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Providing serviced holiday accommodation in Blackpool advice note

Last Modified April 25, 2023



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March 2023

1.0 Purpose of the advice note

1.1 This advice note is intended to inform and assist applicants seeking to provide serviced holiday accommodation in Blackpool. It explains what serviced holiday accommodation is, when planning permission is required, and how the Council will assess and determine applications. It has been produced as a result of the significant and continued number of enquiries made to the Council about the provision of serviced holiday accommodation within the town.

1.2 The advice note is intended to offer clarification and information and so will not be taken through a formal consultation process. Nevertheless, it will be a material consideration in the assessment of planning applications.

1.3 The Council's holiday accommodation strategy is to ensure that holiday accommodation is of high-quality, and is directed to appropriate locations within the borough. This is to safeguard the amenities of our residential neighbourhoods, bolster the character and function of our holiday areas, and support wider resort regeneration.

2.0 What is serviced holiday accommodation?

2.1 As a result of changing visitor demands, driven in part by the covid pandemic, Blackpool is seeing a significant increase in the provision of serviced, self-contained holiday flats or houses with no on-site management. This is commonly referred to as "AirBnB" accommodation although there are numerous companies that operate in the same way.

2.2 Based on its significant experience of holiday accommodation provision across the borough, the Council considers the following characteristics to be indicative of serviced holiday accommodation use:

- The accommodation is mainly made available for occupation by persons visiting Blackpool who live and consider their home to be elsewhere
- Typically there is no live-in, on-site management
- The accommodation is made available for use by different people and/or groups

- Specific arrangements are in place for visitors to gain entrance to the accommodation and to return keys at the end of their stay
- Provision is made for accommodation to be cleaned and waste removed between different groups of visitors, i.e. whilst the visitors may be expected to leave the accommodation in tidy condition, they are not expected to clean it fully or engage a service themselves to do so
- Linens are provided and are changed between each stay, i.e. visitors are not expected to provide their own or clean them or arrange for them to be cleaned prior to departure
- A bond is often charged to cover any potential damage to the accommodation which is returned upon departure providing the accommodation is left in an acceptable condition

3.0 When is planning permission needed?

3.1 The Town and Country Planning (Use Classes) Order 1987 (as amended) identifies two categories of particular relevance when considering this question:

Class C1 - hotels, boarding and guest houses where no significant element of care is provided

Class C3 - dwellings, (e.g. typical family homes)

3.2 Where use of land or buildings does not fall within one of the identified classes of the Order, it is considered to be a sui generis use.

3.3 Over the past few years there has been a proliferation of permanent residential property and some smaller hotels and guest-houses being converted into serviced holiday accommodation across Blackpool. What developers have not realised is that the majority of this redevelopment has required planning permission. This is because the Council considers that serviced holiday accommodation is a sui generis use.

3.5 Serviced holiday accommodation uses generally differ materially from typical class C1 hotel/guest-house accommodation because the accommodation is self-contained. This means that all of the facilities for day-to-day living (typically lounge, kitchen, bathroom and bedroom) are contained behind one entrance door. Furthermore, unlike typical hotel/guest-house accommodation, there is generally no on-site management present in holiday houses or holiday flat premises.

3.6 Self-contained accommodation provides communal areas such as lounges, dining rooms and kitchens for congregation. Holiday makers are typically more boisterous than permanent residents and are usually in Blackpool to take advantage of the resorts tourist offer, including its night-life. The lack of on-site management also means that use of communal areas is not supervised. In the Council's extensive experience, holiday flats and houses are occupied differently to hotel accommodation and have the potential to generate far more noise and activity.

3.7 As a result of the increased potential for noise and activity, serviced holiday accommodation is likewise materially different from standard, class C3 residential accommodation. Temporary occupants are likely to have less consideration for the amenities of neighbours than permanent residents. In addition, use of a property as serviced holiday accommodation prevents it from being used as permanent family or household accommodation. This can affect housing provision and the transience of occupants does not contribute to the creation of coherent, sustainable communities.

3.8 Whilst it can be possible for a flat or house used for holiday accommodation to fall within Class C3, this is rare. Such cases are generally limited to where the accommodation is a person's second home, or what they consider to be their holiday home; or where they rent out their own home on a very occasional basis for short period whilst they themselves are on holiday.

3.9 Generally speaking, therefore, the Council considers serviced holiday accommodation to be materially different from class C1 or class C3 uses. Planning permission is needed for all material changes of use.

3.11 There are no permitted development allowances that permit a change of use from either a class C1 hotel or guest-house, or a class C3 dwelling, to a sui generis serviced holiday accommodation use.

3.12 As such, planning permission from the Council is generally required for the provision of serviced holiday accommodation.

4.0 Where will serviced holiday accommodation be permitted?

4.1 The Council's strategy is to support high-quality holiday accommodation to meet the ever more discerning needs of visitors to the Resort. Policy CS21 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 states that...

"In order to physically and economically regenerate Blackpool's Resort Core and Town Centre, the focus will be on strengthening the resort's appeal to attract new audiences year round. This will be achieved by supporting...

Proposals for new visitor accommodation focused on the Town Centre, the Resort Core, and the defined holiday accommodation areas

unless exceptional circumstances justify a peripheral location outside of these areas".

4.2 Therefore, the principle of new holiday accommodation is considered acceptable in the Town Centre, Resort Core and defined holiday accommodation areas. However, whilst in principal these areas are acceptable there may be other material considerations, in particular impact on nearby residential amenity, which may weigh significantly against such a proposal.

4.3 Outside of these locations, planning permission for serviced holiday accommodation generally will not be granted.

4.4 The [Town Centre and Resort Core boundaries can be found on the Policies Map to the Local Plan](#).

4.5 There are six defined Holiday Accommodation Areas across the resort: The Cliffs; North Town Centre; South Town Centre; Foxhall; South Beach; and Pleasure Beach North. The [Holiday Accommodation Area boundaries can be found within the Council's Holiday Accommodation Supplementary Planning Document](#).

4.6 Extensive experience across the resort has shown that locating some forms of serviced holiday accommodation without on-site management alongside permanent residential accommodation is often a source of conflict. As such, when considering the acceptability of serviced holiday accommodation uses, even within the designated areas, the Council will be mindful of the size of the property (i.e. the number of people that it could accommodate), the size of communal spaces, the size of external areas and the relationship to other properties. Due regard will be given to surrounding uses, levels of background noise, and the general character of the area. It may be that large holiday houses with sizeable communal spaces and outdoor areas would not be supported in areas that have a quieter character with family accommodation in close proximity.

5.0 What standards will you have to meet?

5.1 Blackpool has enjoyed some incredibly successful seasons in recent years and has demonstrated one of the strongest post-pandemic recoveries in the country. We are also seeing the most significant public and private sector investment in the resort in a generation, amounting to some £2billion. In short, Blackpool would appear to be on the ascent after decades of decline in the 80s, 90s and early 00s. It is imperative that the Council works hard to continue this trend. Continuing to positively change visitor experiences and public perception of Blackpool as a holiday destination is paramount to continued success.

5.2 The Council's approach to the provision of high-quality holiday accommodation is central to its wider strategy and ambition for resort regeneration. The National Planning Policy Framework expects all new development to function well and add to the overall quality of an area over the lifetime of that development. It also expects development to deliver a high standard of amenity for existing and future users. The Framework sets out an overall expectation that the planning system creates high-quality, beautiful and sustainable buildings and places.

5.3 In order to achieve the provision of high-quality holiday accommodation, that meets modern visitor expectations and delivers a positive experience of Blackpool's resort offer, the Council expects holiday accommodation to meet its adopted standards for the provision of residential accommodation.

5.4 In terms of housing mix, Policy CS13 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 expects no more than 30% of any flat development to offer one-bedroom accommodation. This approach has been adopted to help rebalance the housing stock and prevent exacerbation of existing over-concentrations of small flat accommodation. Applying this standard to the provision of holiday accommodation will help to achieve three key benefits:

- It helps to prevent overly intensive development
- It ensures that a range of accommodation is available to meet visitor requirements, including that of families who are a key target demographic for the resort
- It provides flexibility for future use meaning that accommodation can function well and contribute to the quality of an area over its lifetime, minimising use of resources and improving sustainability

5.5 The Council will therefore expect one-bedroom units to make up no more than 30% of the total number of units for all proposals for serviced holiday flats.

5.6 With regard to floorspace and amenity standards, Policy DM5 of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies 2012-2027 states that:

"Proposals for the... change of use of existing buildings for residential use will only be permitted where... the proposed units are all fully self-contained and satisfy the National Described Space Standards (or any future successor). Proposals should also have regard to the Council's adopted standards".

5.7 To ensure high-quality holiday accommodation provision the Council will apply the standards set out in the Council's New Homes from Old Places Supplementary Planning Document, except where they have been superseded by the Nationally Described Space Standards for housing

5.8 This means that the [minimum gross internal floor areas and bedrooms of each unit must meet the national standards](#).

5.9 Communal space, i.e. the total floor area of main living/dining/kitchen areas, must meet the [New Homes from Old Places standard](#) (specified in the table at the bottom of page 18).

5.10 If planning permission is granted for serviced accommodation, conditions will be imposed to ensure the property is laid out, used and managed appropriately to provide quality accommodation. These will likely include a condition stipulating maximum occupancy based on the floorspace of the accommodation.

6.0 What external alterations might be necessary?

6.1 Many properties within the defined Resort Core and Holiday Accommodation Areas have been unsympathetically extended in the past through the addition of sun-lounges and roof-lifts. Many properties have also lost their external amenity space through the provision of side and rear extensions. Such extensions maximised the amount of space within the property that could be let out to visitors and, in the case of sun-lounges, provided an alcohol-free area or 'dry-lounge' as was once required under licence.

6.2 The conversion of a property to serviced holiday accommodation presents a unique opportunity for these unsympathetic extensions to be removed.

6.3 The removal of roof-lifts and rear extensions helps to reduce the density of development and thereby improves the quality of the living environment. The provision of outdoor space is particularly important for self-contained accommodation to facilitate family use and for the storage of waste.

6.4 Sun-lounges lack residential character and so should be removed. This expectation accords with the National Planning Policy Framework which expects the planning system to deliver high-quality, beautiful places, that add to the overall quality of an area and function well over their lifetime.

6.5 In light of the above, it is likely that any proposal for serviced holiday accommodation will need to include:

- Removal of roof-lifts and non-original dormers
- Removal of rear extensions to provide adequate outdoor amenity space
- Removal of front sun-lounges and the reinstatement of a traditional bay or residential frontage as appropriate with reference to the original architectural characteristics of the property and the wider streetscene

7.0 What if the requirements prevent your proposal from being financially viable?

7.1 The Council understands that commercial realities can sometimes pose a real challenge to development viability. Our objective is always to get the best quality development we can on a site. This means that we will always work proactively with developers to ensure that schemes in the public interest can come forward.

7.2 If you consider that financial viability would prevent you from meeting all of the requirements set out in this advice note, you may be able to justify alternative proposals by submitting an open-book financial appraisal. This would need to set out all of the costs involved in the conversion work. It would be reviewed on behalf of the Council by an experienced viability advisor and you will be expected to cover this fee. Please be advised that all financial information would be kept confidential and would only be shared with the Council's retained advisors. If viability is likely to be a concern, you may wish to take advantage of the Council's pre-application advice service to obtain a view on the likelihood of support for your proposal.

8.0 Submitting a planning application

8.1 A planning application for serviced holiday accommodation should include the following:

- [A completed application form](#)
- [The relevant fee](#)
- Location plan with the curtilage of the property outlined in red
- Existing and proposed floor layout plans
- Existing and proposed site plans
- Existing and proposed elevation plans (if external alterations are proposed)
- Noise assessment
- Management plan outlining:
 - arrangements for the storage and collection of waste
 - arrangements for the arrival and departure of guests
 - arrangements for the cleaning and servicing of the apartments
 - a means by which contact details for a managing agent can be displayed on the premises (to be readable from a public

vantage point)

- arrangements for the resolution of any issues that are identified to the managing agent
- the keeping of a register of guests (to include guest name and permanent home address) staying at the premises to be retained for at least 12 months and to be made available to the Council for inspection upon request

9.0 Some serviced holiday accommodation uses are trading without having planning permission, why is this the case?

9.1 The Council is aware that a great many properties in Blackpool that do not benefit from planning permission for serviced holiday accommodation use are available to rent as holiday accommodation.

9.2 The Council holds a register of unauthorised premises and is pursuing formal planning enforcement action on a risk and threat priority basis. This essentially means that we are tackling the most problematic properties first.

9.3 Dealing with unauthorised serviced holiday accommodation premises is one of the Council's biggest planning enforcement priorities and we are actively working with partner agencies to explore our options to enable a faster and more robust enforcement response.

9.4 If you would like to report an unauthorised serviced holiday accommodation use, please email planning.enforcement@blackpool.gov.uk. All enforcement complaints are confidential.

10.0 Further information

Pre-application advice

The Council offers a pre-application advice service. Applicant's wishing to develop serviced holiday accommodation may wish to take advantage of this service to establish the likelihood of planning permission being granted for their proposal and to understand any specific requirements that may be necessary.

[Details of this service](#)

Public consultation

As this document is intended as an advice note to provide clarification and information on the Council's approach to dealing with applications for serviced holiday accommodation, no public consultation has been undertaken on its content.

Sustainability appraisal

The Blackpool Local Plan, Parts 1 and 2, have both been subject to a sustainability appraisal. As such, there is no need for this advice note to be subject to a separate sustainability appraisal.

Habitats Regulations Assessment

Given the purpose, content and scope of this advice note, it is not considered to trigger a requirement for a Habitats Regulations Assessment (HRA).

Useful numbers

Development Management (Planning) 01253 476193

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