
Appeal Decision

Site visit made on 23 September 2025

by **F Rafiq BSc (Hons) MCD MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 2nd October 2025

Appeal Ref: APP/J2373/W/25/3368729

18 Derby Road, Blackpool, FY1 2JF

- 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 Secluhome Investments Ltd against the decision of Blackpool Council.
 - The application Ref is 24/0613.
 - The development proposed is the subdivision of existing ground floor flat to form additional flat, including use of basement (retrospective application to increase the number of flats in the building from 7 to 8).
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Decision

1. The appeal is dismissed.

Preliminary Matter

2. At the time of my site visit the ground floor and basement flats were complete and furnished and reflected the plans before me. For clarity, I have dealt with the appeal based on the submitted plans.

Main Issues

3. The main issues are (i) whether the proposed development provides satisfactory living conditions for its occupiers with regards to internal space standards, light and outlook, and (ii) the effect of the proposed development on the mix and balance of residential accommodation in the area.

Reasons

Living conditions

4. The appeal property is a mid-terrace building that contained seven flats. The development subject of this appeal has sub-divided the ground floor flat, which along with the use of the basement, has resulted in the formation of two flats.
5. The proposed ground floor flat¹ has been reduced in floor area to around 40.5sqm. This fails to meet the 50sqm minimum total internal floorspace standard set out in the Technical housing standards – nationally described space standards (NDSS) for a 1 bedroom 2 person flat. The other flat² which has been created across the rear of the ground floor and the basement, whilst compliant with the total internal floorspace standard, has failed to provide an adequately sized kitchen/dining/living room.

¹ Flat 1

² Flat 2

6. Although some of the shortfalls are small, such as the bedroom on the ground floor flat which is 0.5sqm under the required standard, the other identified floorspace shortcomings are significant and have resulted in poor quality accommodation for the occupants of the flats. The need for compliance with the NDSS is questioned by the Appellant, but the development plan at Policy DM5 of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (Local Plan Part 2) sets out that residential conversions and sub-divisions need to satisfy the NDSS.
7. The bedroom in the basement is served by two small high-level windows and a partially glazed door. Although these provide some natural light and ventilation, from my observations, the size and high-level position of the glazed openings has resulted in a dark and gloomy internal environment with occupants having a limited outlook.
8. I do not doubt that the appellant has sought to deliver a high-quality internal finish, but this does not overcome the harm that I have identified in relation to the inadequate floorspace or the poor living conditions in the basement bedroom.
9. I therefore conclude that the development proposed does not provide satisfactory accommodation for its future occupiers, having regard to internal space standards, light or outlook. Accordingly, it conflicts with Policies CS12 and CS13 of the Blackpool Local Plan Part 1: Core Strategy (2012-2027) (Core Strategy) and Local Plan Part 2 Policy DM5, which seek, amongst other matters, to provide quality living accommodation which meet relevant standards. It also conflicts with Paragraph 135 of the National Planning Policy Framework (Framework), which seeks, amongst other matters, a high standard of amenity for existing and future users.

Mix and balance of residential accommodation

10. Core Strategy Policy CS13 requires new residential development to provide an appropriate mix of quality homes which help to rebalance Blackpool's housing supply and support sustainable communities, as well as not permitting new flat development which would further intensify existing over-concentrations of such accommodation. Local Plan Policy DM5 in the Inner Area, similarly resists proposals for the sub-division and/or change of use of existing buildings for residential use where it would further intensify such over-concentrations of flats.
11. The evidence before me is clear that there is a significant oversupply of small flats in this area of Blackpool. Although the appeal proposal has only resulted in one net additional flat, it has increased the concentration of flatted development which has further unbalanced the housing mix in the area and consequently, failed to support the aim of creating sustainable communities.
12. I therefore conclude that the appeal development has had a harmful effect on the mix and balance of residential accommodation in the area. As such, it is contrary to Core Strategy Policies CS12 and CS13 and Local Plan Policy DM5, which seek, amongst other matters, to prevent the further over-concentration of flats.

Other Matters

13. The appellant has set out that the appeal proposal has sought to make efficient use of an under-utilised space. Whilst this receives support from the Framework at Paragraph 124 that seeks to promote effective use of land, this paragraph also

seeks to ensure safe and healthy living conditions. The appeal development is acceptable in terms of external amenity space. This is however a neutral matter and not one which weighs in its favour.

14. The provision of additional accommodation in a location that is accessible to shops, services and public transport, and which could serve sectors such as seasonal workers weighs in its favour.
15. Reference has been made to other appeal decisions, but I am not aware of the full circumstances of those cases. From the limited information provided, one of the cases³ involved a shortfall in the size of the flat by 1sqm, unlike one of the flats in this appeal proposal, which is substandard by around 9.5sqm. Another one of the referenced cases⁴, also differed from this appeal scheme in that the basement accommodation was found to be acceptable in terms of outlook and light levels. These referenced appeal decisions are not therefore comparable to the case before me.

Planning Balance and Conclusion

16. The modest contribution the net additional flat makes to housing supply in an accessible location attracts moderate weight.
17. However, the proposal in terms of the mix and balance of residential accommodation has exacerbated the over-concentration of flats in the area. It has also had an unacceptable harmful impact on the living conditions of its occupiers. These harms will be long lasting and would be contrary to the objectives of the Framework. I ascribe these substantial weight and as such, the benefits do not outweigh the harm identified.
18. The proposal conflicts with the development plan and the material considerations do not indicate that the appeal should be decided other than in accordance with it. For the reasons given above, I conclude that the appeal should be dismissed.

F Rafiq

INSPECTOR

³ APP/Q0505/W/20/3256246

⁴ APP/R5510/W/19/3231871