

New Homes from Old Places

Residential Conversion and Sub-division Supplementary Planning Document

Statement of Consultation

March 2011



1.0 Introduction

- 1.1 This document presents the outcome of consultation on previous drafts of the 'New Homes from Old Places Residential Conversion and Sub-Division Supplementary Planning Document (SPD)', produced for consultation purposes in May 2009, May 2010 and January 2011.
- 1.2 Extensive consultation has been undertaken; reflecting the complex nature of the document and the significant changes that have been made to the format and content since the first draft was produced.
- 1.3 Key issues raised during consultations are as follows:

Key Issues

- The document is too ambitious (and prescriptive) in terms of the existing architectural features to be removed
- The proposed internal space standards are too strict and will result in large houses (and flats) for which there is no market
- External amenity standards cannot be met
- The requirements are not financially viable without significant public grant aid
- The proposals as they stand could lead to a worsening of the current situation with large properties becoming popular for large vulnerable families and the creation of further unlawful Houses in Multiple Occupancy (HMO)
- Need to understand potential and possible unintended impacts on an already weak and at-risk holiday accommodation sector
- Some of the proposals set out in the SPD are not based on appropriate DPD policies

- 1.4 The key issues raised have generally been addressed in the Final SPD as follows:

Responding to issues

- Fundamental design requirements have been revised. In particular, the changes make it easier to convert an existing building into a single dwelling, which is what the Council is keen to encourage. Whilst the removal of street-facing sun-lounges is a requirement in all cases, the removal of non-original roof-lifts or inappropriate dormers is a requirement when sub-dividing a property only
- The space standards are based on those in the London Housing Design Guide 2010, and have been adjusted to allow for conversion of existing spaces. These are intended to provide quality, flexible, modern space. Internal size standards in the Final SPD have been rounded from the Draft SPD, and are slightly lower
- Private outdoor space is highly valued and should be provided where possible to provide a good quality home. The Council acknowledges that it may not be possible to create meaningful amenity areas in all cases, particularly in the

inner areas. In the Final SPD there is now an emphasis on maximising all opportunities to provide outdoor amenity space, including the removal of extensions and outbuildings and provision of roof terraces and balconies. Minimum standards relating to ground floor external amenity area and balconies / roof terrace areas have been moved to best practice guidance

- A separate architectural feasibility study has shown the guidance to be technically feasible
- Alongside the Adopted SPD, robust enforcement action is important to prevent further unlawful change of use to HMO. Surveys undertaken in the Resort Neighbourhoods have given the Council comprehensive information on existing uses and condition of buildings which will be used to closely monitor any unlawful change of use or development and the deterioration of existing building stock
- We have revisited the housing mix requirement and found it went beyond higher level planning policy, specifically Policy HN6 of the Local Plan, which is beyond the scope of any SPD. Improving the housing mix is something for the emerging Core Strategy to address. The housing mix requirements have been amended and are now consistent with Policy HN6. Should they be reviewed through the Core Strategy, the final SPD will be reviewed accordingly
- The document sets out the minimum guidance considered necessary and appropriate to ensure that high quality residential dwellings are created. It recognises that the conversion of existing buildings requires a degree of flexibility, although expects all proposals to demonstrate an innovative, high quality design solution.

2.0 Initial Consultation on Preparing the SPD

- 2.1 A pre-production draft was published in May 2009. At the time no decision had been taken as to the status of the document and whether it would be a SPD. The consultation exercise took place over a four week period between 3rd August and 31st August 2009, and was targeted at local architectural and planning agents and holiday accommodation organisations (see Appendix 1 for details). The purpose of the consultation was to obtain views on the general approach to improving design requirements for residential conversions and sub-divisions and whether the proposed design requirements were considered appropriate.
- 2.2 Four responses were received which are detailed in Appendix 1, along with the Council's response and proposed changes to the draft SPD. Whilst some of the comments welcomed the aims of the document they all had concerns with the detailed design requirements.

3.0 Consultation on Draft SPD

- 3.1 A draft SPD was published in May 2010. It was decided that the document would be a SPD and so statutory consultation procedures were followed. The consultation exercise took place over a six week period between 24th May and 5th July 2010 (this was extended until 12th July due to a suspected technical error with the Council's online consultation portal). The purpose of the consultation was to obtain views on the proposed design requirements and whether the revised layout was easier to understand.

3.2 Consultation involved the following:

- Presentation to the Fylde Coast Planning Agents Meeting on 27th April 2010
- Publication of the Statement of Matters in the Blackpool Gazette on 24th May 2010
- Dedicated consultation event on the Council's online consultation portal
- Emails sent to all consultees on the Local Development Framework Database on 24th May 2010, and reminders sent on 29th June 2010.
- Letters sent to planning agents and LDF database consultees with no email address
- Publishing the draft SPD and supporting documents (including notice of the SPD Matters) on the Council's website (www.blackpool.gov.uk/residentialconversions) and depositing them at the locations below:
 1. Main reception Municipal Buildings, Corporation Street, Blackpool, FY1 1LZ2.
 2. Blackpool Central Library, Queen Street, Blackpool, FY1 1PX
 3. Anchorsholme Library, Luton Road, FY5 3RS
 4. Bispham Library, Devonshire Road, FY2 0HH
 5. Boundary Library, Bathurst Avenue, FY3 7RW
 6. Layton Library, Talbot Road, FY3 7BD
 7. Mereside Library, 4b Crummock Place, FY4 4TP
 8. Palatine Library, St Annes Road, FY4 2AP
 9. Revoe Library, Revoe Street, FY1 5HN
 10. Blackpool Enterprise Centre, Lytham Road, FY4 1EW
 11. Solaris Centre, New South Promenade, FY4 1RW
- The document was also a key part of a series of six major public exhibitions arranged as part of a parallel consultation exercise on the Holiday Areas Draft SPD

3.3 Seven representations were received which are detailed in Appendix 2 along with the Council's response and proposed changes to the revised draft SPD as appropriate.

3.4 An email was sent to 4NW on the 24th May requesting confirmation that the SPD conforms to policies in the North West Regional Spatial Strategy (RSS). However, a letter issued from Communities and Local Government (CLG) on the 6th July 2010 regarding the revocation of regional strategies meant there was no obligation to check conformity with RSS at this stage. This was confirmed by 4NW in an email to Blackpool Council.

4.0 Consultation on Revised Draft SPD

- 4.1 A revised draft SPD was published in January 2011. The consultation exercise took place over a four week period between 17th January and 14th February 2011. The document had been radically re-structured and re-written to address respondents concerns and the main purpose of this exercise was to obtain views on the proposed design requirements and the introduction of best practice guidance, and hopefully achieve 'buy-in' to the document from planning agents in particular.
- 4.2 Consultation involved the following:
- Publication of the Statement of Matters in the Blackpool Gazette on the 17th January 2011
 - A dedicated consultation event on the Council's online consultation portal
 - Emails sent to all relevant statutory and non-statutory consultees, including all local planning agents, and reminders sent in early February 2011.
 - Letters sent to planning agents and other consultees with no email address
 - Publishing the draft SPD and supporting documents (including notice of the SPD Matters) on the Council's website (www.blackpool.gov.uk/residentialconversions) and depositing them at the Customer First Reception, Municipal Buildings, Corporation Street, Blackpool, FY1 1NF
- 4.3 Five representations were received which are detailed in Appendix 3.
- 4.4 A letter from CLG dated the 10th November 2010 confirmed the re-establishment of regional strategies (although it remains the Government's intention to revoke these in the emerging Localism Bill). Due to regional body resources, local planning authorities are asked to reach their own view on whether an emerging Plan is in conformity with RSS. Blackpool Council's view is that 'New Homes from Old Places Residential Conversion and Sub-Division SPD' is in conformity with the North-West RSS, and this is summarised in Appendix 4.

Appendix 1: Initial Consultation on Preparing the SPD (May 2009)

List of Consultees

Name / Organisation	Name / Organisation
Alan Jones Chartered Surveyors	Information Monitoring Officer Blackpool Council
Architectural Design Services	Julie Cary Planning
BAGS	Kensington Developments
Baxter Homes Ltd	Keystone Design Associates
Bill Atkinson	Leo Morgan
Bispham Hotel & Traders Association	Mackeith Dickinson & Partners
Blackpool Hotel and Guest House Consortium	Maple Timber Frame
Blackpool Self-Catering Association	Mellor Architects
Bromley Parker Architects	Midgely Drawing Service
CABE	Mr D Turnbull
Cassidy & Ashton	Mr G Attwater
CFM Consultants	Mr R Ansell
Chris Hewitt Architect	Mr R Hopper
Croft Goode Partnership	Mr S Lomax
D Turnbull	Ms Melanie Lawrenson
Deputy Director of Housing Regeneration, Re-Blackpool	NTJ Design
Firth Associates Ltd	Partnership Delivery Officer Blackpool Council
Fletcher Smith Architects	Planning & Design Services Ltd
Fylde Architects and Surveyors	Plantasia
Fylde Coast Housing Strategy Manager Blackpool Council	PT Design
Gerald Senior	Roy Bancroft
Government Office North West	Thompson Developments
Graham Anthony Consultants	Turner Builders Ltd
Head of Business and Visitor Economy Strategy, Blackpool Council	Wilkinson Developments Ltd
Home Plan Design	Yes Hotels
Ian Standidge	

List of Respondents

Name / Organisation	Name / Organisation
Mr C Plenderleith	Leith Planning Ltd
Mr S Lomax-Dwent	Owner of holiday accommodation in Blackpool
David Hadwin	Keystone Design Associates Ltd
Mr R Dagwell	Blackpool Hotel & Guest House Consortium

Schedule of Comments and Reponses

Consultee	Comment Summary	Council Response	Change to Draft SPD
Leith Planning Ltd on behalf of Hay Hill Ltd	While it is not stated in the document it is assumed that the 'revision' is to the Supplementary Planning Guidance (SPG) Note 10 dated June 1999 entitled 'Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats'.	This is correct. It is acknowledged that the text in the introduction does not explain this clearly.	The Draft SPD clearly explains that the document will replace existing SPG Note 10.
	It is understood that the replacement for SPG Note 10 is a Supplementary Planning Document (SPD) providing amplification in relation to Local Plan Policy RR9 as reproduced at Appendix 4. However, this is not clearly explained which undermines the integrity of the document.	At the time the pre-production draft was consulted on, no decision had been taken as to the status of the document; it was produced to seek comments from informed agents on potential new guidance for residential conversions.	It has been agreed that the status of the document will be a SPD and this is explained in the Draft SPD. The SPD supports saved policies RR9, HN5, HN6 and replacement policies in the emerging Core Strategy and these are clearly stated in the Draft.
	Not satisfied that the SPD meets the requirements of <i>section 19 of the Planning and Compulsory Purchase Act 2004</i> ; in particular the Council has not given sufficient regard to: (a) National policies and advice contained in guidance issued by the Secretary of State. The document needs to be tested against Paragraph 5 and 23 of PPS1; in particular the SPD will undermine sustainable economic development by imposing standards which seriously undermine viability. (b) Any other local development document which has been adopted by the authority. One of the concerns is that the document goes well beyond the scope of Local Plan Policy RR9 and is overly prescriptive. The SPD is not clearly cross-referenced to the relevant development plan document policy which it supplements. (c) The document will seriously undermine the viability of development proposals, such as that for the Verona Hotel (Tyldesley Road). (d) The resources likely to be available for implementing the proposals in the document. One of the concerns is that to achieve the aspirations laid out in the Foxhall Action Area Plan the council must rely on private sector investment.	The initial draft was not produced as a SPD; compliance with statutory requirements is not applicable. The guidance aims to create good quality converted new homes in accordance with PPS1 and respond to national, regional & local planning policies as appropriate. It is acknowledged the draft SPD must be compliant with Policy RR9, HN5 and HN6 of the Local Plan, which require proposals to establish residential character and comply with the Council's floorspace, amenity standards and housing mix. The SPD is not being prepared to address a specific development proposal although the Council acknowledges a study is necessary to consider technical feasibility. This comment relates to the Foxhall AAP and not to this SPD.	The statutory requirements have been followed when preparing the Draft SPD. The draft provides design requirements which will support creating good quality new homes through conversion. The design requirements in the draft SPD complement existing local plan policies; which are referenced in the appendix. The draft does include a number of changes e.g. to external amenity space; subdivision thresholds have been reduced and more flexibility is introduced. Some of the requirements have been relaxed, for example the removal of roof lifts for conversions N/A
	<i>The Town & Country Planning (Local Development) (England) Regulations 2004</i> define a "SPD" as "a LDD which is not a DPD, but does not include the local planning authority's statement of		

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	<p>community involvement". This draws attention to the following:</p> <p>(a) Regulation 13(1): the LDD must contain a reasoned justification of the policies contained in it</p> <p>(b) Regulation 13(5): where a DPD contains a policy that is intended to supersede another policy, it must state that fact and identify the succeeded policy. It is assumed that the 'revision' is to the SPG Note 10 dated June 1999 entitled 'Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats'</p> <p>(c) Regulation 13(8): the policy in an SPD must be in conformity with: (a) policies in the core strategy (b) policies in any other DPD, or (c) if neither paragraph (a) nor (b) applies, an old policy</p> <p>(d) Part 5 introduces minimum procedural requirements for the adoption of SPD's, including publicity, and providing an opportunity for making representations. There are a number of subheadings and the following are of particular reference:</p> <ul style="list-style-type: none"> ▪ application interpretation of Part 5 ▪ public participation ▪ representations on SPDs ▪ adoption of SPDs <p>(e) Regulation 19: Adoption of SPDs lists the steps to be taken by the local planning authority once the SPD has been adopted. This includes sending the adoption statement to any person who has asked to be notified of the adoption of the document. Leith Planning wishes to be notified</p>	<p>Agreed. This will be set out in the Draft SPD and further versions.</p> <p>Agreed. This will be acknowledged in the Draft SPD and any subsequent versions.</p> <p>Agreed. The emerging Core Strategy will be acknowledged in the Draft SPD.</p> <p>At the time of this consultation no decision on the status of the document had been made. Now that it is confirmed the document will be an SPD all appropriate procedures will be followed.</p> <p>Noted</p>	<p>A brief justification accompanies each set of design requirements</p> <p>The draft now states that the SPD will replace the existing SPG10.</p> <p>The Draft SPD is considered to be in conformity with "saved" Local Plan Policies HN5, RR9, HN6 and emerging Core Strategy policies.</p> <p>The statutory requirements have been followed when preparing the Draft SPD, including publicity and opportunity to make representations.</p> <p>A statement of matters will be published when formal consultation on the draft SPD begins, allowing respondents to request to be notified of the adoption of the SPD.</p>
	<p>Para 6.1 of PPS 12: Local Spatial Planning notes that a SPD may be prepared to provide greater detail of the policies in its DPDs. The document goes well beyond the scope of Local Plan Policy RR9 and is overly prescriptive. PPS12 goes onto state that SPDs should not be prepared with the aim of avoiding the need for the examination of policy which should be examined. The preclusion of 1-bed accommodation and setting out living space standards as stipulated at Table 1 (which includes minimum total dwelling sizes of 67sq.m. for a 2 bed flat) would seriously undermine viability of redevelopment schemes. If the Council intend to rely on the policy framework it should be subject to the rigorous assessment associated with a DPD.</p>	<p>Proposals involving sub-division and/or change of use to permanent residential accommodation must comply with Council floorspace and amenity standards (Policies RR9 and HN5). Supporting text to Policy HN5 states proposals will need to accord with Policy HN6 (housing mix) and with the Council's SPG for residential conversions and sub-divisions. The new SPD will update the current SPG referred to.</p>	<p>N/A</p>

Consultee	Comment Summary	Council Response	Change to Draft SPD
Rob Newman	<p><i>Floor space standards:</i> Minimum gross floor area of a 2 bedroom flat to be 67sqm but total minimum floor space sizes for individual rooms is 47sqm. Where does the other 20sqm fit in? And why could a 200sqm guest house not be sub-divided into 2 or 3 two bedroom units?</p>	<p>The additional 20sqm is taken up by ancillary spaces such as bathrooms and circulation space. The 200spm threshold will be revisited.</p>	<p>The 200spm threshold below which subdivision will not be permitted has been reduced to 156sqm; between 156 and 191 sqm subdivision is limited to two dwellings (maximum).</p>
	<p><i>External amenity provision:</i> The majority of 200sqm plus guest houses could not provide the amenity area standards for garden, parking and bin storage required, therefore, does this mean that some of the larger ones would not be able to be sub-divided?</p>	<p>The document is draft and has been published for comment. Consideration will be given as to whether the external amenity provision required is achievable</p>	<p>The minimum external amenity area per dwelling has been reduced to reflect number of occupiers and minimum dimensions are omitted</p>
	<p><i>Amenity:</i> In some cases due to the density of the buildings and limited external space, the external amenity requirements could not be achieved even for 1 dwelling.</p>	<p>Consideration will be given as to whether amenity requirements are achievable.</p>	<p>External amenity standards have generally been reduced.</p>
	<p><i>Large Single dwellings:</i> Should this be the case, would there not be a predominance of very large single dwellings which would be attractive to the Housing Associations for very large families, possibly causing some of the social problems trying to be addressed in this document?</p>	<p>One of the aims of the document is to encourage a more sustainable mix of housing types and tenures as current supply is skewed in favour of small, privately rented flats.</p>	<p>To create more realistic family sized homes, the threshold below which properties can be sub-divided into single dwellings has been reduced.</p>
	<p><i>Investment:</i> Investment in any of these properties by a potential developer is disproportionate to any return made by a single dwelling, especially when you consider the cost of removing roof lifts and reinstating original roof lines etc. This will stagnate the existing guest house market.</p>	<p>The document must balance raising accommodation standards whilst considering viability. Removal of non-original additions is important to establish residential character and amenity. Consideration will be given as to whether the standards are realistic to achieve.</p>	<p>The Draft SPD now states that the removal of roof lifts is only a requirement when sub-dividing a property into flats.</p>
David Hadwin, Keystone Design Associates Ltd	<p>The existing policy is working fine and understood by all parties. It is robust and has been supported in appeal. Why the wholesale change in the policy? It is to be applauded that the planning section is now echoing the mood and policy of the general council i.e. acknowledgement that the guest house industry of Blackpool is in serious decline.</p>	<p>Housing choice is limited to small, poor quality privately rented bedsits and flats or shared houses in multiple occupancy (HMO) causing problems with overcrowding, lack of amenity space, noise and inconvenient or unsafe access. This document will manage the change of use from holiday accommodation to residential, and aim to raise the quality of residential conversions and subdivisions and address the over-supply of poor quality flats</p>	<p>N/A</p>

Consultee	Comment Summary	Council Response	Change to Draft SPD
	Local plan policy will need to be changed to reflect the aspirations of this document (RR9 in particular).	It is acknowledged the draft SPD must be compliant with Policy RR9, HN5 and HN6	N/A
	Would be useful to know which areas are being considered as holiday resort areas. Need to look at the general condition of stock in the areas. In the Foxhall (Preferred Option) consultation document one of the areas proposed for retention is Coop Street, but all the properties in this area are of low structural condition. In these areas conservation seems pointless, when replacement with alternative uses would be far better.	The holiday resort areas will be developed through the Core Strategy and a Holiday Accommodation SPD and these will be consulted on separately.	N/A
	The use of floor areas to assess the suitability for conversion is flawed. The measurement is subjective. The 200sqm minimum floor area conflicts with the size of flat suggested. A two bedroom flat has a floor area requirement of 67sqm. If this figure is used it is possible to convert the 200sqm building into 3no flats. A 200sqm building would provide a very large family dwelling, which is not a desirable product.	Noted. The proposed floor area thresholds and standards will be revisited.	To create more realistic family sized homes, the threshold below which properties can be sub-divided has been reduced.
	No consideration has gone into economics of conversion. The council must recognise that all these buildings are commercial, so they must work financially. If they do not, the owner goes bankrupt, and the property becomes vacant and falls into disrepair. The majority of the hotel stock in Blackpool is currently up for sale. Market forces will determine what conversion is viable and will result in mixed development that is desired.	The document must balance raising accommodation standards whilst considering viability. The Council acknowledges a study is necessary to consider technical feasibility.	Some of the requirements have been relaxed, for example the removal of roof lifts for conversions.
	Step 2: Why is only 50% of roof space included in the assessed floor area of the (original) building?	The 50% roof space assessment was an attempt to bring the measurable roof space in line with the original roof area. This will be reconsidered.	This has been replaced with a requirement that any space with a floor to ceiling height of less than 2.2m cannot be included in the floor area of the original property.
	Step 4.1 states single bedroom dwellings are not permitted in guest house conversions. This conflicts with council policy which allows 33%.	This looks to address problematic small flats but it is acknowledged the SPD cannot go beyond existing policy so this will be revisited.	The Draft SPD is now consistent with policy and states the maximum proportion of one bedroom dwellings in any development is 1 in 4.
	Step 4.4 prohibits the conversion of basements. Why? These can be used for plant rooms or habitable space providing adequate amenities, and could be part of a maisonette. This requirement should be dropped.	This looks to reduce opportunities for lower quality conversions with inadequate amenity, but will be revisited	This specific prohibition has been removed from the document in recognition that they can provide useful space.

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	<p>Step 4.5 requires compliance with code for sustainable homes (min level 2). There is no requirement in any legislation to register with code for sustainable homes. Indeed if you are considering energy efficiency the requirements of part L1 B are adequate. It would be impractical for a conversion to meet the requirements of the code, not least the insulation levels. Incidentally the requirement conflicts with RSL and government requirements for social housing which requires code 3 level for above. Code for sustainable homes is very much detailed design and is certified on completion of the build. How is it proposed to intermesh this into the planning process? This is unworkable and unenforceable and should be dropped.</p>	<p>This draft document starts to present opportunities for higher quality conversions with the introduction of compliance with 'Code for Sustainable Homes'. Consideration will be given as to whether this requirement is realistic.</p>	<p>The requirement for compliance with 'Code for Sustainable Homes' standards has been removed and the document now relies on the increasing requirements of Building Regulations over the life of the document to cover the performance requirements.</p>
	<p>Step 4.7 requires kitchens to have windows. This is not necessary as kitchens are secondary habitable rooms akin to bathrooms. Building Regulations do not require a window to be provided to kitchens and in many conversions it is not practical to provide one. This should be dropped.</p>	<p>A kitchen is a habitable room and good natural lighting makes them attractive spaces. However, the requirement for direct daylight will be revisited</p>	<p>The requirement for natural lighting has been removed in the Draft SPD although will need to be consistent with emerging Council guidance on HMO amenity standards.</p>
	<p>Step 4.8 requires all dwellings to comply with relevant Building Regulations, but this conflicts with the above points.</p>	<p>Potential conflicts with Building Regulations will be resolved.</p>	<p>The Draft SPD is considered to be consistent with Building Regulations</p>
	<p>The minimum sizes quoted in step 6 are excessive. A large two bedroom flat has a floor area of 60sqm. If you apply minimum room sizes given in this section it is possible to have a two bedroom flat of less than 50sqm. Similarly, applying this guide to the storage requirements of 5% would mean a dwelling of 5 bedrooms would require storage space greater than the kitchen and bathroom combined. It is suggested that the room sizes in the current guidance are retained and the minimum flat sizes not used. As with storage, this should suggest that consideration is given to appropriate levels. This section of the guide is over prescriptive. This comment also applies to minimum dimensions quoted.</p>	<p>The discrepancy between the aggregate figure for room sizes and total dwelling size is a result of leaving out circulation space and bathrooms. The statement that 5% storage figure for a 5 bed flat would be more than the kitchen and bathroom combined is incorrect. There are no specific requirements for kitchen and bathroom areas in this document but guidance available nationally would provide a far higher figure than the 6.05sqm that would result from the storage calculation.</p>	<p>Room size standards and the accommodation conversion scale have been revised, e.g. an original property greater than 191sqm can now be subdivided into 2+ dwellings. Dwelling size standards are based on English Partnership Standards and Homes and Communities Agency (HCA) standards along with research into adequate size standards for dwellings carried out for the Greater London Authority (GLA).</p>
	<p>Step 7: is completely impractical. The space requirements in town centre are unachievable. Similarly the parking space sizes conflict with other council policy and the disabled space sizes conflict with Part M of the Building Regulations. Also the bin space requirements conflict with advice given by the waste manager. Most flats utilize SITA bins.</p>	<p>External space and parking standards will be revisited.</p>	<p>The private external amenity space requirement has been reduced. Building Regulations do not cover parking standards for dwellings. The minimum waste storage area required has been omitted.</p>

Consultee	Comment Summary	Council Response	Change to Draft SPD
	Disagree with cycle storage provision. Should be 1 per flat and space of 2.0m length is excessive.	The document as consulted on required a single space per flat and was set at 2.0m minimum length to accommodate an adult size bicycle	The dimensions are unchanged. Cycle storage requirements have been set to dwelling occupancy.
	In conclusion, the proposed guide is over prescriptive, conflicts with current policies and other regulations and is impractical	The SPD should not conflict with existing policy or other regulations and this will be revisited.	Changes have been made to the document as already detailed above.
Mr Sybaris Lomax-Dwent	Step 4: A blanket ban on basement conversion is wrong. Many properties on Charnley Road and Havelock St for example have steps going down to the basement at the front, with natural daylight and are ground level at the back. These could make superb quality basement flats.	This looks to reduce opportunities for lower quality conversions with inadequate amenity, but will be revisited	This specific prohibition has been removed from the document in recognition that they can provide useful space.
	Step 5: The sentiment of the proposal is correct, but the financial implications would make many projects unviable. The cost of removing dormers and sun lounges in conjunction with a property renovation in many cases simply does not stack up. This is where the plan may fall down when seeking private investors/home owners to heavily invest in a tired building, rejuvenate it and be left with a hefty loss or negative equity.	The document must balance raising accommodation standards whilst considering viability. Removal of non-original additions is important to establish residential character and amenity. Existing policy requires removal of sun lounges. Consideration will be given as to whether the standards are realistic.	The Draft SPD now states that the removal of roof lifts is only a requirement when sub-dividing a property into flats.
	Step 7: Flexibility must be given here, we are not dealing with new builds and have to work around and to the best of what we have, so for a garden to be rejected because it is too narrow at one point is too rigid for success.	External space standards will be revisited	Minimum areas for external amenity and waste storage have been revised and minimum dimension requirements omitted.
Mr Ray Dagwell Blackpool Hotel and Guest House Consortium	The decline in visitor numbers is only one of the reasons hotels and guest houses have failed. Council policy is as much to blame for the current problems.	The emerging Core Strategy proposes to redefine holiday areas in response to the changing circumstances affecting guest houses in Blackpool.	N/A
	Permitting Travelodges has only exacerbated the situation.	Each planning application was considered on merit against existing planning policy.	N/A
	Owners try to survive by taking in anybody to pay the overheads and over the years a lack of sustained and proper enforcement has meant that areas have declined. This, coupled with a lack of investment in the buildings, has led to further decline making streets and areas a haven for HMOs.	This new guidance aims to prevent former guest-houses and similar accommodation falling into problematic small flats and HMOs by improving quality.	N/A

Consultee	Comment Summary	Council Response	Change to Draft SPD
	This lack of investment is not just the private sector but also the Council's own buildings, some of which are in the holiday areas. The Council has failed to enforce the legislation that they have available and this is unacceptable.	The Council's MIPS Team are undertaking surveys to identify poor quality property and any information relating to Council owned property is expected to be passed onto the Council's Property + Estates Team.	N/A
	The use of hotels and holiday flats for permanent residents has led to more anti social behaviour in the surrounding streets. Where permanent and visitors are in the same building this has led to further problems.	A sweep across the inner area by the Council's MIPS Team will identify unlawful uses and this information will be passed onto the Council's Enforcement Team as appropriate to investigate.	N/A
	The deregistering of hotels has been made difficult and even those that "cease trading" still take in guests.	The emerging Core Strategy proposes to redefine holiday areas and allow those guest houses outside these areas to convert to permanent residential use. This change in policy should make it easier to deregister hotels.	N/A
	A view should be taken on what you do with a 10 bed guest house. Perhaps areas should be re-designated to office areas with suitable inducements e.g. to form streets of estate agents thereby freeing up town centre areas such as Birley Street to café's etc. Hard and fast rules on holiday / residential areas are not necessary as there is no reason why a mixture of uses in the same street cannot co-exist side by side e.g. offices, residential homes and hotels. This would depend obviously on occupancy.	Within the redefined holiday areas the loss of holiday accommodation will be resisted to protect character. Meanwhile, main commercial uses should be located in existing retail centres to support their vitality and viability. Proposals for mixed use conversion outside the revised holiday areas will be considered on merit; and must protect the residential character of these areas.	N/A
	The Council's practice in putting dysfunctional families in hotel areas has led to further and ongoing antisocial behaviour. Before any policy document of this type is brought forward, an in-depth study of the social and economic fabric of the area, the amount of deprivation, and the employment prospects of the area, should be undertaken.	The Council has a good understanding of key social and economic issues in the inner areas through preparing an evidence base for Area Action Plans, and the survey work by MIPS.	N/A
	It is pointless creating more homes without job creation going side by side. Without job creation the houses will not be sold	This is beyond the scope of the document and is a matter for the Core Strategy to address.	N/A

Consultee	Comment Summary	Council Response	Change to Draft SPD
	<p>Step 1: There is no real justifiable reason why residential and hotels cannot co-exist side by side in certain areas. The main objection to that approach would be the Promenade. This must be coupled with the degree and the long term proposals for areas. If more Travelodges are given planning approval then more hotels even those on the Promenade will become empty</p>	<p>This is beyond the scope of the document although the emerging Core Strategy proposes to redefine holiday areas in response to the changing circumstances affecting guest houses in Blackpool.</p>	<p>N/A</p>
	<p>If hotels are developed at the football ground then more hotels will fail. The hotel market is already in decline with some premises being on the market for several years. The market has further declined due to the present economic climate and the downturn is probably pro rata with national failure and decline in hotel sales. Even with the redrawing of maps for designated holiday areas, if hotels are not wanted and cannot be sold, they should be automatically deregistered. If premises are converted at a later date controls will prevent it becoming a HMO.</p>	<p>This document does not cover the Council's policy on new holiday accommodation. The emerging Core Strategy and this new guidance will allow unviable guest houses located outside of the revised holiday areas to convert to good quality permanent residential use.</p>	<p>N/A</p>
	<p>Step 2: The method of measuring will depend on all extensions being removed e.g. sun lounges. Any height below 5ft on a roof lift to be excluded, not 50%. Any area outside to be excluded agreed.</p>	<p>The 50% roof space assessment was an attempt to bring the measurable roof space in line with the original roof area. This will be reconsidered.</p>	<p>This has been replaced with a requirement that any space with a floor to ceiling height of less than 2.2m cannot be included in the floor area of the original property.</p>
	<p>Step 3: Our present houses have probably the smallest floor area in Europe and larger dwellinghouses and room sizes should become the norm not the exception. The old Parker Morris standard should be used.</p>	<p>One of the key aims of the document is to encourage a shift towards larger 'family' homes and apartments.</p>	<p>Room size standards and dwelling size standards have been revised; and are based on HCA standards along with research carried out for the GLA</p>
	<p>Step 4: To control this by planning law and appeals is virtually impossible. This will only cause more illegal HMOs.</p>	<p>The requirements are intended to minimise the potential for new HMOs. Alongside this, the Council will promote robust enforcement action to tackle unlawful HMOs as part of a coordinated approach.</p>	<p>N/A</p>
	<p>Step 5: The removal of the sun lounge is not necessary. Signs and awnings to be removed – agree; roof lifts to be removed – disagree. Replacing extensions with gardens will depend on each building. A feasibility study on the cost of carrying out these works is required. This is a blanket policy which is impractical to enforce on. As this document unfolds and if this becomes the firm policy it will create planning blight, the destruction of the sale of hotels and more illegal HMOs to which the Council cannot and has not controlled in the past.</p>	<p>The document must balance raising accommodation standards whilst considering viability. Removal of non-original additions is important to establish residential character and amenity. Existing policy requires removal of sun lounges. Consideration will be given as to whether the standards are realistic.</p>	<p>The Draft SPD now states that the removal of roof lifts is only a requirement when sub-dividing a property into flats.</p>

Consultee	Comment Summary	Council Response	Change to Draft SPD
	Step 6: We have the smallest dwellings and room size in Europe and therefore have no objections on dwelling size and room size	One of the key aims of the document is to encourage a shift towards larger ‘family’ homes and apartments.	Room size standards and dwelling size standards have been revised; and are based on HCA standards along with research carried out for the GLA
	Step 7: The external space requirement is impractical. Hotels are bounded by back access roads making it almost impossible to park cars let alone rubbish bins and bike parks.	External space standards will be revisited	Minimum areas for external amenity and waste storage have been revised and minimum dimension requirements omitted.
	General Comments: The purpose in theory is to give guidance on the change of use of Hotels / Guest Houses to residential housing. In practice it will destroy the housing market and cause planning blight. What price will these hotels change hands for when so much is required e.g. the removal of roof lifts, extensions (outriggers). No cost analysis has been carried out. Who will pay the price for converted houses?	The document must balance raising accommodation standards whilst considering viability. A technical feasibility assessment will be considered to ascertain whether the standards are realistic.	Many of the requirements have been relaxed, for example the removal of roof lifts for conversions
	To enable this to go ahead 100% grants would be required not 70% but 100%.	Public grants are not proposed to implement the requirements. See above comment on viability.	The Draft SPD has been revised to provide greater flexibility and guest house owners looking to convert to permanent residential use will have fewer requirements to meet.
	Who would want to live in a house next to a hotel or vice versa? Although a street mix of residential, hotels & offices should create no problem. Hotels that are in desperate straits will look at this and then take in residents on a long term basis (HMO), just to survive.	Outside the proposed holiday areas the Council will continue to support quality holiday accommodation. The Council’s MIPS Team will continue to enforce unlawful HMOs and poor housing standards. The Council’s Reassurance Plus Team will continue to address problems of anti social behaviour.	N/A
	How is the Council going to enforce this document? Complaints have been made for 2 years against some premises and the situation has not changed or improved	The Council has established a robust enforcement team to address unlawful HMOs	Potential enforcement action by the Council is now referred to.
	This document is a typical planning dream like many other dreams for Blackpool.	This document must be viewed as part of the Council’s comprehensive strategy to address the declining holiday accommodation sector and poor quality rented housing sector.	N/A

Consultee	Comment Summary	Council Response	Change to Draft SPD
	The Council needs to start with the licensing of Hotels and Guest Houses with the formation of byelaws to enforce and drive out all sub-standard units.	This is beyond the scope of the SPD	N/A
	A working party should be set up under a forum so that standards can be set and proper enforcement action taken.	This is beyond the scope of the SPD	N/A
	To enable these units then to be sold on the open market at realistic prices then jobs must be found employment increase with the attraction of industry to the area.	This is beyond the scope of the SPD	N/A
	Blackpool at the moment especially in bedsit land is full of drunks etc with anti social behaviour being the norm. Is the change from hotels to housing the only way forward?	This document must be viewed as part of a comprehensive strategy to tackle problems in the inner area.	N/A
	<p>The methods are impractical and the following need to be answered:</p> <ul style="list-style-type: none"> ▪ How is this document going to be enforced? ▪ How has the cost analysis been undertaken? ▪ Impact analysis on the housing markets? ▪ Who are the prospective purchasers of the converted properties? ▪ Are we talking of the Council purchasing all hotels and providing social housing? ▪ What is the demand for flats in Blackpool? Where are the statistics to show the demand and the potential demand with population spread? ▪ What grants will be available for the conversion? 	<ul style="list-style-type: none"> ▪ The document will be enforced by the Council's Enforcement Team ▪ The Council acknowledges a study is necessary to consider technical feasibility. ▪ The document, together with other policies and interventions will assist in establishing a higher quality residential offer in Blackpool's inner areas. ▪ A recent Council study found there is demand for a new residential offer in Blackpool's inner area, subject to improvements in environmental quality. ▪ No, it is not sustainable for the Council to purchase all hotels and provide social housing; instead it is intended there will be a more balanced residential market with higher level owner occupancy, and more, larger family homes ▪ One of the aims of the SPD is to reduce the number of small poor quality flats, particularly in the inner area. ▪ There are no proposals to offer grants for residential conversions. 	Potential enforcement action by the Council is now referred to.

Consultee	Comment Summary	Council Response	Change to Draft SPD
	The Council has failed the holiday areas with its lack of action. Section 215 of The Town & Country Planning Act 1990 is hardly used. HMOs are all over the place. The multi party inspection team has not solved the problem. A long term strategic document with enforcement powers to include S215 needs to be drawn up.	This document must be viewed as part of a comprehensive strategy by the Council to tackle problems within the inner area	N/A
	Overall this is a badly thought out document and needs to be completely rewritten.	It is not accepted that the document is badly thought out; but it is acknowledged that the approach and structure could be made simpler to follow, and the design requirements less onerous.	The document has been rewritten as a formal SPD with distinct design statements which are intended to clarify and justify the policy and design standards required

Appendix 2: Consultation on Draft SPD (May 2010)

List of Consultees (individuals / organisations on the Council's LDF Database)

Appropriate Statutory Consultees	Appropriate General Consultees	Appropriate General Consultees
Government Office North West 4NW Lancashire County Council Fylde Borough Council Wyre Borough Council Preston City Council St Anne's Parish Council Westby with Plumpton's Parish Council Staining Parish Council Lancashire Constabulary Lancashire Police Authority The Coal Authority Environment Agency English Heritage Natural England Highways Agency Network Rail Department For Transport NW Regional Development Agency Electricity North-West BT Group Plc Mono Consultants Limited O2 Orange T-Mobile Vodafone Mobile Operators Association Blackpool PCT North Lancashire PCT Blackpool, Fylde & Wyre NHS Trust Strategic Health Authority (North West) National Grid Land & Development British Gas Properties United Utilities Homes and Communities Agency	<u>Elected Representatives</u> MP for Blackpool North South Blackpool MP Blackpool Elected Councillors <u>Voluntary Bodies</u> Council for Voluntary Service Barnardos Blackpool Project <u>Different Religious Groups</u> Faith Forum Blackpool Congregation of Jehovah's Witnesses <u>Bodies Representing Disabled People</u> Blackpool, Fylde + Wyre Society for the Blind Motor Neurone Equalities Forum Leonard Cheshire North West Region <u>People Carrying on Business</u> Business Link Lancashire Federation of Small Businesses Lancashire Economic Partnership Blackpool, Fylde + Wyre Trades Union Council North + Western Lancashire Chamber of Commerce The Mersey Partnership Blackpool BID Town Centre Manager Dale Street Market Manager Blackpool Self-Catering Association StayBlackpool Lancashire and Blackpool Tourist Board <u>Youth Groups, Schools, Colleges</u> Blackpool Young People's Council + Blackpool Voice Blackpool + Fylde College Blackpool Sixth Form College Revoe Community Primary School Community Futures	Blackpool Friends of Kingscote Park Blackpool + Fylde Rail Users Association Blackpool Youth Service 1 st Norbreck Scout Group <u>Conservation, Preservation and Amenity</u> Civic Trust Regeneration Unit CPRE Lancashire Branch Council for the Protection of Rural England Lancashire Wildlife Trust RSPB National Playing Fields Association Sustainability North West Theatres Trust The Woodland Trust Conservation Officer Lancashire Wildlife Trust Fylde Bird Club Blackpool Environmental Action Team (BEAT) Victorian Society Blackpool Civic Trust <u>Transport</u> Blackpool Transport Services Ltd Railtrack Property Confederation of Passenger Transport Northern Rail Stagecoach National Express Better Transport Tan-zo-go <u>Older Person Groups</u> Senior Voice Forum <u>Housing / Design Interest Groups</u> CABE Places for People Living Streets

Appropriate General Consultees	Appropriate General Consultees	Appropriate General Consultees
<p><u>Local Residents Associations</u> Foxhall Village Regeneration Association Revoe Area Forum Layton Area Forum Alexandra Road West Community Group</p> <p><u>Local Businesses / Business Groups</u> Blackpool Football Club Job Centre Plus Blackpool South Blackpool Airport Evening Gazette Fylde Coast Economic Development Company Martin Yates Independent Living Services Blackpool Pleasure Beach Leisure Parcs Progress Recruitment RealTimeUK North Beneast Training Ltd King Street Dental Surgery In the Pink Leisure CL Edwards & Sons Ltd C Cabs Moorland Motors Ltd Bestplate Ltd Chelsom Ltd Gilberts (Blackpool) Ltd Advice Link Bispham Hotel & Traders Association Blackpool Holiday Trades Association Blackpool Hotel and Guest House Consortium BAGS Hounds Hill Shopping Centre Jackson Coaches Pool Leisure Silcock Leisure Topaz</p>	<p>Midgley Drawing Service Coliseum Trade Association Reads Avenue Cluster Group Read's Grill Blackpool Indian Taj Cosmo Finnegan's Tea Room Full Monty Kebab Hut National Tyres & Autocare Salt & Vinegar South Shore Market St Mary's Pharmacy Tattoo Station Peggys Panty The Pound Shop Viking Laundrette Woodheads Cafe Limited</p> <p><u>Other National / Regional Organisations</u> Civil Aviation Authority General Aviation Awareness Council Sport England Jobcentre Plus Sustrans English Partnerships Manager GASP UK Campaign for Real Ale (CAMRA) Lancashire Fire & Rescue Service HQ Tesco Royal Mail Group Plc Department For Constitutional Affairs Public Sector Manager Ubiquis Relate Lancashire Lawn Tennis Association Regenda Group Equality and Human Rights Commission</p>	<p><u>Planning Agents</u> Development Planning Partnership How Planning LLP Strutt & Parker Dev Plan UK Carpenter Bidwells Planning Paul Butler Associates Stewart Ross Associates Jones Lang LaSalle Nathaniel Lichfield & Partners MPSL Planning & Design Ltd JWPC Ltd GVA Grimley Chris Thomas Ltd, Outdoor Advertising Consultants JMP Consulting RPS Planning King Sturge LLP Halcrow Group Ltd Malcolm Judd & Partners Higham & Co RPS DePol Associates Ltd Cliff Walsingham & Company Cass Associates Nathaniel Lichfield and Partners Peacock & Smith Consultants Mosaic Town Planning Indigo Planning HOW Planning LLP Taylor Young Development & Residential Consulting Atisreal Lambert Smith Hampton Steven Abbott Associates Keystone Design Associates Design Technology Signs Midgley Drawing Service</p>

Appropriate General Consultees	Appropriate General Consultees	Appropriate General Consultees
<p>Croft Goode Partnership Leith Planning PPS Planning Turley Associates Fusion Online Ltd Ampgroup Ltd Taylor Young David Wilson Homes Adams Holmes Associates Cassidy and Ashton Firth Associates Ltd Graham Anthony Consultants Home Plan Designs Julie Cary Planning Planning & Design Services Ltd Mackeith Dickinson & Partners NTJ Design</p> <p><u>House Builders / Construction</u> Woodford Land Morris Homes (North) Limited McDermott Developments Home Builders Federation David McLean Homes Ltd Kensington Developments Langtree Homes Ltd Bellway Homes Modus Developments Ltd Elite Homes Group Ltd Co-operative Group Ltd, Property Division ING Real Estate Investment Management R.P. Tyson Construction Ltd Newfield Construction Ltd Enterprise PLC Taylor Wimpey UK Ltd F Parkinson Ltd Galliford Try</p> <p><u>Surveyors</u> Alan Jones Chartered Surveyors Bentley Higgs</p>	<p><u>Land & Property</u> Colliers CRE Kays Commercial Estate Agents Berwin Leighton Paisner (BLP Law) Kenrick & Co Broomheads James Brearley & Sons Ltd FPD Savills Brunswick Property Co Ltd Jones Lang LaSalle Countryside Properties Allitt Estate Agents Dpplp Drivers Jonas Deloitte Greenbank Partnerships Muse Kenrick and Co</p> <p><u>Housing and Landlord Associations</u> Bay Housing Association Windmill Housing Association Wyre Housing Association Manchester Unity Housing Association Blackpool Coastal Housing Bostonway Residents & Tenants Association Great Places Housing Association Fylde Coast Landlords Association North West Housing Forum</p> <p><u>Holiday Accommodation Providers</u> Abbey Hotel Adelphi Hotel Aindale Hotel Alex Holiday Flats Alexandra Holiday Flats Alexandra Hotel Appleton Lodge Arcadian Hotel Arendale Hotel Argyll Hotel Arncliffe Hotel Cressington Hotel</p>	<p>Arundel Hotel Ascot Hotel Ash Lea Hotel Ashley Victoria Astoria Hotel Astorina Hotel Athena Hotel Athol Hotel Avalon Hotel Avenue Hotel Avoca Guest House Avonlea Hotel Ayrton House Balmoral Guest House Balmoral House Bank House Hotel Barry Holiday Flats Beach Holiday Flats Beach Mount Hotel Beach View Holiday Flats Beachside Holiday Flats Beckwood Hotel Bella Vista Hotel Belverdere Hotel Berkswell Apartments Berkswell Hotel Beverley Guest House Beverley House Hotel Bing-Lea Blenheim Hotel Bond Hotel Bonnie Brae Guest House Bourne House Hotel Bradbury Hotel Bramleigh Hotel Branston Lodge Brecks Brene Hotel Goldon Palace Gr8 Escape Hotel Grampion House Gramsford Hotel</p>

Appropriate General Consultees	Appropriate General Consultees	Appropriate General Consultees
Briardene Hotel Bridle Lodge Flats Bronte House Hotel Brooklyn Guest House Brooklyn Hotel Broomcroft Hotel Burbage Holiday Group Burleigh House Bute Holiday Flats Butlers Camelot Hotel Camelot House Canberra Hotel Care Free Hotel Castleon Villa Cavendish Hotel Century Hotel Cerena Hotel Chadsley Hotel Chaseley Chaucer House Chelston Hotel Cherry Blossom Hotel Chimes Hotel Claremont House Hotel Clarron House Cleveland Court Holiday Apartments Cleveland Hotel Cliff Haven Hotel Coach House Hotel Collingwood Hotel Colyndene Hotel Coniston Hotel Coopers Lodge Coves Hotel Cowley Hotel Craig-Y-Don Hotel Cranstore Guest House Credlands Holiday Flats Cresta Hotel Crystal Lodge Holiday Apartments Cumberland Hotel	Dalemoor Dalmeny Hotel Danescourt Hotel Daren Guest House Denmar Hotel Derwent Hotel Devon House Guest House Dewsbury House Holiday Flats Dickson Hotel Dixon Hotel Doric House Hotel Draytonian Hotel Duckies Dudley Hotel Dunera Hotel Dunroun Guest House Dutchman Hotel Edenfield Guest House Ellan Vannin Hotel Emmerdale Guest House Etherington Flats Ewdene Hotel Fairhaven Hotel Falcon Hotel Fauld House Guest House Ferndale Holiday Flats Fiesta Hotel Four Seasons Gladwyn Holiday Flats Glen Stuart Hotel Glenburn Guest House Glenheath Hotel Glenholme Hotel Glenmere Glenwalden Hotel Granby Lodge Grand Villa Guest House Grandville Hotel Grasmere Hotel Grays Hotel Greenbank Holiday Flats Gresford Hotel	Grosvenor Hotel Guyz Hotel Gynn House Hotel Habberly House Hotel Haldene Guest House Harts Head Hotel Hatton Hotel Haven Hotel Hazeldeve Private Hotel Hazelwood Guest House Highbury Hotel Hilbre Hotel Hilton Hotel Holiday Hotel Hollingdales Hotel Holmed Hotel Holmlea Hotel Holm-Lea Hotel Holmsdale Hotel Holmside House Homecliffe Hotel Hotel Bianca Hotel Libra Hotel Maxine Hotel Picasso Hotel Pierre Hotel Rossi Hotel Wilmar Hurstmere Hotel Ivydene Holiday Flats Jade Apartments Jesmond Hotel Katrina Hotel Keighley House Kenbry Guest House Kimberley King Edward Hotel Kings Court Hotel Kingsway House Guest House Kirkview Guest House Lanayr Hotel Langley House Hotel

Appropriate General Consultees	Appropriate General Consultees	Appropriate General Consultees
Langroyd Hotel Lawnswood Holiday Flats Lawrence House Le Papillon Leatham Park Hotel Leecliff Hotel Lenbrook Hotel Lexham Hotel Lindisfarne Lindsey Hotel Llanryan Guest House Lonsdale Hotel Lords & Ladies Hotel Lords Guest House Lower Flat Lynam Hotel Lynbar Hotel Lyndale Holiday Flats Lyndene Hotel Lyndhurst Hotel Lynhurst Hotel Lynmore Guest House Lynwood Guest House Mackintosh Hotel Madi Gras Hotel Manhattan Hotel Manor House Hotel Manuela Rose Maple Timber Frame Mardi Gras Hotel Mardonia Hotel Margarets Private Hotel Marinne Hotel Marlow Lodge Marsland Hotel Martells Hotel May Dene Hotel Mayfair Hotel Meland Melrose Hotel Memphis Hotel Merginn Hotel	Miramar Holiday Flats Misterton Guest House Monterey Guest House Morada Hotel Moray House Hotel Mornington Hotel Morrisey Hotel Nevele Hotel New Ashwood Holiday Apartments New Brackens Hotel New Hampshire Hotel New Oak Lea New Phildene Hotel New Promenade Hotel New Southdown Holiday Flats Newburn Hotel Northdene Hotel Northfield Hotel Northmount Hotel Norwood Hotel Norwyn Court Flats Nova Holiday Flats Number One Hotel Oak House Oakleigh Guest House Oaklyn Hotel Oakville Flats Oakwell Hotel Ocean View Holiday Flats Oregon Guest House Orlando Guest House Osborne House Hotel Park Villa Hotel Pembroke Hotel Phillips Apartments Pierremont Guest House Pierview Hotel Pilatus Hotel Pinelodge Hotel Polonez Hotel Ponderosa Guest House Ponto Nova	Porto Nova Holiday Flats Pound City Princess Hotel Priors Court Queen Victoria Hotel Red Rose Red Rose Holiday Flats Renton House Rhyl Hotel Rigby Hotel Rio-Rita Hotel Rocklea Hotel Ronda Hotel Rossall House Rosdene House Rothwell Hotel Royal Beach Hotel Royal Park Hotel Royal Windsor Hotel Rugby`S Hotel Sailyn San Diego Guest House Sancta Maria Holiday Flats Sandalwood Sandalwood Holiday Flats Sandhurst Hotel Sandpiper Hotel Sandridge Sandringham Court Hotel Sands Hotel Scotts Guest House Sea Breeze Guest House Seabreeze Seaclose Hotel Seacroft Suites Seagulls Nest Seaview Hotel Seaway Hotel Second Floor Sharn Bek Hotel Shazron Hotel Shellard Hotel

Appropriate General Consultees	Appropriate General Consultees	Appropriate General Consultees
Shepperton Hotel Sheron House Bed & Breakfast Sherwood Hotel Shirley Dene Hotel Shores Hotel Show Door Apartments Silverdale Hotel Simons Somerset Apartments Somerville Hotel Southenders Hotel Southern Comfort Hotel Southlea St Davids Holiday Flats St Elmo Hotel St Ives Hotel St Kilda Hotel Stag Hotel Stage Door Hotel Starcliffe Hotel Stockton Grange Hotel Stones Properties Strachan Hotel Strathmore Hotel Strawberry Fields Hotel Sundown Hotel Sunnydale Sunnyhurst Hotel Sunnyside Guest House Sunnyside Hotel Sunset Hotel Sussex Hotel Sutton Park Hotel Sylver Crest Holiday Flats Sylvester Rest Home Talavera Hotel The Address The Ambleside The Atlantic Hotel The Avonlea Hotel The Bamford Hotel The Beachcomber Hotel	The Blue Haven Holiday Flats The Burleigh The Burns Hotel The Chimes The Claremont House Hotel The Cloverleaf Hotel The Craigmore The Crompton Hotel The Delamere The Draytonian The Dunes The Golden Sands The Grasmere The Gresford Hotel The Kimberley The Lantern Hotel The Laurels The Mackintosh Private Hotel The Marina The Merginn The Moores Hotel The New Central Hotel The Northdene The Old Coach House The Orlando Hotel The Pendeen The Pendeen Hotel The Pilatus The Rhyl Guest House The Rockdene Hotel The Rosedale Hotel The Royal Windsor Hotel The Rugbys The Sandal Wood The Seaside Hotel The Sherwood The South Lea The Southern Rebel The Sunset Guest House The Trades Hotel The Tudor The Valdene Hotel	The Victoria Hotel The Villa Hotel The Westcoe The Wilmar Guest House The Wilton Hotel The Windsor The Yealm Thornccliffe Touchwood Hotel Trentham Hotel Trianon Tudor Hotel Tudor House Tudor Rose Hotel Tuxford Guest House Tynan Hotel Valdene Hotel Vance House Verdo House Victoria Hotel Vidella Hotel Villa Mora Hotel Walcot Hotel Wallace Hotel Walverdene Hotel Waters Edge Hotel Wavecrest Hotel Waverley Hotel Waverley House Apartments West Vale Hotel Westcliff Hotel Westfield Hotel White Heather Hotel White House Hotel White Moon Hotel White Rose Hotel Wilmar Guest House Wilton Hotel Wingate Hotel Winston Hotel Wittom House Woodland Hotel

List of Respondents

Name / Organisation
Brian Johnson Planning Agent
Bernard Bryze Fylde Architect & Surveyors
David Hadwin Keystone Design Associates Ltd
Crystal Lodge Holiday Apartments
Keighley House
Alan Greenhalgh
Chris Plenderleith Leith Planning Association

Schedule of Comments and Reponses

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
1	Brian Johnston	New Homes' Board 5 Too restrictive on particular types, i.e. 1/2/3 bedrooms. Should be down to owner what is best for them and of course what will sell or rent best.	The housing mix is skewed in the inner areas towards smaller dwellings. In order to address the consequent social problems arising from this imbalance, policy HN6 restricts the number of new small dwellings created in a development.	The housing mix requirements have been amended and are now consistent with Policy HN6. Should they be reviewed through the Core Strategy, the final SPD will be reviewed accordingly.
2.1	Bernard Bryze	The single dwelling 90sq m as first option stands ok, the remainder of space is now generally tight for a second dwelling	Unsure where the 90sq m figure has come from. Flexibility may be allowed within the space standards to accommodate situations where the majority of minimal internal and external space standards are met.	N/A
2.2	Bernard Bryze	I feel the spaces should be standards with no compromise on the sizes	The Council will expect the minimum total dwelling sizes to be adhered to although accepts that the conversion of existing premises requires a degree of flexibility.	N/A
2.3	Bernard Bryze	Bedroom spaces. In the past you would allow a nominal corridor usually 1metre/half metre to be included in the calculation for the size of the bedroom. Instead, the sizes should be in rectangular spaces (min sizes ok although chimney breast an exception)	The existing SPD has minimum dimensions for room sizes, but is not clear on whether an area within that room with smaller dimensions can be included towards minimum area calculations. This clarification is considered useful.	There is now a requirement that minimum dimensions must be adhered to for <u>most of the length of a room</u> . Whilst this may allow a very small narrow area to be included, it will prevent a corridor being counted towards the minimum room area.
2.4	Bernard Bryze	Rear access, usually. Poor, gated back lanes, bins, poorly rendered rear extensions, odd windows badly maintained, no illumination (do not consider a good idea)	Rear access will normally only be appropriate in end of terrace locations.	There is now a requirement for all dwellings to have direct access from the street entrance or shared entrance hallway off the street entrance. Rear access will only be considered in exceptional circumstances.
2.5	Bernard Bryze	Amenity space. Small back areas, heavy bins, gated, yes open space used only when the sun is out ok for drying space. So now you have your example, a small area illuminating the front property with no access to bins. Bikes ok real amenity space. Cost. Knock up concrete, grass and fence as required.	This comment refers to the front cover illustration and to issues of bin and cycle storage, and private amenity space provision. The provision of bin and cycle storage is particularly challenging in the typical terraced layout of inner resort streets.	All outdoor space provided must be in addition to parking, cycle or waste storage provision, although there is now a recognition that a balance must be made. More guidance is now provided on the storage of cycles and waste, including opportunities for communal storage and within the building.

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
2.6	Bernard Bryze	The high cover 3m balcony sun trap outside amenity space. Great on plan, totally cost ineffective. The works involved for the use will be a major problem in having the works carried out.	Private outdoor space is highly valued and should be provided for any dwelling where possible to provide a good quality home. It may not be possible to create meaningful amenity areas in all cases, particularly in the inner areas. In which case, applicants will be expected to compensate for this with a higher quality internal layout.	There is now an emphasis on maximising opportunities to provide outdoor amenity space, including the removal of extensions and outbuildings and provision of roof terraces and balconies. Minimum standards relating to external amenity space and balconies / roof terrace areas have been moved to best practice guidance.
2.7	Bernard Bryze	The removal of sun lounges bays, good idea. £10k min will widen the feel at ground level. I think the cost will stop the job unless a street layout plan is altered as part of the works.	The removal of sun lounges improves the residential character of a street and brings the property to a domestic scale. This is often asked for on current planning applications in accordance with Policy HN5 and the supporting text to Policy LQ14. Applicants are normally allowed up to 3 years to remove this.	The removal of sun lounges is now a requirement irrespective of whether an adjoining property has one, in accordance with the supporting text to policy LQ14.
2.8	Bernard Bryze	Removal of roof lifts. Great for the street scene. Cost will make the works none effective. To replace roof say £20k min, a lot of making good.	The removal of poor quality, oversized roof-lifts brings properties and the street back to a more residential scale and character. Removing a roof-lift is a large undertaking so will only require this as part of the work to sub-divide a property.	N/A
2.9	Bernard Bryze	We are for a strategy. The hotelier is trapped, their only way out is for a developer to buy. If we take an 11 bed hotel, purchase today £80k-£120k. 4 flats planning min alt £25k per flat. Rented £480 per week, £25k year return on £220/180k, Good return and local authority pays [we assume this refers to Housing Benefit payments by tenants]. 2 houses. Purchase £100k alts, £50k per house, rented £300 per week. £15k return, 7.5% ok. If works can be carried out. The risk down from this figure will stop development.	This goes to the heart of one of the key issues. The conversion of holiday accommodation into multiple small flats with a high rental yield (arising from housing benefits payments) has led to a skewed housing provision in the inner resort areas with consequent social issues. The new guidance will set out modern space and amenity standards to raise the quality of new dwellings created through conversion and sub division. Small poor quality flats are no longer acceptable. The Council's policies are not based on maximising development yield, but on setting out minimum acceptable and deliverable standards for new housing.	N/A

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
2.10	Bernard Bryze	Something has to be done, without total redevelopment, the design, has really to incorporate a number of streets and the space to rears becomes the green oasis and this will require the a master plan on how is the best access achieved. The demolition of hotels, some rear demolition and the redesign of these rear spaces could create the community project necessary, introduce green oasis gardens to the poor back lane problem.	Comprehensive redevelopment would be one option to tackling the housing and environmental issues with the inner resort areas. However, the cost of such major intervention and the need for public sector funding assistance means that it is not feasible in the foreseeable future. The Council must therefore encourage owners and developers to work in innovative ways to re-use older guest houses and hotels.	N/A
3.1	David Hadwin	The vertical conversion used as an illustration is poor. This shows the rear property having no access off the street and the front property having no access to shared amenity space. Furthermore, there is no consideration of refuse storage. This is not a good design, contrary to current policy and draft requirements in this SPD.	This concept sketch was intended to show how a vertical conversion could work for illustrative purposes. It shows a rear entrance close to the end of a terrace and in fact each dwelling has access to its own amenity space. We acknowledge that it does not show how waste and cycle storage is dealt with.	Designing entrances to be visible from the street is important, and rear entrances may be considered close to the end of a terrace. This is now acknowledged in the document, which states that all dwellings must have direct access from the street entrance...and that rear access will only be considered in exceptional circumstances.
3.2	David Hadwin	There is a presumption in favour of vertical sub division, but this is not a good design. The example given in the document would provide a better design if converted horizontally into 3 flats.	Vertical conversions are not appropriate in all cases, but should be explored at end of terrace locations and as a means of providing a private street entrance to as many properties as possible.	N/A
3.3	David Hadwin	It might be useful have some examples of good design – see Tim Corry	It is intended that examples of good design will be provided separately on the Council's web page.	A link to a web page containing design examples and best practice will be included if necessary.
3.4	David Hadwin	The proportion of 2 bed properties is too low and should be higher. There is little appetite in the private sector for three bedroom plus flats; people looking for 3 bedrooms are usually looking for houses. The policy also motivates to include one bed dwellings in the conversion. In order to make the schemes work there would be an incentive to adopt 25% one bed, 50% two bed with the rest three bed. This surely is not what you are after. Suggest you put a threshold of say 8 units that can be two bed, then the mix in the Draft SPD.	We have revisited the housing mix requirement and found it went beyond the requirements of higher level planning policy, specifically Policy HN6 of the Local Plan, which is beyond the scope of any SPD. Within the inner neighbourhoods it is important to redress the current imbalance in housing provision away from small one and two bed properties towards three plus bed dwellings. Having a greater housing mix is something for the emerging Core Strategy to address.	The housing mix requirements have been amended and are now consistent with Policy HN6. Should they be reviewed through the Core Strategy, the Adopted SPD will be reviewed accordingly.

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
3.4.1	David Hadwin	Would the Council not want a presumption against single bed and studio accommodation after previous attempts to remove this type of accom?	The document states no dwelling designed for less than 2 people will be permitted. The SPD cannot go beyond the demands of Policy HN6 (see above)	N/A
3.5	David Hadwin	There is no requirement under the building regulations for level thresholds for conversion work due to space constraints. This should be removed from the policy. Similarly the item regarding lifts is superfluous to requirements as the maximum number of dwellings permitted under the managed house policy is 15.	After revisiting this issue the provision of level access is not a planning issue and has been moved to best practice guidance. The need for lifts to serve properties containing over 15 apartments above four storeys is considered essential to meet modern standards.	The requirements for level access have been moved to Part 3: Best Practice. No change to the lift requirement.
3.6	David Hadwin	Space standards are not realistic - a good sized two bed flat is 65sqm	The space standards are based on those in the London Housing Design Guide 2010, and adjusted to allow for conversion of existing spaces. The space standards have been the subject of a separate architectural feasibility study (on the conversion of former holiday accommodation) which has found that in most cases the standards can be met.	Minor adjustments have been made to the space standards after revisiting the London Housing Design Guide and Architectural Feasibility Study, in particular the size of studio flat (now the same as a 1 bed flat) and the size of a 2 bed and 3 bed house (reduced to a more reasonable size).
3.7	David Hadwin	Room height of 2.4m, standard height in new build is 2350mm – is this standard to be relaxed if the main building has low ceilings, particularly as we have to introduce lowered ceilings for sound proofing? Also what about rooms in roof space, useable floor space is 1.5m – a dresser against a 1.5m wall will have standing room in front, i.e. 1.8m height	2.4m is considered to be an appropriate figure. If the main building has low ceilings then how appropriate it will be to include towards the original floor area will be considered on a case by case basis. Floor space in roof space counting towards the original property must be above 2.14m (7'0") over at least half of the measurable floor area. Areas with a floor to ceiling height of 1.52m (5'0") will not count towards this measurement.	N/A Clarification on measurable floor space in the roof space is now included in the revised draft.
3.8	David Hadwin	Living space appears over large – equates to 6 x 4m for two bed flat, but not much bigger than 7 person accommodation. I would suggest that near 18 -20sqm for 2 person rising to 45sqm for 7 person	Aggregate areas are based on those in the London Housing Design Guide but amended to reflect typical existing local conditions (i.e. reduced by 10%).	The figures have been rounded to a single decimal point.

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
3.9	David Hadwin	The amenity space required is excessive and would not be able to be accommodated in the inner wards. The space standard for a one bed flat is 30% of floor area and equates to 4.0m x 5.0m area. The typical width of a mid terrace property is 5.0m. Therefore it would not be possible to convert an inner ward hotel into two dwellings due to amenity space.	Private outdoor space is highly valued and should be provided for any dwelling where possible to provide a good quality home. It may not be possible to create meaningful amenity areas in all cases, particularly in the inner areas. In which case, applicants will be expected to compensate for this with a higher quality internal layout.	There is now an emphasis on maximising all opportunities to provide outdoor amenity space, including the removal of extensions and outbuildings and provision of roof terraces and balconies. Minimum standards relating to ground floor external amenity area and balconies / roof terrace areas have been moved to best practice guidance.
3.10	David Hadwin	DS9 is out of date and unnecessary given the level of sound proofing that is now required in dwellings. This should be omitted.	Mitigation measures i.e. sound proofing are dealt with by building regulations although buffer zones and stacking is considered to be good design practice.	Minor amendment – no longer refers to 'unless appropriate mitigation measures are included'.
3.11	David Hadwin	The design tips should be omitted; they come across as patronising, and in some instances are incorrect.	Noted. It is intended that further design tips and good design practice notes will be made available on the Council's web site as the document is implemented.	The design tips have been omitted.
3.12	David Hadwin	The requirement for 5% of the floor area to be given over to storage is useless and conflicts with the aspirations of making best use of space. The space required for a typical flat is the same size as a kitchen. There is no requirement for this level of storage. This policy should be omitted and replaced with 'consideration should be given to storage requirements'.	The provision of adequate storage in modern dwellings is considered essential and 5% is considered to be an appropriate figure. This can be part of space within a room provided minimum habitable space standards are maintained.	N/A
3.13	David Hadwin	Policy 11.3 over steps the mark for a planning document and cannot be policed. This is a build issue and not a requirement under any other policy. This should be omitted.	After revisiting this issue the provision of a DDA compliant bathroom is not a planning issue and will be dealt with by building regulations where appropriate.	This has been omitted
		Policy 11.4 a DDA compliant bathroom is overly large and at odds with the requirements of any resident other than a wheel chair bound person. If such a conversion is required by a resident at a later date this could be accommodated by alteration works. It is not reasonable to try to make a building useable to all sectors of society at its inception.	After revisiting this issue the provision of a DDA compliant bathroom is not a planning issue and will be dealt with by building regulations where appropriate.	This has been moved to best practice.

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
3.14	David Hadwin	Policy DS12 is wrong. Parking standards are a maximum and dealt with under other policy. The park space sizes are in conflict with the unified policy for extensions amongst others. This needs to comply with the other standards.	On reflection, the parking standards proposed were not consistent with those in the Local Plan, which are maximum standards. It is acknowledged these aren't particularly useful for this SPD, and in view of existing problems with on-street parking, off-street parking should be encouraged more, providing it is appropriate and represents a net-gain over existing on-street provision. A balance must be made between amenity space and off-street parking.	The parking requirements have been rewritten to help reduce on-street parking pressures and to encourage off-street parking where appropriate, whilst balancing the need for outdoor amenity space.
3.15	David Hadwin	Policy 15 is too much for a typical conversion of a hotel to a single dwelling or a couple of flats. This is taking from code for sustainable homes which is optional and there is no requirement for this in new housing developments. Flooding is covered under separate policy. Bats and owl reports for hotels in Blackpool is not commonsense and only in very special cases should this be a requirement.	Sustainability is an important part of the guidance, however until the Energy Efficiency SPD comes forward to support Local Plan Policy LQ8, it is acknowledged the requirements for sustainability cannot be justified and will be moved to best practice. Should the Energy Efficiency SPD come forward then the Adopted SPD will be reviewed accordingly. The advice on flood risk and protected species is considered appropriate.	Sustainability requirements have been moved to best practice. Advice on flooding and protected species has been moved to Part 1: Introduction (issues to consider when submitting your planning application).
3.16	David Hadwin	The requirement to make it compulsory to introduce insulations and renewable energy is not practical and unnecessarily costly. For example you cannot use solar panels on flats, because it is not possible to connect them to a flat, without losing energy collected in the wiring to the flat. Windmills do not work, are ugly and noisy and no one yet has brought into the equation the carbon expended to manufacture one. This leaves ground source heat pumps which are not appropriate due to land take and cost about £8,000 per dwelling, driving the unit cost of a dwelling ever higher. This discourages conversion and will not help regenerate Blackpool.	See above.	Sustainability requirements have been moved to best practice.

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
3.17	David Hadwin	Policy 15g is out of date. The Waste Management Act came into force last April. There is no need to have this as policy	The Council has adopted the Joint Lancashire Minerals and Waste Local Development Framework which includes the Minimising and Managing Waste in New Developments SPD. Appropriate requirements in this document should be incorporated.	The 'Waste storage and services' section includes appropriate requirements to minimise waste in accordance with the Minimising and Managing Waste in New Developments SPD. These are also referenced in the best practice guidance section.
3.18	David Hadwin	<p>The policy is over prescriptive and too restrictive to allow imagination and progressive design. It aims at a common level, which is not a shared aspiration of prospective owners i.e. not everyone wants a garden.</p> <p>The policy is in conflict with national legislation on a number of issue, and seeks to be an all encompassing design guide, which of cause it cannot be because it only deals with planning and pays no attention to other aspects of good design, such as economics, buildability safety.</p> <p>This SPD will discourage the conversion of hotels into accommodation and will not help regenerate Blackpool.</p>	The document sets out the minimum guidance considered necessary to ensure that high quality residential dwellings are created. It recognises that the conversion of existing buildings requires a degree of flexibility, although expects all proposals to demonstrate an innovative, high quality design solution – indeed the Council will encourage innovative interpretations of the guidance to produce high quality living spaces. A separate study has shown the guidance to be technically feasible. The document does not conflict with national legislation although it does need to complement the building regulations requirements.	Many of the fundamental design requirements have been revised, in particular the changes will make it easier to convert an existing building into a single family home. The new standards are still asking for a high quality design but are more realistic to achieve. Any requirements that fall outside the control of planning and may be picked up by other regulations, including building regulations, have either been omitted or moved into the best practice guidance where appropriate.
4	Crystal Lodge Holiday Apartments:	Whilst the aims of these policies are laudable, there is no clear indication of how the council will police the planning to achieve quality conversions and stop HMOs. The Council's record in preventing HMOs is terrible and planning control has been non existent. How will this change?	Robust enforcement action is important to prevent further unlawful change of use to HMO. Following surveys of the Inner Resort areas, the Council now has comprehensive information on existing uses which will be used to closely monitor any unlawful change of use or development.	N/A
5	Keighley House:	Keighley House has been our home and business for the past 27 years, and my parents before that. During that time we have spent far more on the property than it is actually worth, and as a result I feel that we are being backed into a corner. If when the time came we would like to turn	Owners who cease trading as a guest house and continue to live in the property, require planning permission to do so since a material change of use has taken place. The Council accept that the conversion of former guest house business properties may require	Previous versions of the document proposed easier design standards for existing hotel owners, making it simpler for those who wanted to de-register their business and continue to live there as a family home. However, legal advice has confirmed that policy requirements should

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
		<p>our business into a private home, the requirements would be far beyond the expense that we could afford, and it would be more beneficial to continue living there and just pay the business rates.</p> <p>Alternatively, it would be cheaper to just trade when the season is at its most profitable and remain empty for the rest of the year. The specifications required to turn back to a house are fine for a property that is in need of repair but not for good properties that have been looked after.</p>	<p>owners to incur expense to meet the standards set out in the SPD.</p> <p>That is a matter of individual viability for owners to address.</p> <p>The Council would have no objection to guest house owners who maintain their properties to a high standard to trade seasonally.</p>	<p>be written for a general audience to avoid the risk of challenge and therefore this latest document does not include separate requirements for existing hotel owners - who have to meet the same requirements as everyone else wanting to convert a property into a single dwelling. Having said that the changes introduced in the document will make the requirements for conversion into a single dwelling easier.</p>
6	Alan Greenhalgh:	<p>There is a requirement that waste bins are screened from view but in practice how can this be enforced by the Council? On numerous roads where properties have been converted from holiday use to flats, rows of properties have many bins in the front garden. The southern end of Warbreck Drive is a good example of this.</p>	<p>The document requires bin storage areas to be screened from view at the side or rear of the property where possible. Applicants will need to demonstrate on a plan where the designated storage is.</p> <p>Any infringement from the design solution agreed as part of individual planning applications will be investigated where appropriate.</p>	N/A
7.1	Chris Penderleith – Leith Planning	<p>The guidance on relevant floor space and amenity standards to be achieved in residential conversions and sub-divisions has been drafted to update the currently “saved” Local Plan Policies HN5, HN6 and RR9 and in accordance with the future replacement policies in the Blackpool Core Strategy.</p> <p>The Council need to clearly define which policies in the Core Strategy are referable. There is also the concern that these standards are premature in advance of the debate concerning the soundness of the Core Strategy.</p>	Noted.	<p>The introductory text in the policy background section now clearly identifies relevant saved Local Plan Policies as well as relevant emerging Core Strategy Policies.</p>

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
7.2	Leith Planning	It is considered that the SPD imposes different and more onerous standards than those encapsulated in the Local Plan Policies. By way of example Policy HN6 refers to Housing Mix which provides a sliding scale in relation to the provision of one bedroom units whereas the SPD provides an either or approach. In short the SPD is not 'consistent' with the policies it is intended to supplement; there is an inherent conflict that should be addressed by means of a DPD.	SPDs must be consistent with higher level planning policies and cannot go beyond the requirements set out in these policies. Having revisited the proposed housing mix requirement we did find that it went beyond the requirements of Local Plan Policy HN6 by proposing to alter the mix of one bedroom/studio dwellings and introducing a limit on two bedroom units. This has been amended.	The housing mix requirements have been amended and are now consistent with Policy HN6. Should they be reviewed through the Core Strategy, the final SPD will be reviewed accordingly.
7.3	Leith Planning	Page 1.1 of the SPD states: "Blackpool has a substantial number of older properties, many of them former guest houses, where there is potential demand for conversion and sub-division. The Council recognises that the conversion of redundant premises including floor space above shops and former guest houses provide an important source of additional housing." We would support this assertion.	Noted	N/A
7.4	Leith Planning	Page 1.1 continues that: <i>"Conversion, refurbishment and sub-division of existing buildings can be a sustainable and economic way of providing new dwellings. It reduces the emissions and waste associated with demolition and the embodied energy associated with new-build."</i> It is noted that the Council accept that refurbishment and sub-division is a sustainable and economic way of providing new dwellings and that it reduces emissions and waste associated with demolition. We would support this assertion.	Noted	N/A

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
7.5	Leith Planning	<p>The document goes on to say: <i>"Poorly designed conversions can result in dwellings of inadequate size and quality leading to their inhabitants being exposed to a number of potential problems such as overcrowding, lack of amenity space, noise and inconvenient or unsafe access.</i></p> <p>It is unclear how this situation has arisen given the substance of Policy HN5 and SPG10 which establish the criterion for conversions; presumably the poorly designed conversions are unauthorised. The Council should support development incorporating a mix of accommodation (including 1 and 2 bedroom units).</p>	<p>The statement referred to is based on the most up to date evidence available to the Council, including work undertaken for the Core Strategy and in preparing Neighbourhood Plans for Foxhall, North Beach and South Beach.</p> <p>The housing mix requirements set out in Policy HN6 limit the amount of one bedroom accommodation. There is an opportunity for the Core Strategy to review this housing mix, which may result in this SPD being reviewed in the future in order to be consistent with future policies.</p>	
7.6	Leith Planning	<p>Whether or not there is an over-supply of small dwellings is a matter that should be debated in the Core Strategy and requires interpretation of an up-to-date survey. It would appear that the Council's approach to Housing Mix has changed from that in Policy HN6 - this would appear to represent a misuse of the SPD process.</p>	Please refer to 7.2 above	Please refer to 7.2 above
7.7	Leith Planning	<p>DS1: Can I convert or Subdivide my Property for Permanent Residential Use? We are concerned that there is a conflict between the design/amenity requirements in the saved policies (HN5, HN6 and RR9) of the Local Plan and those in the SPD; furthermore the SPD would appear to pre-empt the debate in the Core Strategy.</p>	<p>Policy DS1 was consistent with Saved Policies HN5, HN6 and RR9. There is no intention to pre-empt the Core Strategy.</p>	<p>Following a re-structure of the document, most of DS1 has been moved into Part 1: Introduction which explains the policy background (including HN5, HN6 and RR9).</p>
7.8	Leith Planning	<p>DS3: Can I sub-divide my Property? Clearly not all smaller dwellings are of a 'low standard'; what is important is that the renovation of properties incorporates a mix of accommodation. Policy HN6 is concerned with Housing Mix and as such it is presumed that the above problems have been caused by unauthorised</p>	<p>Other than the housing mix requirement (already covered in 7.2 above) Policy DS3 was consistent with Saved Policies HN5, HN6 and RR9.</p>	<p>The housing mix requirements have been amended and are now consistent with Policy HN6.</p>

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
		<p>development. There remains the concern that the Council are changing policy 'by the back door'; and the SPD incorporates changes to policy without proper independent scrutiny in accordance with the statutory procedures and as such should not be set out in an SPD.</p>		
7.9	Leith Planning	<p>DS8: External Space Standards Bearing in mind that we are dealing with an established urban area where amenity space is at a premium Policy PO1 and BH3 are sensible and sound. If the Council's intention is to change Policy PO1 and BH3 it should be done so in a DPD not an SPD.</p> <p>Clarification is sought from the Council in relation to their policy approach for parking, amenity space and cycle storage and how this will be applied to large Victorian properties (which are characteristic within the inner resort neighbourhoods) where the existing properties have very small gardens and little or no gardens to the front and on road parking restrictions. The Council have not distinguished between those standards which would apply to new development and those applied to the conversion of existing buildings which are subject to more constraints. This is a fundamental flaw within the SPD particularly where refurbishment is deemed to be sustainable.</p>	<p>Amenity Space Policy PO1: Planning Obligations is concerned with the provision of community facilities, including public open space. Policy BH3 is concerned with residential amenity and is therefore more pertinent.</p> <p>Policy BH3 recognises that provision of an adequate sized private amenity space is essential to creating a high quality residential environment. For houses this would be expected to take the form of a rear or side garden; in flat developments private amenity space can take the form of a shared courtyard/garden or, in appropriate locations, private balconies or roof terraces. It states that exceptions may be made for high quality flat developments in highly accessible locations which would have wider regeneration benefits and where the site characteristics preclude the provision of private amenity space.</p> <p>Policies HN5 and RR9 also support the provision of adequate private amenity space, including the need to remove existing extensions.</p> <p>SPDs must be consistent with higher level planning policies and cannot go beyond the requirements set out in these policies. Having revisited the</p>	<p>There is now an emphasis on maximising all opportunities to provide outdoor amenity space, including the removal of extensions and outbuildings and provision of roof terraces and balconies in accordance with Policies BH3, HN5 and RR9. Minimum standards relating to ground floor external amenity area and balconies / roof terrace areas have been moved to best practice guidance.</p> <p>The parking requirements have been re-written to help reduce on-street parking pressures and to encourage off-street parking where appropriate, whilst balancing the need for outdoor amenity space.</p> <p>All outdoor space provided must be in addition to parking, cycle or waste storage provision, although there is now a recognition that a balance must be made. More guidance is now provided on the storage of cycles and waste, including opportunities for communal storage and within the building.</p> <p>The document now distinguishes between standards that apply in all cases (i.e. houses and flats) and standards that only apply to flat developments. None of the standards apply to new build and it is intended to produce a separate SPD for design guidance on new build.</p>

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
			<p>proposed amenity standards whilst they do not go beyond the requirements of Policy BH3, it is considered more flexibility is required as it may not be possible to create meaningful amenity areas in all cases, particularly in the inner areas. In which case, applicants will be expected to compensate for this with a higher quality internal layout.</p> <p>Car Parking: On reflection, the parking standards proposed were not consistent with those in the Local Plan, which are maximum standards. These aren't particularly useful for this document and in view of existing problems with on-street parking, off-street parking should be encouraged more, providing it is appropriate and represents a net-gain over existing on-street provision. A balance must be made between the provision of amenity space and off-street parking.</p> <p>Cycle Parking: The provision of bin and cycle storage is particularly challenging in the typical terraced layout of inner resort streets. It is accepted that cycle parking as set out in the draft document presents design challenges</p>	
7.10	Leith Planning	<p>The starting point in the evaluation of a SPD is section 17 of the Planning and Compulsory Purchase Act 2004 (as amended 2008). The following sub-sections in Part 2 are noted:</p> <p>(3) the local planning authority's local development documents must (taken as a whole) set out the authority's policies (however expressed) relating to the development and use of land in their area.</p>	Please refer to 7.2 above	Please refer to 7.2 above

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
		<p>(5) if to any extent a policy set out in a local development document conflicts with any other statement or information in the document the conflict must be resolved in favour of the policy.</p> <p>For the avoidance of doubt it is considered that the SPD conflicts with the adopted plan as detailed above.</p> <p>(7) regulations under this section may prescribe...(b) the form and content of the local development documents.</p>		
7.14	Leith Planning	<p>Supplementary Planning Documents are dealt with in section 6 of PPS 12 and paragraph 6.1 states: “the planning authority may prepare supplementary planning documents to provide greater detail on the policy in its DPDs. SPDs should not be prepared with the aim of avoiding the need for the examination of policy which should be examined”.</p> <p>As explained in this submission the SPD goes further than providing detail on policy encapsulated in the Adopted Plan and does not explain which policies in the Core Strategy it is supposed to embellish. In short the SPD changes policy while avoiding the need for the examination of policy.</p> <p>Paragraph 6.4 deals with the preparation of supplementary guidance by other bodies and reads: “District/borough/city council's should not produce planning guidance other than SPD where the guidance is intended to be used in decision-making or the coordination of development. This could be construed as wishing to circumvent the provision for consultation and sustainability appraisal which SPD's have....</p>	<p>This SPD supports and expands on the following key local plan and LDF policies by providing guidance on the Council's design, space and amenity standards for residential conversions and sub-divisions:</p> <ul style="list-style-type: none"> ▪ HN5, HN6, RR9 (saved Local Plan policies) ▪ R20, G1, G4 (draft Core Strategy policies) <p>Following the revision to housing mix, it does not introduce new policies which would otherwise need to be examined.</p>	N/A

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft SPD
		<p>There is a concern that the New Homes from Old Places Draft Supplementary Planning Document does not fit comfortably with the sustainability appraisal associated with the Core Strategy. The overly prescriptive approach is in itself 'unsustainable' because it frustrates regeneration and re-use of existing properties in favour of wholesale redevelopment which is simply not viable.</p>	<p>The sustainability appraisal for the Core Strategy Preferred Option supports the Council's ambition to promote high quality single family homes, require residential proposals to comply with the Council's new housing standards and reducing the over-concentration of poor quality rented stock in inner areas. T</p> <p>The degree of prescription is considered appropriate to raise standards.</p>	<p>The separate Sustainability Appraisal produced for this SPD has been updated to reflect the revised draft.</p>
7.15	Leith Planning	<p>Paragraph 2.43 of the old PPS 12 has been revoked however it is worth quoting because it sets out the principles which applied to supplementary planning documents, namely:</p> <ul style="list-style-type: none"> • it must be consistent with national and regional planning policies as well as the policies set out in the development plan document contained in the Local Development Framework • it must be clearly cross-referenced to the relevant development plan document policy which it supplements • it must be reviewed on a regular basis; • the process by which it has been prepared must be clear and the statement of conformity with the statement of community involvement be published with it <p>The fact that SPDs rely on DPDs for the sustainability appraisal and statement of community involvement mean they are genuinely 'supplementary' and should simply expand on policy or provide further details of policy in a DPD.</p>	Noted.	N/A
7.17	Leith Planning	<p>Asked to be notified of developments with the evolving Local Development Framework in due course and when further public consultation takes place.</p>	Noted	N/A

Appendix 3: Consultation on Revised Draft SPD (January 2011)

List of Consultees (by email)

Specific Consultees	General Consultees	General Consultees	
Westby-with-Plumpton Parish Council Lancashire County Council Property Group Northwest Regional Development Agency Government Office North West North Lancashire PCT Natural England Highways Agency British Gas Properties Lancashire Fire & Rescue Service HQ Preston City Council Fylde Borough Council Strategic Health Authority (North West) United Utilities Natural England United Utilities Staining Parish Council Department For Transport Wyre Borough Council HCA Fylde Borough Council Highways Agency Northwest Regional Development Agency CABE English Heritage Fylde Borough Council Coal Authority Lancashire Constabulary 4NW Environment Agency Blackpool Primary Care Trust	<p>Councillors and MPs MP for Blackpool South MP for Blackpool North All Elected Local Councillors</p> <p>Previous Respondents Mr Askem, Crystal Lodge Gillian Wilsden Alan Greenhalgh Brian Johnston Mr S Lomax Dwent Mr R Dagwell</p> <p>Guest House Associations Stay-Blackpool Blackpool Self Catering Holiday Lancashire and Blackpool Tourist Board</p> <p>Planning Agents Mr Nigel Robinson Adams Holmes Associates Alan Jones Chartered Surveyors Architectural Design Services Cass Associates Cassidy and Ashton Cliff Walsingham & Company Croft Goode Partnership DePol Associates Ltd Dev Plan UK Drivers Jonas Deloitte Firth Associates Ltd Graduate Planner Steven Abbott Associates Graham Anthony Consultants GVA Grimley Halcrow Group Ltd Higham & Co</p>	<p>Home Plan Designs How Planning Indigo Planning JMP Consulting Jones Lang LaSalle Julie Cary Planning Keystone Design Associates King Sturge LLP Lambert Smith Hampton Leith Planning Limited Mackeith Dickinson & Partners Midgley Drawing Service Mosaic Town Planning MPSL Planning & Design Ltd Nathaniel Lichfield and Partners NTJ Design Paul Butler Associates Peacock & Smith Consultants Planning & Design Services Ltd Stewart Ross Associates Turley Associates Fylde Architects and Surveyors Moirá Graham Lydia Whitaker D Kovacks Mr Paul Martin RV Hopper Dave Garlick Eric Forster John Rowe Mr Philip Jackson Jim Baines</p> <p>Other Blackpool Fylde and Wyre EDC</p>	

List of Consultees (by letter)

General Consultees	General Consultees	General Consultees
<p><u>Planning Agents</u> Plantasia Mr D Turnbull Mr K Johnstone Mr G Senior Bromley Parker Architects Chris Hewitt Architect Ltd Fylde Architects & Surveyors Mr B Atkinson M L Planning Services Fletcher Smith Architects Mr I Standidge Mr R Bancroft Mellor Architects Mr R Ansell Mr J Whiteside Wilkinson Developments Mr L Morgan Graham Anthony Associates Fish Associates Keith Gleeson</p>	<p><u>Holiday Area Cluster Groups</u> Palatine Cluster Group Reads Avenue Cluster Group Gynn Avenue Cluster Group King Edward Avenue Cluster Group Havelock Street Cluster Group Woodfield Road Cluster Group Bispham Traders and Hoteliers Association Blackpool Combined Association Gynn Avenue Hotels Association Blackpool Hotel and Guest House Consortium Bispham Hotel & Traders Association</p>	

List of Respondents (and Representations made)

Name / Organisation
<p>Coal Authority – No comments Highways Agency – No comments Natural England – note that the information provided demonstrates that the Core Strategy HRA Screening Report identified that the policies relevant to the SPD will have no significant adverse effect on any Natura 2000 site, and that no further HRA Screening Report or Appropriate Assessment is required at this stage. Network Rail – No comments United Utilities – No comments</p>

Appendix 4: Conformity with NW Regional Spatial Strategy (RSS)

Following advice that local planning authorities should reach their own view on whether an emerging Plan is in conformity with RSS, we have reviewed the RSS and identified key policies relevant to the 'New Homes from Old Places Residential Conversion and Sub-division SPD'. These are as follows:

Key RSS Policies relevant to 'New Homes from Old Places Residential Conversion and Sub-division SPD'
Policy DP1: Spatial Principles
Policy DP2: Promote Sustainable Communities
Policy DP7: Promote Environmental Quality
Policy DP9: Reduce Emissions and Adapt to Climate Change
Policy RDF3: The Coast
Policy L3: Existing Housing Stock and Housing Renewal
Policy CLCR1: Central Lancashire City Region Priorities
Policy CLCR2: Focus for Development and Investment in Central Lancashire City Region

RSS is underpinned by the spatial principles in Policy DP1, which the 'New Homes from Old Places Residential Conversion and Sub-division SPD' conforms to. The SPD aims to improve the built environment, promote community cohesion and improve quality of living standards and thus quality of life (supporting Policy DP2); encourage regeneration and improve the town's image (Policy RDF3); and balance the local housing market by addressing the over-supply of small flats and poor quality dwellings (Policy L3). Furthermore, it is consistent with the Central Lancashire City Region priorities.

It is Blackpool Council's view that 'New Homes from Old Places Residential Conversion and Sub-division SPD' is in conformity with the RSS.