

Planning Statement

The Cove Hotel, 9 Banks Street, FY1 1RN

On behalf of MAL Investments Ltd

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1. Introduction

- 1.1. This Planning Statement has been prepared on behalf of MAL Investments Ltd ('the applicant') to support a full planning application for a change of use from hotel (Use Class C1) to serviced holiday apartments for short term let (Sui Generis).
- 1.2. This Planning Statement considers the proposed development against relevant planning policy and provides an assessment of the development, setting out the planning reasons why the planning permission should be granted.
- 1.3. The application is supported by the following documents:
 - Application forms and certificates;
 - Plans and Drawings:
 - Location Plan and Block Plan (ref: 90)001);
 - Existing Ground Floor Plan (ref: (03) 000);
 - Existing Basement Plan (ref: (03) 000B);
 - Existing First Floor Plan (ref: (03) 001);
 - Existing Second Floor Plan (ref: (03) 002);
 - Existing Third Floor Plan (ref: (03) 003);
 - Proposed Ground Floor Plan (ref: (20) 000);
 - Proposed Basement Plan (ref: (20) 00B);
 - Proposed First Floor Plan (ref: (20) 001);
 - Proposed Second Floor Plan (ref: (20) 002); and
 - Proposed Third Floor Plan (ref: (20) 003).
- 1.4. This Statement begins with a description of the site and surrounding area, as well as the planning history in Section 2, before going on to provide a more detailed description of the development in Section 3. Section 4 provides a review of the relevant national and local planning policies, in the context of the application. Section 5 assesses the proposed development plan and other material considerations, and Section 6 provides the overall conclusions.
- 1.5. The proposed development is in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, and presents an opportunity to secure economic, social and environmental gains in accordance with the NPPF.

2. Site and Surrounding Area

The Application Site

- 2.1. The site is located on the corner of Banks Street and General Street, Blackpool.
- 2.2. The site comprises a 5-storey building, which includes; a basement, ground floor, first floor, second floor and third floor. The existing layout comprises of a communal lobby, lounge and kitchen area on the ground floor, four ensuite bedrooms on the first floor and four ensuite bedrooms on the second floor. The second floor and the basement are unused.
- 2.3. The building was former used as a hotel, under Use Class C1 and was known as the Cove Hotel. The hotel closed over 20 years ago and since this time, has been vacant.
- 2.4. The site is an end property, with Margaret's Private Hotel located on the other side of the hotel. There are a number of hotels and examples of visitor accommodation in this area.
- 2.5. The site is allocated within the defined Inner Area and the North Town Centre Holiday Accommodation Area.
- 2.6. The site falls within Flood Zone 1, which has the lowest probability of flooding.
- 2.7. The building is not listed, nor are there any listed buildings adjacent to the site. The site is not located within a conservation area.

Surrounding Area

- 2.8. The site is located within the heart of Blackpool Town Centre. Blackpool is underpinned by tourism and the service sector and provides an important sub-regional retail, cultural and business centre for the Fylde Coast.
- 2.9. Regeneration within Blackpool Town Centre, the resort core and neighbourhoods within the inner areas is crucial to strengthening the economy.

Planning History

- 2.10. We have reviewed the Council's website and there are no applications of relevance this proposal.

3. The Proposed Development

3.1. The application seeks permission for;

'Change of use of existing hotel (Use Class C1) to 4no. serviced apartments (Sui Generis)'

3.2. Under the Town and Country Planning (Use Classes) Order 1987 (as amended), the site operated under Use Class C1 (hotels). This application seeks to change the use of this building to create 4 serviced apartments for short term holiday let, which falls with the 'Sui Generis' use class.

3.3. The site currently comprises a vacant 8-bedroom hotel which is spread over 5 floors: basement, ground floor, first floor, second floor and third floor. The hotel has been vacant for over 20 years and this proposal seeks to bring the site back into active use and seeks to provide serviced apartments for short term holiday lets.

3.4. Four apartments are sought in total, which will comprise:

- Ground Floor – 1no. one bedroom apartment (48 sq. m);
- First Floor – 1no. three-bedroom apartment (71 sq. m);
- Second Floor – 1no. two-bedroom apartment (48 sq. m); and
- Second Floor – 1no. studio apartment (22 sq. m).

3.5. There is a basement within the property however no development or apartments are proposed in the basement.

3.6. The third floor, which comprises predominantly roof space, will comprise of a service area where supplies will be located, including; bedding, toiletries etc.

3.7. No external alterations are proposed to the building to accommodate the proposed use.

4. Planning Policy and Guidance

- 4.1. Applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section sets out the relevant policies of the adopted Development Plan and any material considerations of relevance to the determination of this application.

Adopted Local Planning Policy and Guidance

- 4.2. The adopted Development Plan for Blackpool Council comprises; the Core Strategy (Part 1) and saved policies from the Blackpool Local Plan (2001 – 2016).
- 4.3. As shown in Figure 1 below, the site is located within the Inner Area, which is designated under Policy CS1 of the Core Strategy and emerging Policy DM5.

Figure 1 – Adopted Policies Map



Local Plan Part 1: Core Strategy (Adopted 20th January 2016)

- 4.4. The policies below are of relevance to this proposal:
- Policy CS21 Leisure and Business Tourism; and
 - Policy CS23 Managing Holiday Bed Spaces.

Saved Policies from the Blackpool Local (2001 – 2016)

- 4.5. The policies below are of relevance to this proposal:
- Policy BH3 Residential and Visitor Amenity;
 - Policy HN5 Conversions and Sub-Divisions; and

- Policy ASI Access, Parking and Highway Safety.

Supplementary Planning Documents

4.6. The following supplementary planning documents are also of relevance to the proposal.

Holiday Accommodation SPD (November 2017)

4.7. The Holiday Accommodation SPD is of relevance to this proposal. The site is located within the 'North Town Centre Main Holiday Accommodation Area', as shown in Figure 2 below.

Figure 2 – North Town Centre Main Holiday Accommodation Area



4.8. Within this area, a change of use will only be permitted where:

- Suitable evidence is provided to demonstrate to the satisfaction of the Council that the business is no longer viable and has no reasonable prospect of continuing as holiday accommodation; and
- The proposed use is compatible with the holiday accommodation uses in the street and provides regeneration benefits.

Emerging Local Planning Policy

4.9. The emerging Local Plan consists of the Local Plan Part 2: Site Allocations and Development Management Policies. This plan is at an advanced stage. The examination hearing sessions were held between the 6th and 10th December 2021.



- 4.10. The Inspector issued the post-hearings letter on the 30th of March 2022 and the Council have acknowledged these comments and are now working on a schedule of proposed modifications, which will be subject to consultation in due course.
- 4.11. Given the advanced stage of the plan, the policies within this emerging Local Plan should be given material consideration in the determination of the application.
- 4.12. The policy of relevance to this proposal is as follows:
- Policy DM5 Residential Conversions and Sub-Divisions.

National Planning Policy Framework (July 2021)

- 4.13. The NPPF was originally published in March 2012, with a revised version adopted in July 2018, February 2019 and July 2021. As outlined in paragraph 2, the Framework is a material consideration in planning decisions. We provide a succinct summary of the relevant themes and policies in the NPPF in the following paragraphs.
- 4.14. Paragraph 8 confirms that in order to achieve sustainable development, the planning system has three overarching objectives which need to be pursued. These are economic, social and environmental objectives.
- 4.15. Paragraph 11 of the NPPF outlines the well-known requirements to apply the presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with the Development Plan without delay.
- 4.16. The following sections of the NPPF are of relevance to this application:
- Chapter 6 – Building a strong, competitive economy;
 - Chapter 8 – Making effective use of land; and
 - Chapter 12 – Achieving well-designed places.

5. Assessment of Development Proposals

- 5.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the Development Plan unless material considerations indicate otherwise.

Key Planning Considerations

- 5.2. The following key considerations are considered relevant in respect of the proposed development:
- Principle of Development;
 - Amenity;
 - Access, Highways Safety and Parking;
 - Economic Considerations; and
 - Other Considerations.

Principle of Development

- 5.3. This application seeks a change of use from the existing use, which is Class C1 – Hotel to Sui Generis. This change of use would bring the site back into active use, after over 20 years of being vacant and will allow the site to operate as 4 serviced apartments for short term holiday let.
- 5.4. As noted in Section 4 of this statement, the site is located within the 'North Town Centre Main Holiday Accommodation Area', under the Holiday Accommodation SPD, which was adopted in November 2017. This SPD notes that a change of use will only be permitted where; evidence can be provided to demonstrate that the business is no longer viable and has no prospect as continuing as holiday accommodation and the use is compatible with holiday accommodation uses.
- 5.5. Policy CS21 of the Core Strategy states that new visitor accommodation should be focused around the town centre and defined holiday accommodation. Policy CS23 of the Core Strategy similarly states that within the main holiday accommodation areas, such as this existing holiday accommodation uses will be safeguarded.
- 5.6. The proposal complies with the requirements of this SPD and Policies CS21 and CS23. Although a change of use is required, the proposed use would still provide holiday accommodation albeit in a slightly different format than the existing use of the site. The proposed use of the property as serviced, short-term apartments would retain the holiday function, allowing guests to book a self-contained holiday flat, similar to booking a hotel room. The scheme would continue the use of the property for tourists, in compliance with Policies CS21, CD23 and the Holiday Accommodation SPD.
- 5.7. As noted previously, the site has been vacant for over 20 years which clearly demonstrates that a hotel is no longer a suitable and viable option for the site. This proposal will provide holiday accommodation in the form of serviced apartments, providing a range of studio, one-,



two- and three-bedroom apartments, to cater for the varying needs of visitors to Blackpool. The redevelopment of the hotel, to accommodate the holiday apartments will regenerate the site and bring it back into active use.

- 5.8. The scheme therefore is acceptable in principle.
- 5.9. Although the Local Plan Part 2 has not yet been formally adopted, it is at an advanced stage and therefore it is worth noting draft Policy DM5 Residential Conversions and Sub-Divisions. This policy states that within the inner area, which is where this site is located, development will not be permitted where the proposal involves extensions to the property or utilising the roof space or basement for residential use.
- 5.10. As noted in Section 3, this proposal does not involve any external alterations nor is the use of the roof or basement proposed for the holiday apartments, and therefore the proposal complies with this emerging policy.

Amenity

- 5.11. As noted in Section 3 of this Statement, the change of use will create 4 serviced apartments of varying size, including:
- Ground Floor – 1no. one bedroom apartment (48 sq. m);
 - First Floor – 1no. three-bedroom apartment (71 sq. m);
 - Second Floor – 1no. two-bedroom apartment (48 sq. m); and
 - Second Floor – 1no. studio apartment (22 sq. m).
- 5.12. Policy HN5 Conversions and Sub-Divisions states that proposals for the change of use of existing buildings for residential use will be permitted provided that the units are self-contained and satisfy the Council's floorspace and amenity standards.
- 5.13. Emerging Policy DM5 states that proposals for the change of use of existing buildings for residential use will only be permitted where the proposed units are fully self-contained and satisfy the National Described Space Standards and the Council's adopted floorspace and amenity standards. This policy has not been formally adopted yet and therefore this specific policy cannot be given full weight.
- 5.14. In terms of Policy HN5, this proposal does not seek to provide residential uses, and therefore this policy is not of relevance to this proposal. The proposed change of use is to Sui Generis. Sui Generis is a Latin term that, in this context, means 'in a class of its own'. This use class and term is used to categorise buildings that do not fall within any particular use class for the purpose of planning permission. This proposed use is classed as Sui Generis as it falls outside the defined limits of any other use class. As such, this proposal does not seek to create a residential use.
- 5.15. From a review of other similar change of use planning applications which have been determined in the borough, the Council have referred to National Described Space Standards for housing, the New Homes SPD and the need to comply with these standards. These standards should not apply to this proposal as these standards relate to new dwellings, for residential purposes. This proposal does not propose to create typical residential

accommodation where occupants will reside on a permanent basis. The proposal seeks to provide short-term holiday apartments where occupants will reside for a limited number of nights. These apartments will not form homes for the occupants, nor will the occupants reside there on a permanent basis. Hotel rooms are not required to be of a certain size, as it is recognised that these are only used on a temporary, short stay basis, and therefore the sizing of the proposed apartments should be considered in the same light.

- 5.16. As such, Policy HD5 is not of relevance to this proposal and therefore there is no need to comply with this policy.
- 5.17. In terms of other standards of amenity, Policy BH3 states that developments will not be permitted which would adversely affect the amenity of those occupying residential and visitor accommodation.
- 5.18. In terms of separation distances to the side and the rear of the property, this is not relevant to the proposal as the scheme does not propose to extend the property. No external alterations are proposed to the building to accommodate the change of use.
- 5.19. In terms of noise, the property was previously used as a hotel and therefore there would have been a certain amount of coming and going to the property from hotel guests. The property is in a main holiday area, which will experience a higher level of background noise in comparison to residential areas. The property only has one other property attached to it, as it is an end property. On the other side of the hotel is another hotel, which is known as Margaret's private hotel. Two similar uses are proposed side by side, and therefore no issues would arise as a result of noise.
- 5.20. The proposal will provide four self-serviced apartments. To access the apartments, keys/fobs will be available via a locked box on site which will facilitate check in and check out for the guests. Although there will be no reception or staff on site, the apartments will be managed by a local management company. Contact details will be provided for both guests and neighbours to contact the company, at any time day or night, should any issues arise. This will ensure that any issues are addressed immediately, as and when they arise.
- 5.21. As such the proposal complies with the requirements of saved policy HD5 as it has been demonstrated that it would not adversely affect the amenity of those occupying residential and visitor accommodation.

Access, Highway Safety and Parking

- 5.22. Policy AS1 states that new development will only be permitted where the access, travel and safety needs of all affected by the development are met.
- 5.23. There is no car parking included within the scheme, however in a town centre location, such as this one, designated parking is not necessary. The site is within close proximity to a range of transport amenities which would mitigate the need to provide designated parking. This will encourage customers to use sustainable modes of transport as opposed to travelling by car.
- 5.24. The site is in close proximity to bus services, tram services and rail services. Located on The Promenade, 75m to the west of the site, is a bus stop which provides services every 30 mins to Squires Gate and St Annes. Located 350m to the south of the site (a 4-minute walk) is the North Pier Tram Stop. Located 500m to the east of the site, comprising a 6-minute walk, is



Blackpool North Train Station which provides national services to variety of destinations, including: London, Liverpool, Manchester and York.

- 5.25. Should some guests wish to travel by car, there is a pay and display car park, located 120m (a 2-minute walk) to the north of the site which is open 24 hours daily.
- 5.26. The site is in an extremely sustainable location which would mitigate any need to provide car parking spaces for the proposal. The existing hotel did not have any dedicated car parking space which was accepted and therefore there are no changes to the existing situation.
- 5.27. The access to the apartments will remain as per the existing access into the hotel, via Banks Street to the front of the property.
- 5.28. The proposal has fully considered access, travel and safety to the site and therefore complies with Policy AS1.

Economic Considerations

- 5.29. Chapter 6 of the NPPF seeks to create a strong and competitive economy, where businesses can invest, adapt, and expand. This proposal seeks to bring this site back into active use, after being vacant for over 20 years. MAL Investments Ltd seek to invest in this site and Blackpool to provide new visitor accommodation to the area, which will encourage a greater level of visitors.
- 5.30. The scheme will have a positive impact on the local economy, through the creation of short-term jobs during the fit out of the apartments, and the long-term employment from those servicing the holiday apartment and the local management company. All the work involved in the change of use will be carried out by Fylde Coast based companies which will further increase the local investment and economic benefits of the scheme. The re-use of this building will also help to support local shops, services, and the tourism industry in Blackpool. As such, the proposal fulfils the requirements of Chapter 6 of the NPPF.



6. Conclusion

- 6.1. This Planning Statement supports a full planning application for a change of use from hotel (Use Class C1) to serviced holiday apartments for short term let (Sui Generis).
- 6.2. The site has been vacant for over 20 years and this proposal will seek to bring new life into the building by providing additional visitor accommodation to support the tourism industry for Blackpool.
- 6.3. Although a change of use is required, the proposal seeks to retain the building for visitor accommodation and therefore complies with Policies CS21 and CS23 of the Core Strategy and the Holiday Accommodation SPD.
- 6.4. The proposal seeks to bring forward holiday apartments for short term let. Guests will reside in the apartments on a short-term basis and therefore this use is not classed a residential use, meaning that the proposal would not need to comply with space standards for residential accommodation.
- 6.5. The scheme will have a positive impact, through the creation of short term and long-term jobs and supporting local shops, services, and the tourist industry.
- 6.6. The scheme represents sustainable development which complies with the adopted local plan and the NPPF. As such, planning permission should be granted without delay.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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