

COMMITTEE DATE: [22/11/2016](#)

Application Reference: **16/0436**

WARD: Layton

DATE REGISTERED: 18/08/16

LOCAL PLAN ALLOCATION: Open land meeting community and recreational needs

APPLICATION TYPE: Full Planning Permission

APPLICANT: Z Bar Ltd

PROPOSAL: External alterations and use of ground floor of premises as retail shop with associated car and cycle parking and refuse storage.

LOCATION: LAYTON INSTITUTE, WESTCLIFFE DRIVE, BLACKPOOL, FY3 7HG

Summary of Recommendation: Refuse

CASE OFFICER

Ms C Johnson

SUMMARY OF RECOMMENDATION

The principle of a retail use at ground floor level is acceptable. However, given the constraints of the building described below, the Layton Institute does not lend itself physically for a retail use at ground floor level.

The proposal would cause harm in terms of highway safety and as a result of the reduction of the size of the existing community facility and by the loss of some of the bowling green/open space and the effect of this on the significance of the locally listed building.

Therefore, the officer recommendation is to refuse the application.

INTRODUCTION

This is the fourth application in recent years for development and/or change of use of the Layton Institute building and bowling green. The previous applications were:

12/0162 - Erection of seven two-storey dwelling houses with associated car parking, garages, landscaping and access from Granby Avenue. Refused by the Committee on 10 April 2012.

14/0465 - External alterations include two new doors to rear and provision of eight car parking spaces to rear and use of ground floor as altered as retail unit (Use Class A1). Refused by the Committee on 11 August 2014 and an appeal was dismissed on 9 June 2015.

14/0467 - Erection of five two-storey dwelling houses with associated car parking and access from Granby Avenue. Refused by the Committee on 15 July 2014.

An appeal was submitted against the decision to refuse planning application 14/0465 and whilst the Inspector concluded that the principle of retail in this location was acceptable and found there to be no harm to residential amenity as a result of the proposal, the appeal was dismissed for the following reasons:

- the reduction in the size of the existing community facility;
- the impact on highway safety;
- loss of the bowling green/open space and the impact this would have on the character and setting of the locally listed building.

This application seeks to address the reasons for the dismissal of the appeal on the previous application.

SITE DESCRIPTION

The Layton Institute is a red brick building with white terracotta dressed bays and decorations and was built in 1925-6 by Mercer and Duckworth of Fleetwood. It has a bowling green and club house to the rear and within the same curtilage. The Layton Institute sits on the south corner of the Westcliffe Drive and Granby Avenue junction and has approximately 1116 square metres of floorspace over two floors. The bowling area has a frontage of 34 metres to Granby Avenue and a depth of 49 metres.

There are two separate bar areas on the ground floor level serving a lounge and a large snooker hall area. At first floor level there is a bar and a stage serving a concert /events hall (Use Class D2 - Social Club).

The area around Granby Avenue to the north and west is predominantly residential in character, comprising two-storey semi-detached houses with small front gardens areas and/or driveways. To the east and south is the busy Layton District Centre (although the application site is located close to this centre, it is not included within it) which is characterised by ground floor retail units fronting Westcliffe Drive, which is a major transport route connecting the Town Centre with Bispham and Poulton.

There is a cemetery and established trees and bushes along the full length of the southern boundary of the Layton Institute and bowling green.

To the rear of the Layton Institute at ground floor level, adjacent to the bowling green there is an outdoor seating area with retractable canopies to accommodate smokers which is accessed through the lounge. At first floor level there are two large picture windows which give a view over the bowling green and two smaller windows. The main pedestrian access to the building is from Westcliffe Drive.

The building was identified as having strong local, architectural and social significance in Layton's Historic Townscape Characterisation Assessment which was completed by the

Architectural History Practice in August 2009. Subsequently, the Planning Committee agreed to include the Layton Institute on the Local List on 16 December 2013 and the list was formally adopted by the Cabinet Member for Tourism and Culture on 2 April 2014. The building is on the Local List in recognition of its strong architectural presence, its group value along with the bowling green to the rear and its social historical significance.

The application site is shown as unallocated on the Proposals Map to the Blackpool Local Plan 2001-2016.

DETAILS OF PROPOSAL

The proposal is for full planning permission for external alterations including the insertion of a new shop front on the rear elevation to provide access into a new ground floor retail unit (526 square metres of floorspace within Use Class A1) and provision of 10 extra parking spaces on part of the bowling green at the rear, accessed off Granby Avenue and cycle storage.

The current application was originally submitted showing external alterations to the front elevation of the building to provide a shop entrance and extended windows and the provision of one extra parking space to the side. In response to concerns raised by officers regarding the extent of alterations to the front elevation of the building and lack of car parking, amended plans have been submitted showing the entrance to the retail unit on the rear elevation and car parking on part of the bowling green.

The application is accompanied by various financial details and viability information and a Design and Access Statement.

MAIN PLANNING ISSUES

The main planning issues are considered to be:

- Principle of retail development
- Reduction in the size of the community asset
- Impact on the appearance and significance of the heritage asset (locally listed building)
- Highway Safety

These issues will be discussed in the assessment section of this report.

CONSULTATIONS

Built Heritage Manager (comments on original proposal):

I refer to the application relating to The Layton, Westcliffe Drive. The Layton is a locally listed building. The new modern door openings and windows on the main elevation would undermine the historic character of the building and have a serious impact on its heritage value. We could only support the change of use of the ground floor if no alterations were made to the front of the building, and if any changes to the rear did not impact on the bowling green.

Blackpool Civic Trust (comments on original proposal):

The Blackpool Civic Trust are pleased to see a scheme to save this iconic community building which retains some continued community use. We have no objection to the retail use of the ground floor.

We do wish to see retention of the bowling facilities at the rear. We do however object to the proposals for alteration to the frontage of this fine building. We hope that an alternative can be found which retains the pattern of symmetry to the windows and doorways.

Head of Highways and Traffic Management:

14/0465 – The parking requirement for this was calculated to be 15 car parking spaces based on parking standards and floor area, eight spaces actually proposed – a shortfall of seven.

16/0436 – The parking requirement for this is calculated to be 22 spaces (due to increase in floor space compared to 14/0465), 10 spaces proposed with a shortfall of 12.

Whilst I appreciate the proposal site is adjacent the local centre, parking provision is underprovided and this could lead to further inconsiderate parking on Granby Avenue and the surrounding streets. Granby Avenue experiences high levels of parking demand due to the proximity of the district centre and restricted parking bays on Westcliffe Drive.

The additional 10 spaces proposed on Granby Avenue, if implemented, would result in the loss of on-street parking spaces resulting in vehicles that would utilise these spaces transferring further along the same street or others nearby, resulting in a nuisance to residents.

Servicing both the club and the retail unit from the front may result in congestion on Westcliffe Drive if deliveries turn up at the same time so this is not ideal.

I do not feel the current proposal addresses the issues with parking and servicing. The proposal (if supported) could lead to highway safety issues, and on this basis I am not prepared to support this proposal.

Environmental Protection (comments on original proposal):

No comments from a contaminated land perspective as no ground works are being carried out.

PUBLICITY AND REPRESENTATIONS

Site notice displayed: 29 August 2016

Neighbours notified: 25 August 2016

Representations have been received from 5 Alder Grove, 17 Cockerham Walk, 30 Dingle Avenue, 51 Tynedale Road, 51 Westcliffe Drive, 6 and 8 Granby Avenue and 49 Bardsway Avenue.

The comments are summarised below:

- The Layton is a great community asset and has over 100 years of history and is locally listed. One of the criteria used when drawing up the above list is outlined below as Social Value which defines perfectly the role and place of the Layton (ex Layton Institute) in the local environment.
- You can play snooker, watch live bands which are on every Friday and Saturday night and various events take place upstairs from parties, music, art displays and charity events etc.
- The green is a social area used for family fun days and charity events.
- We don't need more shops in Layton.
- You took Christ The King club away from the community, we lost The Windmill to Tesco's, The Dinmore is closed. What more do you want to take from this community? Why on Earth do we need more shops? Why would anyone want to take that away from a community that already has lost so much?
- Another big store would have a big impact on the smaller shops in Layton, leading to their demise.
- I am objecting as there will be no social areas for people to meet and keep up with friends and family.
- The financial details outlined in the supporting documentation are 12 months out of date, and so no current financial statement is available for comment to support continued viability of the business.
- Since August 2015 there have been 65 Private Functions, 16 Charity Events and a weekly Charity Fundraiser. Eight bookings have already been taken for the next couple of months along with two charity events. In October the well-known entertainer Toyah Wilcox is in concert supported by the great Skaface Band. And a date in January 2017 is booked for the acclaimed charity Feetfirstworldwide featuring London band Simmertone with an expected audience of some 350 persons.
- This is in addition to the regular bingo sessions, and raffles, live music every Friday and Saturday nights with Karaoke every Sunday, and of course the numerous snooker and pool teams contributing considerably to the overall finances.
- If the plan to move the club facilities to the first floor materialises it will create other, perhaps insurmountable problems that the plans do not cater for. Namely, if the snooker tables are relocated then you could not have these in use in tandem with artists or bingo etc. unless there was some form of partition/soundproofing, which I don't see in the plans. So there would be a loss of either entertainment support or sports support people as the two don't mix in a single room environment. Plus there will be the inability to close off the room for private function or events such as those shown above unless regular use is denied.
- During fine weather the green area is used as a Beer Garden by families and children can play in a safe environment. In fact there is nowhere else locally where this is permitted.
- To enable the continued use of the green for the various activities and use as a Beer Garden area there is a requirement for the availability of drinks, alcohol or otherwise. Currently no drinks are allowed to be carried up or down stairs as a Health and Safety issue. With an external staircase giving access from the first floor (a metal fire escape in a very poor state of disrepair) there is the added risk of slips and falls due to wet/damp surfaces. This would appear totally unsuitable for the use by families. Otherwise the

only access from the first floor to cater for drinks etc. is via the front entrance where the risk of injury caused by breaking glasses, bottles etc. and upset to pedestrians and shoppers need be considered.

- There is also the question of toilet facilities for people who are using the bowling green. Again these are inside the building on both floors and access can only be gained either via the rear stairs or front club access point. This represent another health and safety issue and is unsuitable for families especially those with young children.
- It's unclear what would happen to the bowling club house or 'hut' as this is in very poor condition.
- Seven car parking spaces is unrealistic as they are already almost always taken up either by club users or others. And where will staff park? In addition, the front on road parking area is restricted by a Taxi Rank not available for normal users between the hours of 8pm-7am. The remainder of the time, 7am-8pm is restricted to loading only.
- Given the dual purpose of the new proposal the traffic congestion could at times be quite substantial along supporting residential streets along with the associated risks and inconvenience to residents, notwithstanding the school with its parents and young children in very close proximity to the premises.
- The proposed new store entrances and prominent Heron food sign which will detract greatly from the existing appearance. The large glazed entrance points and windows will severely detract from the ambiance of the building which has been a focal point for the community for over a hundred years.
- The Layton area is already well served with convenience stores and the like with Tesco, Coop, McColl's, P&G and other smaller outlets all on the main street. Within a short distance there are also Farm Foods and Lidl stores. Currently there are at least six retail outlets already closed within the main Layton high street area and two more being put up for sale. In September 2016 the Yorkshire Bank will close leaving the Layton area without any banking facilities except at the small Post Office within the McColl's store. As a result the reduced footfall in the area will place further pressure on the existing retailers which will only be exacerbated by the arrival of a large new food store.
- The club is an iconic building and does deserve, proper management, consistent use so I'm for the proposal based on wanting to save this building.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) came into force in March 2012 and constitutes guidance for local planning authorities and decision-takers as a material consideration in determining applications.

The core planning principles in the NPPF include:

- Local authorities always seeking to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- Local authorities should encourage effective use of land by re-using land that has previously been developed provided that it is not of high environmental value.
- Local authorities should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

- Local authorities should deliver sufficient community and cultural facilities and services to meet local needs.

Paragraphs 7, 9, 10, 11, 14, 17, 23, 24, 26, 56, 64, 69, 70, 129, 131, 132 and 135 are considered to be most relevant to this application.

BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY

The Blackpool Local Plan: Part 1 - Core Strategy was adopted by the Council in January 2016. The policies in the Core Strategy that are most relevant to this application are:

- CS4 Retail and Other Town Centre Uses
- CS6 Green Infrastructure
- CS7 Quality of Design
- CS8 Heritage

SAVED POLICIES: BLACKPOOL LOCAL PLAN 2001-2016

The Blackpool Local Plan was adopted in June 2006. A number of policies in the Blackpool Local Plan (2006) have now been superseded by policies in the Core Strategy (these are listed in Appendix B of the Core Strategy). Other policies in the Blackpool Local Plan are saved until the Local Part 2: Site Allocations and Development Management Policies is produced.

The following policies are most relevant to this application:

- LQ1 Lifting the Quality of Development
- LQ2 Site Context
- LQ14 Extensions and Alterations
- BH3 Residential and Neighbour Amenity
- BH4 Public Health and Safety
- BH12 Retail Development and Supporting Town Centre Uses
- BH13 District Centres
- BH16 Proposed Shopping Development Outside Existing Frontages
- BH21 Protection of Community Facilities
- AS1 General Development Requirements

ASSESSMENT

Principle of retail development

In the appeal decision notice, the Inspector who determined the appeal against the refusal of planning permission reference 14/0465 stated that Layton District Centre appears to be performing well and there were no vacant units within the district centre suitable to accommodate a convenience retail unit of the type and size proposed. This remains to be the case.

The type and scale of the proposed retail element of this proposal would be commensurate with the existing District Centre of Layton which, as indicated in the Local Plan, plays a vital role in providing convenience shopping facilities for a sizeable catchment, together with a range of other services and facilities.

The District Centre extends along both sides of Westcliffe Drive. The site lies on the western side of Westcliffe Drive and although not contiguous with the existing retail frontages on this side of the road, there being a cemetery between, it is immediately opposite the existing retail frontages on the eastern side. Therefore it would not be unreasonable to conclude that it is contiguous to the existing shopping frontage as required by saved Policy BH13 of the Local Plan. In any event, the need to be contiguous is not a requirement of the National Planning Policy Framework (NPPF). The site constitutes an edge of centre site as defined in the NPPF (page 52) and is well connected to it. Therefore the retail element of the proposal would meet the sequential test (paragraph 24).

The Inspector went on to say that the Council has referred to policy BH16 of the Local Plan in its reason for refusal which relates to the development of new local shopping facilities outside existing shopping frontages. However the necessity for there to be a demonstrated need for the development with no convenient existing local shopping provision is not consistent with the NPPF and accordingly, in line with advice at paragraph 215 of the NPPF, she have given little weight to this policy in consideration of the appeal.

Paragraph 26 of the NPPF confirms that an impact assessment is not required for retail, leisure and office developments which are below 2,500 square metres if, as is the case here, there is no proportionate locally set floorspace threshold. As such the application is not required therefore to assess the impact of the retail element of the proposal on the vitality and viability of Layton District Centre.

There is nothing to suggest that the retail element of the proposal would have a negative impact on the existing range of uses in the centre or undermine its existing retail role. Moreover, it would enable linked shopping opportunities and would to some extent diversify the retail offer in Layton and provide greater consumer choice.

Taking all of the above into account, the Inspector was satisfied that the application site would be a suitable site for the retail element of the proposal having regard to policies which seek to support the vitality and viability of Layton District Centre and nearby local centres. Accordingly, it would not undermine Policy CS4 of the Blackpool Local Plan, Part 1 - Core Strategy or conflict with saved Policies BH12 and BH13 of the Local Plan.

There has been no material change in circumstances since the appeal decision to take a different view.

Reduction in the size of the community asset

The surrounding area has recently lost community assets such as the Windmill (A4 public house), The Dinmore (A4 public house), the Christ the King community centre and the Boys

and Girls Club which was located at Laycock Gate. The Layton Institute is one of the few remaining social/community buildings left in and around Layton.

Policy BH21 of the Local Plan states that proposals which would lead to the loss of, or reduction, in the size of a community facility will not be permitted unless:

- (a) the facility is appropriately replaced, or
- (b) the applicant can demonstrate that there is no longer a need for the use of the facility or its alternative use to meet other community needs.

Policy BH21 is consistent with the NPPF which indicates, at paragraph 70, that planning policies and decisions should plan positively for the provision of community facilities and guard against their unnecessary loss.

A document submitted with the application titled "Economic Argument for Change" explains the recent background of the club, including details of how the Minotaur Group saved the club from liquidation in 2012 and that declining membership has resulted in the need to down-size the club. The document however only explores the proposal to move the club to the first floor with retail on the ground floor. No consideration to retaining the club on the ground floor and finding an alternative community use or other use for the first floor is apparent in this document.

This document also states that the retail use would subsidise the first floor club use. However, no legal mechanism is in place to ensure that the retail use would cross subsidise the club in the long term, especially if the two floors were to be in separate ownership in the future.

The property is currently being marketed for sale as a whole building with no option to lease or purchase part of the building (see marketing information in Appendix 7a).

The optimum viable use of the property is to retain it as a community asset. Whilst there is no dispute that the club may not be performing as well as it once did, the viability appraisal does not adequately assess alternative uses. As the building is only currently being marketed for sale as a single entity, rather than on a variety of bases and terms, it has not been demonstrated that retail on the ground floor and moving the club to the first floor is the only viable option. The first floor, with a stage and ancillary facilities would lend itself to various community uses such as a youth club, dance school, for amateur dramatics or for hire as a private events space etc. Even if it could be demonstrated that an alternative community use could not be found for the first floor, it would still be preferable to use the first floor as offices or even residential rather than dilute the club's ground floor street presence.

Notwithstanding that the bowling green/open space at the rear of the building is not public open space, its partial development as a result of the proposal would be contrary to paragraph 74 of the NPPF. This indicates that existing open space, sport and recreational buildings and land should not be built on, unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or, the

loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

The people of Layton and across the wider town have a significant local association with the Layton Institute. Reducing its size, relegating its community use and value to the first floor and physically separating the use from the bowling green at the rear and reducing the size of the bowling green, leaving the bowling green at significant risk of becoming redundant as a community asset would reduce the social significance of the building as a heritage asset and reduce its community and amenity value.

Impact on the appearance and significance of the heritage asset (locally listed building)

Paragraph 135 of the NPPF states that in weighing applications that affect directly or indirectly non-designated heritage assets (which includes locally listed buildings), a balanced judgement will be required having regard to the scale of any harm or loss of significance of the heritage asset.

In the applicant's appeal statement for the previously refused scheme (14/0465), paragraph 11.4, it confirms that the property is a purpose built structure with a window pattern that is only suitable for a limited number of uses. This is agreed and having a retail unit at ground floor would reduce significantly the legibility of the building and its historic and social context as a community club, reducing the long term sustainability of the club.

In terms of external alterations, there are no specific concerns with installing a shopfront on the rear of the building, although passing the bin store to access the shop is not ideal nor is the fact that that it does not relate well to other retail units in the District Centre which are accessed from Westcliffe Drive.

Paragraph 73 of the NPPF indicates that high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. The National Planning Practice Guidance (NPPG) states that open space, which includes all open space of public value, can take many forms. It also indicates that it can provide health and recreation benefits to people living and working nearby, have ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting built development and an important component in the achievement of sustainable development.

The building and the bowling green are locally listed together and one of the reasons is for their group value. Although the bowling green has not been used for bowling purposes in recent years, the green is still well maintained and is used as social amenity space for the club. Given the built up nature of Blackpool, open space such as this bowling green has important recreational, sport and visual amenity benefits as well as being highly valued by the local community. The amended proposal involves providing 10 parking spaces on the northern part of the bowling green along the Granby Avenue boundary, resulting in the partial loss of the green space and removing its presence from the streetscene and detaching it visually from the main building. The bowling green makes an important contribution to the character and appearance of the Layton Institute and loss of part of the

bowling green would cause harm to the significance of the heritage asset. (This is a point that was made by the Inspector in considering the appeal to the previous proposal).

The current internally illuminated signs on the building are unauthorised and are poorly designed and scaled and obscure some decorative window detailing. Other poor quality advertising banners are also regularly displayed on the front elevation, advertising different events, sports coverage, drinks promotions etc. Introducing a retail use at the ground floor level and moving the club upstairs would create increased demand for advertising for the two separate uses and could lead to future applications to install an ATM machine, air conditioning and refrigeration equipment, perhaps roller shutters over doorways, freestanding signage and window vinyls etc., making the front elevation even more cluttered by advertisements and other features commonly associated with a convenience retail store, to the detriment of the appearance and character of the locally listed building.

There are no identified public benefits which would weigh in favour of the retail use at ground floor and the proposed alterations, given the level of harm to the heritage asset that has been identified, should the application succeed.

Highway safety

The previously refused application (reference 16/0465) proposed approximately 350 square metres of retail floorspace on the ground floor which required 15 car parking spaces. That application and dismissed appeal, would have provided eight parking spaces dedicated to the ground floor retail use and the six existing spaces would have been retained for the club use (14 spaces in total).

This application proposes approximately 420 square metres of retail floorspace and would provide 10 spaces for the retail and the existing six spaces would be for the club use. Given the proposed increase in retail floorspace compared to the previously refused application, car parking standards indicate that 22 parking spaces would be required for the retail use alone, and there is a shortfall of 12 spaces. This shortfall is significant given how congested Granby Avenue and surrounding streets are, especially at peak times.

Previously, the Inspector confirmed that eight dedicated parking spaces for the retail unit would be significantly less than the 15 spaces required by the Council's parking standards and accordingly, it would be likely to increase the demand for on-street parking within the area, particularly on the south side of Granby Avenue. Parking on the south side of Granby Avenue is currently unrestricted and is already over-subscribed, given its proximity to the District Centre and the restricted parking on Westcliffe Drive. It is not considered that an additional two spaces would override this concern, especially given the proposed increase in retail floorspace compared to the previously refused application.

Similarly, the Inspector confirmed that the existing on-street parking on Granby Avenue would restrict the forward visibility of vehicles exiting a proposed car park at the rear and that this would be likely to lead to increased opportunities for conflict between vehicles as well as between vehicles and pedestrians in what is already a somewhat congested residential street. Placing parking restrictions on the southern side of Granby Avenue would

resolve this but would further reduce on-street parking capacity and would be likely to lead to congestion within the proposed car park given its limited capacity.

The issue of parking and highway safety has not been addressed and there is no obvious solution to this problem. As such, the proposal would be contrary to policy AS1 of the Local Plan which requires new development to provide appropriate levels of car parking and safe and appropriate access to the road network.

CONCLUSION

The principle of a retail use at ground floor level is acceptable. However, given the constraints of the building described above, the Layton Institute does not lend itself physically for a retail use at ground floor level.

The proposal would cause harm in terms of highway safety and as a result of the reduction in the size of the existing community facility and the loss of the bowling green/open space and the effect of this on the appearance and significance of the heritage asset.

Paragraph 7 of the NPPF states that sustainable development must have an economic, social and environmental role. It is considered that the proposal does not satisfy the social role to provide accessible local services that reflect the community's social and cultural well-being needs or the environmental benefits in contributing to protecting and enhancing our built and historic environment.

Therefore, the recommendation is to refuse the application.

HUMAN RIGHTS ACT

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. However, these rights are qualified in that they must be set against the general interest and the protection of the rights and freedoms of others.

It is not considered that the application raises any human rights issues.

CRIME AND DISORDER ACT 1998

The contents of this report have been considered in the context of the Council's general duty, in all its functions, to have regard to community safety issues as required by section 17 of the Crime and Disorder Act 1998

BACKGROUND PAPERS

Planning Application File(s) 16/0436 which can be accessed via the link below:

<http://idoxpa.blackpool.gov.uk/online-applications/search.do?action=simple>

Recommended Decision: Refuse

Conditions and Reasons

1. The proposed development would result in the reduction and loss of a community facility and the applicant has failed to demonstrate that there is no longer a need for the facility or that the Layton Institute building and bowling green could not be adapted to provide an alternative community facility or that replacement facilities would be provided elsewhere. Whilst it may be accepted that the continued use of the club on both floors may not be viable, the applicant has failed to demonstrate why the club use cannot remain on the ground floor, retaining its street presence and direct access to the bowling green. In addition, the applicant has not demonstrated which alternative uses of the first floor have been considered and that the first floor has been marketed on this basis. As such, the proposal is considered to be contrary to Policy BH21 of the Blackpool Local Plan 2001-2016 and Part 8 of the National Planning Policy Framework.

2. The proposed development would have a detrimental impact on the appearance and group value of the non-designated heritage asset and in the streetscene given the bowling green would be detached physically and visually from the main building. In addition, the reduction in the size of the bowling green and the parking of cars along the northern part of the bowling green fronting Granby Avenue would be detrimental to visual amenity and the significance of the non-designated heritage asset. As such, the proposal is contrary to Policies CS7 and CS8 of the Blackpool Local Plan Part 1 : Core Strategy 2012-2027, Policies LQ1 and BH3 of the Blackpool Local Plan 2001-2016 and paragraphs 56 and 135 of the National Planning Policy Framework and should be refused in accordance with paragraph 64 of the National Planning Policy Framework.

3. The means of access to the proposed development would be significantly detrimental to highway safety by virtue of the inadequate width of the junction of Westcliffe Drive with Granby Avenue (which would lead to vehicle conflict and congestion) and inadequate visibility (sightlines) due to vehicles being parked on-street. Therefore the proposal would be contrary to Policy AS1 of the Blackpool Local Plan 2001 - 2016.

4. **ARTICLE 35 STATEMENT (NATIONAL PLANNING POLICY FRAMEWORK para 187)**

The Local Planning Authority has sought to secure a sustainable development that would improve the economic, social and environmental conditions of Blackpool but in this case there are considered factors which conflict with the National Planning Policy Framework and policies of the Blackpool Local Plan: Part 1 - Core Strategy and Blackpool Local Plan 2001-2016 which justify refusal.

Advice Notes to Developer

Not applicable