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Appendix 4b:

Blackpool Holiday Accommodation SPD Review 2016/17

Consultation Statement

October 2017

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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 12th June and July 24th 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 12th 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 28th 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
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
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

Blackpool Holiday Accommodation SPD Review 2016/17

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) 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
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
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	

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
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		

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 –	
iii) South Beach selective licensing		
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.	
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		
Blackpool Housing Company		
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.	
‘transience programme’		
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'.	
'Clusters of empty homes programme'		
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.	
"community protection warning notice"		
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
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	

Ref	Topic	Key Issue Raised
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.	

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

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.

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				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.

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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.

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				<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	<p>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"</p>	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	<p>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</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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				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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				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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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 Councils 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: https://www.blackpool.gov.uk/Business/Licensing-and-permits/Housing-licences/Housing-licences.aspx

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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.

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				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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		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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		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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				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.

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				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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					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

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				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"> • 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. • 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. <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

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		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

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		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.

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				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

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