



Appeal Decision

Site visit made on 23 July 2025

by **S Brook BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 2 September 2025

Appeal Ref: APP/J2373/W/25/3362809

18 Coop Street, Blackpool, FY1 5AJ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mrs L Murdoch against the decision of Blackpool Council.
 - The application reference is 23/0816.
 - The development proposed is Change of use from a 10 bed hotel with owner's accommodation to 6 self-contained holiday suites.
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Decision

1. The appeal is allowed and planning permission is granted for the change of use from 10 bed hotel with owner's accommodation to 6 self-contained holiday suites at 18 Coop Street, Blackpool, FY1 5AJ, in accordance with the terms of the application, reference 23/0816, and the plans submitted with it, subject to the conditions in the attached schedule.

Preliminary Matters

2. The change to 6 self-contained holiday suites has been undertaken. Nevertheless, I have dealt with the appeal based on the submitted plans.

Main Issues

3. The Council's third reason for refusal identifies a lack of provision of green infrastructure on site and no mechanism to secure a financial contribution for the provision of off-site tree planting, identifying conflict with policy CS6 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 (January 2016), (LPP1), and policy DM35 of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies February 2023, (LPP2).
4. However, the Council confirms that following the adoption of a revised Greening Blackpool Supplementary Planning Document in March 2025, (GB SPD) tree planting contributions are no longer required for this type of proposal, and so, no further case is made by the Council in relation to this third refusal reason. It is mandatory for me to take account of the most relevant and up to date information in reaching a decision and the revised GB SPD indicates that a requirement for new tree planting provision in new residential development excludes changes of use. As such, I have no reason to disagree with the Council's latest position, and I have not considered this matter further.
5. Consequently, the main issues in this appeal are (a) whether the proposal would provide a satisfactory standard of holiday accommodation for future occupiers, with particular regard to mix, internal and external space, and privacy, and (b) the

effect of the development on the living conditions of occupiers of neighbouring properties, with particular regard to noise and disturbance.

Reasons

Standard of holiday accommodation

6. The plans provided indicate that the former hotel provided 10 bedrooms over the two upper floors, some of which shared bathroom facilities, with a shared lounge/bar, dining room, and kitchen at ground floor, with access to a narrow rear yard from the lounge. The proposal provides two self-contained suites to each floor. The rear yard would remain unaltered, accessed only by occupiers of the two ground floor suites.
7. There is no dispute between the main parties that each suite would be afforded adequate natural light. The arrangement of these terraced properties along Coop Street, particularly the rear projections that have windows facing onto similar projections within neighbouring properties, gives rise to mutual overlooking and a restricted outlook. However, guests of the former hotel would have had a similar experience. Albeit a boundary wall will comprise part of the outlook from the rear ground floor suite, its height in relation to internal floor levels would not be overly dominant, so as to restrict outlook unacceptably.
8. While there is the potential for occupiers of the front ground floor suite, who have access to the rear yard, to impact on the privacy of occupiers of the rear ground floor suite, any loss of privacy would not be significant, given the existing level of overlooking possible from neighbouring windows. Further, this outdoor space is limited in size and so it is unlikely to attract visitors for any extended period of time.
9. The proposed plans indicate that each suite would provide 1 bedroom accommodation for 2 people. Gross internal area (GIA) measurements for the 6 suites range from 25.7 sqm to 48.7 sqm. Each suite contains a double bed with ensuite shower facilities, as well as a kitchenette and seating area. For two people, utilising this accommodation on a short-term transient basis for holiday or other visitor purposes, the internal floor space, layout and facilities provided are reasonably sized and functional. With the imposition of an appropriate condition restricting the occupancy level of the accommodation to that proposed on the plans, the overall size and functionality of the holiday suites would provide satisfactory short-term accommodation for future occupiers. The removal of shared bathroom facilities is an improvement in the standard of visitor accommodation, over the former hotel.
10. The proposal does not meet the internal space standards provided by the Technical housing standards – nationally described space standard, 27 March 2015, (NDSS), which deals with internal space for new dwellings, providing floor areas and dimensions for key parts of a home. Reference is also made to the Council's New Homes from Old Places Residential Conversion and Sub-Division Supplementary Planning Document, March 2011, (NH SPD), albeit the supporting text to LPP1 policy CS13 indicates that the space standards of the latter are replaced by those of the NDSS. Furthermore, the NH SPD states that the key requirements contained therein (Part 2) relate to conversion and sub-division of properties into *permanent* residential use (emphasis added). This proposal is for holiday accommodation, and so the requirements of future occupiers would differ from those seeking permanent homes. Given my conclusions above on the

standard of accommodation provided in this case, a lack of compliance with these space standards does not draw me away from my earlier findings that the proposal provides a satisfactory standard of holiday accommodation for future occupiers.

11. No meaningful outdoor amenity space would be available for users of these holiday suites, however, the level of provision would be no different to that afforded to guests of the former hotel. It is reasonable to expect that holidaymakers would spend most of their time out of doors, visiting the attractions of the area. As such, while I have had regard to the requirement of the NH SPD relating to the removal of extensions where it is necessary to improve the standard of outdoor amenity space, it has not been justified in the circumstances of this case.
12. The Council raises concerns with the mix of accommodation proposed. LPP1 policy CS13 seeks to ensure that in all new flat development, at least 70% of flat accommodation should be 2 bedrooms or more. The appeal scheme would not meet this requirement. However, this policy and supporting text considers the need to manage the overall housing stock of the area, in order to meet the future needs of residents in a manner that encourages sustainable communities. The supporting text points in particular, to a high concentration of small flats and bedsits occupied by single person and lone-parent households, resulting from the conversion of former holiday accommodation. As this proposal provides specifically for holiday accommodation for visitors, not permanent residents, within a suitable location - the Resort Core, the available evidence does not lead me to conclude that the proposal would exacerbate those issues identified within LPP1 policy CS13.
13. To conclude, the proposal would provide a satisfactory standard of holiday accommodation for future occupiers, with particular regard to mix, internal and external space, and privacy. Consequently, I find no conflict with LPP1 policies CS7, CS12, CS13, CS21 and CS23, or LPP2 policy DM5, which collectively and amongst other matters, seek to provide a suitable mix and standard of development, which is of an appropriate density and ensures the amenities of potential occupiers are not adversely affected, supporting good quality holiday accommodation in the Resort Core.
14. While the Council's decision notice references LPP2 policy DM41, this policy establishes highway, transport and parking requirements and I have not found it determinative in relation to this main issue.

Noise and Disturbance

15. There is dispute between the main parties as to whether the proposal requires a noise assessment, which would then inform any necessary noise mitigation, to ensure satisfactory living conditions for occupiers of neighbouring properties, albeit the Council does accept that this could be secured through the imposition of a suitable planning condition. It is understood that the adjoining premises at 16 Coop Street, are in permanent residential use.
16. While the proposal would see a change from a 10-bedroom hotel to 6 self-contained holiday suites, it would nevertheless remain in use as a commercial premises providing holiday accommodation, albeit there would be no on-site management. Given the limited size of each unit and the functionality of the space provided, there is little substantive evidence before me to suggest that these self-contained holiday suites would generate a significantly higher level of noise or disturbance than that associated with the former use. The proposed suites are

designed for occupation by up to two people only and a condition can be imposed to secure this, as suggested by the Council. The level of communal space within each unit would be small and it would not afford people the opportunity to gather in large numbers. Consequently, the available evidence does not suggest that the proposal would give rise to any significant increase in noise or disturbance over and above the former use. Nor have I been provided with any evidence to suggest that the former use resulted in any noise or disturbance issues. As such, the need for a noise assessment has not been robustly demonstrated.

17. A management plan has been provided which indicates that the premises will be managed by off-site management agents with a 24-hour emergency contact. This would be made available to guests and to occupiers of neighbouring properties, by being displayed externally to the premises. In the event that occupiers of the development did cause any disturbance, this 24 hour emergency contact would provide other guests and neighbouring residents with a means to have this resolved. This can be secured by the imposition of a suitable condition.
18. To conclude, the circumstances of this case do not demonstrate that a noise assessment is necessary. Subject to the imposition of conditions to secure occupancy levels and the management of the appeal site in line with the submitted management plan, the development will not harm the living conditions of occupiers of neighbouring properties, with particular regard to noise and disturbance. As such, I find no conflict with LPP1 policy CS7 and LPP2 policy DM36, which seek to ensure that new development is compatible with existing uses and does not result in adverse effects on amenity.

Other Matters

19. The Council indicates that it has experienced high levels of unauthorised use of holiday accommodation as permanent, sub-standard residential accommodation, which has contributed to extreme levels of deprivation and social challenges, and difficulties enforcing against such unlawful use. In this regard, the Council highlights the importance of future proofing development, in order to ensure adaptability and reduce waste. While I recognise the benefits of such an approach, I have no reason to suspect that the appeal property would be used other than as holiday accommodation and I must determine the appeal on the basis applied for.
20. The Council has referenced a government consultation on the potential introduction of a new use class C5 for short term holiday lets, and a possible permitted development to change from use class C3 to C5 and vice versa, as further justification for pursuing a different mix and standard of development. However, it is unclear at this point in time, whether these proposals will progress and what form they will ultimately take. I am required to determine this appeal based on the current circumstances.
21. The appeal property is situated in the Foxhall Conservation Area (CA). I have had regard to the statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the CA. No external alterations are proposed which would affect the appearance of the building and as the local area contains a mix of holiday accommodation and permanent residential homes, I am satisfied the proposal would not materially impact on the character of the area. The character and appearance of the CA would therefore be preserved.

Conditions

22. I have considered the conditions suggested by the Council with reference to the National Planning Policy Framework and the Planning Practice Guidance. I have made some amendments, in the interests of precision and clarity. The standard time limit is not necessary, however, a condition listing the plans is necessary in the interest of certainty.
23. In addition to those conditions discussed above relating to occupancy levels and the management plan, a condition is imposed restricting the use of the suites as visitor accommodation only, as this is the basis on which the application has been considered acceptable in terms of the standard of accommodation provided. Although the Council's suggested condition sought to limit use to only those on holiday, this would restrict other users, such as those visiting in relation to their work. Such a specific reference has not been justified and the inclusion of a time limit of 30 days is sufficient to ensure that the appeal development is used only for short term accommodation.
24. Arrangements for the collection of waste are contained within the management plan and so a further condition relating to the storage of bins forward of the front elevation is not justified.

Conclusion

25. For the reasons set out above, having had regard to the development plan as a whole and all other material considerations, I conclude that the appeal should be allowed.

S Brook

INSPECTOR

Schedule of Conditions

- 1) The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan 23040_LOC, Proposed Plans 23040_110.
- 2) The use hereby approved shall at all times operate in full accordance with the submitted Management Plan prepared by Lisa Murdoch, dated 17th October 2024. A board displaying management contact details for the property shall be displayed in accordance with the submitted Management Plan. This board shall thereafter be retained and maintained for so long as the use hereby approved is operational.
- 3) The development hereby permitted shall not at any time exceed the following number of bedspaces, other than where infants are sleeping in travel cots: Flat 1 – 2 bedspaces, Flat 2 – 2 bedspaces, Flat 3 – 2 bedspaces, Flat 4 – 2 bedspaces, Flat 5 - 2 bedspaces, Flat 6 – 2 bedspaces.
- 4) Each holiday suite hereby permitted shall be used as visitor accommodation only and shall not be occupied by any person(s) as their sole or main place of residence. No person(s) shall occupy any suite for a period exceeding 30 days.