

APPENDIX 2: Preliminary Consultation Responses

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Ref	Topic	Key Issue Raised
a) The current position in the HAA's		
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 85x52x5 = £22.1K/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 160m2. 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

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Ref	Topic	Key Issue Raised
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
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	Need for HASPD

Ref	Topic	Key Issue Raised
	being out.	
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 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) Specific planning issues		
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
c) Perception of the market		
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

Ref	Topic	Key Issue Raised
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 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	Need for HASPD

Ref	Topic	Key Issue Raised
	HAA's.	
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 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.	

Ref	Topic	Key Issue Raised
	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
d) Specific Issues and concerns going forward		
i) HMO's		
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 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

Ref	Topic	Key Issue Raised
ii) Anti social behaviour		
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).	
e) Comments on complementary actions		
i) Licensing generally		
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	
ii) Selective licensing		
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 –	
iii) South Beach selective licensing		
146	covers all private rented in an area	

Ref	Topic	Key Issue Raised
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.	
iv) Claremont (ward) area selective and additional licensing		
154	scheme launched in April 2014 to April 2019	
155	much bigger than South Beach and involves some 1,600 properties	
v) Central additional licensing		
156	The newest area will come into force for 5 years from July 2016	
157	additional licensing only	
158	plan to add selective licensing	
vi) Other initiatives/programmes		
<i>Blackpool Housing Company</i>		
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 1 st 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.	
<i>'transience programme'</i>		
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.	
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'.	

Ref	Topic	Key Issue Raised
<i>'Clusters of empty homes programme'</i>		
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.	
<i>"community protection warning notice"</i>		
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.	
f) Site and area specific comments		
i) The Cliffs and Gynn Avenue		
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
ii) Lord Street Area		
173	No real pressure, gay friendly end of town.	
iii) South town centre		
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

Ref	Topic	Key Issue Raised
iv) Foxhall		
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.	
v) South Beach		
183	Issue on 9/11 Wellington Road	
184	15 Barton avenue – holiday flats to permanent	
185	Woodfield/St Chads – has external character	
vi) Pleasure beach		
186	Dean street – there is one conversion	
vii) Promenade		
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.	

