



HOLIDAY ACCOMMODATION

Supplementary Planning Document

Consultation Statement

March 2011

1. Introduction

- 1.1. This report sets out the details of the public consultation on the Council's *Draft Holiday Accommodation SPD* in line with *The Town and Country (Local Development) (England) (Amendment) Regulations 2004 (as amended, 2008, 2009)* and the Council's Adopted *Statement of Community Involvement*.
- 1.2. The statement the consultation undertaken; who was consulted; and provides a summary of the main issues raised during the consultations; and in response sets out recommendations for changes to the proposed Holiday Accommodation Supplementary Planning Document.

2. Public Consultation Process

First Round of Consultation – May to July 2010

- 2.1. Consultation on the Holiday Accommodation Supplementary Planning Document (SPD) complemented wider consultation on future planning policy for the holiday areas in the Blackpool Core Strategy, with many of the consultation methods and events combined.
- 2.2. Consultation on the SPD began on 24th May 2010 and ended on the 5th July 2010. Consultation on the Core Strategy Preferred Option beginning 10th May and was extended to the end of July 2010 to take into account Council Area Forums which occurred during July. It coincided with consultation on the complementary *New Homes from Old Places SPD*, focusing on residential conversions and sub-divisions.
- 2.3. The documents and comments forms were made available to view at the Council's main offices, the Enterprise Centre, Solaris Centre, at all libraries in the Borough, and online. Extensive publicity was given to consultation in the local press (Evening Gazette) and in 'Your Blackpool' (a Council publication sent to all households in the Borough), and letters were sent to all statutory consultees and other interested stakeholders.
- 2.4. Through the Council's online Consultation Portal, all statutory and non-statutory consultees on the Local Development Framework database were sent an email notifying them of the consultation and inviting them to make comments. This email provided a link to the Draft SPD and the facility to make comments on the document.
- 2.5. Documents and detailed information were also provided on the Blackpool Council Website (www.blackpool.gov.uk/holidayaccommodation) informing Blackpool residents and council staff of the consultation arrangements and providing electronic copies of all documents and detailing how, where and when people could respond.
- 2.6. Leaflets were also hand delivered to properties across the Resort Neighbourhoods (as defined in the Blackpool Local Plan 2006) providing information on the SPD and where and when public exhibitions were to be held.
- 2.7. **Exhibitions** were held at six venues across the holiday areas with the opportunity for consultees to complete questionnaires and to also speak to council officers from a range of departments including Planning, Enforcement, Housing and Accreditation.



Figure 1: Core Strategy and Holiday Accommodation Public Exhibition:
South Beach, St Peter's Church, Lytham Road.

- 2.8.** Council planning officers were also present at all seven July **Area Forum** 'Market Places', with the holiday areas the main focus for discussion on the agenda at the Revue and Gateway Area Forums. Details of publicity and consultation are set out in **Appendix 1**.
- 2.9.** To encourage feedback, responses were invited in a range of formats and the approach taken has been to assess all views put forward, determining whether comments relate to the Core Strategy or SPD as appropriate. All who responded to consultations who requested to be updated or who were directly affected by any proposed changes were kept informed at each stage of the documents production.

Second Round of Consultation – November to December 2010.

- 2.10.** Following the first round of public consultation, a number of amendments were made to the proposed holiday area boundaries. A period of further consultation was therefore undertaken for 4 weeks on the Draft Holiday Accommodation SPD *Consultation Report (October 2010)* between 8th November 2010 to 6th December 2010. Letters were sent to all who had previously responded, had asked to be updated, or who were directly affected by the proposed changes set out in the Consultation Report, and emails sent to all on the Local Development Framework consultation database (over 900 consultees contacted by email).
- 2.11.** The letters included details of where documents could be viewed, how people could respond and set out the next stage. Six letters tailored to the different holiday areas were sent out providing specific plans and comments forms for the consultees within the six proposed holiday areas. A general letter was sent to those who had responded to the previous consultation but lived outside the holiday areas. (An example of the letter, plans and comments form can be found in appendix 1).
- 2.12.** Publicity was also given to the revised proposals in the Blackpool Evening Gazette on the 28th October 2010, detailing the positive response of some consultees to the outcome of the initial consultation.

3. Public Consultation; Assessment of Responses

Summary of Consultation Responses

- 3.1. Consultation on the Core Strategy and Holiday Areas attracted substantial interest in the local press, and at the exhibition events and Area Forums. From the first round of public consultation a total of 192 written responses were received from hoteliers, residents, statutory consultees and interested parties, and a further 152 written responses received following the second round of consultation.
- 3.2. There was limited comment on the broad strategic policy approach or on the proposed promenade holiday areas. Respondent's concerns were overwhelmingly focused on the proposed main holiday accommodation areas off the promenade, and particularly on the detailed revised boundaries and the potential implications of increased changes to residential use in the proposed mixed neighbourhoods.
- 3.3. It was evident there was some lack of understanding about the purpose and impact of the proposed holiday area boundaries. As well as planning policy decisions on future change of use, there was concern that they may provide the basis for wider decisions about future marketing, promotion and funding of the holiday areas.

Main Concerns Raised

- 3.4. Responses focused on detailed boundary issues and were generally concentrated on certain streets, rather than dispersed across the holiday areas. The main concerns raised were:
 - General recognition that there are too many holiday premises and a surplus of low quality holiday accommodation.
 - The need to improve standards and levels of accreditation.
 - Problems generated by multi-flatted properties, the use of holiday premises as Houses in Multiple Occupation (HMO) use, and the need for stronger enforcement.
 - Concerns regarding changes in the character of the holiday areas
 - Comments on a street by street basis, mainly opposing being outside the proposed holiday areas, but there was not always a consensus, with some preferring the flexibility of being within a mixed neighbourhood.
 - Support from those within the proposed holiday areas.
 - A wide perception that mixed neighbourhoods do not work, often because of issues generated by problem HMOs.
 - Concerns many properties are too large to convert into family homes and, where properties can be converted, concerns over the cost of the proposed standards.
 - The effect on property and business values outside of the proposed holiday areas.
 - Concerns the development of new budget hotels is having a negative impact on guesthouses and B&Bs.

Consultation Responses by Area

3.5. The general concerns and issues were supplemented by a number of ‘street-specific’ comments raised relating to individual areas set out below, with many streets receiving little or no comments, but a few receiving many comments. The table below presents the key street specific issues raised from each of the consultation periods and how these are addressed in the final version of the SPD. Further details of the rationale for the decisions taken on each issue is set out in **Appendix 2**.

Table 1: Key Streets-Specific Issues

Holiday Area	First Round of Consultation May to July 2010		Second Round of Consultation November to December 2010	
	Issues Raised	Action Taken	Issues Raised	Action Taken
Norbreck Bispham and North Shore Cliffs	The omission of Gynn Avenue and Wilshaw Road from the proposed Holiday Area.	Include part of Gynn Avenue in the holiday area.	Removal of the Promenade between Gynn Square and Warley Road	No change
North of the Town Centre	The merits of the inclusion of Lord Street in the holiday area and the exclusion of Banks Street and Pleasant Street.	Include part of Banks Street in the holiday area,	Removal of part of Lord St. Inclusion of part of Banks St	No change No change
South of the Town Centre	The omission of Reads Avenue, Palatine Road, Havelock Street, small sections of Coronation Street, and Leopold Grove from the Holiday Areas.	Include parts of Reads Avenue and Palatine Road to the holiday area.	Exclusion of sections of Reads Ave and Palatine Rd. Exclusion of Coronation St. Exclusion of Leopold Grove Exclusion of Havelock St.	No change No change No change Include south side
Central Promenade and Foxhall	Limited issues about the proposed boundaries, with concerns focussed on uncertain future and, in particular, Tyldesley Road - with doubts about funding provision for the remodelling of this area.	No changes required.	The exclusion of one property on the Promenade. Issue regarding the mix of uses on Bairstow Street.	Include the property. No change
South Beach	Concerns regarding the omission of Alexandra Road and Lonsdale Road from the proposed holiday areas.	Include part of Alexandra Road to the holiday area	Exclusion of Lonsdale Road from the holiday area.	No change
Pleasure Beach	Concerns regarding the omission of Dean Street and sections of Station Road, Withnell Road and Osborne Road east of Bond Street.	Include part of Dean Street in the holiday area.	Removal of parts of Osborne/ Balmoral/ Station Roads and Bond Street Retention of the Blackpool South Travelodge Retention of Bourne Crescent. Inclusion of Henson Hotel (Clifton Dr /Burlington West)	Include parts of Osborne and Balmoral Road No change No change Exclude from holiday area.

- 3.6.** As stated previously, details of publicity and consultation are set out in **Appendix 1**. A full summary of the responses received during both public consultations from each of the six areas is set out at **Appendix 2**, including a full schedule summary of all the representations and the consultation events held in each area in **Appendix 3**.

4. Blackpool Council: Response to Public Consultation

Strategic Policy Approach

- 4.1.** The broad policy approach outlined for the promenade and holiday areas was generally supported. The main concerns were focused on the implications of increased changes to residential use in the proposed mixed neighbourhoods and the detailed planning policy boundaries.
- 4.2.** Both ‘no boundary’ and ‘retaining a wide boundary’ approaches have previously been considered as alternative ways forward, as set out in the Core Strategy Preferred Option. These approaches would give less certainty and clarity of the Council’s future policy and how it would impact on planning decisions across the resort, or of the scale and direction of change sought in different areas in the Core Strategy plan period from 2010 to 2026.
- 4.3.** A market based approach with ‘*no boundaries*’ would be in direct conflict to the strong and more widely held view that some holiday areas should continue to be safeguarded in holiday use.
- 4.4.** At the other extreme, to continue with ‘*widely drawn boundaries*’ is no longer realistic, following all the changes that have occurred in the holiday areas in recent years, providing no real guidance as to the direction of change or any certainty about the way forward in different areas.
- 4.5.** In these terms, the focus of this report in response to public consultation is not on broad policy issues - but is on potential changes to detailed boundaries in response to the main concerns raised by respondents across different areas of the resort. These are discussed in detail below.

Overview of Proposed Holiday Areas

- 4.6.** The key determinant of the Council’s response and recommendations is on identifying those streets and areas where not only the holiday future can continue to be safeguarded, but potentially strengthened and increased.
- 4.7.** The focus of “planning policy” is about guiding Council decisions on future planning applications for change of use. It is about identifying those areas where, in principle, there is not only a shared desire to see a strengthened holiday accommodation sector, but also confidence planning decisions can be upheld to secure a long term future in holiday use.
- 4.8.** The consultation about future planning policy has given voice to a number of strongly held wider concerns about the future marketing of the holiday areas and about the impact of changes in the holiday boundaries on the value of businesses and the sale price of properties. The future planning policy boundaries will have no impact on the Council’s future marketing of holiday areas. Accredited holiday accommodation spread across all parts of Blackpool will continue to be equally promoted, irrespective of any planning policy boundaries.

- 4.9.** It is also equally the Council's firm view that the value of businesses are determined by much wider issues. Fundamentally, it is their management, goodwill, appearance, successful marketing and, most particularly, evidence of recent business turnover and performance which, along with their location, impact direct on business values - all of these factors being particular to individual properties.
- 4.10.** The success of properties is also affected by wider national factors – with increased mobility and choice, raising aspirations, and increasingly intense competition from home and abroad all having resulted in long term changes in the pattern of holidaymaking, with a significant decline in British seaside resort holidays.
- 4.11.** Planning policy does, however, impact on the holiday accommodation sector in two clear ways:
- The degree of success of Blackpool's future development strategy and steps taken by the Council, by ReBlackpool (now the EDC), and by the private sector to uplift quality and to bring major new investment into the resort and town centre, all combine to support and act as a catalyst for further investment in holiday accommodation and the wider tourist economy.
 - Secondly, the decline in seaside holidays has led to many changes in the character of the holiday areas, and most specifically the growth in multiple flatted premises. These changes are made by owners not by the Council, but the success of the Council in seeking to manage change and resist the worst bad neighbour uses impacts on the attractiveness of remaining holiday areas.
- 4.12.** The fundamental concern at the crux of many of the consultation responses is that being placed outside the holiday areas will open the doors to more problem multiple residential uses. It is apparent that in those streets where most representations have been concentrated there is much uncertainty.
- 4.13.** In essence the Council's proposals seek to manage change and restore confidence by:
- Securing and safeguarding holiday accommodation where it has a long term future.
 - Significantly uplifting the required standards of new residential accommodation
 - Increasing enforcement activity and clamping down on unlawful, contrary, and poorly managed uses which have an adverse impact on the area.
- 4.14.** In all these terms, these measures in the long term can only help to enhance and support remaining businesses - but to what extent will depend on their success in implementation. Any proposed changes can in the short term fuel concerns, but property values are undermined and challenged by the poor character, appearance and impact of adjoining and nearby premises. They can only be helped, not hindered, by steps taken to address these issues.
- 4.15.** It is a fact that with a surplus of holiday accommodation premises on the market, Blackpool property values have clearly declined, but this was happening already and ultimately successfully managing change will have a positive impact across the whole resort.
- 4.16.** Bad neighbour uses, planning loopholes, limitations in the perceived effectiveness or ability of the Council to take effective enforcement action are recognised concerns which undermine public confidence, and the Council wants to do all it can to engage with business interests to address these issues and better develop a shared understanding of the way forward across the holiday areas.

- 4.17.** What is also abundantly clear is that if there is no longer a successful enough market to sustain holiday use, then changes will occur and there is already a very mixed pattern of uses across many of the holiday area neighbourhoods. The Council's firm conclusion can therefore only be that mixed neighbourhoods must be made to work if the future of many of these areas is to be secured.
- 4.18.** Where there is a strong land use basis, wide community support and, most essentially, confidence that the Council can continue to be successful in resisting further change to residential use, then holiday use remains supported as the best way forward – but future planning policy must also seek to ensure that mixed neighbourhoods work well and offer a very positive alternative.
- 4.19.** The need is to gradually transform these areas and focus on the undoubted advantages. Their convenience, attractiveness, near seafront location, colour and activity, and the greater ambience of more accredited holiday accommodation and better quality residential premises can all support a shared future for more mixed neighbourhoods.
- 4.20.** The overall aim of future policy is to create a mixed future which does work, with a move away from high density, low quality HMOs which have permeated the holiday areas and towards a focus on creating quality family housing which coexists with a concentrated, high quality holiday accommodation offer. Policy will allow greater flexibility for holiday accommodation properties and conversions into residential use, and must meet the standards set out in the *New Homes from Old Places* SPD.

Review of Boundaries

- 4.21.** Following the first round of consultation, the Council made substantial proposals for changes to the boundaries of the main holiday accommodation areas, but there were fewer changes following the second round of consultation. Changes in both instances were focused on those streets where the public consultation response was concentrated.
- 4.22.** Any proposed extension of the main holiday accommodation areas was founded on the basis that further change to residential use can effectively be resisted. The Council must have confidence that when holiday accommodation properties go on the market, new or relocated businesses can continue to be attracted to move into these areas. The proposed changes to the boundaries are put forward on this basis.
- 4.23.** The focus is not always on the best properties – although this is a key consideration - but it is 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 lends itself towards safeguarding holiday use or a more mixed holiday/ residential future.
- 4.24.** Together the recommendations continue to provide for a concentrated focus on a much more limited number of quite specific streets and terraces of small areas of holiday accommodation. An exception is the larger “*South of Town Centre*” proposed main holiday accommodation area, which is of key importance to Blackpool's resort future. This area will not continue to sustain its existing quantum of holiday accommodation, and there is already significant incidence of properties in residential use. However, there remain many strong terraces of continuous or near unbroken holiday accommodation use, throughout this area, where policy will continue to safeguard holiday use.
- 4.25.** Elsewhere outside these areas, the principle is that change to residential use – subject to it being in accord with the Council's revised standards – will be permitted.

5. Recommendations

Proposed Changes to Holiday Accommodation SPD Planning Policy Boundaries

5.1. The recommended changes to the holiday area boundaries from those shown in the earlier Holiday Accommodation Draft Supplementary Planning Document (May 2010) are set out below.

(1) *To reconfirm the following changes, as approved for consultation by the Council's Executive on November 3rd 2010*

Policy R18: Key Promenade and Hotel Frontages

- No change

i. Policy R18 : Main Holiday Accommodation Promenade Frontage

- the addition of a section of properties fronting Central Promenade from Manchester Square to Trafalgar Road.
- the inclusion of three holiday premises to the south of Dean Street.
- The deletion of a section of the North Promenade between Gynn Square and Warley Road

ii. Policy R19 Main Holiday Accommodation Areas:

The Cliffs Main Holiday Accommodation Area.

- The addition of a section of Gynn Avenue.

North of Town Centre/ Lord Street Main Holiday Accommodation Area.

- The exclusion of a section of Lord Street between Banks Street and Yates Street
- The inclusion of a section of Banks Street west of Dickson Road.

Town Centre (South) Main Holiday Accommodation Area.

- The addition of sections of Palatine Road and Reads Avenue

Foxhall Main Holiday Accommodation Area

- No Change.

South Beach Main Holiday Accommodation Area.

- The addition of Alexandra Road.

Pleasure Beach (North) Main Holiday Accommodation Area.

- The addition of a section of Dean Street west of Bond Street
- The exclusion of the southern side of Station Road west of Bond Street

(2) *To approve the following further changes, following the second round of consultation (November – December 2010).*

Policy R18: Main Holiday Accommodation Promenade Frontage

- The addition of one holiday property to Central Promenade.

Policy R19: Town Centre (South) Main Holiday Accommodation Area.

- The addition of the south side of Havelock Street

Policy R19: Pleasure Beach (North) Main Holiday Accommodation Area.

- The re-instatement of the south side of Osborne Road and Balmoral Road, west of Bond Street.

Policy R19: Pleasure Beach (South) Main Holiday Accommodation Area.

- The removal of property numbers 23 Clifton Drive, 8-10 Burlington Road West.

6. Conclusion

- 6.1** 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.
- 6.2** The objections received tended to focus on the exclusion of key streets and in response a number of changes were proposed by the Council, following which responses received in the second round of consultation were overwhelmingly supportive of the changes proposed.
- 6.3** Inevitably, while not everyone will support the final outcome of the whole process, there remains clear recognition and support for the need to rationalise and improve the holiday accommodation offer in Blackpool. Following public consultation it is also evident that a substantial number of the concerns and objections to the detailed boundaries have now been addressed.

APPENDICES

APPENDIX 1: CONSULTATION

- Appendix 1a: Holiday Accommodation and Core Strategy Exhibitions
- Appendix 1b: Area Forum Meetings
- Appendix 1c: Number of Responses Received
- Appendix 1d: List of all Statutory, Non-statutory and Community Members Consulted
- Appendix 1e: Holiday Accommodation Leaflet
- Appendix 1f: Holiday Accommodation SPD Comments Form
- Appendix 1g: Formal Notice: Blackpool Evening Gazette
- Appendix 1h: Example Consultation Letter, Plan and Comments Form.
- Appendix 1i: Consultation Portal Emails
- Appendix 1j: Example of Public Exhibition Boards

APPENDIX 2: REVIEW OF HOLIDAY AREAS

- Appendix 2: Review of the Holiday Areas Consultation Responses

APPENDIX 3: RESPONSES

- Appendix 3a: Summary of Public Consultation Community Responses
- Appendix 3b: Summary of Public Consultation Statutory and Other Stakeholder Responses
- Appendix 3c: Summary of Questionnaire Responses
- Appendix 3d: Summary of Responses to the Second Round of Consultation
- Appendix 3e: Core Strategy Preferred Option and Holiday Accommodation SPD Public Exhibitions

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	First Round of Consultation		Second Round of Consultation	Total
	Questionnaires	Written Responses	Written Responses	
General	1	11	15	27
Norbreck Bispham and Northshore Cliffs	9	20	26	55
North of the Town Centre	17	5	18	40
South of the Town Centre	28	24	45	97
Central Promenade and Foxhall	19	3	3	25
South Beach	29	6	17	52
Pleasure Beach	13	7	28	48
Total	116	76	152	344

Appendix 1d: List of all Statutory, Non-statutory and Community Members Consulted

- 1.1** The list provided below indicates the statutory and non-statutory consultees contacted as part of the public consultation on the Draft Holiday Accommodation Supplementary Planning Document and subsequent Holiday Accommodation Consultation Report. Other guest house owners / hoteliers / residents / commercial businesses within Blackpool who commented on LDF documents previously or who requested to be updated were also consulted.
- 1.2** In addition to the consultees below, businesses (including hotels, guest houses and holiday flats) and residential properties within the Resort Neighbourhoods (as defined by the Local Plan 2006) were sent a leaflet providing information on the SPD and associated public consultation which took place between May and July 2010.

Specific / Statutory Consultees

Government Office North West Lancashire County Council Fylde Borough Council Wyre Borough Council Preston City Council St Anne's Parish Council Westby with Plumpton's Parish Council Staining Parish Council Lancashire Constabulary Lancashire Police Authority Northwest Regional Development Agency North West Regional Assembly National Grid Land & Development	Deputy Head of Planning the Coal Authority Planning Liaison Officer Environment Agency Regional Planner English Heritage Planning & Advocacy Team Natural England Highways Agency Network Rail Division Manager Department for Transport Blackpool Primary Care Trust North Lancashire Primary Care Trust Strategic Health Authority (North West) DEFRA, Regional Planning Advisor T-Mobile	Vodafone Hutchinson 3G UK Limited (Three) Mobile Operators Association Orange O2 BT Group Plc, Regional Manager North West Mono Consultants Limited Patrick Farfan Associates British Gas Properties Electricity North-West United Utilities
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General / Non-Statutory Consultees

Elected Representatives Blackpool North MP Blackpool South MP European MPs Blackpool Councillors	Senior Management, Blackpool Council Planning Staff, Blackpool Council LSP Members (via Partnership Delivery Officer)	Barnardos Blackpool Project CVS
Council Officers	Voluntary Bodies Council for Voluntary Service	Different Religious Groups Faith Forum Blackpool Congregations of Jehovah's Witnesses

Bodies representing Disabled People

Blackpool, Fylde & Wyre Society for the Blind
Motor Neurone Equalities Forum
Leonard Cheshire North West Region

People carrying on Business

Business Link Lancashire
Federation of Small Businesses
Lancashire Economic Partnership
Blackpool Fylde & Wyre Trades Union Council
North & Western Lancashire Chamber of Commerce
The Mersey Partnership
Blackpool Bids
Town Centre Manager
Dale Street Market Manager
Blackpool Self-Catering Association
StayBlackpool
Lancashire and Blackpool Tourist Board

Youth Groups, Schools, Colleges

Blackpool Young People's Council & Blackpool Voice
Blackpool & Fylde College
Blackpool Sixth Form College
Revoe Community Primary School
Community Futures
Blackpool Friends of Kingscote Park
Blackpool & Fylde Rail Users' Association
Blackpool Youth Service
1st Norbreck Scout Group

Conservation, Preservation & Amenity

Civic Trust Regeneration Unit

CPRE Lancashire Branch
Council for the Protection of Rural England
Lancashire Wildlife Trust
RSPB
National Playing Fields Association
Sustainability North West (SNW)
Theatres Trust
The Woodland Trust
Conservation Officer Lancashire Wildlife Trust
Fylde Bird Club
Blackpool Environmental Action Team (BEAT)
Victorian Society
Blackpool Civic Trust

Transport

Blackpool Transport Services Ltd
Railtrack Property
Confederation of Passenger Transport
Northern Rail
Stagecoach
National Express
Better Transport
Tanzogo

Older Person Groups

Senior Voice Forum

Housing / Design Interest Groups

CABE
Places for People
Living Streets

Local Residents Associations

Foxhall Village Regeneration Association
Revoe Area Forum

Layton Area Forum
Alexandra Road West Community Action Group

Local Businesses / Business Groups

Blackpool Football Club
Job Centre Plus Blackpool South
Blackpool Airport
Evening Gazette
Fylde Coast Economic Development Company
Martin Yates Independent Living Services
Blackpool Pleasure Beach
Leisure Parcs
Progress Recruitment
RealTimeUK North
Beneast Training Ltd
King Street Dental Surgery
In the Pink Leisure
CL Edwards & Sons Ltd
C Cabs
Moorland Motors Ltd
Bestplate Ltd
Chelsom Ltd
Gilberts (Blackpool) Ltd
Advice Link
Bispham Hotel & Traders Association
Blackpool Holiday Trades Association
Blackpool Hotel and Guest House Consortium
BAGS
Hounds Hill Shopping Centre
Jackson Coaches
Pool Leisure
Silcock Leisure
Topaz
Midgley Drawing Service

Coliseum Trade Association
 Reads Avenue Cluster Group
 Read's Grill
 Blackpool Indian Taj
 Cosmo
 Finnegan's Tea Room
 Full Monty
 Kebab Hut
 National Tyres & Autocare
 Salt & Vinegar
 South Shore Market
 St Mary's Pharmacy
 Tattoo Station
 Peggys Panty
 The Pound Shop
 Viking Laundrette
 Woodheads Cafe Limited

Other National / Regional Organisations

Civil Aviation Authority
 General Aviation Awareness Council
 Sport England
 Jobcentre Plus
 Sustrans
 English Partnerships
 Manager GASP UK
 Campaign for Real Ale (CAMRA)
 Lancashire Fire & Rescue Service HQ
 Tesco
 Royal Mail Group Plc
 Department for Constitutional Affairs
 Public Sector Manager Ubiquis
 Relate Lancashire
 Lawn Tennis Association
 Regenda Group
 Equality and Human Rights Commission

Planning Agents

Development Planning Partnership
 How Planning LLP
 Strutt & Parker
 Dev Plan UK
 Carpenter Bidwells Planning
 Paul Butler Associates
 Stewart Ross Associates
 Jones Lang LaSalle
 Nathaniel Lichfield & Partners
 MPSL Planning & Design Ltd
 JWPC Ltd
 GVA Grimley
 Chris Thomas Ltd, Outdoor Advertising
 Consultants
 JMP Consulting
 RPS Planning
 King Sturge LLP
 Halcrow Group Ltd
 Malcolm Judd & Partners
 Higham & Co
 RPS
 DePol Associates Ltd
 Cliff Walsingham & Company
 Cass Associates
 Nathaniel Lichfield and Partners
 Peacock & Smith Consultants
 Mosaic Town Planning
 Indigo Planning
 HOW Planning LLP
 Taylor Young
 Development & Residential Consulting
 Atisreal
 Lambert Smith Hampton
 Steven Abbott Associates
 Keystone Design Associates
 Design Technology Signs

Croft Goode Partnership
 Leith Planning
 PPS Planning
 Turley Associates
 Fusion Online Ltd
 Ampgroup Ltd
 Taylor Young
 David Wilson Homes
 Adams Holmes Associates
 Cassidy and Ashton
 Firth Associates Ltd
 Graham Anthony Consultants
 Home Plan Designs
 Julie Cary Planning
 Planning & Design Services Ltd
 Mackeith Dickinson & Partners
 NTJ Design

House Builders / Construction

Woodford Land
 Morris Homes (North) Limited
 McDermott Developments
 Home Builders Federation
 David McLean Homes Ltd
 Kensington Developments
 Langtree Homes Ltd
 Bellway Homes
 Modus Developments Ltd
 Elite Homes Group Ltd
 Co-operative Group Ltd, Property Division
 ING Real Estate Investment Management
 R.P. Tyson Construction Ltd
 Newfield Construction Ltd
 Enterprise PLC
 Taylor Wimpey UK Ltd
 F Parkinson Ltd
 Galliford Try

Land & Property

Colliers CRE
 Kays Commercial Estate Agents
 Berwin Leighton Paisner (BLP Law)
 Kenrick & Co
 Broomheads
 James Brearley & Sons Ltd
 FPD Savills
 Brunswick Property Co Ltd
 Jones Lang LaSalle
 Countryside Properties
 Allitt Estate Agents
 Dppllp
 Drivers Jonas Deloitte
 Greenbank Partnerships
 Muse
 Kenrick and Co

Surveyors

Alan Jones Chartered Surveyors
 Bentley Higgs

Housing and Landlord Associations

Bay Housing Association
 Windmill Housing Association
 Wyre Housing Association
 Manchester Unity Housing Association
 Blackpool Coastal Housing
 Bostonway Residents & Tenants Association
 Great Places Housing Association
 Fylde Coast Landlords Association
 North West Housing Forum

Holiday Accommodation Providers

Abbey Hotel
 Adelphi Hotel

Aindale Hotel
 Alex Holiday Flats
 Alexandra Holiday Flats
 Alexandra Hotel
 Appleton Lodge
 Arcadian Hotel
 Arendale Hotel
 Argyll Hotel
 Arncliffe Hotel
 Arundel Hotel
 Ascot Hotel
 Ash Lea Hotel
 Ashley Victoria
 Astoria Hotel
 Astorina Hotel
 Athena Hotel
 Athol Hotel
 Avalon Hotel
 Avenue Hotel
 Avoca Guest House
 Avonlea Hotel
 Ayrton House
 Balmoral Guest House
 Balmoral House
 Bank House Hotel
 Barry Holiday Flats
 Beach Holiday Flats
 Beach Mount Hotel
 Beach View Holiday Flats
 Beachside Holiday Flats
 Beckwood Hotel
 Bella Vista Hotel
 Belverdere Hotel
 Berkswell Apartments
 Berkswell Hotel
 Beverley Guest House
 Beverley House Hotel

Bing-Lea
 Blenheim Hotel
 Bond Hotel
 Bonnie Brae Guest House
 Bourne House Hotel
 Bradbury Hotel
 Bramleigh Hotel
 Branston Lodge
 Brecks
 Brene Hotel
 Briardene Hotel
 Bridle Lodge Flats
 Bronte House Hotel
 Brooklyn Guest House
 Brooklyn Hotel
 Broomcroft Hotel
 Burbage Holiday Group
 Burleigh House
 Bute Holiday Flats
 Butlers
 Camelot Hotel
 Camelot House
 Canberra Hotel
 Care Free Hotel
 Castleton Villa
 Cavendish Hotel
 Century Hotel
 Cerena Hotel
 Chadsley Hotel
 Chaseley
 Chaucer House
 Chelston Hotel
 Cherry Blossom Hotel
 Chimes Hotel
 Claremont House Hotel
 Clarron House
 Cleveland Court Holiday Apartments

Cleveland Hotel
 Cliff Haven Hotel
 Coach House Hotel
 Collingwood Hotel
 Colyndene Hotel
 Coniston Hotel
 Coopers Lodge
 Coves Hotel
 Cowley Hotel
 Craig-Y-Don Hotel
 Cranstore Guest House
 Credlands Holiday Flats
 Cressington Hotel
 Cresta Hotel
 Crystal Lodge Holiday Apartments
 Cumberland Hotel
 Dalemoor
 Dalmeny Hotel
 Danescourt Hotel
 Daren Guest House
 Denmar Hotel
 Derwent Hotel
 Devon House Guest House
 Dewsbury House Holiday Flats
 Dickson Hotel
 Dixon Hotel
 Doric House Hotel
 Draytonian Hotel
 Duckies
 Dudley Hotel
 Dunera Hotel
 Dunroun Guest House
 Dutchman Hotel
 Edenfield Guest House
 Ellan Vannin Hotel
 Emmerdale Guest House
 Etherington Flats

Ewdene Hotel
 Fairhaven Hotel
 Falcon Hotel
 Fauld House Guest House
 Ferndale Holiday Flats
 Fiesta Hotel
 Four Seasons
 Gladwyn Holiday Flats
 Glen Stuart Hotel
 Glenburn Guest House
 Glenheath Hotel
 Glenholme Hotel
 Glenmere
 Glenwalden Hotel
 Goldon Palace
 Gr8 Escape Hotel
 Grampion House
 Gramsford Hotel
 Granby Lodge
 Grand Villa Guest House
 Grandville Hotel
 Grasmere Hotel
 Grays Hotel
 Greenbank Holiday Flats
 Gresford Hotel
 Grosvenor Hotel
 Guyz Hotel
 Gynn House Hotel
 Habberly House Hotel
 Haldene Guest House
 Harts Head Hotel
 Hatton Hotel
 Haven Hotel
 Hazeldeve Private Hotel
 Hazelwood Guest House
 Highbury Hotel
 Hilbre Hotel

Hilton Hotel
 Holiday Hotel
 Hollingdales Hotel
 Holmed Hotel
 Holmlea Hotel
 Holm-Lea Hotel
 Holmsdale Hotel
 Holmside House
 Homecliffe Hotel
 Hotel Bianca
 Hotel Libra
 Hotel Maxine
 Hotel Picasso
 Hotel Pierre
 Hotel Rossi
 Hotel Wilmar
 Hurstmere Hotel
 Ivydene Holiday Flats
 Jade Apartments
 Jesmond Hotel
 Katrina Hotel
 Keighley House
 Kenbry Guest House
 Kimberley
 King Edward Hotel
 Kings Court Hotel
 Kingsway House Guest House
 Kirkview Guest House
 Lanayr Hotel
 Langley House Hotel
 Langroyd Hotel
 Lawnswood Holiday Flats
 Lawrence House
 Le Papillon
 Leatham Park Hotel
 Leecliff Hotel
 Lenbrook Hotel

Lexham Hotel
 Lindisfarne
 Lindsey Hotel
 Llanryan Guest House
 Lonsdale Hotel
 Lords & Ladies Hotel
 Lords Guest House
 Lower Flat
 Lynalan Hotel
 Lynbar Hotel
 Lyndale Holiday Flats
 Lyndene Hotel
 Lyndhurst Hotel
 Lynhurst Hotel
 Lynmore Guest House
 Lynwood Guest House
 Mackintosh Hotel
 Madi Gras Hotel
 Manhattan Hotel
 Manor House Hotel
 Manuela Rose
 Maple Timber Frame
 Mardi Gras Hotel
 Mardonia Hotel
 Margarets Private Hotel
 Marinne Hotel
 Marlow Lodge
 Marsland Hotel
 Martells Hotel
 May Dene Hotel
 Mayfair Hotel
 Meland
 Melrose Hotel
 Memphis Hotel
 Merginn Hotel
 Miramar Holiday Flats
 Misterton Guest House

Monteray Guest House
 Morada Hotel
 Moray House Hotel
 Mornington Hotel
 Morrisey Hotel
 Nevele Hotel
 New Ashwood Holiday Apartments
 New Brackens Hotel
 New Hampshire Hotel
 New Oak Lea
 New Phildene Hotel
 New Promenade Hotel
 New Southdown Holiday Flats
 Newburn Hotel
 Northdene Hotel
 Northfield Hotel
 Northmount Hotel
 Norwood Hotel
 Norwyn Court Flats
 Nova Holiday Flats
 Number One Hotel
 Oak House
 Oakleigh Guest House
 Oaklyn Hotel
 Oakville Flats
 Oakwell Hotel
 Ocean View Holiday Flats
 Oregon Guest House
 Orlando Guest House
 Osborne House Hotel
 Park Villa Hotel
 Pembroke Hotel
 Phillips Apartments
 Pierremont Guest House
 Pierview Hotel
 Pilatus Hotel
 Pinelodge Hotel

Polonez Hotel
 Ponderosa Guest House
 Ponto Nova
 Porto Nova Holiday Flats
 Pound City
 Princess Hotel
 Priory Court
 Queen Victoria Hotel
 Red Rose
 Red Rose Holiday Flats
 Renton House
 Rhyl Hotel
 Rigby Hotel
 Rio-Rita Hotel
 Rocklea Hotel
 Ronda Hotel
 Rossall House
 Rossdene House
 Rothwell Hotel
 Royal Beach Hotel
 Royal Park Hotel
 Royal Windsor Hotel
 Rugby`S Hotel
 Sailyn
 San Diego Guest House
 Sancta Maria Holiday Flats
 Sandalwood
 Sandalwood Holiday Flats
 Sandhurst Hotel
 Sandpiper Hotel
 Sandridge
 Sandringham Court Hotel
 Sands Hotel
 Scotts Guest House
 Sea Breeze Guest House
 Seabreeze
 Seaclose Hotel

Seacroft Suites
 Seagulls Nest
 Seaview Hotel
 Seaway Hotel
 Second Floor
 Sharn Bek Hotel
 Shazron Hotel
 Shellard Hotel
 Shepperton Hotel
 Sheron House Bed & Breakfast
 Sherwood Hotel
 Shirley Dene Hotel
 Shores Hotel
 Show Door Apartments
 Silverdale Hotel
 Simons
 Somerset Apartments
 Somerville Hotel
 Southenders Hotel
 Southern Comfort Hotel
 Southlea
 St Davids Holiday Flats
 St Elmo Hotel
 St Ives Hotel
 St Kilda Hotel
 Stag Hotel
 Stage Door Hotel
 Starcliffe Hotel
 Stockton Grange Hotel
 Stones Properties
 Strachan Hotel
 Strathmore Hotel
 Strawberry Fields Hotel
 Sundown Hotel
 Sunnydale
 Sunnyhurst Hotel
 Sunnyside Guest House

Sunnyside Hotel
 Sunset Hotel
 Sussex Hotel
 Sutton Park Hotel
 Sylver Crest Holiday Flats
 Sylvester Rest Home
 Talavera Hotel
 The Address
 The Ambleside
 The Atlantic Hotel
 The Avonlea Hotel
 The Bamford Hotel
 The Beachcomber Hotel
 The Blue Haven Holiday Flats
 The Burleigh
 The Burns Hotel
 The Chimes
 The Claremont House Hotel
 The Cloverleaf Hotel
 The Craigmore
 The Crompton Hotel
 The Delamere
 The Draytonian
 The Dunes
 The Golden Sands
 The Grasmere
 The Gresford Hotel
 The Kimberley
 The Lantern Hotel
 The Laurels
 The Mackintosh Private Hotel
 The Marina
 The Merginn
 The Moores Hotel
 The New Central Hotel
 The Northdene
 The Old Coach House

The Orlando Hotel
 The Pendeen
 The Pendeen Hotel
 The Pilatus
 The Rhyl Guest House
 The Rockdene Hotel
 The Rosedale Hotel
 The Royal Windsor Hotel
 The Rugbys
 The Sandal Wood
 The Seaside Hotel
 The Sherwood
 The South Lea
 The Southern Rebel
 The Sunset Guest House
 The Trades Hotel
 The Tudor
 The Valdene Hotel
 The Victoria Hotel
 The Villa Hotel
 The Westcoe
 The Wilmar Guest House
 The Wilton Hotel
 The Windsor
 The Yealm
 Thorncliffe
 Touchwood Hotel
 Trentham Hotel
 Trianon
 Tudor Hotel
 Tudor House
 Tudor Rose Hotel
 Tuxford Guest House
 Tynan Hotel
 Valdene Hotel
 Vance House
 Verdo House

Victoria Hotel
Vidella Hotel
Villa Mora Hotel
Walcot Hotel
Wallace Hotel
Walverdene Hotel
Waters Edge Hotel
Wavecrest Hotel
Waverley Hotel
Waverley House Apartments

West Vale Hotel
Westcliff Hotel
Westfield Hotel
White Heather Hotel
White House Hotel
White Moon Hotel
White Rose Hotel
Wilmar Guest House
Wilton Hotel
Wingate Hotel

Winston Hotel
Wittom House
Woodland Hotel
Woodleigh Hotel
Worcester House
Wylvern Hotel
Yealm Guest House
Yes Hotels

Appendix 1e: 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 1f: 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 1g: Formal Notice: Blackpool Evening Gazette

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 1h: Example Consultation Letter, Plan and Comments Form



Our Ref: HA Consultation Report
Date: 5th November 2010

Dear Sir or Madam,

Draft Holiday Accommodation Supplementary Planning Document Consultation Report.

You may be aware that Blackpool Council's Draft Holiday Accommodation Supplementary Planning Document (SPD) went out to consultation in the summer. In response to the representations received we have prepared a report setting out further proposed changes to the boundaries of the holiday areas.

Your comments are welcomed on these changes. Please find a plan overleaf of the proposed changes for your area.

Public Consultation starts on Monday 8th November and ends Monday 6th December 2010.

You are being consulted as an interested party who may own or occupy a property within an area where changes are being proposed or because you have commented on the Draft Holiday Accommodation SPD, or have requested to be kept updated regarding progress on the document.

The document and revised plans for your area and other areas across the resort can be viewed on the Council's website at: www.blackpool.gov.uk/holidayaccommodation or at the following locations during normal opening hours:

- Customer First Reception, Municipal Buildings, Corporation Street
- Blackpool Enterprise Centre, Lytham Road

Comments can be made by returning the completed questionnaire by post or by hand to: Planning Department, Blackpool Council, PO Box 17, Corporation Street, Blackpool, FY1 1LZ. You can also email comments to: development.plans@blackpool.gov.uk. All comments should be received by **5pm, Monday 6th December 2010**. Responses should clearly indicate the address and contact details of the person/organisation responding.

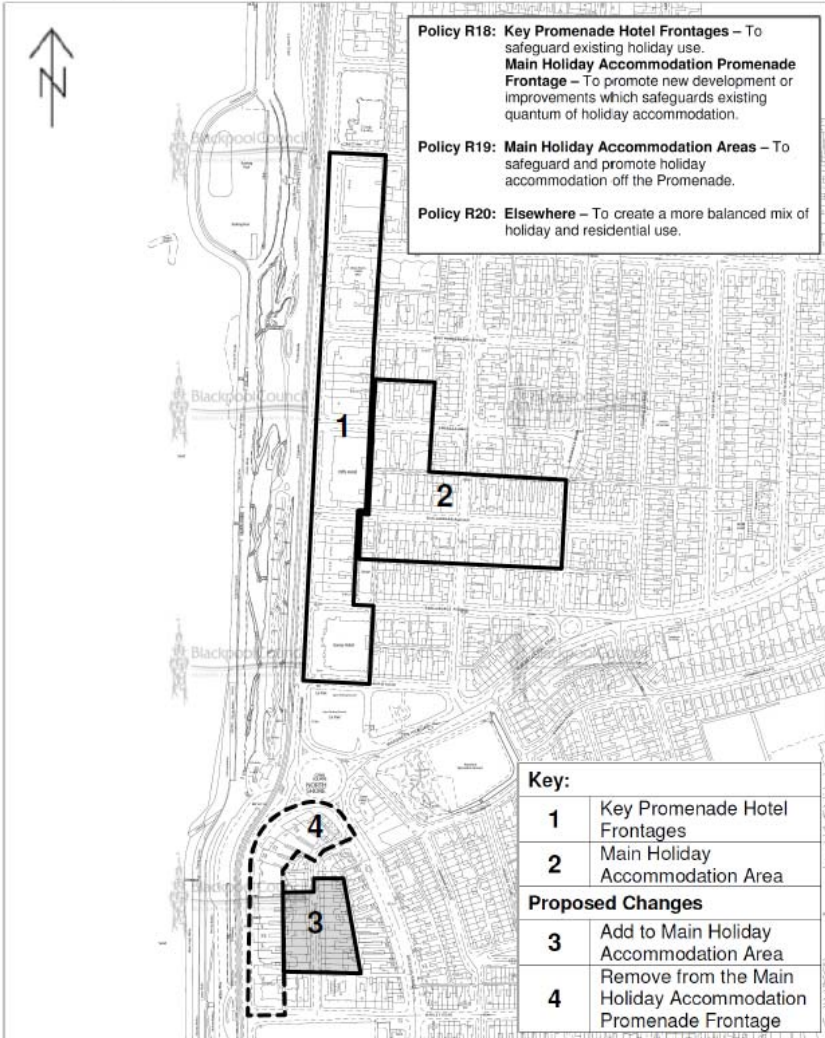
All comments received will be considered and further changes may be made before finalising the Holiday Accommodation document which will then be adopted by the Council as a Supplementary Planning Document and will become a material consideration in assessing future planning applications.

If you would like any further information please contact the Development Plans Team: Tel: 01253 476003 or email: development.plans@blackpool.gov.uk.

Yours faithfully,

G. Page
Graham Page
Core Strategy Manager

North Shore Cliffs – Amended Boundaries
 (No changes proposed for Bispham and Norbreck)



Reproduced from the Ordnance Survey Mapping with the permission of the Controller of Her Majesty's Stationary Office, ©Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Blackpool Borough Council 100019178, 2010.

We want your comments!

Name:.....
 Address:.....
 Email address:.....

Do you support or object to the new proposed boundaries in your area:

- | | Support | Object | No Opinion |
|--|--------------------------|--------------------------|--------------------------|
| a. to add part of Gynn Avenue to the Main Holiday Accommodation Area? (Property numbers: Odd: 1-25. Even: 4-22) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. to remove part of the Promenade (from Gynn Square to Warley Road) from the Main Holiday Accommodation Promenade Frontage? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Any further comments?

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All responses must be received by 5pm Monday 6th December 2010.

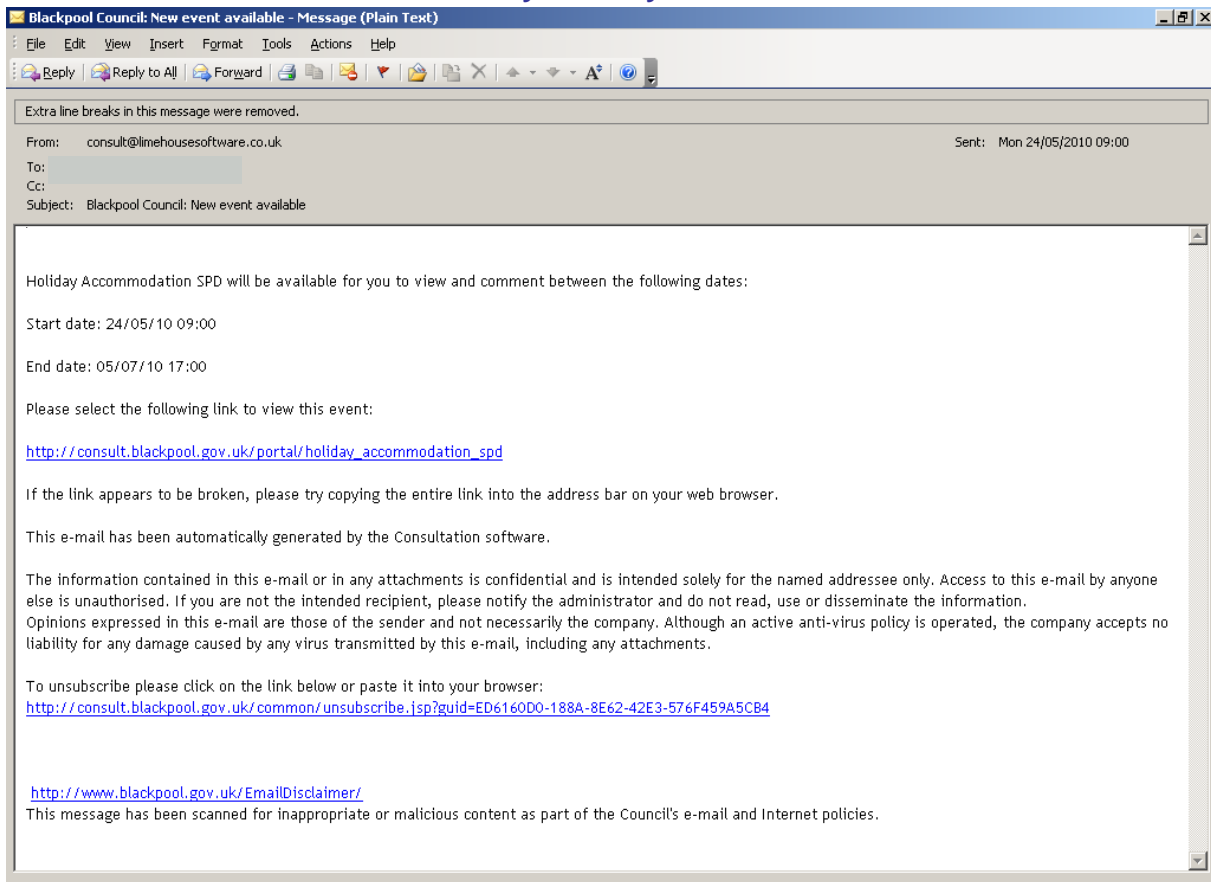
This questionnaire can be sent by post or returned by hand to the address below:
 Planning Department, Blackpool Council, PO Box 17, Municipal Buildings, Corporation Street,
 Blackpool, FY1 1LZ.

Comments can also be emailed to: development.plans@blackpool.gov.uk.

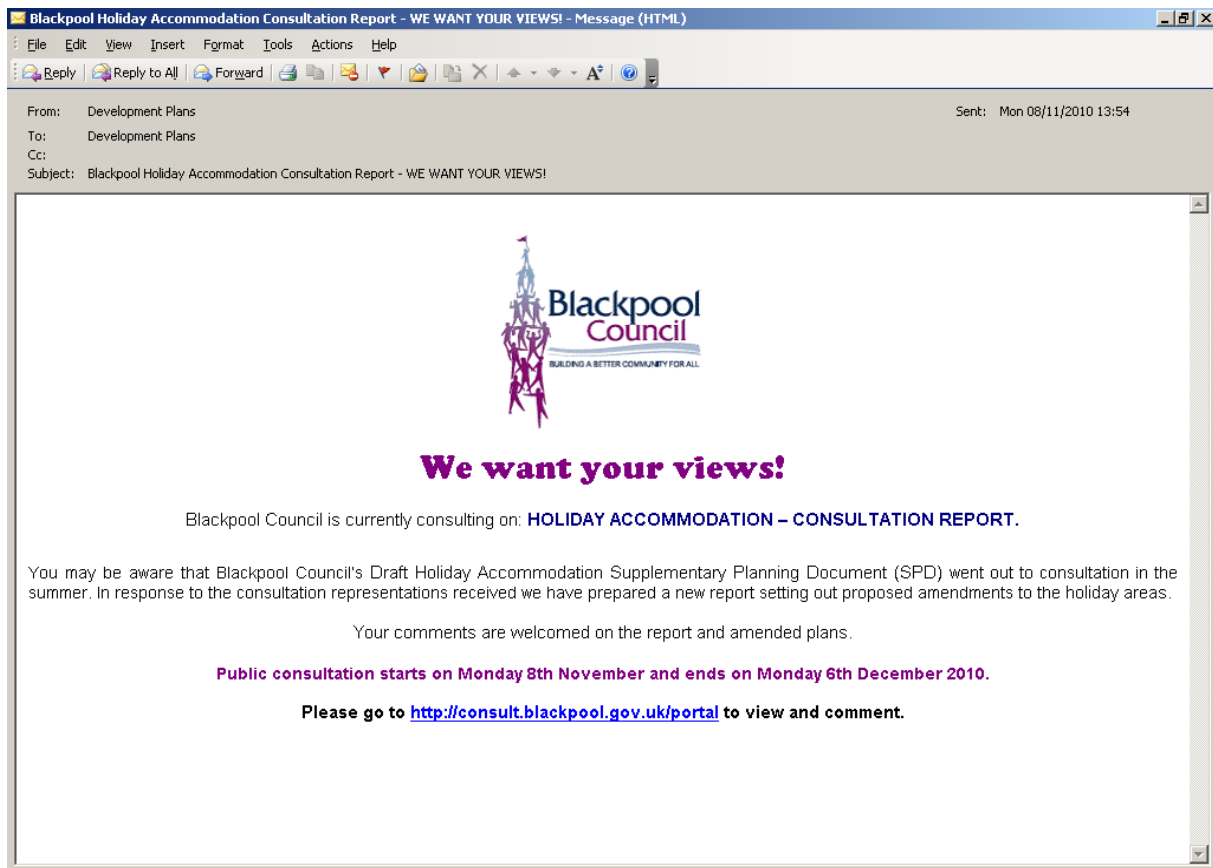
To consult a full version of the Holiday Accommodation SPD and Consultation Report including plan boundaries for all areas across the resort please visit the Council's website or the Council Offices.

Appendix 1i: Consultation Portal Emails

Consultation Notification – Sent Monday 24th May 2010



Consultation Notification – Sent Monday 8th November 2010



Appendix 1j: Example of Public Exhibition Boards

2010-2020

Blackpool Core Strategy

HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

What is proposed?

The Core Strategy Preferred Option proposes to replace the existing widely drawn resort neighbourhoods with smaller more concentrated holiday accommodation areas, and wider mixed use neighbourhoods.

The Holiday Accommodation consultation document applies the Core Strategy policy and identifies the proposed boundaries of the main holiday accommodation areas.



Lord Street



Metropole

The Need for Change

Current Blackpool Local Plan policy seeks to prevent the loss of holiday accommodation in the widely drawn resort neighbourhoods.

The Fylde Coast Visitor Accommodation Study (2009) identified an over-supply of 14,000 bedspaces (approx. 400 holiday accommodation premises) in the resort.

The new Core Strategy seeks to provide a policy framework with the dual focus of safeguarding key holiday accommodation areas and promenade hotel frontages, and creating balanced mixed neighbourhoods.



Source: www.bigbluehotel.com

Key Aims

- Support an improvement in quality and reduction in quantity of holiday accommodation which consolidates provision around the strongest clusters.
- Maintain the Promenade as the 'shop window' to the resort, offering a range of high quality visitor accommodation.
- Provide a focused supporting high quality holiday accommodation offer in six defined off-Promenade areas.
- To encourage mixed neighbourhoods outside of the main holiday accommodation areas. Complementing this will be a New Homes from Old Places guidance setting out Council standards design change of use.



York Street

Reshaping Blackpool's Holiday Accommodation Offer

How the proposed areas were chosen...

The six main holiday accommodation areas were determined in accordance with ten general criteria.

Strategic Evidence	<ul style="list-style-type: none"> • No need to reduce the supply of hotel spaces • The market structure and future for residential areas • Evidence from the Fylde Coast Visitor Accommodation Study
Neighbourhood Evidence	<ul style="list-style-type: none"> • Patterns of accommodation • Detailed Land use and other survey data
Local Character	<ul style="list-style-type: none"> • The location, scale and appearance of properties • Incidence and concentration of holiday accommodation use
The Future	<ul style="list-style-type: none"> • Viability • Market Attractiveness • Possible Alternative Future?



2010-2020

Blackpool Core Strategy

HOLIDAY ACCOMMODATION

DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

The Changing Holiday Accommodation Areas and Wider Neighbourhoods

Core Strategy Policy R18: The Promenade

 Safeguards a number of Blackpool's **Key Promenade Hotel Frontages**, with the largest grouping on the North Shore Cliffs.



Imperial Hotel

 Elsewhere on the **Main Holiday Accommodation Promenade Frontage** it safeguards the quantum of holiday accommodation, but promotes high quality redevelopment and a new mixed use seafront holiday and residential offer.



Norbreck Castle Hotel

Core Strategy Policy R19: Main Holiday Accommodation Areas

 Safeguards and promotes improved high standard accommodation in 6 new main holiday areas off the Promenade.

- The Cliffs
- Lord Street
- Town Centre
- Foxhall
- South Beach
- Pleasure Beach

Core Strategy Policy R20: Mixed Neighbourhoods

Outside the main holiday accommodation areas the focus is on managing change and restoring confidence via the remodelling of these areas to create balanced residential neighbourhoods.



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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 details of the Council Officers' consideration as to the proposed way forward. These comprise general comments about the policy approach – followed by more area specific comments for each of the six proposed main holiday accommodation areas. A full schedule of all the detailed comments received through the public consultation process is set out in Appendix 3.

General Comments

First Round of Public Consultation (May to July 2010)

- 2.2** A number of general responses were received from a variety of stakeholders. 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.

Second Round of Public Consultation (November to December 2010)

- 2.8** Following the second round of consultation a number of general comments were received from organisations and statutory consultees which stated they had no further comments to make regarding the proposed changes to the holiday area boundaries. Some responses from individuals were also received which expressed concerns with the approach and proposed changes.

- 2.9** One response suggested the approach has resulted in fragmented areas of holiday accommodation and that it would be more logical to incorporate, or if necessary remove, whole blocks of properties, and suggests the requirements of individuals cannot decide the overall strategy. However, it is essentially clear from public consultation that there is wide support for retaining identified clusters of holiday accommodation which have strong business and local support.
- 2.10** Concerns good hotels and accommodation will fall outside the main holiday areas no matter where the boundaries are proposed, and that inclusion does not imply that the hotels are of a good standard are fully accepted by the council. However, while the approach safeguards the strongest clusters of holiday accommodation, the Council will continue to support existing businesses wherever located to improve the overall holiday accommodation offer of the resort. The focus of the approach is on future change, not existing businesses.
- 2.11** A response which put forward the need to encourage the development of 21st century hotels within the main holiday accommodation areas, is in line with the approach in Policy R19, which permits new or improved accommodation to enhance the long-term future of the main holiday accommodation areas.
- 2.12** Concerns were raised of the need for policy to ensure that hotels that do not change, do not fall into use as HMOs. This is addressed by the *'New Homes from Old Places'* Supplementary Planning Document which provides new housing design guidance standards for residential conversion and sub-divisions and would apply to hotels changing into residential use.
- 2.13** Other general comments received raised concerns which have already been addressed by the SPD and subsequent Consultation Report and require no additional amendments.

Norbreck, Bispham and North Shore Cliffs

First Round of Public Consultation (May to July 2010)

- 2.14** 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*.
- 2.15** 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.
- 2.16** 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.
- 2.17** 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.
- 2.18** 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.
- 2.19** 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*.
- 2.20** Following the significant support for the inclusion of *Gynn Avenue*, this street was 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.
- 2.21** 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. Therefore, following the first round of consultation *Wilshaw Road* remained outside the Norbreck, Bispham and North Shore Cliffs main holiday accommodation area.
- 2.22** A re-evaluation following the first round of consultation highlighted that the Promenade between *Gynn Square* and *Warley Road* contains a variety of properties in non-holiday accommodation use dispersed throughout this section of the Promenade. In the context of the overriding focus of Promenade policy to safeguard holiday accommodation but to also

provide a new mixed seafront residential offer, it was decided in this specific location that increased opportunity and flexibility for change to residential use would not be detrimental to the character and quieter ambience of this area.

Second Round of Public Consultation (November to December 2010)

- 2.23** The second round of consultation focused on the proposed changes – the inclusion of part of Gynn Avenue in the Main Holiday Accommodation Area and the proposed removal of the Promenade (from Gynn Square to Warley Road).
- 2.24** A total of 26 responses were received which provided substantial support for the inclusion of part of Gynn Avenue to the main holiday accommodation area, with a more mixed responses received regarding the proposal to remove the section of Promenade between Gynn Square and Warley Road.

Gynn Avenue

- 2.25** Responses received from Gynn Avenue were very much supportive of the inclusion of part of the street within the North Shore Cliffs main holiday area, emphasising its long history of holiday accommodation provision and its ambience as a nice, popular area containing a significant number of accredited and well maintained properties which has benefited from a busy season. Comments however were also received which supported owners flexibility to convert to residential use if desired, with declining trade in the area.
- 2.26** One comment was critical of the continued exclusion of a small number of properties from the Gynn Avenue main holiday accommodation area, but the existing incidence of residential use, including recent planning permissions, means the Council's position is that it could not realistically resist changes of use elsewhere on Gynn Avenue. It is also important to note that the council will continue to support accredited properties, or those seeking accreditation, regardless of whether they are in or outside a main holiday accommodation, this will also apply to future funding assistance.
- 2.27** It is therefore proposed that the boundary of the Gynn Avenue main holiday accommodation area remains the same as set out in the Consultation Report (October 2010).

Promenade (between Gynn Square and Warley Road)

- 2.28** A number of responses were received with regards to the proposed removal of part of the Promenade (between Gynn Square and Warley Road) from the Main Holiday Accommodation Promenade Frontage, providing mixed opinion. Support was received with comments suggesting that to renovate and re-market hotels on this section is not viable; that the block already contains a mix of uses including care homes, residential and non-trading hotels; that many are currently for sale; and that there is a market for residential apartments with this providing an ideal location.
- 2.29** However, there was also opposition to the proposal from a number of owners who have invested in hotels to maintain a high standard, and suggested that the customer now demands the type of facilities that only larger promenade properties can provide, and that smaller back streets are more suitable to residential use (including some reference to the inclusion of Gynn Avenue).
- 2.30** It is clear from the responses that there is no consensus regarding the proposed removal of this part of the promenade (between Gynn Square and Warley Road). With the mix of uses on this part of the promenade it is appropriately removed from the main holiday accommodation promenade frontage. The focus of the Council's approach is for a realistic re-appraisal of planning policy to effectively manage future change in the holiday areas,

consistent with meeting the needs of today's visitor for a range of choice of both good quality holiday and residential accommodation across the resort.

2.31 Gynn Avenue on this basis continues to provide a small but strong cluster of traditional terraced guest house accommodation off the Promenade, against a predominance of properties in residential use. The Promenade, between Gynn Avenue and Warley Road, is similarly an exception to the predominant focus of policy on safeguarding holiday accommodation and can positively benefit from the flexibility to promote a wider mixed seafront offer.

King Edward Avenue

2.32 One comment was received which questions why this street is still proposed to be within the main holiday accommodation area in light of alleged change to residential use. It is proposed to retain King Edward Avenue within the main holiday accommodation due to the high concentration of properties in holiday accommodation use combined with high levels of accreditation.

2.33 Recommendations:

- Gynn Avenue: boundary to remain as proposed in the Consultation Report (October 2010).
- Promenade: boundary to remain as proposed in the Consultation report (October 2010).
- King Edward Avenue: boundary to remain as proposed in the draft Holiday Accommodation SPD (May 2010).

North of Town Centre

First Round of Public Consultation (May to July 2010)

- 2.34** *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.
- 2.35** 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 that there is too much holiday accommodation and 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.
- 2.36** 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.
- 2.37** 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 is having a detrimental effect on surrounding businesses, which in some cases have heavily invested in their properties.
- 2.38** 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.
- 2.39** 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.
- 2.40** 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.
- 2.41** 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.

- 2.42** In response to the consultation representations, it was 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.
- 2.43** Following the strong support for the inclusion of Banks Street, west of Dickson Road, it was 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 considered that applications for change of use in Banks Street could be resisted by the Council.
- 2.44** Pleasant Street was recommended not to be included in the North of Town Centre main holiday accommodation area due to the general mixed-use nature surrounding and within this small cluster of holiday accommodation properties on Pleasant Street.

Second Round of Public Consultation (November to December 2010)

- 2.45** The second round of consultation on the North of Town Centre area focused on two key aspects: the proposed inclusion of part of Banks Street (west of Dickson Road) and the proposed removal of part of Lord Street (between Banks Street and Yates Street) from the main holiday accommodation area.
- 2.46** In total 18 responses were received from North of the Town Centre focusing on the two proposed changes, with the majority of responses supporting the proposed inclusion of part of Banks Street to the main holiday accommodation area.

Banks Street

- 2.47** Comments of support described this part of Banks Street having a strong history of providing holiday accommodation since the early 1900s, with the street containing a number of well established and maintained guesthouses in close proximity to the promenade, holiday attractions and the Blackpool North railway station.
- 2.48** While there was strong support for the inclusion of this part of Banks Street, some objections were received from owners wishing to change to residential use with the justification that there is currently enough holiday accommodation. On balance, in contrast to a predominant policy focus in this area on creating more residential neighbourhoods, it is considered that Banks Street's concentration of holiday use, its seafront views, and the strong support of most owners, justify its safeguarding within the main holiday accommodation area.

Lord Street

- 2.49** The proposed removal of part of Lord Street from the main holiday accommodation area (between Banks Street and Yates Street) received a quite mixed response, with some supporting and some objecting to its removal. The proposed change also included a small section of Cocker Street. On balance, the number of residential properties already in this location cannot in the Council's view support safeguarding as holiday use, whilst continuing to support existing accredited properties.

Dickson Road

- 2.50** Responses were received from Dickson Road objecting to its exclusion from the main holiday accommodation area, referring to the number of high quality holiday accommodation providers, some of which are accredited. The commercial and mixed use nature of the road

would mean it would be difficult to continue to safeguard holiday accommodation use due to the variety of uses that are prevalent on Dickson Road. Any accredited property, or those seeking accreditation, will continue to be supported by the Council.

2.51 Recommendations:

- Banks Street: boundary to remain as proposed in the Consultation Report (October 2010).
- Lord Street (between Banks Street and Yates Street): boundary to remain as proposed in the Consultation Report (October 2010).
- Dickson Road: position to remain as proposed in the Draft Holiday Accommodation SPD (May 2010).

South of Town Centre

First Round of Public Consultation (May to July 2010)

- 2.52** 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*.
- 2.53** 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.
- 2.54** 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.
- 2.55** 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.
- 2.56** 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.
- 2.57** 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.
- 2.58** 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.
- 2.59** 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.
- 2.60** 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.

- 2.61** 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.
- 2.62** 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.
- 2.63** 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 was recommended should be extended to include sections of these streets.
- 2.64** 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 was 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.

Second Round of Public Consultation (November to December 2010)

- 2.65** The second round of consultation in the South of the Town Centre focused on the proposed addition of parts of Reads Avenue and Palatine Road to the holiday areas. Consultation on the South of the Town Centre attracted a considerable response, with 45 responses received (accounting for almost one third of all responses). The vast majority of responses received were in support of the proposed changes, however a number of objections were also received which either opposed the concept of adding Reads Avenue and Palatine Road or objected to the precise boundaries.

Reads Avenue

- 2.66** The majority of responses from Reads Avenue were supportive of the proposals to include part of the street in the main holiday accommodation area. Comments of support suggested the street was located in a quieter part of the town but still close to the town centre and visitor attractions, providing good quality and accredited accommodation popular with families and older couples.
- 2.67** Some responses were slightly more cautious suggesting that while the inclusion of Reads Avenue is supported there may be a need to revise the boundaries in the next two to three years due to the current economic climate.
- 2.68** Objections were also received that some properties situated between Livingstone Road and Central Drive are too small to provide holiday accommodation and lack adequate parking.

- 2.69** A number of objections were also received related to the exclusion of properties (numbers 44 - 46, and 74 -78 Reads Avenue).
- 2.70** Due to the substantially more mixed character of these sections of Reads Avenue it remains recommended that these properties are not included in the main holiday accommodation area. As previously stated the Council's intention remains to support accredited properties or those seeking accreditation regardless of whether they are included in a main holiday accommodation area or not.
- 2.71** One comment questioned why properties 3-13 Reads Avenue had not been included in the main holiday accommodation area, but there is a mix of uses within this block, and no responses were received from these properties.

Palatine Road

- 2.72** Responses received in relation to the inclusion of part of Palatine Road were again generally supportive, however, more responses were also received from property owners objecting to being included in the main holiday accommodation area. Supportive comments for inclusion state the street is close to the town centre for clubs, pubs, restaurants, events and shopping. The road is described as a main arterial route used by tourists and is a busy trading street, where investment has gone into properties.
- 2.73** Two types of objection were received – those which disagreed with the exact boundaries proposed, but supported the concept of including Palatine Road; and those which objected to the inclusion of Palatine Road. Responses stated that some hotels are no longer trading with others already converted into residential therefore the road is already a mixed area. A number of responses stated they would like to have the choice and flexibility to change use.
- 2.74** Two responses questioned why the boundaries did not extend to Park Road. However, the top end of Palatine Road, whilst retaining a small number of trading hotels, also contains a number of medium-sized non-trading and vacant hotels, residential properties and student accommodation. The mix of uses means it would be unrealistic for the Council to continue to safeguard holiday accommodation use, particularly as a number of holiday properties are adjoined by on both sides by properties in residential use.

Coronation Street

- 2.75** Two responses were received from Coronation Street objecting to the exclusion of a block of properties from the main holiday accommodation area. The comments acknowledged that the street contains a mix of business, but suggest that most businesses on Coronation Street are tourist related, with any loss of holiday accommodation on the road likely to impact such businesses. The block of hotels are described as trading well, with some accredited properties, located between the Winter Gardens and Hotel and Apartments Social Club, and are currently not suffering from derelict properties. In wider terms, the Council's consistent position taken on streets dominated by a mix of commercial, retail, residential and other uses is that their future safeguarding in holiday use is not a realistic way forward.

Havelock Street

- 2.76** A number of objections were received from Havelock Street, with all responses stating that the street is centrally located with hotels, guest houses and holiday apartments trading in the street for over 30 years and continue to have good trade with hoteliers having no desire to change use. The responses refer to documentation from a recent property purchase (June 2010) which shows the street to be part of a Central Holiday Zone. It is presumed this refers to the Resort Neighbourhoods as set out in the adopted Blackpool Local Plan (2006), which is now under review as part of this current process.

2.77 Having again reviewed the situation, it is considered that on the south side of Havelock Street there is a sufficient cluster and strength of holiday accommodation use to be included in the main holiday accommodation area. The north side of Havelock Street is already largely in mixed/ non-holiday accommodation use, and it would not be justified in policy terms to include these properties.

Leopold Grove

2.78 One response received from Leopold Grove objected to the street not being included within a main holiday accommodation area, suggesting the street is close to the Winter Gardens, town and theatres. It is acknowledged that the street does contain two accredited properties, however there has been no significant response for the inclusion of Leopold Grove as a main holiday accommodation area.

2.79 Recommendations:

- Reads Avenue: boundary to remain as proposed in the Consultation Report (October 2010)
- Palatine Road: boundary to remain as proposed in the Consultation Report (October 2010)
- Coronation Street: position to remain as proposed in the Draft Holiday Accommodation SPD (May 2010)
- Havelock Street: Recommend to include part of the south side of Havelock Street in the main holiday accommodation area.
- Leopold Grove: position to remain as proposed in the Draft Holiday Accommodation SPD (May 2010)

Central Promenade and Foxhall

First Round of Public Consultation (May to July 2010)

- 2.80** 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 was 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.
- 2.81** 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.
- 2.82** 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.
- 2.83** 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.
- 2.84** 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.
- 2.85** A response relating in general to the Foxhall main holiday accommodation area raised a number of concerns, in particular, about how the proposals relate to the Foxhall Neighbourhood Plan. The focus of the proposed definition of the main holiday accommodation areas on York Street and Bairstow Street is based on the assessment based of the same criteria set out in the draft SPD as across all of the resort holiday areas. The safeguarding for holiday use of Bairstow Street and York Street independent of any future wider proposals for the area.
- 2.86** In conclusion, the boundaries proposed in the draft SPD were largely supported in the responses received from the Foxhall area. Whilst a number of responses also contested the proposed Foxhall boundaries, very few, if any, alternative streets or boundaries were suggested and it was recommended the main holiday accommodation area remains the same as initially proposed.
- 2.87** An additional section of main holiday accommodation promenade frontage was also proposed between Manchester Square and Trafalgar Road, this section was initially omitted in light of uncertainty/ flexibility needed in terms of evolving potential proposals for the remodelling of the Foxhall area. With subsequent clarification, this section of the Promenade was included as part of the Main Holiday Accommodation Promenade Frontage.

Second Round of Public Consultation (November to December 2010)

2.88 With no changes proposed to the boundaries, few comments were received. A response from Bairstow Street highlighted that there are a number of properties not in holiday use on the street, however does not object to the street being included in a main holiday accommodation area.

2.89 A comment was received from one prominent hotel on the promenade, with a 3 star accreditation, adjoined by properties in the holiday accommodation area. It is therefore recommended this boundary is clarified to additionally include this property in the main holiday accommodation Promenade frontage.

2.90 Recommendations:

- Bairstow Street: boundary to remain as proposed in the Draft Holiday Accommodation SPD (May 2010).
- Promenade: recommend to include a property on the Promenade (No 225) in the main holiday accommodation promenade frontage.

South Beach

First Round of Public Consultation (May to July 2010)

- 2.91** 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.
- 2.92** 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.
- 2.93** 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.
- 2.94** 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.
- 2.95** 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.
- 2.96** A number of individual responses were also received from *Wellington Road, St Chad's Road, Lytham Road, Moore Street, Kirby Road* and *Amberbanks Grove*.
- 2.97** 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.
- 2.98** In response to the representations received, it was 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.
- 2.99** 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.

Second Round of Public Consultation (November to December 2010)

2.100 Limited changes were proposed for South Beach following from the first round of public consultation, therefore the focus on the second round of consultation was on the proposed inclusion of part of Alexandra Road to the main holiday accommodation area. A total of 18 responses were received in relation to South Beach with the emphasis being on support for the inclusion of part of Alexandra Road.

Alexandra Road

2.101 Numerous responses supported the proposed inclusion of Alexandra Road, describing it as a thriving street with good businesses, containing a number of large and accredited properties predominantly in holiday accommodation use.

Lonsdale Road

2.102 One comment objected to Lonsdale Road not being included in a main holiday accommodation area. However, the first round of consultation indicated that there was mixed response, and it is recommended Lonsdale Road is not included in the main holiday accommodation area.

Crystal Road

2.103 A varied response was received in relation to Crystal Road, with one comment suggesting the area is in need of regeneration and the proposals to remove excess hotels is good providing properties are family homes rather than HMOs. The response also suggests that remaining hotels would benefit from extra custom following the removal of poor quality accommodation.

2.104 Questions were however, also raised why it could not be included in the main holiday accommodation area. In the light of subsequent confirmation of Council proposals for a programme of high quality residential conversions which will substantially uplift the appearance and character of the street, and its already more mixed character, it is recommended it should remain as part of the proposed mixed neighbourhoods.

2.105 Recommendations:

- Alexandra Road: boundary to remain as proposed in the Consultation Report (October 2010)
- Lonsdale Road: position to remain as proposed in the Draft SPD (May 2010)
- Crystal Road: position to remain as proposed in the Draft SPD (May 2010).

Pleasure Beach

First Round of Public Consultation (May to July 2010)

- 2.106** 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.
- 2.107** 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.
- 2.108** Individual responses from eight properties on Osborne, 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.
- 2.109** 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.
- 2.110** 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.
- 2.111** The focus of responses received from the Pleasure Beach area concerned the exclusion of Dean Street and Station, Withnell and Osborne Road east of Bond Street from the proposed main holiday accommodation area.
- 2.112** 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.
- 2.113** 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 east 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 was 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.

- 2.114** 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 was 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.
- 2.115** 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 was proposed to remain in the Pleasure Beach main holiday accommodation area.
- 2.116** 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.

Second Round of Public Consultation (November to December 2010)

Dean Street

- 2.117** Following proposed changes, a main focus of consultation was the proposed inclusion of part of Dean Street and a small section of the promenade.
- 2.118** The response to the inclusion of Dean Street into the main holiday accommodation area was fully supportive with the street described as being in a fantastic location, close to the main attractions, with good trade and well-maintained holiday accommodation. Similarly, overall responses were supportive of the inclusion of three properties to the main holiday accommodation promenade frontage.

North of the Pleasure Beach

- 2.119** The revised boundaries proposed to remove sections where little, if any, holiday accommodation is provided on sections of Station Road (south side), Simpson Street, Bond Street Osborne Road (south side) and Balmoral Road. A number of objections were made regarding the proposed removal of these streets, but these areas only contain very few holiday accommodation properties.
- 2.120** Responses referring to shops and businesses on Bond Street would not be affected by the main holiday accommodation area policy, and would also not be directly affected by the proposals to remove the above properties.
- 2.121** One response was received from Osborne Road (west of Bond Street) objecting to the proposed removal of the southern side of the street from the main holiday accommodation area and referred to the effect on property values, the costs to update fire regulations and whether business rates will be reduced. These wider issues are addressed at Section 4 of the main report.

- 2.122** The response states there are a number of good guest houses located in the area, but also that the area contains some properties in residential use. The main holiday accommodation area boundaries are based on the strongest clusters of holiday accommodation, however it is acknowledged that within these areas there will be some element of residential use.
- 2.123** In addition, a small number of responses were also received east of Bond Street which suggested that there are a number of good holiday accommodation properties outside of the proposed main holiday accommodation area.
- 2.124** It is fully acknowledged that there are many holiday accommodation properties outside of the proposed areas (approximately half of all Blackpool's holiday accommodation). The policy would continue to support and promote existing business in these more mixed use areas.
- 2.125** A number of responses questioned the inclusion of the Blackpool South Travelodge in the main holiday accommodation area, which is shown as such simply reflecting the fact that it is seen as having a long term future in holiday use.
- 2.126** The Blackpool Pleasure Beach Ltd. objected to the removal of the southern side of Osborne Road and Balmoral Road from the main holiday accommodation area, identifying a need for land adjoining the Pleasure Beach to be of a mainly holiday character, with the streets immediately to the north critical to retaining the viability and attractiveness of the area. As a major property owner on these two sections, the Pleasure Beach acknowledges that a number of properties are not in holiday accommodation use, but have medium to long-term aspirations to provide further modern hotel accommodation in this area.
- 2.127** It is considered that the current mix of uses and aspirations of the Pleasure Beach to re-strengthen the holiday character of the streets justifies the reinstatement of the south side of Osborne Road west of Bond Street and Balmoral Road as part of the main holiday accommodation area.

South of the Pleasure Beach

- 2.128** During the first round of consultation no comments were received from properties south of the Pleasure Beach, therefore no changes were proposed for this area. However, following the second round of consultation three responses were received objecting to the proposed boundaries set out in the Draft SPD (May 2010).

Burlington Road West/Clifton Drive

- 2.129** A response received from the Henson Hotel but seeking permission to demolish and replace with a wholly residential development, object to being included in the main holiday accommodation area. The property adjoins the largely residential area to the east, but Burlington Road West is otherwise dominated by properties in holiday accommodation use.
- 2.130** The recent planning application seeking to demolish the hotel and rebuild a residential scheme also reflected significant structural issues with the property. In these terms it is recommended, in line with the approved planning application, that the property is removed from the adjoining holiday accommodation area.

Bourne Crescent

- 2.131** Two responses were received in relation to Bourne Crescent, which object to the inclusion of all the properties within this promenade frontage, and refer to a series of planning applications which have been submitted seeking to comprehensively redevelop Bourne Crescent.

2.132 Four planning applications have been submitted which together would provide a remodelled Bourne Crescent containing a mix of holiday accommodation and residential use. Three have been approved in principle, subject to conditions, with one application yet to be determined, which is for an entirely residential scheme. The consultation responses refer to the decline in tourist business evident in and around Bourne Crescent.

2.133 The Council's proposed policy for the main holiday accommodation promenade frontage, promotes and supports a new or improved offer that contributes to resort regeneration, but also seeks to retain the existing quantum of accommodation. The policy thus fully recognises the need and also reflects the current planning application proposals for a new high quality mixed use seafront holiday accommodation and residential offer.

2.134 Viewed as a complete scheme the proposals would provide almost a full replacement of the quantum holiday accommodation floorspace and fulfil these policy requirements. Consequently these proposals do not conflict but are fully in line with the designation of this section of the promenade as part of the main holiday accommodation promenade frontage.

2.135 Recommendations:

- Dean Street: boundary remain as proposed in the Consultation Report (October 2010).
- Station Road (south side) and Simpson Street) west of Bond Street: boundary remain as proposed in the Consultation Report (October 2010).
- Osborne Road (south side) west of Bond Street: Recommend to be reinstated.
- Balmoral Road: Recommend to be reinstated.
- Bond Street: boundary remain as proposed in the Consultation Report (October 2010).
- Burlington Road West/Clifton Drive: boundary to be amended to remove the Henson Hotel (23 Clifton Drive/8-10 Burlington Road West) from the Pleasure Beach (south) main holiday accommodation area.
- Bourne Crescent: boundary remain as proposed in the Draft SPD (May 2010)

APPENDIX 3

Appendix 3a: Summary of Public Consultation Community Responses

First Round of Public Consultation Responses (May to July 2010)

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
<i>Norbreck, Bispham and North Shore Cliffs (NSC)</i>				
Lyn & Brian Johnson	King George Avenue	25.05.10	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	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. Accommodation on Wilshaw Road is generally of a high standard. In the past change of use to residential has been resisted by the Council. Gynn Square considered to be a showpiece for the Promenade and it should be again.
Gynn Avenue Appeal	Gynn Avenue	28.06.10	NSC	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: <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 has been retained, with many properties dating between 1890 and 1910. • Attract many return visitors, with the quiet location appealing to families and elderly visitors.
Mr & Mrs Norris	Gynn Avenue	28.06.10	NSC	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. 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. 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.
M & P Collinge	Gynn Avenue	28.06.10	NSC	Strongly object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas. Concerns that their livelihood is being taken away and that achieving accreditation has not mattered.
Susan	Gynn	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
Doherty	Avenue			Concerns regarding mixed neighbourhoods, with the perception that they are to be forced to live in such an area. Gynn Avenue was in the holiday area and there was no mention of it ever coming out.
Pat & Ken Maughan	Gynn Avenue	28.06.10	NSC	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.
Mr. & Mrs. Randall	Gynn Avenue	28.06.10	NSC	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. Areas like Gynn Avenue should be promoted and remove areas that are run down from the holiday areas. 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.
Steve Woodhead & Dawn Redfean	Gynn Avenue	28.06.10	NSC	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. 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).
Mr. & Mrs. Whittaker	Gynn Avenue	28.06.10	NSC	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.
Lin & Dave Weatherall	Gynn Avenue	28.06.10	NSC	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. 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.
William Scott	Gynn Avenue	28.06.10	NSC	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. During the past five years Rosdene House has achieved four-star silver accreditation with Visit Britain.
Mark & Diane Horler	Gynn Avenue	28.06.10	NSC	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. 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).
Mr. & Mrs. Houldsworth	Gynn Avenue	28.06.10	NSC	Object to the exclusion of Gynn Avenue from the proposed main holiday accommodation areas. Invested a lot of time and money into the property and have confidence in Gynn Avenue as a holiday area.

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				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. <p>Concerns raised that investment and marketing will only be targeted at the proposed main holiday</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
accommodation areas.				
<i>North of the Town Centre (NTC)</i>				
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 <p>Lord Street, in comparison, has a number of permanent residences or are not trading, with some relying on</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>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	<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>
<i>South of the Town Centre (STC)</i>				
Councillors Ron and Gary Bell	Town Hall, Blackpool	05.07.10	STC	<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>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<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>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				to help gain accreditation.
Mr A Dickens and Mrs R Dickens	Palatine Road	04.05.10	STC	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.,

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<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	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. Concerned how the proposals may affect successful businesses in the area which bring in thousands of pounds each year.
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	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. 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'. 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. 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.
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.

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<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 Houndshell 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>
<i>Central Promenade and Foxhall (CPF)</i>				
Leith Planning Ltd	Tyldesley Road	21.07.10	CPF	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

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>participate in a consultation exercise without clearly understanding the status of documents.</p> <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	CPF	Main concern is the Foxhall area of Blackpool and its redevelopment.
Stuart Hanlon	Rigby Road	29.05.10	CPF	<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>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				Refers to issues of parking, the length of time for promenade to be completed, the need for pavements and 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 .
<i>South Beach (SB)</i>				
Vicki M Gale	Alexandra Road	29.06.10	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	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.

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>
<i>Pleasure Beach (PB)</i>				
Blackpool Pleasure Beach		05.07.10	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 improved accommodation of a high standard.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<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 Surrounding Area Petition		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 owners in the area. This has also created uncertainty in the area.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Against the SPD.				<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>Questions 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>
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>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<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 do not 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>
General				
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 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</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>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>

Second Round of Public Consultation Responses (November to December 2010)

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
<i>Norbreck, Bispham and North Shore Cliffs</i>				
Janet Jones	Gynn Avenue Hotels Association	03.12.10	NSC	Attach a total of 15 comment sheets supporting the inclusion of Gynn Avenue to the Main Holiday Accommodation Area. The Marina (no. 30) has very recently changed hands and it is the wish of the new owner to continue using this property as a business and has no intention of using the change of use as permission was granted earlier this year. Request that the property should be considered within the Main Holiday Accommodation Area, it is the first point of vision from Dickson Road end, is already accredited and of very high quality order externally as well as internally.
Mr & Mrs J. Huntington	Gynn Avenue	17.11.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i> Gynn Avenue has been a holiday accommodation area since the 1950's, if not longer. Trade and local businesses rely on our support, and the finance put into properties should be recognised. Have been in Gynn Avenue for the past 25 years and paid taxes.
Stephen Fellows	Gynn Avenue	26.11.10	NSC	<i>On the fence regarding proposals for Gynn Avenue. Objects to the new proposed boundaries for the promenade.</i> Undecided regarding the proposals for Gynn Avenue. Knows the area well after living on Gynn Avenue for almost ten years. Sold a hotel on the street 6 years ago then had the chance to buy a hotel again which was renovated to a good standard, however it is considered there is not the same amount of trade there used to be a few years ago. Can see both sides of the fence, people should have the choice to change use to residential if this would sell better.
Mr & Mrs Norris	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade.</i>
Mr & Mrs P. Collinge	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i>
S. Doherty	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i> Blackpool is a seaside resort which constitutes to also being accommodation providers.
-	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade.</i> Gynn Avenue is a nice and popular area. Object to removing part of the Promenade Frontage and Warley Road as this is also a nice and popular area.
Mr & Mrs Randall	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade.</i> Suggests Blackpool is on the up and have experienced a busy season. Removing prime property from the promenade will not be in Blackpool's best interest for the holiday trade.
Steve Woodhead & Dawn Redfern	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i>
Mr & Mrs A. Whittaker	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Mr & Mrs Weatherall	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i>
William E. Scott	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade. Area would be best to be kept as a business area rather than mixed.</i>
Mr M. Horler	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade. All Blackpool hotels should be recognised as being part of a holiday area because all are in Blackpool which is a holiday resort.</i>
Delwyn Hinds	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade. Gynn Avenue should remain in the main holiday area. Concerns that if removed from the main holiday accommodation areas the only benefit would be to owners converting to HMOs or permanent flats.</i>
Christine Daly	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Gynn Avenue is one of the highest accredited streets in Blackpool.</i>
Simon & Janet Jones	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue.</i>
Mr Gwyn Bowen-Thomas	Gynn Avenue	03.12.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade.</i>
Marie O'Brien	Gynn Avenue	03.12.10	NSC	<p>Object to not being included in the Main Holiday Accommodation Area. Aware that other properties on Gynn Avenue have been included as part of the Main Holiday Accommodation Area following the first round of consultation, but number. 30 (The Marina Bed & Breakfast) has not been included. Cannot see any reason why the points of appeal put forward by the Gynn Avenue Hotel Association are accepted by the Council for the other properties but not no.30. The only point of difference is the Council has previously granted permission for change of use of The Marina from a guesthouse to a private dwelling. Stresses that this was an application put forward by the previous owners who ran the business on a semi retired basis, but the change of use has not occurred. Currently have no plans to change the use of the property and since taking over have increased turnover through increased web presence and investment in the property.</p> <p>Continually been working towards increasing The Marina from a 3 star to a 4 star accredited guest house. Long term objectives for the property are to carry out some major improvements (with possible grant help) and upgrade to 5 star. Concerned that properties outside the main holiday accommodation area may not be eligible for future grants to assist with such improvements.</p> <p>The Marina is the first bed and breakfast property that people see as they turn into the avenue from Dickson Road and would like to continue to be a part of the Main Holiday Accommodation Area.</p>
Stephen Craggs	King Edward Avenue	09.11.10	NSC	<p>Questions why King Edward Avenue is a protected holiday area when holiday flats have changed use. King Edward Avenue is the most accredited street in the town and we do not want our guests walking past the incidents and other events which have taken place. We were assured by the local councillors that this sort of thing would not be looked at favourably, questions why this is happening?</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Keith Whigham	King Edward Avenue	08.11.10	NSC	<i>Support the new proposed boundaries for Gynn Avenue.</i> Blackpool North Shore offers a different holiday experience to an older clientele as well as families and couples. The accommodation on Gynn Avenue is well maintained with some accredited properties and would give visitors to Blackpool the use of quality accommodation.
Brian Johnson	King George Avenue	09.12.10	NSC	<i>Support the new proposed boundaries for Gynn Avenue and the Promenade.</i>
T. Turner	North Promenade	25.11.10	NSC	<i>Object to the new proposed boundaries for the promenade.</i> Consider the sea front to be the showcase for Blackpool. Concerns that some property owners may not have received the consultation letters, as a number are managed properties or owners or undertaking renovations. Suggests a consultation meeting should be arranged with all owners before any decision is reached. This arrived after the end of the holiday season, and doubts whether many replies will be received.
J. Docherty	North Promenade	26.11.10	NSC	<i>Support the new proposed boundary for Gynn Avenue. Object to the new proposed boundary for the Promenade.</i>
Steve & Sigrid Reed	North Promenade	01.12.10	NSC	<i>Object to the new proposed boundaries for the promenade.</i> The sea front is a major attraction to visitors coming to Blackpool, providing hotels with sea views. Concerns raised regarding the proposal to remove part of the promenade between Gynn Square and Warley Road from the main holiday accommodation promenade frontage. Hotel has catered for holiday guests for many years and large amounts of money have been invested in the hotel to maintain a high standard. Believe that because Gynn Avenue objected to coming out of the holiday area the proposed removal of the promenade has been put forward to accommodate a reduction in numbers.
Dave Hatch	North Promenade	06.12.10	NSC	<i>Support the new proposed boundary for the Promenade.</i> Gynn – Warley Road is seen by groups as too far out of the Town (inc. football groups) families as not enough happening in the hotel, too small for OAPs as not enough facilities, and couples a combination. To renovate and re-market is just not viable and to leave hotels as they are will escalate disrepair and undermine everything the town is trying to do. On this block there are care homes, pub/hotel, residential, many flats, holiday flats, hotels not operating with all but one for sale. Blackpool needs investment, money out of town to regenerate as there is very little money in town. Blackpool is a desirable place to go to but unfortunately most will visit for the day, sometimes without spending. Believe there is a market for residential apartments just on the outskirts of town in the best locations.
A. T. Adams	North Promenade	07.12.10	NSC	In the main, supports the Draft SPD. A reduction in holiday accommodation is long overdue. However, there is only one promenade, but many back streets. If the hotel sector is to flourish we will require more promenade holiday accommodation not less. Customers demand the type of facilities that only larger promenade properties can provide, with sea view rooms in particular high demand. Back street properties on the main are much smaller and much more suitable for residential use. The promenade should be used for holiday and residential use. The block of properties Gynn Sq to Warley Road is in no doubt one of the finest locations on the promenade, but contains an assortment of properties, although mainly in holiday accommodation use. Development should be permitted on its own individual merits. The Council together with the entrepreneurs have a unique opportunity to create a holiday and residential development on this unrivalled stretch of promenade, to create open space, green areas and car parking.

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
<i>North of the Town Centre</i>				
Mr. Praful Patel	Banks Street	26.11.10	NTC	<i>Object to the new proposed boundary for Banks Street. Would like to change the use of a property on Banks Street. Property has not traded for the last 10 years, suggest there is enough holiday accommodation around to justify present business.</i>
Raymond Bradbury-Boatwright	Banks Street	09.11.10	NTC	<i>Support the new proposed boundaries for Banks Street and Lord Street. The area outlined in Banks Street contains well established hotel properties that are clean, presentable and well maintained. The proposal for Lord Street is well thought out, as the included areas are again well established and presentable with the middle of the street rather less well maintained and in part mainly residential. Cocker Street appears not to be included although it is a nice presentable area.</i>
Ray & Mary Gritt	Banks Street	10.11.10	NTC	<i>Support the new proposed boundary for Banks Street.</i>
Stephen & Karen Ramshad	Banks Street	10.11.10	NTC	<i>Support the new proposed boundaries for Banks Street and Lord Street. Banks Street, adjoining the Promenade as it does should be added as its improvement will enhance the visual aspect of the promenade and add to the visitor's experience. Currently, the street does not suffer from any detrimental development, retaining the character/skyline as was intended when built. From the properties in Banks Street accessibility is crucial to retaining visitors and the hotels in Banks Street to be added allows access to the North Shore Area and Pier.</i>
-	Banks Street	11.11.10	NTC	<i>Support the new proposed boundary for Banks Street. Objects to the new proposed boundaries for Lord Street.</i>
Kevin Reaney	Banks Street	16.11.10	NTC	<i>Support the new proposed boundaries for Lord Street. Object to the new proposed boundaries for Banks Street. Having just had plans drawn to convert the property into self-contained flats, believing this was the route Blackpool intended to move towards, questions whether such an application would still be considered?</i>
Mrs B.J. Ainsworth	Banks Street	23.11.10	NTC	<i>Support the new proposed boundary for Banks Street.</i>
John and Gillian Pate	Banks Street	23.11.10	NTC	<i>Support the new proposed boundary for Banks Street. Banks Street should be included due to its close proximity to the seafront and holiday attractions.</i>
Jose Viana and Shane Lawless	Banks Street	24.11.10	NTC	<i>Supports the new proposed boundary for Banks Street. Banks Street should be included in the main holiday accommodation area as it is close to the railway station, several high profile venues and the promenade.</i>
-	Banks Street	24.11.10	NTC	<i>Supports the new proposed boundaries for Banks Street and Lord Street. Banks Street's proximity to all the main attraction makes it desirable, especially the pier.</i>
Malcolm Lobban	Banks Street	24.11.10	NTC	<i>Supports the new proposed boundaries for Banks Street and Lord Street. Thank you for recognising the value and worth of the professionals in this street who take their contribution to the holiday industry seriously and have, in the main part, gained national tourism recognition to prove their worth. Our particular history dates back to boarding house status before 1910.</i>
Alan and Joan Smith	Banks Street	24.11.10	NTC	<i>Supports the new proposed boundary for Banks Street. Fully support inclusion into the holiday accommodation area not only on a historical level but also as a proactive area which upholds the best traditions of holiday provision in Blackpool.</i>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Dr Farser N. Hatfield	Banks Street	24.11.10	NTC	<i>Supports the new proposed boundary for Banks Street.</i> Strongly support the inclusion of Banks Street in the main holiday accommodation area.
Craig Coleman	Cocker Street	24.11.10	NTC	<i>Object to the new proposed boundaries for Lord Street.</i> Cocker Street is a well established holiday area. Have witnessed a big increase in money being spent on properties to maintain the area. We are a multi-award winning guest house with very strong return customer loyalty. It is thought this would result in a down turn in the area and be detrimental to the all of the businesses in the area, many of which have been established for many years.
K Robinson	Dickson Road	10.11.10	NTC	Concerned that Dickson Road has not been included in the holiday area, which contains some high quality holiday accommodation providers who have invested significant amounts of money into their businesses. Were encouraged to become accredited and have achieved 3 star status from Visit England, directly opposite is a 4 star accredited business. Do not agree that these businesses have been excluded from the holiday areas especially when we have took the advice from Blackpool Council and achieved star status, something which a number of premises within the holiday areas have not done.
John Downer	Dickson Road	12.11.10	NTC	<i>Object to the new proposed boundaries for Banks Street and Lord Street.</i> Objects to the exclusion of Dickson Road from the main holiday accommodation area, after substantially investing in one of the largest hotels on Dickson Street. Questions why the central section of Lord Street is not included in the main holiday accommodation area, and why a part of Banks Street has been included.
M&N Thompson	Lord Street	01.12.10	NTC	Objects to the exclusion of part of Lord Street from the main holiday accommodation area. Before purchasing a guest accommodation property in Blackpool the Council's proposals for the "holiday areas" were considered and were informed that Lord Street was, and would remain, within the defined holiday zone and therefore took no part in the consultation. The portion of Lord Street that is proposed to be removed is a pleasant area, made up of varying styles of tourist accommodation, which attracts a variety of clientele. Operate a Visit England 4* establishment and have invested heavily in the modernisation of the property, and request that the central sections of Lord Street are included in the main holiday accommodation area.
Wojciech Plonski	Lord Street	11.11.10	NTC	<i>Support the new proposed boundaries for Lord Street.</i> Support the removal of Lord Street between Banks Street and Yates Street. Raises concerns regarding anti social behaviour at night.
<i>South of the Town Centre</i>				
Mr G Walsh	Coronation Street	16.11.10	STC	Object to the exclusion of Coronation Street from the main holiday accommodation area. Whilst it is recognised that Coronation Street has a mix of businesses it also has many successful accommodation providers. Of which some are members of Visit Britain. It must be acknowledged that Coronation street does not have the same high street attributes as "Whitegate Drive". Many of the existing businesses situated on Coronation street are tourism based, therefore taking Coronation Street out of the holiday accommodation area will affect the future of these businesses. Suggested that when properties on Lytham Road and surrounding area were allowed to become residential, related tourism uses such as gift shops and market stalls closed. Coronation Street is book ended by the Winter Gardens and the Hotel and Apartments club, the street has mixed usage but so does other streets in Blackpool e.g. Charnley Road.
M Cunliffe	Coronation Street	18.11.10	STC	Objects to the exclusion of Coronation Street from the main holiday accommodation area. Questions why Coronation Street has not been included because of the mix of uses when other streets have been included

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				<p>which are contain a mix of uses, such as Charnley Road. The hotels and guest houses are situated on Coronation Street support small businesses on the high street, which are generally reliant on the tourism trade. Concerns that if hotels and guest house on Coronation Street were to close this may cause retail businesses to close. Concerned that being excluded from the main holiday accommodation area may affect the support provided by the council for accredited properties, and may also impact the sale of properties outside the areas.</p> <p>The community of hoteliers on Coronation Street were able raise money in conjunction with Blackpool Council to install street illuminations and banners to give visitors a feeling of being on holiday. Other high streets cannot offer this look and feel to a specific area. Suggests all of the businesses from 81 – 87 are trading well, and are not suffering from boarded up hotels and derelict shops. Questions the suitability of converting guest houses and hotels in to residential properties. Suggests the boundary should be altered to include a block of holiday accommodation on the western side of Coronation Street.</p>
Mr Norman Prue	Havelock Street	22.11.10	STC	<p>Not enough thought has gone into the effect that leaving Havelock Street out of the holiday area will have on the hotels in that streets. Have worked hard for 30 years to get the hotel and the clientele the way we want it, making all rooms en-suite and decorated to a high standard with no grants. Havelock Street should be in the holiday area.</p>
Steve & Jill Shaw	Havelock Street	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and streets already included and directly at the end of the new Gateway to Blackpool. It was considered important to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less then 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>
Norman & Anne Prue	Havelock Street	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and streets already included and directly at the end of the new Gateway to Blackpool. It was considered important</p>

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				<p>to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less than 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>
Darren & Carol Tyler	Havelock Street	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and streets already included and directly at the end of the new Gateway to Blackpool. It was considered important to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less than 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>
Alan Golding	Havelock	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and</p>

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and Donna Cawthorne	Street			<p>streets already included and directly at the end of the new Gateway to Blackpool. It was considered important to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less than 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>
Ron & Sharon Gill	Havelock Street	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and streets already included and directly at the end of the new Gateway to Blackpool. It was considered important to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less than 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>

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Jay & Sue Holden	Havelock Street	30.11.10	STC	<p><i>Object to the exclusion of Havelock Street.</i> Havelock Street is centrally located and surrounded by roads and streets already included and directly at the end of the new Gateway to Blackpool. It was considered important to create this Central Gateway, which is now directly linked to the new Central Coach Park which is less than 100 yards from Havelock Street. Concerns raised about the potential for HMOs and permanent apartments on Havelock Street, suggesting this will be the first thing visitors and holidaymakers will see from the car park.</p> <p>Hotels, guesthouses and holiday flats have been established here for well over 30 years and have strong trade connections. The holiday properties on this street are fully booked every week from May to September every season with the family and Senior Citizen trade, creating a massive boost for many other trades in Blackpool. Suggested this also provides trade for coach companies bringing visitors to the hotels, and taking visitors on trips within Blackpool. Suggested the hotels of Havelock Street, by working with Rotary Clubs, have a substantial annual turnover.</p> <p>It is considered that properties in Havelock Street which are no longer in holiday accommodation use have done so without any thought for the well established businesses. Request that Havelock Street be included in the main holiday accommodation area and that all available legislation is brought to bear on HMOs in the street. It is considered that by being included in the main holiday accommodation area, hoteliers in the street will receive the credit deserved for creating an extensive business plan. Questions why new purchasers in the street have legal documentation showing them to be part of the Central Holiday Zone dated as recently as June 2010, which is some time after the consultation started.</p>
Mr & Mrs O'Donnell	Leopold Grove	15.11.10	STC	<p><i>Object to being regarded as out of the holiday area.</i> Guests cannot believe we may not belong in the holiday area, especially being so close to the Winter Gardens, town, theatres. Have built trade up over our 22 years in Blackpool, ploughed our money back into the business, spent on upgrading to new fire regulations, and health and safety. Gaining visit Britain stars. Questions why if there are too many bed spaces are the Council allowing other hotels to be built. Suggests the report [Fylde Coast Visitor Accommodation Study] must be out of date as many have lost bed spaces to upgrade to en-suites. Concerned about potential losses when coming to sell. Property is too large for 2 persons and cannot borrow to convert to flats. Requests Leopold Grove to be kept in the holiday area.</p>
Barbara Mary Ogg	Palatine Road	11.11.10	STC	<p><i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Questions what the criteria were for deciding the main holiday accommodation areas. For years Reads Avenue and Palatine Road have been well known by visitors coming to Blackpool for accommodation, as the best area for access to the town centre for clubs, pubs, restaurants, events, shopping centre etc. Not everyone wants to be north of Blackpool which is quiet or south which is mainly the Pleasure Beach and water park. Visitors want to be able to walk to amenities. Palatine Road is off the main roads going to and from Blackpool, it is also a wide road and the properties mainly are large enough to be maintained by the owners who live on the premises. Therefore it is in their best interest to look after their property and to make them hospitable and comfortable to all visitors coming to stay in Blackpool.</p>
Pete Langstone	Palatine Road	06.11.10	STC	<p><i>Object to the new proposed boundaries for Palatine Road.</i> Strongly object to the proposed boundaries. Questions why a number of properties on Palatine Road have not been included in the main holiday</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				accommodation area. Properties have adhered to Council and legal requirements and have invested in the past to improve and upgrade to attract visitors who come back year after year. Questions why the main holiday accommodation area could not continue to the intersection with Park Road. There are hotels in certain parts of the proposed holiday area that are that poorly maintained, and it seems that they will be allowed to remain trading in the holiday area, when other hotels will be left outside.
Mr and Mrs C Wood	Palatine Road	09.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> The proposed changes are very welcome as outlined on the amended boundaries. Question why number 44 and 46 Reads Avenue are not included as holiday accommodation. Aware of the planning application for no. 44 and have objected strongly to these proposals. No reason why these should be excluded or turned into a HMO. Request that the application be refused.
May & David Jennings	Palatine Road	10.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Invested a lot of money in the last few years improving our apartments and building up a good business and cannot see how after all these years Palatine Road was proposed to be taken out of the holiday area.
-	Palatine Road	10.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road</i>
Lorraine and Stewart Lambert	Palatine Road	11.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Pleased that Palatine Road and Reads Avenue are staying in the holiday area. The residents and proprietors of hotels on both roads have very acute cluster groups working in conjunction with local Police Officers and Councillors, but also need the help of the local council. Hoteliers on both roads have spent thousands of pounds on their properties with the help of 'Invest in Blackpool'.
Paul Evans	Palatine Road	11.11.10	STC	<i>Support the new proposed boundaries for Palatine Road.</i> Support plans to include most of Palatine Road in the holiday area. It is a long established holiday road known by many holiday makers and it reflects improvement and the investment made by owners and offers a quality service.
Mr Hugh S. Watt & Mrs Jean S. Watt	Palatine Road	12.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Reads Avenue and Palatine Road form part of one of the main arterial routes used by tourists coming into the centre of Blackpool from the M55 and for this reason these two roads should be included in the holiday area. Palatine Road is a busy thorough fare as it is the only two way road from Park Road going towards the Promenade.
Mr & Mrs Todd	Palatine Road	12.11.10	STC	<i>Object to the new proposed boundaries for Palatine Road.</i> Concerned that hotel property has not been included in the main holiday accommodation area. Following substantial investment the hotel is 4 star accredited. Questions why some holiday accommodation properties on Palatine Road towards Park Road have not been included in the main holiday accommodation area when other hotels which are run down or closed have been included.
Mrs P. O'Dea	Palatine Road	15.11.10	STC	<i>Support the new proposed boundaries for Palatine Road.</i> Pleased Palatine Road will remain in the holiday area. Spent thousands of pounds on up-grading. A very busy road, 5 minutes from town and Promenade and popular with guests, and very pleasant, it must always stay a holiday area.
Christopher Arnold	Palatine Road	16.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Strongly support both Reads Avenue and Palatine Road stay in the holiday area.
Mr & Mrs Spriggs	Palatine Road	16.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Good trade in Palatine Road, guests comment it is a lovely street. Receive a lot of return trade from delegates who attend various

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				conferences at the Winter Gardens as we are right in the heart of the town centre.
Mr R Panek	Palatine Road	17.11.10	STC	<i>Object to the new proposed boundaries for Reads Avenue and Palatine Road.</i> Due to some hotels on Palatine Road no longer trading and some have gone residential, it is quite a mixed area. Palatine Road has flats, residential home and student accommodation. If Palatine Road is to stay in a holiday area then all of the properties should be for holiday use, not mixed. People should be able to have the choice to use their property as a house or hotel. If Palatine Road stays in the holiday area, people who have property on this road are not allowed that choice. Visitors to Blackpool do not know if they are in a holiday area or not.
David and Jill Curtis	Palatine Road	17.11.10	STC	<i>Supports the new proposed boundaries for Reads Avenue and Palatine Road.</i> Pleased that views have been taken into consideration, support Palatine Road and Reads Avenue being in the holiday area.
D Boyes	Palatine Road	23.11.10	STC	<i>Object to the new proposed boundaries for Palatine Road.</i> States that the street is already mixed use, suggests either the whole street should hotels, if not the street should be classed as a mixed neighbourhood. Concerns raised that no action has been taken when properties have changed use, which has therefore resulted in a mixed neighbourhood.
D. McDonald	Palatine Road	23.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Have run hotel for over 20 years, still getting many regular visitors who say Palatine Road is convenient to all amenities and promenade.
Ian Johnson	Palatine Road	30.11.10	STC	<i>Objects to the new proposed boundaries for Palatine Road.</i> Object to being included in the main holiday accommodation area, would like the option to convert to a private house, suggesting very few hotels are being purchased and trade has declined on Palatine Road, there are also a number of hotels that have closed down.
Mr & Mrs I.C. Collins	Palatine Road	02.12.10	STC	<i>Support the new proposed boundaries for Palatine Road.</i> Wish to have the choice to change use of our guest house. One option is to de-register and to return the house back to a luxury family house. Have been here for 8 years and it is just not a viable business – there are just far too many hotels in Blackpool. Pleased to see that we are not included in the main holiday accommodation area, and wish to remain out of it, so that we have flexibility in use for the future.
Stella M. McKenna	Reads Avenue	11.11.10	STC	<i>Object to the new proposed boundaries for Reads Avenue.</i> Property is a private house and has been for approximately 7 years. The properties in proximity to my house are very small with small bedrooms, no living accommodation and no adequate parking facilities, not suitable for holiday accommodation.
Mr C Martin	Reads Avenue	08.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Support the new proposed boundaries to add parts of Reads Avenue & Palatine Road to the Main Holiday Accommodation Area because it is in a quieter part of town and still close to the town centre, Tower etc and suits many visitors coming to the resort. It would protect the area from any further HMOs and if successful would boost confidence in the area.
-	Reads Avenue	09.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Many businesses have spent many thousands of pounds to enhance their property and I am sure the new proposals will be pleasing to businesses.
-	Reads Avenue	09.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Happy to be included in these sections of Reads and Palatine. We have invested, upgraded and striven successfully to achieve national accreditation.
Alan Johnston &	Reads Avenue	09.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> As a new business feel it would be advantageous to be added to the main holiday accommodation area.

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Colin Christie				
Cyril Turner	Reads Avenue	10.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue.</i> Notes that property numbers 74 – 76 – 78 are not included in the main holiday accommodation area. Number 78 is 4 star accredited.
Giancarla Gelsomino	Reads Avenue	10.11.10	STC	<i>Object to the new proposed boundaries for Reads Avenue.</i> Concerned that three holiday accommodation properties on Reads Avenue are not included within the main holiday accommodation area. Questions why the properties have not been included when the hotels pay business rates.
Kalpana & Joesph Robinson	Reads Avenue	11.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue.</i> Recently purchased and refurbished a holiday accommodation property on Reads Avenue, were concerned when the street was initially not included within the main holiday accommodation area. However pleased that the council will continue to support properties that wish to continue to operate as B&B's/Guest Accommodation and have Visit England Accreditation.
Mr K Shone	Reads Avenue	11.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Questions why no. 44 and 46 Reads Avenue have not been included in the main holiday accommodation area.
Mr Peter Allen & Mrs Susan Large	Reads Avenue	15.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Pleased that the holiday area has been revised and that we are now included into this area.
Ray Harley	Reads Avenue	15.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Reads Avenue and Palatine Road are good trading areas. Questions why properties from Reads Grill café down has been excluded.
Stephen Du-Buisson	Reads Avenue	19.11.10	STC	<i>Supports the new proposed boundaries for Reads Avenue and Palatine Road.</i>
Keith and Mandy Cartledge	Reads Avenue	25.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Support the inclusion of Reads Avenue in the holiday area for the foreseeable future, however the way the current climate is looking there may be need to review this in the next 2 or 3 years as the country as a whole is struggling let alone Blackpool. It is unfair to expect holiday accommodation providers to struggle if there is no business or cannot sell because of the same reason. There should be some compromise to enable owners to convert to residential use if needed. Concerned about the effect of Travelodges on smaller hotels and apartments.
Mr & Mrs Allott	Reads Avenue	02.12.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Reads Avenue and Palatine Road are extremely popular with families and older people who visit this area on a regular basis. Families, couples and older visitors stay on these roads as they are in a good location for all the amenities and do not want to stay in areas where there are lots of stag and hen parties. Hoteliers have worked tirelessly putting time and money into their businesses to attain good quality accredited accommodation.
Mr B. & Mrs S. Andrews	Reads Avenue	06.12.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i> Feel that this decision is the right one. Chose Reads Avenue for its location and quality of establishments, i.e. majority accredited etc. Now feel we can proceed with plans for the future on offering guests a great place to stay in Blackpool.
Hazel Turner	Reads Avenue Cluster Group	22.11.10	STC	Writing on behalf of Reads Avenue Cluster Group regarding the exclusion of three properties in Reads Avenue, numbers 74, 76 and 78. These properties are back to back with properties in Palatine Road which have been included so it seems inappropriate that these properties which are trading as holiday accommodation should be left out of the boundary as set out in the Draft Holiday Accommodation Supplementary Planning Document Consultation Report. The owners of the Reads Avenue properties are very distressed that they appear to have been denied the benefit of inclusion.

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Cllr Ron Bell JP	Town Hall	30.11.10	STC	<i>Support the new proposed boundaries for Reads Avenue and Palatine Road.</i>
<i>Central Promenade and Foxhall</i>				
	Bairstow Street	17.11.10	CPF	Concerns about Bairstow Street being holiday accommodation because many properties in this street are not being used as holiday accommodation with some not trading for a number of years. Questions what the council will do about properties changing use.
D & L M Wilmot	Promenade	19.11.10	CPF	Object to the proposed boundary for Central Promenade. Concerned that the property is not included in the main holiday accommodation promenade frontage. The property is a prominent hotel on the promenade and have invested time and money in to the property which is 3 star accredited. Questions why other properties in the same block are included even though the properties are not accredited.
R L Ferrar	Tyldesley Road	08.11.10	CPF	No comments to make
<i>South Beach</i>				
S.C.Bartlett	Alexandra Road	02.12.10	SB	Support to inclusion of Alexandra Road in the main holiday accommodation area. Contains larger properties with much to offer.
Mr & Mrs J Borsberry	Alexandra Road	02.12.10	SB	Have been in the street for 11 years and invested a substantial amount of time effort and costs into the guest house and have worked towards 3 star accommodation. Concerned that if outside the main holiday accommodation areas properties would remain unsold for a long time. Requests that consideration be given to restoring the tram stop at the end of the road.
Jamie Fennell & Michelle Gough	Alexandra Road	09.11.10	SB	<i>Support the new proposed boundary for Alexandra Road</i>
Vicki Gale	Alexandra Road	10.11.10	SB	<i>Support the new proposed boundaries for Alexandra Road and the Promenade.</i>
Mr & Mrs R.S & P.M. Lucas	Alexandra Road	10.11.10	SB	<i>Support the new proposed boundary for Alexandra Road.</i>
Mr & Mrs S. Hunt	Alexandra Road	15.11.10	SB	<i>Support the new proposed boundaries for Alexandra Road.</i> It is thought that removing Alexandra Road would be detrimental to businesses and livelihoods. It is a thriving street with good business and we have been here 10 years. Concerned that if not included in the main holiday accommodation area properties would not sell. Requests that consideration be given to restoring the tram stop at the end of the road. Supports change and suggest Alexandra Road could be a well-presented flagship for new 21 st century changes.
P. Rushton	Alexandra Road	15.11.10	SB	<i>Support the new proposed boundaries for Alexandra Road, Nelson Road and the Promenade.</i> Have lived in this property for 24 years and have a thriving business. Suggests that the South Shore area seems to be being forgotten in the regeneration program.
Mr Barry Alcock	Alexandra Road	16.11.10	SB	<i>Support the new proposed boundaries for Alexandra Road and the Promenade.</i> Alexandra Road is right next to the promenade and one of the few roads with a majority of accredited hotels who take pride in the running of businesses.

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Mrs Mimi Henson	Alexandra Road	17.11.10	SB	<p><i>Support the new proposed boundary for Alexandra Road. Fully support the proposal to keep Alexandra Road in the holiday area with it being one of the best streets in the South Shore Area. It is a good sized street offering parking on one side of the road. All the hoteliers on the street keep good tidy and clean properties. It is considered that to take away the title of holiday area would only open up the risk of properties being sold on for different uses, causing a detrimental effect on the area. It is considered that to lose the holiday status would cause us to lose out on guests and more potential visitors, threatening our livelihoods.</i></p> <p>Concerns raised regarding potential problems which may be generated by hotels converting in to residential use. Concerned that this may negatively affect the whole area and may lead to a reduction in property values. Also suggests that Estate Agents will not advise clients to purchase holiday accommodation that is not within the main holiday accommodation areas.</p>
Kim Wood	Alexandra Road	26.11.10	SB	<p><i>Support the new proposed boundaries for Alexandra Road, Nelson Road and the Promenade. Agree with amended proposals.</i></p>
Mr & Mrs Hill	Alexandra Road	06.12.10	SB	<p><i>Support the new proposed boundary for the Alexandra Road.</i></p>
D.Askham	Crystal Road	08.11.10	SB	<p><i>Object to the new proposed boundaries for Alexandra Road, Nelson Road and the Promenade. Suggest that the whole of Blackpool should be designated as a holiday destination, but allow any holiday accommodation properties to be converted in to residential use wherever the property is situated. This would enable holiday properties that are currently unable to survive financially both inside and outside the holiday areas to be marketable and would improve the area considerably.</i></p>
Gerald Clark	Crystal Road	22.11.10	SB	<p>Fully supports the proposals for South Beach. It is considered the area is badly in need of regeneration, and the proposal to remove excess hotels is a good idea providing the proposal to reinstate premises as family housing and not HMOs is carried through. The poor quality hotels only devalue any attempts to improve the area, the sooner these are removed the remaining hotels should benefit from extra custom and then reinvest in their own premises. Concerns raised regarding the quality of the roads, also suggesting the area suffers from inadequate parking for hotel use.</p>
Mr D. & Mrs L. Askham	Crystal Road	10.11.10	SB	<p><i>Object to the new proposed boundaries for Alexandra Road, Nelson Road and the Promenade. Suggest that all designated holiday areas should be removed as it is too inflexible. Suggests that St Chad's Road and Alexandra Road cannot be included and Crystal Road excluded because the Council has purchased a number of properties on the road. Suggests the whole of Blackpool should be designated as a holiday destination but allow any holiday accommodation to revert to private dwellings.</i></p>
Mr & Mrs Spiers	Lonsdale Road	01.12.10	SB	<p><i>Supports the new proposed boundary for Nelson Road. Objects to the new proposed boundaries for Alexandra Road and the Promenade. Objects to Lonsdale Road not being included in the main holiday accommodation area. Following continued expenditure and improvements the property is the only accredited business in Lonsdale Road. Lonsdale Road is close to the car park, coach park and football ground and it is a main passage to the seafront. Concerned that a mix of uses on the street will not work and may deter guests from staying in the street.</i></p>
John Hogan	St Chads Road	22.11.10	SB	<p>Suggests Crystal Road and other good trading areas should stay in the holiday area, mixing residential within holiday zones does not work.</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Lorna Hughes-Dennis	St Chads Road	22.11.10	SB	Suggests Crystal Road and other busy hotel streets should stay in the holiday area. There should be clear boundaries not mixed areas, as residents do not appreciate hotel guests and vice versa. All the promenade should be located as part of the holiday area and none put aside for residential use, except for south of the Pleasure Beach and north of Gynn Square.
<i>Pleasure Beach</i>				
Peter Marshall	-	08.12.10	PB	Object to the inclusion of Bourne Crescent within the main holiday accommodation promenade frontage, referring to outline planning applications submitted to Blackpool Council for a site that includes the Colwyn, Skye, Trafford, Sandpiper and Headlands hotels.
A. J. Armstrong	Bond Street	10.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street. Suggests Bond Street would benefit from a B&M store.</i>
Mr G. Field	Bond Street	10.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street. Suggests it would be better for Blackpool to encourage businesses to survive in what is already a deprived run down area, stating that there are 26 closed down shops on Bond Street.</i>
K.Jennings	Dean Street	09.11.10	PB	Supportive of the decision to include Dean Street in the holiday areas. Suggests the street is fantastically located and the promenade end is a nice street and has a far better quality of accommodation than many other streets left in the plans.
Mrs Gale Woodcock	Dean Street	08.11.10	PB	Supportive of the inclusion of Dean Street in the main holiday accommodation area.
Mr & Mrs Alan Yarnell	Dean Street	09.11.10	PB	<i>Support the new proposed boundaries for Dean Street, Balmoral Road, and Bond Street. Supportive of the inclusion of Dean Street in the main holiday accommodation area.</i>
Mr & Mrs Colbeck	Dean Street	09.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Questions how will the council ensure that the properties removed from the main holiday accommodation do not fall into disrepair.</i>
Tiam Seng Ng & Ineka Setiawan-Ng	Dean Street	09.11.10	PB	<i>Support the new proposed boundaries for Dean Street, Station Road and the Promenade. Suggests that properties on Dean Street and the Promenade are well located to main attractions and most properties are in a well-maintained condition. The south side of Station Road contains no big or well maintained guest houses. Suggests that most properties on Osborne Road, Balmoral Road and Bond Street are in a bad state and need improvements.</i>
Angela and Allan McClelland	Dean Street	09.11.10	PB	<i>Support the new proposed boundaries for Dean Street, Station Road, Osborne Road, Balmoral Road, Bond Street and the Promenade. Suggests the quality of properties in the streets proposed to be taken out of the holiday are generally poor and anti-social behaviour is rife, and are not inviting streets for holiday makers, properties beyond Bond Street should definitely not be included in the holiday area. Suggests Dean Street deserves to be in the holiday area as trade remains good, and the good proximity to family attractions – Sandcastle, Pier, arcades, Pleasure Beach etc. It is good holiday street and people feel both safe and welcome.</i>
Andrea & Stephen Witter	Dean Street	10.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade.</i>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
Simon Brough	Dean Street	12.11.10	PB	<i>Support the new proposed boundaries for Dean Street, Station Road, Osborne Road, Balmoral Road Bond Street and the Promenade.</i>
Kirsty Jennings	Dean Street	12.11.10	PB	<i>Support the new proposed boundaries for Dean Street and Osborne Road. Object to the new proposed boundary for the Promenade. Questions why Dean Street was not initially included in the main holiday accommodation.</i>
Mr A. Abegg	Dean Street	16.11.10	PB	<i>Support the new proposed boundaries for Dean Street, Bond Street and the Promenade. Suggests that other areas of the resort, such as North Shore, should also be looked in as there is poor quality holiday accommodation in and around this area. Also identifies from Waterloo Road up to North Shore as an area which contains poor quality residential and holiday accommodation. Suggests more help should be given to hoteliers who provide good quality accommodation and are helping to attract visitor to Blackpool.</i>
David Hadwin	Keystone Design Associates Limited on behalf of the operators of the Henson Hotel	07.12.10	PB	Request that the building known as the Henson Hotel is not allocated in the core strategy as a within a main holiday accommodation area. Refers to a planning application seeking to demolish the hotel and replace with a residential development. States the hotel has significant structural issues, principally ground movement, and is not considered viable to invest more capital in the building, and it would be better placed to invest in another less vulnerable property and transfer the successful hotel business to a sea front hotel. Suggests the property is not located in an area of high incidence of holiday use/ hotels. All properties on Burlington Road are domestic properties as is the properties located to the east of the site, which are also flats.
Max Smith	Kintour Road	08.12.10	PB	<p>All the hoteliers on Bourne Crescent, New South Promenade, have been working with Blackpool Council on four planning applications which would together see a comprehensive redevelopment of the whole of Bourne Crescent. Three of the intended four 'portions' of the comprehensive scheme are already approved (the two leading ones at the extreme north and south ends of the Crescent being subject to the signing of a section 106 agreement on Affordable Housing).</p> <p>Both of the approved sites, i.e. the north and south ends of Bourne Crescent, are largely residential in nature with some type of restaurant/commercial feature(s) at ground-floor level. The upcoming planning application, is for an entirely residential scheme incorporating high-quality apartments with full leisure facilities at ground floor level. Because the main focus of the comprehensive redevelopment scheme is predominantly residential in nature, request that Bourne Crescent is removed from the main holiday accommodation promenade frontage, inline with the 'twin' neighbouring crescent immediately south of Bourne Crescent. Suggests the whole redevelopment will bequeath to Blackpool an iconic new feature on the south Blackpool oceanfront skyline, as it rises to 11 storeys in height in a spectacularly designed edifice.</p> <p>The "Fylde Coast Visitor Accommodation Study" envisages that "planning policy needs to reduce the extensive areas within which holiday accommodation is safeguarded", insofar as the Blackpool promenade is concerned, the Humberts Report concludes: "It recommends retaining protection for the major hotel areas on the promenade but reducing safeguarded areas or relaxing policy protection elsewhere".</p> <p>Applicants have already endeavoured to demonstrate that there exists on Bourne Crescent, and in its</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				immediately surrounding holiday neighbourhood along and adjacent to the New South Promenade, a spiral of decline in tourist business that is perceived to be irreversible. States the finished edifice is intended to offer some 400 residential apartments, together with a modest amount of retained/redeveloped holiday accommodation, and would be incongruous for a futuristic high-rise development on one of the quietest parts of the promenade to be classified as being a protected holiday area.
Mr O P McPartling	Osborne Road	11.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street.</i> There is good holiday accommodation in this area, it would be a shame to lose this area to just residential only.
Derek Robertson M.B.E.	Osborne Road	08.11.10	PB	<i>Object to the proposed boundaries for Osborne Road, in particular the exclusion of Osborne Road east of Bond Street. Object to the South Shore Travelodge remaining in the main holiday accommodation area.</i> Comments that there are many good guest houses located on Osborne Road, which have been in Blackpool longer than the Travelodge. Concerned that many guest houses outside the main holiday accommodation areas will covert to private houses and flats, with suggestions that this has already started to happen.
Wayne Sutton	Osborne Road	09.11.10	PB	<i>Support the new proposed boundaries for Dean Street and to add part of the Promenade. Object to the new proposed boundaries for Station Road, and Osborne Road.</i>
-	Osborne Road	12.11.10	PB	<i>Support the new proposed boundaries for Dean Street and Balmoral Road. Object to the new proposed boundaries for Station Road, Osborne Road, and Bond Street.</i> Suggests the main holiday accommodation area should be extended to include Osborne Road east of Bond Street as the road contains several good working guest houses. Questions what the plan is for the area if it is not included in the main holiday accommodation area. The street is located close to the Pleasure Beach, Sand Castle water park, Casino and the South Pier and feels it would be a good idea to be included ion the main holiday area. Questions why the Travelodge is included in the holiday area as many guest houses have been there longer. Concerned that thriving guest houses will suffer by being outside the main holiday accommodation area.
Mr & Mrs Morgan	Osborne Road	12.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street.</i> Suggests the removal of parts of the Pleasure Beach main holiday accommodation area may be related to the Blackpool Pleasure Beach owning most of the properties on Balmoral Road.
A Jones	Osborne Road	24.11.10	PB	<i>Objects to the new proposed boundaries for Osborne Road.</i> Questions what the options are for converting a property which is outside of the main holiday accommodation areas.
Mick & Joanne Hart	Osborne Road	02.12.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street.</i> Concerns raised that properties outside the main holiday accommodation area will not sell. Objects to the Blackpool South Travelodge being included in the main holiday accommodation area. Suggests the council should focus on ensuring poor quality commercial properties are improved.
Mike & Joanne Hart	Osborne Road	06.12.10	PB	Further to the above comments: Concerns raised that the value of businesses would be significantly reduced as a result of the proposed plans. Identifies that there are several flats proposed to be kept in the holiday area which are being used as permanent flats, some of which are in disrepair and in need of urgent works.

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>Questions why on the proposed plans the Travelodge, on the south side of Osborne Road, has been included in the main holiday accommodation area. Two hotels (on the same side as Travelodge) that are proposed to be omitted from the holiday area, have both kept up to date with fire regulations. Questions whether these costs will be reimbursed, and if business rates will be reduced for holiday accommodation properties outside the proposed main holiday accommodation areas. Concerned that being outside the main holiday accommodation area may reduce the number of customers.</p> <p>Suggests there should be a focus on improving commercial properties, which would make Blackpool a friendlier and better-looking place for the holidaymakers. Identifies the amount of derelict hotels on the sea front as an issue for the proposals.</p>
Nick Laister	RPS On behalf of Blackpool Pleasure Beach Ltd.	03.12.10	PB	<p>Object to the proposed exclusion of the southern side of Osborne Road west of Bond Street and the northern side of Balmoral Road, between Bond Street and the Blackpool South Travelodge (former Gables Balmoral Hotel). Blackpool Pleasure Beach (BPB) owns a large proportion of the properties on the north side of Balmoral Road, facing the park, and a number of properties on the south side of Osborne Road in the areas now excluded. Whilst it is acknowledged that these properties are not currently in holiday accommodation use, it is BPB's medium to long term intention to redevelop these units into modern hotel accommodation, to complement the Big Blue Hotel and current and future major investments in the park. As this SPD is a plan for the future, not the present, it is considered that these proposals are the key consideration in defining the boundary in this area.</p> <p>BPB has already extended the Big Blue Hotel, and is now actively considering more than one new hotel development on or adjacent to the Pleasure Beach site. In terms of the future viability of the business, the Company has decided that further high quality hotel development immediately adjacent to the park is necessary. It is generally accepted within the industry that resort accommodation is now a key component to the future viability of this type of business. Most other major amusement park attractions now feature accommodation, or are actively seeking permission for accommodation.</p> <p>BPB's intention is to redevelop a number of units on Balmoral Road, potentially including units behind on Osborne Road, to create a new hotel (or hotels) adjacent to the park. As stated in our previous representation, BPB is also considering a further hotel within the park itself, and this will be located either on the north car park area, or on The Star site. It is considered important for the land immediately surrounding Pleasure Beach to be of a mainly holiday character. The streets immediately fronting onto the Pleasure Beach are most critical to retaining the viability and attractiveness of this area. As BPB owns a large proportion of the properties on these two frontages, the Company has an ability to ensure that the areas stay in primarily holiday use and that these uses support the viability of the main tourist attraction.</p> <p>Policies in the Core Strategy and SPD promote the development of new hotels in the Main Holiday Accommodation Areas. The Draft SPD states that in these areas the Council will "permit new or improved visitor accommodation" and "promote the replacement of low quality older holiday accommodation", this is in</p>

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
				<p>line with BPB's plans for its properties on these streets.</p> <p>If these streets are excluded from this area, Core Strategy Policy R20 would apply, which is focussed on managing contraction and transition away from holiday accommodation. There is nothing in this policy that specifically supports the development of new visitor accommodation or the replacement of older accommodation with new hotels. Therefore the effect of the removal of these two areas from the Main Holiday Accommodation Areas is to undermine BPB's medium term investment plans.</p> <p>The Council has the support of the landowner, who is also operating the resort's most-visited tourist attraction, where the clear aspiration is not only to bring this street back into hotel use, but also to ensure that this use will be a significantly improved offer to that which existed previously. There is a strong land-use basis for these two streets to be re-instated due to their proximity to a major attraction, and the need for this attraction (and the other businesses around it) to have high quality accommodation close by.</p> <p>Consider that there is very strong argument for extending the area covered by the 'Main Holiday Accommodation Area' to reinstate the southern side of Osborne Road and west of Bond Street and the northern side of Balmoral Road.</p> <p>As BPB's plans for future development of accommodation becomes clearer, serious consideration is now being given to the potential for a hotel on The Star site, this would be an exciting opportunity to build another new Promenade hotel that integrates with the amusement park. We therefore ask that you give consideration to extending the Pleasure beach Promenade Frontage to include The Star site and the parcel of land immediately to the north of The Star.</p>
Alan Wrigley	Simpson Street	11.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street.</i>
Jean Platt	Station Road	11.11.10	PB	Suggests removing all the holiday areas, allowing badly maintained or derelict buildings to be sold and improved as private accommodation and therefore improving the area. Considers that the promenade in particular should be removed from the holiday areas and priority given to good quality residential conversions.
Mr & Mrs Thomason	Withnell Road	11.11.10	PB	<i>Support the new proposed boundaries for Dean Street Station Road, Osborne Road, Balmoral Road and Bond Street. Object to the new proposed boundary for the Promenade. States that Dean Street is an excellent street for holiday accommodation and should be included in the main holiday accommodation area. Station Road is mainly a retail area and so should not be included. Supports exclusion of Osborne and Balmoral Road but the Travelodge should also be removed. Describes Bond Street as being in a very poor state with many shops closed and boarded up and is not a holiday area. Suggests the promenade should not be designated as properties in this location will always do business.</i>
-	Withnell Road	26.11.10	PB	<i>Support the new proposed boundaries for Dean Street and the Promenade. Object to the new proposed boundaries for Station Road, Osborne Road, Balmoral Road and Bond Street.</i>
<i>General (Gen)</i>				
V O'Shea	Portree	08.11.10	Gen	No comments to make

Name/ Consultee	Address	Date Received	Holiday Area	Summary of Response
	Road			
Ian Calloway	Abbots Court	08.11.10	Gen	In broad agreement with the plans but aware that good quality accommodation is currently outside these boundaries, questions what will happen to such properties. Additionally, questions how will improved standards of accommodation be secured and how will enforcement of poor accommodation will be carried out.
Elaine Smith	Preston New Road	08.11.10	Gen	No comments to make
David Nield	Faringdon Avenue	09.11.10	Gen	No comments to make
Lesley M Bosworth	Haig Road	16.11.10	Gen	Questions how the proposals will give a unified holiday area in each district when the proposed premises are broken into small, separate blocks, suggest the eventual outcome is likely to be 'bitty'. Suggests it is more logical to take a whole block, if necessary removing the holiday ambience from streets around the block despite their currently being holiday premises. Recognises that current owners may object but suggests the overall picture cannot be decided on the requirements of individuals.
Simon Marley	Leyfield Close	19.11.10	Gen	No comments to make
Councillor Douglas H Green	Stony Hill Avenue	20.11.10	Gen	Raises concerns that excellent hotels and accommodation will always fall outside the main holiday accommodation areas no matter where the boundaries are drawn, and that inclusion in the area, does not imply that the hotels are of good standard. Suggests the need to encourage the development of 21st Century hotels inside the areas, suggesting visitors want modern standards inside new facilities however it is recognised that the proprietors of older hotels will wish to contest these. Suggests there is no policy in place to demand that hotels outside the area do not fall into use as HMOs. Suggests this should be a target to achieve over a number of years, and proper plans must be to register all relevant businesses inside the area, and for proper re-development of all relevant businesses that fall outside the areas. Suggests that without proper funding problems may arise with the alternative development of older properties.

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

First Round of Public Consultation Responses (May to July 2010)

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.

Consultee	Date Received	Summary of Response
Network Rail	04.06.10	No comment to make
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

Consultee	Date Received	Summary of Response
		<p>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 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>

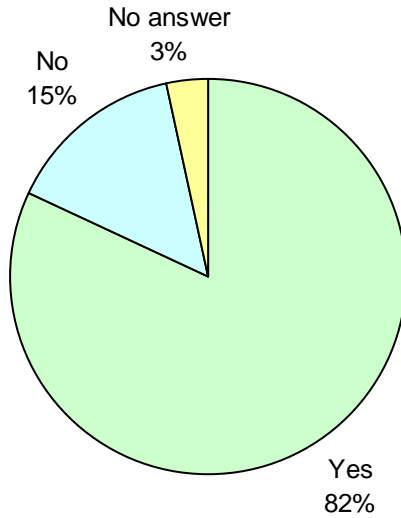
Second Round of Public Consultation Responses (November to December 2010)

Consultee	Date Received	Summary of Response
The Lancashire and Blackpool Tourist Board	10.11.10	The Lancashire and Blackpool Tourist Board would agree with the proposed changes to boundary areas which will support the further inclusion of accredited accommodation providers, thus helping to maintain a focus on providing a high quality offer to visitors. We would also reiterate the need to continue this focus on quality, increasing understanding of the benefits of accreditation and encouraging more businesses to seek accreditation.
The Coal Authority	10.11.10	The Coal Authority have no specific comments to make on this document at this stage.

Consultee	Date Received	Summary of Response
Highways Agency	17.11.10	The Highways Agency has no comments to make.
Lancashire County Council	17.11.10	Further to your email received 8th November, no comments are made from a strategic planning point of view.
Natural England	18.11.10	<p>Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has no comment to make in relation to this application. From the information provided with this application we do not feel that the proposals are likely to significantly affect the natural environment.</p>
Nathaniel Lichfield and Partners on behalf of Bourne Leisure Ltd.	30.11.10	No additional comments to those submitted on behalf of Bourne Leisure Ltd. on 28 June 2010, and that the comments expressed in the letter of 28 June 2010 still stand.
The Theatres Trust	6.12.10	<p>The Theatres Trust is The National Advisory Public Body for Theatres and currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include <i>'development involving any land on which there is a theatre.'</i></p> <p>No comment to make but look forward to being consulted on further LDF documents.</p>

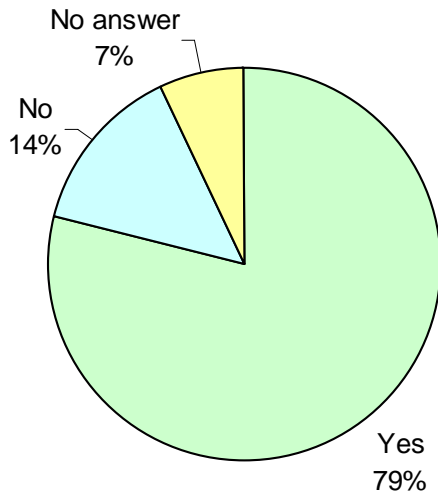
Appendix 3c: Summary of Questionnaire Responses

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

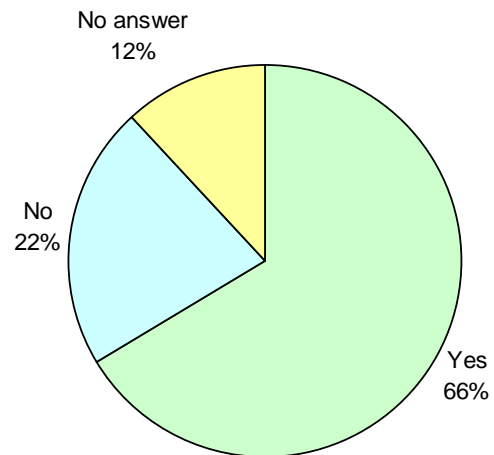


Irrespective of the precise boundaries, do you agree with:

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



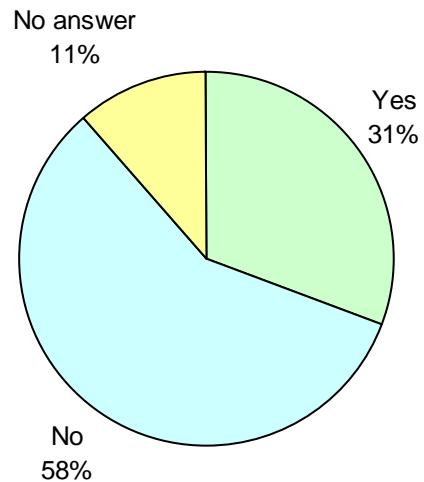
Q3 the safeguarding of holiday accommodation on the **Main Promenade Frontage**, alongside a new seafront residential offer?



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

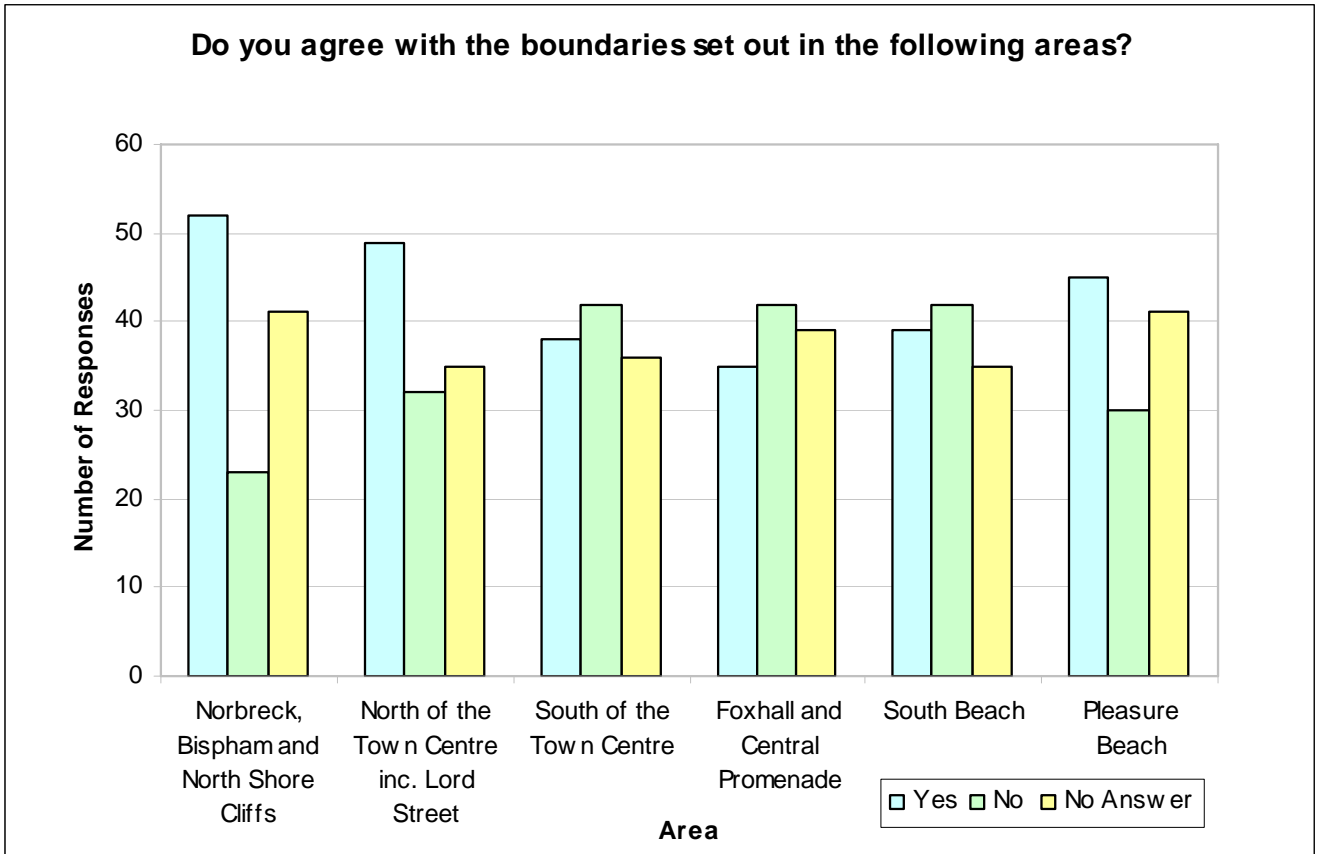


Q5 the proposed approach on the **Mixed Neighbourhoods?**

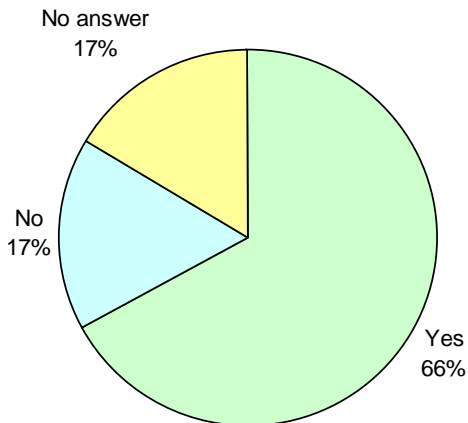


Q6 Do you agree with the boundaries set out in the following areas?

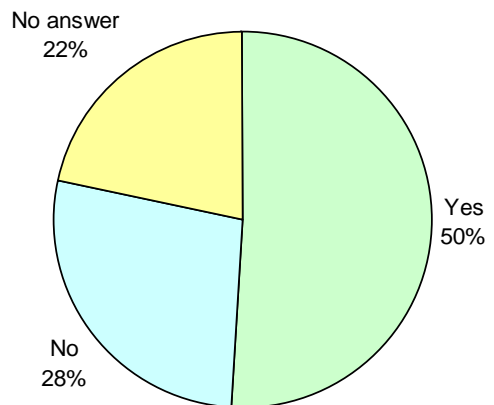
1. Norbreck, Bispham and North Shore Cliffs
2. North of the Town Centre
3. South of the Town Centre
4. Foxhall and Central Promenade
5. South Beach
6. Pleasure Beach



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?



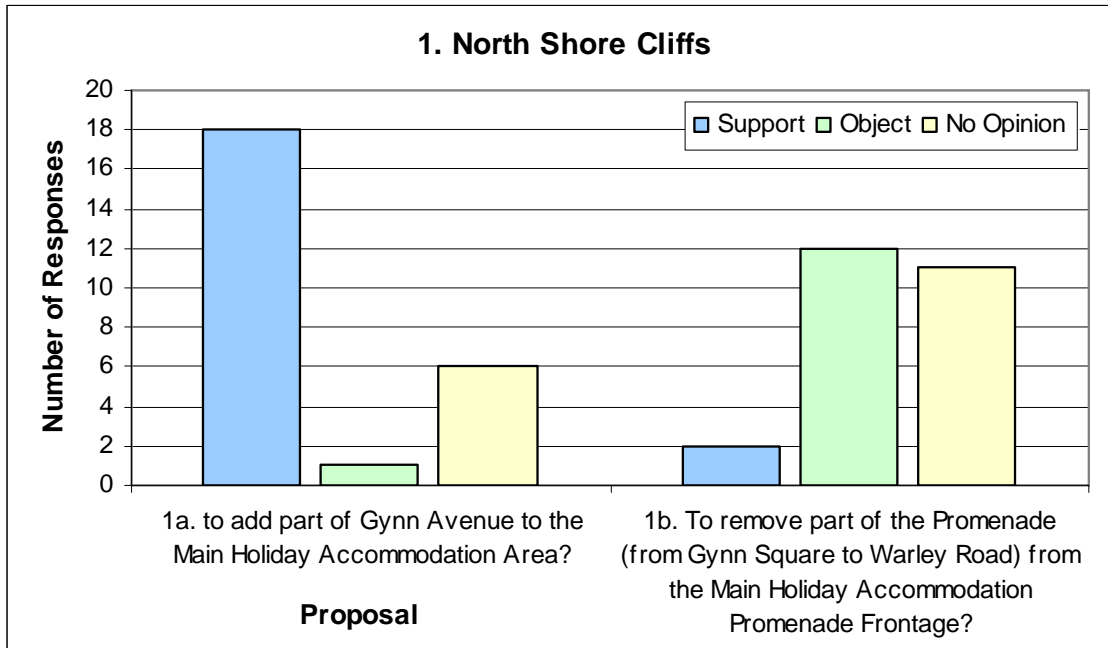
Appendix 3d: Summary of Responses to the Second Round of Consultation

1. North Shore Cliffs

Do you support or object to the new proposed boundaries in you area:

1a. to add part of Gynn Avenue to the Main Holiday Accommodation Area?

1b. To remove part of the Promenade (from Gynn Square to Warley Road) from the Main Holiday Accommodation Promenade Frontage?

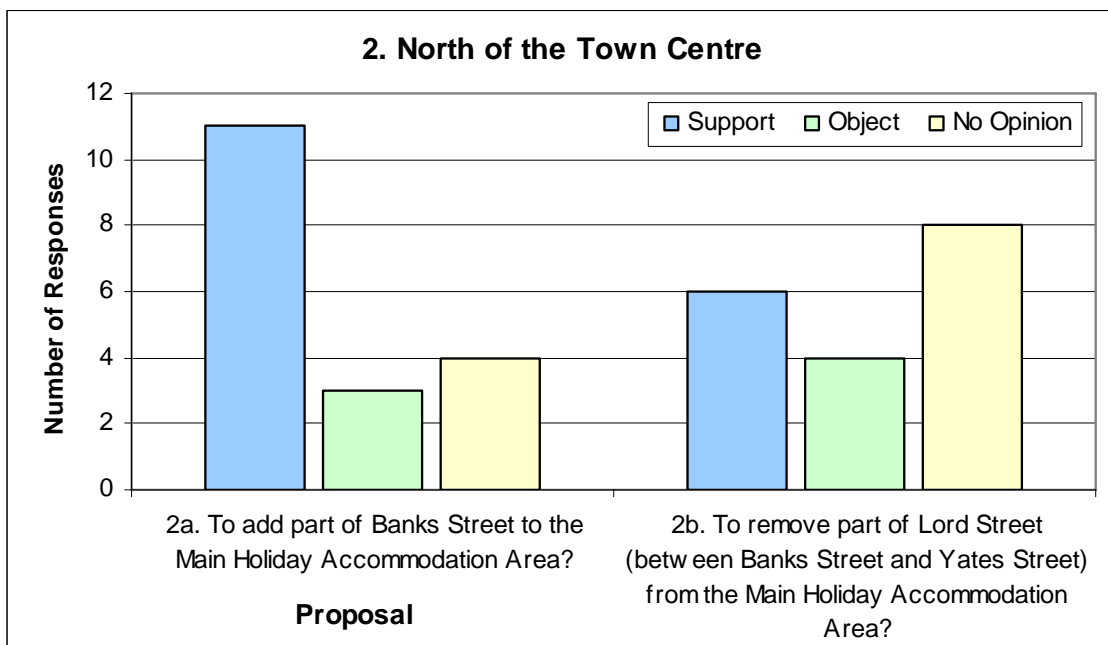


2. North of the Town Centre

Do you support or object to the new proposed boundaries in you area:

2a. To add part of Banks Street to the Main Holiday Accommodation Area?

2b. To remove part of Lord Street (between Banks Street and Yates Street) from the Main Holiday Accommodation Area?

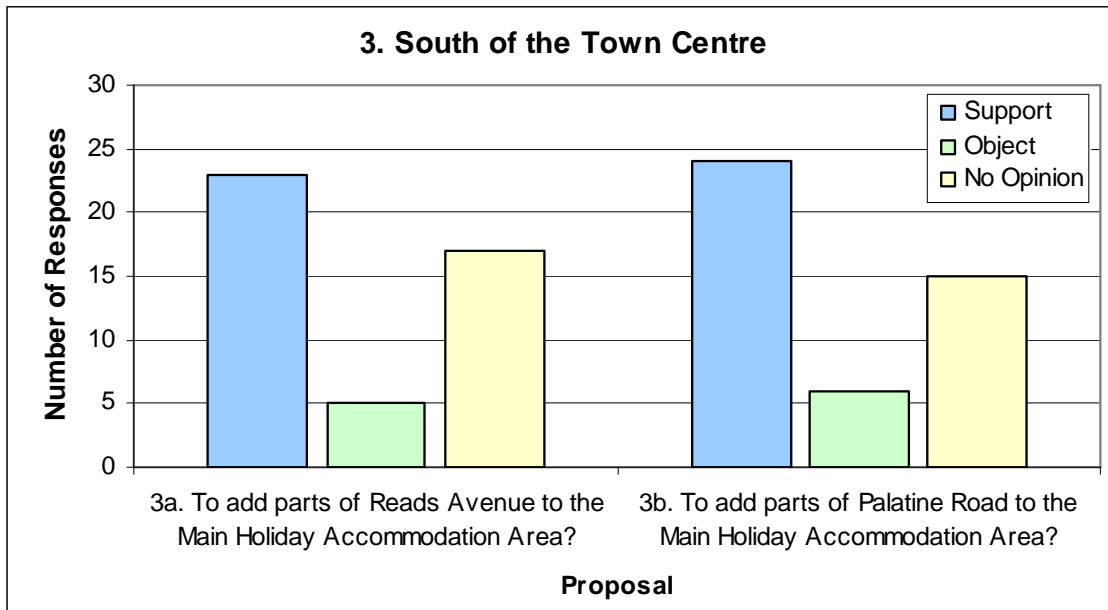


3. South of the Town Centre

Do you support or object to the new proposed boundaries in you area:

3a. To add parts of Reads Avenue to the Main Holiday Accommodation Area?

3b. To add parts of Palatine Road to the Main Holiday Accommodation Area?



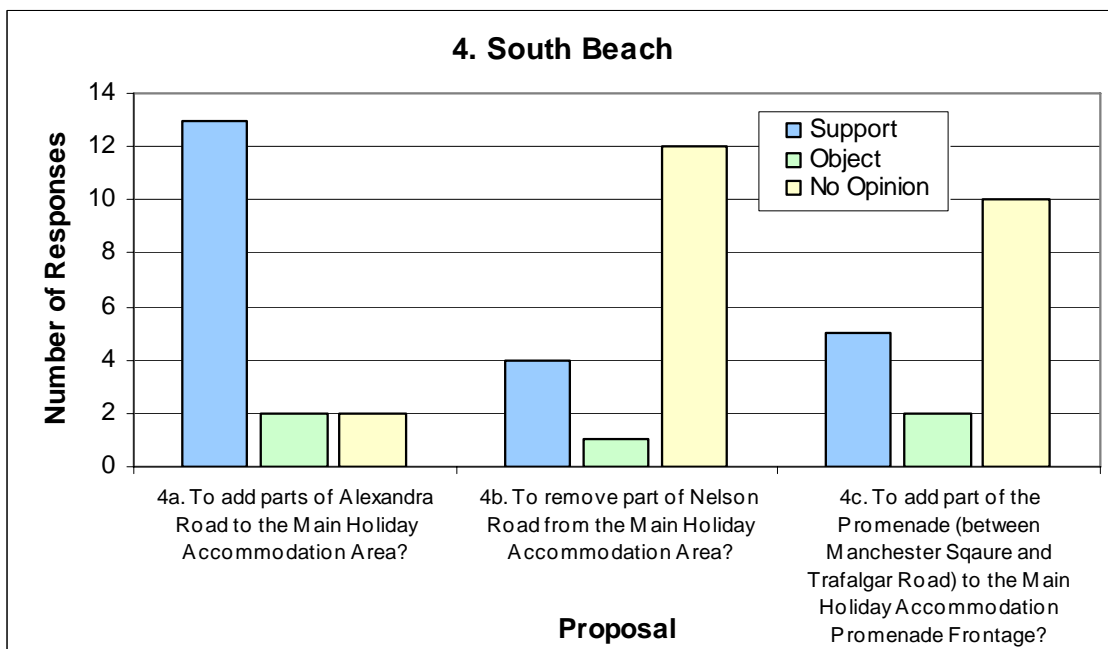
4. South Beach

Do you support or object to the new proposed boundaries in you area:

4a. To add parts of Alexandra Road to the Main Holiday Accommodation Area?

4b. To remove part of Nelson Road from the Main Holiday Accommodation Area?

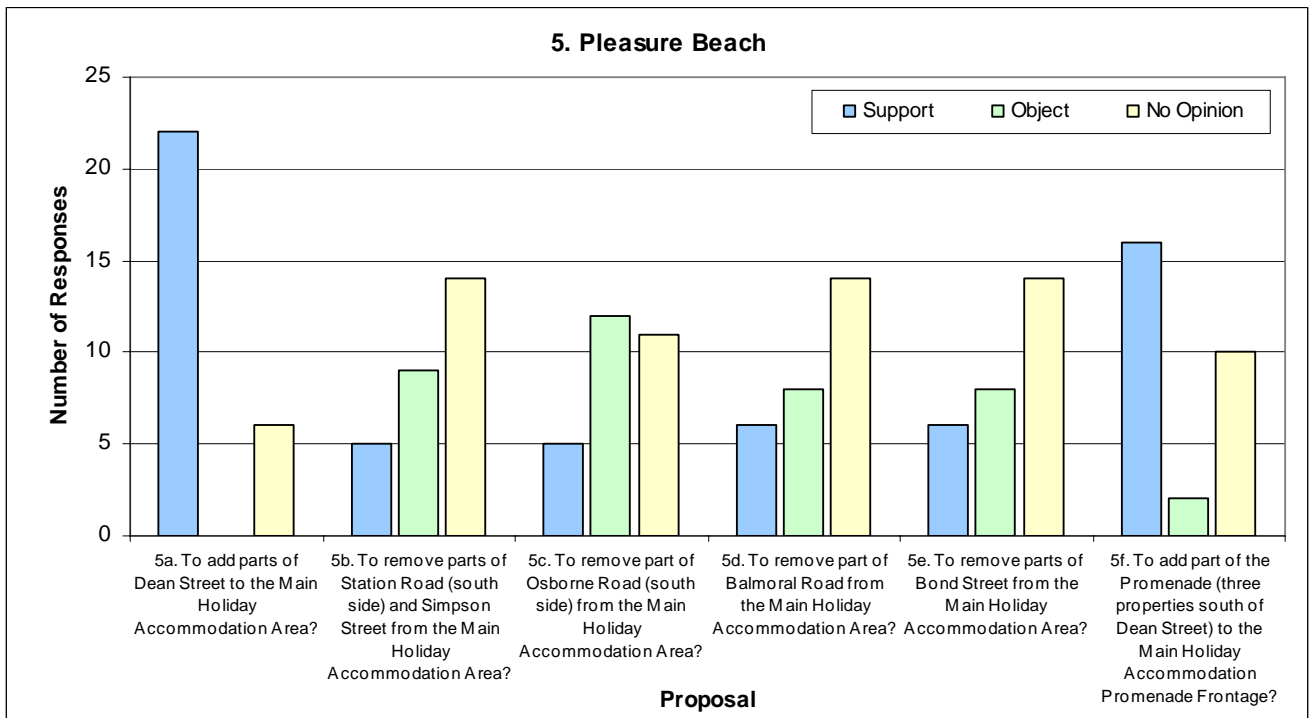
4c. To add part of the Promenade (between Manchester Square and Trafalgar Road) to the Main Holiday Accommodation Promenade Frontage?



5. Pleasure Beach

Do you support or object to the new proposed boundaries in you area:

- 5a. To add parts of Dean Street to the Main Holiday Accommodation Area?
- 5b. To remove parts of Station Road (south side) and Simpson Street from the Main Holiday Accommodation Area?
- 5c. To remove part of Osborne Road (south side) from the Main Holiday Accommodation Area?
- 5d. To remove part of Balmoral Road from the Main Holiday Accommodation Area?
- 5e. To remove parts of Bond Street from the Main Holiday Accommodation Area?
- 5f. To add part of the Promenade (three properties south of Dean Street) to the Main Holiday Accommodation Promenade Frontage?



Appendix 3e: 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:** Nicola 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)