

BLACKPOOL LOCAL PLAN

PART 1: CORE STRATEGY

BLACKPOOL COUNCIL STATEMENT

MATTER 7

BLACKPOOL RESORT CORE

APRIL 2015

Blackpool Council



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Matter 7 – Blackpool Resort Core (Policies CS1, CS21, CS22, CS23)

Participants: Blackpool BC; Blackpool Pleasure Beach; Chadsley Hotel: Memphis Hotel

Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (SD001).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the Core Strategy. To assist document numbers are referenced where appropriate.

Position of the Council regarding Matter 7

7.1 Is the plan positively prepared, aspirational but realistic in terms of tourism accommodation and facilities?

7.1.1 The Council considers that the plan is positively prepared, aspirational but realistic in terms of tourism accommodation and facilities.

7.1.2 The Resort Core (defined on the Proposals Map AD008) is identified as one of Blackpool's strategic locations for development (Policy CS1) a key location for regeneration, recognising its pivotal role in driving the local economy. Policy CS21: Leisure and Business Tourism provides further policy direction for new high quality tourism attractions and holiday accommodation focusing the majority of new investment and development in the resort core, town centre and holiday accommodation areas.

7.1.3 The policy framework also recognises the important contribution to the resort of existing major attractions with Policy CS21 supporting improvement and enhancement which complements and reinforces their role and secures their long term future. Outside the Resort Core and Town Centre there are important facilities such as Blackpool Zoo, Stanley Park and Marton Mere Holiday Village and the policy allows for enhancement of these facilities where it would strengthen the wider resort offer and not undermine inner area regeneration.

7.1.4 The Resort Core is at the heart of the visitor economy in Blackpool and along with the Town Centre contains the majority of resort attractions and facilities, holiday accommodation and major points of arrival. It is the focus for visitors, both day-trippers and staying guests to the resort. The policy framework has evolved from work

undertaken for the Resort Masterplan (2003) (FEB005), the adopted Local Plan (2006) (AD007) and the Task Force Report Action Plan (2007) (FEB006); the Government Response (2008)(FEB007) to the action plan; and the Fylde Coast Visitor Accommodation Study (2009)(EB013). The evidence underpinning the policy framework for tourism and holiday accommodation is set out in more detail in the Council's response to Question 7.2.

7.1.5 To support the tourism aspirations for the resort, which is at the heart of the Vision for Blackpool and Goal 4 (Core Strategy EB001 pages 22 to 24), the Council considers that the strategic policy framework provides a realistic and appropriate approach which sets out the opportunities for development; guides new tourism investment to the most sustainable locations whilst supporting existing major attractions that make an important contribution to the visitor offer; and manages the reduction in the over-supply of holiday accommodation in guest houses, whilst providing opportunity for new accommodation which responds to visitor demands and provides an improved quality and choice to support a sustainable visitor economy.

7.2 Is the strategy of seeking to focus new tourism accommodation and facilities within the Resort Core/Town Centre soundly based and supported by relevant evidence?

7.2.1 The Council considers that the strategy for seeking to focus accommodation and facilities within the Resort Core/Town Centre is soundly based and supported by relevant evidence.

7.2.2 The context for the policy framework within the Core Strategy relates back to 2003 when the impetus for the regeneration of Blackpool was associated with Blackpool's bid to government to strengthen its visitor economy by hosting a regional casino. A "Vision for Blackpool" (FEB008) was approved by the Council as a summary for public consultation in March 2003 on emerging proposals for what became known as the Blackpool Resort Masterplan (2003) (FEB005).

7.2.3 The Vision provided a blueprint for the whole inner area of Blackpool and the Town Centre, to revitalise the resort's tourist economy and to provide new facilities for local residents/businesses that would promote a sustainable community. It identified key sites for redevelopment and major gateways into the town that needed improving. The resort core and town centre were at the heart of the blueprint. At the time a considerable amount of local consultation was carried out on the proposals. The key spatial elements of the Blackpool Resort Masterplan were drawn into the Blackpool Local Plan 2001-2016 (adopted in 2006) (AD007).

7.2.4 When Blackpool's bid for a regional casino licence was unsuccessful, the Council sought to rethink its regeneration strategy and a multi-agency Task Force was set up to review economic, social and environmental plans for regenerating Blackpool, including those set out in the Blackpool Resort Masterplan. In July 2007 the Blackpool Task Force put forward an Action Plan for Sustainable Growth (FEB006) to re-establish Blackpool as a vibrant prosperous sub-regional centre of the Fylde Coast with a unique 21st century resort offer

for the benefit of the town, region and nation; and to maximise the cost-effectiveness of public expenditure, to increase private-sector confidence and maximise private sector investment. The action plan recognised that tourism and leisure would continue to be the primary driver of the town's economy but set within the context of a more diversified economy, with sustainable communities and a high quality environment.

- 7.2.5 Key strands of the action plan included investment related to the resort core, town centre and holiday accommodation, to be tackled through three mutually reinforcing themes - revitalising business and enterprise; transforming access, infrastructure and the environment; and creating sustainable communities. The review established that the Leisure Quarter strategic site (the former Central Station and location of the main casino development in the Vision 2003) should remain the focus for seeking investment to strengthen the resort's visitor economy, along with seafront transformation and upgrading of the holiday accommodation sector. The Task Force also advocated that much more emphasis should be put on addressing Blackpool's housing market failure and neighbourhood decline, which is intrinsically linked to the over supply of guest house accommodation in the inner areas, by establishing sustainable communities through housing-led regeneration.
- 7.2.6 The Task Force report had local, regional and national backing with the Government's response set out in their February 2008 response report (FEB007) supporting the key strands and emphasising the commitment of Government through various funding streams to the regeneration of Blackpool.
- 7.2.7 The strategic direction from the Task Force report; the past work undertaken with respect to the Masterplan and adopted Local Plan and the focus of investment both past and current has provided a strong policy direction which has informed the strategic direction and policy framework in the Core Strategy with respect to the Resort Core, Town Centre and holiday accommodation.
- 7.2.8 The proximity of attractions, other facilities and holiday accommodation in the Resort Core makes it a highly sustainable location for tourism investment. In economic terms - targeting investment and development in the Resort Core will underpin past and current investment and act as a catalyst for further investment maximising the benefits to visitors and the tourism economy; in social terms some of the most deprived areas in the Borough lie within the resort core, investment will provide job opportunities to the local residents seeking to get a foot hold in the job market; and in environmental terms the proximity of attractions other facilities and accommodation means they are conveniently accessible on foot, cycle and by public transport (tramway and bus).
- 7.2.9 Blackpool Town Centre is the location for the iconic Blackpool Tower and other historic attractions including The Winter Gardens. The latter is the world's most complete Victorian all weather complex of theatres and conference facilities and is identified as a strategic site along with the Leisure Quarter site, (the former Central Station site). The Leisure Quarter site is Blackpool's most strategically important development site which

has the potential to become a wider catalyst for regeneration, strengthening the leisure offer and visitor economy.

- 7.2.10 Three decades of decline in visitor numbers has meant that large parts of the Resort Core have become associated with a poor quality low-value offer which does not appeal to the 21st Century tourist market. The overriding need therefore is to raise the quality in all aspects of the visitor experience in Blackpool. Investment has already and is taking place. Over recent years there has been significant public sector investment in the resort including the Resort Core and adjacent Town Centre. Over £300m has been invested in the promenade upgrade including the Tower Festival Headland Comedy Carpet, sea defences and tramway upgrade. Around £26m has helped to secure a portfolio of key assets in the Town Centre including the Tower, Winter Gardens and property purchases on the Leisure Quarter site through ERDF, NWDA/HCA funding and prudential borrowing by the Council. Further investment in the town centre public realm has taken place through the Brilliance and St. John's Square projects.
- 7.2.11 Current and future investment continues to support the Town Centre and Resort Core to underpin and capitalise on past public investment to ensure the development of a sustainable visitor economy. Central Government and the Lancashire Enterprise Partnership (LEP) support continues through the Growth Deal (FEB009) (in **Supporting the renewal and growth of Blackpool**). This Deal confirms central governments commitment to Blackpool and delivers a significant and broad ranging package of measures to support the renewal and growth of Blackpool and is seen as an important stepping stone towards self-sustaining economic growth.
- 7.2.12 The Growth Deal for Blackpool includes continued investment within and to support the Resort Core and Town Centre including a new visitor heritage attraction within the Winter Gardens; support to release the Leisure Quarter site for development; and local transport improvements to support the Town Centre, promenade and key gateway corridors. In addition the Deal also importantly includes supporting the council to address the local housing market, through improved standards in the private rented sector which is intrinsically linked to managing the reduction in holiday accommodation. In support of this deal, the LEP is investing over £22m and Blackpool Council is also committing the necessary revenue to develop the robust business cases for the regeneration and housing related asks.
- 7.2.13 The Growth Deal acknowledges that the social challenges in Blackpool are multifaceted and deep seated and will take time to address and to ensure that Blackpool and the LEP receive the support they need from Whitehall to deliver and build on this deal, it has been agreed that Greg Clark, Minister for Cities, will hold 6 monthly ministerial meetings with the Local MPs, the Leaders of Blackpool Borough Council and the LEP. In addition and most recently, £2m has been successfully secured for the Lightpool Project through the Coastal Communities Fund to develop stronger links through an illuminations project between the visitor and town centre economy in the vicinity of Blackpool Tower.

Holiday Accommodation

- 7.2.14 Holiday accommodation is an integral part of Blackpool’s tourism offer and is vital to the resort’s visitor economy. In the late 1960s seaside resorts still accounted for 75% of all holidays and completely overshadowed holidays abroad. From the 1970s onwards the increasing range, affordability and accessibility of leisure destinations both at home and abroad presented traditional coastal resorts with increasingly fierce competition. For many traditional resorts, changing consumer preferences and failure to keep up with a modern tourist market resulted in a slow decline with the contribution of seaside resorts to UK tourism falling significantly. As the largest of the seaside resorts the effect on Blackpool has been profound.
- 7.2.15 As a seaside resort that owes its very existence to tourism, holiday accommodation has always dominated the resort. The effects of falling visitor demand and occupancy levels has had profound destabilising effects on the accommodation sector, most of all through the increasing use of former holiday accommodation to provide low quality private rented accommodation.
- 7.2.16 By the mid/late 1990s it had become starkly apparent that authorised changes of use from holiday accommodation to permanent residential use were merely “the tip of a larger iceberg” with many supposedly holiday establishments taking permanent tenants. It was recognised that there was a pressing need to establish the true extent of contraction in the holiday accommodation stock, to develop a better understanding of the forces driving change and to consider how future contraction could be managed so as not to undermine the holiday accommodation sector and local residential communities.
- 7.2.17 To update the well documented evidence on holiday accommodation that had informed the 2006 adopted Local Plan, Humberts Leisure consultants were jointly commissioned by Blackpool, Fylde and Wyre Councils to undertake the Fylde Coast Visitor Accommodation Study (EB013). The aim of the study was to assess the supply of bed spaces in serviced hotels and self-catering accommodation in relation to the demand for staying visitors (EB013). The study assessed the current need for visitor accommodation, considered future scenarios and undertook an appraisal of planning policy highlighting future considerations.
- 7.2.18 The review of planning policy and implementation revealed that :
- There is such an oversupply of holiday accommodation that holiday apartments and guest houses are drifting into quasi and fully residential use without applying for planning permission, or potentially by applying for conversion to holiday accommodation apartments a way of circumventing Policy RR9 of the adopted Local Plan (AD007);
 - There are a significant number of applications coming forward to change use from holiday to residential use, but this does not reflect the scale of over supply. This may be

because those in resort neighbourhoods feel that permission is unlikely to be forthcoming;

- There is a fundamental need to re-balance the supply of bed-spaces and enable a pathway out of holiday accommodation which aims to deliver a positive residential alternative, whilst still encouraging new quality replacement accommodation in appropriate locations.
- The resort neighbourhoods are drawn so large that they no longer provide any realistic relationship with what is considered the main areas of holiday accommodation.

7.2.19 The findings of the Study suggested more tightly focused resort neighbourhoods, concentrating protection of key conference and resort hotels on the promenade and upon the strongest remaining areas of guest houses.

7.2.20 In response to the Study and to manage the oversupply of bed spaces, a more flexible policy framework than previously set out in the adopted Local Plan has been developed in the Core Strategy which allows more guesthouses to change to residential use than previously. The policy seeks to retain a suitable level of guest accommodation by identifying Holiday Accommodation Areas and promenade hotel frontages in sustainable locations (with easy access to resort facilities and key transport routes and facilities) where change of use to other uses is restricted unless exceptional circumstance can be demonstrated. Outside these areas, guest houses in principle can change to residential use.

7.2.21 Extensive consultation was undertaken as part of the preparation of the Core Strategy to determine the most appropriate way forward in managing the reduction in holiday accommodation. As a first step public consultation was undertaken on options set out in the Core Strategy Issues and Options document June 2008 (AD017) to gain people's view in broad terms as to which parts of the resort have the most potential to continue to be successful as holiday accommodation and which areas would benefit from change. Further consultation was undertaken in 2010 on the Core Strategy Preferred Option (AD013 including Appendix A) including consultation on a Holiday Accommodation SPD which set out proposed detailed boundaries of holiday accommodation areas (AD013 Appendix A). Both of these documents were informed by the Issues and Options consultation and the Visitor Accommodation Study. A Consultation Statement on the Holiday Accommodation SPD (FEB010) sets out further details on the SPD consultation providing a summary of main issues and responses and recommendations.

7.2.22 The Core Strategy Revised Preferred Option and Proposed Submission documents saw further refinement to policy in response to public consultation (SD010, SD011 and SD012) to clarify and simplify policy wording to assist the understanding and future monitoring and review of this aspect of policy.

7.3 Is there potential conflict between policy CS4, which states that town centre uses will be permitted outside centres only if the criteria (a) – (d) are met and policy CS21 which states that tourism attractions will be supported in the town centre and resort core? Should the policies or their supporting text be modified to give clearer guidance on the type of main town centre uses which will be permitted outside of the Town Centre but within the Resort Core? (see also Matter 4)

7.3.1 Please see response to Matter 4, Question 4.3.

7.4 Does policy CS21 (2) provide sufficient support for enhancement/expansion of existing tourism facilities outside of the Resort Core/Town Centre?

7.4.1 There is an overriding need to raise quality in all aspects of the visitor experience in Blackpool, focusing investment and development within the established resort core and town centre, where regeneration and positive change is most needed. However the Council also recognises the vital role that existing tourism facilities play in making the town an attractive place visit.

7.4.2 Policy CS21 provides the strategic policy approach to tourism facilities. Outside of the resort core and town centre, the Council will support new tourism investment that is predominantly focused on existing outdoor leisure and recreation facilities which strengthens the wider resort offer and does not undermine resort regeneration.

7.4.3 Further detail is provided in paragraph 7.35 of the supporting text. Away from the Resort Core, leisure development opportunities should focus on the enhancement of existing facilities which largely meet outdoor leisure and recreation need, including Blackpool Zoo, Stanley Park and Marton Mere Holiday Village. These provide important leisure facilities for quieter enjoyment which are different to the Resort Core, but complementary to Blackpool's leisure and tourism offer as a whole.

7.4.4 The policy and supporting text discussed above is clear in its support for existing tourism facilities providing sufficient guidance for the enhancement/expansion of those tourism facilities outside of the Resort Core/Town Centre.

7.5 Is it appropriate for the main holiday accommodation areas against which policy CS23 would be applied to be set out in the Holiday Accommodation SPD (which is not subject to independent examination) as opposed to in a Local Plan document? If so should these areas be set out in the Core Strategy or the Site Allocations document?

7.5.1 The Council considers that it is appropriate that the main holiday accommodation areas be set out in the Holiday Accommodation SPD.

- 7.5.2 It has been a priority of the Council to update the policy framework for managing holiday accommodation in the inner areas of the resort. Without an updated approach planning decisions would have continued to be based on wider holiday area boundaries and outdated policies which are inconsistent with the required approach to uplift standards and manage change in the inner areas.
- 7.5.3 The social, environmental and economic challenges facing the inner areas are complex and inter-related, requiring a multifaceted approach not only recognised by the Council and its partners, but also by Central Government (paragraphs 7.2.4 to 7.2.13). As part of this approach, an up to date flexible and robust planning framework was needed that would directly address the land use aspects of the problem and importantly support the other initiatives being implemented in the inner areas to establish desirable sustainable neighbourhoods where people choose to live.
- 7.5.4 The Council considers that the policy approach of setting out the strategic policy in the Core Strategy (Policy CS23 – Managing Holiday Bedspaces) supported by further detail in the SPD complies with paragraph 153 of NPPF and government advice in paragraph 028 of NPPG (reference ID: 12-028-20140306). The SPD does not comprise allocations but is a tool to enable the application of policy to be understood in managing the reduction of holiday accommodation within the inner areas. The SPD builds upon and provides more detailed guidance on policy to assist applicants in making successful applications. It does not place unnecessary financial burdens on development in that it merely provides locational guidance.
- 7.5.5 The policy framework provides a positive approach to managing holiday bed spaces, safeguarding fewer holiday properties within the specified geographical areas (some 800 as opposed to 1600 in the Resort Neighbourhoods in the adopted Local Plan). Outside these areas existing holiday accommodation can continue or can change to residential use (the latter subject to the New Homes from Old Places SPD), thereby assisting in rebalancing the housing offer in the inner areas providing a greater choice and quality of homes whilst at the same time safeguarding the most sustainable areas for holiday accommodation. This approach provides more certainty for developers and property owners compared to the criteria based policy (Policy RR9 – Resort Neighbourhoods Development Proposals Involving Loss of Holiday Accommodation) in the adopted Local Plan. RR9 in essence presents a complex policy, both difficult to interpret and implement.
- 7.5.6 The Council also considers that the policy approach set out in Policy CS23 and the SPD provides greater flexibility particularly in two aspects firstly more hotel properties in principle can change to residential use helping to reduce the oversupply of bed spaces; and secondly being able to respond more quickly and effectively to changing circumstances whether that be economic, political or through issues emerging as a result of monitoring policy.
- 7.5.7 In addition the Council is satisfied that this aspect of the Core Strategy is consistent with the relevant legal requirement under the 2012 Local Planning Regulations in that the

Regulations do not require the geographic area to which a policy applies to be defined in the development plan itself. The approach the Council has adopted can be compared with the position of conservation areas for example, which are subject to Policy CS8 the areas themselves not defined in the Core Strategy. With respect to this, the Council also considers that as the purpose of the SPD is not the allocation of sites it would be inappropriate to define the areas in the Site Allocations DPD.

7.5.8 The Council considers that the policy approach is effective in that since the adoption of the SPD in March 2011 the number of applications for conversion of holiday accommodation to residential has risen with the average number of applications doubling in number to around 40.

7.5.9 In addition it is also important to emphasise that the SPD has been adopted since March 2011, was not subject to legal challenge and has since been relied upon by various inspectors in appeals without being called into question

Preparation of the SPD

7.5.10 The preparation of the SPD complied with the requirements for producing SPDs as set out in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). A comprehensive and aligned consultation approach was adopted in developing the SPD and the Core Strategy policy many of the consultation methods and events combined.

7.5.11 Extensive consultation was undertaken as part of the preparation of the Core Strategy to determine the most appropriate way forward in managing the reduction in holiday accommodation. Options were set out in the Core Strategy Issues and Options document June 2008 (AD017) to gain people's view in broad terms as to which parts of the resort have the most potential to continue to be successful as holiday accommodation and which areas would benefit from change.

7.5.12 Further consultation was undertaken in 2010 on the Core Strategy Preferred Option (AD013) and included in the Preferred Option document at Appendix A, was the draft Holiday Accommodation SPD which set out proposed boundaries of holiday accommodation areas and formed part of a combined consultation stage. A second round of consultation on the SPD was undertaken in November /December 2010 to consult on the amendments that had been made in response to the first round of consultation in May to June 2010. Further amendments to the SPD were made in response to the November/December 2010 consultation following which the Council adopted the SPD in March 2011.

7.5.13 Details of the consultations undertaken on the SPD are contained in the Consultation Statement on the Holiday Accommodation SPD (FEB010) including the Council's response to the public consultation; the strategic approach; an overview of the proposed holiday

accommodation areas; the review of boundaries; and the proposed changes that were made in response to the consultation stages.

7.5.14 The public consultation was successful in engaging with businesses and residents across the holiday accommodation areas attracting 300 comments with exhibitions attended by over 250 people. Following consultation a substantial number of the concerns and objections to the boundaries were addressed. The Council considers that through the development of strategic policy in the Core Strategy Policy CS23 supported by an SPD, the Council has adopted an appropriate approach in developing a policy framework which has been subject to several rounds of consultation to ensure that the most appropriate boundaries have been identified.

7.6 Are the main holiday accommodation areas appropriately defined having particular regard to Palatine Road?

7.6.1 The Council considers that the main holiday accommodation areas including certain sections of Palatine Road are appropriately defined. Extensive consultation was undertaken on the broad areas and subsequent detailed holiday accommodation areas. A Consultation Statement (FEB010) has been published which sets out the Council's approach to consultation; the Council's response to the consultations including the strategic approach, an overview of the proposed holiday accommodation areas the review of boundaries and the proposed changes that were made in response to the two stage public consultation.

7.6.2 Public consultation was successful in engaging with businesses and residents across the holiday areas, attracting over 300 comments, with exhibitions attended by over 250 people. The first round of consultation provided a range of responses which generally supported the proposed approach, but highlighted a range of concerns from consultees, with a number of specific objections to the detailed boundaries proposed.

7.6.3 In response to this the Council made substantial proposals for changes to the boundaries of the main holiday accommodation areas. There were fewer changes following the second round of consultation. Changes in both instances were focused on those streets where the public consultation was concentrated. Any proposed extension of the main areas was founded on the basis of further change to residential use could effectively be resisted. The proposed changes to the boundaries were put forward on this basis. The focus was not always on the best properties, although this was a key consideration, but it was about the potential future strength of the area having regard to the overall demand and supply of holiday accommodation in each location and whether it lent itself towards safeguarding holiday use or a more mixed holiday/residential future.

7.6.4 With specific reference to Palatine Road. Parts of Palatine Road lie within the 'South Town Centre' Holiday Accommodation Area in the SPD. In the first draft SPD consultation, no part of Palatine Road was included in a Holiday Accommodation Area. However, following

the first round of consultation in May – June 2010 specific issues were raised by some hoteliers regarding the omission of Palatine Road from the South Town Centre Holiday Accommodation Area. Taking into account the representations received and those issues referred to in paragraph 7.6.3, parts of Palatine Road were included and put forward for a second round of consultation in November/December 2010. Following the 2nd consultation some representations were received regarding the exclusion of certain sections but no further changes were made. Specific details on the representations received including from Hoteliers and Ward Councillors regarding Palatine Road and the Council’s proposed recommendations are set out on pages 36 to 39 of the Consultation Statement (FEB010).

7.6.5 From the two stage public consultation, the general support and desire for the wider South Town Centre area to remain in holiday use was evident, however streets located further from the town centre demonstrated some level of decline in holiday use, giving way to some residential use in streets such as Reads Avenue and Palatine Road. It was considered by the Council that the presence of these other uses within the streets reduces the Council’s ability to confidently safeguard holiday use in these streets. However in recognition of the strong support by a number of hoteliers and the strength of the holiday accommodation offer on certain sections of Palatine Road, the proposed South of Town Centre main holiday accommodation area was extended to include sections of Palatine Road as set out in the adopted SPD (page 19).

7.6.6 Inevitably, while not everyone will support the final outcome, there remains clear recognition and support for the need to rationalise and improve the holiday accommodation offer in Blackpool and as detailed in the Consultation Statement it can be seen that the Council addressed a substantial number of the concerns and objections to the detailed boundaries.

7.7 Should the part of paragraph 7.39 concerning car parking be included in policy CS22 itself? Would the policy as currently worded enable refusal of a development on an existing car park which would undermine the resort’s ability to accommodate visitor trips? (see also Matter 5)

7.7.1 Policy CS22 provides the policy framework for the Key Resort Gateways. Blackpool has a number of key resort gateways leading into the town centre and resort core (identified in paragraphs 7.37 and 7.38 of the supporting text to the policy), presenting many visitors with their first impression of the resort. Improvement and enhancement of these key visitor routes will help to create a positive resort arrival experience, complement regeneration efforts elsewhere within the resort and stimulate further investment in the adjoining holiday and residential areas.

7.7.2 Complimenting policy CS22 is Policy CS5: Connectivity which applies borough-wide. It makes specific reference to parking, stating a sustainable, high quality transport network for Blackpool and a quality arrival experience will be achieved by addressing town centre

parking capacity issues by providing sufficient, high quality and conveniently located car parks, to support the town centre and resort economy and address wider issues of parking provision across the Borough.

- 7.7.3 It should also be noted that policy AS1 of the current Local Plan (AD007) sets out general development requirements with respect travel and transport and requires appropriate levels of parking to be provided in accordance with the adopted standards. The policy is currently saved but will be replaced by policies in the Local Plan Part 2: Site Allocations and Development Management Policies Document.
- 7.7.4 One of the Core Strategy objectives is to sustain a high quality visitor offer. In order to do this, the Council recognises it needs to maximise accessibility to the resort for visitors. Inherent in policies CS22: Key Resort Gateway and CS5: Connectivity is the recognition that priority to improve car parking for visitor and residents. The Council would not accept development that would have a detrimental impact of the resort's ability to accept visitor trips.
- 7.7.5 It is considered CS5 provides the appropriate policy framework in relation to parking and could be used to enable refusal of a development on an existing car park which would undermine the resort's ability to accommodate visitor trips. However, if the Inspector is minded to make a modification to include the reference in paragraph 7.39 as part of the policy instead of the supporting text, the Council will support this.