	☐☐	☐	☐☐
<b>Rail</b>	☐	☐☐	☐☐☐	☐☐	☐☐	☐☐	☐☐
<b>Tram</b>	☐☐	☐☐	☐☐☐	☐☐	☐☐	☐☐☐	☐☐
<b>Cycling</b>	☐☐☐	☐☐	☐☐	☐☐	☐☐	☐☐☐	☐☐

- ☐☐☐ Very important contribution
- ☐☐ Significant contribution
- ☐ Little or no contribution



## Walking

**3.61** The council sees walking as the primary mode of transport for journeys under one mile. The second LTP saw regeneration schemes in Layton and Waterloo Road district centres that transformed the local environment and gave more freedom to the pedestrian. A strategic objective of the LTP is to manage congestion. It could be reduced in some areas if short car journeys were made by foot instead. Walking, as a mode of transport, has been neglected. This LTP aims to better realise the contribution it can make to achieve all relevant strategic objectives. Clearly there are benefits of a mode of transport that inflicts little wear or tear on the highway asset. In addressing road safety concerns regarding the numbers killed and seriously injured on Blackpool's roads, programmes need to consider pedestrians as vulnerable roadusers.

**3.62** Walking will be promoted through 'Smarter Choices' programmes, including travel plans. These ongoing initiatives are vital to change travel behaviour in order to address rising congestion levels which hold back the local economy. The focus on schools will continue, encouraging habitual walking, in safety, from an early age. School travel plans, if successfully implemented can encourage safer active travel, with benefits for health and Climate Change mitigation.

**3.63** The PFI contract will continue to upgrade pedestrian crossing facilities at the majority of signal-controlled junctions. Area-based sustainable transport schemes will address walking issues. In priority locations flag-to-flex schemes will continue to reduce tripping claims. Severance issues due to traffic will be considered for remedial action. More seating should be provided in pedestrianised areas of the Town Centre to help people who find walking difficult and need to take a break on their journey. Overall, more walking is good news for the local economy as pedestrian footfall in town and district centres benefits local businesses.

**3.64** The council will continue to run the Steps to Health Scheme to assist with the challenge of meeting the Government's recommended 30 minutes moderate activity per day on at least five days per week. Targeted at all age groups the walks are mainly for those who lead a sedentary lifestyle who want to partake in physical activity in a safe and enjoyable environment.

**3.65** Blackpool's PRow network penetrates into rural and semi-rural areas, connecting into Fylde and Wyre boroughs, facilitating countryside access and linking communities to leisure opportunities. PRow's will be maintained to a high standard and where opportunities arise enhancements will be sought.



### Private transport



**3.66** This LTP recognises the importance of private motorised transport to Blackpool residents, for them to access the opportunities they need and to improve their quality of life. The car is the primary mode of transport and the numbers are likely to increase putting added pressure on the highway network and on-street parking. Due to the increasing cost of motoring, including car parking, power-two-wheelers (PTWs) have become more popular in recent years. The high and rising cost of insurance is an issue for young drivers and riders, particularly males. The rising cost of fuel is making car and bus travel more expensive; congestion exacerbates the situation as engines work far less efficiently and burn a lot more fuel with consequences for emission levels and air quality. The road safety message will continue to be emphasised, to reduce speeds and the numbers and severity of casualties.

**3.67** The council will prioritise trips that benefit the local economy, including by goods vehicles. Town Centre shopper parking will be given priority in the emerging Parking Strategy, considered vital to support the local retail sector. Traffic management will be improved to efficiently guide visitors to the most appropriate car park, making resort attractions more accessible and reducing unnecessary mileage Resort-wide, sufficient parking to support a regenerating and diversifying tourism economy will be provided but the use of cars whilst in the resort will be discouraged. The council will support the safe use of PTWs by providing free parking areas in municipal car parks and by encouraging developers to do likewise through the planning process.

### Public bus

**3.68** Buses are a key element within Blackpool's transport system, reducing congestion, providing more sustainable personal mobility and making an essential contribution to Blackpool's economy. Buses carry over 16 million passengers annually on the Fylde Coast. Services afford people a viable alternative to the car for important journeys to work, education and healthcare. The Council will continue to support socially-necessary services, if resources are available.

**3.69** During the second LTP period, the council published its Bus Strategy which contains the following headline objectives:

- i To enable more reliable bus services to be provided by improving punctuality.
- i To make services more accessible by improving bus stops.
- i To provide clear information, that includes onward interchange to other public transport modes, including possible Real Time Information.
- i To encourage operators to provide a more modern bus fleet that is more comfortable to use.
- i To encourage easy-to-use ticketing systems with increased off-bus ticketing to speed up boarding and alighting.

**3.70** The public bus service in Blackpool is good, but the principal operator, Blackpool Transport, has felt compelled to make significant service alterations in mid 2010 mainly due to circumstances beyond its control, including the current economic climate and national concessionary fares scheme issues. Bus services have been rationalised: there are less early morning and evening services, and more routes now terminate in the town centre. At roughly the same time the council made alterations to the traffic circulation in the Town Centre, which altered the routings of well established bus routes, including those of the operator Stagecoach. More cuts cannot be ruled out.



**3.71** The council will maintain a Bus Operators' Forum and liaise with individual operators as appropriate. The inter-urban services that Stagecoach, Coastal Coaches and Cumfybus provide are considered vital, as is the support provided by LCC. Quality bus measures implemented on Blackpool Transport's lines 5, 7, 11 and 14 during the second LTP period will be extended to other corridors during the implementation plan period. These upgrades benefit other operators too. Where direct routes are available, bus services will be heavily promoted for Fylde Coast travel.

**3.72** Despite recent network changes and forthcoming challenges from support for concessionary fares and the forthcoming 20% Bus Service Operators' Grant cut, buses have the potential to grow ridership as the resort regenerates. A bus priority system will increase service reliability, which is the prime concern for many bus users, as highlighted by local bus user satisfaction surveys. There are proposals to install traffic signal bus priority measures along Lytham Road to aid the movement of buses through junctions. Dependent on the success of the pilot, a bus priority programme will be implemented over the plan period. Through this, bus travel will become faster and more reliable and as such will increase the likelihood of attracting and maintaining patronage. It will also ease congestion, which holds back economic growth.

**3.73** Passengers have a legitimate expectation of a safe, comfortable and clean passenger waiting environment so the council will address the issue of bus stop provision over the plan period. Where appropriate, developer contributions will continue to be sought to enhance bus stops. More rigorous enforcement of parking regulations at bus stops will be encouraged.

## Taxi

**3.74** The council recognises the important role taxis and private hire vehicles play in supporting the visitor and night-time economies. The role landaus play in providing pleasure trips is also acknowledged. Regular dialogue occurs between representatives of the trade and council officers concerning network and ranking issues. Appropriate ranks will be maintained for both day- and night-time economies. New development and regeneration projects will be required to provide sufficient taxi ranks in favourable locations.

**3.75** For the taxi trade to fulfil its contribution to reducing congestion and achieving travel behaviour change, it needs to be available for the trips that people would otherwise require a car for when other non-car alternatives fail. In this way, taxis can help to support lower car ownership and use. In addition, taxis can play a useful role in carrying groups of visitors unfamiliar with the town and create a crucial link between transport hubs, hotels and attractions.



## Coach

**3.76** The council recognises coach's potential for sustainable tourism access as complementary to rail travel, but is hard-pressed to provide the quality infrastructure needed to help the industry. Nonetheless, the excellent VisitBlackpool website promotes coach travel and provides information to coach operators and group travel organisers. The industry will receive the council's support where possible.

**3.77** Coaches are far more efficient movers of visitors to Blackpool than cars but the facilities for them are rudimentary; integration with the wider regeneration process is the only hope of replacing them. Basic coach parking is provided on Central Coach, Sands Way and Gynn car parks. Regeneration proposals, especially the potential redevelopment of Central Car Park, would significantly increase the demand for coach drop-off, pick-up and layover. The Central Corridor is strategically important as most facilities are located here.

3.78 Many scheduled coach services have recently been transferred from the Talbot Road Coach Station to a new coach facility, sited adjacent to Central Car Park. Although this has improved the offer to coach operators, it is a basic facility as the site is earmarked for development. Major developments will be required to provide appropriate facilities for coaches, their passengers and drivers. The facilities at Lonsdale Road Coach station will have to be re-provided if development occurs on the site.

### Rail

3.79 In 2010 it was announced that the railway line between Blackpool North, Preston and Manchester is going to be electrified towards the end of the plan period. The council aspires to new direct services to major UK towns and cities. The rail link to Preston would benefit from track and signal upgrades to improve line speeds. The council will support any potential future connections to the high speed rail network.

3.80 Electrification will have considerable environmental advantages over the current diesel-based system and will significantly benefit the Blackpool and Fylde Coast economy due to faster journey times and enhanced services with more direct trains to major cities and conurbations. Connectivity with the national rail network will be much enhanced, substantially improving Blackpool's accessibility and increasing rail's modal share. This will help network management on the main access roads to the resort, improving environmental quality and encouraging repeat visits.

3.81 The South Fylde Line Community Rail Partnership will continue to be supported, as will SINTROPHER proposals to transfer the South Fylde Line to tram-train operation. The line would benefit from the provision of passing loops if the business case can be made, as service frequencies could be substantially improved. The line has great potential, with links to urban centres and employment sites en route to Colne in east Lancashire.

3.82 Research commissioned by the council demonstrated growth potential from a wide range of investments, mainly better services coupled with electrification. To improve interchange there is certainly a need for the railway companies to provide covered public cycle parking at Blackpool North and other Fylde Coast stations. Also, to work in partnership with the bus companies to try and ensure their respective services integrate.

3.83 Rail travel will be promoted through workplace travel plans and VisitBlackpool will continue to work with train operating companies to promote rail services as a sustainable alternative to car-borne tourism.

### Tram

3.84 The upgrade of the Blackpool- Fleetwood Tramway will be complete by Easter 2012. This will give Blackpool a modern and accessible transport system, providing good connectivity to Cleveleys and Fleetwood in Wyre borough. The new system will help Blackpool manage its congestion and will add a new dimension to the visitor experience.

3.85 Blackpool is Bombardier's first customer for the new Flexity2 tram; the latest design incorporates low floor design for easy access and state-of-the-art video surveillance equipment to improve passenger safety. The new trams use less energy than the older vehicles, which means reduced carbon emissions. They will run alongside a reduced fleet of heritage trams, which will be modified to comply with equality legislation.

3.86 The new system will provide a viable alternative for car use, especially for commuting. For the scheme to realise its full potential there needs to be better integration with other modes, for example with bus at Starr Gate and cycling at stops along the system's length. Through- and joint-ticketing, with the bus and rail networks, has the potential to increase ridership. The council would like to construct a link to North Station (estimated to cost in the region of £15m) but there is no funding for this at present.



3.87 The council will support any development phase of the SINTROPER project using tram-train technology to improve Fylde Coast connectivity, including to Blackpool International Airport, although financial resources will not be immediately available.

### *cycling*

3.88 Blackpool Council will continue to promote cycling, especially for journeys between one and five miles. More cycling is seen as important to help reduce congestion, improve accessibility and health, and combat Climate Change. Cycling will be promoted for school travel, linked to school travel plans. Cycle promotion and training will be incorporated within 'Smarter Choices' programmes. Blackpool was delighted to be awarded Cycling Towns status in late June 2008.

3.89 As a consequence of the programme, cycling levels are expected to rise. The four 'explorer' routes that have been constructed will be incorporated into a revised Strategic Cycling Network. It is hoped that the Hire-a-Bike cycle rental scheme will become viable and self-sustaining. It would be boosted if employers were able to offer their employees scheme membership, which could be promoted through workplace travel plans.

3.90 All new developments will be required to provide cycle parking/storage for residents, workers and visitors; workplaces should provide secure clothing storage, changing/washing facilities and a drying room. In flats and apartments secure cycle parking should be provided within the development for bicycles (and mobility buggies as appropriate) at the ratio of one per dwelling. Emphasis will be placed on workplace and residential travel plans to ensure the facilities are well used. Public cycle parking will be expanded, to be provided at Blackpool North railway station and all new developments that serve the public.

3.91 The council will ensure provision of Advanced Stop Lines (ASLs) and other cycle-friendly infrastructure, where appropriate, through the PFI programme. Specific cycling measures will be incorporated in area-based sustainable transport schemes. On the Strategic Cycling Network, and elsewhere as practicable, challenging 'pinch points' for cyclists will be identified and remedied.

3.92 'Bikeability' on-road cycle training will continue, free for children only, with funding being provided directly from the DfT. This will be complemented by a variable package of measures focused on schools and workplaces. Bike-It, Bike Club, Go Ride and town-specific measures will aim to increase cycling's modal share. Alternative travel opportunities will be promoted using radio, web, newspaper and billboards, with an aim to change travel behaviour.



## 4. Resources and Delivery

**4.01** An objective-led approach will be central to the delivery of Blackpool's third LTP; the objectives are stated at the end of Chapter 2. In a period of relative austerity the level of funding to deliver the third LTP has been reduced significantly.

### Capital

**4.02** On 13th December 2010 Blackpool Council was informed of its local transport capital block settlement for 2011/12 and 2012/13, and indicative allocations for 2013/14 and 2014/15. The 2011/12 allocation from the DfT is a 23% reduction from 2010/11, the last year of the second LTP. The Integrated Transport Block (ITB), for smaller transport improvement schemes, has fallen from £2,764m in 2010/11 to £1,285m in 2011/12, a 54% reduction and a significant loss of transport investment potential. The allocation for highways maintenance has increased 56%, from £1,087m in 2010/11 to £1,694m in 2011/12. ITB and capital maintenance allocations for 2012/13 are £1,371m and £1,524m respectively.



### Major schemes

**4.03** Blackpool Council and LCC were both delighted to be awarded DfT funding in early 2008 to upgrade the Blackpool and Fleetwood Tramway, a Major Scheme. The upgrade will dramatically improve public transport along the Fylde Coast, boosting the regeneration of both Blackpool and Fleetwood. The council's top priority, for which there is currently no funding, is an extension from Talbot Square to Blackpool North railway station. Regardless, outline proposals will be developed in the hope that additional major scheme funding becomes available in the latter years of this LTP.



### Revenue

**4.04** Revenue budgets have been reduced substantially as part of the council's response to Central Government's Comprehensive Spending Review (October 2010). Staff numbers are being cut and the council's contribution to the Lancashire Partnership for Road Safety is being reduced following the abolition of the road safety grant.

### Local Sustainable Transport Fund

**4.05** Central Government are inviting local transport authorities to develop bids for the Local Sustainable Transport Fund in partnership with local communities. This new fund is designed to challenge local transport authorities to deliver packages of measures that support economic growth, reduce carbon emissions improve safety and increase levels of physical activity in their area; solutions need to be financially robust and sustainable in the long term. The council will bid for the first tranche of funding by the deadline in mid April 2011. The DfT have announced that there will be a 60/40 split, capital to revenue.

## Project 30

4.06 A plan has been drawn up to repair or renew around 40 miles of carriageway and more than 80 miles of footway across Blackpool over the next four years. The refurbishment of the highway network will be funded by borrowing £30m over 25 years, with the repayment costs met from the annual highway budgets, as well as cutting back on the money paid out each year in compensation claims for 'trips and slips' on damaged footways. Work will begin in the central areas of Blackpool, where most life expired roads are located. The council will look at the potential for gaining added value from the project by aligning the works to renew the footways with that to replace street lighting under the PFI.

## Street lighting and traffic signals PFI

4.07 A four-year programme is underway to replace most of the street lighting columns and most of the signal-controlled installations in the borough. The new street lights emit white light which is better for safety and security, and uses less energy, which is better for the environment. The renewal of the signal-controlled junctions presents the council with opportunities to make them safer and more user friendly for all road users. The council will continue to add value to the project by funding enhancements that benefit more sustainable modes of transport and improve congestion management.

## Developer contributions

4.08 Contributions will be sought when necessary and relevant, presently through Section 106 and Section 278 agreements. By 2014 the council will need to have a Community Infrastructure Levy framework in place for standardised tariff-style contributions. This will be taken forward through the LDF.

## Partnership working

4.09 The council recognises that effective partnership working is key to delivery, with:

- i LCC, Fylde Borough Council and Wyre Borough Council (on cross boundary issues)
- i Blackpool Transport and Stagecoach (Bus Operators' Forum and Bus Strategy implementation)
- i Blackpool Travel Plan Partnership
- i Blackpool Cycling Forum
- i BwDBC (benchmarking and best practice)
- i Highways Agency (M55 motorway)
- i Strategic rail and coach (liaison)
- i Blackpool International Airport (liaison)



## Monitoring

4.10 As of late 2010, the requirement to report on National Indicators (NIs) is much diminished. The only transport-related NIs that remain and will be reported are:

- i NI 47 People killed or seriously injured in reported road traffic accidents.
- i NI 48 Children killed or seriously injured in reported road traffic accidents.
- i NI 168 Principal (A) roads where maintenance should be considered.
- i NI 169 Non-principal (B&C) classified roads where maintenance should be considered.
- i NI 178 Bus services running on time.
- i NI 198 Children's' usual mode of travel to school.



4.11 The council will also monitor:

- i Bus and tram patronage
- i Cycling
- i Congestion (reported by DfT using their own data)
- i Traffic composition (modal split)
- i Parking (through the Parking Strategy)
- i Whole of Government Accounts (for the HAMP) – highways infrastructure assets gross replacement cost and depreciated replacement cost

4.12 All local highway authorities have to comply with the Whole of Government Accounts programme by 2012, which obliges councils to report the true monetary value of their highway network each year, in the same way as a private company values its assets for accountancy purposes.

## Implementation Plan

4.13 A concerted programme of interventions is required to address the issues that have been identified. A complementary document has been produced that describes the measures that will be prioritised under each objective. Several interventions meet multiple objectives; the document shows these linkages. The culmination of the report is a programme for the next four years, 2011/12 to 2014/15, although the allocations for the latter two years are only indicative at present. Resource allocations under the ITB are scarce, as is its own revenue, so the council hopes to secure additional funding through the Local Sustainable Transport Fund.

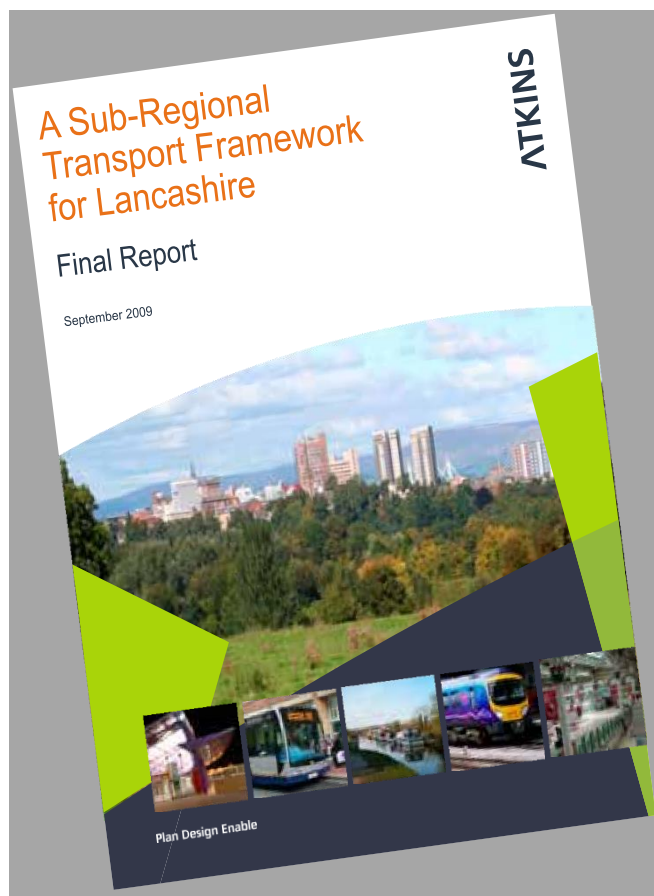
## Appendix A Consultation

### Stakeholder and public engagement

**A.1** The three local transport authorities in Lancashire (Lancashire County Council, Blackburn with Darwen Borough Council and Blackpool Council) launched their joint working on their third LTPs at an all-day event held at the Gujarat Centre in Preston on 9th November 2009. 'A Sub-Regional Transport Framework for Lancashire' (commissioned by the Lancashire Economic Partnership and the three transport authorities) was also present. Presentations were given in the morning to invited stakeholders, the afternoon being us for workshops.

**A.2** The LTP development process was presented to the Blackpool Strategic Partnership's Board on 15th April 2010. Following the board meeting, each sub-group was consulted using the 'goal champion' arrangements. All five corporate goals are relevant and integrate well with the LTP process, but in particular the goal of improving Blackpool's economic prosperity to create jobs and opportunities for local people.

**A.3** Stakeholders were given information on the plan during an initial consultation process, with a closing date of 10th September 2010. They had the opportunity to comment on draft policy background documents and prioritise the challenges (grouped under each of the five National Transport Goals). In a centrespread in the June 2010 edition of 'Your Blackpool' (Blackpool Council newspaper delivered to every address in the borough), the general public had the opportunity to prioritise the challenges and provide additional comments.



**A.4** The key challenges identified were as follows:

Support Economic Growth, challenges:

- ❑ Poor highway network makes travel and transport difficult
- ❑ Cost of delay from congestion to local business
- ❑ Slow delivery and occupation of employment sites
- ❑ Slow delivery of new housing
- ❑ Difficult access between residential areas and employment opportunities
- ❑ Quality of travel and ease of accessibility for visitors



Reduce Carbon Emissions, challenges:

- i High level of carbon emissions
- i High dependency on cars for personal travel
- i Movement of goods required to meet the population's preferred lifestyles
- i The distance travelled to access or deliver goods and services
- i Effect of extreme weather on the transport system

Promote Equality of Opportunity, challenges:

- i People need the skills to support the future economy
- i Travel and accessibility difficulties contribute to inequalities, particularly in health
- i The needs of different social groups may mean that they do not have equitable access to key services
- i There is a growing ageing population with specific transport needs
- i People in isolated communities suffer poor access to services and social networks
- i Limited awareness of travel opportunities is restricting people's life chances

Contribute to better Safety, Security and Health, challenges:

- i Road casualties
- i Road casualties amongst children
- i Road casualties in areas of disadvantage
- i Passengers using public transport may encounter vandalism and antisocial behaviour
- i People feel at risk of crime in some public space, particularly at night

Improve Quality of Life and a Healthy Natural Environment, challenges:

- i The gap between the most and the least disadvantaged people and communities
- i Low quality streets and footways reduce quality of life and make journeys difficult
- i Fear of traffic deters shift to walking and cycling
- i Impact of traffic, including noise and air pollution, can reduce people's well-being
- i Impact of traffic can reduce community cohesion and social inclusion

A.5 Stakeholders were asked:

- i if they supported draft goals (below) and which they saw as the most important;
- i if the right challenges and draft strategic objectives had been identified;
- i what transport measures they saw as being most effective in delivering the proposed goals; and
- i if they had any other comments.



A.6 The following goals were devised:

Draft goal for Supporting Economic Growth:

- i We will secure a strong economic future by making transport and travel more effective and efficient.

Draft goal for Reducing Carbon Emissions:

- i We will reduce carbon emissions to help achieve a low-carbon and resilient transport system.

Draft goal for Promoting Equality of Opportunity:

- i We will improve life chances and achieve a fairer society by improving access to key services and opportunities.

Draft goal for Contributing to Better Safety, Security and Health:

- i We will enable people to travel safely and reach the services they need and the opportunities that help them succeed.

Draft goal for Improving Quality of Life and a Healthy Natural Environment:

- i We will create more liveable communities by making transport less intrusive and more sustainable.

A.7 A further round of consultation was undertaken on drafts of this Strategy and the Implementation Plan. The responses received from stakeholders and the public to both consultations have been thoroughly analysed, the comments collated and fed into the LTP development process.

### *Local Sustainable Transport Fund*

A.8 Information on this new initiative was presented at the community-orientated area forums in January and February 2011. Officers were present to provide information and gather views. Questionnaires completed at the events have been analysed to help indicate priority issues. Additional consultation has been undertaken in a main council office, a library and with members of Blackpool's Travel Plan Partnership.



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<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Alan Cavill, Director of Place
<b>Relevant Cabinet Member:</b>	Councillor Gillian Campbell, Deputy Leader of the Council (Tourism, Economic Growth and Jobs)
<b>Date of Meeting:</b>	6 November 2017

## **ADOPTION OF HOLIDAY ACCOMMODATION SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

### **1.0 Purpose of the report:**

1.1 This report presents to members the Holiday Accommodation Supplementary Planning Document for adoption and the Revised Holiday Accommodation Supplementary Planning Document – Consultation Draft which identifies all representations and the Council’s response. Members will recall approving the Draft Supplementary Planning Document for Consultation at the 24 April 2017 Executive Meeting. Public consultation on the Draft Revised Holiday Accommodation Supplementary Planning Document took place between Monday the 12 June and Monday the 24 July 2017 with a total of 26 responses received.

### **2.0 Recommendation(s):**

2.1 To approve and formally adopt the Holiday Accommodation Supplementary Planning Document (refer Appendix 4a)

2.2 To approve for publication the supporting Holiday Accommodation Consultation Statement (refer Appendix 4b).

2.3 To authorise the Head of Planning Strategy to make any appropriate minor amendments to improve the presentation and finalise a published version of the Holiday Accommodation Supplementary Planning Document (at Appendix 4a).

### **3.0 Reasons for recommendation(s):**

3.1 To provide further detailed guidance to policy in the Blackpool Local Plan Part 1: Core Strategy to support Blackpool’s future regeneration and growth.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

As part of the review of the Holiday Accommodation Supplementary Planning Document alternative options have been considered as set out in the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report (see [www.blackpool.gov.uk/holidayaccommodation](http://www.blackpool.gov.uk/holidayaccommodation))

#### **4.0 Council Priority:**

4.1 The relevant Council Priority is

“ The economy: Maximising growth and opportunity across Blackpool”

#### **5.0 Background**

5.1 Holiday accommodation continues to be an important part of Blackpool's tourism offer and is vital to the resort's visitor economy.

5.2 The Holiday Accommodation Supplementary Planning Document was originally adopted in March 2011 and provides further detailed guidance on the Council's Core Strategy policy CS23 'Managing Holiday Bedspaces'. This policy allows more hotels and guest houses to change to residential use than before, encouraging a better balance of quality homes and guest houses.

5.3 In order to successfully manage this reduction, and retain a suitable level of holiday accommodation in sustainable locations with easy access to the resort facilities and key transport routes, restrictions on change of use apply to properties located within the main holiday accommodation areas.

#### **5.4 Supplementary Planning Document Review 2016/2017**

During 2016/17 a review was undertaken to assess the effectiveness of the Supplementary Planning Document after five years of operation and the continued appropriateness of the boundaries having regard to changes which have occurred within the HAAs since 2011.

The Planning Strategy Team, supported by Envision consultants, has conducted the

review. Full details of the review are set out in the Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Stage 1 Report.

The outcomes of the review led to the production of the Draft Revised Holiday Accommodation Supplementary Planning Document which Members will recall approving for public consultation at the 24 April 2017 Executive.

#### 5.5 Draft Supplementary Planning Document consultation

The Council carried out a six-week comprehensive consultation on the Draft Revised Holiday Accommodation SPD between 12 June and 24 July 2017 in accordance with Regulation 13 of the Town and Country Planning (Local Development) (England) Regulations 2012 and the adopted Statement of Community Involvement. This is detailed in the Consultation Statement (refer Appendix 4b).

Twenty-six representations were received during the consultation. The full comments and the Council's responses are set out in the Consultation Statement (refer Appendix 4b).

The main issues raised directly related to the Supplementary Planning Document were:

- The proposed relaxation of the exceptional circumstances test could 'water down' the control of development within the Holiday Accommodation Areas.
- The Supplementary Planning Document does not address the issue of HMOs within Holiday Accommodation Areas.
- The viability assessment needs to take account of the size of business premises.
- Requests from a small number of guesthouse owners to be removed from the Holiday Accommodation Areas on the grounds of poor viability.

The comments made that directly relate to the Supplementary Planning Document are considered to be relatively minor. Only a small number of site specific comments were received regarding inclusion or exclusion from the areas.

In terms of the concern expressed about the policy being watered down, officers consider the introduction of the viability assessment (refer Appendix 4c) provides greater clarity and detail for those businesses located within the Holiday Accommodation Areas, yet still retains the Council's control over changes of use. The viability information (refer Appendix 4c) that is required to support a planning application will be proportionate to the individual scale of the application.

In terms of the issues raised about HMOs in the Holiday Accommodation Areas, adopted local plan policy HN5 specifically states that conversions into HMOs will not be permitted. Any planning application for a change of use to residential (which

comprises a house or apartments) will need to meet the required standards set out in the Council New Homes From Old Places Supplementary Planning Document (residential design guidance).

In considering the representations received, it is recommended that there are no further changes to the boundaries or the text within the draft Supplementary Planning Document. The proposed final Supplementary Planning Document is set out in Appendix 4a.

#### 5.6 Issues raised not directly related to the Supplementary Planning Document

A large number of consultation responses were received around issues affecting the Holiday Accommodation Areas yet not directly relating to the Supplementary Planning Document itself. These include:

- Lack of mandatory accreditation standards for hotel and guesthouse accommodation
- Poor quality appearance of buildings
- Use of former holiday flats as permanent flats
- Need for green spaces and additional car parking
- Potential financial assistance to improve businesses
- Anti-social behaviour

These responses suggest there is a need for a more comprehensive strategy to address the problems faced in the Holiday Accommodation Areas. It may be appropriate for Members to consider the setting up a cross-service officer working group to address these issues.

#### 5.7 **Is the Corporate Delivery Unit aware of this report?** Yes

The Corporate Delivery Unit has been made aware of the report and has assisted in the framing of the consultation exercise.

#### 5.8 Does the information submitted include any exempt information? No

#### 5.9 **List of Appendices:**

Appendix 4a - Holiday Accommodation Supplementary Planning Document  
Appendix 4b Blackpool Holiday Accommodation Supplementary Planning Document Review 2016/17 - Consultation Statement (October 2017)  
Appendix 4c - Viability Template

#### 6.0 **Legal considerations:**

6.1 The Holiday Accommodation Supplementary Planning Document provides additional information to assist with the interpretation and implementation of Policy CS23 'Managing Holiday Bedspaces' of the Blackpool Local Plan Part 1: Core Strategy which forms part of the Council's statutory Development Plan.

**7.0 Human Resources considerations:**

7.1 The Supplementary Planning Document is being resourced by existing staff within the Planning Strategy Team.

**8.0 Equalities considerations:**

8.1 No adverse equalities considerations. The Holiday Accommodation Supplementary Planning Document will contribute to the Council priorities set out in the Council Plan.

**9.0 Financial considerations:**

9.1 The work in developing the Supplementary Planning Document being undertaken within existing budgetary provisions.

**10.0 Risk management considerations:**

10.1 The Holiday Accommodation Supplementary Planning Document provides further detail to the Local Plan Part 1: Core Strategy (adopted January 2016) which provide the statutory planning framework to enable and assist the delivery of Blackpool's future development requirements. The Council needs to ensure that it has a planning framework that is managing the reduction of holiday bed spaces within the borough which reflects the community and elected members priorities and needs. The latter could lead to an increase in appeals if applications are received proposing development which is not in line with the priorities and needs of Blackpool.

**11.0 Ethical considerations:**

11.1 No adverse ethical considerations. The Holiday Accommodation Supplementary Planning Document Supplementary Planning Document will contribute to the Council priorities set out in the Council Plan.

**12.0 Internal/ External Consultation undertaken:**

12.1 Consultation will be undertaken in accordance with the Council's Statement of Community Involvement and in accordance with the statutory requirements and regulations for Supplementary Planning Document preparation.

**13.0 Background papers:**

- 13.1 Holiday Accommodation Supplementary Planning Document (adopted March 2011)  
Blackpool Local Plan Part 1: Core Strategy (adopted January 2016)  
Blackpool Holiday Accommodation Supplementary Planning Document Review  
2016/17 - Stage 1 Technical Report  
New Homes from Old Places Supplementary Planning Document (2011)

**14.0 Key decision information:**

- 14.1 Is this a key decision? Yes
- 14.2 If so, Forward Plan reference number: 20/2017
- 14.3 If a key decision, is the decision required in less than five days? No
- 14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

- 15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No
- 15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed:

Date approved:

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1



**18.2 Date of Decision:**

**19.0 Reason(s) for decision:**

**19.1 Date Decision published:**

**20.0 Executive Members in attendance:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1

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## Appendix 4a

# **Holiday Accommodation Supplementary Planning Document**

**Adopted xxxx 2017**

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1	Introduction.....
2	What is the current planning policy for managing holiday bed spaces?.....
3	What are the aims of the Holiday Accommodation SPD?.....
4	Assessing the Holiday Accommodation Areas.....
5	Guidance for Holiday Accommodation Areas
	Policy on the Promenade.....
	Policy off the promenade.....
	Viability.....

Appendix 1: Background Documents

Appendix 2: Policy CS23: Managing Holiday Bed Spaces

Appendix 3: Key Promenade Hotel Frontages

Appendix 4: Main Holiday Accommodation Promenade Frontages

Appendix 5: Off Promenade Main Holiday Accommodation Areas

## 1 Introduction

**1.1** This Holiday Accommodation SPD is a first revision of the original Holiday Accommodation SPD which was adopted by the Council in March 2011.

**1.2** Holiday accommodation continues to be an important part of Blackpool's tourism offer and is vital to the resort's visitor economy. However, over the years tourism has changed. Whilst there has been an upturn in resort visitor numbers in recent years, Blackpool still has too many holiday accommodation bed spaces, with many businesses operating at marginal levels leading to a number going out of business or changing to inappropriate uses that are causing problems.

**1.3** In order to allow the reduction of holiday bed spaces to reach an economically viable level that supports Blackpool's tourism economy, Blackpool's Core Strategy policy enables more hotels and guest houses to change to residential use than before. This gives property owners more choice if they decide they no longer want to remain as holiday accommodation.

**1.4** In order to safeguard the strongest clusters of holiday accommodation in sustainable locations, we have defined **Holiday Accommodation Areas (HAAs)**, where restrictions on change of use apply. The policy is explained in more detail in this document, known as a 'Supplementary Planning Document' or 'SPD'. It is important to note that Blackpool is a holiday resort and the council continues to champion the tourism economy, recognising the contribution good quality holiday accommodation makes wherever it is located.

**The HAAs only define where holiday accommodation premises cannot normally change to residential use in land use planning terms. There are no "holiday zones". Holiday accommodation premises that are not within one of these areas (HAAs) are still part of the resort, but owners have the option to change to residential use should they no longer want to carry on as holiday accommodation.**

## 2 What is the current planning policy for managing holiday bed spaces?

**2.1** Policy CS23 of the Local Plan Part 1: Core Strategy (2016) 'Managing Holiday Bed Spaces' seeks to achieve an economically viable level of quality holiday accommodation (See Appendix 2).

**2.2** This policy allows more hotels and guest houses to change to residential use than before, encouraging a better balance of quality homes and holiday accommodation. In order to successfully manage this reduction and retain a sustainable level of holiday accommodation in the right locations with easy access to resort facilities and key transport routes, restrictions on change of use will continue to apply to properties located within the main holiday accommodation areas. Further details of these defined areas and related policy are explained in section 5.

## 3 What are the aims of the Holiday Accommodation SPD?

**3.1** The SPD has been produced to provide the required detailed guidance in relation to Core Strategy Policy CS23, including the precise boundaries for the HAAs. The key aims of the SPD are:

- To define specific areas of holiday accommodation to which Policy CS23 of the Blackpool Local Plan Part 1: Core Strategy (2016) should apply.
- To support an improvement in quality and reduction in the amount of holiday accommodation, which consolidates provision in the most sustainable locations.
- To maintain the promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- To provide a focussed supporting high quality holiday accommodation offer in the defined areas off the promenade.
- To encourage mixed neighbourhoods outside of the main HAAs, complemented by the 'New Homes from Old Places' SPD which provides guidance on residential conversions and subdivisions.

**3.2** No separate Sustainability Appraisal (SA) or Habitat Regulations Assessment (HRA) is required for this document, as this is covered by the SA and HRA for the Core Strategy (which can be viewed at: [www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)).

## 4 Assessing the Holiday Accommodation Areas

4.1 The defined boundaries of the Holiday Accommodation Areas set out in were assessed against the criteria set out in Table 1 below:

Table 1: Holiday Accommodation Areas Assessment Criteria

	Criteria	Description
<b>A</b>	Sustainable location	Well located to key attractions, the promenade and public transport
<b>B</b>	Predominance of active holiday accommodation uses	Concentrations of holiday accommodation in the street
<b>C</b>	Proportion of holiday accommodation which is no longer trading	Number of vacant hotels within the street
<b>D</b>	Street Character	Overall character of the street
<b>E</b>	Incidence of accreditation	Levels of visitor accommodation accreditation
<b>F</b>	Pressure for change – currently on the market	Number of properties currently on the market (October 2016)
<b>G</b>	Pressure for change – long term on the market	Number of properties that have been on the market for more than 5 years (since 2011)
<b>H</b>	Pressure for change – planning enquiries	Level of planning enquiries since 2011 for change of use to residential
<b>I</b>	Evidence of unlawful activity	Level of enforcement activity since 2011 for use of holiday accommodation for permanent residential purposes



## 5 Guidance for Holiday Accommodation Areas

### Policy on the Promenade

**5.2** The promenade is the resort's 'shop window' and makes an important contribution to Blackpool's holiday accommodation offer, with many of Blackpool's largest hotels being located here. Despite past decline in visitor numbers and some underinvestment in businesses and properties, the promenade remains the prime location for holiday accommodation. It also presents an opportunity for high quality residential accommodation on the seafront, which will help to support/complement investment in quality holiday accommodation, enhance the appearance of the promenade and improve Blackpool's housing offer.

**5.3** The Core Strategy policy for the Promenade comprises two key elements:

- a) Key Hotel Frontages
- b) Main Holiday Accommodation Promenade Frontage

### Key Promenade Hotel Frontages - Core Strategy Policy CS23 (3)

**5.4** The Key Promenade Hotel Frontages include a number of the resort's larger and best known hotels where existing holiday accommodation use will be safeguarded. Many of these hotels are listed buildings. In recognition of their architectural character and the important contribution which they make to the vitality of the promenade and the resort's heritage, the policy also seeks to ensure future development within these frontages is sensitively undertaken; in order to enhance the character and appearance of these key hotel buildings, whilst supporting their continuing use as holiday accommodation.

**5.5** Within the areas listed below and defined in Appendix 3, holiday accommodation uses will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort.

**5.6** This policy applies to:

- Queens Promenade frontage (from Cabin to the Gynn Square)
- Imperial Hotel, North Promenade
- The Crescent (242 – 280 North Promenade)
- Metropole, North Promenade
- Talbot Square Ibis Styles

### Main Holiday Accommodation Promenade Frontage - Core Strategy Policy CS23 (1a and 1b)

**5.7** The focus within the main holiday accommodation areas on the promenade is to support new or refurbished holiday accommodation and allow appropriate mixed-use developments that

provide high quality holiday accommodation/residential uses. These developments would need to meet high standards of design and deliver clear regeneration benefits.

**5.8** Within the areas listed below and defined in Appendix 4 proposals will be supported which provide a high quality holiday accommodation offer alongside a supporting new residential offer. Any application will be required to justify the proposed mix of holiday accommodation and residential accommodation within the scheme.

**5.9** This policy applies to:

- Norbreck Castle and Bispham
- North of Town Centre Promenade.
- Central Promenade frontage.
- South Promenade frontage.
- Pleasure Beach Promenade frontage.

## Policy off the promenade

**5.10** The off promenade Main Holiday Accommodation Areas are made up of a number of streets that are considered to be the most concentrated areas of holiday accommodation which are well located to access the resort's attractions.

## Main Holiday Accommodation Areas - Core Strategy Policy CS23 (1a and 1b)

**5.11** Within the areas listed below and defined in Appendix 5, change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted.

**5.12** Change of use will only be permitted in exceptional circumstances where:

- 1) Suitable evidence is provided to demonstrate to the satisfaction of the council that the business is no longer viable and has no reasonable prospect of continuing as holiday accommodation; and
- 2) The proposed use is compatible with the holiday accommodation uses in the street and provides regeneration benefits to the immediate area

**5.13** The policy applies to:

**The Cliffs** - Empress Drive, King Edward Avenue and Gynn Avenue

**North Town Centre** - focused on parts of Lord Street and Banks Street

**South Town Centre** - focused on Adelaide Street, Albert Road, Charnley Road, Hornby Road, Reads Avenue, Palatine Road, Hull Road, Vance Road and Havelock Street

**Foxhall** - York Street and Bairstow Street

**South Beach** - focused on Barton Avenue, Woodfield Road, Wellington Road, St Chads Road and Alexandra Road

**Pleasure Beach North** - focused on Dean Street and Station Road, Withnell Road, Osborne Road, Balmoral Road, Burlington Road West and Clifton Drive

## Viability

**5.14** In recognition of the significant viability issues faced by some holiday accommodation owners in the Main Holiday Accommodation Areas, the guidance makes an allowance for **exceptional circumstances** when a change of use may be considered acceptable.

**5.15** It must be demonstrated through a transparent and robust viability methodology that future holiday accommodation use of the property is no longer viable. The proposed use will need to be compatible with other holiday accommodation uses in the street and make a contribution to the regeneration of the wider area.

**5.16** Further guidance on the viability assessment information required to be submitted alongside a planning application for change of use will be available on the Council's Holiday Accommodation SPD web page.

**5.17** The viability assessment should be proportionate depending on the business size/number of bedrooms. It will require consideration of:

- Potential trading performance (rather than the existing or previous (if not trading) performance)
- Commercial acumen and how the business has been financed, in terms of establishing whether the existing operation is viable.

**5.18** Neglect or under investment of a property will not, on its own, be a sufficient reason for allowing non-holiday accommodation uses.

## Appendix 1: Background Documents

- **Holiday Accommodation SPD (March 2011)**
- **Blackpool Holiday Accommodation SPD Review 2016/17 – Stage 1 Technical Report**

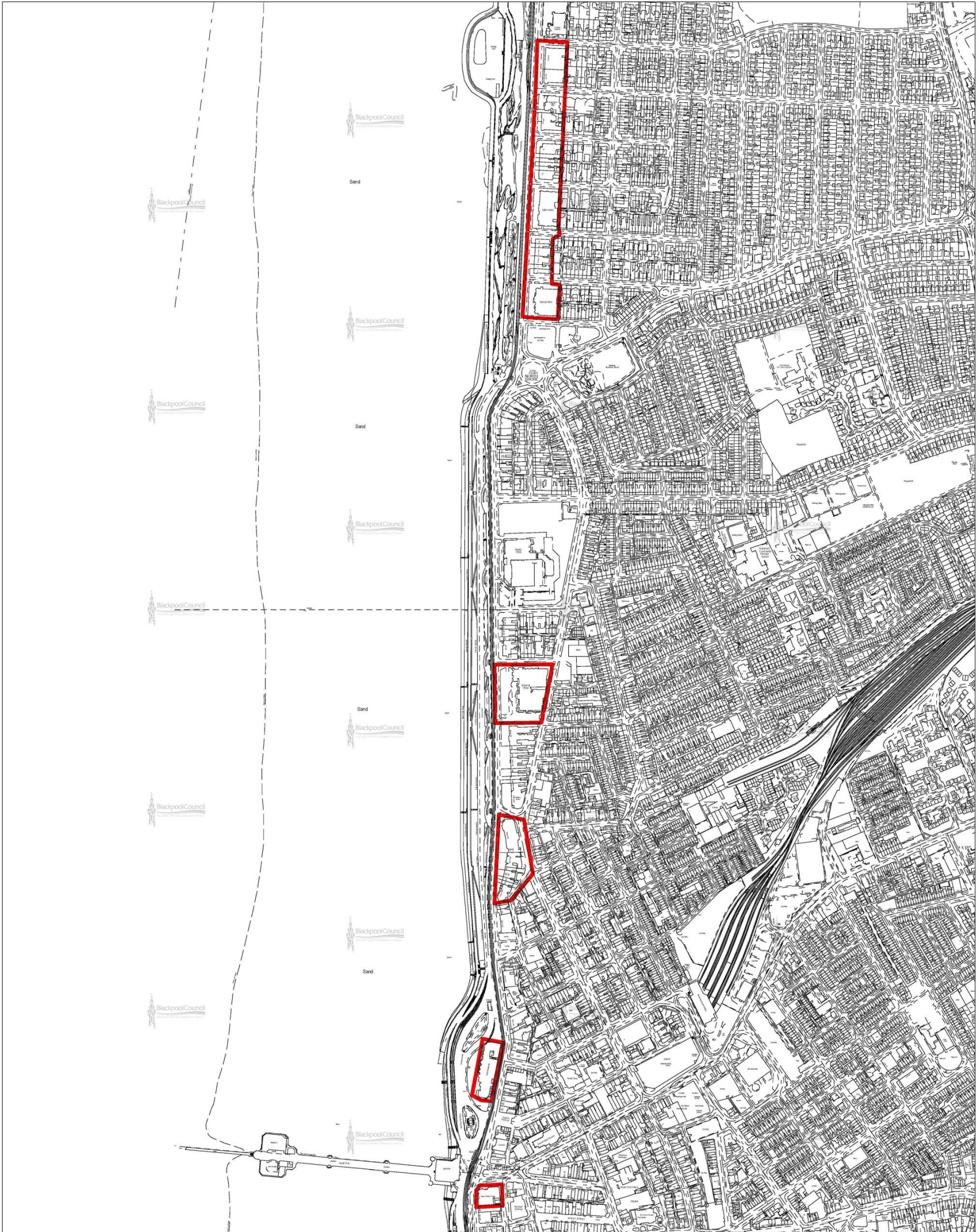
## Appendix 2: Blackpool Local Plan Part 1: Core Strategy

### Policy CS23: Managing Holiday Bed Spaces

To achieve an economically viable level of quality holiday accommodation, the following approach will be adopted to manage a reduction in the oversupply of poor quality holiday bed-spaces:

- 1) Within the main holiday accommodation areas defined in the SPD:
  - a. Existing holiday accommodation use will be safeguarded and new or refurbished holiday accommodation will be supported
  - b. Change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted unless:
    - i. Exceptional circumstances are demonstrated in accordance with the SPD, or
    - ii. In relation to a promenade frontage, the proposal would provide high quality holiday accommodation alongside a supporting new residential offer. Such proposals would need to comply with the requirements of the SPD.
- 2) Outside the main holiday accommodation areas:
  - a. Where existing holiday accommodation is viable its retention will be supported, including measures to improve the quality of accommodation
  - b. Change of use from holiday accommodation to permanent residential use will be permitted where proposals provide high quality homes which comply with the council's standards for conversions or new build, and relate well in use, scale and appearance to neighbouring properties.
- 3) Within the key promenade hotel frontages defined in the SPD, holiday accommodation use will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort.

### Appendix 3: Key Hotel Promenade Frontages



### Queens Promenade to Talbot Square

### Appendix 3: Main Holiday Accommodation Promenade Frontage

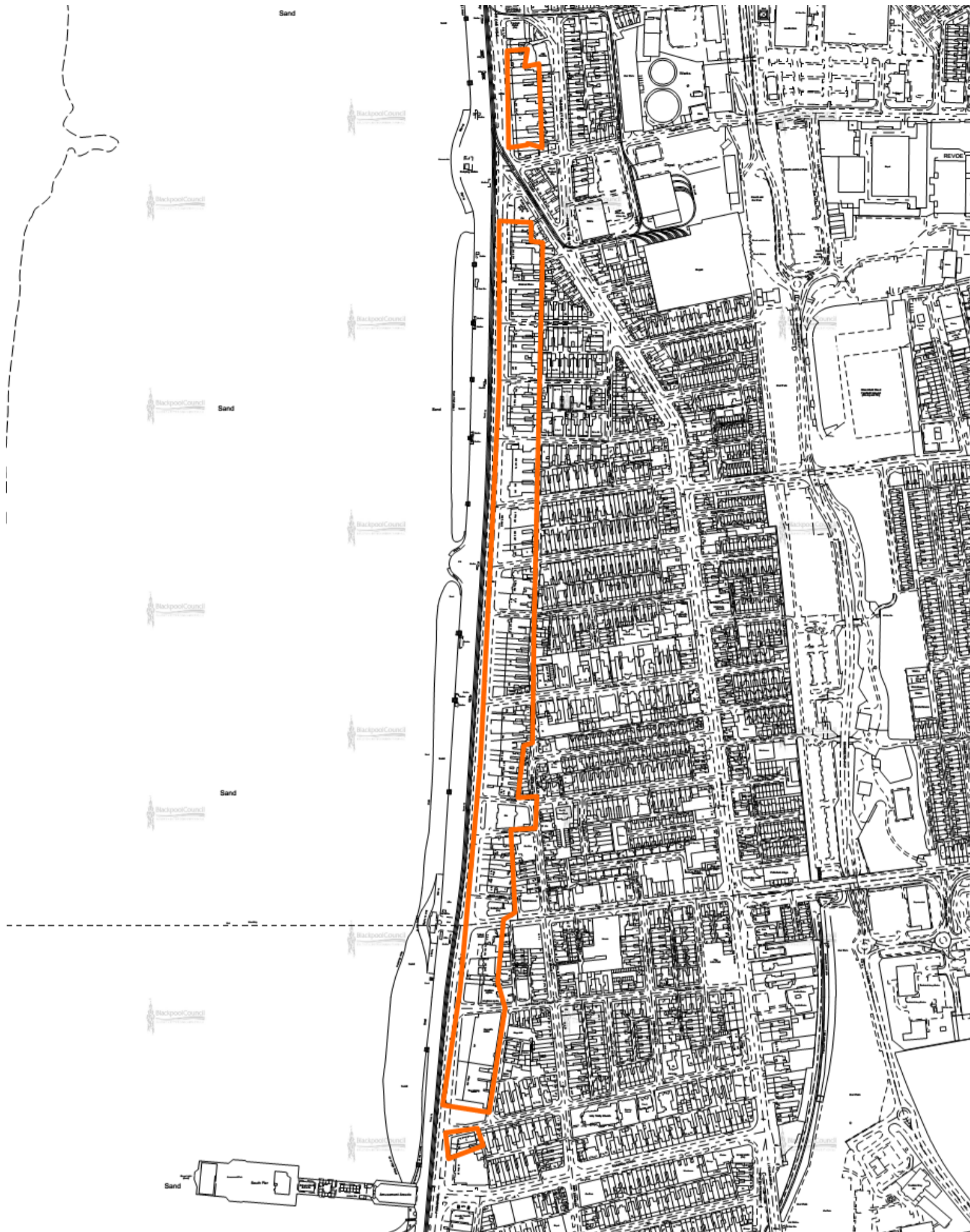


Norbreck Castle and Bispham

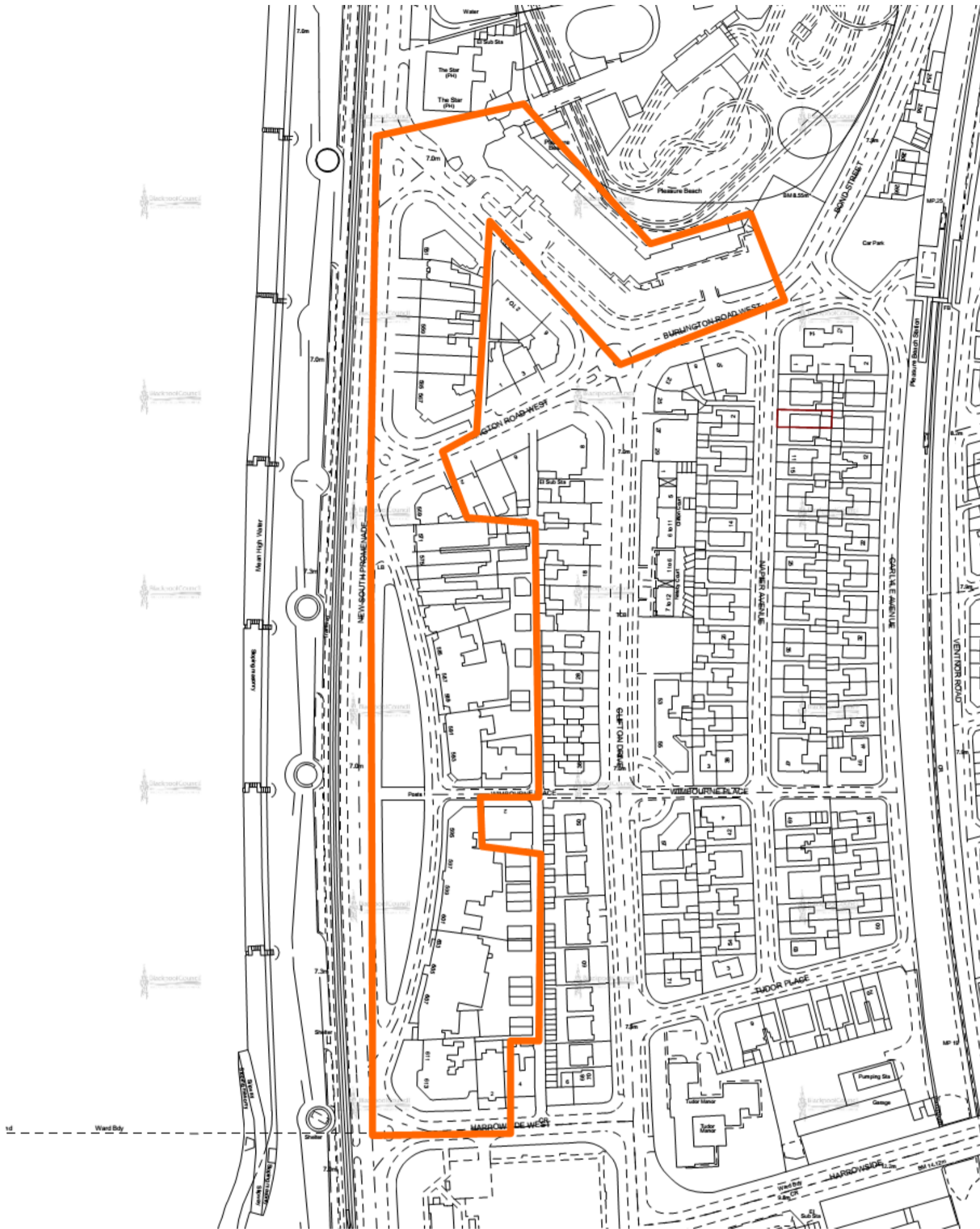




Gynn Square to Cocker Square

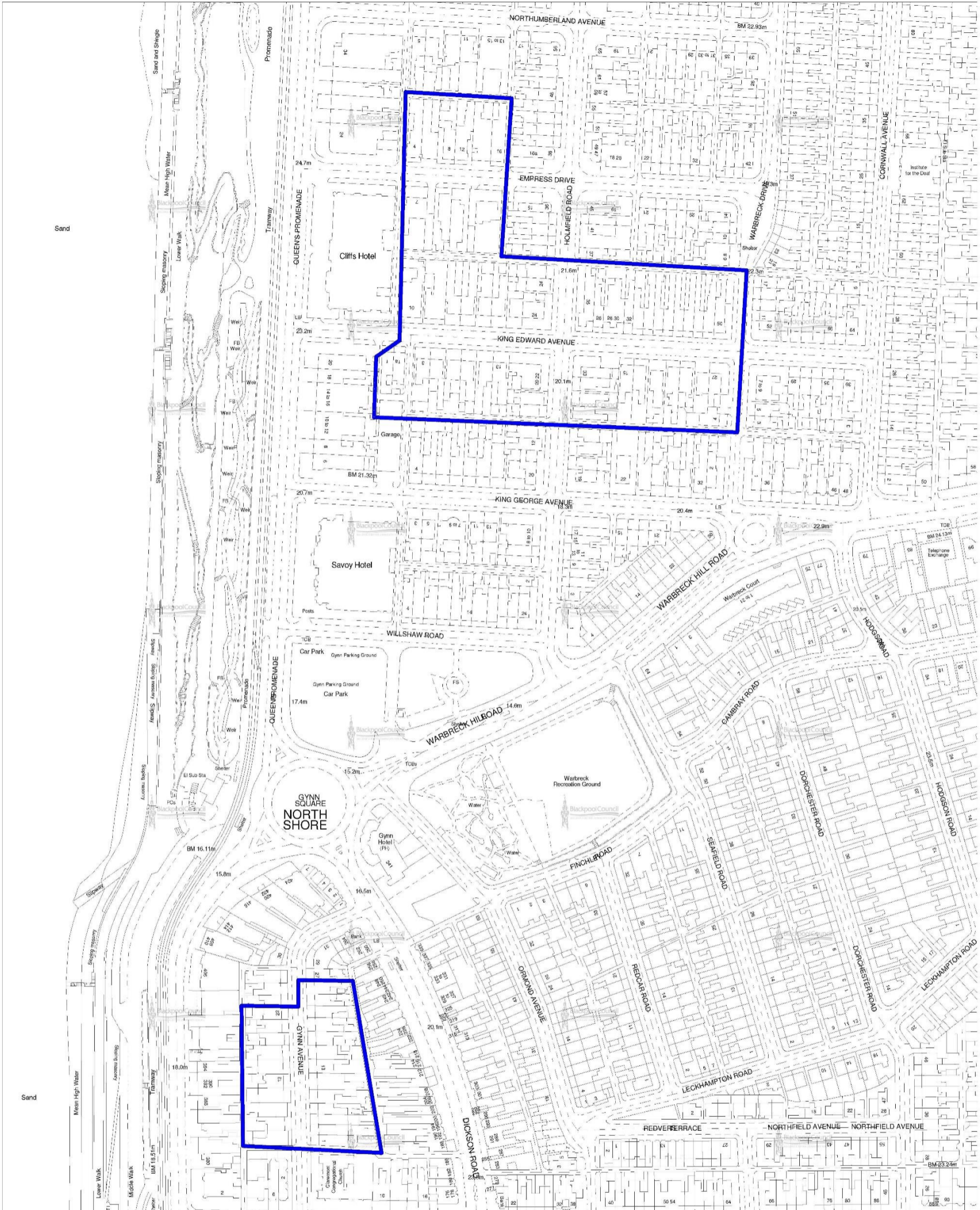


Foxhall/South Beach Promenade Frontage

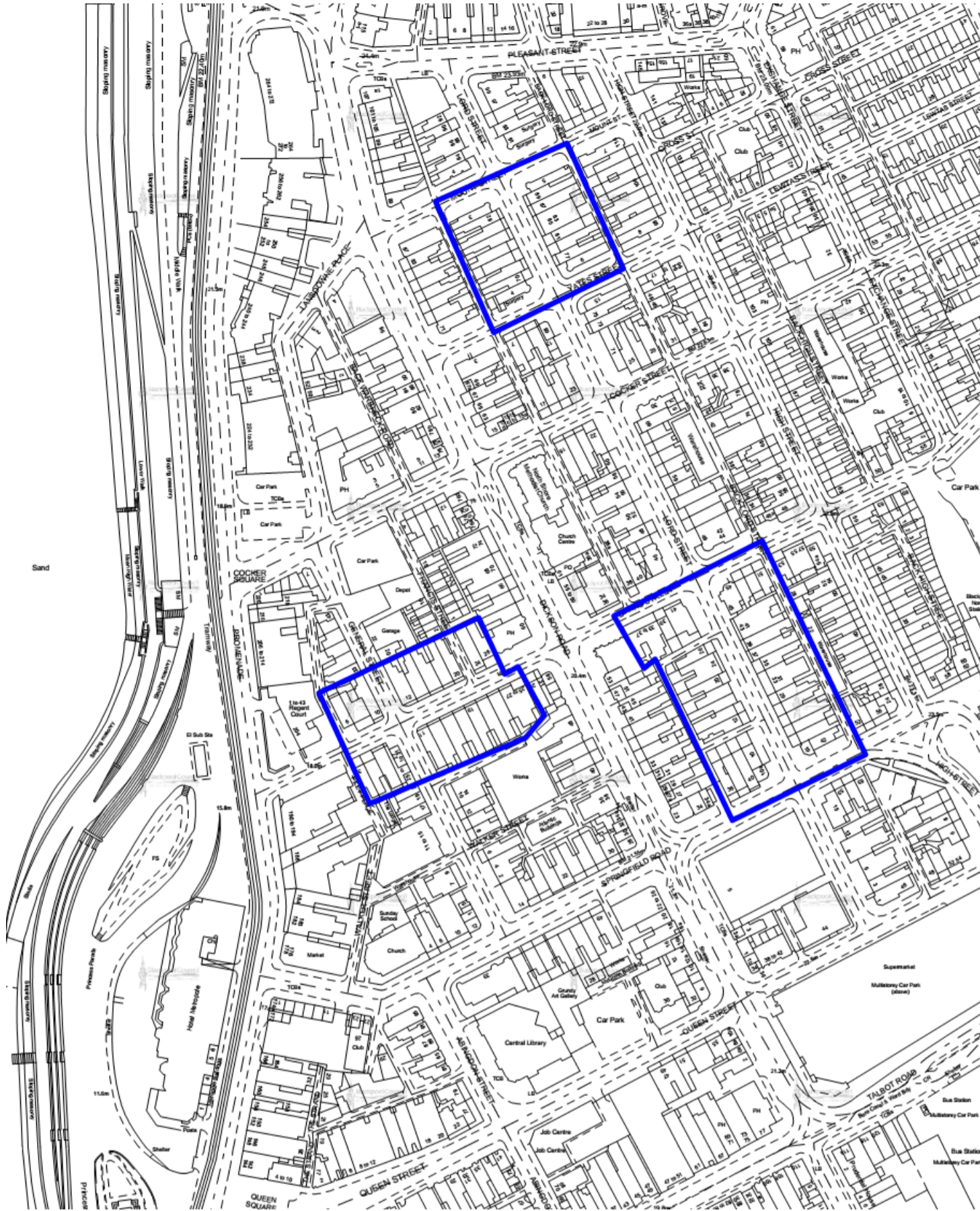


Pleasure Beach Promenade Frontage

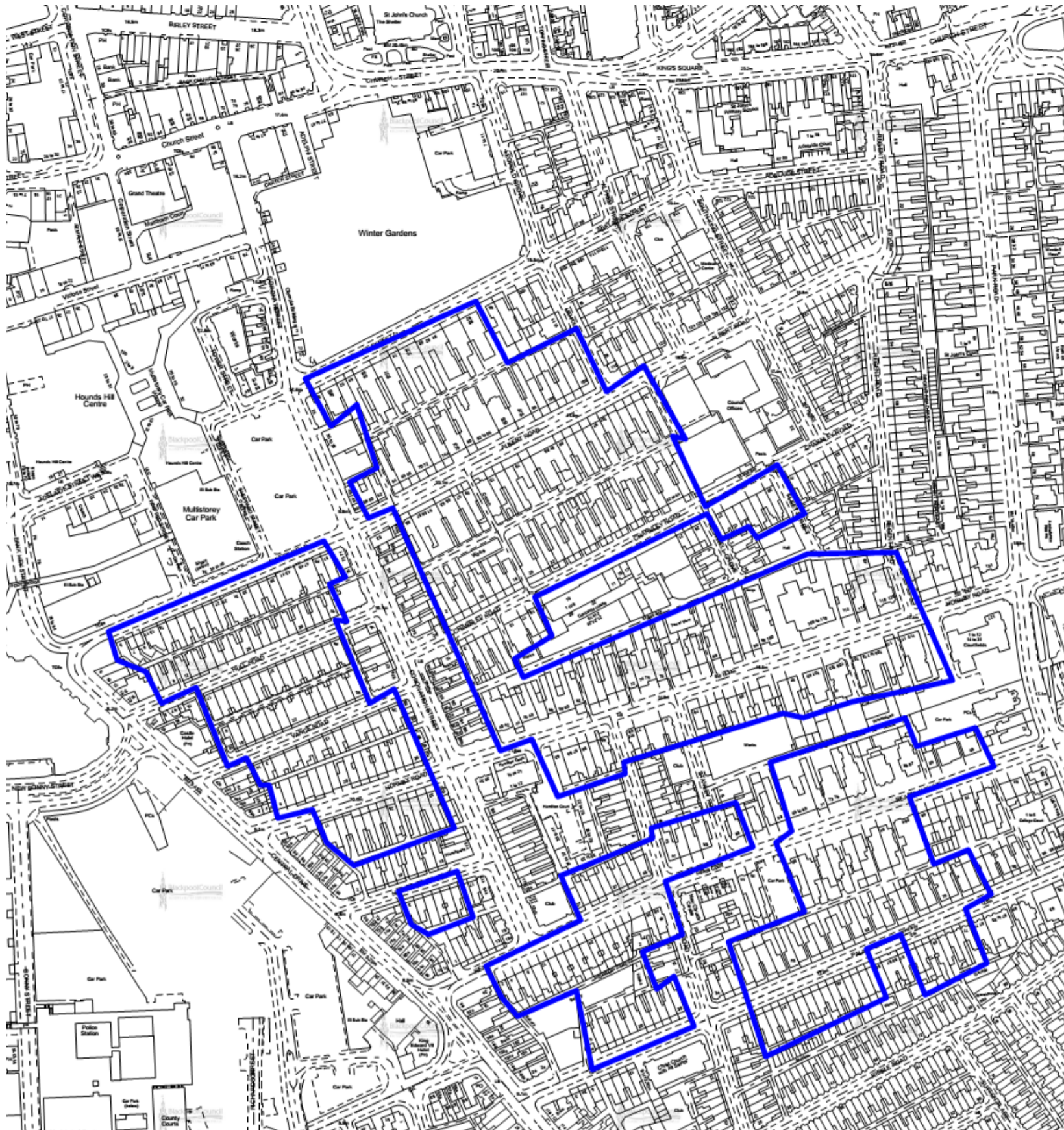
### Appendix 5: Off Promenade Main Holiday Accommodation Areas



The Cliffs



North Town Centre



South Town Centre

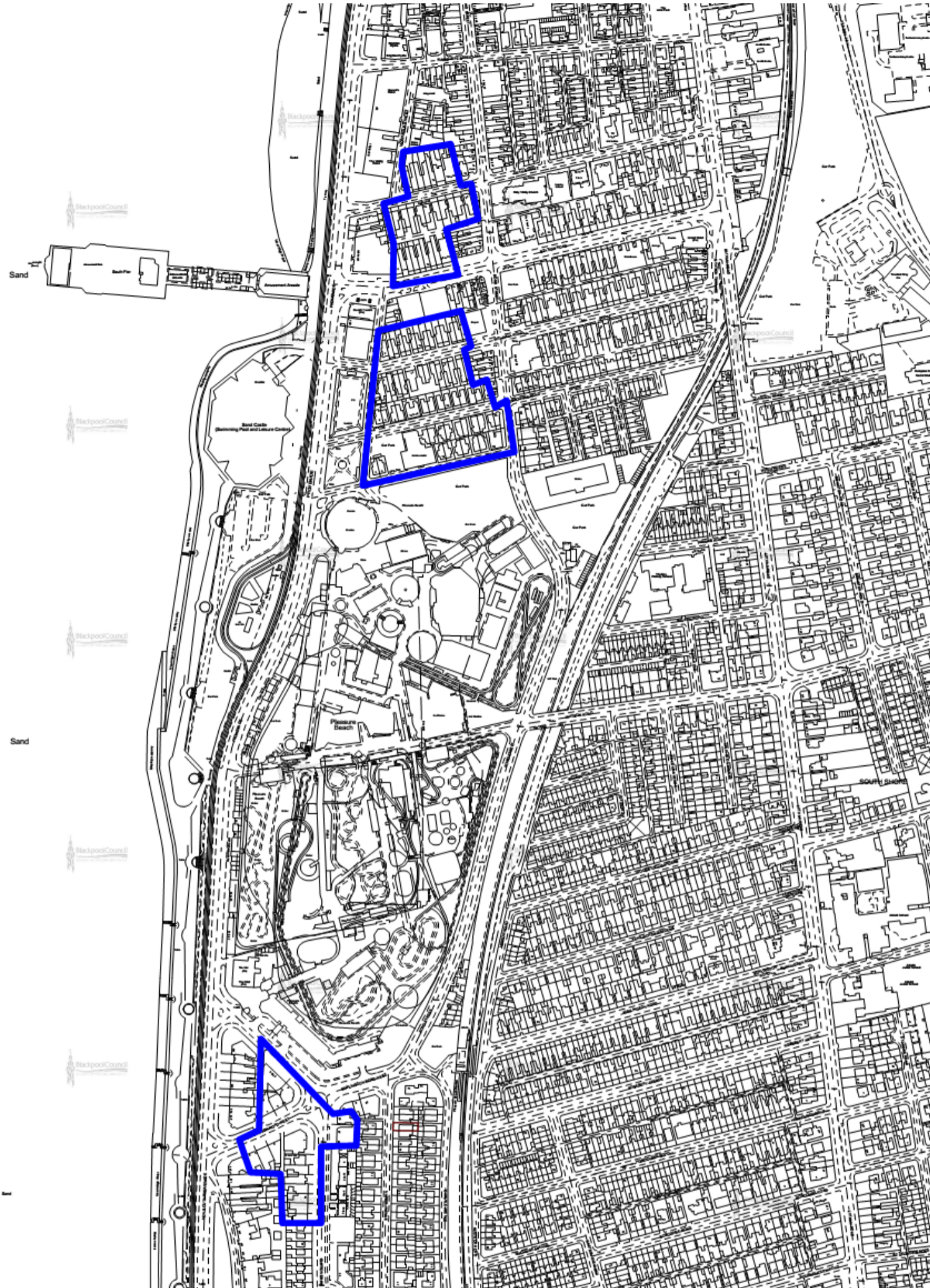


Foxhall



South Beach





Pleasure Beach

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Envision



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## **Appendix 4b:**

# **Blackpool Holiday Accommodation SPD Review 2016/17**

## **Consultation Statement**

**October 2017**

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**Appendix A:** Informal consultation responses summary

**Appendix B:** Formal consultation media

**Appendix C:** Representations received during formal consultation 2017

## 1.0 Introduction

- 1.1 This Statement of Consultation is prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 The statement relates to the Supplementary Planning Document (SPD) entitled Holiday Accommodation (HASPD) which was adopted by Blackpool Council in March 2011 and reviewed in 2016/17.
- 1.3 It was always the intention of the Council to undertake a review of the HASPD after five years of operation. The decision to undertake a review is also consistent with the Local Plan Part 1: Core Strategy Examination Inspector's recommendation for an early review. The review has allowed the opportunity to consider the following:
  - The effectiveness of the SPD after five years of operation.
  - The continued appropriateness of the boundaries having regard to changes which have occurred since 2011, such as land use, accreditation, physical condition etc.
  - The tests for exceptional circumstances to determine whether they are reasonable and effective, and to set out consistent guidance on viability test requirements.
  - Update the SPD to take account of new national and local planning policy context.
- 1.4 The review was also an opportunity to consult with key stakeholders including business owners and local councillors regarding the scope of any revised SPD.

## 2.0 Purpose of the HASPD

2.1 The HASPD has been produced to provide the required detailed guidance in relation to Core Strategy Policy CS23, including the precise boundaries for the Holiday Accommodation Areas (HAAs). The key aims of the SPD are:

- To define specific areas of holiday accommodation to which Policy CS23 of the Blackpool Local Plan Part 1: Core Strategy (2016) should apply.
- To support an improvement in quality and reduction in the amount of holiday accommodation, which consolidates provision in the most sustainable locations.
- To maintain the promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- To provide a focussed supporting high-quality holiday accommodation offer in the defined areas off the promenade.
- To encourage mixed neighbourhoods outside of the main HAAs, complemented by the 'New Homes from Old Places' SPD which provides guidance on residential conversions and sub-divisions.

## 3.0 Informal Consultation

3.1 During the review of the HASPD in 2016, and the preparation of the revised draft HASPD, informal consultation took place with a range of key business stakeholders, internal Council officers and Members of the Council.

3.2 The following key stakeholders were consulted and number of written responses were received together with a series of informal meetings:

- H01: Janet Jones, Gynn Avenue Hotels Association
- H02: Carol, Bay View Holiday Flats, King Edward Avenue
- H03: John Pate, Banks Street
- H04: Steve Blanchard, Mardi Gras/Chaps Hotel
- H05: Charlie Docherty & Gerald Walsh, Central Area Holiday Accommodation PACT & Central Blackpool Business Forum
- H06: Hazel Turner, Reads Ave Cluster Group
- H07: Mr R Panek, Palatine Road
- H08: Colin Johnson, Palatine Road, Core Strategy Examination attendee
- H09: Mr Ian Stanley, Palatine Road, Core Strategy Examination attendee
- H10: Colin, The Laurels, Reads Avenue
- H11: Dave and Sue, New Milton Hotel, Bairstow Street
- H12: Lynne, Aysgarth House, York Street
- H13: Michael Chappell, Alexandra Road West Community Action Group
- H14: The Stewart Hotel, Clifton Drive
- H15: Mick Grewcock, Burbage Holiday Group
- H16: Claire Smith, President, Stay Blackpool

3.3 Internal consultation with a variety of Council service areas (listed below) was also undertaken during the redrafting of the HASPD, together with a number of meetings with Council members.

- Blackpool Housing Company
- Planning Development Management
- Housing
- Licensing/Health and Safety Enforcement
- Planning Enforcement
- Housing Enforcement
- Visitor Economy
- Planning Policy

3.4 A summary of the outcome of the informal consultation, listed by issue, is set out in Appendix A. The Stage 1 review report refers to the consultation in Chapter 5.

## 4.0 Formal Consultation

- 4.1 The Council carried out a six-week comprehensive consultation on the proposed revised HASPD between 12<sup>th</sup> June and July 24<sup>th</sup> 2017 in accordance with Regulation 13 of the Town and Country Planning (Local Development) (England) Regulations 2012 and the adopted Statement of Community Involvement.
- 4.2 The Council publicised the consultation as follows:
- Email sent to all those on the Planning Consultation Database (over 1,000 individuals/organisations).
  - Leaflets sent to all those properties within the Holiday Accommodation Areas.
  - Email sent to all Councillors informing them of the forthcoming consultation.
  - Public notice in the Blackpool Gazette – Mon 12<sup>th</sup> June.
  - Twitter and Facebook posts to be published throughout the consultation period.
  - All documentation available online, at the Customer First Centre and all libraries.
  - Attendance at the Central Blackpool Business Forum Meeting on 28<sup>th</sup> June at the request of the Chairman.
- 4.3 Copies of consultation media are included in Appendix B.
- 4.4 Twenty-six representations were received during the formal consultation. The comments and the Council's responses are set out in Appendix C.
- 4.5 The main issues raised were:
- The proposed relaxation of the exceptional circumstances test could 'water down' the control of development within the HAAs.
  - The HASPD does not address the issue of HMOs within HAAs.
  - The viability assessment needs to take account of the size of business premises.
  - Requests from small number of guesthouse owners to be removed from an HAA on the grounds of poor viability.
  - There is a need for a more comprehensive strategy to address the problems faced by HAA businesses including:
    - potential financial assistance to improve businesses;
    - introducing a new licensing scheme for holiday accommodation businesses;
    - direct action by the Council to use its powers to Compulsory Purchase vacant properties, provide car parking/amenity spaces, and tidy up derelict and unkempt sites and buildings;
    - environmental improvements and alley gates.
    - Accreditation systems needs to be reviewed to take into account online bookings and reviews.



## 5.0 How the issues raised have been addressed in the HASPD

- 5.1 As part of the review, a considerable amount of data was analysed including the change in the amount of holiday accommodation in the resort. Overall the analysis showed that whilst the number of holiday accommodation premises and bed spaces has continued to decrease since the Visitor Accommodation Study baseline (2009), there is still an oversupply, supporting the continuation of the guidance.
- 5.2 The review highlighted that there have been a number of changes occurring within the HAAs since 2011 including business closures, deteriorating building condition, unlawful activity and properties on the market. Although the character of some of the holiday accommodation areas originally identified has changed there is still a need to maintain the existing boundaries to the defined areas.
- 5.3 Despite a number of site specific comments regarding inclusion or exclusion from the areas, no comments were received on the defined boundaries for the HAAs and they should remain.
- 5.4 The proposed changes to the text of the HASPD are relatively minor and although there was some concern expressed about the policy being watered down, the Council believes the amendments, including the introduction of the viability assessment, provide greater clarity and detail for those businesses located within the HAAs.
- 5.5 A large number of comments received refer to issues which although related are outside the scope of the HASPD review, such as the Council's approach to HMO's, licencing, accreditation etc. There is also reference to other actions which could be taken by the Council to improve and enhance the HAAs. The Council will consider these issues and complementary actions separately.



**Appendix A: Informal consultation responses summary**

Ref	Topic	Key Issue Raised
<b>a) The current position in the HAA's</b>		
001	There has been a decline in the inner area: HMO's are of a poor quality; there are life expired guesthouses (as evidenced in the Humbert study which showed a minimum figure).	Decline
002	All of the figures for the developers are based on yield. Taking a typical example of £85/week for say 5 units that would be say $85 \times 52 \times 5 = £22.1K/\text{year}$ multiplied by 10 gives a figure of £221K as a value for the 5-unit property which is huge compared with the typical market value of say £50-100K.	Yield
003	Can't separate HAAs from wider housing and benefit issues which inner Blackpool faces	Other issues at work not just land use planning control
004	Different views expressed from removing the areas completely to making boundaries tighter based on changes.	
005	Agreed issue of what to do with failed businesses who can't change use within HAAs is difficult.	Failed businesses in the HAA's
006	In terms of accreditation there are only now 2 schemes running in the town: AA and Visit England. 2 star is the minimum rating.	Accreditation
007	The quality of the conversions to residential are often of a poor quality.	Quality of conversions
008	Difficult to make standards set out in New Homes from Old Places SPD work.	Standards/quality
009	Commercially it doesn't make sense to convert to single family home outside the HAAs. Materials costs alone have increased by approx. 25%.	
010	Electrical improvements can prove expensive and sometimes too expensive so is used under health and safety legislation as a way to shut places down.	
011	In the last 12 months evidence of long term hoteliers going out of business and old guest houses being run by inappropriate people.	Further closures
012	Issue of general poor standard of conversions when inspected as part of enforcement enquiries. Seems like most people have done works themselves owing to costs – again raises issue of viability of converting to high standard residential use.	Quality of conversions
013	The reference to 'holiday zones' is confusing.	
014	There still remains a lack of general understanding about the purpose of the HASPD and the definition of HAA's.	Purpose of the HASPD
015	On face of it policy seems to have worked, but all is not what it seems to be – on the front face i.e. sun room, table, chairs etc but behind is an HMO or marginal/unviable businesses.	
016	Blackpool experiences some complex issues. Private rented sector is very weak for two bedroomed accommodation – desire for one bedroom accommodation.	Housing demand
017	New homes from old places SPD – up to 160m <sup>2</sup> . Crystal road for example – not much demand for 2 bed. 50% is one bed.	Housing demand
018	2:1 ratio is an issue for the council and the new company (as set out in the New Homes from Old Places SPD)	
019	planning land use policy is only one component and other complementary actions are required.	Complementary actions
020	Need the mapping evidence and information from enforcement re cases and issues. Needs to be more joined up and monitored regularly.	Joined up working

Ref	Topic	Key Issue Raised
021	Hotel closures - closures of hotels such as the Warwick and Palm Beach on the Promenade (Pleasure Beach HAA) - damage has been done.	Decline
022	Agents locally: Regular pool of agents in the town re plan apps but often not planners so don't understand the SPD and policy issues so don't look at the very exceptional circumstances or the viability issue.	Viability test
023	A typical 6-10 bed guest house is worth approximately £50-60K on the open market up to say £100K depending on the goodwill, trading position etc.	
024	Technology has changed things with online bookings (such as booking.com), smart phones, trip advisor, unofficial accreditation etc.	
025	Wet money is still important i.e. bar sales etc but when buying if wet sales are very high that raises concerns with banks and lenders.	
026	Budget hotel trade such as the Travelodge, Premier Inn, Ibis do want to be in Blackpool. Hamptons by Hilton (their budget chain) would like to come.	
027	Hotel chains don't want big, difficult and expensive conversions – prefer cleared sites.	
028	Market values are low but some do make it work	
029	There are success stories such as Blackpool Promotions. They have a number of hotels (such as the Royal Carlton, Boston, Doric, Queens Hotel Royal Seabank) and have recently taken over the Ruskin.	
030	Still demand for guesthouses but many do still need to go	Decline
031	HMO's and poor quality cheap guesthouses are ruining the market for everyone else. Boarded up former guesthouses and hotels do not give the right image for Blackpool.	HMO's
032	Council still working on the conference market.	
033	There are very few hotels that can accommodate conference trade – the Hilton is one.	
034	Marketing Blackpool's success re Prom, Tower and Winter Gardens works and attracts people only for them to find poor quality accommodation and poor environmental conditions- negates positive message	
035	Accreditation is an issue and something needs to be done to improve it across the area.	Accreditation
036	Blackpool needs to promote itself more widely and the excellent attractions it has.	
037	Some not bothered about the areas being defined on a plan i.e. the HAA's	HAA's
038	makes little or no difference in terms of controls and the market should decide.	
039	Residents/hotel guest house owners fought hard for its inclusion in the Cliffs area.	Need for HASPD
040	The inclusion in HAA used for protection	Need for HASPD
041	not being in the area would be very damaging	Need for HASPD
042	inclusion in HAA used to galvanise the community	Need for HASPD
043	Mixed views expressed on the need or otherwise for HAA's.	Need for HASPD
044	Common issue is the reference to "holiday Zones". There is a perception that being in is more important than being out.	Need for HASPD
045	Feels the HAA's are not working and have caused a lot of problems.	
046	Whilst the Holiday area boundaries are in itself good for tourism and lends itself to those seeking a location according to their needs I have to say that in my opinion has failed on a number of issues in our area.	
047	Namely the word "protected" has not been fulfilled as we now have a mixed accommodation zone where landlords are	

Ref	Topic	Key Issue Raised
	housing HMO tenants, B&B and Holiday flats allowing permanents to live free of any impact from our council.	
048	It feels worthless now, a non entity, as the quality of the area has gone down and it seems to us would take a change of attitude from the council to get on top of these important issues to make an impact in the right direction.	
049	Business owners within HAA's see it as a form of protection and would be an outcry if they were to go.	Need for HASPD
050	Good idea to keep them.	Need for HASPD
<b>b) Specific planning issues</b>		
051	Council have not approved any change of use within holiday areas, difficult to meet the exceptional character and viability test.	Little change post 2011
052	Change of use to residential inside the HAA's is difficult.	Little change post 2011
053	No current guidance given to applicants on viability. Only two viability assessments have been submitted.	Viability test
054	Change of use from holiday flats to flats (C3 to C4) doesn't need permission – but size up to 6.	
055	There are landlords/developers such as Clark and co who are looking only at holiday flats and pre 1994 permissions with no conditions just the old conditions re use at different times of the year – C3 use allows self-contained flats which are usually very small (just one room bedsit) to become one bed units i.e. a dwelling – effectively this creates a large HMO.	HMO's
056	Council's Planning Enforcement team are struggling to deal with all of the current cases – 600 cases on the go at present team of 6 (bigger than planning policy).	Enforcement
057	Viability tests are an issue. We now also have the national technical standards and this overrides the technical detail in parts in the New Homes SPD.	Viability test
058	Most/ many change of uses, approx. 100 per year since 2011 have been granted with conditions giving time to remove holiday related elements, including lounge and rear accommodation. These are beginning to be due for enforcement - could be a major issue - if don't take action may undermine overall policy approach.	Enforcement
059	Article 4 direction is possible for further controls but the problem is they are a sui generis HMO – the properties are too big – would need permission	Article 4
<b>c) Perception of the market</b>		
060	Guesthouses are closing down all of the time	Decline
061	some new owners have come in only to find they are next door to an HMO.	HMO's
062	Accepts there is an oversupply in the town but there is still a big demand to visit. People want better quality.	Oversupply
063	some areas share custom if they cannot accommodate themselves and try to keep it in the area.	
064	Some aiming at the high end of accommodation. 5 star quality.	
065	Pricing is an issue as prices are generally depressed.	Low prices
066	some of the hoteliers are now quite old and do not know whether to continue	Decline
067	Hotel currently empty as cant be sold due to lack of banks lending for hotels to be purchased, but do have lots of requests for purchase for a family home which is not permitted.	Decline
068	We are aware and do appreciate that all B&B can be different and do therefore attract different clientele, namely groups, stags and hens, who seem to have a free hand when it comes to carrying drink in public area's as they make their way into town from where they are staying. These Hotel owners have no interest in the Holiday area and do not police their	

Ref	Topic	Key Issue Raised
	clientele in the way they should, causing anti social behaviour in some cases.	
069	Going concern transactions are in the minority, typically values are freehold non-trading plus the value of the market perception of the goodwill typically 1 – 1.5 times the net adjusted profit / Earnings Before Interest, Tax, Depreciation and Amortisation (EBITDA) plus an element for the in situ value of the trade fixtures and fittings.	
070	The market has not changed significantly for some time and we are still in decline and performance is poor	Decline
071	There is little lending into this sector, banks have a poor appetite for it and properties offered at auction are often failing to attract bids.	
072	In terms of the freehold non-trading values these vary typically from £6,000 - £10,000	
073	do not envisage any significant changes in the micro or macro market.	Decline
074	There is still an over-supply.	Oversupply
075	Non-trading hotels are difficult to sell if there is no alternative use.	
076	As long as the bed occupancy rate and therefore the net profits remain as low as they are, do not see any new Lenders coming into the sector.	
077	Market displays little or no difference if premises inside or outside the HAA's	
078	The quality of hotels is determined by the efficiency of the operator and often their longevity.	
079	A hotel outside the HAA's but with good car parking provisions will trade better than one within an HAA without.	
080	Hotels of a like type (typically 8-15 bedroom guest houses with no car parking provisions) do trade better in the HAA's than those on the fringes.	
081	Changes in marketing (laterooms.com etc) enable the fringe hotels to obtain some increased booking as often the holiday makers do not know exactly where they are but they rarely re-book.	Technology changes
082	In terms of sustained trade those closest to the main attractions fare best.	
083	The HAA's are important to the market.	Need for HASPD
084	Assuming that there is no viable alternative use the hotels sell better within the central cores as the hypothetical purchaser will reasonably assume that they can re-establish the trade more quickly than a fringe location.	Need for HASPD
085	Deals have broken down on premises outside the areas as there is a perceived view that you have to be in the HAA's.	Need for HASPD
086	Losing the HAA's would be a disaster.	Need for HASPD
087	The trading potential of a hotel is determined by three main factors: location, established trade and quality/extent of accommodation offered.	
088	The difficulty banks have is that they do not really know the ability of a future operator.	
089	Often hotels do not succeed a change in ownership as the goodwill was personal.	
090	Once a hotel/guest house fails it is difficult to re-establish the business so therefore banks will "hedge their bets" and look for central cores where there is a better performance history and more chance of the property re-selling.	Decline
091	Very little funding available in any event but to get it you have to be in one of the HAA's	Lack of funding
092	Little demand for residential uses in the HAA's	
093	Within North Shore and sections of South Beach the inter-relationship between houses and hotels works but in the central core areas people would not normally buy a house.	
094	The HAA's need to keep as many guest houses/same use as possible to work. Where housing has been introduced	

Ref	Topic	Key Issue Raised
	due to no parking, no gardens etc they tend to attract the wrong type of people, DSS claimants etc and that leads to anti social behaviour and the two uses side by side don't work.	
095	The main problem is occupancy rates and tariffs.	Low occupancy rates and tariffs
096	The annual occupancy rate for some guest houses is as low as 25%-30% per annum.	Occupancy rates
097	Competition for tariffs means that the turnovers are modest and the net adjusted profits are often very poor representing a yield (by reference to the turnover) of 3% or 4% where the market would normally expect 12%-18% for commercially traded hotels.	Low tariffs
098	Some guest houses continue to sell as they operate as a "home with income" and the purchasers are factoring in the cost of their own accommodation.	
099	Some streets in the HAA's show a high percentage, sometimes a majority, that have ceased to trade economically.	
100	The "hangers on" are effectively pulling down the rest of the trade.	
101	It is difficult to "cull" the fringe operators as often the freehold properties are owned and the proprietors can afford to just meet the overheads.	Poor environment
102	The stock is ageing. Most of it is late Victorian, some of it Mid-Victorian.	
103	The cost of repairs and renewals would if properly effected be proportionately high.	High costs
104	The hotels cannot generally generate any super profit and not enough profit to undertake running essential repairs (wind and water tight/ envelope) as well as constructive upgrading.	
105	Deterioration is evident if you walk down any service road at the back of Hotels. The front of hotels are generally well maintained, the back of them tells a different story.	Poor environment
106	The decline in some streets can be directly associated with the use of the properties as small flats.	Decline
107	The properties which obtain a Certificate of Lawful Use are often marketed to investors at very attractive yields. The investors have no interest on the effect of adjoining properties and usually do not actively manage.	
108	There are some long established hotels with good profit levels which reinvest, acquire adjoining units and promote. There are some very good operators including coach contract operators mainly from Scotland.	
109	There is some inward investment from hotel operators elsewhere.	
110	Further decline but the areas of guest houses we have need protection.	Decline
<b>d) Specific Issues and concerns going forward</b>		
<b>i) HMO's</b>		
111	Council has discussed with other seaside places re the number of HMO's issue and holiday flats – concluded that Blackpool has a raft of holiday flat accommodation unlike other areas.	HMO's
112	Hoteliers are generally fed up with HMO's – legal and illegal.	HMO's
113	Case of 25 Vance Road went on for months/years but has been more or less resolved but the damage has been done.	Anti social behaviour
114	5 Charnley is another example and 107 Albert Road.	Anti social behaviour
115	16 and 20 King Edward Avenue causing problems at present	Anti social behaviour
116	Different views expressed about residential uses in the HAA's.	
117	Some felt that such uses are incompatible and lead to problems. Erodes at the core activity of guesthouses and	



Ref	Topic	Key Issue Raised
	changes streets. Leads to anti social behaviour, such as on Vance Road (no.25) which took years to resolve.	
118	Concerns over conversions to residential in the main promenade frontages, and illegal HMO's.	Quality of conversions
119	Some felt that high quality single residential use can work if all provisions are made including bin storage.	
120	There is currently a problem with poorer quality residential conversions	
121	introduction of further residential into the centre of an HAA would be very damaging and would destabilise the community.	
122	Many of the commercial premises such as shops are now closed and in poor environmental condition.	Decline
123	There have been massage parlours, prostitutes, illegal HMO's and lots of anti social behaviour.	Anti social behaviour
124	Decision to put the probation service (Lancs and Cumbria) building/offices right in the centre of the South Town Centre HAA is a bizarre one.	
125	Mixed use can work well in certain areas depending on property type, i.e. relatively small sized Victorian properties that can be converted into a single house.	Mixed use
126	Hoteliers don't really mind quality single residential use that has met all planning requirements, including removal of holiday accommodation elements, but they fear HMOs.	
127	Hoteliers equate residential with HMOs.	HMO's
128	a single HMO can bring down a whole street.	HMO's
<b>ii) Anti social behaviour</b>		
129	Massive problem of anti social behaviour.	
130	Whole street can suffer as a result.	
131	Example quoted of Joe Famosa, taking on old guest houses/hotels – offering poor quality non accredited accommodation at £6/night.	
132	Look ok on bookings.com but people shocked when they come so find something else – not as many complaints as you would think but what do you expect for £6/night.	
133	York Street a real problem (Foxhall HAA).	
<b>e) Comments on complementary actions</b>		
<b>i) Licensing generally</b>		
134	gives more powers over landlords.	
135	The fees generated help to fund the programme for the council – say around £500-900 per property and this helps to fund the scheme	
136	landlords often complain about the high cost of the fees but in the overall scheme of things it is not large.	
137	Allows the council to employ an anti-social behaviour officer and that person can take action. With more schemes the council has been able to employ more people and that can make a real difference on the ground.	
138	Housing also has a health and safety rating system under the 2004 act re category 1 hazards.	
139	It is noted that 60% of buildings have poor thermal quality i.e. they are very cold.	
140	This also looks at electrical and gas safety issues	
141	S215 relates to external appearance and condition	
<b>ii) Selective licensing</b>		

Ref	Topic	Key Issue Raised
142	In Blackpool there are only 160 "high risk" HMO's that fall into the mandatory category – however, just for comparison there are only 6 in Fylde. This only applies to "high risk properties" – they need to be 3 storey and involve at least 5 people.	
143	The council then has "non-mandatory licensing". From 2010 the council does not need the S of S consent under the 2004 act to introduce such additional licensing.	
144	HMO 'additional licensing' – this covers a wider range than the mandatory licensing and is at a lower level. 2 or more units and 3 or more people	
145	In inner Blackpool there are 13,000 properties of which more than 50% are private rented –	
<b>iii) South Beach selective licensing</b>		
146	covers all private rented in an area	
147	for HMO's there is mandatory licensing where the landlord must get a licence.	
148	It is then a 5-year licence and rolling forward with renewals etc.	
149	began in 2012 and runs to March 2017 – 5 year programme but unlikely to extend.	
150	Involved some 900 properties that require a licence.	
151	An evaluation is carried out at the outset and due the number of properties it takes a while to get it up and running.	
152	It is about management of the private rented stock and covers issues such as anti-social behaviour and uses police data.	
153	They need to comply with around 20 licence conditions such as gas safety etc plus some relate to the external appearance of the property.	
<b>iv) Claremont (ward) area selective and additional licensing</b>		
154	scheme launched in April 2014 to April 2019	
155	much bigger than South Beach and involves some 1,600 properties	
<b>v) Central additional licensing</b>		
156	The newest area will come into force for 5 years from July 2016	
157	additional licensing only	
158	plan to add selective licensing	
<b>vi) Other initiatives/programmes</b>		
<b>Blackpool Housing Company</b>		
159	Company set up for housing development – has a project management role and is LEP funded. It is relatively new, LB only officially in post since 1st May 2016.	
160	Relatively new	
161	23 units already letting – aim of 90 in the first year.	
162	Company using a variety of methods for delivery and trying to do exemplar schemes.	
<b>'transience programme'</b>		
163	linked to selective licensing which can give support to tenants.	
164	If someone has been thrown out by a landlord is, or has just been moving around etc.	
165	Intended to work with residents and try to find stability for them.	

Ref	Topic	Key Issue Raised
166	Council also has had the public health transformation challenge award. This is central government funded (£1.5m over 3 years) April 2015 to April 2018 plus the 'troubled families programme'.	
<b>'Clusters of empty homes programme'</b>		
167	CLG funded but has now finished. Used 2001 census data which showed 10% long term empty – in the inner wards this showed 8-9% but from the updated 2011 census proven right with 11-12%.	
168	LA's bid for the money - £200K max empty homes via HCA funding. 100 units in 2-year period March 2013 to March 2015 approx £1.6M.	
<b>"community protection warning notice"</b>		
169	Council can use "community protection warning notice" under the anti social behaviour act. Problem is that places close and just reopen under a new name.	
170	Would like to see a business case pushed forward for a local by-law such that controls could be put in place, i.e. min standards for people to run a guest house/hotel.	
<b>f) Site and area specific comments</b>		
<b>i) The Cliffs and Gynn Avenue</b>		
171	Older person's clientele, quieter end of Blackpool away from hustle and bustle of town centre and the pleasure beach areas.	
172	Current issue on King Edward Avenue re HMO's and anti social behaviour, but problem caused by holiday flats which can change to resi without permission.	Anti social behaviour
<b>ii) Lord Street Area</b>		
173	No real pressure, gay friendly end of town.	
<b>iii) South town centre</b>		
174	Palatine – both no's 53 and 56 appeals were dismissed and policy holding firm	
175	College on the other side of Park road (to the east) and this has had an effect of demand for student accommodation but this has now dampened down a little.	
176	Albert Road – interesting case where there is now a hotel on the ground floor and flats on floors above – makes for an interesting split of uses and issues of how you control through planning etc.	
177	Case of Palatine Road – wanted to be taken out. Had a petition and ignored by the council.	
178	Petition was put forward to the council regarding the whole of palatine road to be removed from the HAA signed by all of the hotels bar two who were unavailable at the time. Told by the council they had no time or bodies to look at it.	
179	Central areas around Albert Road and Charnley Road around Winter gardens need all the help they can get.	Decline
<b>iv) Foxhall</b>		
180	Also a conservation area so further layer of control but the two HAA's are only relatively small and involve just 2 streets.	
181	There is a current issue re 34/35 York street.	
182	Bairstow Street – 41/45 now a homeless persons home.	
<b>v) South Beach</b>		
183	Issue on 9/11 Wellington Road	
184	15 Barton avenue – holiday flats to permanent	

Ref	Topic	Key Issue Raised
185	Woodfield/St Chads – has external character	
<b>vi) Pleasure beach</b>		
186	Dean street – there is one conversion	
<b>vii) Promenade</b>		
187	The crescent frontage to the left (north) of Solaris is now in a sorry state.	Decline
188	The Warwick and the Kimberley hotels are now boarded up. The Henderson is not trading and there is an application for permanent flats.	Decline
189	Apart from central promenade, high quality mixed use should be allowed. Any change of use to be high quality.	
190	No single answer to the problems facing holiday accommodation businesses.	

**Appendix B: Formal consultation media**



**Appendix C: Representations received during formal consultation 2017**

Type: A = General Comments; B = comments on Q1; C = Comments on Q2

Statement of consultation – Appendix C

C1

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
001		Network Rail	A	Network Rail has no comments to make	Noted
002	a	J Graham	A	First of all, may I congratulate you on the quality and depth of this revised SPD. I realise that Blackpool has unique problems and challenges and it is no easy task to tackle them.	Noted
002	b	J Graham	C	I would respectfully add (as far as the viability test is concerned) that the physical size of a property may be included in the criteria when considering change of use to residential. There are a number of these Victorian "villa" type properties in the main holiday areas which were originally built as private homes and that even by today's standards, are modest in size and have been subdivided into "rooms" that are almost comical in their description as "bedrooms" .....These rooms are not even suitable for this use, let alone the impossibility of fitting en-suite facilities. These hark back from the 60's to quite recently where owners would sleep in the cellar and have one toilet/shower servicing the whole of the property. These smaller properties are clearly not and could never be viable today for this reason alone.	The viability assessment will be amended to include reference to the cost of required refurbishment/ improvements to meet appropriate modern space and regulatory standards
003		Historic England	A	No comments	Noted
004	a	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	B	Although so much of the facts within this document cannot be argued with, the way forward is extremely weak and can only result in further decline. There are catastrophic levels of negative impacts currently destroying Blackpool's proud heritage, particularly in the Central Holiday Area. I cannot see that this document appreciates the severity of the issues, and as such I object to the proposal which I see as a watering down of the Holiday Areas which will only generate more issues.	The Council fully appreciates the nature and scale of issues facing holiday accommodation in Blackpool. The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
004	b	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	Clearly what is needed is strong and stable leadership which works for the many and not the few. To achieve this Council must make bold decisions now and enhance the relationships with the communities of the holiday areas.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	c	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	Things which are destroying the areas: (i) The state of many buildings within the area: Council needs to act faster to issue 215 orders. Giving advice and support at the early stages of the process, directing owners to the many agencies that advise and the Council loan facilities where appropriate. This must be rigorously managed and should enforcement be	Section 215 Notices: The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

Type: A = General Comments; B = comments on Q1; C = Comments on Q2



No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				needed then this must be seen through completely.	
004	d	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(ii) Vacant properties: Though many fall under the above, Council must use all the powers available to them to encourage the property owners to have the facilities of the building fit for purpose and actively advertised for appropriate usage at a sensible rental level. We can no longer allow properties to be purchased and left to decay for 4 or more years so that planners have little option to allow planning permission for alternative/inappropriate usage.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	e	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(iii) HMO's: the decision to introduce the licensing for HMO's is a positive step. However, the need for owners to improve their properties cannot be stressed enough. Critically the number of "placed" tenants must be controlled so that properties do not become a bail type hostel by back door methods. Ideally properties taking placed (police, charity, council, etc.) tenants should have on site management. All HMO's should externally have a plaque stating either the owner and/or the management company including contact details including out of hour emergency details, which must be up to date and fully serviced. There should be no external advertising sign-age especially in the main holiday areas, and no reference to DSS welcome. Such tenants should be better vetted and should be made fully aware of their responsibilities both within the property and in the neighbourhood.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	f	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(iv). The idea of benefits by the sea has been used inappropriately by companies to fill substandard rental properties. Tenants very quickly become disillusioned by the properties and either become a negative impact on the area or leave and the landlords or their agents replace them with less than appropriate tenants. The impact is both negative on the area but also an extreme drain of the resources of police, emergency services and council support and enforcement teams	The issue of the impact of housing benefits on holiday accommodation areas is fully recognised by the Council.
004	g	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(v) Appropriate retail & service businesses should be actively encouraged back into main streets of holiday areas e.g. Coronation Street	Coronation Street lies outside the HAAs and retail and service businesses are possible subject to other adopted Core Strategy Local Plan policies. Within Holiday Accommodation Areas the revised exceptional circumstances test for change of use within HAAs allows for compatible uses subject to other adopted Core Strategy Local Plan policies.

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
004	h	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(vi) The accommodation stock needs to be far better supported, and those which fracture the rules need appropriate action taken at the earliest possible chance. Giving a level playing field, to benefit all.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	i	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(vii) Visit Blackpool and the big venues do an amazing job attracting events and shows etc. but without the support for the accommodation sector the town may as well just have an enormous car park for day visitors	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	j	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	(viii) Visit Blackpool needs to appreciate that the star accreditation system fails at 3 stars and below. There are also so many issues with the system, not least that the public do not understand the meaning of the various levels and the categories. The "Blackpool Approved" scheme rather than a stepping stone to the stars is the only way businesses can remain connected with Visit Blackpool without the obscene demands/rules of the stars. It must be remembered that the enormous number of decent smaller accommodation offer dedicated Blackpool Ambassadors at a ratio the bigger hotels cannot match. The owners of these properties as well as making visitors/guests extremely welcome also promote the resort and all that is going on, both during their stay and upcoming events. These individuals are the back bone of the visitor experience, bringing visitors back time and again. Though this group of people do not go out to seek recognition, they certainly deserve real support. Due to the failings of the Visit Blackpool on line booking offering, the likes of Booking.com have taken over and huge truckloads of cash leave the town daily destined for Europe. Worse still is that this company supports the very worst accommodation which trade on the verge of legality. The towns accommodation providers are trapped with property they can only give away at bargain basement prices, or pile money into property knowing that it has no impact on the value of the property and as such they are wasting money	The report recognised that only 17% of the 674 trading premises in the HAA's are accredited under the only two recognised national systems, Visit England and the AA.  Accreditation: The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	k	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	As stated a significantly different way of doing things is so desperately needed, and the plan being consulted on lacks any substance. The Central Holiday Area being fragmented allows negative issues to be embedded in the area, which has, and continues to cause real significant issues. One suggestion for a way forward could be a Central Holiday Area Management Partnership with total control over	Management Partnership: The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

Type: A = General Comments; B = comments on Q1; C = Comments on Q2

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				<p>the area, including the bits currently not in the fragmented area. Though there could be similarities to the adjacent BID area, so much is different and expanding the BID would not be appropriate. This must not be seen as a revenue generating concept, but something that gives real appreciable benefits to the whole area. The CHAMP must have significant representation from the business community.</p> <p>The CHAMP should have powers to tackle all the issues that are destroying the area, strongly backed up with the enforcement teams of Blackpool Council.</p> <p>(i) The right to hold landlords to account, in a constructive way and hopefully reducing the need for enforcement</p> <p>(ii) The right to hold property owners to account, again in a constructive way so we no longer see vacant properties deteriorate before our eyes. Having robust enforcement using 215 orders at hand is essential, to resolve the years of neglect and decay.</p> <p>(iii) The right to hold businesses to account where current enforcement is currently none applicable. So, businesses that have poor customer services and quality can be challenged.</p>	
004	l	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	The list goes on and on. The town's heritage as Britain's favourite seaside resort is seriously at stake. Bold decisions need taking now, to stem all the negativity. Creating an environment where businesses have the confidence to invest and people will want to come and stay in significant numbers once more and residents can live and bring up families safe in the knowledge that the following applies and is enforced: - "Under Article eight and Article one of the first protocol to the Convention on Human Rights, a person is entitled to the right to respect for private and family life, and the peaceful enjoyment of his/her property"	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
004	m	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	A	As the town moves forward looking towards the eventual development of the central car park, plans need to start now, consulting with the communities most likely to be affected. Dependant on projects being considered there is likely to be a demand for extra car parking provision. One area which would immediately be an easy target would be the area to the west of Coronation Street. However, this is a stronghold for guest houses, B&B's and small hotels. The area directly to the East of Coronation Street has suffered extreme inroads by the HMO type accommodation. This must be reversed as soon as possible as this could easily become the front line of the accommodation sector should the west be required for car parking. Steps must also be taken to protect the area from property	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

Type: A = General Comments; B = comments on Q1; C = Comments on Q2

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				speculators just interested in a fast buck, buying property and sitting on it without bringing any value to the area	
004	n	Ian White, The Chorlton Hotel, 38 Hull Road (South Town Centre)	C	I have no issue with the document, so long as the conditions are strictly adhered to	Noted
005	a	The Allendale, 104 Albert Road (South Town Centre)	A	I can understand the need to reduce bed spaces and the need for a holiday zone, which needs to be enforced taking properties outside of the zone to be purely residential and refusing planning on such properties to business (hotel/B&B) is needed and is the correct way for the council to move into the future.	It is important to understand that the HASPD does not set out 'Holiday Zones' but Holiday Accommodation Areas (HAAs). Within HAAs change of use from holiday accommodation use to other uses is controlled. Outside of the HAAs the Council will make a decision on new applications for holiday accommodation on their merits having regard to the NPPF and the adopted Core Strategy Local Plan.
005	b	The Allendale, 104 Albert Road (South Town Centre)	A	However properties in the holiday zones, changing use is a more difficult proposition, many of the hotels even in the holiday zone struggle at times with financial issues, but also the change of use of some properties to HMO's, flats /apartments etc yes in certain circumstances this seems to be a good option however a lot of the people attracted to these properties are not the up and coming business types the people who want to make a positive mark on the world, rather they are shall we say the people whose mark on the world is that of waiting for the rest of us to pick them up each week and give them financial assistance. The latter leads to a multiplication of issues in the properties and also problems in the areas, e.g. a 20 bedroom hotel converted to eight two bedroom apartments and yes you could get six or seven working and positive families who want to make a difference to the economy and future, however if you add into that property a less than friendly negative family one where the world owes them a living you will have problems, because it's very easy to lose the positive six families as they have money and jobs and options to get to the better areas. Whereas the negative family has no options they have no money to move no future to progress to and in effect as per council's issues with trying to clean up other properties and remove undesirable tenants the law on their side.	Change of use within HAAs will be permitted if a strict viability test is met and the proposed use is compatible. High quality residential uses which meet the standards set out in the Council's adopted New Homes from Old Places SPD may be appropriate. This SPD deals specifically with the conversion of holiday accommodation to high quality residential use.

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				<p>This then creates a void in the property which can then only be filled with more negative families so then you get a whole property full, now ok if this were in a residential area then visitors / holidaymakers are not presented with this criteria and they see Blackpool as a place to bring the family, However if this property is placed in the holiday zone or on one of the main roads for hotels, surely you can see this reflects badly on the tourism industry in Blackpool and if tourists decide that they don't want to stay near that property then you start to get issues like we have now 3 or 4 hotels in the holiday zone closed and boarded up which again tourists do not want to see so again this reduces business and makes more properties change of use applications which causes a downward slide. If this happens in and around the Winter Gardens your foreign visitors to the dance competitions to the rebellion festival and other such events will decline which will hit your pocket hard if the events side of things declines also, you have some good ideas.</p> <p>The Conference centre is a great idea and will provide extra possibilities but walking from your accommodation to the Conference no one wants to feel uneasy threatened or even accosted for money by negative people and you as council members should agree on that point, and no matter how well the tenants are vetted screened etc it only takes one to start the effect rolling and if you lose all of the business around the Winter Gardens how long before the Winter gardens feels the down turn and loss of trade??? So I have to object to the possible change of use from Hotel/holiday zone to tenanted accommodation or housing association properties within that area.</p>	
006		G. Matthews, 11 Dean Street (Pleasure Beach)	B	<p>We wish to express our wholehearted support for Blackpool councils Draft Revised Holiday Accommodation SPD proposal. We congratulate Blackpool Council for having the courage and forward thinking, in the realisation that the current amount of holiday accommodation available far exceeds the present demand. By taking up these proposals it will benefit Blackpool as a whole. The present consensus is that tourism alone will not bring in the revenue required for Blackpool's financial prosperity and growth. Blackpool needs to diversify more with regards to its future prosperity. In a nutshell, it needs to re-invent itself somewhere along the lines of Brighton. We believe that these present proposals will go a long way in helping to achieve that aim. Once again well-done Blackpool Council.</p>	Support Noted
007	a	Northern Star, Lord Street	A	<p>I solely support Blackpool Borough Councils proposed changes to Holiday Accommodation within the Town Centre. I do however make a comment with</p>	Noted

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				regards to the outlined Planning Document with regards to the Main Hotel Accommodation Area.	
007	b	Northern Star, Lord Street	A	I note from your plan for the North of the Town Centre that the area known as 1-15 Lord Street Blackpool has been taken out of the current Main Holiday Proposal though the rest of Lord Street (the bottom end) remains within those boundaries	The review of the current HASPD has not altered any boundaries. No properties have been taken out. The properties at 1-15 Lord St were not included in the HAAs in 2011.
007	c	Northern Star, Lord Street	A	Reading your proposal this seems to go against what you are trying to achieve within the planning framework. The area of 1-15 Lord Street has a higher proportion of better standard holiday accommodation than the bottom end of Lord Street. All the properties in this area have been under the same ownership for at least 10 plus years, none I believe are currently for sale on the open market and all but one is trading as holiday accommodation.	The review of the current SPD has not altered any boundaries. No properties have been taken out. The properties at 1-15 Lord St were not included in the HAAs in 2011.
007	d	Northern Star, Lord Street	A	The area at the bottom end of Lord Street has many properties trading as Private Accommodation whether this is with planning consent or not I cannot be sure. The access to 1-15 Lord Street is direct from the train station via the underground tunnel, which assists holidaymakers in crossing the busy road. The holiday accommodation is located opposite Funny Girls and other busy bars and cabaret areas again without effecting busy roads. Access to the Promenade and the Town Centre is more accessible from 1-15 Lord Street than it is to the bottom end of Lord Street.	The review of the current SPD has not altered any boundaries. No properties have been taken out. The properties at 1-15 Lord St were not included in the HAAs in 2011.
008		J Horsfield	A	I wanted to clarify the following - Proposed amendments to the exceptional circumstances test allowing change of use within Holiday Accommodation Areas - Specifically Central area. And plans for business rates re-introduction for small business hoteliers in line with the 2027 Blackpool Strategy?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
009		51 Palatine Road (South Town Centre)	A	I am owner of 51 Palatine Road Blackpool last year the house next door to me burnt to the ground and next doors become a bigger attraction than Blackpool tower my house is 51 next to 53 Palatine Road Blackpool FY1 4BX it's on edge of holiday zone and for obvious reasons it can't be made into a trading guest house again so please in your review slightly amend so we are no longer in holiday zone for accommodation I don't want to make a long-winded letter has I hope common sense will prevail.	The revised exceptional circumstances allow for businesses which can prove a lack of viability to change to a compatible use subject to other adopted Core Strategy Local Plan policies.
010	a	Four Rooms, 60 Reads Avenue (South Town Centre)	A	We came to Blackpool with the intention of purchasing a home with an income. We were advised by many of the public not to do so as the quote was "Blackpool is a dump". We decided to push on and had found the perfect property for ourselves which we purchased in June 2015. Since purchasing we have	Noted

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				renovated the property which is now our home and a thriving Bed and Breakfast. We have gained No1 position on Trip Advisor and Booking.com and No10 for England on Booking.com, also we now enjoy 5 Star Gold Status with visit England.	
010	b	Four Rooms, 60 Reads Avenue (South Town Centre)	A	The situation that now concerns and worries us is that "The Council" is placing vulnerable tenants and allowing properties within "The Holiday area" to become HMO's which then in turn creates so much grief to the Residents and Visitors alike. Visitors and families would like a break away from the troubles at home only to be faced with much worse when they arrive in Blackpool. We now have to advise our guests of what and where to avoid for their own safety due to the high rise in Alcohol and drug related crime, anti-social behaviour and prostitution. The police are also powerless to prevent most of these incidents or even deal with them correctly to a satisfactory manner. This is the image that visitors to Blackpool take away with them which is then spread around the country and mud sticks.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
010	c	Four Rooms, 60 Reads Avenue (South Town Centre)	A	The Council need to buck their ideas up and have a proper sensible vision for this town and not a blurred vision [consultee raised issues about Council website].	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
010	d	Four Rooms, 60 Reads Avenue (South Town Centre)	A	I can almost guarantee that the way things are being dealt with, none of the plan will actually be carried out correctly and more of the unwanted problems will be moved in to inevitably destroy Blackpool and make it into one of the poorest drug and crime Ghetto's in the country with a greater lack of visitor numbers that you are quoting at this time.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
010	e	Four Rooms, 60 Reads Avenue (South Town Centre)	A	Raises concern regarding the issue of Blackpool as a failing town filled with drunks, rough sleepers, drug users and prostitutes and increased levels of crime.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
010	f	Four Rooms, 60 Reads Avenue (South Town Centre)	A	There is a requirement for a licensing system to allow people to trade as holiday accommodation in the same manner as food safety standards. If this type of licence was in place many of the poorer quality bed and breakfasts would either raise standards or sell forward to others who could breathe new life into the area. At this moment anyone can buy or lease a B&B with no standards in place which in turn again leaves Blackpool with its lingering bad name that is difficult to shake.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
010	g	Four Rooms,	A	I am just one resident living in hope that things will actually change for the better	Noted

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		60 Reads Avenue (South Town Centre)		instead of the continuing downward spiral. I would love to be proud of the council but I am just continually feeling extremely let down.	
011		Belvere Hotel, 53 St Chad's Road (South Beach)	B	We would like to change our hotel business into our home, we have not made a profit in the business for 10 years and have really struggled to stay in business, we have also recently had another baby, so we now have 3 children, we like living on St. Chads Road and would like to stay here, my husband has a full-time job in Blackpool so we don't want to move. It would benefit us very much if we could convert to residential property and stay in the place we love. I would like the council to review our street and allow us to make these changes as at the moment our street is not allowed to change to residential property and I think this unfair.	The revised exceptional circumstances allow for business which can prove a lack of viability to change to a compatible use.
012	a	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	B	Much of what is proposed is worthy of support - provided it is delivered in practice. And it is in this connection that we have reservations and thus feel obliged to formally submit our comments.	Noted
012	b	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	The Consultation Document correctly refers to HMOs in King Edward Avenue creating issues with anti-social behaviour and states that "the problem is caused by holiday flats which can change to residential without permission". (Stage 1 Report February 2017-10 of 11, Ref 172). It is true that, as residents of King Edward Avenue, we have first-hand experience of anti-social behaviour/ HMOs and know full well how detrimental this can be to the character of an area, adversely impacting on businesses and homes.	Noted
012	c	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	It is, however, the unsupported statement that holiday flats can change to residential without permission which causes us acute concern. This is particularly so when the residential use happens to be an HMO. Over a significant period of time we have been given, by Council Officers, a variety of reasons intended to substantiate a basis upon which statements such as this can be justified. The lack of consistency and clarity has been frustrating. We have therefore sought professional advice - which has included Counsel's Opinion and also that of the DCLG (Department of Communities and Local Government). The results, coupled with our own research, are that the Council can, in fact, take action against such un lawful changes in use, thus safeguarding its own Planning	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				Policies relating to Holiday Accommodation.	
012	d	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	The planning related headings under which the issues of change of use can be addressed are: a) Change of use from self-contained holiday flats to residential (permanent flats): The Council would appear to take the view that self-contained Holiday Flats and Permanent Flats fall within the same Use Class C3. In December 2014 the Chief Executive, as resolved by the Council, wrote to DCLG to seek a change in legislation so that Holiday Flats would fall within Use Class C1 (Hotels, Boarding Houses and Guesthouses) making it possible to more effectively control such changes in use and thereby protecting adopted Planning Policies. The response sent by DCLG in February 2015 was that "it would be unhelpful adding regulation at national level" and that the Council should consider "using existing powers more creatively to overcome the Issues raised." This suggestion/recommendation was in line with our own findings, which had previously been passed on to Council Officers. For example we established by further research that, in this connection, East Lindsey Council (which geographically includes Skegness and Mablethorpe), The Royal Borough of Kensington & Chelsea and the Lake District National Park (and very likely others) regard self-contained holiday flats as sui generis, which requires the submission and approval of a planning application for any such change of use.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	e	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	b) Change of use from self-contained holiday flats to HMOs (as defined in the Housing Act 2004). In order to more accurately target the King Edward Avenue issues, we also consulted DCLG specifically on the question of change of use from Holiday Flats to HMOs (s. 257 - defined as such by the Council). DCLG response was that in 2010 planning regulations introduced a C4 use class for small scale HMOs.....and that LARGER HMOs (more than 6 residents) are SUI GENERIS (see para a) Our belief is (and this has never been contested by the Council) that the HMOs in question are "large HMOs".	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	f	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	c) It is also significant that the conversion standards for Permanent Flats (Council Policy "New Homes from Old Places") are higher than those generally found with holiday flats and particularly HMOs. Therefore, by allowing this type of change of use to become established results in the spread of sub-standard housing - a warning which was specifically flagged in "Planning Guidance 10" (adopted by the Council in June 1999), and also the Local Plan warns that problems of this kind will arise if mixed incompatible uses are allowed.	The comments made are outside the scope of the consultation on the review of the SPD and the council will consider these separately.
012	g	F Lawton and M Higgins,	A	d) Irrespective of different reasons for immunity from enforcement action given in the past, the stance currently being taken by the Council is as given by the Chief	The comments made are outside the scope of the consultation on the review

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		The King Edward Avenue HMO/Planning Group		Corporate Solicitor (in July 2016) - "the Council is satisfied that the properties contain multiple self-contained apartments each in of itself a single dwellinghouse. Therefore the Council Is convinced that the self-contained apartments are not, and never have been, an HMO under the planning system". We have been unable to establish a legal basis for this assertion. Clarity of all aspects of HMOs was provided in the Housing Act 2004. Post 2004, changes were introduced which brought HMOs (as a use) within the remit of the planning system (see para b). We believe that those changes are clearly stated and that the intent was that they be applied even- handedly to all HMOs by all Councils.	of the SPD and the Council will consider these separately.
012	h	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	e) Anti-social behaviour: The Planning update, June 2017- "Anti-social behaviour" section- states that the Neighbourhood Services and the Police etc deal with this type of problem. This is accepted.	Noted
012	i	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	However, whilst respecting the action taken by those Agencies, our experience shows that it does not provide an effective solution. It targets specific incidents as they arise - and even if the troublesome tenant then quits the flat - the ensuing lull invariably is then followed by the problems flaring up again - and again. Our believe is that ASB is clear indication, in fact and degree, of incompatibility and should be dealt with as such via the planning system, as indicated above. The Planning update - "Planning isn't helping" section, refers to HMOs as being unlawful- If this is the case, then why haven't the Council done something about it? It adds to our frustration and is not at all helpful for the Chief Corporate Solicitor to state, as she did, that HMOs do not cause harm! - another inconsistency. And this "opinion" seems to be at odds with many other Councils which are adopting policies on "sandwiching and clustering" so as to be able to further control the adverse impact of HMOs.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	j	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	f) Article 4 Direction (Planning update letter- "Jargon-buster - Permitted Development rights (PD)") - this states that PD includes change of use between houses and HMOs: This is not in accord with advice which we have been given - which is that large HMOs are not regarded as PD - they are sui generis and, therefore, can be controlled by planning (see para b), i.e. the "Use Classes Order" which is applied by Councils nationally.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
012	k	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	g) Immunity from planning enforcement - 4 and 10 year rules: We believe that the 4 year rule has been both mis-interpreted and mis-applied in King Edward Avenue. How can the Council justify applying the 10 year rule to a nearby property in Holmfield Road and then apply the 4 year rule in King Edward Avenue?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	l	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	h) Permitted Development - general observation: Council Officers have by statement or implication ruled that HMOs and/or Holiday Flats are Permitted Development. If this is the case, then why did the Council accept and process an Application for a Certificate of Lawfulness for one of the HMOs in King Edward Avenue, when, on the basis that any such change in use is PD, it clearly was not necessary	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	m	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	NOTE: Representatives of the King Edward Avenue HMO/Planning Group have recently met with Officers of the Council for the purpose of discussing this Consultation and explaining our concerns (which are as detailed above). Our hope was that the Council would be able allay our concerns by indicating that it would take more positive action against future changes of use of the kind which have proved to be so troublesome in the past. Frustratingly and notwithstanding the extent to which our opinions, as indicated, have been fully supported by comparable facts - and also based upon advice given by Counsel and DCLG, - no assurances were forthcoming. Our understanding, confirmed to be so at the meeting, was that this Revised Holiday Accommodation SPD Consultation was intended to be a review of the Holiday Accommodation SPD which was approved and thereby adopted as Council Policy in March 2011. During the period immediately prior to March 2011 we were led to believe that once adopted, that policy would enable the Council to deal more effectively with the HMO problem. This was subsequently proved not to be the case. Also, it seems to us that the current Revision Document does not address these shortcomings nor does it give clarity to the Council's perceived reasons for not being able to take action against changes of use from Holiday Flats to either Permanent Flats or HMOs. The Council view Holiday Flats and Permanent Flats as being in the same Use Class C3. This means that the use can change from one to the other without the need for planning permission. This is contrary to the advice given by the Council to 3 residents of King Edward Avenue.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				It is also at odds with para a). Also, based upon the Council's ruling detailed in para d), we can but conclude that there are no "large" HMOs in the resort! This is also at odds with para b).	
012	n	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	Objectively, our sole purpose of our meeting with Council Officers and submitting this response to the Consultation is to enable us to plan for and safeguard the future by protecting our businesses/homes. There are a number of Holiday Flat businesses still operating as such in King Edward Avenue at present- if, say another 2 change to HMOs - then it is likely that this will tip the balance and put the viability, trading base and appeal to holiday makers at serious risk. For Council Officers to say that they will deal with the problem if and when it arises is not acceptable. An Assessment Viability Template can only be applied if a Planning Application is submitted - however, since the Council regard such changes as "Permitted Development", a Planning Application will not be made because it is unnecessary to do so. (note: the 2 HMOs in King Edward Avenue changed use from holiday flats without permission!). We are convinced that the problems referred to in this submission are replicated in other parts of the resort. We have concluded that we cannot "turn the clock back", but that we must safeguard the future. Irrespective of the fundamental differences of opinion between us and the Council, the only clear cut, completely effective way of resolving this problem (change of use from Holiday flats to HMOs) is for use class C1 to be amended to include holiday flats - thus making it an all embracing "Use Class" for Tourist Accommodation. To this end, we offer to work closely with the Council to make a formal submission to DCLG for the requisite changes and will lobby as necessary to achieve a result. As an issue requiring an effective resolution, it is not just a local / parochial concern - it relates to tourism accommodation throughout the town. It is our belief that other related organisations such as StayBlackpool and Blackpool Chamber of Trade etc would be supportive of any such action taken and we will willingly take steps enlist that support.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	o	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	C	a) In principle the Viability Template is acceptable - provided there are no limitations or selectivity on when and where it can be used. However, in some areas it lacks clarity and could therefore be misleading - for example:- i) It would appear that the Template can only be applied if a Planning Application is made.	Noted. The template will only be used as part of a planning application for change of use.

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012	p	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	C	ii) The Viability Template cannot be applied for any change of use regarded as Permitted Development - which includes HMOs - and it is this use which poses the threat to the character and appeal of the Holiday Accommodation areas.	The template will only be used as part of a planning application for change of use. Permitted development means that an application is not required.
012	q	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	iii) In the Planning Update Letter, June 2017- Jargon Busters "Permitted Development" - the reference to "change of use between houses and HMOs" is vague and misleading. This should be clarified and cross referenced how and when an Article 4 Direction can be applied.	Noted
012	r	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	iv) The Council will not allow change of use from Use Class C1 (Hotels and B&B's etc) to residential. This is not an issue as the reasoning is clearly understood. However, the Council, as indicated in above in the previous section, does not require planning approval to change use from self-contained Holiday Flats to Permanent Flats or HMOs (s257). The Council should be more open about this crucial issue. For instance - upon what legislation is this based? or if it is Council Policy, when was it adopted?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	s	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	v) "Clustering and Sandwiching" as applied to HMOs is not mentioned in the Consultation documents or the Planning update. Is this an oversight?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
012	t	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	vi) Selective Licensing is mentioned in the Planning update which states that it "is currently under way in South Beach, Claremont and Central areas" - and it also points out how helpful this is in effectively dealing anti-social behaviour. If Selective licensing is so effective, why isn't it underway throughout Blackpool? In the past, we have been given "target" dates - which were then deferred - when it is likely to be introduced in Warbreck? Our information in this respect, is that it is unlikely to be introduced in any further parts of the resort. We believe that if Selective licensing is mentioned in any Council Document then the future	Up to date Information on housing licensing can be found on the Blackpool website: <a href="https://www.blackpool.gov.uk/Business/Licensing-and-permits/Housing-licences/Housing-licences.aspx">https://www.blackpool.gov.uk/Business/Licensing-and-permits/Housing-licences/Housing-licences.aspx</a>

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				intentions in this respect should also be provided. Unless these issues can be resolved or clarified, then there must be reservations as to whether the Viability Template, as worthy as it is in principle, can be applied in a completely equitable and open manner.	
012	u	F Lawton and M Higgins, The King Edward Avenue HMO/Planning Group	A	The statistical information quoted for King Edward Avenue is inaccurate and it therefore misrepresents the true position in a number of ways.	Further information requested from the group to ascertain what information is incorrect. The discrepancies relating to the information recorded for King Edward Avenue do not impact on the overall outcome of the SPD boundaries.
013	a	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	My brother and I have owned and managed to Chesterfield on Wellington Road for over 27 years. We as a family have invested thousands of pounds on the building and the business. Although we decided against an officially accredited rating, we have won a National Award, and have been shortlisted for another. Our reviews on Trip Advisor Facebook, Eviivo and others are consistently excellent and reflect the high standards we have continued to maintain in increasingly difficult circumstances. We are not 5 star, but we offer good quality. B&B accommodation at an affordable price.	Noted
013	b	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	We believe there is definitely a demand for what we provide despite the downturn in fortune across the resort as a whole. Our neighbouring properties are however, a different story altogether. Number 7 Wellington Rd (formerly Home Leigh holiday apartment) is owned by a private landlord who has obviously exploited the 'loophole' referred to in the SPD review 2016/ 17, Enforcement cases, 4.31. It was holiday flats but under current ownership of property consists of several small flats and bedsits for permanent residents and the owner does not live on the premises. The property is in a state of disrepair both front and rear and looks terrible. The inhabitants are constantly changing and often of dubious character.	Noted
013	c	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	Number 3 Wellington Rd (formally Montrose Hotel) is now an example of the type of properties described in the SPD review, Enforcement cases, 4.32. The owner does not live on the premises, and is largely absent. This property is also in a state of disrepair both front and rear and we believe is vulnerable to squatters and arsonists.	Noted
013	d	Chesterfield Hotel, 5	A	We fully appreciate the difficulty of returning these properties to their original use and understand that it's probably not possible. We propose the council should	The comments made are outside the scope of the consultation on the review

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		Wellington Road (South Beach)		insist on private landlords making significant improvements to properties such as number 7 Wellington Road in order to protect the overall quality of the street scene.	of the SPD and the Council will consider these separately.
013	e	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	With regard to empty properties such as number 3 Wellington Rd we propose that the council make compulsory purchase of these eyesores and public health hazards. Rather than try to convert such properties to residential homes (which would be very costly and may prove difficult to market) we propose that it would benefit the whole area if they were demolished and replaced with open green spaces and additional car parking facilities for the existing businesses that are still trading	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
013	f	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	We at number 5 Wellington Road and our neighbours at number 1 Wellington Road take great pride in the properties and it will be hugely beneficial to us if we could purchase or rent compulsory purchased land adjacent properties from the council for use as gardens and parking spaces for the benefits of our guests. Such action would be in keeping with policy CS12, 3.4 "opportunities for selective intervention to improve the quality and mix of existing housing stock" and Policy CS12, 3.5, addressing the "lack of open space and private gardens" and Policy CS12, 6.12 "compatible with the accommodation uses in the street and provides regeneration benefits to the immediate area" and would enable us to improve the quality of our accommodation to better meet the demands of the modern tourist.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
013	g	Chesterfield Hotel, 5 Wellington Road (South Beach)	B	We would also support proposals in Appendix 1: CS23 that requires change of use proposals to be restricted to the provision of high quality homes which comply with the Council's standard for conversions on new build and relate well in use, scale and appearance to neighbouring properties.	Support noted
013	h	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	We would welcome the introduction of a scheme to financially assist currently trading properties to reduce the number of bed spaces further by reducing the number and increasing the size and quality of the letting rooms we have available. This could possibly be in the form of long term interest free loans or grants from the Council to be spent only on appropriate building improvements in renovations	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
013	i	Chesterfield Hotel, 5 Wellington Road (South Beach)	C	With regard to the viability template I can understand why the applicants need to provide evidence of having tried to operate and market their business. However, if they are unable to provide such evidence and are refused permission to change use what will happen if they continue to deteriorate or unable to improve matters and falling to disrepair? Will the council then intervene and compulsorily	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				purchase these properties? Will they then be marketed as viable businesses? Or will they be demolished and used for open spaces gardens and additional parking facilities for businesses still trading? We believe that the last option must be the best way forward to reduce the number of bed spaces and at the same time improve the appearance of the resort.	
013	j	Chesterfield Hotel, 5 Wellington Road (South Beach)	A	The fact that Blackpool is traditionally a seasonal resort appears to be overlooked. Many successful businesses in Blackpool operate for limited number of months throughout the year. If we are to be expected to improve our annual occupancy rates it will be necessary for other types of businesses to remain open year round in order to attract best throughout the year. For example, the Pleasure Beach and the Tower should open midweek as well as weekends in the winter months: the theatres and piers should be providing suitable entertainment throughout the year; investment should be made in all-weather family attractions instead of concentrating solely on conference trade. All of these measures would surely increase the viability of the existing businesses that are still currently trading as accommodation providers.	Noted
014	a	Sweet Afton, 111 Albert Road (South Town Centre)	B	I am extremely concerned about the proposals, and strongly object to any further watering down of the Holiday areas. I live and do my very best to trade in the Central Holiday Area.	Noted
014	b	Sweet Afton, 111 Albert Road (South Town Centre)	A	Unfortunately, my life is made amazingly hard by one non-holiday accommodation property just two doors away. For many months, I have lived on a knife edge expecting the worst from this inappropriate badly managed (if at all) property. Regularly disturbed through the night by anti-social behaviour, partying, people shouting to attract the attention of their associates and so much more. As my guests come down for breakfast I am on tender hooks waiting for the tales of how they have suffered through the night. I do my very best to calm guests down and change the subject away from the dire experiences.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
014	c	Sweet Afton, 111 Albert Road (South Town Centre)	A	As my guests leave I am seriously worried as to whether they will return. The consequences of this are that I become far more dependent on the On-line travel agents which seriously drain the town of desperately needed cash.	Noted
014	d	Sweet Afton, 111 Albert Road (South Town Centre)	A	On the opposite side of the road a few yards further down Albert Road, there is another property which causes me serious concerns. This time though the property is holiday accommodation, but of the very worst kind. I regularly have people knocking my door asking for a room. They have walked out of this	Noted

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				disgusting hovel, and lost a lot of money. Those that I do take in causes me real anxiety and fear they may have been in the room at the other place long enough to transport bed bugs across.	
014	e	Sweet Afton, 111 Albert Road (South Town Centre)	A	So, from my own very personal experiences, I can only say that rather than watering down the holiday areas, Blackpool Council must stand back and take a close look at what has happened through the principle of market forces and little management. What these areas need is strong management and real support for one of the things that makes Blackpool Britain's Favourite Seaside resort and there is no doubt what so ever that that is the small family run hotels and B&B's	The boundaries of the HAAs remain as originally approved in 2011.
014	f	Sweet Afton, 111 Albert Road (South Town Centre)	A	I really do hope that it is not too late to save the areas like the Central Holiday Area, my home. There is only one option for the council, and that is to take ownership and responsibility for these areas. Support those great businesses which remain, challenge and if necessary take enforcement action against the properties which are destroying the area. Take steps to make these areas look and feel special again.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
014	g	Sweet Afton, 111 Albert Road (South Town Centre)	C	The council must seriously enforce these items should this be accepted	Noted
015		Natural England	A	No comments	Noted
016	a	St Nicholas Holiday Apartments, Coronation Street	A	Having read the revised SPD. I am instantly drawn to point 1.4 (which states); "Blackpool is a holiday resort and the council continues to champion the tourism economy." Question: If this is indeed true then where is the 'Tourism Department' within Blackpool Council? (as far as I am aware, there isn't one!). If Blackpool Council are committed in the town remaining as the UK's No1 seaside destination then surely this department should be reinstated asap. Business owners within the tourism sector need a focal point whereby they can seek advice or guidance with all things, tourism related. Instead, we currently have an 'elected councillor' who holds the 'Tourism portfolio' and rightly or wrongly, many business owners see them carrying out their duties through a political prism (rather than being all encompassing, across the resort). This must change.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
016	b	St Nicholas Holiday Apartments, Coronation	A	The SPD document makes no attempt at recognising or dealing with the ever-increasing HMO's (in and out of the Holiday Zones) that are now being used for social housing. These could be referrals from prison services, probation services or indeed, local authorities themselves. Not only do local businesses have to	The SPD relates to the control of holiday accommodation in defined areas. The background report refers to the issue of HMO's.

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
		Street		deal with the ever-growing number of HMO's via the way of social housing, but BC have allowed Lancashire and Cumbria probation services (LCPS), to set up business on Coronation Street. Given the very nature of the business/service that LCPS offers, the surrounding area is now seeing a spike in various forms of ASB from some of their clients.	
016	c	St Nicholas Holiday Apartments, Coronation Street	B	2.2 of the SPD references policy CS23 of the Local Plan Part 1: Core Strategy (2016) 'managing holiday bed spaces'. This policy allows more hotels and guest houses to change to residential use within the holiday zones. Again, this policy is destroying the tourism sector by creating a mixed use which is often not compatible with each other (residential next to holiday accommodation).	Policy CS23 refers to the two separate locations, firstly within the defined HAAs, where controls are in place, and secondly, outside the HAAs where change of use can occur.
016	d	St Nicholas Holiday Apartments, Coronation Street	B	3.3 of the SPD document refers to an 'over supply of bed spaces' but yet BC wish to borrow millions of pounds in order to build a new hotel with 142 bedrooms. If this was not a case of double standards then the fact that the planned new build is 'outside' any designated holiday area! (see Main Holiday Area3 map within the SPD document).	The Humbert Study (2009) also referred to the predominance of small hotels and guest houses with just 16 businesses offering in excess of 100 bedrooms. The proposal for a new 143 bedroom hotel is about quality and type of hotel to ensure choice to the visitor.
016	e	St Nicholas Holiday Apartments, Coronation Street	B	4.1 states 'to provide a focussed supporting high-quality holiday accommodation offer in the defined areas off the promenade' Question: As some who works in the tourism sector (off the promenade), where is the support? What form does it come in? (The invest in the best scheme was scrapped as was the HOAST accreditation scheme).	This refers to the provision of high quality accommodation which is concentrated in the defined areas off the promenade to support the development of the resort of Blackpool.
016	f	St Nicholas Holiday Apartments, Coronation Street	C	6.14 / 6.15 refers to viability issues and the need to demonstrate that holiday accommodation is no longer an option. Given that the number of properties being purchased and left empty appears to be increasing, I do question how robust these checks are by BC. Many business owners fear that once a certain period of time has elapsed or a property has fallen into such a bad state of repair, then a planning application for apartments or change to residential usage is submitted. Now 6.16 of the SPD tries to cover the issue of neglect, but in reality, properties that fall so far into decay will not see future investment as holiday stock as it is not cost effective to do so. Therefore, what are BC doing to address this in the long term? Personally, I would like to see BC be more proactive in contacting the owner of these empty properties and asking the question (before it is too late).	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
016	g	St Nicholas	C	As with the response in 6.14 / 6.15. BC need to be proactive rather than	The comments made are outside the

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
		Holiday Apartments, Coronation Street		reactionary when recognising failing businesses or properties that are left vacant over a long period of time (often years).	scope of the consultation on the review of the SPD and the Council will consider these separately.
017	a	Tudor Rose Hotel, 87 Coronation Street	A	Living in Blackpool and having been in the hospitality industry for 23 years. I have never seen such a sad deterioration of the various holiday areas within the town.	Noted
017	b	Tudor Rose Hotel, 87 Coronation Street	A	If Blackpool Council are not changing the boundaries within the designated holiday areas, then they should be 'tightening' whatever regulations are needed to save what is left. They should not be making it easier to deregister or change from holiday to residential.	The revisions have provided greater clarity on the exceptional circumstances tests for changes of use in the HAAs. Businesses which are no longer viable can provide robust evidence to support their application for change of use using the viability assessment.
017	c	Tudor Rose Hotel, 87 Coronation Street	A	Along with rogue and often absentee landlords, Blackpool Council must take some responsibility for allowing various "agencies" to house problematic residents in and around the holiday zones. Unless this stops then these areas will ultimately fall further into decline. How are the council addressing this fundamental issue?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
017	d	Tudor Rose Hotel, 87 Coronation Street	B	The SPD references an oversupply of bed spaces but yet the council are planning to build a new hotel (opposite Bickerstaff House). Whenever the council are asked about this directly, then the phrase 'market forces' is used as a justification for the borrowing of monies and the new build. This money would be better spent tidying up the existing streets within the Holiday areas. This could be via the introduction of street furniture (similar to that on the promenade), modernising the pavements or even creating streets with a nostalgic theme (decorated with Victorian lamps, road surfaces). Wouldn't it be refreshing if the council approached business owners on specific streets, with a view to creating themed areas within the resort!	The Humbert Study (2009) also referred to the predominance of small hotels and guest houses with just 16 businesses offering in excess of 100 bedrooms. The proposal for a new 143 bedroom hotel is about quality and type of hotel and is not relevant to the global aim to reduce bed spaces.
017	e	Tudor Rose Hotel, 87 Coronation Street	B	The SPD set outs to "encourage a better balance of quality homes and holiday accommodation set against key transport routes". How is this possible when Blackpool Transport removed key bus services from Coronation Street (which serviced the likes of Albert Road, Charnley Road, Livingston Rd, Regent Road etc) and moved to Central Drive? What is to stop further routes disappearing	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				from key holiday areas?	
017	f	Tudor Rose Hotel, 87 Coronation Street	C	Throughout the various reports (documents), there appears to be a continual emphasis on viability issues. What is the council's strategy in order to encourage, support and maintain these areas? With so many properties being left vacant it is hard to see what the council's involvement actually is!	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
017	g	Tudor Rose Hotel, 87 Coronation Street	C	As much as I welcome some type of Viability Template. It does appear to be 'after the horse has bolted' and therefore a little late in offering some type of assistance or solutions. Surely Blackpool Council should be engaging with both property owners and existing businesses before there is a (foreseeable) problem.	The revisions have provided greater clarity on the exceptional circumstances tests for changes of use in the HAAs. Businesses which are no longer viable can provide robust evidence to support their application for change of use using the viability assessment.
018	a	The Arabella, 102 Albert Road (South Town Centre)	A	Objections there are many such as the way the future of Blackpool is heading many doors are closing and this will cost the council in the end as there are less people returning for longer length holidays so therefore the funds will get lower, and then there will be more cuts, maybe your jobs, this council has taken over the years the nostalgia out of Blackpool, opposite the Winter Gardens you are now going to put up another glass box the cinema, Wilkinson to be knocked down put up another glass box is this what Blackpool is becoming, has no one got any imagination anymore to make the outside of these buildings in context with the nostalgia that is needed.	Noted
018	b	The Arabella, 102 Albert Road (South Town Centre)	A	(1) Stop basing the figures on amusement entries, as most are one-day visitors anyway, we are the people you should be asking we know what is needed in the area, guests come and say to us nothing never changes the North pier is deteriorating, where are the deck chairs so we can sit on the sand, what do we keep say to our guests?	Noted
018	c	The Arabella, 102 Albert Road (South Town Centre)	A	(2) Guests complaining about the prices of getting into places, I had 2 guests went to Tower ball room had a dance and they fancied the nice afternoon tea advertised and enquired about the price was told it would cost them £90, it's a joke unless the person that told them was out to make money as well. Yet we went in the 2 weeks before and was quoted £60 it's still a joke.	Noted
018	d	The Arabella, 102 Albert Road (South Town Centre)	A	(3) With the lack of order within the holiday area what guests have to see us hoteliers and shop keepers have to deal with on a daily basis, the money seems to be going to the council's projects, but when hoteliers ask for a simple thing like alley gates to protect us from gangs of drug dealers it's a fight all the way, and	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				where are the police never come out when needed, we can wait days for their response.	
018	e	The Arabella, 102 Albert Road (South Town Centre)	A	(4) Main concern is putting HMOs within the holiday zone which doesn't work and never will work, holiday makers do not wish to see dirty drop outs begging, dealing drugs and needles on the streets, the amount of my guests tell me that they have been approached by these sort of lads trying to sell them Vodka, or Whisky and cigarettes while sitting on my premises and on the street, but I warn my guests over and over again not to buy or give money. Again, where is the undercover policing.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	f	The Arabella, 102 Albert Road (South Town Centre)	A	(5) The council as a whole could do far more for the holiday area by setting their own standard with a set of rules as to the properties that are leased or rented as a lot of hoteliers think that due to landlords that live many miles and some abroad out the area have not got a clue as to what is happening to their properties half the time, most agents have not got training skills they just come and start a business and as long as they are getting their commission they are not really bothered, and most then end up with drug dealers and prostitutes in them, so therefore the good tenants have to pay the price of living in hell, most are in need of a full refurbishment or repair or boarded up they are a disgrace and that landlords/landladies need to be made to have more responsibility on getting their act together you only have to look on Albert road, Charnley road, Vance road, and more in the holiday area.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	g	The Arabella, 102 Albert Road (South Town Centre)	A	(6) All tenants living in flats should be put on a 2-month rolling contract therefore it is easier to remove them without going to court and that would save money. That is what I did when I rented my property.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	h	The Arabella, 102 Albert Road (South Town Centre)	A	(7) The accreditation scheme has to be one of the best ways to show people what grade they are paying for, therefore a licence should be introduced before anyone can trade making sure everything is in place.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	i	The Arabella, 102 Albert Road (South Town Centre)	A	(8) One of the biggest issues at the moment that the hoteliers have is with booking.com were they have a star rated system even if the hotels are not up to liveable standard but just pass the grade like a hotel near me has a good star rating but says disappointing people come and many walk out and do not get a refund, I would say its fraud some were along the line, so I think the council should put forward to 'Visit England', 'Blackpool Approved', Stay Blackpool and Yes Hotels that that it should go back to Diamonds or something else other than	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				stars even though other countries may have the star system.	
018	j	The Arabella, 102 Albert Road (South Town Centre)	A	(9) Roads - the traffic is becoming a big problem in the centre of Blackpool especially speeding. Albert road is being used as race track because it is a cut through road, motor bikes, boy racers, even taxi drivers rushing round to beat each other to the Winter Gardens to pick up fares, when the lights are on green at the cross road of Coronation Street and Albert road the cars can speed up to 65mph or more we need at least 2 cameras installed even if they are only dummy ones with no film in would help.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	k	The Arabella, 102 Albert Road (South Town Centre)	A	(10) Bins more waste bins are needed on Albert road due to the amount of take aways in Blackpool at the weekends the people just throw it in the front gardens because there are no bins on the left side going up the road from Debenhams.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	l	The Arabella, 102 Albert Road (South Town Centre)	A	(11) A guest of mine made a comment to say that if trading standards get at least 12 complaints or even less from guests that are staying at a property, then there has to be something wrong so therefore should be investigated.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
018	m	The Arabella, 102 Albert Road (South Town Centre)	A	To sum up Blackpool we came here 13 years ago and in the last 5 years seen a very quick decline in the area to how the Council have not invested in the right areas, allowing organisations in the holiday area to trade for the homeless and food banks just so properties do not stand empty, this should be done on the outer of Blackpool away from holiday makers and children to see, this is the only way that people will come back to invest and work for a better future for Blackpool.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
019		Gleneagles Hotel, 75 Albert Road (South Town Centre)		The protected holiday areas (zone) should in our view stay protected for holiday accommodation only and should not include permanent /residential use (apartments/flats). We feel holiday and permanent/residential would not mix especially if the council/planning would have no control over who lives in the properties or their behaviour. Therefore, the town centre holiday accommodation areas must be protected for the future growth of the visitor industry in Blackpool.	The HASPD defines specific areas of holiday accommodation to which Policy CS23 of the Blackpool Local Plan Part 1: Core Strategy (2016) should apply. Some of the areas are more mixed use than others. The policy approach does not apply to uses which are not holiday accommodation.
020	a	The Address, 91-93 Reads Avenue (South Town Centre)	A	The revised SPD has been made with detailed research on a street by street basis. Unfortunately, not every resident on the street was contacted to give their views on the study conducted to prepare the SPD which should be the way.	The Council maintains a database of land use, accreditation, and enforcement cases. This data was used by the consultants to "review" the current HAAs and the HASPD.

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
					Informal consultation was carried out on the way in which the HASPD has worked over the past 5 years so as to compare the results on the ground with the views and perceptions of those living and working in the area. The formal consultation on the proposed revisions is required to which you are responding.
020	b	The Address, 91-93 Reads Avenue (South Town Centre)	A	I believe that even though my guest accommodation falls within the HAA I should be given the choice to continue and when unable to run the B&B to the required standards due to diminishing profits which make it commercially unviable to run to convert to semi residential when required.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
020	c	The Address, 91-93 Reads Avenue (South Town Centre)	A	The council should not pressurise residents who are doing things in the right manner and who have invested heavily in Blackpool and in their B&B's to continue as B&B's or sell in all cases at a much much lower price than the initial investment made.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
020	d	The Address, 91-93 Reads Avenue (South Town Centre)	A	Permission for change of use should be granted to residents within the HAA especially on streets of mixed use e.g. Reads Avenue, where there are B&B's residential accommodation, HMO's etc. Each planning application made from someone within the HAA for change of use should be considered on a case by case basis.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
020	e	The Address, 91-93 Reads Avenue (South Town Centre)	A	Where legitimate investment has been made and substantial amounts are spent each year to maintain the property the case for change of use should be considered especially when the owner/s are reaching an age when they are unable to continue trading in a viable manner.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
020	f	The Address, 91-93 Reads Avenue (South	C	Taking in guests who do not want to pay decent prices and conducting business in an above board manner makes the business sooner or later unviable to run.	Noted

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No.	Sub No.	Name	Type	Comments	Blackpool Council Response
		Town Centre)			
020	g	The Address, 91-93 Reads Avenue (South Town Centre)	C	Just running to pay the bills by direct debit and managing to pay for regular repairs and maintenance without taking any wages and having negligible profit at the end means that the business is not viable.	Noted
020	h	The Address, 91-93 Reads Avenue (South Town Centre)	C	All B&B owners who are unable to sell due to the very low prices being offered should be given the opportunity to reinvest in their properties in such a way as to make it financially viable. This is especially related to businesses who are trying their best to offer guests a great experience of Blackpool.	The revised exceptional circumstances allow for business which can prove a lack of viability to change to a compatible use.
020	i	The Address, 91-93 Reads Avenue (South Town Centre)	C	Good quality residential development within the HAA should be permitted without any unnecessary red tape.	The revised exceptional circumstances allow for business which can prove a lack of viability to change to a compatible use.
020	j	The Address, 91-93 Reads Avenue (South Town Centre)	A	The decision to make Reads Avenue one way has definitely affected business due to the bicycle path. Not beneficial to business on this side of Reads avenue.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
021	a	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	A	I strongly object to any further watering down of the Holiday areas, as I can only see the proposal is offering this scenario.	Noted. The SPD retains the Holiday Accommodation Areas and only allows changes of use where exceptional circumstances are demonstrated.
021	b	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	A	The principle of market forces has been exploited by the "bullies" who are only interested in themselves not the fantastic heritage of the area. I was driven out of my previous property by one such individual, and am now next door to one of the most obscene accommodation operators. One of the main reasons the staying visitors and business people do not come back.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
021	c	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	A	My neighbour trades at a level which is border line legal though far from descent as I regularly hear from those who have been misled into booking to stay by the on-line travel agent Booking.com. A company who's review scores suggest the place is half descent, and a sales pitch which drives the customer into booking asap. (Something which also needs seriously challenging)	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
021	d	K Twiss, The Lumada, 100 Albert Road (South Town	A	This property causes me and my partner so much stress, heartache and despair, with the inappropriate and antisocial activities. We share a drive way, and they use an open top skip for their rubbish which continuously ends up across my drive. My guests in the back rooms look directly on to a property in severely bad	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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		Centre)		repair, with window dressing which mean my guests have to close the curtains for any privacy. The place is badly managed and their guest regularly if not always disturb my guests. the list goes on and on and on. I also suffer distressing levels of abuse from the operator of the place, accusing me of all sorts, such as stealing his guests. I do spend a great deal of time helping the people who have walked out as the council have no instructions on how to complain about hotels. Though I do now have a document which does give advice which has been confirmed as appropriate by a member of Trading Standards.	
021	e	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	A	As well as badly run low quality accommodation, the amount of low quality badly managed HMO type flats are destroying every aspect of the staying visitor experience.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
021	f	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	A	What is being proposed will cause further destruction of the already fragile holiday areas and amounts to no more than a coalition of chaos.	The SPD retains the Holiday Accommodation Areas and only allows changes of use where exceptional circumstances are demonstrated.
021	g	K Twiss, The Lumada, 100 Albert Road (South Town Centre)		I passionately believe that rather than watering down the holiday areas, Blackpool Council must take back ownership of the holiday areas in partnership with the communities and strongly manage these areas and support the independent businesses that make Blackpool Britain's Favourite Seaside resort.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
021	h	K Twiss, The Lumada, 100 Albert Road (South Town Centre)		Big hotels may offer investment, but what they offer cannot compare with the unique relationship between the guest house owners (the real Blackpool Ambassadors) and the staying visitors. The other thing about the big hotels is that like the on-line travel agents they too drain money from the town as generated profit goes to support their shareholders and their company head offices none of which are located here.	Noted
021	i	K Twiss, The Lumada, 100 Albert Road (South Town Centre)	C	The council must rigorously enforce these criteria should this be accepted. In reality, there should be no more conversions. There should also be a clause that stops people converting just to sell. If they convert there must be a clause that they cannot move for 5 years or more	Noted. Planning can only deal with planning applications such as for changes of use. Planning cannot control ownership or place restrictions on who can own a property.
022	a	Stay Blackpool	A	Please accept this as the StayBlackpool, (formerly the Blackpool Hotel & Guesthouse Association), members' submission with regard to the above	Noted

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				consultation. We are pleased to note that you are not making any changes to the Holiday Accommodation Area boundaries in that they are not to be further reduced and we do not disagree with the facts as stated within the paper. The aims and ambitions of the key changes are in fact admirable and aspirational, however, the association has to object to the proposals because we feel the council will be unable to manage and enforce as strongly as will be required.	
022	b	Stay Blackpool	A	StayBlackpool believes a more flexible policy framework than previously set out in the 2006 Local Plan will have a negative impact and further increase the town's accommodation problems and issues. What is being proposed is little different to the current situation and the controls already in place are not sufficient to have any real positive impact. There is a general consensus that at present the council is reactive to problems after they already exist and the proposal will not help to improve or redress this situation.	Noted
022	c	Stay Blackpool	A	The policy states one of the key aims is "to support an improvement in quality and reduction in the amount of holiday accommodation, which consolidates provision in the most sustainable locations." Although the paper states the need to reduce the town's bedstock, controversially and against the council's own written strategies and plans they themselves are able to ignore this and borrow millions to develop new hotels adding hundreds more rooms to the existing problems. This is of great concern to the many Blackpool hoteliers who work tirelessly to provide exceptional accommodation and good customer practice yet feel unsupported and in fact let down. There is a general feeling therefore that these so called "controls" can be manipulated to suit the council's own agenda.	The Humbert Study (2009) also referred to the predominance of small hotels and guest houses with just 16 businesses offering in excess of 100 bedrooms. The proposal for a new 143 bedroom hotel is about quality and type of hotel and is not relevant to the global aim to reduce bed spaces.
022	d	Stay Blackpool	A	Another key aim is "to maintain the promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation." This aim is simply unattainable without significant changes to processes and protocols. A prime example is the Ibis Styles Hotel which is located in a prime seafront position, is a listed building, yet is allowed to fall into dis-repair. The issue had to be brought to the attention of the council by Blackpool's own Civic Trust, discussions were held and many months later no improvement has been made. The property is seen by millions and is an eyesore.	Noted
022	E	Stay Blackpool	A	Blackpool's enforcement team do an incredible job in spite of the resource and financial restraints they have to work within and the proposed policy, we feel, will just put them under more pressure. They are currently fighting a rear-guard action and without the possibility of more resources this situation will not change.	Noted
022	f	Stay Blackpool	A	215 Orders are a reaction to a problem and the request for "change of use in	Noted. The evidence shows only 5

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				exceptional circumstances,” is rarely going to be for a good reason and in the majority of cases the application will be brought as a result of bad management and lack of finance. Many of these properties will, without doubt, turn into HMO’s which will require to be refinanced and managed properly to have a good outcome and it was probably the lack of finance and good management that brought the property to this juncture.	successful applications for change of use in the HAAs between 2011 and 2016. In each case exceptional circumstances were agreed. Viability has been recognised as a major issue and the introduction of the revised viability assessment will help those who are currently unable to change use where the business is no longer viable. Not all viability arguments are as a result of bad management and lack of finance.
022	G	Stay Blackpool	A	This is exacerbated by the lengthy and prolonged periods of time taken for any legal process or court action to conclude. In one known instance, it took 8 years for a problem property to be closed by which time the damage had already been done. The surrounding good businesses had suffered years of anti-social behavior from their neighbour’s tenants, the property had deteriorated to a state of near dereliction, there were uncontrollable rubbish issues, the list of problems were endless. There was also the cost involved in regular policing, enforcement team time, etc. etc. This obviously led to a decline in the street’s visitor numbers, a decline in incomes and threatened a number of livelihoods.	The Council accepts that enforcement cases can take a long time to resolve.
022	h	Stay Blackpool	A	There is nothing currently or in the proposals put forward that will ensure the surrounding businesses of a problem property are any more protected against these regular occurrences and issues. It was understood or the perception was that the holiday accommodation areas would be managed/controlled/protected as holiday accommodation areas. Yet it is the case that these areas are just as blighted with vacant properties, HMO’s, Probation Service Offices, prostitutes, anti-social behavior, fly tipping, rubbish dumping etc. so in reality not managed/controlled/protected at all.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
022	i	Stay Blackpool	A	The new conference facility is a hugely welcome development seen as an opportunity to bring new visitors to the town and to “show off” our stunning Winter Gardens. However, possibly our largest and most affluent market is that of the dance world and the fact the town hosts the most celebrated and prestigious dance competitions is of huge financial benefit. These are global events bringing in international visitors to the resort that stay and spend and are essential to the town’s economy. The attendees are already critical of the state of the	Noted

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				surrounding area of the facility and of the beggars, prostitutes and drug dealers that approach and often intimidate them whilst walking between the venue and the car parks. The local accommodation providers fear this will continue and be the “welcome” received by the new conference attendees. They hope this will not jeopardise future conference bookings and put the success of the development at risk.	
022	j	Stay Blackpool	A	There is a need to support quality hoteliers and to “encourage” those unscrupulous accommodation providers to improve. There has been much work undertaken over the years with regard to a “License to Trade Scheme” but an actual “scheme” was never created. The premise was to bring about change for the enforcement team whereby instead of being reactive they had the facility to be proactive. Instead of them becoming involved after a situation had developed this system would be compulsory and mean every hotelier required a license before they could trade. We now have the Blackpool Approved Scheme which could facilitate such a License.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
022	k	Stay Blackpool	A	The belief is that as the Selective License scheme has impacted successfully on the HMO situation this License to Trade scheme has the potential to have the same positive impact on the quality of accommodation offered in the town and reduce the large numbers of poor providers who give Blackpool a bad name and consequently reduce the tariffs achievable by all. This would not only improve the accommodation offer, it would bring rates in line with the rest of the country, allow for much needed future property/product investment and create a thriving and confident environment.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
022	l	Stay Blackpool	A	There is also a need for the planners to support and encourage development. There have been instances where the development of derelict hotels has been delayed by years as the parties involved cannot agree. There needs to be better communication, negotiation and support from the planners to encourage developers to the town. Blackpool has to be seen as a town with a huge opportunity to do business with a forward thinking and visionary planning team who help, support, encourage and indeed delight in easing the process therefore attracting investment and creating an environment for growth and regeneration to support the long term future of the resort.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
022	m	Stay Blackpool	A	To conclude, the proposals put forward make a good case for change in theory but our members are convinced that allowing any change of use from holiday accommodation to residential even under exceptional circumstances, in the main holiday areas, will have a further detrimental effect in these locations of the town	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				as history has proved that theory and reality are two very different experiences. Without the backup and support of increased powers, controls and resources more bad situations will be created. The council needs to be bold, rigorous, decisive and work with the communities, neighborhoods and associations to create high quality and high standards of design to deliver any regeneration benefits.	
023		Environment Agency		No comments	Noted
024	a	P Hyatt, 32 Clifton Drive	A	The holiday accommodation problem is one of many issues facing Blackpool and I hope the Council considers the whole picture when deciding if a change in policy is required. To save time in my comments, I've referred to the 'Blackpool Holiday Accommodation SPD review 2016/17, Stage 1 Report' as the 'Stage 1 report'.	Noted
024	b	P Hyatt, 32 Clifton Drive	B	In my view, the figures presented do not, in themselves, support the case for change in policy. For example, the case is not made for removing the 'fixed quantum' requirement for the Promenade. I do not support the proposal in its current form.	The 'fixed quantum' refers specifically to changes of use on the Promenade within the HAAs (red and orange areas) which represent approximately half of the Promenade premises. The current wording is considered to be too restrictive, not allowing mixed use schemes which can include holiday accommodation and other uses.
024	c	P Hyatt, 32 Clifton Drive	A	In 2008 the Humbert study said that the number of bed spaces needed to be reduced by 15,024 (Scenario 1). A Council study in 2016 showed that 11,315 bed spaces had gone. An average reduction of over 1,400 bed spaces per year. The Humbert study target will be met in the next year or two without any change in Council Policy. So, I don't think bed-space reduction is the main issue.	The oversupply of bed spaces was recognised in 2009 in the Humberts study. Scenario 1 stated a minimum reduction of 15,024 bed spaces to attain national average occupancy levels. Scenario 2 - 23,636 bed spaces (660 premises), Scenario 3 - 27,354 bed spaces (761 premises). Current total in 2016 estimated at 49,400 bed spaces, reduction of 11,315 since 2008 approx. 75% of the required reduction under scenario 1.
024	d	P Hyatt, 32 Clifton Drive	A	The real problem seems to be that many of these bed spaces are lost from guest houses and hotels which close and then remain empty - which embarrasses the	The comments made are outside the scope of the consultation on the review

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				council, annoys the neighbours, attracts vandals etc. Some people claim that empty property affects other businesses but I've never seen proof of a well-maintained empty building putting off customers. The problem seems to occur where owners: leave the building to deteriorate, board up windows, allow weeds to overgrow forecourts etc. That really can affect a neighbourhood and it's a disgrace that it's allowed to happen. This puts pressure on the Council to find a quick-fix which is not necessarily in the best long-term interests of the town or its residents. I sometimes wonder if this is done deliberately by property owners? Does the Council not have powers to force owners to maintain the exterior appearance of buildings? This would at least allow Council officials to step back and consider the issue of bed spaces in a more considered way.	of the SPD and the Council will consider these separately.
024	e	P Hyatt, 32 Clifton Drive	A	The Council needs to consider the wider consequences of any change in policy. The Stage 1 report doesn't answer the following questions: Firstly, who will pay for the conversion of empty guest houses & hotels? Presumably most will have closed because of financial problems (someone mentioned the high cost of electrical work as being a factor in closure). If owners genuinely couldn't afford to maintain the property, then how will they be able to pay for the high standard of conversion that the Council quite rightly demands? Is there a danger that some guest house/hotel owners will stop routine maintenance to save money and then claim that the property has deteriorated to a point where it's no longer viable to carry out repairs? I also recall reading that Banks are reluctant to lend to guest house and hotel owners - so there's no guarantee of a loan from that source. Who will fund the conversion costs?	Property owners will need to meet the costs of conversion. No grants are available.
024	f	P Hyatt, 32 Clifton Drive	A	The Government White Paper ' Fixing Our Broken Housing Market' which was presented to Parliament in February 2017 (Cm 9352) looked at new developments rather than conversions but a couple of issues may apply here. Firstly, it suggests that a full plan - including financing - should be in place before planning applications are considered - this helps avoid speculative outline planning applications where there is no real prospect of the development taking place but owners want to inflate the price of the property before it is put up for sale. The White Paper also suggested reducing the length of time that planning permission is valid for from 3 years to 2 years - to help reduce the blight that can affect local areas when planning permission is granted but development does not take place. The General Election delayed the progress of the White paper but maybe the Council could consider introducing something similar to avoid	Noted

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				property speculation and ensure that change of use is granted in genuine cases only?	
024	g	P Hyatt, 32 Clifton Drive	A	<p>Next, who is going to live in these converted flats and houses? Historically, supply has outstripped demand in the Blackpool housing market. In the 'Blackpool Market Signals Report (May 2015)' the Council's Head of Housing examined housing demand between Census years 2001 - 2011 and stated: "Levels of net migration and household formation within the area appear not to have been constrained by any lack of housing supply within the area." He noted that "2,315 additional housing units being created (232 p.a.) the number of households only increased at the average rate of 43 p.a." He concludes with; "The longer-term history has been of Blackpool lagging behind other areas economically and of very limited population and household growth despite the delivery of additional housing units."</p> <p>With a rising unemployment rate in Blackpool (up from 6 per cent to 6.6 per cent according to Blackpool Gazette, 17 March 2017) in contrast to the national trend, there's little incentive for the economically active to move to Blackpool.</p>	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
024	h	P Hyatt, 32 Clifton Drive	B	In the same Gazette article, Paul Maynard, MP, is quoted as saying: "the council has questions to answer on how it looks at job creation and supporting business". It seems to be a key point. So, I do find it odd that the change in Council policy could accelerate job losses in the hotel industry. I appreciate that the point is made in the Stage 1 report that guest houses once closed rarely re-open - so those jobs have already gone - but surely promenade hotels should be preserved and change of use should not be allowed along the whole of the holiday area seafront which is probably the most sought-after destination by overnight visitors? There's a danger the Council will throw out the baby with the bathwater if no distinction is made between the guest houses in unpopular backstreets and hotels in desirable locations. The 'fixed quantum' should be retained on the Promenade but possibly not elsewhere.	The HASPD does make a distinction between those holiday accommodation areas on the Promenade and those off the Promenade. The 'fixed quantum' refers specifically to changes of use on the Promenade within the HAAs (red and orange areas) which represent approximately half of the Promenade premises. The current wording is considered to be too restrictive, not allowing mixed use schemes which can include holiday accommodation and other uses.
024	i	P Hyatt, 32 Clifton Drive	A	Unemployment could get worse if civil service jobs are lost at Tomlinson House as planned over the next few years. A quick check of the main estate agent portal showed 2,109 properties for sale in Blackpool on 22 July 2017. Will the proposed change in policy result in empty guest houses and hotels being converted in to empty flats and houses, and so creating a different set of problems for Blackpool's property market?	The minor changes in policy include revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face. The planning policy cannot control the

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					occupancy of the resulting conversions.
024	j	P Hyatt, 32 Clifton Drive	A	Other points: I couldn't see anything about the possible effects the policy change might have on population density. The Blackpool Local Plan referred to National guidelines which recommend of between 30 - 50 dwellings per hectare for new developments. Will the change in policy affect densities in the town?	The supporting text to Core Strategy policy CS13 states higher densities are sought in more accessible locations, where the site is within walking distance of town, district or local centres or well-served by public transport. Location, design and site configuration issues will need to be balanced with density considerations, particularly on small sites, in order to achieve the best possible development.
024	k	P Hyatt, 32 Clifton Drive	A	I couldn't see any consideration or estimate of the impact on bed spaces of the new conference centre, even though Council Leader, Simon Blackburn, is reported as saying that 'the town needed more hotels to meet the future demand for overnight stays due to investments including in a new conference centre' (Blackpool Gazette 31 March 2017). It appears that plans for a couple of the planned new hotels have fallen by the wayside so why is the Council not looking actively at supporting existing hotels in preparation for the future conference business?	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
024	l	P Hyatt, 32 Clifton Drive	A	The reinstatement of a direct rail link into Blackpool should boost tourism further.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
024	m	P Hyatt, 32 Clifton Drive	A	Did the Humbert study contain a 'scenario' that considered a significant rise in overnight stays? Scenario 1 assumes "a small increase in staying visitors due to resort regeneration" (para 1.3 in the Stage 1 report) and I think scenario 2 was negative. Do the assumptions made in Scenario 1 actually match recent trends in staying visitors? I couldn't find any breakdown of the trends in overnight stays in the Stage 1 report but press reports indicate a marked increase in overnight stays in 2017: "Analysis by online booking specialist eviivo shows advanced bookings for Blackpool b&b's is up by more than 14 per cent compared to the same time last year" (Blackpool Gazette, 3 June 2017). Has this recent upturn	The oversupply of bed spaces was recognised in 2009 in the Humberts study. Scenario 1 stated a minimum reduction of 15,024 bed spaces to attain national average occupancy levels. Scenario 2 - 23,636 bed spaces (660 premises), Scenario 3 - 27,354 bed spaces (761 premises). Current total in 2016 estimated at

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				been factored in to Council projections of staying visitor numbers and bed spaces?	49,400 bed spaces, represents a reduction of 11,315 since 2008 approx. 75% of the required reduction under scenario 1. There remains a large oversupply of bed spaces, despite fluctuations in visitor numbers.
024	n	P Hyatt, 32 Clifton Drive		Car parking is touched on in the Stage 1 report but there is no detailed assessment of the effect that converting guest houses & hotels to flats and houses will have on parking in local streets. I believe government guidance is to provide an average of 1.5 parking spaces per household space. Can this be achieved for converted properties? If not, will the lack of parking spaces deter potential buyers? And will the creation of flats and houses increase parking problems for existing residents and those guest houses and hotels that continue to trade?	Change of use within HAAs will be permitted if a strict viability test is met and the proposed use is compatible. High quality residential uses which meet the standards set out in the Council's adopted New Homes from Old Places SPD may be appropriate. This SPD deals specifically with the conversion of holiday accommodation to high quality residential use. Parking is a material consideration when dealing with a planning application.
024	o	P Hyatt, 32 Clifton Drive	C	Draft Full Viability Evidence Form (Appendix 4). The criteria for assessing the viability of guest houses and hotels will need careful consideration and the draft form needs further development. The Council certainly needs to avoid a situation where guest houses and hotels are deliberately run down so that owners can claim they are no longer viable because of poor trading or the cost of repairs.	Noted
024	p	P Hyatt, 32 Clifton Drive	C	I think Section 1 should ask the number of bedrooms and maybe floorspace to give context to the other details (I know bed spaces is listed in section 2 but you need to check that all bedrooms are being used and if any rooms are not used). It also needs to ask more about the investment in refurbishment & maintenance over the past 10 years and how this was financed. Otherwise there may be a situation where a couple of events - such as insurance claims - could distort the figures and wrongly create the impression that the owner has invested sensibly in developing the business rather than just benefiting from unexpected incidents.	The viability assessment will support the planning application which will need to provide full details of the property including number of bedrooms and floorspace.
024	q	P Hyatt, 32 Clifton Drive	C	Do you need to ask directly how long the owner has owned and/or managed the property? And how many years has the property be a guest house/hotel in total? The 'trading in its current form' question is ambiguous and might not identify property speculators who sit on a property for a year or two and then apply for change of use.	The details requested in the viability assessment will support the planning application.

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024	r	P Hyatt, 32 Clifton Drive	C	Would it be useful to know the age of the applicant? Would the Council look more favourably on an application from retired guest house owners who wanted to convert the property in to their own retirement house? Has the Council's own 'Housing plan for the ageing population 2017- 2020' been taken in to account?	The age of an applicant is not a requirement on the planning application forms. Where a case is being made for a retired or retiring owner to use the premises for their own use, this information will normally be contained in the application as part of the case being made.
024	s	P Hyatt, 32 Clifton Drive	C	Section 2 - Trading information. What happens if the guest house/hotel has ceased trading for some time? Does it need a question on average and maximum room rates? Unrealistic room rates will lead to low occupancy rates - it would be easy for a hotelier to show current marketing activity with no positive results without revealing that room rates were pitched at a level which would deter visitors (I have actually seen £999 room per night on hotel booking sites). How will the council verify this information?	The viability assessment requests a range of information including trading information, marketing evidence and financial accounts. This will be used to support the planning application.
024	t	P Hyatt, 32 Clifton Drive	C	Section 3. Financial information. I think owners should provide longer term evidence of profit or loss otherwise temporary rises or falls in profit/loss could distort the results and long-term results could present a different picture.	The Council is requesting 3 years as a reasonable period.
024	u	P Hyatt, 32 Clifton Drive	C	I do agree that while taking past performance into consideration, the Council should give far more weight to future trading viability and assume an "average competent operator" (I think this comes from the Torbay study). It would be relatively easy for a determined owner to run a hotel at a loss for a period to distort the profit/loss figures or for an incompetent owner to trade at a loss inadvertently. I think it's also been suggested that the performance of similar hotels nearby should be included in the viability assessment. This must be a good idea as it would provide a benchmark for the trading conditions of similar properties in the location and the owner would need to explain the reasons if they appear to be trading out of line with other similar hotels.	Noted
024	v	P Hyatt, 32 Clifton Drive	C	I do agree that asking for clear evidence of recent attempts to sell the property is essential along with proof that the asking price is realistic for current market conditions (and the current condition of the property if it has been allowed to deteriorate). And the Council should take into consideration the success or failure of recent sales of other guest houses/hotels in the area. Presumably the decision to grant permission will depend on the degree to which the guest house/hotel has been realistically marketed before applying for permission to convert?	Noted. Any decision to grant planning permission for change of use will take into account evidence of marketing.

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024	w	P Hyatt, 32 Clifton Drive	A	<p>Community Consultation: The Government White Paper ' Fixing Our Broken Housing Market' which (Cm 9352) mentioned previously, says the following: 1.44 We want to ensure that communities can influence the design of what gets built in their area. Local people want new developments to reflect their views about how their communities should evolve...Good design is also fundamental to creating healthy and attractive places where people genuinely want to live, and which can cater for all members of the community, young or old. And 1.46 To improve the approach to design, the Government proposes to amend the National Planning Policy Framework to:</p> <ul style="list-style-type: none"> <li>• expect that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) should set out clear design expectations following consultation with local communities.</li> <li>• strengthen the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided.</li> </ul> <p>I hope there is further community consultation on the proposals in line with the White Paper guidance.</p>	Noted. In terms of design the Council already has in place standards as set out in the Council's adopted New Homes from Old Places SPD. This deals specifically with the conversion of holiday accommodation to high quality residential use.
025	a	Central Blackpool Business Forum (CBBF)	A	<p>The CBBF (Central Blackpool Business Forum) is a significant business community group based in the Central Holiday Area. The group represents over 180 businesses mainly within the CHA. Although so much of the facts within this document cannot be argued with, the way forward is extremely weak and can only result in further decline. There are catastrophic levels of negative impacts currently destroying Blackpool's proud heritage, particularly in the Central Holiday Area. We cannot see that this document appreciates the severity of the issues, and as such, we object to the proposal which we see as a watering down of the Holiday Areas which will only generate more issues. Clearly what is needed is strong and stable leadership which works for the many and not the few. To achieve this, the council must make bold decisions now and enhance the relationships with the communities of the holiday areas.</p>	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	b	Central Blackpool Business Forum (CBBF)	A	<p>The Issues of Holiday Areas: (i) The state of many buildings within the area: Council needs to act faster to issue 215 orders. Giving advice and support at the early stages of the process. This must be rigorously managed and should enforcement be needed then this must be seen through completely. We have recently seen with the partial collapse of the Lowery Cafe Coronation Street, Adelaide Street junction, this is proof that rendering can hide a lot, had the owner been advised to maintain the building above the cafe to a decent level earlier,</p>	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				then just may be the under lying problem could have been spotted before lying in the street	
025	c	Central Blackpool Business Forum (CBBF)	A	(ii) Vacant properties: Blackpool Council should work harder in ensuring that vacant properties are brought back into commercial use. This could easily be achieved by offering grants, loans, or business rate relief where necessary.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	d	Central Blackpool Business Forum (CBBF)	A	(iii) HMO's: the decision to introduce the licensing for HMO's is a positive step. However, we feel that HMO's have no place within a dedicated holiday area (period). A mixture of residential and holiday accommodation has proved unsuccessful.	Evidence has shown just 5 changes of use in the HAAs between 2011 and 2016. The purpose of the HASPD and the defined areas, the HAAs is to restrict change of use away from holiday accommodation.
025	e	Central Blackpool Business Forum (CBBF)	A	(iv) The idea of benefits by the sea has been used inappropriately by companies to fill substandard rental properties. Tenants very quickly become disillusioned by the properties and either becomes a negative impact on the area or leave, and the landlords or their agents replace them with less than appropriate tenants. The impact is both severely negative on the area but also an extreme drain of the resources of police, emergency services and council support and enforcement teams	Noted
025	f	Central Blackpool Business Forum (CBBF)	A	(vi) The accommodation stock needs to be far better supported by Blackpool Council rather than borrowing vast amounts of money for 4 or 5 star hotels (new builds).	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	g	Central Blackpool Business Forum (CBBF)	A	(ix) A concerted effort to improve the visual impact of the area is desperately needed in order to make the area visually more appealing. This can be achieved by adding street furniture, extended illuminations beyond the promenade (this has been successfully implemented on Coronation Street and Charnley Road). It is also worth noting that these two schemes were community based and match funded by BC.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	h	Central Blackpool Business Forum (CBBF)	A	(x) Alley Gates: Where alleys have no gates, antisocial behaviour ranges from being mild to extreme. The need is desperate to get these alleys gated and the alleys to have public space protection orders in place. It must be remembered that the enormous number of decent smaller accommodation providers are dedicated Blackpool Ambassadors. The owners of these properties, as well as making visitors/guests extremely welcome also promote the events in the resort.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.

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				These individuals are the back bone of the visitor experience, bringing visitors back time and again. Though this group of people do not go out to seek recognition, they certainly deserve real support. Some of the towns accommodation providers are trapped with property they can only give away at bargain basement prices, or pile money into property knowing that it has no impact on the value of the property and as such they are wasting money.	
025	i	Central Blackpool Business Forum (CBBF)	A	The Way Forward: As stated a significantly different way of doing things is so desperately needed, and the plan being consulted on, lacks any substance. Our idea would be each of the main holiday areas being identified with their own 20mph zones with signs showing the named holiday area. The signage welcoming people coming into Blackpool, could include colour coded signs showing each area. These signs could then direct people off the main routes more appropriately. Reducing the risk of visitors getting lost and arriving in a less than positive state of mind. The Central Holiday Area has been fragmented allowing negative issues to be embedded in the area, which has, and continues to cause real significant issues. Hornby Rd is a clear example of this, where one side of the road is in the holiday area and the other side is out. How can this make sense to anyone?	The HAAs are defined areas where planning controls are in place. One of these is South Town Centre. This is aimed at those concentrations of holiday accommodation. The 'Central Holiday Area' to which you refer has not changed and is not the subject of the HASPD.
025	j	Central Blackpool Business Forum (CBBF)	A	(i) The right to hold landlords to account, in a constructive way and hopefully reducing the need for enforcement.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	k	Central Blackpool Business Forum (CBBF)	A	(ii) The right to hold property owners to account, again in a constructive way so we no longer see vacant properties deteriorate before our eyes. Having robust enforcement using 215 orders at hand is essential, to resolve the years of neglect and decay. Respecting owners' rights but ensuring the general improvement of the area	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	l	Central Blackpool Business Forum (CBBF)	A	(iii) The town's heritage as Britain's favourite seaside resort is seriously at stake. Bold decisions need taking now, to stem all the negativity. Creating an environment where businesses have the confidence to invest and people will want to come and stay in significant numbers once more, and residents can live and bring up families safe in the knowledge that the following applies and is enforced: - "Under Article eight and Article one of the first protocol to the Convention on Human Rights, a person is entitled to the right to respect for private and family life, and the peaceful enjoyment of his/her property"	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	m	Central	A	The Near Future: As the town moves forward looking towards the eventual	Noted

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
		Blackpool Business Forum (CBBF)		development of the central car park, plans need to start now, consulting with the communities most likely to be affected. Dependant on projects being considered there is likely to be a demand for extra car parking provision. One area which would immediately be an easy target would be the area to the west of Coronation Street. However, this is a stronghold for guest houses, B&B's and small hotels. The area directly to the East of Coronation Street has suffered extreme inroads by the HMO type accommodation. This must be reversed as soon as possible; as this could easily become the front line of the accommodation sector should the west be required for car parking. Steps must also be taken to protect the area from property speculators just interested in a fast buck, buying property and sitting on it without bringing any value to the area.	
025	n	Central Blackpool Business Forum (CBBF)	A	We feel, as a business forum, that a dedicated tourist department is needed, headed by someone who is willing to work with the local businesses. The present portfolio holders for tourism and small business have never engaged with this Forum, this we feel is unelectable, and should not be allowed to continue.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	o	Central Blackpool Business Forum (CBBF)	A	Additional Members Comments: "I have a hotel in Coronation street I would strongly like to see no further use of closed business being used for residential purposes we have already seen what this has done to the holiday area where all we see is drug and alcohol abuse from the tenants and holidaymakers are seeing this on a daily basis because of the residential being mixed in with hotels and B&B s it is doing this resort no good whatsoever as the guests are dwindling and rightly so if you came here for a holiday with children and found your hotel next to a HMO which is what is happening keep Blackpool a tourist area and build it back up to what it should be" I am concerned about the impact of what is happening in Blackpool, particularly in our central holiday area.	The review of the HASPD includes necessary revision to the exceptional circumstances for change of use within HAAs which give appropriate weight and recognition to the viability issues which many business owners face.
025	p	Central Blackpool Business Forum (CBBF)	A	Additional Members Comments: Anti-social behaviour is as a major concern for us, we are running a business & bringing up a young family in Blackpool, but no longer feel safe in our town. We want the holiday area to be a holiday area & not residential, we are very concerned about more buildings being turned into HMO on our streets in among our guests, which is going to impact massively on them coming on holiday, it is getting harder & harder to defend Blackpool to visitors when they can see what is going on in area for themselves. So many properties in our area in a bad state of repair, this also really needs addressing.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
025	q	Central	A	Additional Members Comments:	Noted. There remains an oversupply of

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
		Blackpool Business Forum (CBBF)		My thoughts regarding the Holiday Area Consultation based on our location just to the South of Town Centre. Clearly Blackpool has too many bed spaces... a quick search of trip advisor shows:- Blackpool Bed & Breakfasts total properties 858; Bournemouth Bed & Breakfasts total properties 137 Brighton Bed and Breakfasts total properties 93 Scarborough Bed and Breakfasts total properties 183. This probably explains why we have the cheapest room rates in the UK.... too many providers chasing too few visitors.... a search on Booking.Com for a single night stay for one guest on the 20th July brings up a hotel offering a room for £14 a night and he is paying Booking.com fees out of that as well.!!	bed spaces and holiday accommodation premises in Blackpool. The current Policy CS23 of the Local Plan Part 1: Core Strategy (2016) 'Managing Holiday Bed Spaces' seeks to achieve an economically viable level of quality holiday accommodation in the resort. This current review of the HASPD aims to support an improvement in quality and reduction in the amount of holiday accommodation, which consolidates provision in the most sustainable locations.
025	r	Central Blackpool Business Forum (CBBF)	A	Additional Members Comments: You want to protect the Holiday Zones however what plans do you have to support the properties within the zones.... recently two of the adjoining properties to ours (The Astoria and The Malibu) were bought by a subsidiary of the council, during a visit to introduce himself and the plans for the properties a representative of the company asked us if we might be interested in selling and made us an off the cuff offer of £75,000. Thirteen years ago we paid £250,000. Sadly, we and many of our fellow accommodation providers in Blackpool now own businesses that we cannot sell for anything other than give away prices. The council need to ensure standards are maintained. You have tried promoting accreditation, however after years of being first a Host member and then a three-star rated accommodation provider with Visit England, we have this year dropped out of the scheme as have several of our fellow hoteliers. Nothing has changed bookings have not gone down. The star scheme seems to mean nothing to the guests who stay with us. You need to take on the responsibility of ensuring those standards are met if you want the holiday zone to prosper and here's why. At some point we will have to sell, I suspect ill health will force us out and the buyers will probably be one of the opportunists who are starting to buy bargain basement priced hotels/guesthouse's and selling accommodation at low low prices, and low low standards. We saw it first hand with the Malibu next door to, its history is well documented. We now have another property on Albert Road following that trend... This could prove to be the biggest threat to the holiday	It is important to understand that the HASPD does not set out 'Holiday Zones' but Holiday Accommodation Areas (HAAs). Within HAAs change of use from holiday accommodation use to other uses is controlled. Outside of the HAAs the Council will make a decision on new applications for holiday accommodation on their merits having regard to the NPPF and the adopted Core Strategy Local Plan.

No.	Sub No.	Name	Type	Comments	Blackpool Council Response
				zone properties that are bought cheap, bled dry for maximum profit with minimum investment.... then you will end up with streets of slums.!!!	
025	s	Central Blackpool Business Forum (CBBF)	A	Additional Members Comments: I would like to see stricter planning and a "No change of use policy" to properties that are adding to the overwhelming number of HMO's in this area. Also, the Probation Office that was allowed to open on Coronation Street is totally not in keeping with the Holiday area, it should never have been allowed in the first place, many of my customers find it offensive and intimidating by the undesirables using the probation Office who constantly pester my customers for money or cigarettes! In my opinion, this Probation Office needs to be closed down and relocated away from the Holiday Zone. I would like to see a zero tolerance on begging, drug dealings, prostitution and the consumption of alcohol on the streets of the Holiday Area, so that the tourists can feel safe again walking around the Holiday Area. Unfortunately, a lot of holiday makers who come into my Cafe say they will not be coming back to Blackpool because of the decline of this area with the run-down shop frontages and Hotels that have been left to decay into a very sorry state and the constant intimidation from beggars and drug addicts that frequent this part of Blackpool.	Evidence has shown just 5 changes of use in the HAAs between 2011 and 2016. Restrictions are in place in the defined areas (the HAAs). However, it is important to note that Coronation Street is a mixed use street and was not included in any HAA in 2011.
025	t	Central Blackpool Business Forum (CBBF)	A	Additional Members Comments: The main question of whether we have an interested Tourism portfolio holder and department is interesting. You must have seen the bloke coming around the hotels introducing himself as the Merlin customer services point of contact, Well his card had no name and the only point of contact was an email address, How faceless as what about immediate response by telephone as emails can go unanswered. I said to him the Tower used to engage with locals then got rid of the 100 club and now their numbers are down it is the only reason for getting us on board again. The main point is, I asked him as the Merlin Customer service point of contact who was in charge of Blackpool tourism and he couldn't give me an answer! So, our main portfolio has not made much of an impact to Merlin management.	The comments made are outside the scope of the consultation on the review of the SPD and the Council will consider these separately.
026		I Bagot	B	I fully support the changes. The new vision can only be good for the town and residents/businesses. A well thought out proposal that can benefit everyone.	Noted
026		I Bagot	C	No comment	Noted

Type: A = General Comments; B = comments on Q1; C = Comments on Q2



## Appendix4c: Viability Template

Applicants will be expected to produce the following information as part of a planning application for change of use from holiday accommodation to residential use within the defined Holiday Accommodation Areas. It is recommended that the viability evidence statement should be produced by a suitably qualified person who is able to provide an objective and informed assessment.

### 1) General Information

Name of and address of Applicant including telephone and email
Name and address of property subject to this viability test
What is the nature of your controlling interest in the property, the land it sits on and any adjacent land or properties?
How long has the establishment been trading in its current or most recent form? Please provide dates.
Age and condition of the building
Approximate investment on refurbishment and maintenance to the property totalled for each year over the last 10 years

**2) Trading Information**

Number of trading weeks per year over the last 3 years
Total number of available bed spaces per year over the last 3 years
Total number of sleepers per year over the last 3 years
Please supply evidence of your marketing activity over the last 12 months together with what is planned for the next 12 months. This should include evidence of website entries; numbers of site hits; an understanding of how social media has been utilised to drive web traffic; copies of brochures, adverts and entries in accommodation guides. Where applicable, justification should be provided as to why various marketing methods have not been used.
Please supply a copy of your Business Plan. If you do not have one then, as a bare minimum, please provide a summary of your Business Activity and Target Markets over the last 12 months and what is planned for the next 12 months.

### 3) Financial Information

Audited Profit and Loss Account covering the previous three years.
*Abridged Accounts may be acceptable subject to agreement with the Development Management Team
Net income from rooms
Net income from food and beverages
Any other net income generated from the business
Net achieved room rate
Trading profit before interest, tax, depreciation and amortisation
Breakdown of annual running costs for the business over the last 3 years including: wages, utilities, rates, food, beverage, additional guest services, administration costs, laundry, insurance, business to customer marketing, bank interest/charges, staff training and any other operating costs
Number of people employed including applicant and applicants family split full time and part time

#### **4) Business planning and performance against targets**

If no recent trading history exists, an annual business plan with cash flow projections is expected to be submitted, which could include (where applicable) a business plan used to secure a bank loan/financial investment and should also include the detailed running costs outlined above under the 'Financial Information' section. However, if a Business Plan does not exist then applicants should provide written justification as to why one has not been prepared.

#### **5) Details of the physical condition of the property**

Where the physical condition of the property is being used as a reason for impacting upon the future viability of the business, a surveyor's report incorporating the costs of repairs should be submitted. These costings should be competitive and where possible details of tradesman's quotes should be submitted.

#### **6) Commercial marketing of the business**

Evidence should be submitted that there has been a realistic attempt to sell the business normally over a minimum 18 month period. It is expected that the business should be marketed at a realistic and competitive price. The evidence should include:

- Details of the agent used to market the business for sale, including whether they have any local or specialist expertise, and evidence of passive/ active marketing.
- Copies of advertising material to include sale particulars, website entries, brochures, etc,
- Details of dates advertised, records of responses received, what interest has been shown and why any offers have been rejected,
- Details of owners' brief to agent on the marketing of the business and agreed sale price.

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Steve Thompson, Director of Resources
<b>Relevant Cabinet Member:</b>	Councillor Simon Blackburn, Leader of the Council
<b>Date of Meeting:</b>	6 November 2017

## TREASURY MANAGEMENT HALF-YEARLY PROGRESS REPORT TO THE 30 SEPTEMBER 2017

### 1.0 Purpose of the report:

1.1 The Treasury Management Half-Yearly Progress Report for the year ended 30th September 2017 and its annexes 1 to 7.

### 2.0 Recommendation:

2.1 To note the report concerning Treasury Management activities for the six months to September 2017.

### 3.0 Reasons for recommendation:

3.1 The Council has already adopted CIPFA's Treasury Management in Public Services Code of Practice and Cross-Sectoral Guidance Notes (2011 Edition). A feature of the Code is that periodic reports on Treasury Management activities are submitted to the Executive and the report, circulated under separate cover, relates to Treasury Management activities for the six months to 30 September 2017.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

None.

**4.0 Council Priority:**

4.1 The relevant Council Priority is:

“The economy: Maximising growth and opportunity across Blackpool”

**5.0 Background Information**

5.1 The Council has adopted CIPFA’s Treasury Management in Public Services Code of Practice and Cross-Sectoral Guidance Notes (2011 Edition). A feature of the Code is that periodic reports on treasury management activities are prepared. This report relates to treasury management activities for the six months to 30 September 2017 and its content is reflective of the scale of the Council’s current Capital Programme.

5.2 Does the information submitted include any exempt information? No

5.3 **Is the Corporate Delivery Unit aware of this report?** Yes

The Corporate Delivery Unit has been consulted on the report but does not have any issues to raise.

**5.4 List of Appendices:**

Appendix 5a: Report on Treasury Management for the six months to 30 September 2017

Annex 1 – Bank of England Official Base Rate November 2007 to September 2017

Annex 2 – Borrowing Rates September 2007 to September 2017

Annex 3 – External Debt Fallout Chart as at 30<sup>th</sup> September 2017

Annex 4 – Summary Statistics for April to September 2017

Annex 5 – Interest Earned on Temporary Investments 2017/18

Annex 6 – Prudential Indicators 2017/18

Annex 7 – Authorised Limit and Operational Boundary, Prudentially, funded schemes 2017/18

**6.0 Legal considerations:**

6.1 None.

**7.0 Human Resources considerations:**

7.1 None.

**8.0 Equalities considerations:**

8.1 None.

**9.0 Financial considerations:**

9.1 Please see the Report and its Annexes 1 to 7.

**10.0 Risk management considerations:**

10.1 Interest rate movements and planned debt fallouts and amounts and the nature of borrowing to fund capital expenditure.

**11.0 Ethical considerations:**

11.1 None.

**12.0 Internal/ External Consultation undertaken:**

12.1 With the Council's Treasury Management Panel.

**13.0 Background papers:**

13.1 None.

**14.0 Key decision information:**

14.1 Is this a key decision? No

14.2 If so, Forward Plan reference number:

14.3 If a key decision, is the decision required in less than five days? N/A

14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed:

Date approved:

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1

**18.2 Date of Decision:**

**19.0 Reason(s) for decision:**

**19.1 Date Decision published:**

**20.0 Executive Members in attendance:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1



**BLACKPOOL COUNCIL**  
**REPORT**  
**of the**  
**DIRECTOR OF RESOURCES**  
**to the**  
**EXECUTIVE**  
**on**  
**6 NOVEMBER 2017**

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**TREASURY MANAGEMENT HALF-YEARLY PROGRESS REPORT**  
**TO 30 SEPTEMBER 2017**

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**1. INTRODUCTION**

The Council has adopted CIPFA's Treasury Management in Public Services Code of Practice and Cross-Sectoral Guidance Notes (2011 Edition). A feature of the Code is that periodic reports on treasury management activities are prepared. This report relates to treasury management activities for the six months to 30 September 2017 and its content is reflective of the scale of the Council's current Capital Programme.

On the 23 June 2016 the UK voted to leave the European Union. The UK Government is currently negotiating with the EU over the terms of departure and the future trading relationship that will exist between the two entities. The Bank of England expects that interest rates may fluctuate during the negotiation period and that share prices will be volatile.

**2. BORROWING TRANSACTIONS**

**2.1 Overview**

The Bank of England Official Bank Rate (ie. the 'base rate' short-term interest rate to which all interest rates are related) stood at 0.25% on 1<sup>st</sup> April 2017 (0.5% on 1<sup>st</sup> April 2016). Since the beginning of the 2017/18 financial year, the rate has stayed constant at 0.25%. As of 30<sup>th</sup> September 2017 the rate remains at 0.25%.

Annex 1 shows movements in the base rate from November 2007 to September 2017 in order to display the recent trend.

Annex 2 shows movements in the borrowing rates available since September 2007 for Public Works Loan Board (PWLB) long-term (20-25 year rates), PWLB one year and variable one month rates.

The uncertainty brought about following the UK vote to leave the European Union and

economic fears over the impact of inflation on the UK economy has continued to depress the financial markets during the last 12 months. As a result the cost of short-term borrowing continues at historically low levels. The market expectation is that the bank base rate will increase gradually during the next 12 months but will still remain below the level which existed prior to the 2008 financial crisis.

## 2.2 Loans Raised

The long-term borrowing requirements for the 2017/18 Capital Programme have been deferred until such time that interest rates are judged to be favourable to the Council. This action reduces the Council's exposure to counterparty risk whilst enabling savings to be made in long-term borrowing costs. The Treasury Management Panel's view is that there will be no need to take any new long-term borrowing to finance the Capital Programme in the next 6 months.

Temporary borrowing has been required to deal with the normal peaks and troughs of the cash flow, including creditor payments, grant receipts, etc. It has also been used to finance any shortfalls in cash flow caused by capital expenditure. The temporary financing of capital expenditure is prudent while short-term interest rates remain low and has the advantage of minimising temporary investments and the associated counterparty risk.

In July 2017 £9,230k was borrowed from the Public Works Loan Board to finance lending from Business Loans Fund. The loan was taken on an Equal Instalments of Principal basis over 10 years at 1.48%.

## 2.3 Loans Repaid

Loans repaid include the repayment of £659k in respect of the Business Loans Fund and the temporary borrowing referred to in 2.2 above. Within the PWLB loans portfolio £1,000k was repaid at maturity on 16<sup>th</sup> July 2017.

## 2.4 Summary

The Council's borrowing activities for the first half-year of the financial year are summarised below:

Source of funding:	Borrowings 1 <sup>st</sup> April '17 £000s	Loans raised £000s	Loans repaid £000s	Borrowings 30 <sup>th</sup> Sep '17 £000s
PWLB	47,153	9,230	(1,659)	54,724
Market Loans	38,000	-	-	38,000
<b>Sub-total</b>	<b>85,153</b>	<b>9,230</b>	<b>(1,659)</b>	<b>92,724</b>
Temporary Loans	91,500	269,500	(251,500)	109,500

LGR debt with LCC	18,818	-	(376)	18,442
<b>Total borrowings</b> <i>(excluding PFI Schemes and finance leases)</i>	<b>195,471</b>	<b>278,730</b>	<b>(253,535)</b>	<b>220,666</b>

Annex 3 to this report shows the maturity profile for the £92.7m of long-term external loans (ie. the PWLB and market debt only from the above table) outstanding at the end of September 2017. The maturity profile is in line with the Council's approved strategy.

### 3. TRANSACTIONS FOR THE FIRST HALF OF 2017/18

#### 3.1 Level of Investments

Annex 4 to this report sets out an analysis of the Council's receipts and payments during the first half of the financial year. The Council's temporary investments stood at £5.35m on 30<sup>th</sup> September 2017. This compares with temporary investments valued at £10.7m on 30<sup>th</sup> September 2016. Temporary surplus funds are invested in accordance with the Treasury Management Strategy's requirements regarding security, liquidity and yield.

#### 3.2 Investment Earnings

The Council takes advantage of peaks and troughs in receipts and payments by investing surplus funds over appropriate timescales within the context of the Council's overall cash flows. The actual investment interest earned to 30 September 2017 was £9k excluding interest received on the Local Authority Mortgage Schemes. Annex 5 shows a monthly analysis of interest receipts compared to budget.

#### 3.3 Approved Investment Institutions

In order to manage prudently any surplus funds as set out within the Treasury Management Strategy the Council restricts its temporary investments to an authorised list of institutions. According to the creditworthiness of each institution, an appropriate investment ceiling has been set with each as well as a maximum investment period. The credit ratings are monitored on a regular basis and checks are made via the internet and other media sources for signs of banks and building societies in difficulty. Council officers continue to use their contacts in the money market and speak regularly with other members of the Manchester Treasury Group to obtain market intelligence.

The Treasury Management Panel includes the Director of Resources, Chief Accountant, representatives from Corporate Finance and Blackpool Coastal Housing and meets regularly throughout the year to review the list of approved investment institutions.

For banks the approved list is based on credit ratings issued by Fitch (single A categories or above, or the equivalent from other ratings agencies). The list also includes the more stable building societies, banded according to total asset size.

The proportion of temporary investments placed in the period 1<sup>st</sup> April 2017 to 30<sup>th</sup> September 2017 across the various categories of approved institutions is set out in the table below:

Type of institution invested with:	Amount £000s	% of total
UK banks and UK subsidiaries of overseas banks	88,000	35.6%
Building societies	7,100	2.9%
Other Local Authorities	14,000	5.7%
Debt Management Office - deposit facility	137,900	55.8%
<b>Total temporary investments placed</b>	<b>247,000</b>	<b>100.0%</b>

These values show the total of all new investments made during the six months. Due to the recycling nature of investing and lending, these values are NOT the absolute value of our portfolio of temporary investments as at 30<sup>th</sup> September 2017, which was £5.35m.

Annex 4 to this Report shows how the investing and maturing of temporary investments fits in with the rest of the Council's bank transactions.

### 3.4 Markets in Financial Instruments Directive 2 (MiFID II)

The Markets in Financial Instruments Directive 2 (MiFID II) comes into force on the 3<sup>rd</sup> January 2018. Under the directive local authorities will no longer be considered by default to be treated as a professional client but instead will be treated as retail investors. The Council's treasury activities require that it has access to financial intermediaries including money brokers. Therefore it will be opting-up to professional status prior to January 2018.

### 3.5 Group Companies and Partners

During the past 12 months the Council has continued to provide advice and assistance to some of our group companies and partners. In particular the Council has offered advice to Blackpool Housing Company about how best to manage peaks and troughs of working capital. The Council transfers funds to the Blackpool Housing Company Limited only when they are needed to cover property acquisition and development costs, £7.55m was paid over by the 30<sup>th</sup> September 2017. The Council also provided £5.6m in loans to Blackpool Transport for the purchase of replacement buses. Further loans of £6.94m will be provided to Blackpool Transport later in the year.

### 3.6 Blackpool Airport

On the 12 of September 2017 the Council paid £4.25m for all the remaining shares in Blackpool Airport. This strategic acquisition will help to bolster the regeneration plans for the Enterprise Zone area of the town whilst protecting valuable jobs in and around the airport complex.

## 4. TREASURY MANAGEMENT BUDGET MONITORING 2017/18

The month 6 financial performance monitoring report, shows an adverse forecast outturn for Treasury Management in 2017/18 of £475k. The main components of this adverse position are as follows:

	£'000s
Interest Received on Business Loans Fund lending	1,281
Lower financing costs on long term debt	(768)
Temporary interest on short term loans	(38)
<b>Net (favourable)/adverse outturn forecast</b>	<b>475</b>

## 5. PRUDENTIAL CODE FOR CAPITAL FINANCE

5.1 Where capital expenditure has been incurred which is financed by debt assumed under the *Prudential Code For Capital Finance In Local Authorities*, budget has been vired from the service area incurring the spend. This budget is used to pay for the additional capital financing costs which are incurred within Treasury Management as a consequence of the capital spend. In the case of Leisure Assets an actual charge for financing costs has been made to the scheme. The cost to the Council of employing its capital in these schemes arises from both the interest cost of the investment and from the subsequent need to repay the principal.

Cost savings or revenue increases within the services as a result of the capital investment will have been previously identified within a business case in order to demonstrate that these schemes are self-funding or better.

### 5.2 Prudential Indicators

At its meeting of 23rd February 2017 the Council adopted the framework set out within *CIPFA's Prudential Code For Capital Finance In Local Authorities (2011 edition)*.

The Code requires that monitoring of our performance against the performance indicators (the Prudential Indicators) is reported to the appropriate decision-making body.

Annex 6 to this report shows the Prudential Indicators from 1st April 2017 to 30th September 2017, separately identifying the affordability indicators, the indicators of prudence and the treasury management indicators.

The format of these indicators is set out in the CIPFA Code of Practice.

Performance in the first half of 2017/18 is in line with expectations.

### **5.3 Capital Schemes Funded by Prudential Borrowing**

Annex 7 to this report shows the headroom to the authorised (borrowing) limit and operational boundary, and identifies the expenditure on schemes which are prudentially funded by year.

### **5.4 Prudential Code For Capital Finance and Treasury Management Code Consultation**

The Chartered Institute of Public Finance and Accountancy (CIPFA) is reviewing the Prudential Code For Capital Finance and the Treasury Management Code. The main aim of the review is to update both codes so that they are more robust in dealing with the risks surrounding local authorities' increasing commercial activities. The Treasury Management Panel provided its formal response to the consultation at the end of September, welcoming the changes recommended by CIPFA. It is anticipated that the updated codes will be issued by the end of the year for implementation in 2018/19.

## **6. RECOMMENDATION**

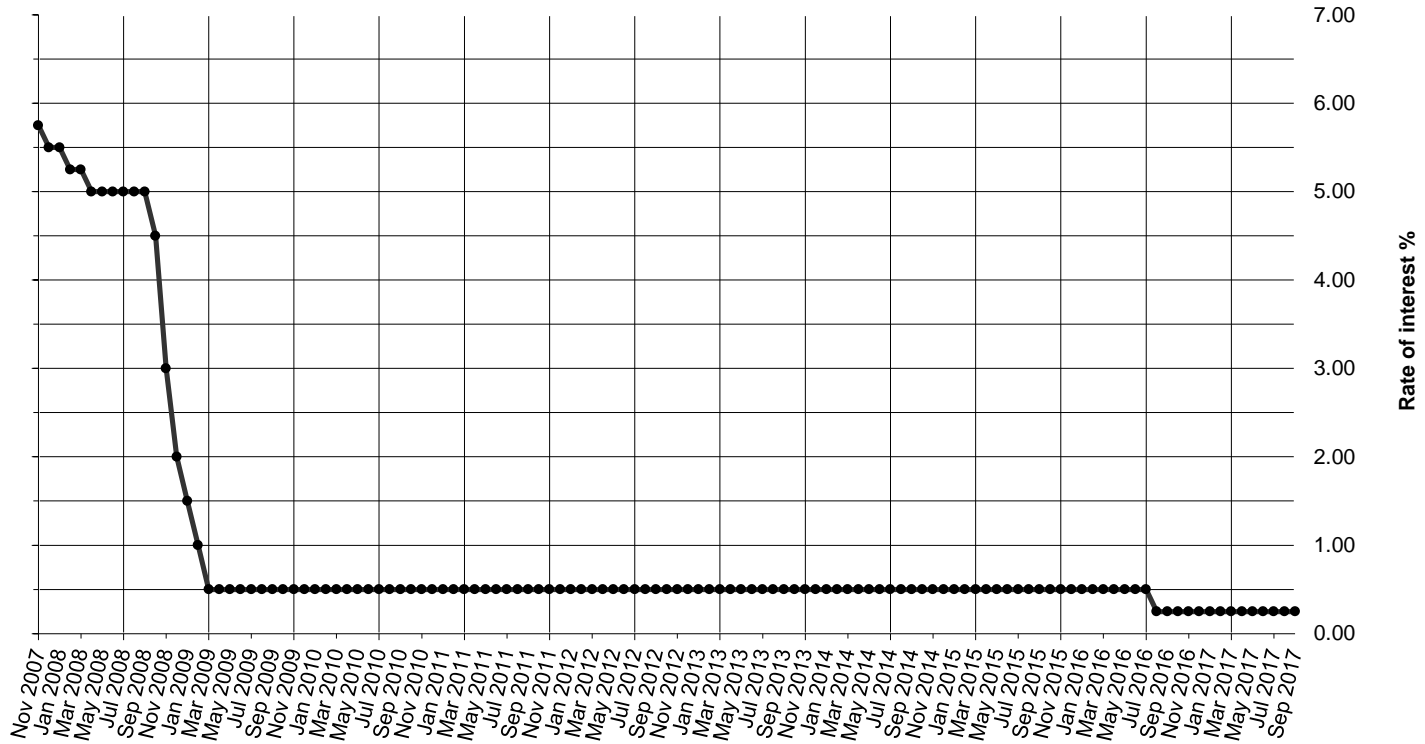
The Executive is asked to note the report concerning treasury management activities for the first half of the 2017/18 financial year.

Steve Thompson

Director of Resources

6 November 2017

Bank of England Official Base / Repo Rates 2007 - 2017

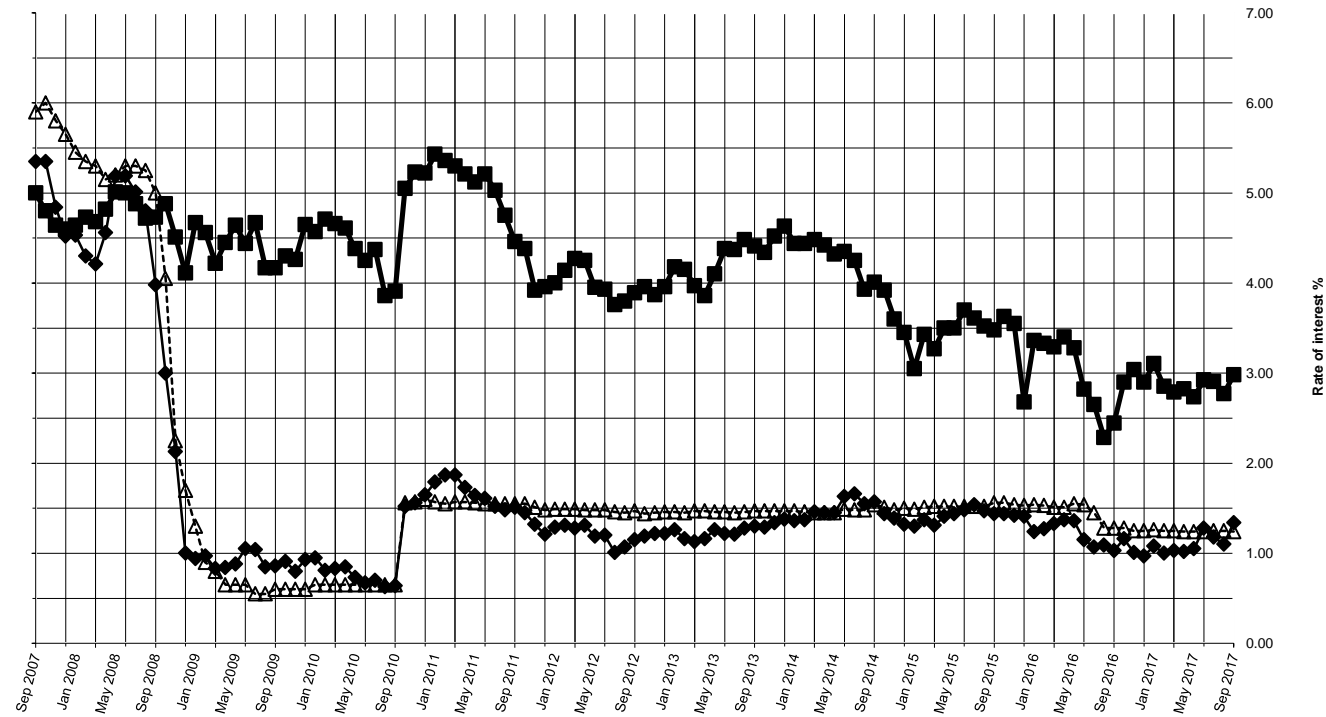


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### Borrowing rates available 2007 - 2017

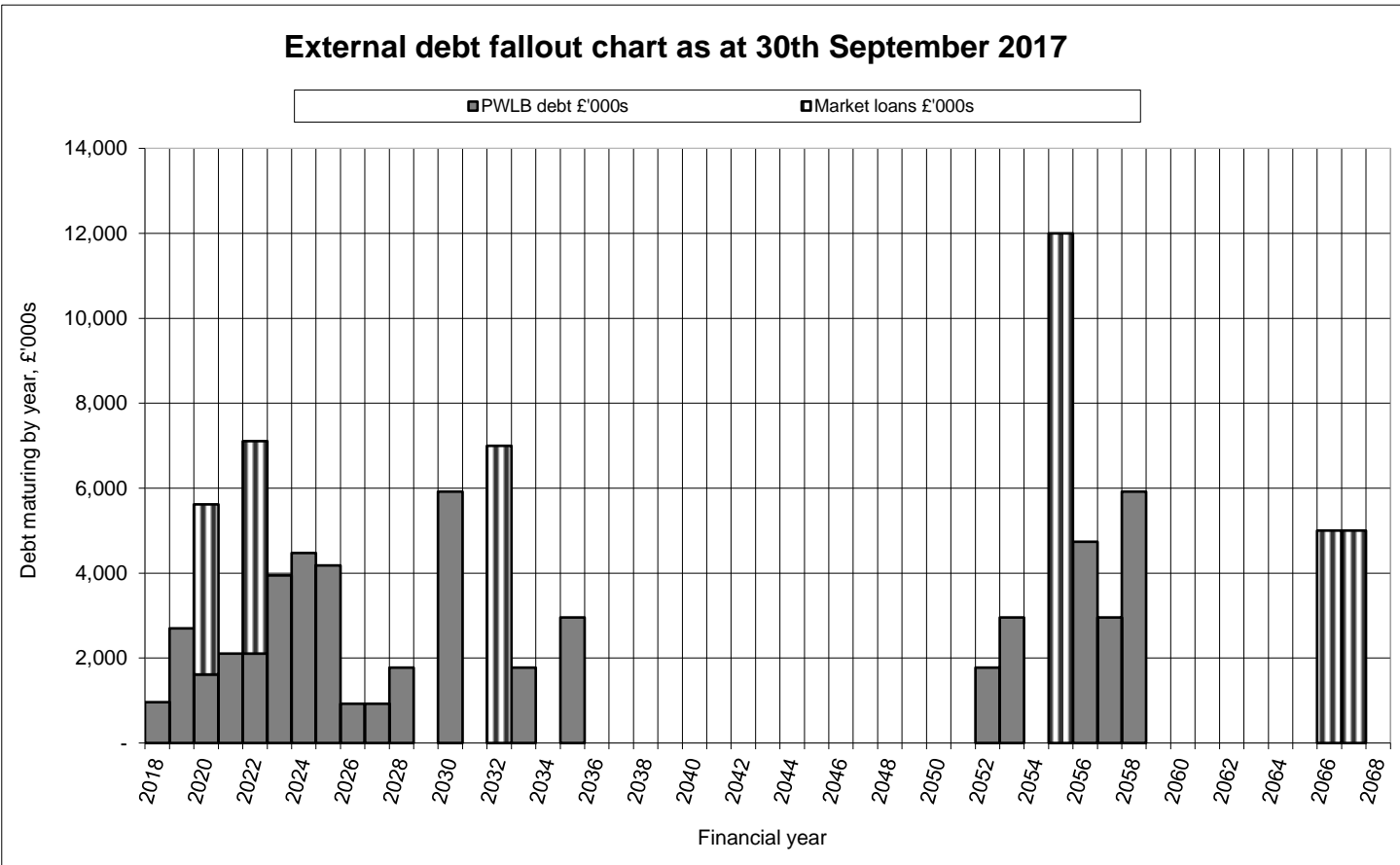
◆ PWLB 1 Year Borrowing Rate    ■ PWLB Long Term (20-25 years) Borrowing Rate    ▲ Short Term (1 mnth) Variable Borrowing Rate



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Annex 3

External debt fallout chart as at 30th September 2017



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## Summary Statistics for April to September 2017.

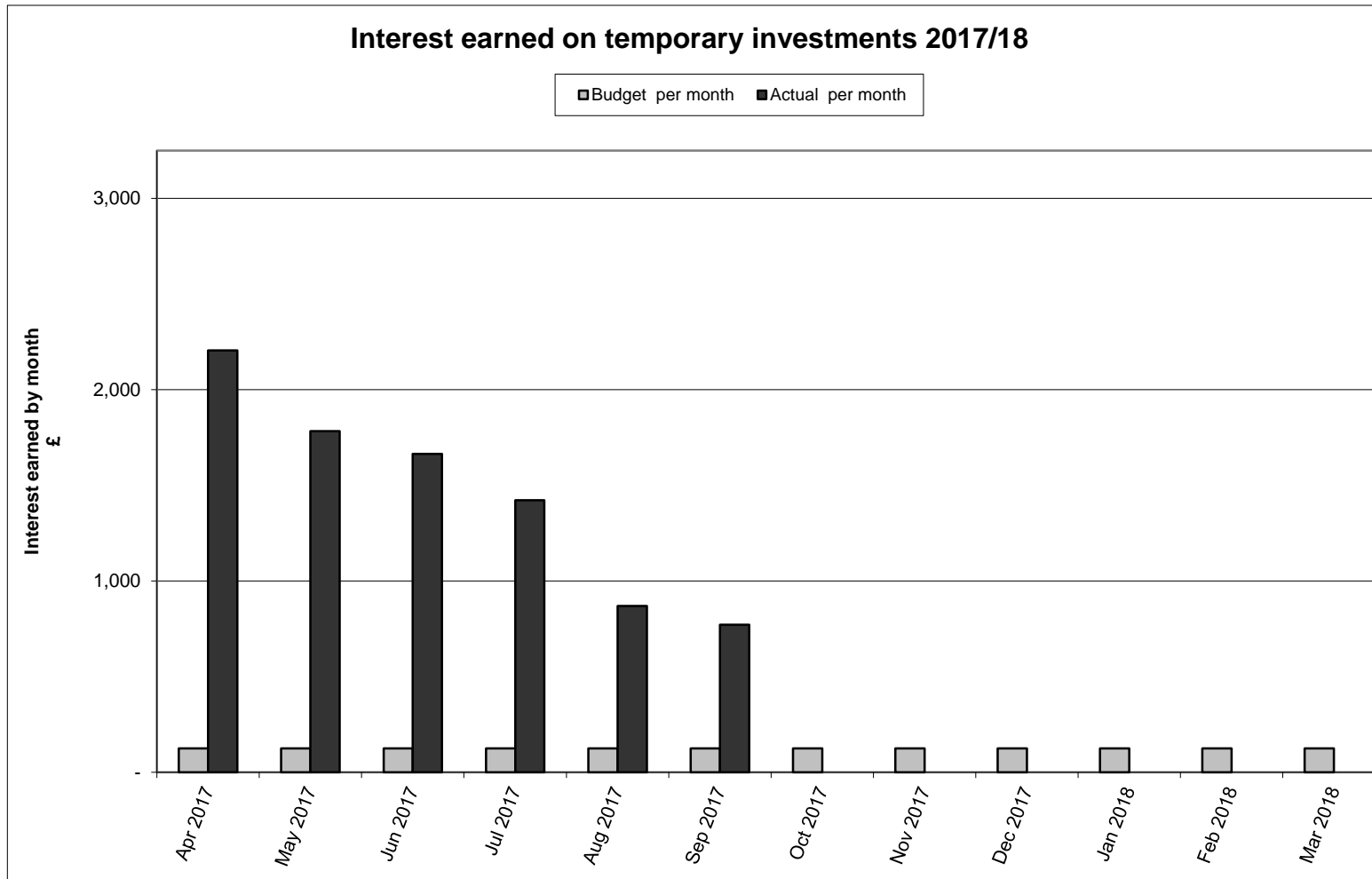
<b>OVERALL DEBT FINANCING POSITION</b>			
<b>B/Fwd</b>		<b>Change YTD</b>	<b>C/Fwd</b>
<b>1st April</b>			<b>30th Sept</b>
<b>£'000</b>		<b>£'000</b>	<b>£'000</b>
4,000	Investments	(400)	3,600
6,700	Bank Deposits	(4,950)	1,750
<b>10,700</b>	<b>Total Investments</b>	<b>(5,350)</b>	<b>5,350</b>
91,500	Short term loans	18,000	109,500
103,971	Long term loans (*)	7,195	111,166
<b>195,471</b>	<b>Total Loans</b>	<b>25,195</b>	<b>220,666</b>
<b>184,771</b>	<b>Total Loans less total investments</b>		<b>215,316</b>

(\*) These include Local Government Reorganisation debt held on our behalf by LCC.

<b>TRANSACTIONS IN THE SIX MONTHS</b>		<b>£'000</b>
		<b>YTD</b>
<b>RECEIPTS</b>		
Loans borrowed	(**)	278,727
Investments matured	(**)	252,350
Housing Benefit		37,410
Council tax and NNDR		47,651
VAT		6,796
RSG		38,694
Other Grants		33,188
Other Income		57,624
<b>TOTAL</b>		<b>752,440</b>
<b>PAYMENTS</b>		
Police & Fire		4,490
General Creditors		173,832
Salaries & wages		41,910
Loan repayments	(**)	253,535
Investments made	(**)	247,000
Housing Benefits		32,000
<b>TOTAL</b>		<b>752,767</b>
		<b>£'000</b>
<b>Opening bank balances</b>		<b>509</b>
<b>Receipts as analysed above</b>		<b>752,440</b>
<b>Payments as analysed above</b>		<b>752,767</b>
<b>Closing bank balances: 30.9.17</b>		<b>182</b>

(\*\*) These values show the totals of all movements on temporary investments and loans during the six months. Due to the recycling nature of investing and lending, these values are NOT the absolute value of our portfolio of temporary balances as at 30th September 2017.

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Annex 6

**Blackpool Council**  
**Prudential Code for Capital Finance**  
**Prudential Indicators 2017/18**

<u>Council T/M Report (23.02.2017)</u> <u>Annex C refs.</u>	<u>Prudential Indicator</u>	<u>17/18 Full year planned PI</u>	<u>17/18 First half year actual PI</u>
<i>Prudential Indicators: the actual position 2017/18</i>			
2.4	Actual Capital Expenditure, non-HRA. 17/18	To be reported after the 31.3.18 year end.	<i>This Prudential Indicator is fully disclosed within the capital reporting.</i>
2.4	Actual Capital Expenditure, HRA. 17/18	To be reported after the 31.3.18 year end.	<i>This Prudential Indicator is fully disclosed within the capital reporting.</i>
5.2	Actual Capital Financing Requirement as at 31/03/18	<b>£354M.</b> (including PFI schemes)	<i>This Indicator is for the full year only and will be reported after the 31.3.18 year end.</i>
5.2	Actual External net borrowing as at 31/03/18	<b>£332M</b> (including PFI schemes)	<i>This Indicator is for the year end only and will be reported after the 31.3.18 year end.</i>
<i>Prudential Indicators for Affordability</i>			
2.1	The ratio of financing costs to net revenue stream, non-HRA. 17/18	<b>13.9%</b>	<b>11.8%.</b> Based on forecasted borrowing costs and revenue streams.
2.2	The ratio of financing costs to net revenue stream, HRA. 17/18	<b>3.2%</b>	<b>2.1%.</b> Based on forecasted borrowing costs and revenue streams.
3.1	Estimates of the incremental impact of capital investment decisions on the Council Tax, non-HRA. 17/18	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>
3.2	Estimates of the incremental impact of capital investment decisions on housing rents, HRA. 17/18	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>

**Annex 6**

<u>References</u>	<u>Prudential Indicator</u>	<u>17/18 Full year planned PI</u>	<u>17/18 First half year actual PI</u>																														
<i>Prudential Indicators for Prudence</i>																																	
Capital	Capital Expenditure (including capital commitments), non-HRA. 17/18	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>																														
Capital	Capital Expenditure (including capital commitments), HRA. 17/18	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>																														
5.7	Authorised Limit. 17/18	(*) Borrowing no higher than <b>£280.0M</b> (*) Long Term Liabilities no higher than <b>£74.0M</b>	<b>Current y/e forecast is £225.0M</b> <b>Current y/e forecast is £71.0M</b>																														
5.7	Operational Boundary. 17/18	(*) Borrowing no higher than <b>£277.0M</b> (*) Long Term Liabilities no higher than <b>£72.0M</b>	<b>Current y/e forecast is £225.0M</b> <b>Current y/e forecast is £71.0M</b>																														
3.4	Net borrowing and the Capital Financing Requirement.	<b>Borrowing &lt; estimated CFR except in the short term.</b>	<i>This Indicator is being complied with.</i>																														
3.3	Estimates of the Capital Financing Requirement, non-HRA. 31.3.18	<b>£342.6M.</b> Per Budget workings. Including PFI schemes.	<b>£308.1M.</b>																														
3.3	Estimates of the Capital Financing Requirement, HRA. 31.3.18	<b>£11.4M.</b>	<b>£11.4M.</b>																														
<i>Prudential Indicators for Treasury Management</i>																																	
1.3	Adoption of the CIPFA Code of Practice and Cross-Sectoral Guidance Notes on Treasury Management - 2011 Edition.	<b>Adoption.</b>	<b>Adopted.</b>																														
8.8 (Annex B)	Gross Debt Compared to Capital Financing Requirement:	<b>Gross Debt: £332M, CFR: £354M</b>	<b>Current y/e forecast is:</b> <b>Gross Debt £296.0M, CFR £354M</b>																														
8.8 (Annex B)	Variable interest rate exposure. Upper limit. 17/18	<b>£177M</b>	<b>£157M</b>																														
8.8 (Annex B)	Fixed interest rate exposure. 17/18	<b>£354M</b>	<b>£139.0M</b>																														
8.8 (Annex B)	Prudential limits for the maturity structure of fixed interest rate borrowing.	<table border="1"> <thead> <tr> <th></th> <th>Lower limit</th> <th>Upper limit</th> </tr> </thead> <tbody> <tr> <td>&lt; 12 months</td> <td><i>Nil%</i></td> <td><b>18%</b></td> </tr> <tr> <td>12 to within 24 mths</td> <td><i>Nil%</i></td> <td><b>18%</b></td> </tr> <tr> <td>24 mths, within 5 yrs</td> <td><i>Nil%</i></td> <td><b>30%</b></td> </tr> <tr> <td>5 to within 10 years</td> <td><b>2.0%</b></td> <td><b>60%</b></td> </tr> <tr> <td>10 to within 30 years</td> <td><b>2.0%</b></td> <td><b>70%</b></td> </tr> <tr> <td>30 years and above</td> <td><b>15.0%</b></td> <td><b>90%</b></td> </tr> </tbody> </table>		Lower limit	Upper limit	< 12 months	<i>Nil%</i>	<b>18%</b>	12 to within 24 mths	<i>Nil%</i>	<b>18%</b>	24 mths, within 5 yrs	<i>Nil%</i>	<b>30%</b>	5 to within 10 years	<b>2.0%</b>	<b>60%</b>	10 to within 30 years	<b>2.0%</b>	<b>70%</b>	30 years and above	<b>15.0%</b>	<b>90%</b>	<table border="1"> <thead> <tr> <th></th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td rowspan="6"><i>This indicator is being complied with.</i></td> <td><b>1.0%</b></td> </tr> <tr> <td><b>2.9%</b></td> </tr> <tr> <td><b>16.0%</b></td> </tr> <tr> <td><b>15.6%</b></td> </tr> <tr> <td><b>21.0%</b></td> </tr> <tr> <td><b>43.5%</b></td> </tr> </tbody> </table>		Actual	<i>This indicator is being complied with.</i>	<b>1.0%</b>	<b>2.9%</b>	<b>16.0%</b>	<b>15.6%</b>	<b>21.0%</b>	<b>43.5%</b>
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8.7 (Annex B)	Prudential limits for principal sums invested for periods longer than 364 days.	Not permitted; see Treasury Management Investment Strategy.	<i>This Indicator is being complied with.</i>																														

\* The figure for Long Term Liabilities includes the Capital Teams figures for PFI schemes.

## Blackpool Council

## Authorised Limit and Operational Boundary Control, Prudentially funded schemes, 2017/18

	LCC/ex-LCC debt	External Debt		Total External Debt
		Borrowing	Liability against finance leases & PFI schemes	
	£'000	£'000	£'000	£'000
<b>Total Debt @ 1st April 2017</b>	18,818	176,653	71,000	266,471
New Borrowing taken out YTD 17/18	-	278,730	-	278,730
less: Borrowing repaid YTD 17/18	(376)	(253,159)	-	(253,535)
<b>All debt outstanding as at 30th September 2017</b>	<b>18,442</b>	<b>202,224</b>	<b>71,000</b>	<b>291,666</b>
New short-term borrowing expected before year end	-	150,000	-	150,000
less: Borrowing expected to be repaid before year end	(376)	(145,461)	-	(145,837)
<b>Therefore (debt) forecast @ 31st March 2018</b>	<b>18,066</b>	<b>206,763</b>	<b>71,000</b>	<b>295,829</b>
Authorised limit, 17/18		280,000	74,000	354,000
<b>Therefore, headroom to Authorised limit 17/18</b>		<b>73,237</b>	<b>3,000</b>	<b>58,171</b>
Operational boundary, 17/18		277,000	73,000	350,000
<b>Therefore, headroom to Operational boundary 17/18</b>		<b>70,237</b>	<b>2,000</b>	<b>54,171</b>

Annual Capital Expenditure funded by prudential borrowing

	Year	Total Value of Prudential Schemes	Source of funding (Prudential borrowing or finance leasing)
		£'000	
Prudential Schemes	2004/05	5,933	Borrowing
Prudential Schemes	2005/06	6,272	Borrowing
Prudential Schemes	2006/07	717	Borrowing
Prudential Schemes	2007/08	1,334	Borrowing
Prudential Schemes	2008/09	703	Borrowing
Prudential Schemes	2009/10	16,726	Borrowing
Prudential Schemes	2010/11	3,080	Borrowing
Prudential Schemes	2011/12	39,723	Borrowing
Prudential Schemes	2012/13	11,884	Borrowing
Prudential Schemes	2013/14	41,323	Borrowing
Prudential Schemes	2014/15	6,112	Borrowing
Prudential Schemes	2015/16	1,867	Borrowing
Prudential Schemes	2016/17	15,153	Borrowing
Prudential Schemes	2017/18 (forecasted)	6,700	Borrowing
<b>Cumulative prudentially funded expenditure</b>		<b>157,527</b>	

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<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Steve Thompson, Director of Resources
<b>Relevant Cabinet Member:</b>	Councillor Simon Blackburn, Leader of the Council
<b>Date of Meeting:</b>	6 November 2017

## FINANCIAL PERFORMANCE MONITORING AS AT MONTH 5 2017/18

### 1.0 Purpose of the report:

1.1 The level of spending against the Council's Revenue and Capital budgets for the first 5 months to 31 August 2017.

### 2.0 Recommendation(s):

2.1 To note the report.

2.2 To continue to lobby Government along with other local authorities facing similar pressures, the Local Government Association and the Association of Directors of Children's Services for more funding to cope with the mounting demand and new burdens presenting in Children's Services.

2.3 To require the respective directors and Director of Resources to continue to closely monitor and manage service financial and operational performances, specifically Children's Services, Strategic Leisure Assets, Treasury Management/Business Loans Fund and Parking Services.

### 3.0 Reasons for recommendation(s):

3.1 To ensure financial performance against the Council's Revenue and Capital Budget is kept under review by members.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

None.

**4.0 Council Priority:**

4.1 The relevant Council Priority is:

“The economy: Maximising growth and opportunity across Blackpool”

**5.0 Background Information**

5.1 See reports and appendices circulated to members under separate cover.

5.2 Does the information submitted include any exempt information? No

5.3 Is the Corporate Delivery Unit aware of this report? Yes

The Corporate Delivery Unit has been working with Resources to ensure any service Transformation required by budget savings are addressed in the Delivery Unit workplan .

**5.4 List of Appendices:**

Report

Appendix 1 - Revenue Summary

Appendix 2 - Schedule of Service forecast overspendings

Appendix 3a - Chief Executive

Appendix 3b - Governance and Partnership Services

Appendices 3b/c - Ward Budgets

Appendix 3d - Resources

Appendix 3e - Places

Appendix 3f - Strategic Leisure Assets

Appendix 3g - Community and Environmental Services

Appendix 3h - Adult Services

Appendix 3i - Children’s Services

Appendix 3j - Public Health

Appendix 3k - Budgets Outside the Cash Limit

Appendix 4 - Capital Monitoring

Appendix 5 - Cash Flow Summary

Appendix 6 - General Fund Balance Sheet Summary

All circulated to members under separate cover

**6.0 Legal considerations:**

6.1 None.

**7.0 Human Resources considerations:**

7.1 See reports and appendices circulated to members under separate cover.

**8.0 Equalities considerations:**

8.1 An Equalities Impact Assessment was produced as a part of the budget setting process and remains relevant.

**9.0 Financial considerations:**

9.1 See reports and appendices circulated to members under separate cover.

**10.0 Risk management considerations:**

10.1 Impact of financial performance on Council balances. Financial performance against approved Revenue and Capital budgets.

**11.0 Ethical considerations:**

11.1 None.

**12.0 Internal/ External Consultation undertaken:**

12.1 None.

**13.0 Background papers:**

13.1 None.

**14.0 Key decision information:**

14.1 Is this a key decision? No

14.2 If so, Forward Plan reference number:

14.3 If a key decision, is the decision required in less than five days? N/A

14.4 If **yes**, please describe the reason for urgency:

**15.0 Call-in information:**

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process?

No

15.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**16.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: N/A

Date approved: N/A

**17.0 Declarations of interest (if applicable):**

17.1

**18.0 Executive decision:**

18.1

**18.2 Date of Decision:**

**19.0 Reason(s) for decision:**

**19.1 Date Decision published:**

**20.0 Executive Members present:**

20.1

**21.0 Call-in:**

21.1

**22.0 Notes:**

22.1





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