

NEW HOMES FROM OLD PLACES
Draft Residential Conversion and Sub-division Supplementary Planning Document
Equality Impact Assessment (EIA)

Department: Planning

Team or Service Area Leading Assessment: Development Plans and Projects

Title of Policy/ Service or Function: New Homes From Old Places - Draft Residential Conversion and Sub-division Supplementary Planning Document

Proposals to introduce/ alter/ delete policy, service, expenditure etc: The proposals replace the existing adopted Supplementary Planning Guidance Note 10 (SPG10) – Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats

Date of proposals: May 2010 **Committee/Team:**

Lead Officer: Steve Matthews

The 'New Homes From Old Places' Draft Residential Conversion and Sub-division Supplementary Planning Document provides updated supplementary guidance on relevant floorspace and amenity standards to be achieved in residential conversions and sub-divisions allowed under the currently "saved" Local Plan Policies HN5 and RR9 and in accordance with future replacement policies in the Blackpool Core Strategy.

The document aims to ensure that sustainable development principles are considered during the design and construction of residential conversions and subdivisions; improve the quality of residential conversions and sub-division through application of modern space and amenity standards; address the over-supply of small flatted dwellings, particularly in the inner resort neighbourhoods; prevent former guest-houses and similar accommodation falling into HMO use while providing a sustainable conversion route; and improve the character and quality of existing and emerging residential neighbourhoods.

An EIA has been undertaken to ensure all relevant and appropriate equality concerns have been taken into consideration when developing the proposals in this document.

The EIA Approach

This EIA has been undertaken based on an appropriate and proportionate approach in line with the 9 main steps set out in the Blackpool Council Guidance on carrying out EIAs. These are as follows:

- An initial simplified impact assessment of all policies has been undertaken as the first stage of the EIA (page 3).
- The EIA has then undertaken a Step 1 assessment of the purpose, aims and content of the principle policies in the 'New Homes From Old Places' document, and the specific design policies where a potential impact on different communities or groups was identified in the initial simplified impact assessment.
- Otherwise the focus of the EIA is on the 'New Homes From Old Places' document as a whole, including Step 2 (information available) and Step 3 (Impact on different groups).
- No Step 4 adverse impacts have been identified, although additional work in the form of a financial feasibility assessment of the design requirements (due to be completed prior to formal adoption of the document by the Council) is recognised. It is a main priority of the 'New Homes From Old Places' document to provide an improved housing offer, support regeneration, and tackle deprivation and inequalities – and this conclusion is consistent with this focus.
- While no adverse impacts have been identified, Step 5 consultation will take place in line with the normal planning requirements of preparing a Supplementary Planning Document (SPD) as part of the Council's Local Development Framework. This Equality Impact Assessment and a Sustainability Appraisal of the SPD and will both be made publicly available as part of the public consultation process.
- In terms of Step 6 (Decision) the results of the consultation will inform the Council's final decision on the policies to be included in the SPD, which will then require approval from the Council's Executive Committee.
- Step 7 (monitoring and review) is an integral part of the planning process, and this will include specific monitoring of its policies on community cohesion, deprivation, and on specific neighbourhoods and groups.
- Step 8 (Action Plan) ensures the 'impacts' of the SPD proposals, when finalised, can properly be assessed by the development of an effective monitoring system.

Summary of EIA Findings

The updated planning policy contained in this document will provide an improved choice of aspirational and affordable housing (in terms of type, size and location) in inner Blackpool. The policy aims to secure a better quality of life for residents and encourage social inclusion, by giving everyone access to decent and appropriate accommodation where possible.

Success in reducing the number of poor quality rented properties will lead to the displacement of some residents in inner Blackpool. However this is fundamental to improving the character and quality of these neighbourhoods. The Council will be pro-active in helping to ensure that people who are displaced are moved to more suitable accommodation.

The Council will consider the technical feasibility of the SPD requirements prior to the final document being approved and made public (expected later in 2010).

**INITIAL IMPACT ASSESSMENT
(Considering All Proposals in the Draft SPD)**

New Homes from Old Places SPD Proposals	Equality Impact	
	Policy Neutral	Potential Specific Impact *
Principles		
DS 1: Can I Convert or Subdivide my Property for Permanent Residential Use?		√
DS 2: Conversion from a Guest House or Holiday Accommodation to a Single Dwelling	√	
DS 3: Can I Sub-divide My Property?		√
Appearance, Entrance and Approach		
DS 4: Facade and Frontage	√	
DS 5: Entrance, Access, Security		√
Size, Space and Layout		
DS 6: Dwelling Size		√
DS 7: Habitable Space Standards		√
DS 8: External Space Standards		√
DS 9: Layout		√
DS 10: Internal Ancillary Spaces		√
DS 11: Bathrooms and WCs		√
Car Parking, Storage and Services		
DS 12: Car Parking		√
DS 13: Cycle Storage	√	
DS 14: Waste Storage and Services		√
Sustainability		
DS 15: Sustainability	√	
DS 15b: Water Conservation	√	
DS 15c: Flood Risk	√	
DS 15d: Biodiversity and Green Infrastructure	√	
DS 15e: Protected Species	√	
DS 15f: Renewable Energy and Reducing CO2 emissions	√	
DS 15g: Waste Minimisation	√	

*Where a policy is identified to have a specific impact on quality issues, an analysis of the purpose and aims of the policy has been undertaken in step 1.

STEP 1 - IDENTIFYING THE PURPOSE OR AIMS

Principles of Conversion or Sub-Division

1. What type of policy, service or function is this? *Updated Planning Policy*
2. What is the aim and purpose of the policy, service or function?

Policy DS 1: Can I Convert / Subdivide my Property for Permanent Residential Use?

Applications for conversion and/or sub-division for residential use will be supported in principle, subject to:

- *The proposals relate well in use, scale & appearance to neighbouring properties;*
- *They meet appropriate Design Statement Requirements set out in the document;*
- *They are not identified as being required for another use in “saved” policies of the Local Plan (or their replacement Core Strategy policies) and the need for that safeguarding still exists. This includes:*
 - i) main holiday areas where there is a continuing viable concentration of such use;*
 - ii) allocated employment areas; and*
 - iii) ground floor use of existing shops and community premises in the town centre, district and local centres.*

Policy DS 2: Conversion from Guest House/Holiday Accommodation to Single Home

- *All signage, awnings, shutters and canopies must be removed unless they are part of the built fabric of the original building or an important architectural or heritage feature.*
- *Non-original street-facing sun lounges must be removed and the original facade reinstated if an adjoining property has no sun-lounge except in exceptional circumstances. Where it is not possible to restore the facade to match with the remaining built fabric then an appropriate “whole facade” treatment should be adopted. Whilst the preference will be for a rendered finish, there may be some instances where innovative contemporary facade designs of a high design quality, workmanship and materials may be acceptable. Replacement walls, windows and doors must be consistent in proportion and position to those in the original building.*
- *All dwellings must meet or exceed the minimum External Space Standards as set out in Design Note 8.*
- *Planning permissions granted in accordance with this Design Note will normally include a condition allowing a period of 3 years in which to meet these requirements*

DS 3: Can I Sub-divide my Property?

- *Any original property below 156m² cannot be sub-divided.*
- *An original property between 156m² and 191m² can be divided into a maximum of two dwellings. Any property larger than 191m² can be converted to a greater number of dwellings following the spatial guidance in this document.*
- *The maximum number of one bed or studio dwellings in any development is one in four. The maximum proportion of dwellings with 2 or fewer bedrooms is 1 in 2.*
- *All dwellings must be self-contained with their own individual entrance doors opening off the street or common entrance hall.*
- *No dwelling designed for less than 2 people will be permitted.*
- *The Design and Access statement accompanying applications for conversion of former holiday accommodation properties must include a statement responding to the following key design issues:*
 - 1. Can a single family home be created? -if not why?*
 - 2. Can the property be sub divided vertically? if not why?*
 - 3. Have the original room dimensions and circulation space been retained/ reinstated? If not why?*

3. Please outline any proposals being considered.

To support the re-use of existing buildings through conversion and sub-division for residential use provided they meet the location and other design/amenity requirements of appropriate saved policies of the local plan and those in the emerging Core Strategy.

To identify guidance for converting an existing Guest House outside of the designated holiday accommodation areas for use as a single family home.

To deliver a balanced housing mix and sustainable neighbourhoods, by discouraging the conversion and sub-division of properties into relatively small units; and encouraging larger flats and single family homes.

4. Why are the proposals being made - for what reason?

The proposals are informed by the emerging Core Strategy, which sets out a future strategy of providing sufficient housing across Blackpool by 2026. This includes delivering a better balanced and more appropriate mix of housing in the inner area through regeneration, housing intervention and market uplift (with the exception of main holiday areas, allocated employment areas, and the ground floor of existing shops and community premises in the town centre, district and local centres, which are safeguarded).

Over recent years the conversion of increasing numbers of unviable guest houses concentrated in the inner area has given rise to a disproportionate number of small dwellings, many of which are low standard. This has led to imbalance in the property market; a lack of dwellings catering for other sectors of the population; and economic and social issues. Identifying floorspace thresholds will help to deliver a more appropriate mix of housing. This is also consistent with the Blackpool Housing Statement 2009-2012.

5. What outcomes do we want to achieve

To provide a new, better-balanced and more appropriate mix of housing meeting the needs of existing and future community's; to improve social & economic well-being through neighbourhood regeneration; and to enhance the inner areas of Blackpool.

6. Who is the policy; service or function intended to help/ benefit?

Current and future residents; property owners; businesses; local architectural and planning agents

7. Who are the main stakeholders/ customers/ communities of interest?

Main stakeholders: Blackpool Council; ReBlackpool; property owners; Registered Social Landlords (RSLs); Blackpool Coastal Housing
Customers: local architectural and planning agents; property owners
Communities of interest: Residents; businesses

8. Does the policy, service or function have any existing aims in relation to equality, social inclusion or community cohesion?

The policy will provide an improved choice of aspirational and affordable housing (in terms of type, size and location) in the inner area, which will contribute towards: social inclusion and cohesion by seeking to meet the needs of all different types of households; and securing a better quality of life for residents.

The Core Strategy instructs that this policy will not apply to those individuals/ groups who find themselves in the areas safeguarded for non-residential use, including main holiday areas.

9. How is the resulting service or function delivered/ administered?

The policy will be implemented by Blackpool Council through the statutory development control system, and delivered by ReBlackpool, property owners, developers and housing providers.

Design Requirements

10. What type of policy, service or function is this? *Updated Planning Policy*
11. What is the aim and purpose of the policy, service or function?

Policy DS 5: Entrance, Access, Security

- *Where original street facing boundary walls have been removed these must be reinstated in line with those originally in place unless shown to be inappropriate.*
- *Where dwellings share a street entrance they must each be provided with entry phones linked to a secure main door and electronic door release.*
- *All dwellings entered at or above 4th floor level should be served by a wheelchair accessible lift. This requirement may be relaxed for developments of fewer than 15 dwellings where cost of fitting a lift would be prohibitive.*
- *All outside entrances must be lit by appropriate security lighting.*
- *Applications must be accompanied by a management plan explaining arrangements for future shared maintenance of external fabric, day to day maintenance of communal areas, and security arrangements.*
- *All dwellings must have direct access from the street entrance or shared entrance hallway off the street entrance.*

Policy DS 6: Dwelling Size

All dwellings that result from conversion or sub-division must meet the minimum space standards as set out in Table 1 (laid out in the document).

Policy DS 7: Habitable Space Standards

- *All rooms within dwellings that result from conversion or sub-division must adhere to the space standards in Table 2 (laid out in the document).*
- *All rooms, apart from storage areas, must have a minimum floor to ceiling height of 2.4m.*

Policy DS 8: External Space Standards

- *All dwellings created through conversion from other uses must be provided with a separate, private external amenity space accessed from the same level.*
- *Converted or sub-divided dwellings without ground-floor access must provide a separate dedicated private outdoor space. This may be provided in the form of balconies or roof-terraces or similar, located or designed so they do not result in unacceptable loss of privacy to other residential properties and as an integral part of a building's appearance.*
- *Ground-floor dwellings created through conversion or sub-division must access private outdoor amenity space within the property curtilage to the minimum standards set out in the document.*
- *Balconies and roof terraces must have a minimum area of 3m² for a 2 person dwelling, rising by 1m² per additional person, and a minimum depth of 1.5m.*
- *All balconies and roof terraces must have dedicated drainage.*
- *All outdoor amenity space must be provided separate from outdoor parking, cycle or waste storage provision.*

Policy DS 9: Layout

- *In order to minimise noise nuisance between sub-divided dwellings, habitable and non-habitable rooms of adjoining dwellings should not share common walls, floors and ceilings, unless appropriate mitigation measures are included.*
- *Designers must minimise the use of dedicated circulation space (other than stairs) wherever possible to make dwellings more space efficient and provide larger living spaces.*

Policy DS 10: Internal Ancillary Spaces

- All converted dwellings must provide a minimum of 5% of their Gross Internal Floor Area (GIFA) for storage.
- All dwellings must show that they provide space for washing machines, clothes drying, domestic waste and recycling bins within the home.
- Communal space at ground floor level should be a minimum clear width of 900mm to facilitate disabled access unless structurally impossible.
- Circulation space within buildings accessed above ground level are to have a minimum clear width of 850mm unless structurally impossible.

Policy DS 11: Bathrooms and WCs

- All dwellings designed for five people or more must provide a minimum of a family bathroom and additional separate WC.
- Habitable rooms that are not bedrooms must not have en-suite facilities.
- All walls in bathrooms and WCs in ground floor dwellings should be capable of taking handrails and other adaptations and should be reinforced between 300mm and 1500mm above floor level.
- All dwellings accessed from ground floor level must provide at least one bathroom and WC that is capable of adaptation to DDA layout and space standards.
- At least one toilet or bathroom must be immediately accessed from the general circulation area of any dwelling.

Policy DS 12: Car Parking

- Car parking provision should accord with the relevant adopted car parking standards. Currently these are as follows:
 - 1-2 bed dwellings: 1 space maximum
 - 3 bed dwellings: 1-1.5 spaces maximum
 - 4+ bed dwellings: 2 spaces maximum
- Where they are provided within the property curtilage parking spaces must be 2.4m wide and 5m long. Provision must be made for there to be an additional 1.2m space to one side of the space.
- A maximum of 1 car parking space will be permissible within a front curtilage.

Policy DS 14: Waste storage and services

- Every dwelling must have adequate storage space for the waste and recycling bins provided by the Council. Where a development is resulting in several dwellings being created shared waste storage areas may be a better solution.
- Waste storage areas must be provided off-street with easy street access, be secure and screened from view.
- Waste storage areas must be fully accessible by wheelchair users where there is a ground floor dwelling with level entrance access.
- Utility meters and service points must be placed in a position that is easily accessible by service engineers and is concealed from view.

12. Please outline any proposals being considered.

As outlined in policies DS 5-12 (inclusive) and DS 14 above.

13. Why are the proposals being made - for what reason?

To create well-designed, safe & accessible entrances and approaches to a dwelling, to reduce the incidence of crime and fear of crime, make people feel secure in their homes, and make the building accessible to all wherever possible.

To create adequate and flexible space provision in dwellings and increase the useable lifespan. Generosity of space within a dwelling, and good design, enable flexibility of use within rooms, to reflect the changing needs of its occupiers. Larger

rooms and circulation space mean that more properties are accessible to more people.

Inappropriately designed or located car parking can have a detrimental effect on a street or neighbourhood with the area appearing to be dominated by vehicles. Where parking is provided off-street this must allow for disabled use. Adequate space must be provided to store all bins provided. Waste storage areas must be designed to be accessible for wheelchair use.

14. What outcomes do we want to achieve

To provide better quality housing that meets the needs of all existing and future residents where possible.

15. Who is the policy; service or function intended to help/ benefit?

Current and future residents / property owners / businesses / local architectural and planning agents

16. Who are the main stakeholders/ customers/ communities of interest?

Main stakeholders: Blackpool Council; ReBlackpool; property owners; Registered Social Landlords (RSLs); Blackpool Coastal Housing
Customers: local architectural and planning agents; property owners
Communities of interest: Residents; businesses

17. Does the policy, service or function have any existing aims in relation to equality, social inclusion or community cohesion?

The policy aims to secure a better quality of life for residents and encourage social inclusion, by giving everyone access to decent and appropriate accommodation where possible.

18. How is the resulting service or function delivered/ administered?

The policy will be implemented by Blackpool Council through the statutory development control system, and delivered by ReBlackpool, property owners, developers and housing providers.

STEP 2 - CONSIDERING EXISTING INFORMATION AND WHAT THIS TELLS YOU

19. Please summarise the main data/ research and performance management information in the box below.

<p><i>Date/ information</i></p> <p>Blackpool Core Strategy Draft Preferred Option, Blackpool Council, 2010 Blackpool Housing Statement 2009-2012, Blackpool Council, 2009 Code for Sustainable Homes: Technical Guide, CLG, 2009 (V2) Draft London Housing Design Guide, Greater London Authority, 2009 Secured by Design, New Homes, 2008 Building for Life, CABI, 2008 English Partnerships' Quality Standards 2007 Private Sector House Condition Survey, Blackpool Council, 2007 Joint Lancashire Minerals And Waste Development Framework <i>Minimising And Managing Waste In New Developments SPD</i>, 2007 Lancashire Minerals and Waste Local Plan, 2006 Housing Space Standards, HATC for the Greater London Authority, 2006 What Homebuyers Want, CABI, 2005 Joint Lancashire Structure Plan <i>Access and Parking SPG</i>, 2005 The Home Buyer's Guide, Ely, 2004 English House Condition Survey, CLG, 2003 Blackpool: A Study for Regeneration, WHHLP, 2001 Lifetime Homes, www.lifetimehomes.org.uk Environment Agency, www.environment-agency.gov.uk</p>
<p><i>Research or comparative information</i></p> <p>As above</p>
<p><i>Key findings of consultation and feedback</i></p> <p>A consultation exercise was undertaken on an earlier version of the document produced in May 2009. We consulted local architectural and planning agents and appropriate holiday accommodation organisations over a four week period between 3rd August and 31st August 2009. Only four consultation responses were received, although the comments made were comprehensive and raised a number of fundamental issues which has resulted in a significant shift in approach.</p> <p><i>Key Issues Raised</i></p> <ul style="list-style-type: none"> • 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 further unlawful HMOs and also planning blight. • Need to understand potential and possible unintended impacts on already weak and at risk guest housing sector. • There is no market for the proposed large houses that would be created through the proposals. Instead of resulting in improved social mix, it could lead to worsening of current situation with large properties becoming popular for vulnerable families. <p>Wider public consultation will take place for six weeks on the Draft 'New Homes from Old Places' SPD, ending on the 5th July 2010.</p>

20. What are the impacts or effects for communities?

<i>Race or ethnicity</i>
No specific impacts or effects
<i>Gender and Trans</i>
No specific impacts or effects
<i>Age</i>
The design requirements proposed in the document embrace the concept of 'lifetime homes' by: <ul style="list-style-type: none"> ▪ promoting adequate space provision in dwellings to enhance their flexibility and scope of use, making them popular with a wider demographic sector; and ▪ promoting a well-designed layout to increase the useable lifespan of a dwelling, making it adaptable to reflect the changing needs of its occupiers.
<i>Disability</i>
The design requirements proposed in the document embrace the concept of more properties being accessible to more people, by promoting easy access, generous space standards, well-designed layouts and appropriate facilities suitable for use by all, including both the able bodied, disabled and infirm.
<i>Religion or belief/ faith communities</i>
No specific impacts or effects
<i>Lesbian, gay, bisexual people</i>
No specific impacts or effects
<i>Other socially excluded communities or groups</i>
Some areas are identified as being required for a non-residential use in 'saved' policies of the Local Plan or replacement Core Strategy policies and the need for that safeguarding still exists. Therefore, this document does not apply to these areas, which include main holiday areas, allocated employment areas and the ground floor of existing shops and community premises in the town centre, district and local centres. However safeguarding these for non-residential use is fundamental to achieving the spatial objectives across Blackpool. Success in reducing the number of poor quality rented properties will lead to the displacement of some residents in inner Blackpool. However this is fundamental to improving the character and quality of these neighbourhoods. The Council will be pro-active in helping to ensure that people who are displaced are moved to more suitable accommodation.
<i>Relationships between or within communities</i>
Considering inclusive design requirements will make future dwellings popular with a wider demographic sector, and promote social inclusion.

21. What do you know about how the proposals will impact on different communities?

The proposals seek to improve the character and quality of existing and emerging residential neighbourhoods, prevent former guest-houses and similar accommodation falling into HMO use, make inner Blackpool more attractive to a wider demographic population and improve resident's quality of life by applying modern space and amenity standards.
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STEP 3 - ASSESSING THE IMPACT

This step refers to the 'New Homes from Old Places' document as a whole

22. Is there any evidence of higher or lower take-up by any group or community, and if so, how is this explained?

This document will be a material planning consideration when determining future planning applications, and all development involving residential conversion or subdivision will be expected to conform to the proposals. It is expected to have the greatest consequence on the conversion or subdivision of redundant premises including former guest houses and floor space above shops, which provide an important source of additional housing.

The document seeks to raise the quality of new homes in the inner area, to meet the requirements of those who are active in the local economy, with a view to attracting more families in particular. It also seeks to attract and retain retirees in areas that are currently relatively unpopular as part of the regeneration of those areas. Success in reducing the number of poor quality rented properties will lead to the displacement of some current tenants of these properties, including benefit claimants and transients. However this is fundamental to improving the character and quality of these neighbourhoods.

23. Does the geography or demography of service users reveal anything?

Generally, responses are likely to be received from those who are most affected by the proposals contained in the document. These are mainly local planning and architectural agents and individuals/ groups who own premises in the inner area thinking of converting or subdividing their property into residential use. These are non-geography/demographic specific.

24. Do any rules or requirements prevent any groups or communities from using or accessing the service?

As highlighted in question 20, some areas are identified as being required for a non-residential use in "saved" policies of the Local Plan or replacement Core Strategy policies and the need for that safeguarding still exists. Therefore, this document does not apply to these areas, which include main holiday areas, allocated employment areas and the ground floor of existing shops and community premises in the town centre, district and local centres. However safeguarding these for non-residential use is fundamental to achieving the spatial objectives across Blackpool.

25. Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people? (DDA duties arising out of DDA 1995)

The document should lead to improved access standards and use of premises by disabled people.

26. Does the way a service is delivered/ or the policy create any additional barriers for any other groups or communities, for example, due to limited income or because of the time during the week or day when the service is available? E.g. women, cultural reasons.

The Council will consider the technical feasibility of the SPD requirements prior to the final document being approved and made public (expected later in 2010) to ensure that the proposals are realistic and feasible to implement.

27. Do any of these limitations amount to unlawful discrimination? No

If yes, please explain (referring to relevant legislation) in the box below

N/A

28. If No, do they amount to a differential impact, which should be addressed? No

If yes, please give details in the boxes below.

N/A

29. If the impact or effects are adverse for any community or group, can they be defended in order to provide equality for another community under legislation or policy?

N/A

Please give details below.

N/A

30. Do you have enough information to make a judgement?

Not at the moment

If no, what information do you require, about which communities?

See question 26 above. The Council will consider the technical feasibility of the SPD requirements prior to the final document being approved and made public (expected later in 2010).

31. Is it possible to get the information quickly and easily or is it recommended that the collection of such data be included as an action for the action plan that will be developed? Please detail below.

Resources are available for this work to be completed quickly.

STEP 4 - DEALING WITH ADVERSE OR UNLAWFUL IMPACT

This step again refers to the 'New Homes from Old Places' document as a whole

32. What can be done to improve the policy, service, function or any proposals in order to reduce or remove any adverse impact or effects identified?

Further consultation as detailed in step 5.
Furthermore, further consultation is due to be carried out on the Core Strategy Draft Preferred Option, which will give people the opportunity to comment on those areas proposed to be safeguarded for non-residential use.
Improved pre-application advice service by officers.

33. What would be needed to be able to do this? Are the resources likely to be available?

Consultation is an integral part of the process and existing resources are set aside for this. An improved pre-application advice service may require more resources in the planning department.

34. What other support or changes would be necessary to carry out these actions?

The final 'New Homes from Old Places' document is due to be adopted later in 2010. Once the Core Strategy is adopted (expected 2011) we may need to re-consult on the document to ensure compatibility with the new policies.

STEP 5 - CONSULTING THOSE AFFECTED FOR THEIR VIEWS

35. Please outline the steps taken to test out your findings and possible courses of action below.

The draft document will go out to public consultation, where stakeholders and interested parties or individuals will be able to put forward comments, concerns or suggestions. Comments received on the draft document will be considered by the Council, and where necessary changes will be made before the final document is published.

36. What feedback or responses have you received to the findings and possible courses of action? Please give details below.

A consultation exercise was undertaken on an earlier version of the document over a four week period between 3rd August and 31st August 2009. We consulted local architectural and planning agents and appropriate holiday accommodation organisations. Only four consultation responses were received, although the comments made were comprehensive and raised a number of fundamental issues which subsequent drafts of the document have needed to address.

37. If you have not been able to carry out any consultation, please indicate below how you intend to test out your findings and recommended actions.

N/A

38. If you are impact assessing some proposals, what steps have been taken to ensure that stakeholders have been able to voice their opinions on the proposals or the need for change?

The concept behind the proposals, which is to remodel the inner areas to provide a new and better inner Blackpool housing offer, is informed by saved policies in the existing Blackpool Local Plan and the emerging Core Strategy Preferred Option document. Key stakeholders, including a number of statutory consultees and members of the public, have been involved in forming these documents.

STEP 6 - ACTION PLANNING

Please outline your proposed action plan below.

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
None at this stage. Further consultation on this document or the emerging Core Strategy may raise issues and impacts we need to consider.	All comments made on the draft document will be considered; and changes made where necessary.	All comments will be recorded in a separate statement of consultation.	Consultation on this draft SPD to be completed by the 5 th July 2010. Adoption of the SPD expected later in 2010.	The planning department is primarily responsible for adopting and implementing the document.	Agreement is required from the Council's Executive Committee prior to adopting the final document.

STEP 7 - ARRANGEMENTS FOR MONITORING AND REVIEW

Please outline your arrangements for future monitoring and review below.

Agreed action	Monitoring arrangements	Timeframe	Responsibility	Added to Service Plan etc.
To undertake an Annual Monitoring Review (AMR)	As detailed in the AMR document	Produced annually	The planning department is primarily responsible for collating information and producing this document.	
To undertake MIPS work and take enforcement action where appropriate	To monitor the quality of accommodation in the inner area, including the number of HMOs	Ongoing	The MIPS team / Enforcement / Quality Control	

Date completed:

Signed:

Name:

Position: