



Planning Statement

3 King George Avenue

Blackpool

FY2 9SN

April 2022

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1.0 Introduction

Background

- 1.1 JMP North West Ltd have been instructed by Joseph Boniface Architects to prepare and submit a planning application for the following development, namely:

“Change of use of 3 King George Avenue, Blackpool from single dwelling (use class C3) to serviced accommodation (Sui Generis).”

- 1.2 This statement will address the relevant national and local planning policies that deal with the principle of the proposed development, and the pertinent planning matters associated with the scheme. This will be addressed as set out below:

- Section 2 – Application Site Context
- Section 3 – Planning History
- Section 4 - Relevant Planning Policy – National Planning Policy Framework
- Section 5 – Relevant Planning Policy – Cheshire West and Chester Local Plan
- Section 6 - Other Material Considerations
- Section 7 – Conclusion

Principle of Development

- 1.3 The National Planning Policy Framework is supportive as a matter of principle of development within built up areas, particularly on sites which are sustainably located.
- 1.4 It is therefore our view that the development subject of this application is compliant with the provisions and principles of local and national planning policy. Further, that there are other material considerations which also weigh in favour of the grant of consent, and we would therefore kindly request that this application be approved without delay.

Submitted Documentation

- 1.5 This planning application is supported by the following documents and drawings:
- Existing and Proposed Elevations, sections and Floor Plans;
 - Site Layout Plan (Existing and Proposed);
 - Location Plan; and

- Planning Statement

2.0 Application Site Context

- 2.1 The application site is approximately 280 sqm in area and is within the built-up development area of Blackpool.
- 2.2 The development site currently comprises a semi-detached three storey, 7-bedroom, single dwelling with associated garage and garden area to the rear. The property is situated to the north of the town centre and is located within an area characterised by hotels, guest houses and other forms of visitor accommodation. The Savoy Hotel Blackpool is directly to the west of the application site, The Strathmore Hotel is located to the east and is attached to the application site. The proposed use of 3 King George Avenue is therefore compatible with the character of the local area.
- 2.3 There is additional on-street car parking on King George Avenue and pay and display car parking available in the local area at Gynn Square, with additional limited on street parking provision in the wider locale.
- 2.4 The property is well served for public transport with bus stops located on Queen's Promenade and on Warbreck Hill Road. Gynn Square tram stop is also within walking distance of the application site. Rail services and other key services and facilities are also available within Layton and Blackpool Town Centre. The site is also well located for access to vital outdoor spaces with good access on foot to the local coastline and Jubilee Gardens. The site is therefore understood to be sustainably located to serve the development proposed.
- 2.5 The site subject of this application is not listed. The nearest listed building is the Grade II listed Savoy garage on the opposite side of King George Avenue. The property is also understood to be located within the North Promenade Conservation Area. Given that this proposal simply relates to the proposed change of use of the existing building, with only minor fenestration changes to the property, there is not deemed to be any resultant harm on the designated heritage assets, nor on their setting. One could argue that the viable

reuse and improvement of this property will in fact enhance the character and appearance of the Conservation Area.

- 2.6 From a review of the Environment Agency Flood Map it is noted that the application site is not located within an area at risk from flooding.

Proposed Development

- 2.7 The development subject of this application comprises the change of use of the existing 7-bedroom single dwelling, to a 5-bedroom single unit of serviced accommodation. The proposal comprises some internal alterations to the existing layout of the property, with some minor external alterations including the enhancement of the existing dormer at roof level.
- 2.8 There will be additional minor alterations to the rear of the property in relation to the retention of off-street parking for one vehicle, and enhanced outdoor amenity space to the rear of the property.
- 2.9 None of the physical changes proposed to the structure of the building are deemed to be material and will not result in harm to the visual amenities of the local area, the Conservation Area nor on neighbour amenity. In fact, the proposals will in fact result in an improvement and enhancement of the existing site to the benefit of the local area.

3.0 Planning History

- 3.1 From a review of the Council website, it is noted that the site planning history can be detailed as follows:

Application Ref: 91/0945

Description of Development: Erection of Single Storey Rear Extension

Decision: Approved

Date of Decision: 18th October 1991

Application Ref: 03/0274

Description of Development: Use of premises as a single private dwellinghouse

Decision: Refused

Date of Decision: 20th May 2003

3.2 The forms submitted with this application confirm that prior to this proposal the site was in use as a hotel.

3.3 The formal consultation response from Regeneration and Corporate Services date 15th April 2003 advises that *'There appears to little incidence of residential use in this part of King George Avenue and no basis in existing or proposed local plan policy to support the principle of change out of holiday use.'*

3.4 It is understood that the application was refused for the following reason, namely:

"1. The proposed change of use would be contrary to the provisions of Policy T8 of the Blackpool Borough Local Plan, and Supplementary Planning Guidance Note 10, which seek to safeguard as far as possible the existing character of the Main Holiday Area.

The application property is part of a streetscene which is characterised by holiday accommodation uses and popular with staying guests. Approval of the proposal would make it difficult for the Local Planning Authority to resist other similar changes of use in the vicinity which, if implemented would lead to an incremental and undesirable change in the character of the holiday area contrary to the general aims of Policy T8."

3.5 It is understood that the decision was taken to appeal the Council's refusal, but this proposal was then dismissed on appeal, with the Inspector advising:

"7. The appeal site is within the first block to the east of Queen's Promenade. It is bounded on the west by the rear of the Savoy Hotel, which fronts onto Queen's Promenade. On the east side, it is attached another hotel. The proposal does not therefore satisfy one of the SPG10 criteria for allowing change of use to residential, as there are no permanent residential uses directly adjoining or abutting both sides.

8. *At least half of the properties in the block appear to be in some form, of holiday occupation. Further to the east, there is a much greater proportion of residential properties...*

“14. I have had regard to the appellants’ statement that the hotel business is no longer self-supporting. Nevertheless, there is no firm and clear cut evidence that the property has no viable future as holiday accommodation...”

3.6 It is therefore clear that the development subject of this application is seeking to reinstate the former lawful use of the site for visitor accommodation for which both the Council and a Planning Inspector have previously sought to protect. From a review of the papers associated with the history of the site it would appear as though the reinstatement of serviced accommodation on the application site is therefore accepted as a matter of principle.

Application Ref: 08/0809

Description of Development: Use of premises as a single private dwellinghouse

Decision: Approved

Date of Decision: 3rd October 2008

3.7 It is understood that the decision to support this further application to change the use of the application site to a single dwelling related to the works required on site to upgrade it a guest house compliant with policy, and the changing character of the local area. Although the Council accepted that the adjoining property and adjacent properties were being retained as visitor accommodation.

4.0 Relevant Planning Policy and Legislation – National Planning Policy Framework

4.1 The development subject of this application needs to be assessed against the provisions of the development plan which comprises the Revised National Planning Policy Framework and the adopted Blackpool Local Plan. This section of the report will focus on the national planning policy position, with local policies addressed at Section 5.

Revised National Planning Policy (NPPF) July 2021

- 4.2 The Revised National Planning Policy Framework was last updated in July 2021, and sets out the Government's planning policies for England, and how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF is a material consideration in the decision-making process and a summary of paragraphs considered material to the determination of this application read as follows:

Section 2 - Achieving Sustainable Development

- 4.3 **"Paragraph 8:** Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective—to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
- 4.4 **"Paragraph 10:** So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development."
- 4.5 **"Paragraph 11:** Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; “

4.6 **“Paragraph 12:** The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”

Comment

4.7 The application site is sustainably located for the use proposed, with good access to key local services and facilities, including public transport links. The development will be sited within an area characterised by a mix of residential uses and visitor accommodation and is located within the defined settlement boundary for Blackpool. In short, the site is deemed to be in a sustainable location, represents the effective use of a previously developed site, and is for a use which is deemed to be both acceptable and appropriate.

Section 4 - Decision Making

4.8 In relation to decision-making the NPPF states:

4.9 **“Paragraph 38:** Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

4.10 **“Paragraph 47:** Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

Comment

- 4.11 The proposed development represents an effective and efficient use of land within the urban area and is therefore deemed to be acceptable. The application is also supported with the required documentation to demonstrate the suitability of the development in its setting, and in relation to its impact on neighbouring amenity, the historic environment and the street scene. It is therefore our view that the development proposed is compliant with the provisions of the Development Plan when read as a whole, and we would therefore kindly request that planning consent be granted.

Section 6 – Building a Strong, Competitive Economy

- 4.12 Given that this application proposes the provision of new additional visitor accommodation, attention is drawn to the following paragraphs:
- 4.13 **“Paragraph 81:** Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”
- 4.14 **“Paragraph 83:** Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

Comment

- 4.15 This proposal seeks to secure the creation of a viable luxury serviced accommodation use of the application site. This will assist in supporting economic gain in the local area through the business operating the site and the supply chain requirement to service the use. In assessing the proposals subject of this application, we would ask that due regard be paid to the suitability of the application site and the locational need to be sited close to the

Promenade and the wider services and public transport connections within Blackpool. In short, however this proposal will result in benefit to the local economy with resultant harm on neighbour amenity.

Section 8 - Promoting Healthy and Safe Communities

4.16 **“Paragraph 92:** Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

4.17 **“Paragraph 93:** To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”

Comment

- 4.18 This development is proposed to be situated in a suitable and sustainable location. Furthermore, the development has been designed to enhance interaction between the proposed residents and neighbouring properties, and will ensure safe and overlooked external spaces to the property frontage, side and rear whilst protecting amenity and privacy. The site is well located for access to local services and is therefore deemed to meet the tests laid out within section 8 of the NPPF.

Section 9 - Promoting Sustainable Transport

- 4.19 Given the nature of the proposed use, due regard is drawn to the following paragraphs of the NPPF:

- 4.20 **“Paragraph 110:** In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

- 4.21 **“Paragraph 111:** Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

- 4.22 **“Paragraph 112:** Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

Comment

4.23 As set out within earlier sections of this statement, the site is well located for access to public transport links and the main highway network and wider public parking facilities. As such, we are of the view that the site is sustainably located and can provide safe and suitable access for the proposed development. The level of additional traffic to be created by the proposed development is in reality likely to be de minimus, if not comparable with the existing lawful use of the site, and will not therefore result in an increased risk to highway safety, nor increase congestion in the local area. For the reasons laid out elsewhere, the level of car parking proposed to service the development is also deemed to be sufficient to meet the needs of the proposed residents, without comprising highway safety or creating congestion in the local area, given the proximity of additional on street and public car parking provision within walking distance of the site.

Section 11 - Making Effective Use of Land

4.24 The application site currently comprises a single dwelling with associated access, garden space and landscaping. In this regard, attention is drawn to paragraph 119 of the Framework which reads as follows:

4.25 **“Paragraph 119:** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

Comment

- 4.26 The proposal represents an effective and efficient use of land, but not to a scale as to warrant concerns on overdevelopment given that sufficient land is being retained for access, car parking, landscaping and outdoor amenity spaces. Furthermore, the scheme actually comprises a reduction in the number of bedrooms within the property, which will in effect operate much the same as a family home, further reducing the potential number of users within the property, but to a scale which actually enhances residential amenity of the proposed occupiers. The development will also not result in detrimental impacts to neighbouring properties by way of overlooking, loss of daylight, overbearing effects etc. The NPPF is clear therefore in its support for such development, and in this regard we would kindly request that planning permission be granted for this scheme.

Section 12 - Achieving Well-Designed Places

- 4.27 The importance of good design is addressed at paragraph 126 which states that:
- 4.28 **“Paragraph 126:** Advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

Comment

- 4.29 The development comprises the provision of a well designed development within the defined settlement boundary, and within a sustainable location. The proposed development has been designed taking account of the character and appearance of the existing property, the local area, and is deemed to be of an acceptable scale, form, design and use of materials to justify the grant of consent, given the minor changes being proposed to the physical fabric of the building.

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.30 Whilst the site is not in an area at risk from flooding, the need to adapt development to meet the challenges of climate change will still need to be addressed. Attention is therefore drawn to the following paragraphs:
- 4.31 **“Paragraph 152:** The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”
- 4.32 **“Paragraph 154:** New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”

Comment

- 4.33 Given the extent and nature of build works being proposed within this change of use scheme, it is clear that the proposal will result in enhancement and improvement of the energy performance of the existing building with enhanced insulation, sound proofing measures, and general upgrade of white goods and other internal fittings to improve the overall environmental performance of the site.

Section 16 – Conserving and Enhancing the Historic Environment

- 4.34 Given that the application property falls within a designated Conservation Area, and there are listed buildings within close proximity, the following provisions of section 16 of the NPPF have been addressed:

- 4.35 **“Paragraph 194:** In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”
- 4.36 **“Paragraph 202:** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

Comment

- 4.37 The site itself is located within the North Promenade Conservation Area and is adjacent to listed buildings. However, the nature of the proposed use of the site is commensurate in operation and impact to a standard single dwellinghouse (the existing lawful use of the site) and is not therefore anticipated to result in any harm to residential amenity or additional impact on the character of the local area. Furthermore, the extent and proposed external changes to the property are very limited in nature and will in fact result in enhancement. There is not therefore any perceived harm from the proposed development to the historic environment, and the scheme in that regard is considered to be acceptable.

Summary

- 4.38 It is clear for the reasons set out above that the development proposed is in accordance with the paragraphs and requirements of the National Planning Policy Framework. Therefore, in line with the provisions of paragraph 11 of the Framework, we would kindly request that the Council grant consent for this proposed change of use without delay.

5.0 Relevant Planning Policy – Blackpool Local Plan

5.1 The Blackpool Development Plan currently comprises the Blackpool Local Plan Part 1 – Core Strategy adopted January 2016, the saved policies of the Blackpool Local Plan (Adopted 2006) and a number of adopted Supplementary Planning Documents.

5.2 As shown on the Proposals Map extract included below, the site subject of this application is understood to be located within the identified settlement of Blackpool, within the Inner Area, with the Gynn Square Resort Neighbourhood and is noted to be located within the North Promenade Conservation Area.



5.3 Included below is a list of the key determinative local plan policies of relevance to the determination of this application:

Blackpool Core Strategy

- Policy CS1 – Strategic Location of Development;
- Policy CS5 - Connectivity;
- Policy CS7 – Quality of Design;
- Policy CS8 – Heritage;
- Policy CS12 – Sustainable Neighbourhoods;
- Policy CS21 – Leisure and Business Tourism; and

- Policy CS23 – Managing Holiday Bed Spaces

5.4 Given the nature of the use proposed within this application, specific attention is drawn to the provisions of policies CS21 and CS23:

5.5 **“Policy CS21 – Leisure and Business Tourism**

1. In order to physically and economically regenerate Blackpool’s resort core and town centre, the focus will be on strengthening the resort’s appeal to attract new audiences year round. This will be achieved by supporting:
 - a. Proposals for new high quality tourism attractions focused on the town centre and resort core, including major development opportunities which have the potential to become wider catalysts for regeneration to improve the visitor experience
 - b. Proposals for new visitor accommodation focused on the town centre, resort core and defined holiday accommodation areas, unless exceptional circumstances justify a peripheral location outside these areas
 - c. The improvement and enhancement of important existing tourist attractions
 - d. The improvement of existing holiday accommodation and giving marginal, lower quality guesthouses the opportunity to convert to high quality residential accommodation outside the defined holiday accommodation areas.
 - e. New development along the promenade’s built frontage which complements the high quality public realm investment along the promenade to enhance the appearance of Blackpool’s seafront
 - f. The enhancement of existing and promotion of new venues and events spaces which can accommodate a year round programme of events, festivals and conferences.
2. Elsewhere, outside the resort core and town centre, the Council will support new tourism investment that is predominantly focused on existing outdoor leisure and recreation facilities which strengthens the wider resort offer and does not undermine resort regeneration.”

5.6 **“Policy CS23 – Managing Holiday Bed Spaces**

To achieve an economically viable level of quality holiday accommodation, the following approach will be adopted to manage a reduction in the oversupply of poor quality holiday bed-spaces:

1. Within the main holiday accommodation areas defined in the SPD: a. Existing holiday accommodation use will be safeguarded and new or refurbished holiday accommodation will be supported b. Change of use from holiday accommodation, or the loss of sites used, or last used, as holiday accommodation, will be resisted unless:
 - i. Exceptional circumstances are demonstrated in accordance with the SPD, or
 - ii. In relation to a promenade frontage, the proposal would provide high quality holiday accommodation alongside a supporting new residential offer. Such proposals would need to comply with the requirements of the SPD.
2. Outside the main holiday accommodation areas:
 - a. Where existing holiday accommodation is viable its retention will be supported, including measures to improve the quality of accommodation
 - b. Change of use from holiday accommodation to permanent residential use will be permitted where proposals provide high quality homes which comply with the Council’s standards for conversions or new build, and relate well in use, scale and appearance to neighbouring properties.
3. Within the key promenade hotel frontages defined in the SPD, holiday accommodation use will be safeguarded and appropriate measures to enhance the character and appearance of existing hotel buildings and frontages will be supported, to help sustain the long term future of the resort.”

Saved Policies of the Blackpool Local Plan (2006)

5.7 From the information available on the Blackpool Council website, the saved policies deemed to be of relevance to the determination of this application, include:

- Policy LQ1 – Lifting the Quality of Design;
- Policy LQ2 – Site Context;
- Policy LQ10 – Conservation Areas;
- Policy LQ14 – Extensions and Alterations;

- Policy BH3 – Residential and Visitor Amenity;
- Policy AS1 – General Development Requirements

5.8 From the list of Local Plan policies as detailed above, specific attention is drawn to the following:

“BH3 Residential and Visitor Amenity

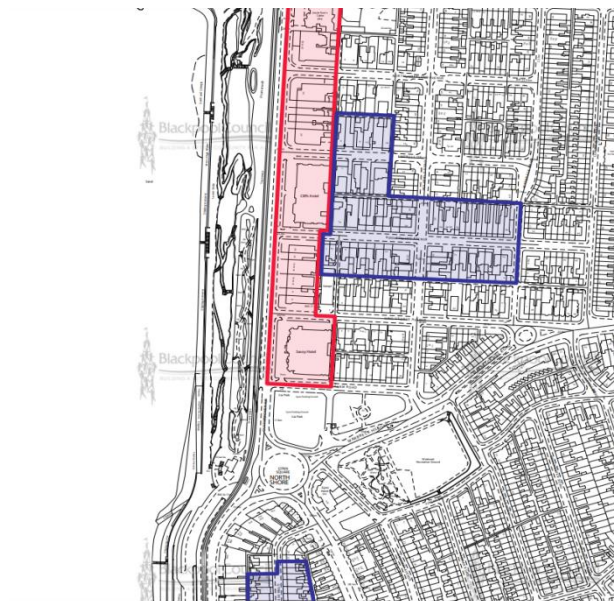
- (A) Developments will not be permitted which would adversely affect the amenity of those occupying residential and visitor accommodation by:
- (i) the scale, design and siting of the proposed development and its effects on privacy, outlook, and levels of sunlight and daylight; and/or
 - (ii) the use of and activity associated with the proposed development; or by
 - (iii) the use of and activity associated with existing properties in the vicinity of the accommodation proposed.
- (B) residential units will need to provide a rear or side garden, or other area of outdoor private amenity space, of sufficient size to meet the needs of their occupiers. Exceptionally flat developments without private amenity space will be acceptable where:
- (i) the characteristics of the site and/or surrounding built form preclude the provision of private amenity space;
 - (ii) the development is in a highly accessible location;
 - (iii) the development would have wider regeneration benefits or would re-use vacant space above commercial premises in shopping centres; and
 - (iv) adequate provision is made for the storage of refuse and materials for recycling.

Supplementary Planning Documents

5.9 In the preparation of this detailed planning application due regard has also been paid to the provisions and requirements of the following adopted Supplementary Planning Documents:

- Holiday Accommodation SPD (2017); and
- Access and Parking SPG (2005)

5.8 From a review of the Holiday Accommodation SPD it is noted from the Plan extract included below, that the application site is on the edge of the defined Promenade Key Hotel Frontage, and close to other Main Holiday Accommodation Areas. Given the proximity of the site to these accommodation designations, and the use and character of other properties within close proximity to the site, the proposed use is deemed to be acceptable in this location, and will in fact be reinstating a previous use of the site for visitor accommodation.



Emerging Local Plan

- 5.9 It is understood that Blackpool Council submitted the emerging Local Plan Part 2 to the Planning Inspectorate for Examination. It is further understood that the Examination Hearings have now concluded.
- 5.10 The site subject of this application is noted to be proposed to remain within the Inner Area, and within the designated conservation area, and the development subject of this application will not therefore undermine the provisions of the emerging plan.
- 5.11 Given that the emerging Local Plan is still awaiting Independent Examination, and therefore the weight to be attached to the relevant policies within the document is limited, it is not proposed to address the emerging Local Plan policies in any further detail at this stage; albeit it is clear that approval of this application will not undermine the principles

and delivery of the emerging draft document.

Development Plan Summary

- 5.12 For the reasons set out above, it is our view that the development subject of this application represents an acceptable and appropriate form of development. The scheme will secure re- instatement of the former visitor accommodation use on site, but with a higher quality offer of visitor accommodation to attract a different sector of the market. The nature and scale of use will be commensurate with both the approved use of the site, and the use of adjacent properties and the character of the area. The site is well located for visitors to have access to local attractions, the Promenade and public transport links into Blackpool Town Centre.
- 5.13 The site is previously-developed and through careful design, can demonstrate that the scheme will not result in detrimental impacts on the character and appearance of the local area, the conservation area, nor on the amenity of neighbouring residents. As set out below, there are also a number of other material considerations which also weigh in favour of the grant of consent. Therefore, for the reasons laid out above, it is clear that the development subject of this application is compliant with the provisions of the Development Plan when read as a whole. The scheme is therefore deemed to be acceptable as a matter of principle, and we look forward to working with the Council on a timely positive determination of the application.

6.0 Material Considerations

- 6.1 Section 70(2) of the 1990 Act requires that the authority, in dealing with the application, shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. It has been demonstrated above that the proposed development is in accordance with the relevant Development Plan, including national and local plan policy. In addition to this, material considerations exist that weigh further in favour of the development, including:

Sustainable Development

- 6.2 The scheme as submitted represents a sustainable form of development given its re-use of a previously developed site within a built-up area. The application site is well located

for access to public transport and other key local services and facilities. Furthermore, the development will result in job creation during the construction phase, and additional spend in the local area once the use is operational. The proposal has been designed to ensure the protection of the privacy and amenity of neighbouring residents, the amenities of the proposed users of the new serviced accommodation, and the visual amenities of the street scene. The development will support social interaction and has been designed to respect the character of the local area and the wider Conservation Area.

Visitor Accommodation

- 6.3 The quality and proposed layout of the proposed serviced accommodation can be seen to be seeking to meet the needs of a specific sector of the tourism/visitor market, and will assist in the enhancement and regeneration of the immediate local area, and the aspirations to enhance the quality of visitor accommodation within the wider resort.

Planning History

- 6.4 As set out clearly within section 2 of this report, the property has historically been in use as a hotel prior to securing change of use consent in 2008 for the creation of a single dwelling. The fact that this scheme will be seeking the reinstatement of this former use is deemed to be material to the determination of this application.

Character of the Area

- 6.5 Whilst the application site is not within a defined holiday accommodation area, it is immediately adjacent to the Promenade Holiday Area and is within a wider locality where hotels and guest house accommodation is available. Furthermore, as set out above the proposal is simply seeking to reinstate the former use of the property. The proposal will not undermine or harm the character of the local area and will in fact represent a change of use consistent with the properties adjoining the application site.

Climate Change

- 6.6 The redevelopment proposals set out within this application will secure the upgrade and improvement of the existing property. This will enhance the energy performance of the site, and assist the Council in securing development which helps to reduce the impact of climate change.

6.7 As such, whilst we remain of the view that the development is compliant with the policies, provisions and principles of the Development Plan when read as a whole, there are also a number of clear material benefits to the grant of consent which also tip the balance in favour of the development as submitted. We therefore kindly request that this application be approved without delay.

7.0 Conclusions

7.1 It has been demonstrated throughout this submission that the development subject of this application, accords with the relevant statutory duties and the Development Plan when read as a whole. The proposed development is acceptable in principle, by virtue of the provisions of the National Planning Policy Framework and the Blackpool Local Plan. Furthermore, numerous other material considerations weigh in favour of the grant of consent, and these have been dealt with in detail above.

7.2 Section 70(2) of the Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where an application accords with the relevant Development Plan and material considerations are in favour, applications should be determined positively. As such, based on the above principles, we would therefore kindly request that the Council seek to support this proposal and issue a grant of consent for this application without delay.

7.3 Should you require any further information in advance of validation of the application, or during the determination process, please do not hesitate to contact us. Otherwise, we look forward to hearing from you shortly with confirmation of the officer appointed to deal with our application, and details of the application reference number and target determination date.