

HOLIDAY ACCOMMODATION CONSULTATION REPORT

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APPENDIX 1

Appendix 1a: Holiday Accommodation and Core Strategy Exhibitions

Date	Holiday Area	Location	Time	No. of Attendees
7 th June 2010	South Beach	St Peter's Church, Lytham Road	2-8 pm	72
10 th June 2010	Pleasure Beach	Holy Trinity Church, Dean Street	2-8 pm	30
14 th June 2010	Foxhall and Central Promenade	Blackpool Philharmonic Club, Foxhall Road	2-8 pm	59
21 st June 2010	Norbreck, Bispham and North Shore Cliffs	The Savoy Hotel, Queens Promenade	2-8 pm	28
24 th June 2010	North of the Town Centre	Claremont First Steps Centre, Dickson Road	2-8 pm	42
28 th June 2010	South of Town Centre	St John's Conference Centre, Cedar Square	2-8 pm	23

Appendix 1b: Area Forum Meetings

Date	Area Panel	Location
5 th July 2010	Sandhurst (Anchorsholme, Norbreck, and Bispham wards)	Methodist School Room, Beaufort Avenue, Bispham
12 th July 2010	Parklands (Layton, Park and Marton wards)	St Mary's Catholic High School, St Walburgas Road
13 th July 2010	Revoe (Bloomfield, Tyldesley, and Victoria wards)	Revoe primary School
14 th July 2010	Cherry Tree (Clifton, Hawes Side and Stanley wards)	Highfield Humanities College, Highfield Road
19 th July 2010	Beacon (Ingthorpe, Greenlands and Layton wards)	Bispham Endowed Primary School, Bispham Road
20 th July 2010	Thames (Highfield, Squires Gate and Waterloo)	Roseacre School
21 st July 2010	Gateway (Brunswick, Claremont and Talbot wards)	Claremont Park Community Centre

Appendix 1c: Number of Responses Received

Area	Questionnaires	Written Responses	Total
General	1	11	12
Norbreck Bispham and Northshore Cliffs	9	20	29
North of the Town Centre	17	5	22
South of the Town Centre	28	24	52
Central Promenade and Foxhall	19	3	22
South Beach	29	6	35
Pleasure Beach	13	7	20
Total	116	76	192

Appendix 1d: Holiday Accommodation Leaflet

Have your say on the future of

Blackpool

and the Resort's Holiday Areas

Blackpool Core Strategy

Holiday Areas Consultation
24th May to 5th July 2010

BLACKPOOL COUNCIL



HOLIDAY ACCOMMODATION
Draft Supplementary Planning Document
May 2010



Holiday Accommodation

Blackpool Council is preparing the Core Strategy to provide a new planning framework for a more prosperous and healthier Blackpool which includes:

- Promoting a 21st century resort and town centre offer
- The regeneration of the resort neighbourhoods
- A more stable and successful holiday sector

Exhibition Dates


See and discuss the proposals at exhibitions in your area:

<p>South Beach: 7th June 2010 St Peter's Church, Lytham Road</p>	<p>Norbreck, Bispham and North Shore Cliffs: 21st June 2010 The Savoy Hotel, Queens Promenade</p>
<p>Pleasure Beach: 10th June 2010 Holy Trinity Church, Dean Street</p>	<p>North of the Town Centre: 24th June 2010 Claremont First Steps Centre, Dickson Road</p>
<p>Foxhall & Central Promenade: 14th June 2010 Blackpool Philharmonic Club, Foxhall Road</p>	<p>South of Town Centre: 28th June 2010 St John's Conference Centre, Cedar Square</p>

All exhibitions run 2-8 pm

(Three pages of information followed – a full copy of the leaflet is available online or from the Council Offices)

Appendix 1e: Holiday Accommodation SPD Comments Form



For Office Use			
Ref No.		Comment No.	
Date Rec.		Acknowledged	

HOLIDAY ACCOMMODATION
DRAFT SUPPLEMENTARY PLANNING DOCUMENT
CONSULTATION

Comments Form: Consultation closes July 5th 2010

- Please use the Council's online Consultation Portal to comment, by visiting the following website:
<http://consult.blackpool.gov.uk/portal>
- You can also send copies of this "Comments Form" by email to:
development.plans@blackpool.gov.uk
- or by post to:
*Planning Department, Development Plans,
Blackpool Council, PO Box 17,
Corporation Street, Blackpool, FY1 1LZ*
- Please make separate comments for each policy or issue you respond to.
- You may photocopy this form, or obtain further copies free of charge from the Council
- You can also print off further copies of this form from the Council's website at:
www.blackpool.gov.uk/corestrategy2010

SECTION 1: Respondent Details

Name

Address

Postcode	Telephone
Fax	Email

If you are completing this form on behalf of someone please complete section 2, otherwise go to section 3

SECTION 2: Agent's Details (if applicable)

Name

Address

Postcode	Telephone
Fax	Email

SECTION 3: Please state precisely which issue you are commenting on

Page/ paragraph number

Please set out clearly your views on each issue you wish to comment on below.

Make as many copies of this sheet as required and attach to the front sheet Sections 1 & 2.

NOTE. Any representation received will be a public document, with details stored on a database, and made available for inspection at the Council's office and via the Council website.

Signature:
Date:

*Please sign and date each form you complete and return or e mail them to the address overleaf by **Monday 5th July 2010.***

If you require any further assistance to complete this form please phone: (01253) 476241.

Appendix 1f: Gazette Notice

BLACKPOOL BOROUGH COUNCIL

**Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Development)
(England)**

**Regulations 2004 (as amended, 2008, 2009)
Draft Supplementary Planning Document (SPD)
Holiday Accommodation**

Blackpool Council has produced a Draft Supplementary Planning Document (SPD), entitled 'Holiday Accommodation' for consultation and public participation purposes under Regulation 17 of the above Regulations. The key aim of the Supplementary Planning Document is to support the holiday accommodation policies of the Blackpool Core Strategy detailing the proposed boundaries of the safeguarded promenade hotel frontages, alongside the six main holiday accommodations areas off the promenade.

The SPD document is available for viewing and download from the Council's website

www.blackpool.gov.uk/corestrategy2010. The document is also available for inspection at the following locations during normal opening hours:

1. Main reception Municipal Buildings, Corporation Street, Blackpool, FY1 1LZ
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

In accordance with Regulation 18, representations on the draft document are welcomed but must be made in writing using one of the following methods:

- 1-by post or email
- 2-by using the SPD Response Form which can be downloaded from the Council Website.
- 3-the Council's online consultation portal -

<http://consult.blackpool.gov.uk/>

Representations should be sent to:

Development Plans Team

PO Box 17

Corporation Street

Blackpool

FY1 1LZ

development.plans@blackpool.gov.uk

Representations may also be accompanied by a request to be notified of the adoption of the SPD.

The deadline for representations is Monday 5th July, 2010

Appendix 2: Review of the Holiday Areas Consultation Responses

2.1 Outlined below are summaries of responses received during consultation from the community and other interested stakeholders, and provide details of the Council Officers' considerations and overall conclusions for the proposed six main holiday accommodation areas and the suggested way forward.

General Comments

2.2 A number of general responses were received from a variety of stakeholders, with more detailed summaries set out in Appendix 3. Due to the specific nature of the SPD a substantial number of agencies and stakeholders had no comment to make, such as the Environment Agency and Highways Agency. More detailed responses were received from the Lancashire and Blackpool Tourist Board, English Heritage, Bourne Leisure Ltd., and local estate agents Kenrick and Co.

2.3 The Lancashire and Blackpool Tourism Board supports the proposed strategy, with general agreement on the proposed boundaries with the exception of the South Beach area, suggesting Alexandra Road be considered within this area. The Lancashire and Blackpool Tourism Board would also like to see significantly higher levels of accreditation within the defined holiday accommodation areas.

2.4 English Heritage supports the aims of the document to improve the quality of holiday accommodation and suggest the SPD refers in more detail to the character of the individual main holiday accommodation areas.

2.5 Bourne Leisure Ltd., who own and operate the Marton Mere Holiday Village in Blackpool, comment that support should be given to the SPD to ensure a range of tourism accommodation is provided and to enhance existing tourism and accommodation facilities, in order to ensure that Blackpool becomes a unique year round twenty first century resort. In addition, Bourne Leisure consider that existing holiday areas outside the six defined areas should also be identified as important holiday areas and suggest planning policy should be provided for holiday parks in both the Core Strategy and SPD.

2.6 Kenrick and Co., independent estate agents based in Blackpool, contend that the de-regulation of the holiday area is flawed, citing it is not commercially viable to convert medium sized hotels in to a single residency and additionally raise concerns regarding HMOs and the saleability of holiday accommodation outside the proposed main holiday accommodation areas.

2.7 The general comments received demonstrate a wide range of views on the holiday accommodation SPD, combining a mix of support for the proposals but also concerns regarding the potential implications of the proposed changes. With the exception of the Lancashire and Blackpool Tourism Board and Bourne Leisure Ltd, many of the general comments however propose little in the way of amendments or alternatives to the proposed policy approach or boundaries.

Norbreck, Bispham and North Shore Cliffs

- 2.8** Representations received regarding the proposed Promenade and main holiday accommodation areas in Norbreck, Bispham and North Shore Cliffs were varied, with a number of responses in support of the proposals. However, concerns were raised regarding the omission of two particular streets in the area, *Gynn Avenue* and *Wilshaw Road*.
- 2.9** A number of responses were received from *King Edward Avenue*, which were generally supportive of the proposed boundary and the need to reduce the number of holiday accommodation premises, particularly those of a low standard, combined with the need to provide a strong policy framework to address the issue of problem HMOs in the surrounding area.
- 2.10** Three responses were received from Wilshaw Road and expressed the opinion that the street should be part of a main holiday accommodation area, namely because of the proximity to Gynn Gardens and seafront, the prominence of holiday accommodation in this cluster of properties and the largely retained Edwardian character of the properties.
- 2.11** A substantial number of representations were received from Gynn Avenue, which were in disagreement with the omission of the street from the proposed holiday areas. The responses proposed that Gynn Avenue should be included in the main holiday accommodation areas because, amongst other reasons, the street is dominated by characterful holiday accommodation offering a great number of accredited properties within a quiet location that is attractive to the senior and family markets.
- 2.12** Responses were also received from *King George Avenue* and *Holmfield Road*, which were supportive of the policy approach. In addition, one representation was received from *Queens Promenade* which agreed with the policy approach and the proposed boundaries in Norbreck, Bispham and North Shore Cliffs. No other representations were made regarding the proposed Promenade Key Hotel Frontages or Main Holiday Accommodation Promenade Frontage.
- 2.13** In conclusion, responses received from the Norbreck, Bispham and North Shore area suggested a general acceptance of the existing boundaries but with the addition of Gynn Avenue and also some support for Wilshaw Road.
- 2.14** Following the significant support for the inclusion of Gynn Avenue in the Norbreck, Bispham and North Shore Cliffs area, it is recommended that this street is to be included within the main holiday accommodation area. The high proportion of properties in holiday use on Gynn Avenue provides the council a strong basis to resist planning applications to convert properties to residential use and safeguard the existing holiday accommodation use on much of this street.
- 2.15** Whilst Wilshaw Road has received some level of support to be included in the proposed main holiday accommodation area, it is considered that due to the already mixed-use nature of the street it would not be possible for the Council to continue to safeguard the area in holiday accommodation use. A number of properties have already converted to residential use and it is considered that such uses would not have a detrimental impact on the street or the overall ambience of the Gynn Square area. It is therefore recommended Wilshaw Road remains outside the Norbreck, Bispham and North Shore Cliffs main holiday accommodation area.

North of Town Centre

- 2.16** *Banks Street, Pleasant Street* and *Dickson Road* were identified in consultation responses as streets to be included within the proposed holiday areas. The inclusion of some sections of *Lord Street* were questioned due to the concentration of permanent residential use in the centre of the street.
- 2.17** Opinions over the inclusion of Lord Street in a main holiday accommodation area were varied. In responses received from Lord Street there was some agreement there is too much holiday accommodation and there are issues over the existence of HMOs and mixed neighbourhoods, but agreement that the proposed policy approach was generally the right way forward. However, there was also an opinion that there was little benefit to being in a holiday area and that other streets would be much better suited to inclusion in a main holiday accommodation area.
- 2.18** There was a substantial response made regarding the proposed exclusion of Banks Street from the main holiday accommodation areas. In general, there was an agreement that there is too much holiday accommodation in Blackpool but the proposed boundaries in some areas should be reconsidered. Numerous reasons were put forward to support Banks Street (to the west of Dickson Road) to be part of the safeguarded holiday areas, the street was identified by respondents as a long established holiday accommodation area that is still predominantly in holiday use, containing a number of accredited properties, with a large proportion of the proprietors on Banks Street currently having no desire to convert to residential use.
- 2.19** A small number of responses were received from Dickson Road with the perception that the road should be included in a main holiday area due to the proximity to the Promenade and also the proposed Talbot Gateway scheme. There was agreement that there is currently too much run-down and poor quality holiday accommodation on offer, which are having a detrimental effect on surrounding businesses, which in some cases have heavily invested in their properties.
- 2.20** The overall support to include Dickson Road in the holiday areas was generally very low, and from a planning perspective it would be very difficult to safeguard Dickson Road as a holiday area when the street is largely in mixed use already. The importance of Dickson Road as a gateway in to the resort is however recognised and is reflected in Policy R17: Key Resort Gateways of the Blackpool Preferred Option Core Strategy, which supports the comprehensive improvement and radical restructuring of Dickson Road and also Central Drive and Lytham Road.
- 2.21** Responses were also received from *Cocker Street* and *General Street*, which supported the policy approach and proposed boundaries with agreement that there is too much poor quality holiday accommodation but also too many problem HMOs which need addressing.
- 2.22** Support was provided for the inclusion of Pleasant Street, between Dickson Road and Braithwaite Street, from two respondents. This section of Pleasant Street is identified as containing five holiday accommodation properties of which three are accredited, and operate all week and all year round rather than solely at weekends, appealing to couples, seniors, families and gay visitors.
- 2.23** In conclusion, the responses suggest that sections of Lord Street should be removed from the proposed North of Town Centre main holiday accommodation area, and for Banks Street west of Dickson Road, and Pleasant Street between Dickson Road and Braithwaite Street to be included.
- 2.24** In response to the consultation representations, it therefore recommended to remove the section of Lord Street between Banks Street and Yates Street from the North of Town main

holiday accommodation area. The reason for this is the substantial concentration of residential properties fronting this section of Lord Street and as such it would be inappropriate to safeguard this area for continued holiday accommodation use.

- 2.25** Following the strong support for the inclusion of Banks Street, west of Dickson Road, it is recommended to include this section in the North of Town Centre main holiday accommodation area. This section of Banks Street is dominated by properties in holiday accommodation use, combined with a strong desire by current proprietors to remain in such use, and as such it is recommended that applications for change of use in Banks Street could be resisted by the Council.
- 2.26** The inclusion of Pleasant Street was proposed, however it is recommended this section is not included in the North of Town Centre main holiday accommodation area due to the general mixed-use nature surrounding and within the small cluster of holiday accommodation properties on Pleasant Street.

South of Town Centre

- 2.27** The focus of responses for the South of Town Centre area were received from *Reads Avenue* and *Palatine Road*, with representations also from *Havelock Street*.
- 2.28** Strong representations were made from a cluster of proprietors on the western end of Reads Avenue. Comments from Reads Avenue varied, with some support for increased flexibility enabled by the SPD but also suggestions that there should be no boundaries, based on the premise that good businesses would survive and the poorly performing ones would disappear, however only with the implementation of the *New Homes from Old Places* document.
- 2.29** Overall, however, representations from Reads Avenue were generally in objection to its proposed exclusion from the main holiday accommodation area, describing it as a viable, strong trading road containing well-maintained properties, with a number nationally accredited, centrally positioned and providing a main arterial route in to Blackpool. Concerns were raised in relation to the perceived negative impacts generated by a number of problem HMOs on the road. Consequently, there is recognition that for the proposed approach to work there is the need for the *New Homes from Old Places* document to be adopted at the same time and fully implemented and enforced.
- 2.30** Palatine Road was additionally put forward as an area to be included in the South of Town Centre main holiday accommodation area, with the rationale largely placed on the centrality of the road to all locations and key attractions, and the number of accredited properties. Overall, a number of representations received regarding Palatine Road were critical of the proposed approach, however offered little in way of an alternative other than to focus on accredited properties.
- 2.31** Ward Councillor representations also put forward the case for the inclusion of Reads Avenue, Palatine Road and small sections of *Coronation Street* in the South of Town Centre main holiday accommodation area. Emphasis was placed on the number of accredited properties on the streets and the role of Reads Avenue and Palatine Road as main arterial routes into the holiday accommodation areas.
- 2.32** Responses also came forward regarding the exclusion of Havelock Street from the South of Town Centre main holiday accommodation area. Havelock Street was described as a small but busy street in a central location which has been operating successfully for many years and benefits from regular return visitors.
- 2.33** An individual representation was received regarding the exclusion of *Leopold Grove*, with the key reasons for inclusion based on accreditation and attracting repeat bookings. A representation received from *Hornby Road* supported the approach and boundaries but suggested that the Council should purchase hotels outside the holiday areas and assist owners to purchase hotels in the holiday area.
- 2.34** Overall, representations were focused on the exclusion of Reads Avenue, Palatine Road, Havelock Street and small sections of Coronation Street from the proposed South of Town Centre main holiday accommodation area, with limited response received from, or referring to, the streets within the proposed holiday area.
- 2.35** The general support and desire for the wider South of Town Centre area to remain in holiday use is evident, however the reality is that streets located further from the town centre demonstrate some level of decline in holiday use, which has given way to some residential use in streets such as Reads Avenue and Palatine Road. The presence of these other uses within the streets reduces the Council's ability to confidently safeguard holiday use in these streets.

- 2.36** Away from the Promenade the highest concentration of holiday accommodation is located to the south of the Town Centre, where the scale and intensity of the holiday premises is particularly significant in Adelaide Street and Albert Road. Located in a prime town centre location and of a similar scale and character as a many of the larger Promenade hotels, the holiday premises in Adelaide Street and Albert Road are well positioned to complement and benefit from future town centre redevelopment, including expansion of the Hounds Hill Shopping Centre and remodelling of the Winter Gardens.
- 2.37** Away from Adelaide Street and Albert Road, as with elsewhere in the resort, some level of contraction in holiday use has occurred south of the Town Centre, however this is concentrated in the streets furthest from the town centre, evident in streets such as Reads Avenue, Palatine Road, and Havelock Street. The sheer number of holiday accommodation premises in this area, and existing residential uses, renders it impractical to safeguard too wide an area.
- 2.38** However, in recognition of the strong support by a number of hoteliers and the strength of the holiday accommodation offer on certain sections of Reads Avenue and Palatine Road, the proposed South of Town Centre main holiday accommodation area is recommended should be extended to include sections of these streets.
- 2.39** The position for Coronation Street remains the same as initially proposed, in that the street will not be included in the main holiday accommodation area. It is acknowledged that there are two small clusters of properties in holiday use, however much of the street is otherwise dominated by commercial and retail uses creating a mixed use street, similar to roads such as Dickson Road and Lytham Road. Similarly, it is also recommended that Havelock Street will also remain outside of the proposed South of Town main holiday accommodation area as initially proposed, largely due to the substantial proportion of properties in residential use on the street.

Central Promenade and Foxhall

- 2.40** The responses received from the Central Promenade and Foxhall area had a strong focus on the future of *Tyldesley Road*. At the time of consultation the future of funding for the proposed remodelling of Foxhall, and in particular Tyldesley Road, was under review as a result of the current spending review – but is not part of this consultation. In terms of the Holiday Accommodation SPD, responses received from Tyldesley Road were in general support of the need to reduce the amount of holiday accommodation on offer and also supported the proposed boundaries, however concerns were raised regarding the potential of mixed neighbourhoods.
- 2.41** Individual responses from *York Street* and *Bairstow Street* were received and agreed with the proposed approach and boundaries, with a view that the proposed reduction in holiday accommodation will enable the remaining businesses to run at a profit and to subsequently reinvest in buildings.
- 2.42** A small number of responses were received from *Blundell Street*, *Dale Street* and *Princess Street*, which provided overall support for much of the proposals however concerns were raised regarding whether mixed neighbourhoods would work, combined with reservations about the practicality and feasibility of converting properties designed solely for holiday accommodation use into residential properties.
- 2.43** Representations received from *Rigby Road* generally agree with the proposed approach, however suggestions were put forward that the proposed holiday area in Foxhall is incorrect as the streets identified are set back from the Promenade, with streets such as Rigby Road identified as more suitable locations which attract greater numbers of visitors due to their position as major transit routes.
- 2.44** The proposed main promenade holiday accommodation area on the *Central Promenade* received only one representation from outside the proposed boundary, which was supportive of the proposed approach and boundaries of the holiday areas.
- 2.45** In conclusion, the boundaries proposed in the draft SPD were largely accepted in the responses received from the Foxhall area, however questionnaires received from elsewhere indicated an overall disagreement regarding the Foxhall boundaries. Whilst a number of responses contested the proposed Foxhall boundaries, very few, if any, alternative streets or boundaries were suggested for the Foxhall main holiday accommodation area. Consequently, it is recommended the main holiday accommodation area remains the same as initially proposed.
- 2.46** An additional section of main holiday accommodation promenade frontage is proposed between Manchester Square and Trafalgar Road, this section was initially omitted to complement the proposed remodelling of the Foxhall area. Due to current spending reviews, however, there are uncertainties, as with many projects across the country, regarding the future and scale of redevelopment in Foxhall, and as such it is therefore recommended that this section of the Promenade be included as part of the Main Holiday Accommodation Promenade Frontage.

South Beach

- 2.47** The focus of representations received in relation to the proposed South Beach main holiday accommodation area were in relation to the exclusion of *Alexandra Road*, *Lonsdale Road* and *Crystal Road* from the proposed holiday area.
- 2.48** Responses were received from six properties on Alexandra Road, with one written representation sent on behalf of 13 properties, which generally agreed with the need to reduce holiday accommodation numbers and the proposed approach apart from the proposals for mixed neighbourhoods but expressed concerns regarding its exclusion from the main holiday accommodation area. A general desire for the inclusion of Alexandra Road in the holiday areas was put forward, with the road described as a main holiday destination in South Shore, providing a good location for local attractions and offering a number of accredited and well maintained properties with examples of retained Victorian architecture.
- 2.49** Opinion regarding Lonsdale Road was more split with some responses suggesting the road should be included in the proposed main holiday accommodation areas, but a number of responses also supported the exclusion of Lonsdale Road, referring to its proximity to the central corridor coach and car park, and to the now 'Premier League' football ground.
- 2.50** Representations were received from four properties on Crystal Road accepting the need for a reduction in holiday accommodation and supportive of better quality and accredited properties, but do not agree with the proposed policy approach, with some support for no main holiday accommodation areas.
- 2.51** Mixed responses were received from a small number of properties on *Shaw Road*, particularly regarding the proposed exclusion of the street, with some in support and others in opposition. However, there was unanimous concern regarding mixed neighbourhoods, largely as a result of issues that have arisen in the street from residential properties.
- 2.52** A number of individual responses were also received from *Wellington Road*, *St Chad's Road*, *Lytham Road*, *Moore Street*, *Kirby Road* and *Amberbanks Grove*.
- 2.53** From all the responses received from the South Beach area, the main areas of contention were the exclusion of Alexandra Road and Lonsdale Road from the main holiday accommodation area and from Crystal Road the perception that there should be no specific main holiday areas in a resort town such as Blackpool.
- 2.54** In response to the representations received, it is recommended to include Alexandra Road in the South Beach main holiday accommodation area. Overall, the street is largely in holiday use and is to some extent bucking the trend from elsewhere in the resort, with examples of recent and significant upgrading of existing holiday accommodation and an evident community desire for inclusion which both strengthen the street as a holiday area. The Lancashire and Blackpool Tourism Board also support the inclusion of Alexandra Road within the main holiday accommodation area due to the good level of accredited properties in the street.
- 2.55** It is regarded that the mixed response received from Lonsdale Road indicates there is little consensus from residents and property owners on the road as to the way forward, which is in contrast to other streets such as Alexandra Road where all responses objected to the removal from the holiday area. Consequently, it is recommended that Lonsdale Road will remain outside of the main holiday accommodation area.

Pleasure Beach

- 2.56** Responses from the Pleasure Beach area were focused on four main streets, *Dean Street*, *Station Road*, *Withnell Road* and *Osborne Road*, including 14 written representations and two petitions.
- 2.57** The petition submitted for Withnell, Station and Osborne Road and surrounding area suggests the area should be included in the main holiday accommodation area because of the high footfall in the area generated by visitors walking to the Promenade from car parks, and that the guest houses provide accommodation for visitors which cannot afford 4 or 5 star accommodation. In total, the petition contained 114 signatures from the surrounding area.
- 2.58** Individual responses from eight properties on Osbourne, Withnell and Station Road were received and provided a varied response but were overwhelmingly concerned with the proposed mixed neighbourhood approach and disagreed with the reduction of the Pleasure Beach holiday area and the proposed boundaries, particularly the exclusion of the three streets to the north of Bond Street. Responses received described the streets as the main walkways from the central corridor car park to the Pleasure Beach and Sandcastle Water Park, which generates passing trade for guest houses. Responses also suggested that some proprietors had invested large amounts of money into businesses, with a number of properties achieving national accreditation, and a belief that the traditional guesthouse can and will prosper.
- 2.59** Representations from four properties and a petition were received regarding the exclusion of Dean Street from the proposed Pleasure Beach main holiday accommodation area. The responses suggested an overall agreement with the need to reduce holiday accommodation numbers and with the proposed approach, however the precise boundaries were disputed. The responses suggested that Dean Street is at the forefront of the accommodation area, particularly in light of recent announcements regarding future investment in the Pleasure Beach, which may attract further visitors to the area.
- 2.60** Pleasure Beach Limited supports the proposals for the promenade and suggest the creation of six main holiday accommodation areas away from the promenade is a reasonable response to the changing holiday market. Support is given for the promotion of the replacement of low quality older holiday accommodation and the development of new or improved visitor accommodation, and consider the 'managed retreat' in other locations will improve the viability of hotels in the designated areas. The Pleasure Beach outlines an aspiration to develop further on-site accommodation which would act as a further catalyst to the upgrading and redevelopment of hotels elsewhere in Blackpool, and request the Core Strategy to support further high quality hotel development at the Pleasure Beach.
- 2.61** The focus of responses received from the Pleasure Beach area were concerning the exclusion of Dean Street and Station, Withnell and Osborne Road east of Bond Street from the proposed main holiday accommodation area.
- 2.62** From consultation, it is clear there is a strong business and community desire for the inclusion of Dean Street, west of Bond Street, to be included in the Pleasure Beach main holiday accommodation area, which is complemented by the strong concentration of holiday premises in the street providing the Council with a strong basis to resist future proposals for change of use. It is for these reasons that the inclusion of Dean Street, west of Bond Street, in the Pleasure Beach main holiday accommodation area is recommended.
- 2.63** Station, Withnell, and Osborne Roads were the focus of a sizeable petition seeking inclusion for the length of the roads within the Pleasure Beach main holiday accommodation area, demonstrating an evident desire for the continuation of holiday accommodation use in this wider area. The Council is encouraged by this strong support, however the reality is that the three roads north of Bond Street already demonstrate characteristics of mixed

neighbourhoods, with a strong element of residential use in the roads. As a result, it would not be realistic for the Council to continue to safeguard holiday accommodation use in this area, consequently it is recommended that Station Road, Withnell Road and Osborne Road east of Bond Street will not be included in the Pleasure Beach main holiday accommodation area.

- 2.64** Following further evaluation of the proposed holiday accommodation areas, it is apparent that within the proposed Pleasure Beach main holiday accommodation area small sections contained a mix of uses where it is deemed holiday accommodation use could not be safeguarded and as such should be removed from the proposed holiday area. It is therefore recommended to remove much of Balmoral Road (between Bond Street and the Blackpool South Travelodge), the south side of Osborne Road and the south side of Station Road from the Pleasure Beach main holiday accommodation area.
- 2.65** South of Station Road is largely dominated by commercial, retail and residential uses and therefore does not warrant or require the safeguarding of holiday accommodation uses. Properties on Balmoral Road are predominately in use by the Pleasure Beach and do not provide holiday accommodation, the exception to this is the Blackpool South Travelodge which would remain in the Pleasure Beach main holiday accommodation area.
- 2.66** The south side of Osborne Road does contain a very small number of holiday premises however this is outweighed by properties in residential use, therefore in planning terms the Council is unlikely to be able to resist proposals for change of use from holiday accommodation to residential on the south side of Osborne Road.

APPENDIX 3

Appendix 3a: Summary of Public Consultation Community Responses

Name/Consultee	Address	Date Received	Holiday Area	Summary of Response
Lyn & Brian Johnson	King George Avenue	25.05.10	Norbreck, Bispham and North Shore Cliffs (NSC)	Concerns regarding current problem flats in the area and also the possibility of further bedsits and flats occurring as a result of the SPD. Concerns that properties outside the proposed holiday areas will be more difficult to sell. Hoteliers on the road work hard to maintain properties to try to attract visitors.
Mr & Mrs Gear	Wilshaw Road	26.06.10	NSC	<p>Object to the proposed boundaries and suggest that Wilshaw Road should be included. Have gone to great lengths to improve property and have achieved AA 4 Star rating.</p> <p>Accommodation on Wilshaw Road is generally of a high standard. In the past change of use to residential has been resisted by the Council.</p> <p>Gynn Square considered to be a showpiece for the Promenade and it should be again.</p>
Gynn Avenue Appeal	Gynn Avenue	28.06.10	NSC	<p>Strongly object to the proposed boundaries set out in the Holiday Accommodation SPD, and suggest that Gynn Avenue should be included in a Main Holiday Accommodation Area. Reasons put forward for the inclusion of Gynn Avenue include:</p> <ul style="list-style-type: none"> • Of the 24 hotels and guesthouses 13 premises are in the star-rating scheme. • Bedspace numbers in the street have already reduced to provide extra facilities and space. • Investment in properties. • Concerns that mixed streets do not work. • Where possible the original character of properties have been retained, with many properties dating between 1890 – 1910. • Attract many return visitors, with the quiet location appealing to families and elderly visitors.
Mr & Mrs Norris	Gynn Avenue	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas. Invested a considerable amount of time money into the business and have maintained a four star rating.</p> <p>Chose to buy a property in Gynn Avenue as it is a prominent holiday area that has a long history. Concerns that if Gynn Avenue is no longer in the resort neighbourhoods they will no longer be able to run a successful business.</p> <p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but do not agree that Gynn Avenue should be removed as it is a thriving holiday area with many thriving businesses.</p>
M & P Collinge	Gynn Avenue	28.06.10	NSC	Strongly object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Susan Doherty	Gynn Avenue	28.06.10	NSC	<p>Concerns that their livelihood is being taken away and that achieving accreditation has not mattered.</p> <p>Strongly object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Concerns regarding mixed neighbourhoods, with the perception that they are to be forced to live in such an area.</p> <p>Gynn Avenue was in the holiday area and there was no mention of it ever coming out.</p>
Pat & Ken Maughan	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p>
Mr. & Mrs. Randall	Gynn Avenue	28.06.10	NSC	<p>Understand the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Areas like Gynn Avenue should be promoted and remove areas that are run down from the holiday areas.</p> <p>Currently three star accredited but were going for four star accreditation, but feel that if removed from the main holiday accommodation areas there will be no point in applying.</p>
Steve Woodhead & Dawn Redfearn	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>When looking for a business aware of the areas with its prominent position so close to the seafront, Gynn Gardens and tram/bus routes and that it was in the business area (Resort Neighbourhoods).</p>
Mr. & Mrs. Whittaker	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p>
Lin & Dave Weatherall	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Over the past 20 years built up a very good business with many return visitors, due in part to proprietors and quiet location ideally situated off the seafront.</p>
William Scott	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>During the past five years Rosdene House has achieved four-star silver accreditation with Visit Britain.</p>
Mark & Diane Horler	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>When looking for a business aware of the area with its prominent position so close to the seafront, Gynn Gardens and tram/bus routes and that it was in the business area (Resort Neighbourhoods).</p>
Mr. & Mrs.	Gynn	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Houldsworth	Avenue			Invested a lot of time and money into the property and have confidence in Gynn Avenue as a holiday area. Gynn Avenue is a thriving holiday area, with lots of properties as thriving businesses and owners who have invested in their properties and the area.
Delwyn & Sylvia Hinds	Gynn Avenue	28.06.10	NSC	<p>Feel that the Council have already decided to remove Gynn Avenue but have not produced evidence that proves Gynn Avenue is any detriment to the holiday industry.</p> <p>Own and manage a four star guesthouse trading year round with 90-95% occupancy, based on repeat visits.</p>
Christine Daly	Gynn Avenue	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Emphasises that Gynn Avenue currently has 6 four star and 7 three star accredited properties, and that hoteliers have worked alongside each other to maintaining high standards.</p>
	Gynn Avenue	28.06.10	NSC	<p>Fully aware of the reasons for reducing the high volumes of bed spaces in Blackpool but objects to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>When looking for a business aware of the areas with its prominent position so close to the seafront, Gynn Gardens and tram/bus routes and that it was in the business area (Resort Neighbourhoods).</p>
Janet Jones	Gynn Avenue	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Take part in many schemes and accredited. The avenue works hard together and feel that the proposed approach will affect businesses.</p>
Mr. & Mrs. Bowen- Thomas	Gynn Avenue	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>Need avenues such as Gynn Avenue to promote the traditional guesthouses as a focal part of Blackpool's heritage and providing an alternative to modern Holiday Inns.</p> <p>Provide quality premises and services specifically aimed at family and couples market.</p>
Mr. R. Lockhart	Gynn Avenue	28.06.10	NSC	<p>Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas.</p> <p>When looking for a business aware of the area with its prominent position so close to the seafront, Gynn Gardens and tram/bus routes and that it was in the business area (Resort Neighbourhoods).</p>
Carol & Jeff Morris	Wilshaw Road	07.07.10	NSC	<p>Object to the exclusion of Wilshaw Road from the main holiday accommodation areas.</p> <p>Suggest that Wilshaw Road should be included in the holiday accommodation areas because:</p> <ul style="list-style-type: none"> • All trading hotels are accredited. • Properties retain character. • Whole road is holiday accommodation. • Proximity to Gynn Gardens makes it a very attractive area.

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				Concerns raised that investment and marketing will only be targeted at the proposed main holiday accommodation areas.
Alan Smith	Banks Street	26.06.10	NTC	<p>Lobbying for Banks Street, specifically the area from Dickson Road down to the Promenade, to be included in the holiday area.</p> <ul style="list-style-type: none"> • Banks Street has a well known holiday history and there are many hotels which only lend themselves to being hotels as opposed to other residences because of their size. • These hotels have a good holiday trade. • Many hotels have been upgraded in line with increased customer expectations.
Richard de Longa	Pleasant Street	04.07.10	NTC	<p>Propose that the Lord Street area should be extended to include Pleasant Street, between Dickson Road and Braithwaite Street for the following reasons:</p> <ul style="list-style-type: none"> • Lord Street contains a large section of residential properties, whereas this section of Pleasant Street is almost entirely holiday accommodation. • Lord Street is said to have a 'gay-friendly' identity however there are more gay-owned hotels and guesthouses in the immediate surrounding area. This section of Pleasant Street has two gay guesthouses with well established gay clientele. • It is the many gay bars and clubs and the two gay saunas that have resulted in the growth of the gay quarter not Funny Girls. • Levels of accreditation on Lord Street are low but three out of five guesthouses are accredited on Pleasant Street. • Much of the accommodation on Lord Street is only open at weekends, whereas guesthouse on Pleasant Street are open all week and all year round. • Pleasant Street has its own niche market, appealing to gay visitors and mature couples. It is much quieter than central resort, yet adjacent to the promenade and within easy walking distance from the major attractions.
Philip Brown	Pleasant Street	05.07.10	NTC	<p>Under the proposals of R19: Main Holiday Accommodation Areas, the protected Lord Street area would end at Mount Street. Believe that this should be extended to include Pleasant Street from Dickson Road to Braithwaite Street.</p> <ul style="list-style-type: none"> • Within this area there are currently 5 guest houses, 3 of these are nationally accredited. • They trade throughout the year and seven days a week from April to November, which ensures that they are viable and sustainable businesses. • Provide for an established clientele, couples, families, seniors, small groups, visiting gay community, and business visitors. • Within 100m of the Promenade and walking distance of the town centre, train and bus stations and many

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				<p>Lord Street, in comparison, has a number of permanent residences or are not trading, with some relying on the stag and hen market.</p> <p>Believe that Pleasant Street is a core part of the accommodation sector and need to be encouraged and protected.</p>
Alan Smith on behalf of the Banks Street (West) Hoteliers Group	Banks Street	25.07.10	NTC	<p>Requests the council not to proceed with the proposed exclusion of businesses on Banks Street from Dickson Road to the Promenade from the defined holiday area.</p> <p>Petition containing 16 signatures from 10 properties on Banks Street.</p>
Alan Smith on behalf of the Banks Street (West) Hoteliers Group	Banks Street	04.08.10	NTC (North of the Town Centre)	<p>A case for the part of Banks Street between Dickson Road and the Promenade to be included in the main holiday accommodation areas.</p> <p>Suggest that Banks Street should be included in the holiday accommodation areas because:</p> <ul style="list-style-type: none"> • Banks Street lies in North Beach, adjacent to North Promenade, close to major hotels and within 3000 meters of North Pier. It is central to the main tourist areas. • 17 hotels which are all trading. • Significant investment has gone into the properties. • Level of booking will ensure that these hotels continue to trade and that they have a future. <p>Hope the council will support Banks Street wherever possible to ensure that the holiday sector in this part of North Beach continues to prosper.</p> <p>Recognise that the entrance to the street from the Promenade could do with improvement.</p> <p>Wish to emphasise that Banks Street is not generally in mixed-use and is not currently blighted with HMOs etc.</p> <p>Hoteliers have no intention of operating in any other way than at present and certainly do not want the 'freedom' to convert to other uses.</p> <p>Concerns that when hoteliers wish to sell there are concerns that banks will not view favourably the provision of finance to hotels outside of the defined holiday area.</p>
Councillors Ron and Gary Bell	Town Hall, Blackpool	05.07.10	South of the Town	<p>General consensus that there is an oversupply of beds in the town but question whether the figure is realistic. The Council's own more recent figures show a reported upward trend in visitor numbers.</p>

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			Centre (STC)	<p>Concerns regarding the conversion of hotels or guest houses in to HMOs as existing preventative measures have done little or nothing to combat this problem. Concerns that some quality hotels and guest houses are outside the proposed holiday areas.</p> <p>Must be a solution available that capitalises on the assets we have by retaining the existing quality accommodation and allow them to operate without fear of their trading position being blighted by substandard neighbouring properties.</p> <p>The Town Centre area proposal is well balanced with the exception of the exclusion of Palatine Road, Reads Avenue West and small numbers of properties around Coronation Street.</p> <p>Do not know how successful this strategy will be and that being the case and in the view it would seem foolish to remove Palatine Road, Reads Avenue and parts of Coronation Street from the holiday area when there is a likelihood the accommodation may be needed in the future.</p> <p>Ask that both Palatine Road, Reads Avenue to the west of Park Road and the other very small number of properties around Coronation Street.</p>
Ann & Terry O'Donnell	Leopold Grove	21.06.10	STC	<p>Achieved 2 star accreditation and have invested money in to the business but are now outside the proposed holiday area.</p> <p>It would be fairer to help those that have kept up with regulation and repairs to be helped financially to upgrade.</p> <p>Property is too large to convert into a family home, therefore preventing us from selling our business to be able to retire comfortably. Would require help to change use.</p>
P.A. Langstone	Palatine Road	24.05.10	STC	<p>Concerns regarding the exclusion of Palatine and Reads Avenue from the proposed holiday area. Believe it is unfair to people who have spent thousands of pounds to build up thriving small businesses to be pushed aside with no concerns for our futures or property values.</p>
David Passingham and Allan Preece	Palatine Road	18.05.10	STC	<p>Object to the Core Strategy and Supplementary Planning Document.</p> <p>Upgraded property and attained a 3 star rating from Visit Britain. Concerns that property values will drop as a result of the proposals, and will result slum dwellings.</p>
Elizabeth J Barnes	Palatine Road	13.05.10	STC	<p>Object to the Supplementary Planning Document. Suggest it is not in the interest of the business to be removed from the holiday area.</p> <p>Questions whether the proposals affect business rate payment</p>
Lorraine and Stewart Lambert	Palatine Road	06.05.10	STC	<p>Object to the Core Strategy and Supplementary Planning Document.</p> <p>Spent a lot of money on our hotels and Blackpool Council even helped with the 'Invest in Blackpool' scheme</p>

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Mr A Dickens and Mrs R Dickens	Palatine Road	04.05.10	STC	to help gain accreditation. Object to the Supplementary Planning Document. Have been in Palatine Road for many years and receive plenty of repeat trade. State that Palatine Road and Reads Avenue are located near to the Central Pier, central for the town centre. Concerns Blackpool will end up full of one night lodge accommodation not the premier family resort should be.
G H Smith	Palatine Road	04.05.10	STC	Object to the Supplementary Planning Document. Lived on Palatine Road for many years and it is still a thriving holiday area. Palatine Road and Reads Avenue are central to all attractions in Blackpool.
Pauline Bibb	Palatine Road	26.04.10	STC	Protest to the proposal to remove Palatine Road from the holiday area.
Chris and Lilian Wood	Palatine Road	29.04.10	STC	Strongly opposed to the Supplementary Planning Document. Concerns that hoteliers that have invested heavily in upgrading and maintaining properties will see this hard work and investment eroded. Concerns the surrounding areas will be open to 'undesirables, gangs of drunken yobs, music playing youth at all times of the day and night, drug takers, prostitutes and the likes'. Reducing the holiday areas will put at risk the shop owners, working men's clubs and other tourist related industries. The whole resort will suffer not just the areas proposed to be outside the holiday areas. Concerns that mixed communities will received media attention and any bad publicity has a disastrous effect on any economy. Concerns that no one will buy a hotel with no future prospects, regardless of the quality, and the re-sale value of properties. Instead of new hotel developments, the way forward would be to make all accommodation providers meet minimum accreditation standards before they are allowed to trade.
Chris Wood	Palatine Road	24.05.10	STC	Concerns that accommodation providers in the holiday areas may be given grants for improving their properties, and will be able to gain accreditation without a great deal of expense. We are outside the proposed holiday area but have invested heavily on both property upgrading and gaining accreditation. Do not want to be residential, we want to be hoteliers.
David and Jill Curtis	Palatine Road	14.05.10	STC	Object to the Supplementary Planning Document. Owners of guest houses and hotels have been encouraged to upgrade their accommodation, to find the properties are proposed to be removed from the holiday area. The streets that are removed from the holiday areas a likely to be targets for HMOs and derelict properties.,

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				<p>concerns that the council are unable to control now before any permanent changes have been made.</p> <p>Concerns with the proposed removal of Palatine Road and Reads Avenue from the holiday area, when they are close to the Town Centre, Promenade and Central Pier.</p> <p>Concerns with the building of Travel Lodges and Premier Inns, when the SPD states that there are too many bedspaces in Blackpool. Also concerns that this will be putting many small establishments on a very insecure footing.</p>
Terence Samuels	Reads Avenue	05.07.10	STC	<p>Agree with the Holiday Accommodation SPD, stating there are too many guest houses in Blackpool and should be allowed to return to residential if wished.</p> <p>Suggest hoteliers and guest house owners cannot afford to refurbish and are unable to sell. To revert to residential would enlarge the market to who they could sell. Also, a lot of properties are unsuitable to be upgraded to national accreditation.</p>
Chris Mulley	Reads Avenue	06.07.10	STC	<p>Preference would be to have no boundaries, as this will allow the ones which that wish to discontinue to do so. Good businesses will survive and bad ones will disappear. However this will only work if the 'New Homes from Old Places' document is implemented at the same time to raise standards and avoid HMOs.</p> <p>Suggests the lower half of Reads Avenue should be included if the holiday areas were to be put in place, describing Reads Avenue as a viable, strong trading road, positioned to benefit from any development at the former Central Station site. Properties are well maintained with a number accredited.</p>
Mr and Mrs Allott	Reads Avenue	11.05.10	STC	<p>Object to the removal of Reads Avenue from the proposed holiday area. Concerns that the proposals may affect property values and the conversion of holiday accommodation properties into family homes would be too costly, with the potential for an increase in the number of HMOs.</p> <p>Suggest that many properties on Reads Avenue are accredited and have good return business and feel let down by the proposed exclusion.</p> <p>Questions why there are plans for new build hotels when the council is wanting to shed bedspaces? When were plans for the new holiday area proposed? Why encouraged to attain national accreditation if not included in the protected holiday area?</p>
Harry Dunbar	Reads Avenue	07.05.10	STC	<p>Object to the proposed exclusion of Reads Avenue from the propose holiday area. Concerned the proposal will lead to devaluation of holiday accommodation; create uneven marketing opportunities; cause a decline in customers seeking accommodation in Palatine Road and Reads Avenue; and produce a growth in poor quality HMOs.</p> <p>Suggests the proposals for mixed neighbourhoods demonstrates a lack of understanding of the social problems linked to such schemes, with a potential correlation between current crime trends and poor quality HMOs.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Ray and Caroline Harley	Reads Avenue	05.05.10	STC	Object to the exclusion of Reads Avenue from the proposed holiday area. Raises concerns that the number of HMOs will increase leading to a reduction in visitor numbers to the area. Reads Avenue is in a central location providing access to Blackpool's many attractions and is sought after by many incoming visitors.
Colin and Susan Martin	Reads Avenue	02.05.10	STC	Object to the exclusion of Reads Avenue from the proposed holiday area. Concerns regarding the effects the proposals may have on property values and reduction in visitor numbers. The area carries high volumes of traffic into the central area of Blackpool and is central to all amenities. Suggest the proposals to have housing in this area is impractical and unethical and will further encourage the deterioration of the area.
Helen and George Stevenson	Reads Avenue	06.05.10	STC	<p>Concerns regarding the new proposed plans. Bought property in 2003 and have concerns that the plans were first proposed in 2001/2002 and were not informed of this when purchasing the property. Question when the plans were first conceived.</p> <p>Concerned how the proposals may affect successful businesses in the area which bring in thousands of pounds each year.</p>
Robert Chambers	Reads Avenue	04.05.10	STC	Object to the proposed exclusion of Reads Avenue from the holiday area. Concerned that properties in the unprotected area will drop in value, there will be an uncontrollable rise in low quality flats, and a rise in crime.
Keith and Brenda Shone	Reads Avenue	22.05.10	STC	<p>Object to the proposal to take Reads Avenue out of the protected holiday area. Have invested money in the business and have achieved two star accreditation.</p> <p>At a loss to understand why the council propose to take Reads Avenue out of the holiday area, when it is close to many of the holiday attractions, is a good trading area and have very few hotels which cater for 'stag and hens'.</p> <p>Concerned that losing protected status will allow people to turn their businesses into HMOs, which would be bad for Reads Avenue and Blackpool as a whole.</p> <p>Suggest that allowing guest house to turn back to residential properties is not feasible, where the cost of conversion and maintaining a house of such a size would prove prohibitive.</p>
Mr and Mrs Turner	Reads Avenue	26.04.10	STC	Object to taking Reads Avenue and Palatine Road out of the holiday area, suggesting that the roads are close to all the amenities and that many businesses are star rated.
Mr and Mrs Turner	Reads Avenue	13.07.10	STC	Guests are concerned they might not be able to stay at the guest house if taken out of the holiday area, and do not wish to stay elsewhere, particularly not Travelodges. Includes a petition against the closure of the guest house and hotels on Reads Avenue including 35 signatures.
Hazel Turner (on behalf of the Reads Avenue Cluster Group)	Reads Avenue	17.07.10	STC	General consensus of the community who trade and reside in Reads Avenue is for the Council to continue to grant protection under the existing scheme. In a letter from Douglas Cooper (former Head of Development Plans and Projects) it is stated that 'hotels to lose protection is a somewhat contentious term' and that the removal of 'protection' only serves to provide an option as 'successful conversions could be made to failed or failing guest houses'. Proprietors would appreciate clarification of how the council have arrived at their conclusion, as proprietors do not class themselves as failing but successfully trading and potentially thriving.

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				<p>Enjoy continued regular bookings and along with new clients yearly. Provide a personal service for those who prefer smaller accommodation; catering for all ages; close to the town centre and other attractions but with a quiet ambience. A local CIU affiliated club is 'on the doorstep' of Reads Avenue, with guest houses and guest supporting other local business and associated employment.</p> <p>Refers to the Blackpool Regeneration Framework (2005/06) and the improvement of key gateways into the town, suggesting Reads Avenue provides an established central gateway, which with investment could create a more appealing environment.</p> <p>Suggest that other than the Houndshill development the area has been neglected of plans or funds. Potential for increased business if area is invested in and tidy up commercial properties.</p> <p>Understand the council is not taking away the right to trade but have concerns that businesses may be affected by increasing numbers of HMOs.</p> <p>Concerns regarding a potential drop in value of properties which may create a financial void for those who have invested in maintaining and up-grading properties.</p> <p>Comment that the size of hotels and guest house accommodation is too large to provide an economical residence for owners, combined with the burden of costs to convert to residential use. Mixed residency may work on the sea front but may cause social problems between business and residents in streets such as Reads Avenue. Question the saleability or achievement of realistic rental income for conversions.</p> <p>Understand the resort will never achieve the heights of days gone by, but suggest the lack of entertainment at the beginning of the year has affected the length of the season. A reduction in visitors will impact upon entertainment providers. Entertainment providers should look to advertise through television or national newspapers.</p>
Graham and Hazel Turner	Reads Avenue	15.07.10	STC	<p>Object to the proposed exclusion of Reads Avenue from the holiday area. Take pride in the properties inside and out. Receive regular repeat business and new visitors. Excluding the road can only serve to degenerate this area of the town. The threat of HMOs will lead to an increase in anti-social behaviour which may affect visitor numbers.</p> <p>Many properties have upgraded and invested in properties and have achieved a range of accreditation levels. Reads Avenue provides a gateway to the town centre, providing access to the rest of the town centre holiday accommodation.</p>
Leith Planning Ltd	Tyldesley Road	21.07.10	Foxhall	<p>The SPD refers to the Foxhall Neighbourhood Plan and that it is unclear whether this is referring to the Foxhall Area Action Plan or a further document. Suggest it is unreasonable to expect third parties to participate in a consultation exercise without clearly understanding the status of documents.</p>

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				<p>The reference to the potential for the proposed Foxhall main holiday accommodation area as potentially becoming a part of a future Foxhall Village Conservation Zone is premature in advance of an evaluation of the character and appearance of the Foxhall area.</p> <p>Should clearly distinguish between the aspects of the policy referable to Foxhall as defined in the Action Plan and the Foxhall Main Holiday Accommodation Area.</p> <p>Supportive of the endeavours to regenerate the Foxhall area and the intention to manage change and restore confidence, but it unclear what is meant by 'remodelling of these areas to create balanced residential neighbourhoods'. It is incumbent on the council in what way the area is to be remodelled and what would constitute a mixed neighbourhood.</p>
Stuart Hanlon	Rigby Road	29.05.10	Foxhall	Main concern is the Foxhall area of Blackpool and its redevelopment.
Stuart Hanlon	Rigby Road	29.05.10	Foxhall	<p>Comments that customers want family run quality accommodation, and that it would be better to force dirty hotels to close. Refers to issues with the national accreditation system, suggesting that badly run star rated businesses is not the same as a well run, clean and friendly hotel or guest house which may not be rated.</p> <p>Questions why 'no future scenario for tourism in Blackpool will restore past visitors numbers', suggesting if there were investment in attractions there may be an increase in visitor numbers, however the lack of effective promotion and advertising is another major issues depressing Blackpool visitor numbers. Blackpool would benefit from the appointment of a professional promoter which would provide a single point of contact.</p> <p>The promenade is not all about accommodation. The 'shop front' has to be clean, varied and viable. Questions whether a grant or loan system could be implemented to assist property owners to afford to paint their properties.</p> <p>Suggests 'high quality' should not mean just higher prices, with 'working class' families unable to afford high prices but want good quality accommodation.</p> <p>Questions why large, budget chain hotels have been given approval to build in the town if, as the SPD states, there is a need to shed bedspaces. Suggesting that since the opening of perceived 'value' accommodation, the business has seen a dramatic drop in occupancy levels.</p> <p>More emphasis should be given to the statement that in mixed neighbourhoods the policy would 'continue to recognise the importance of remaining holiday properties, complementing a higher quality residential profile'. Suggesting that this statement seems to be missed by most people that read the document or talk about it in public.</p> <p>Refers to issues of parking, the length of time for promenade to be completed, the need for pavements and</p>

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				buildings facing the seafront to be repaired, improved and cleaned, and the need to inform residents and visitors of what is happening in the town potentially using mediums such as www.wozzon.com .
Vicki M Gale	Alexandra Road	29.06.10	South Beach (SB)	<p>Hoteliers on Alexandra Road agree that there is too much holiday accommodation in Blackpool. Have concerns that a large chain hotels provide a number of beds.</p> <ul style="list-style-type: none"> • Agree, in principle, the promenade should be the 'shop window' of holiday accommodation in Blackpool, however many hotels on the promenade are in a state of disrepair, • Agree in principle with the policy approach for the holiday areas but not proposed boundaries. • Do not agree with mixed neighbourhoods. <p>Do not agree that Alexandra Road should be a mixed area. The road meets and exceeds all the criteria outlined in the SPD. Large proportion of properties in Alexandra Road provide quality holiday accommodation.</p> <p>Converting redundant hotels into family houses is an unrealistic solution given the numbers involved. Any changes require a skills and jobs strategy.</p> <p>Many hoteliers have upgraded, maintained and improve properties, and have worked with the Council to achieve accreditation.</p> <p>Many hotels in Alexandra Road are too big to be turned into a single dwelling and do not have sufficient car parking to meet the requirements of flats.</p>
Michael. J. Chappell (on behalf of Alexandra Road West Community Action Group)	Alexandra Road	26.04.10	SB	<p>Many visitors stay in smaller quality family run hotels which provide the public with a fair choice. Small hotels are the lifeblood of Blackpool.</p> <p>The current Resort Neighbourhoods already suffer from HMOs.</p> <p>Alexandra Road is a main holiday destination in South Shore, containing hotels which are predominantly accredited.</p> <p>Travel Inns add to the bed space problem. Blackpool needs new 5 star hotels not budget hotels.</p> <p>Mixed neighbourhoods don not work. South Shore, Central and North Shore have already experienced the drug and drink culture moving into the holiday areas.</p> <p>The way forward is to have a think tank of associations who know the areas they represent.</p>
Colin and Carol Eden	Crystal Road	03.07.10	SB	<p>Object to there being a designated holiday area in Blackpool, with all holiday accommodation owners allowed to be included as part of the town as a whole.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>Comments that when purchasing the business it was included in a resort neighbourhood which the council were going to improve but to date has not occurred.</p> <p>Concerns that it will be difficult to see a business if it is outside a proposed holiday area. Question why Crystal Road is outside the proposed holiday area when the street is location close to the promenade.</p>
D E Askham	Crystal Lodge	27.05.10	SB	<p>Agree with the need to reduce the number of holiday accommodation properties in Blackpool, but disagree with the plan to reduce the current holiday areas and to restrict change of use in the proposed holiday areas. Suggests there are hotels in the proposed areas which are trading poorly and wish to sell or change use but cannot. Concerns also that successful businesses outside the proposed areas will be unable to recover their investments.</p> <p>Suggest the boundaries should be abolish or leave the resort neighbourhoods as they currently are.</p>
Simon Marley	Leyfield Close	24.05.10	SB	<p>Suggests the South Beach area should be extended to encompass include Haig Road up to Waterloo Road.</p>
Blackpool Pleasure Beach		05.07.10	Pleasure Beach (PB)	<p>Support the proposals for the key Hotel Frontages, consider these hotels to be an integral part of Blackpool's character and appeal.</p> <p>Support the proposals for the Main Holiday Accommodation Promenade Frontage, these frontages are an important part of Blackpool's shop front and any reduction in holiday accommodation in these areas would harm the attractiveness of the resort. Support the proposal to allow redevelopment but to retain the quantum of floorspace. The approach of allowing high quality mixed use seafront holiday and residential development, whilst retailing existing floorspace, should provide an incentive for redevelopment of poorer quality hotels.</p> <p>The approach to the Promenade frontage outside the key hotel frontages and main holiday accommodation promenade frontage would appear to be an appropriate way forward, with no protection of the existing quantum of floorspace, but similarly no prevention of the provision of new hotels through redevelopment of existing properties.</p> <p>The creation of six 'Main Holiday Accommodation Areas' away from the Promenade is a reasonable response to the changing holiday market. Strongly support the promotion of the replacement of low quality older holiday accommodation and the development of new or improved visitor accommodation. The 'managed retreat' in other locations should improve the viability of hotels in these designated areas, which will increase the likelihood of improved accommodation being provided in these areas, either by refurbishment or redevelopment.</p> <p>Not clear what is meant by "generally safeguarding" holiday accommodation use, as this appears to be weaker than Policy R19 of the Core Strategy Preferred Option which "safeguards" and promotes new and</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>improved accommodation of a high standard.</p> <p>The statement “replacement of low quality older holiday accommodation”, is insufficiently precise in that it needs to be clear that the expectation will be that there will be no significant loss of holiday floorspace.</p> <p>Support the proposed boundaries of the ‘Pleasure Beach Main Holiday Accommodation Area’, and the rationale behind it.</p> <p>Request that the Core Strategy makes it clear that further high quality hotel development at Pleasure Beach will be supported. Following the success of the Big Blue Hotel, it is an aspiration of the Pleasure Beach to develop further on-site accommodation, and one opportunity would be the use of North Car Park, alongside Balmoral Road. This would act as a further catalyst to the upgrading and redevelopment of hotels elsewhere in Blackpool.</p> <p>The Pleasure Beach are not asking for the boundary of the ‘Pleasure Beach Main Holiday Accommodation Area’ to be extended onto the Pleasure Beach North Car Park, as no decision has yet been made on the location of the next Pleasure Beach hotel and this may restrict other development opportunities on that part of the site (for example, additional rides, new park entrance, retailing and/or restaurants).</p> <p>Request that an additional sentence is inserted in paragraph 4.44 stating: “New good quality accommodation outside the Main Holiday Accommodation Area but within the Pleasure Beach site itself will be supported”. This would give the appropriate level of certainty that a further hotel would be supported within the park without identifying a specific site and restricting other opportunities.</p> <p>Support the approach to the loss of holiday accommodation in these paragraphs, were loss of hotels will only be allowed in exceptional circumstances and where the two criteria are met.</p> <p>Support the general approach to a managed reduction in the numbers of holiday premises, however it should be made clear that in addition to supporting existing holiday accommodation seeking accreditation, that proposals for the redevelopment of existing hotels (or groups of hotels) into new good quality hotel accommodation will be supported. Whilst we accept that this is not a priority in these areas, the SPD needs to provide the certainty that the Council will continue to support efforts to retain accommodation in these areas, albeit only where there will be a significant increase in quality.</p>
Withnell Road, Station Road, Osborne Road and		04.05.10	PB	<p>Guest Houses form an important part of Blackpool's backbone. Suggested that many visitors frequently walk down Withnell, Station and Osborne Road, providing the first impression of Blackpool for visitors arriving at the nearby car parks.</p> <p>Concerns that future expansion of the Pleasure Beach may affect the livelihood of guest house and hotel</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Surrounding Area Petition Against the SPD.				<p>owners in the area. This has also created uncertainty in the area.</p> <p>Consider the guest houses and hotels which have been purchased by the council too large and expensive to house one family.</p> <p>Suggested that not everyone can afford to stay inn 4 or 5 star rated accommodation. There is still a market for guest houses and medium sized hotels.</p> <p>Concerns regarding the affect on businesses which are outside a proposed holiday accommodation area.</p> <p>Refers to statements from the Blackpool South MP, Gordon Marsden, which suggests converting redundant hotels into family housing is an unrealistic solution. Any changes require a skills and jobs strategy to go with them. Self-contained flats and guesthouses in the areas outside the proposed holiday areas should be supported by a strategy. The Council's plans for the holiday area cannot be isolated from proposals elsewhere, such as development in the edge of Blackpool.</p> <p>Contains a petition with 114 signatures.</p>
Derek Robertson	Osborne Road	09.06.10	PB	<p>Suggests Osborne Road should be included in the proposed holiday area. Identifies Osborne Road as a main walkway from the main car park to the Pleasure Beach and Sandcastle water park. Contains a number of guest houses and hotels with many accredited. Some visitors are football supporters, potential for the number of football supported to increase.</p> <p>Concerns regarding the value of the guest house if outside the proposed holiday area. Suggest HMOs on the street and neighbouring streets are affecting business.</p>
Osborne Road Acton Committee	Osborne Road	13.05.10	PB	<p>Question what are the plans for the area and surrounding areas of Osborne Road, Withnell Road, Bond Street and Station Road, particularly the areas that are excluded from the proposed holiday areas.</p>
Stephen Witter	Dean Street	29.07.10	PB	<p>On behalf of 15 properties on Dean Street, requesting the inclusion of Dean Street in the proposed holiday areas. Refers to the announcement of investment in the Pleasure Beach, South Pier and the Sandcastle Water park, and the boost that this will have to the South Shore area. Suggest that with this investment the surrounding streets may have an upturn in business and will bring more visitors. Concerns</p> <p>A number of holiday accommodation properties on Dean Street do not want to be blighted by the stigma of not being included in the proposed holiday area. Dean Street will be at the forefront of the accommodation area when investment and plans are completed.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Gillian Wilsden	Withnell Road	18.05.10	PB	<p>Primary concern is the intense condensing of the main holiday area in Blackpool. Suggests enforcing en-suite accommodation to reduce the amount of bedspace and would upgrade the standards. Concerns that the hint of reductions or HMOs and compulsory purchase cause the values of properties slump, and will pave the way for bad landlords and further properties converting to HMOs.</p> <p>Concerns that there is a danger of destroying the history of Blackpool. Still believe that the traditional guest house can and will propose, with the potential they may become the 'place to stay' in an authentic environment.</p> <p>Asks to keep the Holiday Area intact.</p>
Gillian Wilsden	Withnell Road	19.06.10	PB	<p>Amazing feats have already been achieved around the town but have concerns with the decision to turn around one or two areas in Blackpool that have not succeeded previously whilst other areas will be omitted though they are thriving. Concerned with the plans to convert seafront hotels into residential use, feel the plans will not enhance the general ambience of South Promenade, but will only suffice for financial gain to a few property owners. Small hotels and hoteliers stand to lose out the most in the plans, feel that an attempt is in place to destroy what is left of the original guest house even though they provide the backbone to Blackpool's initial success.</p> <p>Changing areas away from the promenade will result in many more HMOs. Concerns that many hotels have already slipped through the net already despite the current holiday area status. The cost to turn a guest house into a private house will far outweigh the cost of selling it to buy another house somewhere.</p> <p>Aim to invest in guest houses and save our heritage and don't turn it into a replica Las Vegas whereby the main false façade, The Strip, is linked back-to-back with extremely poor areas that have been neglected.</p>
J.F. Chappell (on behalf of the Coliseum Trade Association)	Alexandra Road	20.07.10	General	<p>There is still a market for small hotels and holiday flats which provide a more personal touch when compared to Travelodges, and provide choice for different tastes, ideas and financial commitments.</p> <p>To reduce bedspaces, the hotels to the south of the Solaris should be given permission to build luxury style apartments.</p> <p>More visitors will be attracted to Blackpool following the promotion of the football club to the Premier League and once the Promenade and tram upgrades are completed.</p>
S. Stanniland		25.05.10	General	<p>The holiday sector is going through a rough patch at the moment, but it is the same in every other holiday town. Have not had any reports of any other holiday towns decimating their holiday sectors because of the fall in holiday makers.</p> <p>Questions why not scrap the idea of holiday areas and introduce Blackpool as a Holiday Resort, with</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>everyone trading in a holiday resort.</p> <p>A majority of properties that are being excluded from the proposed holiday areas are far superior externally to quite a few properties that are being included, especially those on the promenade.</p> <p>Need to ensure HMOs do not spring up by making it impracticable and not profitable to trade, achieved by regulating and monitoring such properties.</p> <p>Anyone should be allowed to deregister their property and retire from the trade, on the provision they maintain their property and stipulate only they and their non-paying family can reside there.</p>
Alan Greenhalgh	Sandhurst Avenue	01.06.10	General	<p>In agreement with the necessity to reduce the amount of holiday accommodation and to effectively manage the change of use of properties which are no longer seen as viable holiday accommodation. In general agrees with the maintenance of the suggested main holiday areas. Wonder what the Council's view is on current hoteliers/holiday flat proprietors in the main holiday areas just deciding to cease trading if not allowed to convert to properties to other uses. This has seemed to have happened in a number of instances on the Promenade, notable examples being the Northmount at Gynn Square, Revills Hotel near the Metropole and several examples south of the Pleasure Beach. Closed and boarded up properties on the Promenade do nothing to enhance Blackpool's 'shop window' and may be worse than allowing suitable alternatives in these areas.</p>

Appendix 3b: Summary of Public Consultation Statutory and Other Stakeholder Responses

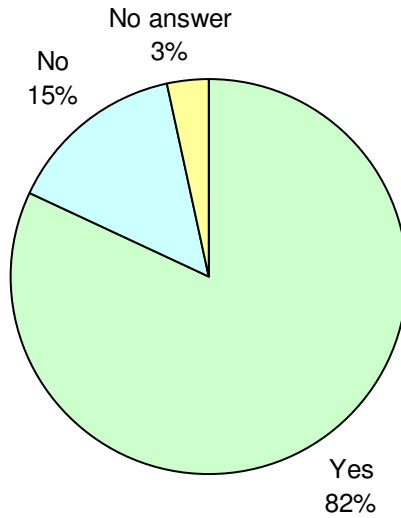
Consultee	Date Received	Summary of Response
The Lancashire and Blackpool Tourist Board	02.08.10	<p>In general the Lancashire and Blackpool Tourist Board (LBTB) would support the proposed strategy to reduce the holiday accommodation stock with a focus in quality and the retention of key clusters and current strengths in provision.</p> <p>Comments on the proposed boundaries of the main holiday accommodation areas:</p> <ul style="list-style-type: none"> • <i>The Cliffs</i>: area would be supported although there is varying levels of accreditation between King Edward (19 accredited) and Empress Drive (4 accredited properties). • <i>Lord Street</i>: This area has established itself as a niche market and continues to be a thriving area. Support the need to encourage accreditation but challenging in areas where businesses are thriving and there is no statutory requirement. • <i>Town Centre</i>: recognised that further development in the town centre and facilities will be key to the success of the area. Would be beneficial to identify specific proposals that would further support existing offer. • <i>Foxhall</i>: Support the consolidation of this area based upon its strong heritage. • <i>South Beach</i>: There are some good levels of accreditation in Alexandra Road which could be considered within the south beach area. Also LBTB would be interested to know how the proposed development around one of the crescents would fit in with the strategy. • <i>Pleasure Beach</i>: Recent announcements of further investment in the Pleasure Beach will help to maintain/increase visitor numbers to the area. <p>A key element of the strategy will be the smooth transition of existing business to residential use ensuring strict enforcement standards. This a major concern for those who will continue to offer holiday accommodation within the mixed residential areas. Guidance on the standards for residential properties will be critical to the success of mixed neighbourhoods.</p> <p>LBTB would like to see significantly higher levels of accreditation within the defined holiday accommodation areas, and keen to understand more about how businesses will be encouraged to become accredited without any statutory obligation. As an inspected only policy LBTB's aspiration would be to work with Blackpool Council in developing and implementing this strategy further.</p> <p>The creation of clusters and associations is not supported – this can result in further fragmentation and varying of standards. It is suggested that businesses are encouraged to work with existing associations i.e. Stay Blackpool.</p> <p>Assisting businesses though grant schemes such as Invest in the Best is supported but challenging in the current economic climate and period of funding cuts. lessons learned from the Invest in the Best Scheme, relate to the size of the award, intervention rates and a more intense focus on quality.</p>
Environment Agency	10.06.10	Have no issues with the document. Recommend that for new buildings sustainable forms of construction are used including recycling of materials, energy efficiency measures and water management in the development, including, dealing with grey waters.
Network	04.06.10	No comment to make

Consultee	Date Received	Summary of Response
Rail		
Highways Agency	02.07.10	No specific comments to make as the document does not have any specific detrimental effect with regard to the Strategic Road Network.
English Heritage	07.07.10	Support the aims of the document which includes improving the quality of holiday accommodation and it is important that this addresses improving the environmental quality of the buildings themselves and the wider area. The document makes reference to enhancing character and appearance and retaining intrinsic architectural character. The document briefly describes the character of the areas, it is suggested the document refers to more detailed information, and the need to consider this when developing more detailed proposals and appraising applications in the area.
Coal Authority	28.05.10	No specific comments to make on the document at this stage.
The Theatres Trust	29.06.10	Due to the specific nature of the Trust's remit this consultation is not directly relevant to the Trust's work and have no comments to make.
NLP Planning on behalf of Bourne Leisure	28.06.10	<p>For Bourne Leisure's operations to continue to attract customers and to respond to changing market conditions, the company needs to invest regularly in order to improve its product to meet increasing customer expectations. It is therefore important that generally, and in Blackpool in particular, emerging development plan policy supports appropriate improvements, alterations and extensions to tourism accommodation at holiday parks, as well as the provisions of new facilities catering for visitors.</p> <p>Support should be given to the SPD to ensure a range of tourism accommodation and to enhance existing tourism accommodation and facilities, including holiday parks, throughout the borough, in order to ensure that Blackpool becomes a unique year round twenty first century resort.</p> <p>Bourne Leisure considers that additional existing holiday areas outside the six defined areas, such as Marton Mere, should be identified as important holiday areas, with planning policies put in place to support their enhancement and long term future.</p> <p>Notes the draft SPD support policies R19 and R20 of the Core Strategy, which deal predominantly with hotel uses and does not provided detailed guidance on holiday park accommodation.</p> <p>In relation to policy R19, Bourne Leisure acknowledges the different character areas but considers that additional existing holiday areas, such as Marton Mere should be identified as important holiday areas.</p> <p>Emphasise that holiday parks are an important part of Blackpool's holiday accommodation offer and contribute to its diversity and choice and that planning policy guidance on holiday parks should be provided in both of the Core Strategy and SPD.</p> <p>Bourne Leisure considers that policy guidance in the SPD should:</p> <ul style="list-style-type: none"> Expressly support and encourage the retention, consolidation, enhancement, diversification and intensification/expansion of existing holiday and caravan parks, subject to any necessary environmental/other development control criteria, particularly where proposals improve the range and quality of accommodation and facilities on a site and result in permanent and significant

Consultee	Date Received	Summary of Response
		<p>improvements to the access, layout and appearance of the site and its setting in the surrounding landscape; and</p> <ul style="list-style-type: none"> • Allow for operators to undertake a phased approach to consolidation, improvement, upgrading or extension of existing caravan sites and holiday parks over several years, ensuring that the existing accommodation and visitor operation is not disrupted and that each proposal caters appropriately for current and forecast needs and demand. <p>The SPD guidance should be drafted to take account of the identified issue at bullet point 3, page 10 of the Fylde Coast Visitor Accommodation Study, which states ‘there is a concern that current policy to restrict any increase in static caravan numbers at existing parks provides no incentive for park owners to increase their parks. We therefore suggest that policy is amended to allow for the introduction of higher quality lodge units in appropriate locations’.</p> <p>The SPD, in relation to existing holiday parks, should therefore strongly support opportunities for investment.</p>
Kenrick and Co	12.07.10	<p>The proposed de-regulation of the holiday zone is flawed, reasons are as follows:</p> <ul style="list-style-type: none"> • It is not commercially viable to convert an existing 10 bedroom hotel into a single residential property, and if people de-register their property it may encourage them to use them as illegal HMOs. • Despite the Council’s reassurances that they will vigorously take enforcement action against the illegal use of HMOs I suspect they will end up losing a fighting battle and the areas involved will become less desirable to both live and stay. This will have an adverse effect on holiday accommodation providers who intend on continuing to trade in that particular area. • Biggest concern is the saleability of holiday accommodation once an area has been de-registered. Have experienced clients who were looking to purchase hotels and holiday flats withdrawing from sales once they discovered the proposals. <p>A common comment used by clients is ‘why would be buy a hotel outside the holiday zone’? This sort of opinion will have a disastrous effect on those wanting to sell their hotel or holiday flats.</p>

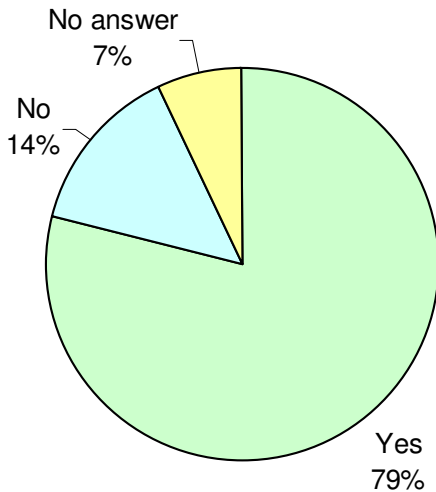
Appendix 3c: Summary of Questionnaire Responses

Q1 Do you agree there is too much holiday accommodation in Blackpool and a need for change in the holiday areas?



Irrespective of the precise boundaries, do you agree with:

Q2 the safeguarding of areas designated as the **Key Promenade Hotel Frontages?**



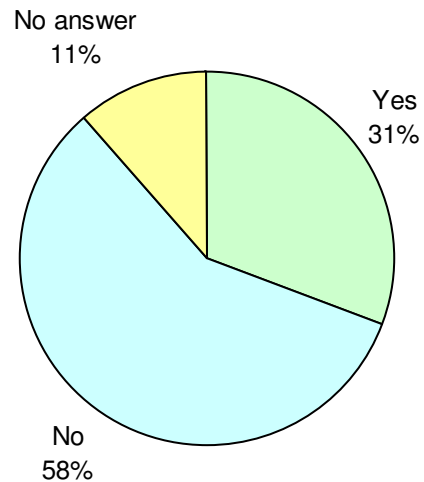
Q3 the safeguarding of holiday accommodation on the **Main Promenade Frontage**, alongside a new seafront residential offer?



Q4 the safeguarding of holiday accommodation use off the promenade in the **Main Holiday Accommodation Areas?**

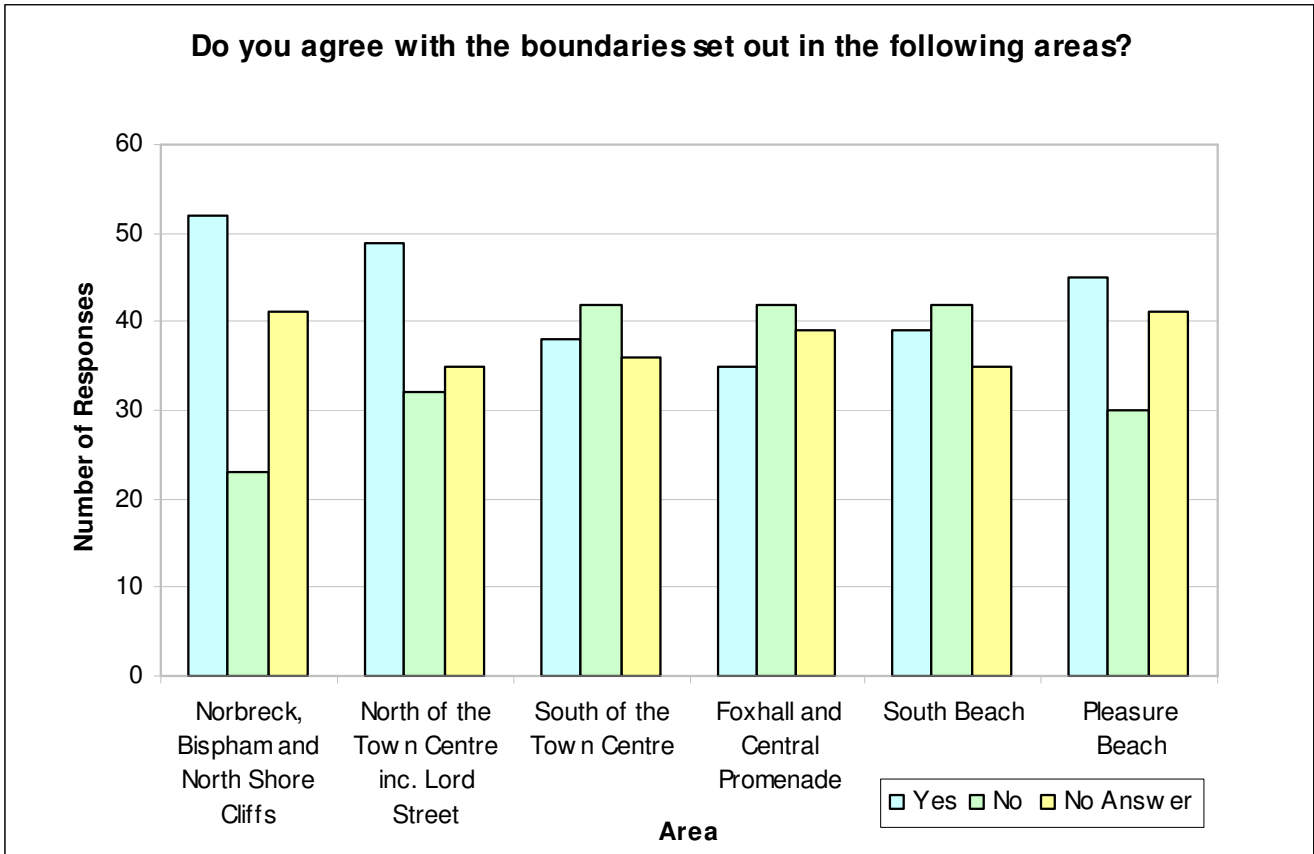


Q5 the proposed approach on the **Mixed Neighbourhoods?**

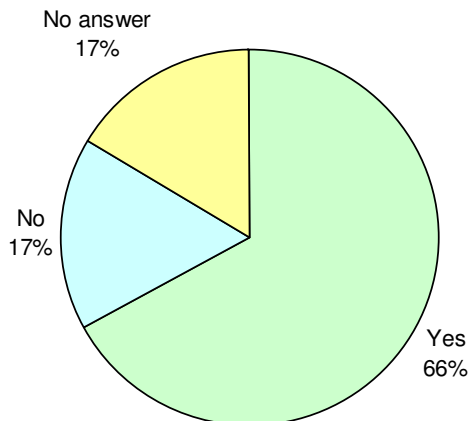


Q6 Do you agree with the boundaries set out in the following areas?

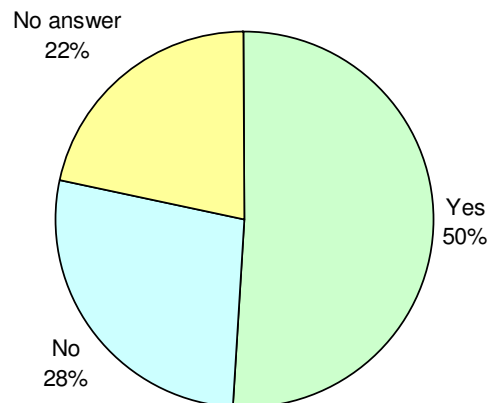
1. Norbreck, Bispham and North Shore Cliffs
2. North of the Town Centre
3. South of the Town Centre
4. Foxhall and Central Promenade
5. South Beach
6. Pleasure Beach



Q8 Do you support the steps taken to tackle poor quality housing?



Q9 Do you agree with the key aims of the 'New Homes from Old Places' document?



Appendix 3d: Core Strategy Preferred Option and Holiday Accommodation SPD Public Exhibitions

Resort Area: Norbreck, Bispham and North Shore Cliffs
Event Venue: The Savoy Hotel, Queen Promenade, Blackpool
Date: Monday 21st June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Graham Page (Core Strategy Manager), Helen Duignan (Planning Officer), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner). **Accreditation:** Colin Wolfendale (Training & Events Co-ordinator). **Enforcement:** Nicci Rigby (Planning Enforcement Manager), Jim Merridew/Trevor Marshall (Housing Enforcement Officer). **ReBlackpool:** Ade Alao (Deputy Director of Housing Regeneration).

Number of Attendees Recorded: 28

Responses:

Total questionnaire responses to Core Strategy:	7
Total questionnaire responses to Holiday Accommodation SPD:	9

Public consultation/ Exhibition Summary:

The main issue arising from the Norbreck, Bispham and North Shore Cliffs consultation focussed particularly on the omission of Gynn Avenue and Wilshaw Road from the Holiday Areas.

It was acknowledged that a strong policy is required to encourage better standards of both residential and holiday accommodation and prevent HMOs.

Summary of responses

- Too much poor quality holiday accommodation
- Boundary should be amended to include Wilshaw Road. It is in a key position overlooking Gynn Gardens, near the Promenade. It attracts holidaymakers, particularly families and couples looking for quality accredited accommodation.
- Any policy that encourages better standards of accommodation and rids Blackpool of seedy non-accredited accommodation has got to be good.
- Strong policy required to rid proposed holiday areas of HMOs. A requirement for no HMOs should be extended to a mile radius of these areas.
- Green Areas such as Marton Moss should remain as fields and other areas regenerated first.

Suggested Changes (Strategy)

- None made

Suggested Changes (Boundaries)

- Add Willshaw Road (2)

Resort Area: North of Town Centre
Event Venue: Claremont First Steps Centre, Dickson Road, Blackpool
Date: Thursday 24th June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Graham Page (Core Strategy Manager), Helen Duignan (Planning Officer), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner). **Accreditation:** Jason Cotillard (Business Development Officer). **Enforcement:** Sara Darbyshire (Planning Enforcement Technician), Jennifer Clayton/Alex Bracken (Housing Enforcement).

Number of Attendees Recorded: 42

Responses:

Total questionnaire responses to Core Strategy:	16
Total questionnaire responses to Holiday Accommodation SPD:	17

Public consultation/ Exhibition summary:

The Lord Street consultation event focussed particularly on concerns regarding the inclusion of Lord Street in the holiday area and the removal of Banks Street. There were many concerns raised about property values once the designations were in place. There was some apprehension regarding the concept of mixed neighbourhoods, with a perception that it tends to de-generate an area with HMOs and associated anti-social behaviour.

Summary of responses

- ‘Popular holiday areas seem to have been omitted in favour of less popular areas.’
- ‘Some of the nicest hotels in Blackpool are located on the lower half of Banks Street, which is predominantly holiday accommodation.’
- ‘Excluded areas will not be able to sell hotels at the right price and will not be able to obtain bank loans’ (3)
- ‘Enforce standards such as star ratings’
- ‘Mixed Neighbourhoods don’t work’
- ‘We can’t tackle poor quality housing until there is a huge money pot to do it.’
- ‘Mixed Neighbourhoods are a good idea but present to mix tends to degenerate area with HMOs and un social behaviour’
- ‘Get rid of the rundown hotels/guesthouses across all areas’
- ‘Too many HMOs which need to be urgently tackled’ (3)
- ‘Will I be compensated for any loss of property value?’
- ‘Holiday accommodation should be along the Promenade and a distance back, not in pockets i.e. Lord Street’
- ‘Lord Street is not currently a holiday area – lots of permanent accommodation already’

Suggested Changes (Strategy)

- None made

Suggested Changes (Boundaries)

- Add Banks Street (6)
- Block between Wilton and Derby Road including Dickson Road frontages should be included in the holiday area
- Include Pleasant Street on north side up to Braithwaite Street
- Remove Lord Street

Resort Area: South of Town Centre
Event Venue: St Johns Conference Centre, Cedar Square, Blackpool
Date: Monday 28th June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Keith Keeley (Neighbourhood Plan Manager), Helen Duignan (Planning Officer), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner). **Accreditation:** Jason Cotillard (Business Development Officer). **Enforcement:** Mark Warburton (Planning Enforcement Officer), Liz Banner/Sam Robinson(Housing Enforcement)

Number of Attendees Recorded: 23

Responses:

Total questionnaire responses to Core Strategy:	21
Total questionnaire responses to Holiday Accommodation SPD:	28

Public consultation/ Exhibition summary:

The Town Centre South consultation focussed particularly on concerns regarding mixed neighbourhoods, with a view that holiday accommodation cannot exist alongside residential properties.

The main issue identified was the omission of Reads Avenue, Palatine Road, a small part of Coronation Street and a small Leopold Grove from the Holiday Areas.

The development of new budget hotels in the surrounding area was also considered to have a detrimental impact on guesthouses and B&Bs in the area.

Concerns were also raised regarding the cost of converting to residential accommodation and the resulting value of the property.

Summary of responses

- There's no need for 'budget' type hotel chains (3)
- Too many HMOs in holiday areas
- Financial assistance should be made available to enable conversions
- Some of the proposed holiday areas do not meet the Council's own criteria
- Conversions to residential too costly
- More parking in the central holiday area needed
- Areas should not be protected over each other
- Residential does not mix with holiday due to ASB (3)
- No area needs protecting. Market forces will decide which hotels survive by natural wastage.

Suggested Changes (Strategy)

- No boundaries (3)

Suggested Changes (Boundaries)

- Add Palatine Road
- Add Havelock St (7)
- Add Reads Ave (5)

Resort Area: Foxhall
Event Venue: Blackpool Philharmonic Club, Foxhall Road, Blackpool
Date: Monday 14th June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Graham Page (Core Strategy Manager), Helen Duignan (Planning Officer), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner), Lyndsey Cookson (Planning Officer – Neighbourhood Plans), Keith Keeley (Interim Regeneration Manager). **Accreditation:** Jason Cotillard (Business Development Officer). **Enforcement:** Karen Parker (Planning Enforcement Technician), Garry Ivett (Housing Enforcement Officer), Marion Dunne (Neighbourhood Enforcement Officer). **Housing:** Steve Matthews (Head of Strategic Housing). John Donnellon (Assistant Director – Housing, Planning and Transport).

Number of Attendees Recorded: 59

Responses:

Total questionnaire responses to Core Strategy:	20
Total questionnaire responses to Holiday Accommodation SPD:	19

Public consultation/ Exhibition summary:

The Foxhall consultation focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot coexist with residential properties. The development of new budget hotels in the surrounding area was also considered to have a detrimental impact on guesthouses and B&Bs in the Foxhall area.

Reflecting recent work undertaken by the Council on the *Foxhall Preferred Option Area Action Plan* (July 2009), residents and business owners had concerns regarding the uncertainty of the area's future. In particular, this focused around Tyldesley Road, and the uncertainty relating to funding provision for the remodelling of this area. Whilst the future of Tyldesley Road is a key issue, this is not within the scope of the consultation for the Core Strategy or Holiday Areas. The key regeneration issues in Foxhall are, as identified in the *Foxhall Area Action Plan Preferred Option report (2009)*, based around the decline in tourism, resulting in social and economic deprivation and a deteriorating urban environment.

Summary of responses

- Blight (2)
- Tackle HMOs (1)
- A need to improve standards and levels of accreditation (3)
- Too many new budget hotel developments (e.g. Travelodge etc) (5)
- Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes or no money available (3)
- Mixed neighbourhoods and streets do not work (9)
- The Holiday Accommodation / Humberts Leisure data is inaccurate (2)
- Need more areas of green space (3)
- There is too much new (housing) development (1)
- Anti social behaviour (1)

Suggested Changes (Strategy)

- Wide boundary (1)

Suggested Changes (Boundaries)

- Add Rigby Road (1)
- Add Church Road (1)

Resort Area: South Beach
Event Venue: St Peter's Church, Lytham Road, Blackpool
Date: Monday 7th June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Graham Page (Core Strategy Manager), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner), Keith Keeley (Interim Regeneration Manager), Lyndsey Cookson (Planning Officer). **Accreditation:** Jason Cotillard (Business Development Officer), Colin Wolfendale (Training and Events Co-ordinator). **Enforcement:** Jennifer Clayton (Housing Enforcement Officer), Chris Cudlip (Housing Enforcement Officer), Trevor Marshall (Housing Enforcement Officer), Alex Bracken (Housing Enforcement Manager). **Housing:** Steve Matthews (Head of Strategic Housing). **ReBlackpool:** Ade Alao (ReBlackpool - Deputy Director of Housing Regeneration)
 John Donnellon (Assistant Director – Housing, Planning & Transport)

Number of Attendees Recorded: 72

Responses:

Total questionnaire responses to Core Strategy:	29
Total questionnaire responses to Holiday Accommodation SPD:	29

Public consultation/ Exhibition summary:

The South Beach consultation event focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot coexist with residential properties. Issues were raised in relation to the conversion of holiday accommodation into residential properties, particularly where properties were perceived to be too large to convert into residential use, and also the financial implications of this on the property owner.

Some of the main concerns also centred on the prevalence of low quality holiday accommodation and the need to improve the standard of holiday accommodation and encourage accreditation. The key regeneration issues, as set out in the *South Beach Area Action Plan - Issues and Options Report (2009)*, are to address the significant social and economic deprivation and poor environmental quality, in part resulting from the decline of tourism in the area.

Summary of responses

- Blight (1)
- Property values will decrease outside the holiday areas (3)
- Tackle HMOs (5)
- A need to improve standards and encourage accreditation (7)
- Poor quality holiday accommodation (10)
- Stronger enforcement is needed (2)
- Will there be any funding or grants made available to convert to residential (1)
- Too many new budget hotel developments (e.g. Travelodge etc) (5)
- Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes (5)
- Loss of Income/livelihood following removal from holiday areas (1)
- Mixed neighbourhoods and streets do not work (7)
- Not enough parking provision (3)
- Need more areas of green space (5)
- More support of small/local businesses (4)
- There is too much new (housing) development (2)
- Is there any funding or grants available? (2)
- Road network/Transport (2)
- Anti social behaviour (1)

Suggested Changes (Strategy)

- No boundaries (5)
- Widen boundary (1)
- Retain current boundaries (1)

Suggested Changes (Boundaries)

- Add Shaw Road (1)
- Add Lonsdale Road (6)
- Add Alexandra Road (5)
- Remove Wellington Road (1)

Resort Area: Pleasure Beach
Event Venue: Holy Trinity Church, Dean Street, Blackpool
Date: Monday 10th June 2010
Time: 2pm-8pm

Council Officers Present:

Planning: Graham Page (Core Strategy Manager), Katie Invernon (Assistant Planner), Keeley Briggs (Assistant Planner), Keith Keeley (Interim Regeneration Manager). **Accreditation:** Jason Cotillard (Business Development Officer). **Enforcement:** Dave Bowling (Planning Enforcement Officer), Garry Ivett (Housing Enforcement Officer), Ivy Hardcastle (Housing Licensing Officer), Jim Merridew (Housing Enforcement Officer), Trevor Marshall (Housing Enforcement Officer). **Housing:** Steve Matthews (Head of Strategic Housing).
 John Donnellon (Assistant Director – Housing, Planning & Transport)

Number of Attendees Recorded: 30

Responses:

Total South Beach responses to Core Strategy:	11
Total South Beach responses to Holiday Accommodation SPD:	13

Public consultation/ Exhibition summary:

The Pleasure Beach consultation event focussed particularly on concerns regarding mixed neighbourhoods, with a perception that holiday accommodation cannot coexist with residential properties. Issues were raised in relation to the conversion of holiday accommodation into residential properties, particularly where properties were perceived to be too large to convert into residential use, and the financial implications of this on the property owner.

Some of the main concerns also centred on the prevalence of low quality holiday accommodation and the need to improve the standard of holiday accommodation provision and encourage accreditation. The development of new budget hotels in the surrounding area was also considered to have a detrimental impact on guesthouses operating in the Pleasure Beach area.

Summary of responses

- Blight (1)
- Removal from the holiday areas will reduce property values (4)
- Loss of Income following removal from holiday areas (2)
- A need to improve standards and levels of accreditation (3)
- Too much poor quality holiday accommodation (6)
- Stronger enforcement is needed and to tackle HMOs (6)
- Will there be grants or funding to convert to residential (1)
- Too many new budget hotel developments (e.g. Travelodge etc) (5)
- Issues of converting holiday accommodation to residential, many properties are too large to convert to family homes or no money available (3)
- Mixed neighbourhoods and streets do not work (5)
- A lot of anti social behaviour issues, particularly relating to alcohol, drugs, and violence. (3)

Suggested Changes (Strategy)

- No boundaries (1)
- Promenade boundaries only (1)

Suggested Changes (Boundaries)

- Add Dean Street (3)
- Add Osborne Road (2)
- Add Station Road (1)