

Revised Holiday Accommodation Supplementary Planning Document

Consultation Draft

May 2017

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The Council is consulting on this revised Holiday Accommodation Supplementary Planning Document (SPD) which will replace the current Holiday Accommodation SPD, originally adopted in March 2011.

We have undertaken a review of the effectiveness of the SPD and the appropriateness of the Holiday Accommodation Area boundaries and propose to make a number of changes to the SPD.

What are the key changes?

These include:

- Proposed amendments to Promenade guidance (removing reference to fixed quantum)
- Proposed amendments to reflect the updated adopted Local Plan policy framework
- Proposed amendments to the exceptional circumstances test allowing change of use within Holiday Accommodation Areas in certain circumstances including new guidance on the requirements of the viability assessment
- Proposed amendments to text to improve the clarity of the SPD

The HAAs only define where holiday accommodation premises cannot normally change to residential use. 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.

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1 Introduction

1.1 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.

1.2 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.

1.3 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 1).

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 6.

3 Why did we produce a Holiday Accommodation SPD in 2011?

3.1 The **2011 Holiday Accommodation SPD** was produced in response to the key findings of the **Fylde Coast Sub-Region Visitor Accommodation Study** published in 2009, which set the evidence context for planning policy in relation to the provision of visitor accommodation. The study considered the quality, quantity and location of visitor accommodation across the Fylde Coast. It recommended for Blackpool that existing bed spaces would need to be reduced by a minimum of around 15,000 to attain national average occupancy levels. This equated to a minimum reduction of over 400 holiday accommodation properties.

3.2 The findings of the Study suggested more tightly focused resort neighbourhoods, concentrating protection of key conference and resort hotels on the promenade and upon the strongest remaining areas of holiday accommodation off the Promenade.

3.3 In response to the Study and to manage the oversupply of bed spaces, a more flexible policy framework than previously set out in the 2006 Local Plan was developed in the Core Strategy which allows more holiday accommodation to change to residential use than previously. The policy seeks to retain a suitable level of guest accommodation by identifying Holiday Accommodation Areas and promenade hotel frontages in sustainable locations (with easy access to resort facilities and key transport routes and facilities) where change of use to other uses is restricted unless exceptional circumstance can be demonstrated. Outside these areas, holiday accommodation in principle can change to residential use.

4 What are the aims of the Holiday Accommodation SPD?

4.1 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.

4.2 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).

5 Why and how have we reviewed the SPD?

5.1 To ensure the guidance in the SPD is appropriate and effective in its role of contributing to meeting the objectives of the Core Strategy and delivering the intended outcomes, the Council made the decision to review the SPD five years post its adoption.

5.2 As part of the review, we have analysed a considerable amount of data including the change in the amount of holiday accommodation. This analysis informs us 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. The analysis shows that although the character of some of the holiday accommodation areas identified in the 2011 SPD has changed there is still a need to maintain the defined areas. Further information can be found in Appendix 3 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report** (available at: www.blackpool.gov.uk/holidayaccommodation).

Assessing the Holiday Accommodation Areas

5.3 We have reviewed the criteria used in the 2011 SPD and considered it was necessary to simplify the approach. Each HAA street was assessed against the new criteria set out in Table 1 below. Although there have been some changes occurring within the HAAs since 2011 including business closures, unlawful activity and properties on the market, we are proposing to retain the Holiday Accommodation Area boundaries as per the 2011 SPD.

Further information on the criteria and street assessments can be found in Appendix 3 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report** (available at: www.blackpool.gov.uk/holidayaccommodation)

Table 1: Holiday Accommodation Areas Assessment Criteria

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

6 What are we proposing?

6.1 The proposed revised wording of the SPD is set out in this section including the geographical areas where the policy will apply.

Policy on the Promenade

6.2 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.

6.3 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)

What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Key Promenade Hotel Frontages*

6.4 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.

6.5 Within the areas listed below and defined in Appendix 2, 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.

6.6 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)

What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Main Holiday Accommodation Promenade Frontages*
- *In recognition of the significant viability issues in redeveloping parts of the Promenade and in order to encourage high quality holiday accommodation with supporting residential we propose to delete reference to the retention of 'quantum' holiday accommodation floorspace. However, we are proposing to request viability information to justify the mix of holiday/residential uses.*

6.7 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.

6.8 Within the areas listed below and defined in Appendix 3 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.

6.9 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

6.10 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)

What changes are we proposing?

- *In response to the outcome of the review process, there are no proposed changes to the boundaries of the Main Holiday Accommodation Areas*
- *We recognise the significant viability issues faced by holiday accommodation owners and have amended the exceptional circumstances to remove the character test (Further information on the assessment can be found in section 7 of the **Blackpool Holiday Accommodation SPD Review 2016 - Stage 1 Report**)*
- *We will provide clearer guidance on what is required to demonstrate holiday accommodation use of a property is no longer viable.*

6.11 Within the areas listed below and defined in Appendix 4, change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted.

6.12 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

6.13 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

6.14 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.

6.15 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.

6.16 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.

6.17 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.

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

Appendix 1: 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.

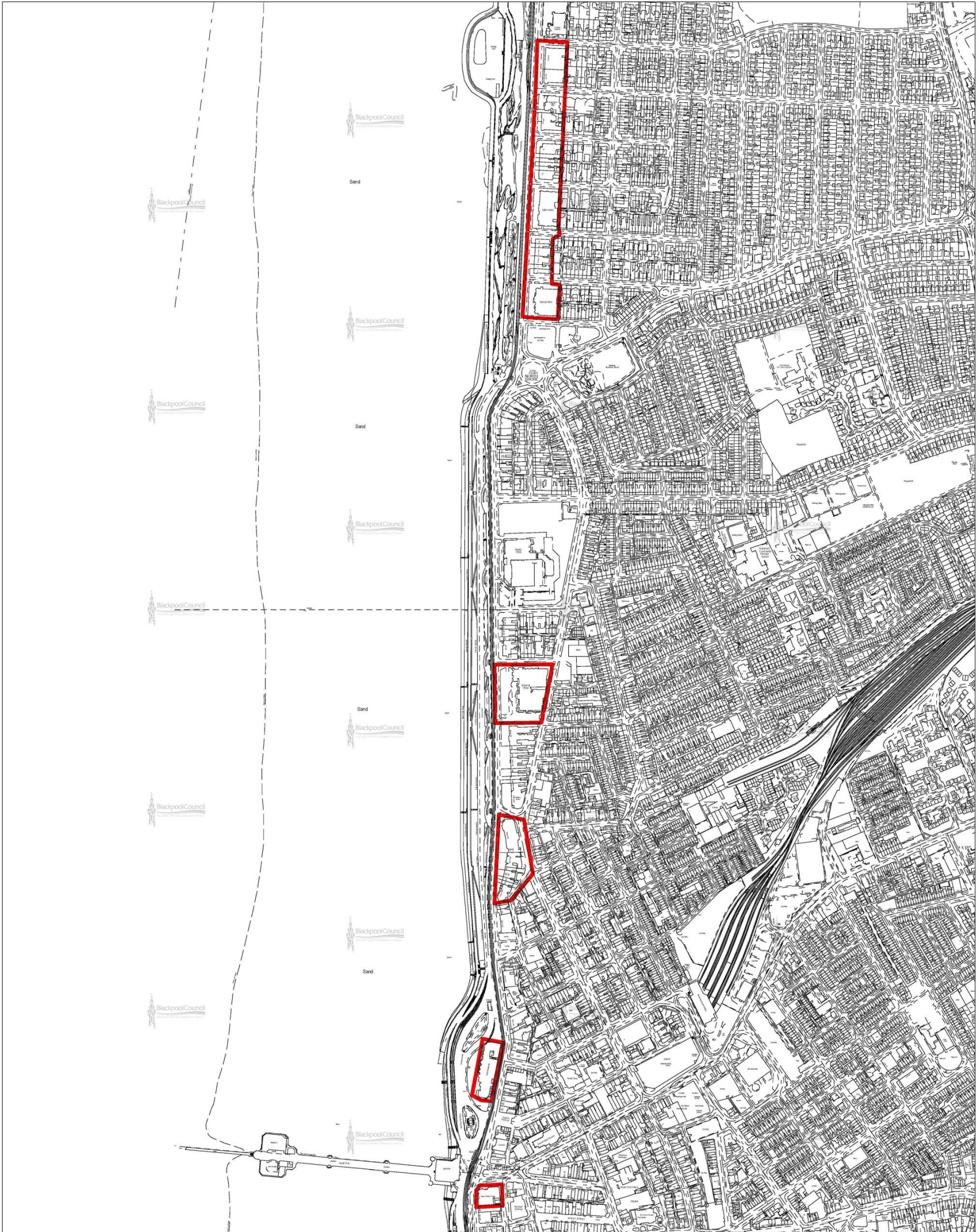
2) Outside the main holiday accommodation areas:

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 2: Key Hotel Promenade Frontages



Queens Promenade to Talbot Square

Appendix 3: Main Holiday Accommodation Promenade Frontage



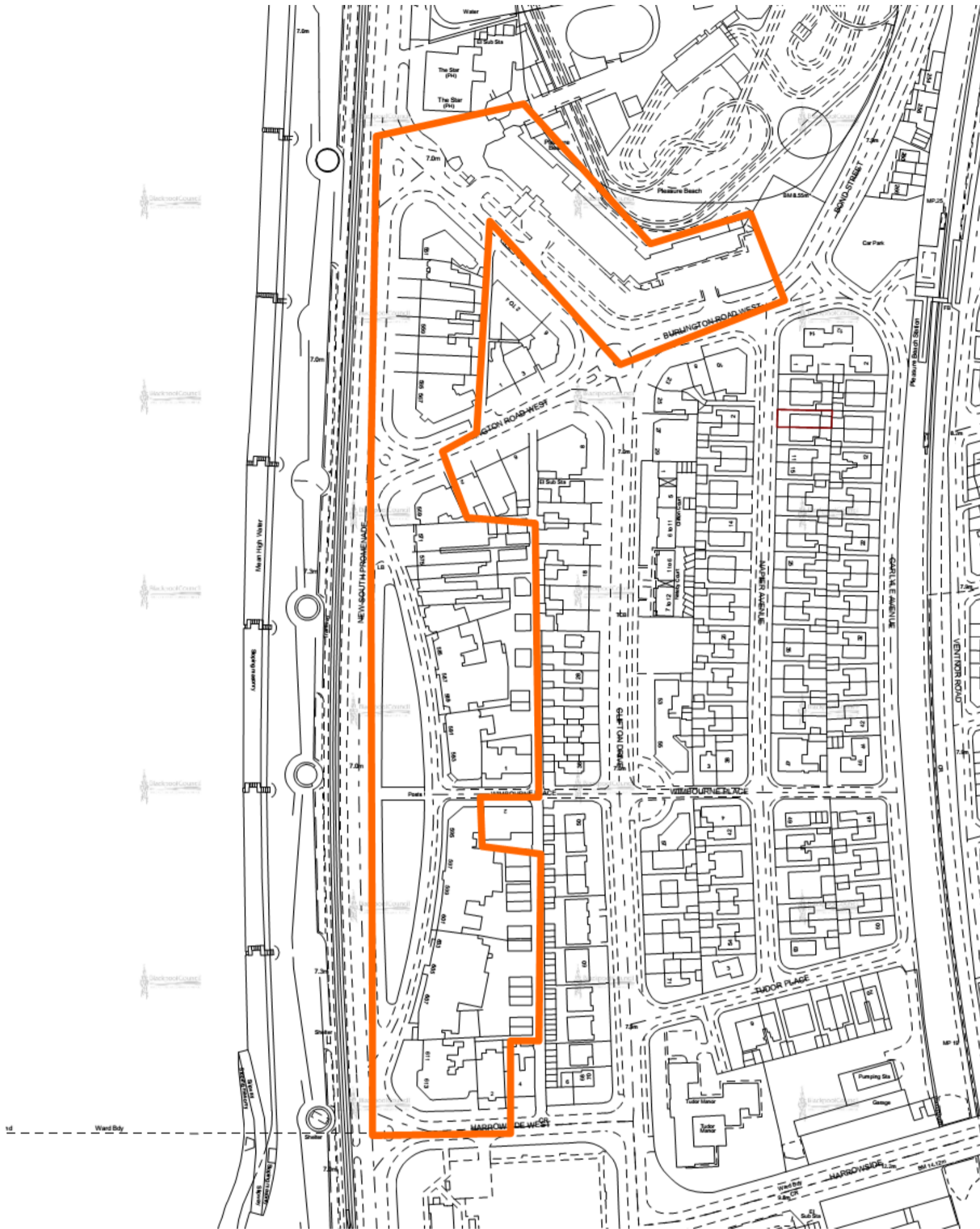
Norbreck Castle and Bispham



Gynn Square to Cocker Square

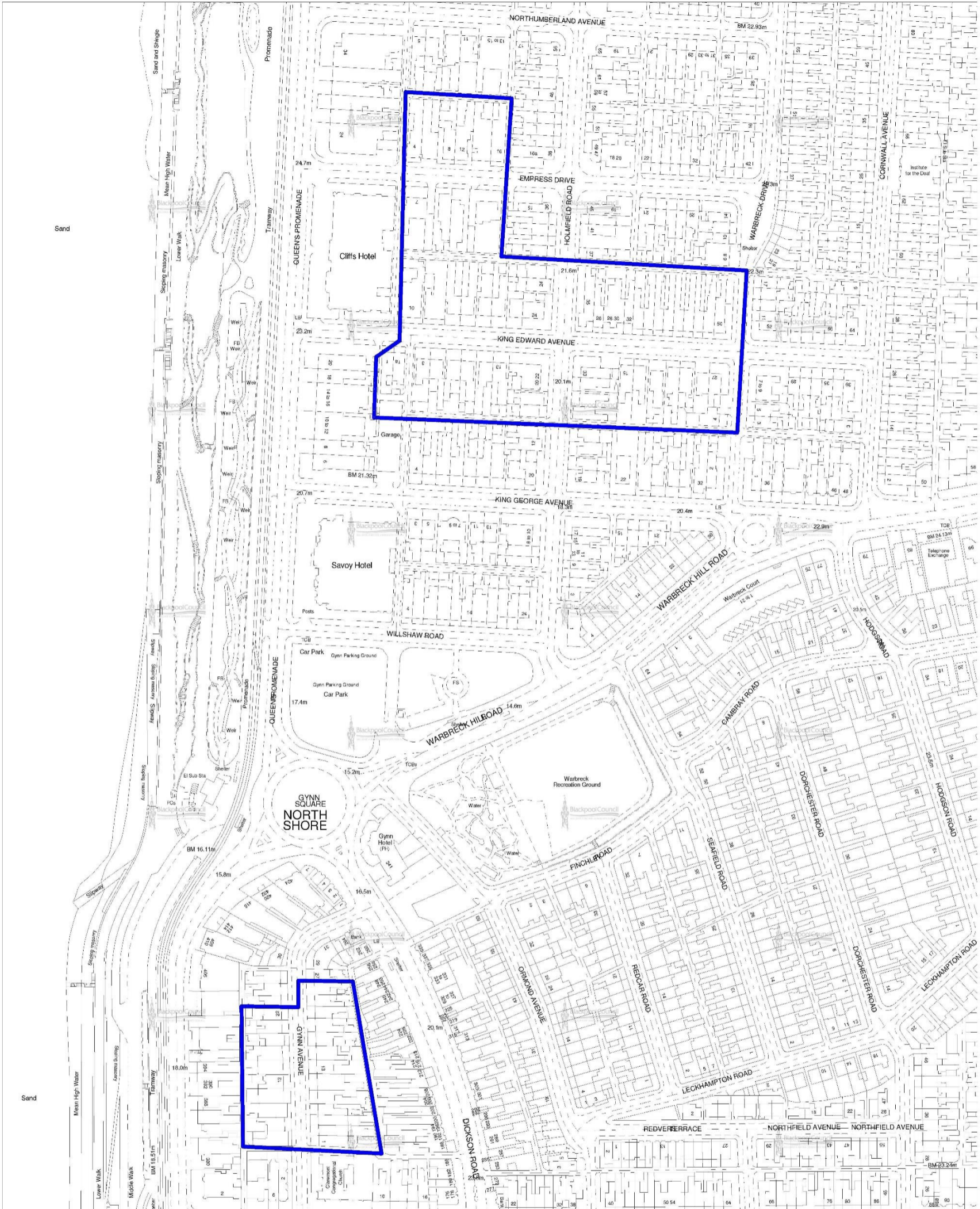


Foxhall/South Beach Promenade Frontage

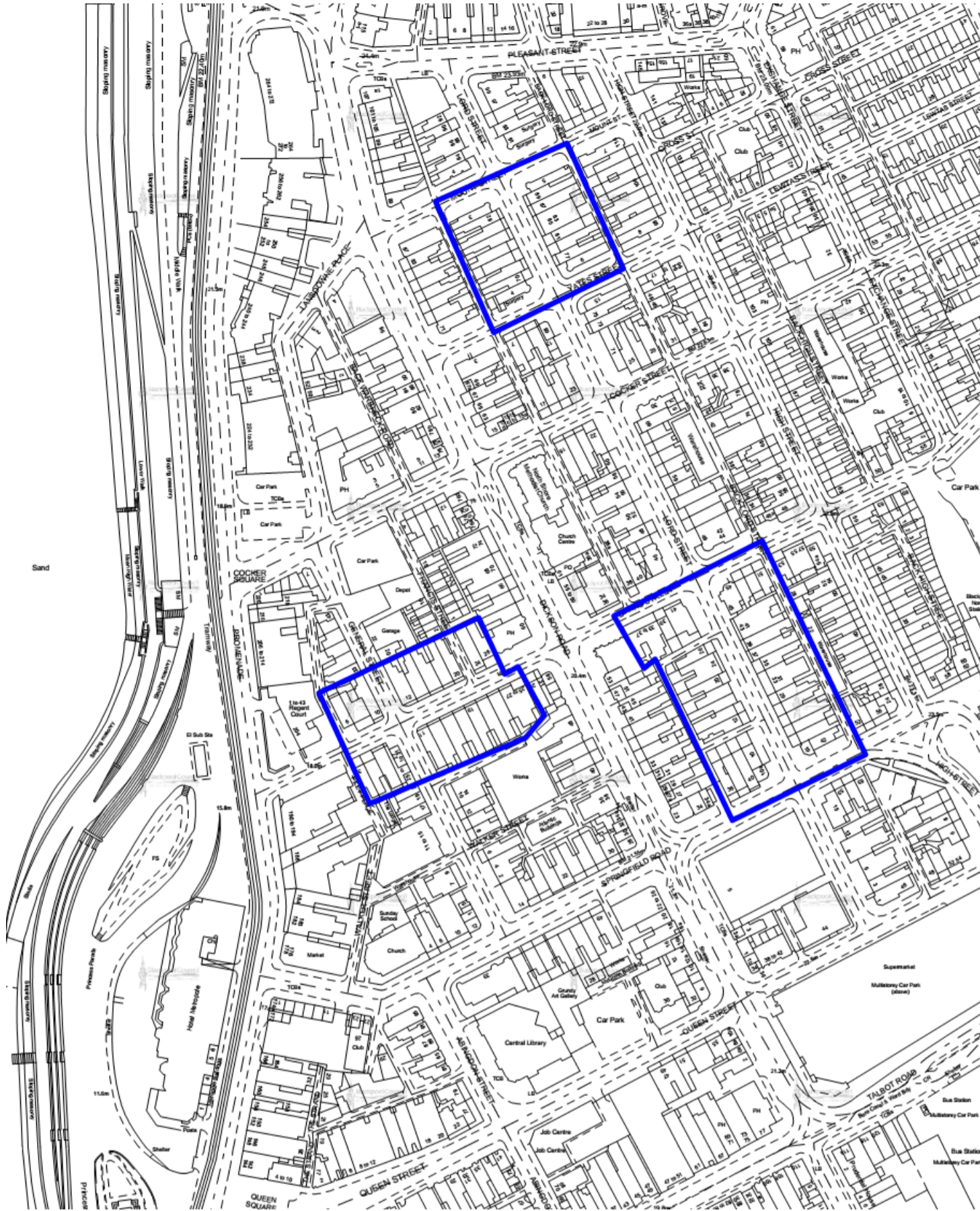


Pleasure Beach Promenade Frontage

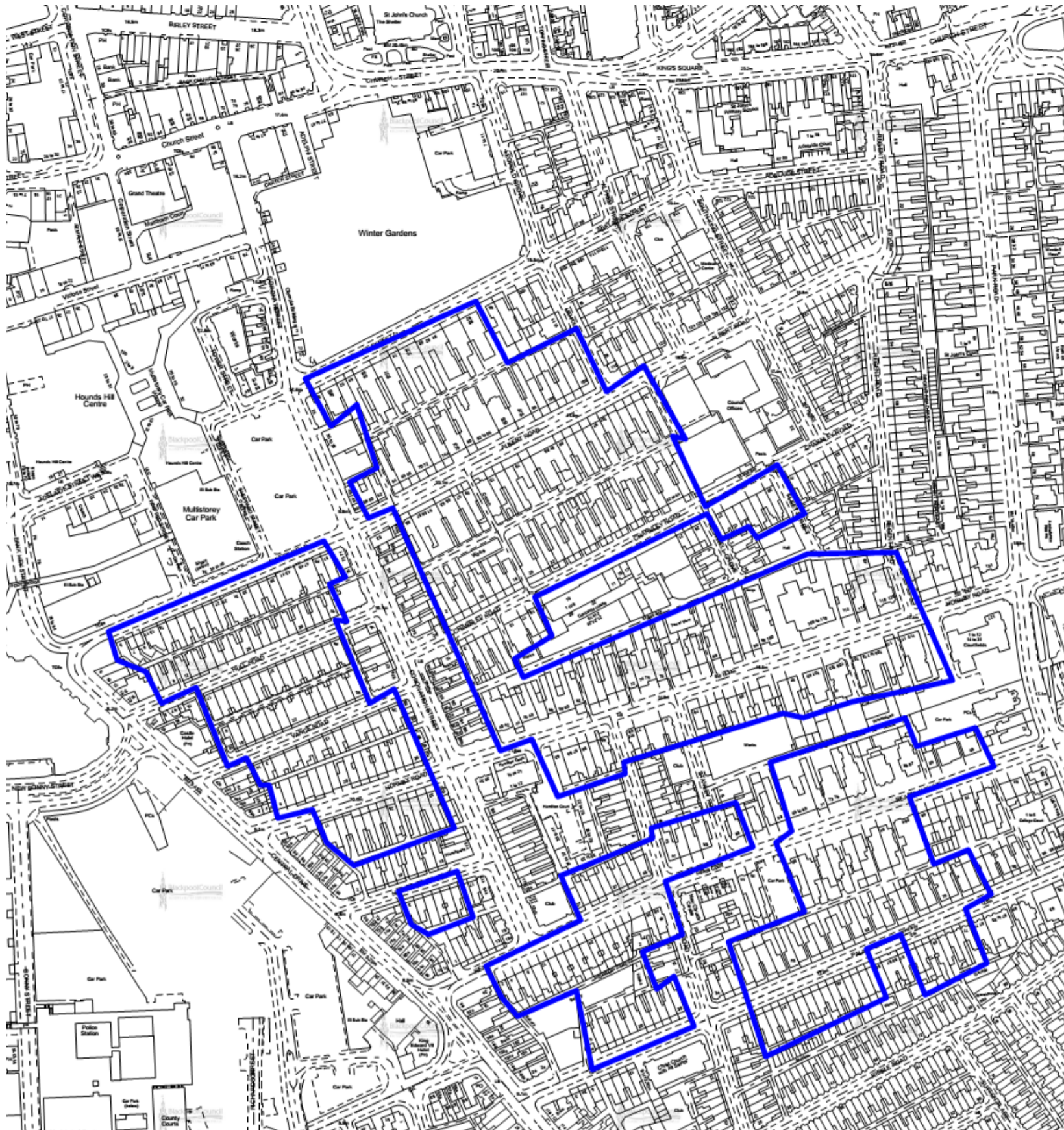
Appendix 4: Off Promenade Main Holiday Accommodation Areas



The Cliffs



North Town Centre



South Town Centre



Foxhall



South Beach



Pleasure Beach