

BRIDLINGTON TOWN CENTRE AREA ACTION PLAN

Report of Consultation on the Second Preferred Options Draft AAP,
Supplementary Planning Document and Sustainability Appraisal

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Report of Consultation on the Bridlington Town Centre Area Action Plan

This report presents the results of consultation on the Second Preferred Options Draft Bridlington Town Centre Area Action Plan, Draft Town Centre and Marina Supplementary Planning Document and AAP Sustainability Appraisal, which was held between August and October 2009.

The report lists all 55 representations made. For each entry the complete representation is provided, followed by the Council's response and recommendation for taking the comment into account in the Publication Area Action Plan.

Respondent	Type	Full Representation	Response & Recommendation
Asda Stores Ltd	AAP	<p>It is clear that substantial work that has been undertaken in order to produce this current draft of the Area Action Plan ("AAP") and its associated plans and documents. Asda's comments relate to the AAP's overall strategy to regenerate the town centre and wider area rather than on specific policies at this stage.</p> <p>Background</p> <p>One of the key documents that has been used to inform the development of the AAP has been the 2006 Bridlington Area Action Plan Retail Study undertaken by Roger Tym & Partners. The principal aim of this study was to assess the reasons why Bridlington Town Centre is less competitive than it needs to be in capturing the retail spending of local residents. The study made recommendations of future floorspace capacity for both comparison and convenience goods up to 2016. Recently this has been complemented by a borough-wide retail study, produced by England and Lyle and published in March 2009, which further assess capacity for additional convenience and comparison goods in the town up to 2026. Both studies generally make the same assumptions about Bridlington. That is:</p> <ul style="list-style-type: none"> • In order to compete effectively with neighbouring retail centres, the town needs to substantially increase its comparison retail offer, particularly with reference to traditional high street goods such as fashion and footwear. • There is some, albeit limited, scope for additional for convenience goods, even assuming that in time Bridlington is able to retain a greater proportion of convenience expenditure generated locally. <p>In terms of convenience goods, using a sales density that reflects large superstore operators, the 2006 retail study estimates convenience capacity by 2016 to be 1,244 sq m net sales assuming a modest rise in retention rates, whilst the 2009 study assesses convenience capacity to be £23.8m by 2026 (equating to just under 2,000 sq m net sales using similar sales density assumptions).</p> <p>The draft AAP utilises the work undertaken by both studies but also takes into account the recent impact of the economic downturn and revised assumptions regarding population growth for the town. From this it projects that up to 2021 there is capacity for a further 1,250 sq m net sales of convenience floorspace if developed into a superstore format.</p> <p>Whilst this identified capacity would be unable to support a new large scale foodstore on its own, it would allow for an extension of an existing large foodstore or the relocation of a foodstore to another site. The AAP proposes the latter as part of its Burlington Parade plans, which aim to significantly</p>	<p>The Council thanks Asda for its interest in Bridlington and welcomes the support for the principle of an AAP to guide the regeneration of the town centre.</p> <p>The Council responds to the points made as follows:</p> <p>i) The Council is confident that the demand work it has commissioned from Roger Tym & Partners for Bridlington, and for the whole of the East Riding by England & Lyle is sound. Both studies were also updated in 2010. The original studies and the 2010 updates form part of the AAP's evidence base. The Council is equally confident that this evidence, coupled with the soft market testing that the Council has carried out, justifies the AAP's retail proposals and confirms their deliverability. .</p> <p>ii) The Council considers, for the reasons set out at each stage in the AAP's preparation, that it is justified in promoting the AAP in advance of its Core Strategy; and the Council notes that there are now many instances in which AAPs have been found sound at examination in advance of the completion of a local authority's Core Strategy. The strategic approach to Bridlington town centre had been driven by the policies for Principal Towns and meeting their regeneration needs in the RSS; by East Riding's Community Plan; and now by the Core Strategy which has reached Preferred Options stage. Bridlington is also the largest East Riding settlement, serves a wide catchment, has its own (with the much smaller Driffild settlement) travel to work area, and performs</p>

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		<p>enhance the overall retail offer and shopping experience within Bridlington. It is against this background that Asda makes its comments.</p> <p>General Comments</p> <p>Asda considers the AAP and its associated documents and plans under the headings below.</p> <p>(i) Overview</p> <p>Whilst Asda broadly welcomes the creation of an AAP for Bridlington Town Centre as a useful tool for guiding development and regeneration of the town over the plan period, it also has a number of concerns regarding the overall tone of the plan, its timetable for adoption and the subsequent deliverability of its vision.</p> <p>Planning Policy Statement 12 advises that Core Strategies should be examined in advance of other Development Plan Documents (DPDs), including Area Action Plans. An examination of the Council's adopted Local Development Scheme reveals that the Bridlington AAP is running approximately 12 months ahead of the Core Strategy. Whilst Asda does not debate the compelling need to address development of Bridlington Town Centre in the short to medium term, it has concerns that if adopted earlier than other LDF DPDs, the relevance of the AAP will diminish in the face of a more up to date Core Strategy and there is a danger that there will be significant inconsistencies between the two documents. In light of this Asda seeks reassurances that the future of the AAP will not be undermined as a result of the current LDF timescales.</p> <p>Asda notes that the AAP and accompanying plans and documentation in its current form are substantial and detailed, especially in comparison with other AAPs being produced in neighbouring Local Planning Authorities. Whilst the detail contained in the AAP provides the Council with comfort that any proposals emerging in Bridlington Town Centre will conform to the vision outlined in the document, Asda believes that the content of the plan is too rigid and overly prescriptive in its tone. This is particularly evident in the Major Projects section of the AAP and the accompanying Supplementary Planning Document (SDP). As an example the AAP makes specific reference to a 'relocated' foodstore which, it is clear from the AAP's content, signifies the redevelopment of the Tesco store at Station Approach and therefore seemingly excludes the specific interests of other foodstore operators such as Asda who are keen to invest in Bridlington. The SPD also makes very specific reference to materials and elevational treatments to any proposed developments that</p>	<p>less well as a local economy than any other in the district with the highest levels of multiple deprivation. The Council is also taking great care to ensure that the AAP does not drive the strategy of the East Riding Core Strategy, and that the AAP will be consistent with it and its evidence base.</p> <p>iii) The Council stresses that the purpose of the AAP is to deliver a specific strategy for the town centre's regeneration; that this strategy, including the detailed site allocations which form part of it, is justified by the evidence base; and that the options selected have also performed best against the Sustainability Appraisal objectives. The AAP delivery strategy provides for the flexibility needed, taking into account that the fact that the strategy is necessarily specific as to the measures – the site allocations, the developments promoted, the interventions proposed to correct the market failures and the gains in infrastructure – that are most likely, on the evidence, to be effective in achieving the strategy's objectives and delivering the improvements in outcomes sought.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>would arguably be best addressed at the planning application stage.</p> <p>The consequence of this is that the AAP affords little flexibility for any emerging proposals to be delivered. Flexibility is vital in the current climate of economic uncertainty in order to attract necessary investment and to ensure that companies are able to develop commercially viable schemes that are not tied to a planning framework that is too rigid. Asda would therefore like to see the AAP adopt an approach of more flexible planning framework, that on the one hand can reflect the Council's vision for the town centre as a vital and viable place where people can live, work and spend leisure time, but at the same time be adaptive to changing circumstances over the plan period.</p> <p>(ii) Assumptions Made in the Published Retail Studies</p> <p>As outlined above, the overall conclusions drawn by both retail studies are that there is notable capacity for additional comparison retail floorspace in Bridlington in the plan period, whilst convenience floorspace capacity over the same period is more limited.</p> <p>Although both retail studies utilised the latest assumptions for expenditure and turnover growth available at the time to calculate the quantitative capacity for this additional convenience floorspace, Asda believes the analysis of the current retail provision within Bridlington's catchment area and therefore the conclusions reached over capacity in the plan period are flawed. The reasoning behind this is the lack consideration about the trading performances of the two larger foodstores in the area (the Tesco at Station Approach and the Morrison's Store at Bessingby Road) in comparison to their benchmark turnover using company average sales densities. Indeed on a convenience turnover basis an analysis of the stores' benchmark turnover against the actual turnover of the stores derived from the household survey accompanying the 2009 retail study reveals that both stores are significantly overtrading:</p> <p>Tesco (Station Approach): Benchmark Convenience Turnover (based on company average sales densities) £16.33m Actual Convenience Turnover (based on household survey data) £29.95m</p> <p>Morrisons (Bessingby Road): Benchmark Convenience Turnover (based on company average sales densities) £19.74m Actual Convenience Turnover (based on household survey data) £30.95</p> <p>Both studies appear to give little or no weight to this overtrading and consequently in their capacity calculations assume that the overtrading will</p>	

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		<p>simply perpetuate over the plan period. The upshot of this is that both studies significantly underestimate the convenience capacity that exists within the Bridlington area.</p> <p>As a result of this we have undertaken our own theoretical capacity exercise, the details of which are appended to this letter. The exercise is based on the 3 zones within the 2006 study that are closest to Bridlington's main urban area (Zones 1, 2 and 3) and that predominantly use the shopping facilities in the town. We have used up to date statistics and growth assumptions provided by Experian to undertake the assessment. The assessment examines 3 scenarios. The first analyses capacity based on an 88% retention rate; this is the average retention rate across these 3 zones weighted in accordance with population sizes established from existing household survey information. The second scenario makes a more conservative assumption of an 80% retention rate, whilst a third scenario assumes a retention rate that would rise to 85% from 2011 onwards. Under all scenarios it is clear that the two published retail studies underestimate convenience and capacity and in fact enough capacity theoretically exists to support a new foodstore with a convenience net sales area of between 2,500 sq m and 3,000 sq m.</p> <p>In line with this identified capacity it is Asda's view that the Council need to undertake a review on how to best accommodate a new foodstore for the town, with not only with reference to the emerging AAP but assessed on the basis of providing a foodstore that best serves the wider population of the town. A new foodstore would also bring substantial qualitative benefits to the town such as increasing consumer choice and competition between retailers, both of which are key themes emphasised in emerging government guidance on retail planning (draft PPS 4 and Competition Test).</p> <p>(iii) Appropriateness of the Burlington Parade Proposals</p> <p>The AAP proposes areas of comprehensive redevelopment to provide the town with additional retail facilities. This is principally focussed on an area to the west of the town centre and, in line with the evidence base, concentrates on the provision of new comparison shopping facilities. The development around this area of the town centre has been termed Burlington Parade and the AAP proposes an enhanced 'retail circuit' around the town centre, the relocation of the Tesco store to the current coach park and plans for a series of comparison retail units (acting as a Second Retail Anchor) in the foodstore's place. In essence, this has the effect of expanding the current functional town centre to the west in order to accommodate additional comparison retail facilities.</p> <p>In Asda's view it is clear that along with the identified convenience capacity</p>	

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		<p>outlined in the Section (ii), there is capacity for additional comparison retail within the town's catchment area over the plan period, Asda nevertheless has concerns regarding the strategy being pursued to achieve this goal.</p> <p>The 1996 Local Plan for East Yorkshire defines a 'Shopping Area' for Bridlington, which includes land east and south east of Springfield Avenue but excludes the Railway Station, the Tesco at Station Approach and the coach park. The Shopping Area is centred around Chapel Street and the Promenade; an acknowledgement that this represents the greatest concentration of retail in Bridlington Town Centre.</p> <p>The effect of the AAP's proposal will be to move and disrupt an existing foodstore in order to provide additional comparison retail floorspace (in the form of the Second Retail Anchor); presumably for the reason that presently the existing Tesco store attracts the highest land value within the town. The upshot of this proposal however would be to create significant convenience and comparison retail floorspace outside the existing allocated Shopping Area, that would be peripheral to the existing retail core of the town centre and indeed even lie on the edge of the revised town centre boundary proposed in the AAP. It is Asda's opinion that this method of levering in additional comparison retail facilities in Bridlington is convoluted and even taking into account the neighbouring proposals in the AAP would result in the decline of the existing retail core as a result of the distance between it and the proposed Second Retail Anchor development. In Asda's view as it stands the retail proposals will do little to promote the overall vitality and viability of the town centre; rather it would simply redistribute footfall to the new retail anchors to the west and this would be to the detriment of the existing retail core and other areas of central Bridlington.</p> <p>Asda suggests that the Council revisits its plans for additional comparison retail floorspace and in line with Asda's previous comments, adopt a more flexible approach that can accommodate both additional convenience and comparison floorspace where it can best serve the population and without undermining the overall strategy for enhancing Bridlington Town Centre.</p> <p>Summary</p> <p>Asda broadly welcomes the creation of an AAP for Bridlington Town Centre and recognises its importance in providing a framework for the regeneration of the centre of the town, but believes that in order to maximise the benefits a number issues need to be addressed. These can be best summarised as:</p> <ul style="list-style-type: none"> • Affording a greater amount of flexibility within the plan, allowing it to 	

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		<p>become more adaptable to the current economic downturn and to be more responsive over the plan period;</p> <ul style="list-style-type: none"> • Revisiting the evidence base as this underestimates the capacity for additional convenience goods floorspace within the plan period. When recalculated this would provide enough capacity for a new large scale foodstore in the town. A strategy for accommodating this capacity needs to be formulated. • Revaluating the approach to providing additional comparison goods floorspace in the town centre. <p>We trust that these comments will be taken into account when drafting a more finalised version of the AAP.</p>	
B Kershaw	AAP	<p>My wife and I recently attended the public exhibition, of the redevelopment of the town centre in Bridlington, in the Spa on the 19th August. We found the plans both inventive and exciting for the town. The opening up of the Gypsy Race, we think, would be excellent and would bring back a hidden gem to the town (would it be possible to build one of the footbridges like the Japanese footbridge that is featured in several paintings by Monet?). We think that not only will the development bring Bridlington into the twenty-first century but will also give back something that has been lost to bad architectural design and fuddled thinking. Although we have lived in Bridlington less than two years we have grown to like and dislike certain aspects of the town. Some of the buildings simply look as though a good paint job and new windows and doors would be all that was needed to make certain streets look far better. The main arterial roads into Brid for the most part are pleasant enough but as well as redeveloping the town centre these, where lacking, could be brought up to a better standard, also the main arterial route signs indicating ones arrival in Bridlington could be given greater prominence or replaced?</p> <p>Would it be possible to make some kind of sculpture trail incorporating a seated area nearby? Bridlington has historical connections with the rest of the country besides events that have taken place near or in the town Examples; The Great Gail of 1871, a literary connection T.E. Lawrence, the obvious fishing link, the painter David Hockney and recently I read of the link with the Bronte family, Charlotte Bronte' s first view of the sea was from Bridlington. Apparently she stayed at Easton House Farm, near Boynton and would walk from there and follow the Gypsy Race to the harbour. Her novel Villette used Bridlington as a setting. Perhaps the redevelopment could promote a Bronte trail from Boynton to the harbour and a sculpture trail around town? The web-</p>	<p>The Council welcomes the support for the AAP and notes the ideas for detailed design proposals.</p> <p>Detailed guidance on the public realm in the AAP area is set out in the Bridlington SPD, including for the Gypsey Race Park and for public art within the park.</p> <p>While the Council proposes no changes to the AAP in response to the proposals, the Council hopes that the Kershaws will continue their interest in the town centre and will comment at planning application stages.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>site of the sculptor, Graham Ibbeson, has a range of sculptures showing what could be achieved in the environs of Bridlington. I also enclose several photos of sculptures from around the country.</p> <p>Other towns and cities use these links with people and events to promote and bring to attention the rich heritage of their own particular area for tourists and Bridlington has just as much as most to offer. The town is well situated to draw, as it already does, tourists from the industrial parts of the county and beyond. The new Spa and proposed redevelopment of harbour and town should bring lots more tourists, all with differing tastes, which could and should be catered for.</p>	
<p>Bridlington Civic Society</p>	<p>AAP + SPD</p>	<p>29/9/09: This Society wishes to add its support to the general principles of the Bridlington Town Centre Area Action Plan. We will wish to make comment on specific areas of the plan as they are implemented. We will also wish to comment upon future developments in relation to the Supplementary Planning Document. The SPD refers to issues that have been of special interest to this Society since its formation in 1972. We consider that this part of the documentation, having a major influence on the character of the built environment, will help to maintain the individuality of Bridlington. We are happy to lend our support to the Supplementary Planning Document in particular.</p> <p>3/10/09: Further to the Society response dated 29 September 2009 we wish to bring the following comments to your attention and include as comments on the Area Action Plan. These comments are made following more detailed discussions with members and it is likely that other comments will be forthcoming as details are revealed. Supplementary comments on Bridlington AAP: General note – The consideration of the documents making up the Bridlington AAP has proved to be a very difficult task. Whilst many members have attended the exhibitions and noted aspects of the plan as displayed, detailed examination of the documents has been difficult with one set available and computer literate members striving to examine hundreds of pages as displayed on their computers. Consequently we have already commented on the general views expressed on the overall plan, being one of support. However we have said that we reserve the intention to comment further on individual aspects as details are revealed. At this time we would bring to attention some areas of concern as revealed in recent discussions. New Town Centre / Burlington Parade. The stated intention is to provide some bigger units to attract more major retailers. Whilst the flipping of the Supermarket indicates that one major retailer in the form of the existing operator may be the expected outcome in that area no other indication of likely retailers is given. This despite</p>	<p>The Council welcomes the support of the Civic Society for the AAP and notes its particular support for the SPD. The Council also welcomes the continued interest of the Society and its involvement as the plan is completed and schemes move to planning application and delivery stages.</p> <p>The Burlington Parade proposals will provide a range of new retail units aimed at meeting the needs of both multiple retailers seeking larger and better-configured; the proposals are also aimed at improving trading conditions for existing retailers and at encouraging new businesses in some of the smaller units that the Burlington Parade scheme promotes.</p> <p>The Council welcomes the support for the bus interchange at the train station, although the Council stresses that neither the AAP nor SPD can dictate levels of bus service provision. Modelling of vehicle flows in the AAP area shows that the proposed routing, stops and drop off points for buses and coaches will not cause problems for other road users. There are precedents elsewhere for the successful implementation of Council control over coach drop-off, pick up and lay-over facilities.</p>

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		<p>the intention to cease to support retail in Prince Street where one of the retail backbone names of the UK currently trades. If M & S are not a key retailer in Burlington Parade then there has been serious doubts expressed about the success of the development. Other aspects of concern are of the possibility that the new retailers will create a clone town to the detriment of the local retailers who may not be able to join the Burlington Parade and are being left out of considerations because they are, or will be, outside the retail circuit. There is considerable anxiety that the locals or none nationals will be pushed out and this at a time when review of outlets determining whether they are local, regional or national indicated that Bridlington has a very good record of local retailers. The AAP area is so constrained in size that the needs of Bridlington are not being met by this plan and the consequences of the AAP regarding retail, but not wholly retail, are being ignored.</p> <p>Public Transport – Rail, Bus and Coach. (SPD pages 56/57) There are no recollections of discussions on this aspect and whilst the bus interchange at the railway station is supported this will surely be a transport interchange and not simply for bus interchange. Figure 3.7 shows bus routing through the town centre and proposed bus stops without indicating how the bus service will be organised. If the service routes remain similar to now then one can only assume the chaos will continue with buses dominating the town centre at times. If the type of service and routing is to be changed then consultation is required with input from users and potential users essential. Some modification of services could provide the means of travel for far more people than now particularly for town centre workers and others whose work does not require a car other than to use in place of a non existent public transport service or a service whose hours of operation are considerably shorter than the working hours of the potential users. Coach services are to follow the same routing as the bus services and drop off points are proposed at King Street, Harbour Top, South Cliff Gardens, the Spa and Promenade. Had consultation taken place then we feel sure this proposal would not be in the plan. Additionally the control from the TIC would have been shown to be impossible. This permission to visit idea seems draconian when a suitable drop off and pick up point (the transport interchange) would give a known point for visitors to assemble. The opportunity to disperse via Burlington Parade or via Gypsey Glen being a benefit to businesses located in that area. Additionally local bus services will serve the interchange giving easy return to coach pick up from the outlying tourist facilities in the Bridlington area. In considering the coach terminus it is obvious that if a coach party visiting for a particular purpose (show at the Spa) then that is the terminus for the journey and similarly for other locations but those termini</p>	<p>Provision for both long and short stay parking has been considered in detail throughout the preparation of the AAP and SPD and the evidence shows that the implementation of the proposals will lead to significant improvements in provision.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>and the main interchange terminus need to have plans for the dispersal, layover and recall (if necessary) of the coaches. Such dispersal needs to ensure that the coaches do not create traffic hazards or interfere with pedestrian routes. Suggestions for coach layover locations need consultation and input and suggestions that Limekiln Lane is a suitable location have already created very serious concern. Additionally suggestions that there is somewhere in the AAP area is beyond belief and leaves the imagination running wild imagining where this could be.</p> <p>Car parking – There is considerable concern that the provision of convenient spaces for the quick visit to pick up something, visit a cash machine / bank currently covered by the free one hour or cheating on double yellow lines etc has not been considered. Some visits of this nature could be replaced by bus journeys if services are re-modelled with very short interval services. It is our view that these areas should be covered in more detail in the SPD and that suitable, wide consultation should be held.</p>	
<p>Bridlington Harbour Commissioners</p>	<p>AAP + SPD</p>	<p>1.0 INTRODUCTION</p> <p>1.1 This Report has been prepared on behalf of the Bridlington Harbour Commissioners ('the Commissioners') to amplify their representations to the Second Preferred Options Draft Bridlington Town Centre Area Action Plan (AAP) and the draft Bridlington Supplementary Planning Document (SPD). The Report sets out in detail the Commissioners concerns about the proposals for a new Marina contained within the Plan.</p> <p>1.2 The Commissioners were established over 300 years ago by Act of Parliament and their present powers are derived from the Bridlington Harbour Act 1837, the Bridlington Harbour Confirmation Act 1928 and the Bridlington Harbour Revision (Constitution) Order 2004. The Commissioners consist of 11 Members, whose number includes the Chief Executive and Harbour Master. The Members are appointed on the basis of their specialist knowledge, experience or skills pursuant to the management of the Harbour including the management of the fishing industry, water related leisure activities, shipping and transport, safety or personnel management, commercial marketing and I.T., environmental matters and community interest. The Commissioners also have responsibility for financial management, the laws relating to England and any other skills or attributes considered to be relevant to the efficient and economic discharge of their function. The Commissioners are responsible for ensuring the effective and efficient operation of the Harbour.</p>	<p>The Council responds to the comments made by the Bridlington Harbour Commissioners in the order they are made, using the same numbering system.</p> <p>Introduction:</p> <p>The Council has involved the Bridlington Harbour Commissioners (BHCs) throughout in the process of preparing the AAP – both informally through several meetings on the AAP and the BHCs' representation on the Bridlington Regeneration Partnership and formally through the planning process. The Council has also, jointly with the BHCs and Yorkshire Forward, commissioned, and met with the BHCs many times to discuss and develop, the detailed design and technical work on the regeneration of the Harbour and the development of the Marina. The Council and Yorkshire Forward are funding this work at no cost to the BHCs.</p> <p>. The BHCs are full, active, members of the formal</p>

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		<p>1.3 The Commissioners are funded at no cost to the public purse being financed from Harbour dues and rental income from businesses and car parking using the Commissioners Shoreside Estate. The proposals set out in the AAP and SPD will have an adverse impact on the Commissioners ability to fulfil their duties and to be self funded.</p> <p>1.4 The Commissioners are actively involved in the planning process having previously submitted representations to the first 'Preferred Options Area Action Plan' and engaged in consultation with the East Riding of Yorkshire Council concerning the future of the harbour and the development of the Marina. This Report provides a context to the Commissioners representations as well as providing detailed comments on the various policies and proposals contained within the Second Preferred Option Draft AAP and the Bridlington SPD.</p> <p>1.5 The Commissioners have a number of concerns regarding the content of the AAP and SPD as follows:-</p> <ol style="list-style-type: none"> 1. The plans do not reflect the discussions that have been held with the Commissioners. 2. The plans will adversely affect the Commissioners ability to operate a Trust Port. 3. The plans are not costed and do not provide any flexibility or a 'fall back' position if funds are not available for implementation. <p>1.6 Although the Commissioners support the provision of a Marina at Bridlington, and have been working with the East Riding of Yorkshire Council and their partners to progress an acceptable scheme, the contents of the AAP and SPD do not reflect the content of these discussions. The Commissioners consider that the new Marina should meet the following requirements:-</p> <ul style="list-style-type: none"> • First, it overcomes the reasons for the rejection of the previous scheme by the Secretary of State; • Second, it does not prejudice the ability of the Commissioners to carry out their statutory duties; • Third, it can be funded and there is certainty that once development commences, the Marina will be completed. <p>1.7 This Report is divided into the following:- Section 2 Context to the Representations Section 3 Conclusion</p> <p>2.0 CONTEXT TO THE REPRESENTATIONS</p> <p>2.1 As set out in Section 1, the Commissioners do not object to the principle of a Marina at Bridlington provided it does not have an adverse impact on the Commissioners ability to fulfil their statutory and other duties. The</p>	<p>Marina Steering Group which also includes senior representatives from the Council and Yorkshire Forward. The work of the Steering Group is formally advised by a technical group comprising the BHCs, Council and Yorkshire Forward together with consultancy support.</p> <p>In respect of the BHCs' specific points, the Council responds as follows (with reference to the paragraph numbers in the representation):</p> <p>1.5.1 The Council cannot accept this point. The proposals in the Second Preferred Options draft of the AAP plan reflect the then up to date discussions and agreements with the BHCs. The BHCs, the Council and Yorkshire Forward have continued since the publication of the Second Preferred Options Draft to collaborate on the proposals.</p> <p>1.5.2 The Council cannot accept this point, and refers the BHCs to the several undertakings in the Second Preferred Options Draft AAP to the contrary (including in Proposed Policy BridTC18 on the Marina). The Council and Yorkshire and Yorkshire Forward fully respect the BHCs' statutory duties to the Trust Port; and the partnership work on the Harbour's regeneration and the creation of the Marina is, and has been from the outset, on the basis that the project will need to ensure that the BHCs remain able to deliver their statutory duties. This does not mean, as the BHCs have repeatedly acknowledged, that there will be no change in the existing Harbour. It does mean that any changes needed to the Harbour in order to achieve the regeneration of the AAP area must permit the Trust Port to operate, and to continue to do so in line both with the Port's statute and the duties to the wider community set by government policy on Trust</p>

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		<p>Commissioners have been discussing the proposals for the Marina with the East Riding of Yorkshire Council but are disappointed that contents of the AAP and SPD do not have regard to the Commissioners concerns. We set out in detail these concerns below.</p> <p>2.2 More generally, however, the Commissioners are also concerned that the Plans are not consistent and are contradictory in places. For example, the AAP states that operational land will be provided for both the Harbour and the Marina but that these uses will compete with housing development (200 units), hotel, retail development, leisure facilities and multi-storey car park. It is clearly important that the Plans are internally consistent and that the defined land uses can be satisfactorily accommodated without detriment to the operation of the Harbour and, in time, the Marina.</p> <p>2.3 The AAP also continues to state that the existing Harbour is poorly integrated into the town. As previously set out by the Commissioners in their representations to the first 'Preferred Options' AAP, the opposite is, in fact, the case as there are three roadways and eight pedestrian routes to the Harbour from the adjoining areas.</p> <p>Previous Marina Scheme</p> <p>2.4 It is obviously important that the Marina development overcomes the reasons for refusal set out by the Secretary of State following the public inquiry in 2003. The Council will be aware that in 2003, a 500 berth Marina for Bridlington at the Harbour was rejected by the Secretary of State on the basis that:-</p> <ul style="list-style-type: none"> • the proposal is contrary to the relevant planning guidelines; • it is excessive in scale; • it is in an inappropriate location; • it is defective in design; • it would not deliver the benefits claimed; • it would cause environmental damage; • it would adversely affect listed structures; and • there is real doubt whether the development will be achieved, even if authorised. <p>2.5 Although the extent and number of berths proposed in the new Marina has been reduced to 320, the design of the Marina development as shown on the Proposals Map is similar to that which was rejected by the Secretary of State in 2003. The concerns about the delivery of the scheme, the benefits and the impact on the listed structures also remain. It is, however, for the Council rather than the Commissioners to deal with these matters in any planning</p>	<p>Ports.</p> <p>1.5.3 The Council is confident that the AAP's proposals, including those for the Marina, are deliverable; and will not begin the construction of the Marina in absence of the funding to complete it (including cross-finance from the development of land for commercial and housing uses). There is also the potential for phasing the works to the Harbour and the creation of the Marina, as the text of the Second Preferred Options Draft and the many discussions between the Council, Yorkshire Forward have made clear. The Council has also made clear from the outset that the public sector investment in the Harbour and Marina is justified by the the significant improvements levered in the performance of the wider town centre and the job creation capacity of the AAP's proposals, particularly from Burlington Parade; and that the scale of the investment required to regenerate the Harbour and create the Marina could not be justified by the much more limited economic impact of these works were they separate from, and did not lever, the Burlington Parade scheme and the wider improvements in the Town Centre's performance. Therefore, a key aim from the outset has been the physical integration of the principal schemes. The purpose has been – precisely in order to optimise the value of one to the other, ensuring that the benefits of the Harbour and Marina investments are realised for the economy of the Town Centre as a whole. The Council, with the BHCs, have also considered, and to continue to work on, the phasing options needed to provide the flexibility that any major capital scheme on this scale requires. The Council has also long undertaken neither to propose nor to promote changes to the operational land and facilities of the Trust Port without provision of adequate alternatives to</p>

Respondent	Type	Full Representation	Response & Recommendation
		<p>application.</p> <p>2.6 The Commissioners note that the AAP and the SPD are being progressed in advance of the Core Strategy DPD for the East Riding. For this reason, the plans rely on the saved policies of the Joint Structure Plan for Hull and the East Riding (2005) and the Regional Spatial Strategy for Yorkshire and the Humber (2008) for its strategic policy context. Both the saved policies of the Joint Structure Plan and the RSS designate Bridlington as a 'Principal Town' where economic and housing development should be focussed. The Regional Spatial Strategy (RSS), however, states that the coastal towns in the Eastern Sub Area, including Bridlington, 'should be the focus for smaller scale economic and housing developments' (para 4.72). The Marina proposals, particularly when considered with the other proposals for the town centre included within the AAP, do not represent small scale economic and housing development. Conversely the proposals are large scale as they include most notably:-</p> <ul style="list-style-type: none"> • the development of the new Marina including new harbour buildings, operational land associated infrastructure with an extension to the listed North Pier, a new South Pier, a new non tidal locked basin, a new tidal basin and new half tidal basin and new areas of land reclaimed from the sea; • the Bridlington Parade Comprehensive Redevelopment Area including the realignment of the Gypsy Race, the delivery of new access routes, the delivery of the new car parking, the delivery of strategic areas of public recreation (Station Plaza, Gypsy Race Park, Burlington Pavement, Gypsy Courts, Town Square, Harbour Entrance and Harbour Plaza); and • the relocation of the Primary Retail Area away from the Town Centre Seafront to a new shopping area. <p>2.7 The AAP acknowledges that it is difficult to overstate the scale of the work entailed to create the Marina. In terms of the other issues raised by the Secretary of State, the proposed Marina is in the same location as that considered to be unacceptable; its design would adversely affect the listed structures and their curtilage; its construction over a long period would cause environmental damage and there remains doubt whether the development will be achieved, even if authorised. The Commissioners take the view, therefore, that the reasons that led to the rejection of the 2003 scheme have not been overcome in the new proposals and, therefore, there must be some doubt as to whether planning permission can be obtained.</p> <p>2.8 Notwithstanding these facts, the Commissioners confirm their support for the provision of a Marina at Bridlington but recognise that it is vital that the details of the scheme meet the criticism levelled by the Secretary of State. The Commissioners also need to be assured that the Marina proposals do not</p>	<p>ensure the Trust Port can continue to operate.</p> <p>2.1 The Council contends that the plans do indeed reflect the discussions and agreements with the BHCs.</p> <p>2.2 The technical work shows that the plans are consistent with the introduction of the development in the Harbour Top proposed; and the Council points out that this integration is fundamental to the funding case for the public sector's investment in the regeneration of the Harbour and the construction of the Marina.</p> <p>2.3 Notwithstanding the various entry points, the visual and functional integration with the town centre is poor, for all of the reasons set out in the draft AAP.</p> <p>2.4-2.5 The present Marina proposals bear no relation at all to the design of the previous scheme – neither in location, extent of beach take, scale of berths and hectares of 'made land', the types, location and quanta of landside development, nor in the relationship of the development to the town centre. The Council, as the BHCs are aware, is working closely with English Heritage on the treatment of the listed structures; with Natural England on the environmental effects; and with the Environment Agency on flood risk issues.</p> <p>2.6 The reasons for preceding the Core Strategy are set out in the draft AAP; the Government Office accepts the approach (there are now many precedents nationally); the RSS provided, in the policies for the principal towns generally and for Bridlington particularly, the needed strategic context although this is also a function of the town's scale, the need for its regeneration and the</p>

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		<p>undermine their ability to carry out their statutory and other duties or to raise finance. To this end, the Commissioners have been working with the East Riding of Yorkshire Council and the partners to progress an acceptable scheme but remain concerned about the content of the AAP and SPD.</p> <p>2.9 The AAP and, in particular, the SPD provide the opportunity for the Council to provide details of the proposals for the Harbour and the Marina. These details have not been forthcoming to the extent that the Commissioners are unsure about the Council's proposals. As the AAP makes clear, the Harbour is one of Bridlington's 'special assets' and it is, therefore, vital that its role and function is retained. The Commissioners need to be assured that the proposals for the Marina are capable of implementation without adversely affecting the operation of the Harbour and this can only be achieved through the provision of further details. The requirement of the Commissioners for all of the land within the harbour Estate in order to maintain the operation of the existing harbour was a crucial point made by the Commissioners in their representations submitted to the Council in December 2007.</p> <p>Statutory Duties</p> <p>2.10 The Commissioners need to ensure that the Marina does not have an adverse impact on the operation of the Harbour nor the Commissioners ability to fulfil their statutory duties. The AAP states that the Council and Yorkshire Forward are fully committed to ensuring that the Commissioners are able to fulfil their obligations as operators of the Trust Port and their duties to the Harbour's users (para 5.59). The Plan also states that the Marina will 'leave the Harbour Commissioners no worse off financially' (para 5.59). Whilst the Commissioners appreciate these supportive comments, the policies and proposals set out in the Plans do not reflect their concerns with regard to the enlarged Harbour and Marina facilities. In particular, the Council has not provided the necessary comfort that the Marina and Burlington Parade developments will not have an adverse impact on operational land within the Harbour. The Council and the Commissioners have not been able to agree a Memorandum of Understanding, let alone some form of legal agreement.</p> <p>2.11 It is difficult to reconcile the Council's support for the duties and financial guarantee's of the Commissioners with the contents of the Plan. In particular, the Commissioners consider that the land take associated with the construction of the Marina and its phasing will prevent their ability to operate as a Trust Port.</p> <p>2.12 The development of the Marina will take place at the existing Harbour. It is proposed to retain land within the existing Harbour (western end) and to</p>	<p>evidence on the measures most likely to be effective in achieving it; and the Core Strategy is catching up. The scale of development proposed is in keeping with Bridlington's role and function as Principal Town; the quanta of retail and housing are supported by the evidence base, both the parts of it that apply to the district as a whole and the parts that are specific to the AAP. The approach to the extension of the Primary Shopping Area is also wholly consistent with PPS4, including Policies EC3.b.ii on integrating extensions, EC3.b.iii in improving the centre, EC3.c in defining the Primary Shopping Area, and EC3.h in using 'tools' to improve the Centre's performance, including a town centre strategy, an AAP and preparing the policy foundation for using CPO powers to tackle land assembly obstacles to the pressing need to expand the centre. Quay Road/Prospect Street/Manor Street is in retail use along its west side on its east side along Prospect Street/Manor Street and is heavily trafficked by shopping pedestrians; most of it this street has long been part of the town's Primary Shopping Area (in the adopted local plan); the extension area – in providing a second anchor – follows a long-standing principle of shopping centre design (i.e., two anchors connected by a pedestrian route which is dominated by retail uses); the newly defined Primary Retail Circuit connects the established shopping area (the first anchor, focused on Chapel Street and King Street) with the second anchor; and the proposed policy requires the extension of the Primary Retail Circuit to link the second anchor with the established shopping area to create a single, enlarged, shopping area. Moreover, the evidence shows that one of the key reasons that the retail area underperforms (retains too small of a share of catchment spending on comparison goods) is the lack of units of a size and shape capable of</p>

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		<p>provide new Harbour Offices and Marina based operations along with boat repair, storage and associated facilities. The Burlington Parade scheme also includes part of the existing harbour and contains proposals for hotel, retail, leisure and housing uses. Within the area proposed for the new Harbour to the south of South Pier, the Council propose to reclaim land to provide further operational and development land to provide about 200 residential units, retail and leisure facilities, hotel, public spaces and car parking – no details have been agreed with the Commissioners regarding these uses and, in particular, there has been no mention of the construction of 200 residential units.</p> <p>2.13 The Commissioners consider that the area reserved for the ‘top side’ development is inadequate to meet the operational requirements of both the Harbour and Marina as well as the development of a hotel, houses, retail and leisure facilities and car parking. The land available within the existing harbour is managed by the Commissioners for its operational requirements. There is no spare or vacant land within the existing harbour available for new or extensions to meet any new operational requirements. It will, therefore, be necessary to ensure that the reclaimed land is sufficient to meet the needs of the operational requirements of the Marina as well as the significant amount of non-operational development that is being proposed.</p> <p>2.14 Furthermore, the Commissioners require additional land in advance of any development proposals progressed by the Council. The Harbour will not be able to operate to its present standard if land is lost to development. Prior to the commencement of any development, the Commissioners will require substitute land adequate for their activities and this land would need to be transferred to the Commissioners well in advance of the commencement of the development works to allow the Commissioners time to relocate their activities. The transferred land would also need to abut the Harbour/Marina to allow for its operational requirements.</p> <p>2.15 As the Commissioners require all of the land within the Harbour Estate to maintain the operation of the existing Harbour, and no alternative land provision is made, the Commissioners consider that the Marina and Bridlington Parade schemes cannot be implemented as shown on the Proposals Map.</p> <p>2.16 Subject to the agreement of the Commissioners, any reclaimed land within the Marina/Harbour development will need to accommodate:-</p> <ul style="list-style-type: none"> • Additional operational land for the harbour users that is not being met at the current time; • Operational land associated with the new Marina facility; • A hotel (maximum height of 7 stories); 	<p>attracting to the Town Centre representation from the kinds of multiple anchors that all but the most prosperous retail centres need to be competitive. The existing shopping area is heavily constrained in providing these units.</p> <p>2.7 The Council rejects as incorrect the view that the present agreed (with the BHCs) layout is the same as the previous marina proposal.</p> <p>2.8-2.9 The Council and BHCs have discussed many times the facts that: changes in the layout of the Harbour operations are necessary for Burlington Parade and therefore for the Marina to proceed; the delivery of Burlington Parade only becomes feasible through the inclusion of the Harbour Top and the improved integration of the Harbour and Town Centre; and because of this, the very substantial job creation potential of Burlington Parade can, in large part, be attributed to the regeneration of the Harbour and the development of the Marina. It is the creation of these jobs that justifies the public money to be invested in the Marina and the Harbour’s regeneration. Moreover, as the BHCs know, the technical work to establish the feasibility of rearranging the Harbour Top activities has been undertaken in discussion with the BHCs, and it demonstrates that the phasing could occur in advance of the construction of the Marina should this prove beneficial or necessary. The refinement of this feasibility work is being done with the BHCs.</p> <p>2.10-2.17 The Council refers the BHCs to the Council’s many undertakings in the AAP in respect of protecting the BHCs’ ability to fulfil their statutory duties as the operators of the Trust Port. There will need to be changes to the way the operational and non-operational revenue-</p>

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		<ul style="list-style-type: none"> • 200 dwellings; • Retail and Leisure Uses; • Car parking - The AAP identifies 159 public car parking spaces is a decked structure at the harbour (para 5.37 and Policy Brid TC17). On the basis of a requirement of 0.75 car parking spaces per berth, a 320 berth proposal will require an additional 172 spaces, requiring a total of 331 spaces to be provided. <p>2.17 Other than generalised block drawings and sections, no details are provided within the AAP or the SPD showing how the above development can be located on the existing and reclaimed land. The Commissioners strongly object to using the Harbour land for non-Harbour/Marina uses as proposed in the Burlington Parade scheme until the provision, phasing and funding of the operational land is agreed.</p> <p>Funding</p> <p>2.18 The proposals set out in the AAP are ambitious, comprehensive and represent a significant financial cost in their implementation. The AAP acknowledges that the costs of implementing the AAP will be substantial and that 'it is difficult to overstate the scale, complexity and demands on all parties of the work entailed to create the Marina'. The scale of development is such that it would need to be implemented over a period of years. The Council state that, with support from Yorkshire Forward, it proposes to assemble the whole of the Burlington Parade comprehensive redevelopment site and 'invest up front' in the infrastructure, parking and public realm'. Notwithstanding the goodwill shown by the Commissioners, the Council also makes clear that it will use its powers and exercise its rights including compulsory purchase, to ensure that the Burlington Parade and Marina are delivered in the plan period.</p> <p>2.19 Neither the AAP nor the SPD set out how the proposals will be funded. There is no Business Plan nor is there any guarantee that funding will be available over the plan period to implement the various schemes that comprise the AAP. Due to the recession, the Council has already extended the timetable for the delivery of the AAP from 2016 to 2021. Given the substantial investment required and the current constraints on public finance, there can be no certainty that the proposals for the Marina nor the Burlington Parade will be delivered. The Commissioners are concerned that unless funding can be guaranteed at the outset, the development proposals may commence only to be delayed or abandoned due to lack of funding. A partially implemented development, particularly in respect of the works to create the Marina, would be a 'worst case' scenario adding to the decline of the town rather than</p>	<p>generating activities are laid out, and the technical work shows that the Burlington Parade scheme can be introduced alongside these changes with no harm to the operation of the Trust Port. The proposals for parking are set out in full in the AAP on the basis that the Harbour and Marina are integral parts of the Town Centre; the Council does not accept the very high parking ratio of 0.75 space, on site, per berth; and the Council is collaborating fully with the BHCs on the detailed layout concepts for the landside (as well as waterside) elements of the regenerated Harbour and the Marina</p> <p>2.18-2.25. The Council and Yorkshire Forward are committed to the plan's proposals, and are promoting them on the basis that they are feasible. The final version of the AAP will contain a more detailed delivery strategy and will be supported by a fuller delivery report as part of the evidence base. There is flexibility built into the proposals, including in their phasing. The phasing plans for the schemes will ensure that each phase produces a functioning scheme in its own right, notwithstanding the intention, as set out in the AAP, to deliver the full scale of the development proposed in the locations proposed.</p> <p>The Council proposes no changes to the AAP in response to the comments, but continues to work with the BHCs to develop the details of the proposals and to remove the BHCs' remaining concerns.</p>

Respondent	Type	Full Representation	Response & Recommendation
		<p>enhancing its prospects. In order to avoid this outcome, the Commissioners consider that no development should take place in respect of the development of the Marina until the finance is in place for its completion.</p> <p>2.20 In addition, the AAP and the SPD should provide for a ‘fall back’ proposal should funding not be available and the full extent of the Marina as proposed cannot be provided. The Commissioners have produced a number of alternative smaller and cheaper Marina proposals which make use of the existing Harbour infrastructure and do not require a new pier (other than the extension to the North Pier to reduce surge), reclaimed land or other infrastructure. By way of an example, an illustrative scheme is attached Appendix 1 which shows:-</p> <ul style="list-style-type: none"> • the Marina within the confines of the existing Harbour; • an area of operational land (but not the whole requirement) for the associated Marina and Harbour facilities; • capacity for approximately 250 berths; • an impounded water area for the Marina; • a tidal Harbour for the fishing boats; • an enlarged fish quay; • a new pier and lock; • landing area for pleasure boats; • an extension to the North Pier; • removal of the Chicken Run Jetty. <p>2.21 A Marina provided within the Harbour has a number of advantages:-</p> <p>(i) it protects the Listed Piers and their setting. As set out in the AAP, the ‘Harbour is the Town Centre’s single greatest asset’ and a Marina within the existing Harbour would ensure the protection of its setting;</p> <p>(ii) it could provide 250 berths, making best use of the existing Harbour infrastructure,</p> <p>(iii) it provides adequate space for the ‘top side’ development;</p> <p>(iv) it provides impounded water adjacent to the Town Centre;</p> <p>(v) it could prevent the tidal flooding of the Harbour Road and adjacent shops;</p> <p>(vi) it is more cost effective than the 320 berth Marina proposed by the AAP as it does not require the creation of a new pier, breakwaters and associated infrastructure;</p> <p>(vii) it can be delivered through a Harbour Revision Order and avoids the need for a Transport and Works Order and widespread Compulsory Purchase of land. The cost savings actioned through the provision of a Marina as part of the Harbour would allow additional investment in the Burlington Parade proposals which should be carried out separately to any development at the Harbour; and</p>	

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		<p>(viii) with good management, the creation of the Marina could be achieved without adversely affecting the existing operation of the Harbour.</p> <p>2.22 The Commissioners are also concerned that the financial viability of the Town Centre and Marina proposals is undermined by the need to provide:-</p> <ul style="list-style-type: none"> • 40% affordable housing as part of any major housing development; • the 10% requirement for energy supply from on-site low carbon renewable technology for housing schemes of 5 dwellings or more and for other developments with a floor space in excess of 250 sq metres; • achieve 'silver' on the Building for Life standard for any housing development in excess of 14 units; • a minimum of BREEAM 'very good' and/or Code for Sustainable Homes 'Level 4' for all major developments; • financial contribution to the provision of public realm; • contributions towards sustainability in respect of design, layout, building form, use of sustainable building materials, water capture and recycling, recovering and recycling waste, and contributions towards biodiversity and geological conservation; and • preparation of Development Statements for all major development within the designated Town Centre. <p>2.23 Whilst the Council are keen to encourage inward investment the above requirements increase the costs of development and, therefore, its provision. In the Regeneration Areas of the Burlington Parade and the Marina, the Commissioners consider that the above requirements should be relaxed so as to maximise the attractiveness for private sector investment in the town.</p> <p>2.24 These requirements also undermine the financial viability of investment in the harbour in the short term, as these provisions would need to be met as part of any development proposal that the Commissioners may wish to bring forward to improve the Harbour. In advance of the completion of the Marina, new proposals by the Commissioners to improve the harbour may prove to be uneconomic by the need to meet these requirements.</p> <p>2.25 Finally, the Commissioners duties and responsibilities are also adversely affected by the Council's policy not to allow any development at the Harbour unless it conforms to the provisions of the AAP. Again, the development of short term improvements to the harbour may be constrained by the implementation of this policy. The Commissioners need to be able to implement improvements to the Harbour as part of there statutory duties irrespective of whether or not the Marina and Burlington Parade schemes are coming forward.</p>	

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		<p>3.0 CONCLUSIONS</p> <p>3.1 Having regard to the above, the Commissioners OBJECT to the Second Preferred Draft Bridlington Town Centre Area Action Plan and Bridlington Supplementary Planning Document on the basis that the Marina proposals, in terms of their phased implementation and lack of detail, will have an adverse impact on the operation of the Harbour contrary to the discussions held with the East Riding of Yorkshire Council, Yorkshire Forward and other parties. The Commissioners consider that the plans would prejudice their ability to carry out their statutory duties.</p> <p>3.2 In summary, for the reasons set out in Section 2 of this Report, the Commissioners object to the following policies and their supporting text:-</p> <ul style="list-style-type: none"> • BridTC1 and BridTC2 in that it places a moratorium on any development proposal that does not meet the objectives of the Town Centre AAP and the SPD; • BridTC2 in that it incorporates part of the Burlington Parade scheme into the harbour reducing the land available for operational purposes; • BridTC2, BridTC3, BridTC16 and BridTC19 in that it requires a contribution to public realm; • BridTC3 in that it requires high levels of sustainability for all major developments to the potential detriment of encouraging inward investment; • BridTC5 requiring Development Statements in that the requirements are duplicated in Design and Access Statements; • BridTC8, BridTC10, BridTC12 and BridTC13 concerning the extent/uses of the Burlington Parade and the apparent conflict with the operational requirements of the harbour; • BridTC15 and the need to provide car parking to meet the operational needs of both the harbour and the Marina; • BridTC17 and BridTC18 for the reasons set out above and in Section 2 of this Report. <p>3.3 The Commissioners also wish to see a monitoring and delivery programme to ensure that, prior to development commencing, the funding is available for the completion of the Marina development. The Commissioners are concerned that the development proposals are ambitious and may not be achievable. Indeed, development of the Marina may commence and not be completed to the detriment of the operations of the Harbour and the town as a whole.</p>	
Bridlington Town Council	AAP	At the Council meeting on 16th September 2009 the Bridlington Town Council resolved to submit the following comments for the AAP Second Preferred Options. Comments on the Plan are compiled from previous comments and	The Council thanks the Town Council for its comments – a number of which have been discussed with the Council and its members

Respondent	Type	Full Representation	Response & Recommendation
		<p>those Councillors who have made other comments:</p> <p>1) The Council considers that the removal of the sea front fun fair would have an immediate beneficial effect on the on the presentation of the town. It should be relocated south of South Shore village with adequate sound proofing, at no inconvenience to the town.</p> <p>2) Whilst the Council supports the concept of a Marina, it does not support the proposal of an estate of 200 housing units and buildings five to seven stories high which would dominate the harbour and cause further congestion to the town. The view of the harbour from South Cliff Road should be maintained. Attention is drawn to the conclusion of the Secretary of State's Report on the Yorkshire Marina Inquiry, Page 155 11.103 that "there is no case for a development platform for the provision for shops, offices and commercial or leisure facilities".</p> <p>3) The Council considers that any town square should be at Prince Street, it does not consider Queen Street to be a suitable site.</p> <p>4) The Council objects to the proposal to prohibit short stay parking in the town centre and predestination The existing arrangements should remain to allow the predominantly elderly residents easy access to facilities, 12 months of the year. The Plan appears to favour holidaymakers from mid May to mid September with no regard to the residents for the remainder of the year.</p> <p>5) The Council considers that King Street should be opened to vehicular traffic with car parking. The Market should be relocated to the town square at Prince Street.</p> <p>6) The Council considers that a Palace multi-storey car park should accommodate more cars than the 255 proposed spaces.</p> <p>7) The Council is concerned as to the future of the north of Hilderthorpe Road with no prospect of development in the foreseeable future.</p> <p>8) The Plan makes reference to any new build being in contemporary style. The Council considers that all new build should match the existing predominantly late Victorian or Edwardian facades and roofs of the town. A sore thumb being the new shop at the north of Chapel Street</p> <p>9) In the light of Global Warming and the predicted likelihood of torrential rain the existing five sewage/rain holding tanks on the Gypsy Race should be supplemented with additional tanks, to guard from the pollution of the Race and Marina</p>	<p>during the AAP's preparation. The Council is sorry to note that the Town Council retains a number of preferences that are not reflected in the AAP, but proposes no changes in response. The Council's reasoning in each case is as follows:</p> <p>1) The AAP's proposals are consistent with the relocation of the fun fair should it prove commercially feasible. The AAP also strongly promotes the year round use of the Town Centre Seafront so that it is a year round asset of value for the residents of Bridlington as well as for seasonal visitors.</p> <p>2) The AAP's proposals for commercial and housing development in conjunction with the Marina investment are very different from those promoted by the previous scheme, both in scale and content and location. Instead, the AAP promotes – as a conjoined priority with the Marina – the regeneration of the Town Centre, and proposes the Marina as one of the principal means of achieving this. The proposals for commercial and housing development are designed both to animate the Marina year round, add to its destination appeal (to support its value to the town's economy) and to help finance the development. Thus, the comments made at the earlier inquiry are in respect of a scheme that is not the same at all the AAP's proposals.</p> <p>3) The Council has examined and consulted upon a number of options for the new town square and concludes that Queen Street/Bridge Street performs best in the context of the proposals for the town centre as a whole – including in relation to the existing shops, the location of the heritage assets, the siting of the Burlington Parade and Marina schemes (which themselves have been</p>

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		<p>10) The refurbishment of Leisure World should result in the provision of an Olympic size swimming pool with adequate space for spectators</p> <p>11) It is considered that the proposed 600 housing units on one side of Hilderthorpe to be excessive, further congesting an already congested town centre.</p> <p>12) The present Tesco site is quite adequate, the Hilderthorpe car park should be put to a more useful use.</p>	<p>subject to options appraisal) and the space required to create a true heart for the town centre.</p> <p>4) All of the evidence shows that pedestrianisation improves shop turnover. Disabled parking spaces and shopmobility support will be provided nearby. There is also a pressing need to reduce the congestion in the town centre that is caused by vehicles circulating to find parking spaces.</p> <p>5) The Council notes the proposals for King Street and will keep these in mind.</p> <p>6) The numbers are calculated with reference to site capacity (and the impact of the new structure on the townscape), traffic effects and the maximum parking standards in the Regional Spatial Strategy which the Council is required to work within.</p> <p>7) The decline of Hilderthorpe Road has been taking place over a very long period – well before the regeneration proposals were put forward. The street had no sustainable future as a retail street, and regeneration for other uses was then, and remains now, pressing; the evidence shows that this is best achieved as part of the comprehensive redevelopment of the Burlington Parade site. Where the Council is able to acquire property, the Council is leasing it back or encouraging temporary lets. The timescale for redevelopment is necessarily long for regeneration schemes on this scale; but the fact of the lengthy timescale is, however regrettable, not a reason to reduce the ambitions for regeneration.</p> <p>8) The Council agrees that contemporary development should fit comfortably with the townscape and respect the distinctive character</p>

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			<p>and heritage of the town centre.</p> <p>9) The Council is aware of the issues and is in discussion with Yorkshire Water; there is, however, no evidence to suggest that the storm water capacity is in adequate; and the proposed works to Gypsy Race, coupled with the creation of the parkland, will reduce flood risk on the one hand and increase the carrying capacity on the other.</p> <p>10) The Council will bear in mind the Town Council's view on the swimming pool.</p> <p>11) The housing numbers are a response to a number of considerations, including the regeneration of the town centre and the housing numbers to be provided in Bridlington to meet the Council's responsibilities under the Regional Spatial Strategy and the Core Strategy. The numbers are also supported by the Council's Housing market Assessment; and they are not all to be located on one side of Hilderthorpe Road, but throughout the whole of the Burlington Parade site, avoiding zones of highest flood risk.</p> <p>12) The Tesco site is, as currently laid out, poorly related to the established Primary Shopping Area; and it performs best of all the options for extending the Town Centre's retail offer which is essential to the Town Centre's regeneration.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>
<p>Bridlington Youth Council</p>	<p>AAP</p>	<p>Introduction Bridlington Youth Council is a committee of young people charged with representing the views of the young people of the town to those making decisions or policy which will impact upon them. Based on this role the Youth</p>	<p>The Council welcomes the Youth Council's support for increasing and improvement employment opportunities in Bridlington; for improving the range of shops; the size and</p>

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		<p>Council were very keen to ensure that the young people within Bridlington were aware of the Area Action Plan , what it meant for the future of the town and had a chance to comment on the document in a way that could communicate what they wanted in the future for Bridlington. In order to find out what the young people in Bridlington thought of the document they had the idea of using citizenship lessons in both secondary schools, Headlands and Bridlington Schools, to give information and receive feedback. This was arranged and sessions were held for Years 7, 8, 9, 10 and 11 in Bridlington School and years 7 and 8 at Headlands School. Overall the youth council were able to receive feedback from 194 young people. This information has been collated to make this response.</p> <p>Response Bridlington Youth Council feels, based on the information it has collected, that Bridlington needs improving overall.</p> <p>Its feels that the town needs more jobs for local residents, especially young people, in sectors such as retail and catering/ customer service.</p> <p>The Bridlington Youth Council feels strongly that Bridlington needs better quality and a wider range of shops. The council feels that the town needs better fashion, sports, and game/toy shops with a better range of cafes/ fast food restaurants as well. It feels these shops should be easily accessible by all.</p> <p>The Bridlington Youth Council feels that Bridlington needs a marina and that the proposed size and location are right for the town.</p> <p>The Bridlington Youth Council cannot give any clear support for the idea in the AAP that the Bridlington needs more places for people to live in the town centre. There was a very even split between the number of young people who responded that more town centre housing was a good idea and those who thought it wasn't.</p> <p>The Bridlington Youth Town Council feels the town centre needs more tourism attractions/ things to do during the day including a new and improved cinema and an ice arena.</p> <p>It also feels that the range and quality of things to do in the evening could be improved with a greater range of sports activities available through an improved Leisure World. An idea of better parks also gained support from young people.</p> <p>The Youth Council also feel that some types of Youth Centre which could house a range of activities is important as nothing of this type exists at present</p>	<p>location of the marina; and improved parking and proposed use of Section 106 receipts.</p> <p>The Council promotes housing in the town centre because it is one of the most sustainable locations in which to meet its housing obligations, and the housing offer will achieve a range of important objectives that would not be otherwise possible to satisfy – including natural surveillance, an active town centre all year round, a more diverse local labour market and more spending to support a more diverse and appealing range of shops and things to do and see.</p> <p>Policies BridTC 9 and BridTC 10 of the Second Preferred Options AAP support additional development for tourism leisure uses, although a key aim of the plan is also to diversify the town's economy.</p> <p>The Council remains hopeful that it will be possible to provide a Youth Centre of some sort in the town centre, perhaps as part of the development of the new town square. The Council will explore funding opportunities, but cannot, for a wide range of reason, include it as a S106 obligation upon the Burlington Parade scheme.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>and this facility could create a youth hub in the town centre. The Youth Council would advocate the use of Section 106 money to achieve this.</p> <p>The Youth Town Council also supports the Section 106 money being used on new town centre parks and supports the idea of opening up the Gypsy race and making a park around it.</p> <p>The Bridlington Youth Council supports the idea of more car parking within the town centre area.</p> <p>The Bridlington Youth Council supports the idea of grouping all the arcades and amusements in one place and feels that the current location to the north of the harbour is the best place to do this.</p>	
CABE	AAP + SPD + SA	<p>Thank you for consulting the Commission for Architecture and the Built Environment. Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider. A good spatial plan is essential to achieving high quality places and good design. CABE believes that getting the local development framework core strategies right is one of the most important tasks planners are undertaking. We have run informal workshops with over 50 local planning authorities to look at how well design is being embedded in core strategy documents, which form part of the local development framework. The workshops offer local authorities independent informal advice from an expert panel and allowed us to identify the strengths and weaknesses of current approaches to spatial planning and how design, functionality and space are dealt with in core strategy documents.</p> <p>The workshops have found that, commonly, emerging core strategies:</p> <ul style="list-style-type: none"> • need to set out the vision and the strategy more clearly • too often focus on policies rather than the strategy • need to focus on how to make places work better • lack maps, diagrams and photos to illustrate the strategy, best practice or to key features of the local area. <p>There are three core messages for local planning authorities preparing local development frameworks that have emerged from our workshops.</p> <p>Tell the story A good LDF needs to tell the story of the place, explain how it works and highlight its qualities and distinguishing features. Telling the story helps everyone understand how change will be achieved.</p>	The Council notes the comments, and stresses that every one of the them has been firmly in mind in preparing the AA at each stage.

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		<p>Say what is wanted Use the LDF to set the agenda, express aspirations and be proactive and positive about the future of the place and say how to achieve this. Set out what you expect in terms of design quality and back this up with hooks to other development plan documents and supplementary planning documents.</p> <p>Say it clearly Make the LDF relevant and comprehensible to a wide audience. Use diagrams at the start of the process to inform the text and communicate the strategy.</p> <p>The CABE website has further information about the workshops and key findings www.cabe.org.uk/planning. We have also attached some key questions that we use in the workshops for you to consider throughout the development of your LDF documents.</p> <p>You might also find the following CABE Guidance helpful. “Making design policy work: How to deliver good design through your local development framework” “Protecting Design Quality in Planning” “Design at a glance: A quick reference wall chart guide to national design policy”, “By Design: urban design in the planning system towards better practice “ (published by DETR) “Creating Successful Masterplans – a guide for clients” and “Design Reviewed Masterplans”</p> <p>These, and other publications, are available from our website www.cabe.org.uk</p> <p>KEY QUESTIONS – CORE STRATEGY WORKSHOP</p> <p>Vision Does it provide a locally distinct vision, setting out what the area will be like? Is the vision communicated clearly and effectively? And in a way that others will understand? Does the vision reflect the Sustainable Community Strategy? Does the vision reflect the key characteristics and issues of the area? Has the functionality of the place and its role within the surrounding context been considered?</p> <p>Spatial Expression Has a holistic approach to the function, role and key characteristics of place been adopted? Has urban design evidence base and analysis informed the identification of issues and development of the options?</p>	

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		<p>Does the Core Strategy reflect the Sustainable Community Strategy vision and objectives?</p> <p>Has there been involvement and buy in from LSP's, internal and external stakeholders? Is the plan realistic – has a delivery and implementation plan been set out?</p> <p>Does the strategy understand, analyse and integrate transport, employment, residential, environmental and other spatial themes? Are these issues communicated spatially and effectively?</p> <p>Does the document maximise the use of maps, diagrams, illustrations, photographs and examples to illustrate key points and characteristics? Are available mapping, layering and analysis technologies used?</p> <p>Design Quality</p> <p>Has design been considered across all aspects of place?</p> <p>How is design dealt with in the Core Strategy and has it been communicated clearly? Has a design ethos been embedded in the strategy?</p> <p>What priority has been placed on design issues? Is there recognition of local design qualities?</p> <p>Is the strategy robust? Will it help deliver the aspirations for the area?</p> <p>Are there hooks in the core strategy to other LDF documents (AAP's or SPD's) that deal with strategic or detailed design issues?</p> <p>How will the policy be implemented? Any quality monitoring or indicators required? Does it establish standards or assessment criteria for design quality? Does this extend to both urban design and building design standards? And how this will be measured?</p>	
Christ Church	AAP + SPD	<p>The council have drawn up proposals for the change of the town centre which I broadly welcome. In the report they state the importance of Christ Church as a landmark building in the town centre and the implication is that Christ Church with the Cenotaph park adjacent to it have a place in the thinking of the planners of the new proposals.</p> <p>My concerns are:-</p> <p>1) No parking on this area of Quay Road combined with a reduction of road width will mean funerals and weddings could obstruct the traffic flow. What guarantees could you offer to make sure that our current traffic flow is not hindered either for church services on Sunday and midweek, for visitors to site or in deliveries?</p> <p>2) The non green linkage between Christ Church and the Gypsey Race Park.</p>	<p>The Council welcomes the general support for the AAP's proposals, and responds to the specific points as follows:</p> <p>1. The reason for restricting parking on Quay Road (with an exception for disabled badge holders) is to improve overall traffic flows in the town centre and to enhance the pedestrian environment. The increased provision of car parking close to the Church should prove adequate to meet the overflow needs for close-by wedding and funeral parking.</p>

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		<p>The proposed housing between the new Gypsy Race park and Christ Church which will obscure the building (except the steeple), will dominate the new park area, and potentially make the area look like a university campus. It should be an area which enhances the already given value of Christ Church as a building. I appreciate the aim of the proposal to ensure the park is watched over by residents, but the green area is less than the concrete/ paved area and reduces the park to a small area immediately next to the river. To fulfil the stated aims of the report, there should be more green area linking the river with the church. I also would suggest any properties that are built are designed to blend in with the Victorian buildings in the Cenotaph square.</p> <p>3) Car Parking arrangements. I could not find in the report any reference to car parks though I think there might have been some reference to one being built as part of the railway station retail facility. Where would the disabled or elderly; the families with children park to access the church services, and the other activities on site.</p> <p>I require some reassurance that within these plans, there has been some thought given to helping Christ Church to continue to deliver community programmes and church services. The Church has over a thousand people a week visiting its site through its many community events. It would be tragic if having received the Chairman's county award this year for our work in the community, these proposals made the real contribution Christ Church will make to the community difficult or impossible to deliver in the future.</p>	<p>2. The analysis and guidance on design issues in the SPD and the masterplan set out in the AAP emphasise the importance of views to Christ Church from Gypsy Race Park and demonstrates how they can be retained and enhanced.</p> <p>3. There will be an increase in the numbers and quality of parking provision close to Christ Church.</p> <p>The Council is concerned to ensure that Christ Church continues to flourish, and the proposals for improving its setting, access, views and parking support are all designed precisely to do so.</p> <p>The Council proposes to changes to the AAP in response to the comments.</p>
Coal Authority	AAP	<p>Thank you for consulting The Coal Authority. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line.</p>	<p>The Council notes the comments.</p>
D Stone	AAP	<p>Cycles - Lots more cycle parking spaces all round town centre. Route into town from North maybe using the park.</p> <p>Marina - Bring bulk materials in by sea.</p>	<p>The AAP promotes a new cycle route into the town centre from the north as part of the Access and Movement Strategy; and the Gypsy Race</p>

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			<p>Park includes a cycle route along it.</p> <p>The AAP's sustainability standards, for the AAP area as a whole and in particular for Burlington Parade (which will have public investment and therefore higher sustainability standards than typically are commercially feasible), call for substantial increases in cycling and facilities to encourage it.</p> <p>The Council is not able to direct the delivery of goods by any particular means as part of the AAP or SPD.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>
D Torn	AAP	<p>I am in full agreement with the outlined plans for the marina. I came to this town as a youth with my parents in 1948 and it was being discussed then. I am now 76 and it is still being discussed, please get on with it. I tend to agree with councillor Marsburg the Mayor, i.e. not in my lifetime will I see it. Yes the car park which is proposed should accommodate more than 255 vehicles. I see no problems with the 200 town houses proposed providing they all have garages. Building in town is better than using greenfield sites.</p> <p>With reference to King St. I feel that it should remain as it is; pedestrianisation in town centres is now the established norm, it is nice to walk around parts of the town centre without having to dodge traffic and being honked at by impatient drivers.</p> <p>I agree that the funfair should be moved somewhere else where there is room for it to expand. The present site is now fully occupied - Limekiln lane perhaps?</p> <p>The suggestion that the swimming pool should be extended to olympic size is silly. The larger the pool the more it costs to heat and maintain. It would also involve high diving facilities with the inclusion of a well at least four metres deep. Who would use it to justify it being there? I speak as a swimmer who uses the pool and the majority of people I see swimming there cant even dive off the pool side never mind a spring or high diving board. The wave pool and slide facility is excellent. Again I speak as a former scout leader who has taken</p>	<p>The Council welcomes the support for the Marina proposals, for building housing in the centre rather than on greenfield sites, and notes the comments in respect of the pedestrianisation of King Street and the comments re Leisure World.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>groups of scouts swimming at Bridlington Leisureworld and they love it just as it is. There is no point in putting in an expensive facility which is not going to be used.</p>	
<p>E Casson</p>	<p>AAP</p>	<p>The Vision Once the AAP has been ratified and if possible sooner a 'Scale model of Bridlington 2021' with all the projects duly completed should be displayed in a glass cabinet at a central location [the Spa?] will help the community at large to understand clearly what the final outcome is likely to look like or as close as to it. This will at a stroke graphically answer many people's unanswered questions and provide a clearer understanding of what is being proposed.</p> <p>The Vision for Bridlington Visitors expectations should not only be met but exceeded to achieve the all important loyalty and repeat 'foot fall' which will increase the number of visitors returning to the town on a regular basis and indeed new ones as well through the all important 'word of mouth recommendations'. It is therefore imperative that the regeneration of Bridlington through the AAP is not restricted or cut back in any way. The Vision and hence the AAP must be capable of taking in the wider and bigger picture for a more sustainable 'all year round' economy.</p> <p>Summary of Evidence Taking in the bigger picture surrounding the Marina is that the Marina will sit at the centre of an International Marine Sporting Venue of excellence as the Bay and the surrounding cliffs act as a natural 'amphitheatre' for spectators to watch both power & sailing competitions as part of the world wide sporting calendar as well as nationally. The economic return from this with the right marketing employed is significant all on its own.</p> <p>BridTC8: Mixed Use Development Town centre 'surveillance' measures to combat anti-social behaviour as stated should take on a more natural indeed 'subtle' means. Currently with all the CCTV coverage with the load hailer systems our senior citizens could be forgiven for thinking that they had gone back in time to some World War II POW camp!?</p> <p>BridTC9: Tourism Attractions The regeneration process presents the community with an ideal opportunity to engage with its younger and up and coming generation which will as a result resolve many of the social issues that have created a loss of respect, an air of miss-trust and in-balance. This can be done quite simply by running a</p>	<p>The Vision The Council agrees that a model would be a useful addition to the AAP's materials, but has not commissioned one because of the very high cost. The Council believes, notwithstanding this cost saving, that the range of graphic and visual materials provide a good representation of how the proposals might look. The public will have a chance to comment on actual proposals as planning applications come forward.</p> <p>The Vision for Bridlington The Council welcomes the support for the year round aims in the AAP.</p> <p>Summary of Evidence The Council accepts, and agrees, that marketing is critical.</p> <p>BridTC8: Mixed Use Development The Council welcomes the support for the natural surveillance proposals.</p> <p>BridTC9: Tourism Attractions The Council notes the idea.</p> <p>BridTC14: Access and Movement The Council agrees with the points, and takes them on board in the AAP.</p> <p>BridTC18: The Marina The Council notes the ideas.</p> <p>Timetable for Achieving Outputs The Council notes the points.</p>

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		<p>competition of a nature that invites the younger generation to design artistic features as centre pieces at strategic points in the town that also encompasses our historic heritage?</p> <p>BridTC14: Access and Movement Traffic Congestion: The use of 'intelligent' traffic lights should be considered so that regardless of the time of day, week, month or season the traffic light's controlled time sequence will adjust itself automatically to keep the traffic flowing. As an example on Cardigan Road out of a queue of 20 cars only 5 cars will get through before the lights change back to red once again. Also the number of powered wheel-chairs and mobility scooters is on a steady increase due to our ever increasing retired and elderly population therefore the number of conflicting interactions on a daily basis is also on the increase exponentially. The regeneration and layout of Bridlington through the Burlington Parade development and the Marina to the harbour through the town's core must take this into consideration and develop the intended access ways with this in mind. In Holland they took an opportunity to develop separate bicycle & moped tracks to reduce the likelihood of the potential daily conflicting interaction to a minimum.</p> <p>BridTC18: The Marina Following a review of the more detailed outline plans for the proposed Marina as laid out in the Harbour Commissioners maintenance building during Maritime Heritage Day and in line with previous discussions and communications I would consider and recommend the following; Super-yacht owners do plan their yachts annual dry-dock & refits in northern and western Europe [Bremerhaven - Germany, Rotterdam - Holland] around visits to the Scandinavian Fjords after which they could call in at Bridlington Marina en-route to the Mediterranean for visits to the Horse Racing at York, a football match at Manchester United or Hull including the Deep as well as playing Golf at the new Bridlington Links Golf Club and indeed to see a major band/entertainer or event at the newly refurbished Spa so they could well stay easily for 5-7 days if not longer on a designated berth without interruption. Available berths in the UK are at a premium. For large sailing yachts, [their also increasing in size year on year] large motor yachts and super-yachts up to 50 meters LOA; That the half-tidal basin is enlarged to at least 100 meters x 100 meters by extending it further eastward with a dredged approach channel. This I feel will give the Marina a true capability with versatility and flexibility built in allowing sufficient room for manoeuvrability. The specifications for a typical 50 meter super-yacht are as follows for your information: LOA 51.82m [170'] Beam 10.08m [33'] Draft 3.12m [10' 03"] The Royal Navy fishery patrol</p>	<p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>vessels, University Naval training vessels and mine hunters will also be able to use this basin for official visits and when the need arises. I also see that there is plenty of room in the tidal basin and harbour entrance to accommodate a Fast-cat ferry service which to date has been well received in local and regional business circles by linking the Humber estuary with the East Coast resorts. For efficient harbour and marina operations the new offices will need to have a control room with clear 'line of sight' over and above the whole complex which could be incorporated as part of the new lock's control room?</p> <p>Timetable for Achieving Outputs</p> <p>I only know too well the vital importance of research and development work along with careful consultation which is necessary to deliver a sound business case therefore I fully endorse and understand the processes that have been outlined in this document. The economic recession we are currently going through can be ignored simply by the passage of time as once the final plans have been approved the recession will have ceased to be a factor and long gone. The Council must get to the 'point of delivery' as soon as possible and have the courage to have all this hard work for which they and the Town Team should be commended for and turn this outstanding Vision into reality for the community's sake that sees each passing year go by with little change prolonging the angst brought about by unfulfilled hope and lost opportunities. To this end HM Government inspector should ratify the AAP giving the regeneration of Bridlington a 'green light' as soon as possible which will be a start to addressing the North, South divide in the under-funding of capital infrastructure projects which now well exceeds £30 billion at the last audit a few years ago.</p>	
E Puremont	AAP	Having viewed the AAP we can only say that the changes cannot happen soon enough. We think the plan is good.	The Council welcomes the support.
East Riding College	AAP	East Riding College, St. Mary's Walk, Bridlington, has just opened its new state-of-the-art campus which offers both 14-19 year old students and adults access to some of the best learning facilities in the East Riding. Although outside of the town centre/proposed marina area, the College feels it has a significant part to play in the regeneration of Bridlington and has been involved in the Renaissance project from an early stage. East Riding College continues to raise educational aspirations and achievements in Bridlington. To complement the proposed plans, the College is able to offer the following services: Vocational education to young people and adults in Bridlington, equipping them with the skills sought by employers within the sectors which will	The Council welcomes the support.

Respondent	Type	Full Representation	Response & Recommendation
		<p>be located in Bridlington as part of the proposed plan. The College offers apprenticeships in construction and the built environment, engineering and business administration and would be keen to work closely with contractors to place young people into apprenticeships during the development of the town centre. After completion, the College can continue to offer apprenticeships in retailing, customer service, leisure and hospitality, amongst others, which will not only provide organisations employees from Bridlington with the skills they need, but also offer employment and training opportunities for young people. In addition, the College offers training to new and existing adult employees to ensure they have first-class skills to enable Bridlington to compete with other towns and offer the type of service expected by residents and visitors. The College also works closely with Job Centre Plus to ensure that unemployed individuals have access to training and qualifications which give them the best possible opportunity to find employment. The facilities offered by the new college build at St. Mary's Walk will complement the proposed facilities in the town centre/marina. The College offers access to its restaurant, hair and beauty and travel shop facilities, together with the option of the use of other rooms and specialist facilities, including out-of-hours services. East Riding College believes the proposed plans would be of great benefit to Bridlington and looks forward to continued involvement in the project.</p>	
<p>East Yorkshire Chalk Rivers Trust</p>	<p>AAP</p>	<p>Some observations regarding the Gypsy Race in respect of the planning document:</p> <p>Page 96 - para 6.36 .. .in respect of the "<i>...where the Race should provide the water feature for a small 'pocket park', providing the possibility of an opportunity to function as a grey water recycling point for the supermarket development.</i>"</p> <p>What does it really mean? How is the Gypsy Race affected?</p> <p>Page 96 - para 6.36 "<i>The Race will then run under Springeld Avenue where it is to be culveted and into the main section of the Park where the Race is to be the Park's centrepiece.</i>"</p> <p>Will planning take into account the risk of litter flowing into the culvert(s) and prevention of such by use of grids?</p> <p>Page 96 - para 6.36 "<i>Where the Race flows into the Harbour (from) the Gypsy Race, there is an opportunity to introduce public art in the form of a more elaborate water feature - e.g., with water engineered to spout out of a fishes mouth into the Harbour.</i>"</p>	<p>The Council notes the comments, but stresses that the AAP is not the vehicle for detailed design issues in respect of the Gypsy Race. Detailed proposals will take into account the matters noted, and will be consulted upon as part of the planning application process.</p>

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		<p>This sounds a great idea and I have included a few pictures to show the concept. Will the water be from the harbour or the Gypsy Race? If the intention is to pump water from the Gypsy Race into the harbour via the proposed water feature will consideration be given to the free passage of migratory fish into, and out of, the Gypsy Race? If this is the case a fish pass may be a requirement.</p> <p>The Proposals Map (All Policies) shows the Gypsy Race entering the Area of Impounded Water separated from the Area of Tidal Water by means of a lock. There is a possibility that the introduction of such a device may effect the movement of migratory fish dependant on the opening frequencies of the lock.</p>	
<p>East Yorkshire Motor Services</p>	<p>AAP</p>	<p>Further to our recent meetings, I write to confirm EYMS's views on the proposals put forward in the draft documents. First as a local business we support the Council's efforts to improve the town centre for the benefit of the local economy, residents & visitors, that form the back bone of this plan, but we have a number of observations on the detail:</p> <ol style="list-style-type: none"> 1. Coach facilities – It is important that pick up /drop off points are separated from bus stops to prevent obstruction to local services. Separate parking should be provided, at a location that is convenient enough to encourage its use & where facilities for drivers can be provided. However it does not need to be in the town centre. 2. Parking for cars should be restricted on town centre streets to avoid obstruction to buses & to reduce the unnecessary traffic movement where drivers drive repeatedly around an area looking for a space. 3. We support the principal of improved bus stops at Bridlington Rail station, but this should not be at the expense of town centre stops & should reflect the multiple combinations of connections that occur at the current bus station. The location of town centre stops needs to reflect the high proportion of elderly & disabled passengers in the town (70% of our town service passengers use concessionary free travel passes), & their need to access local facilities. 	<p>The Council welcomes the support for the AAP's proposals, and notes the comments in respect of coach parking, on-street car parking and access by the elderly.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>
<p>English Heritage</p>	<p>AAP + SA</p>	<p>Thank you for consulting English Heritage about the Area Action Plan for Bridlington. We are pleased to note the recognition within the Report of the importance of the historic environment to the character and distinctiveness of this part of East Yorkshire and welcome the role that it is envisaged the heritage assets of the area can play in helping to deliver the Vision for Bridlington. We welcome the changes that have been made to the document</p>	<p>The Council welcomes the support of English Heritage; the Council has since consulted on and designated a Conservation Area in the part of the town centre noted by English Heritage, and will ensure the appropriate commentary is set out in the final draft of the AAP. The Council hopes this</p>

Respondent	Type	Full Representation	Response & Recommendation
		<p>as a result of our comments to the previous version of the Area Action Plan and, especially, the intention to examine the area around the harbour as a possible Conservation Area. We have the following comments to make on this iteration of the document:-</p> <p>Page 38 - Strategic Objective 5 We welcome the Strategic Objective to create a strategic network of new and enhanced public spaces and pedestrian environments in the town and the measures outline for delivering it.</p> <p>Page 39 - Strategic Objective 6 We support the recognition of the importance of the historic environment and the contribution which it can make towards achieving the strategy for Bridlington and we welcome the inclusion of a specific Strategic Objective relating to the conservation and enhancement of the distinctive heritage of the town and the raising of design standards.</p> <p>Page 41 - Enabling Objective vii We welcome this Enabling Objective which will assist in the delivery of Strategic Objective 6. The protection and enhancement of the town's historic character is a key element in the renaissance of Bridlington.</p> <p>Page 60 - Policy BridTC1 We support the overarching strategy outlined in this Policy particularly Criterion e), relating to the creation of a network of new and enhanced public open spaces, and Criterion (f), relating to the raising of design standards and the protection of the town's historic buildings and their settings.</p> <p>Page 66 - Policy BridTC3 We welcome the recognition within Criterion 4 of the contribution which the reuse of existing buildings (Sub-Criterion (g)) and the safeguarding of the historic environment (Sub-Criterion (l)) make to the environmental sustainability.</p> <p>Page 68 - Paragraph 3.52 We welcome the measures outlined in this Paragraph to ensure that development and change improve the built environment within the Town Centre.</p> <p>Page 69 - Paragraph 3.53 We welcome the intention to assess the town centre core as a possible Conservation Area. If designated, this will assist in the delivery of Strategic Objective 6 and Policy BridTC4.</p>	<p>designation addresses EH's remaining concerns.</p>

Respondent	Type	Full Representation	Response & Recommendation
		<p>Page 69 - Paragraph 3.53 The Area Action Plan should make it clear that if a Conservation Area is designated, the appraisal and subsequent management plan, will be used as the basis of determining the appropriateness of development proposals in that area.</p> <p>Page 69 - Paragraph 3.55 We welcome the measures outlined in this Paragraph to enhance the setting of the Listed Buildings in the Town Centre.</p> <p>Page 70 - Policy BridTC4 We support this policy which will help to ensure high standards of design within that part of the town covered by the AAP and that, where appropriate, schemes will take full account of the context within which they are proposed.</p> <p>Page 70 - Policy BridTC4 There are numerous buildings in that part of the settlement covered by the Area Action Plan which, although not Listed, nevertheless, still make a positive contribution to the distinctive character of the town centre. Until such time as a Conservation Area is designated, these buildings are not protected through the Policies of the Area Action Plan. This Policy should ensure that such buildings are retained, whenever possible. It is suggested that a Criterion along the following lines is added to the Policy:- <i>“the retention of those buildings which make a positive contribution to the distinctive character of the area”</i></p> <p>Page 80 - Policy BridTC6 We support this policy which clearly expresses the considerations which the Council will use in assessing the appropriateness of development proposals.</p> <p>Page 123 - Policy BridTC14 We broadly support the access and movement proposals set out in this policy especially the initiatives designed to reduce the impact of traffic upon the Town Centre, and the measures to improve the setting of Christ Church.</p> <p>Page 131 - Policy BridTC16 We support this policy. The improvement of the public realm within the town is a key element in delivering the town’s renaissance and experience from elsewhere has demonstrated the significant benefits which a high-quality public realm can play in people’s perception of an area and, as a result, the amounts of inward investment it encourages.</p> <p>Page 155 - Policy BridTC17 We generally support the proposals detailed in this policy for the Burlington</p>	

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		<p>Parade development and, in particular, the initiatives to improve the setting of the Listed Buildings in this part of the town.</p> <p>Page 155 - Policy BridTC17 Given the potential scale of work envisaged under this Policy, in order to ensure that the town's distinctive heritage will not be adversely affected, the justification should include reference to the need for the Masterplan and subsequent development proposals to take account of the work undertaken as part of the Conservation Area Appraisal.</p> <p>Page 159 - Paragraph 5.57 We welcome the inclusion of an Objective relating to the need to protect the Listed piers and, where appropriate, enhance their setting.</p> <p>Page 165 - Policy BridTC18 We support the requirement in Criterion 1(e) that development proposals safeguard the character and setting of the Listed piers. These are a distinctive element of the town's character and it is wholly appropriate that attention is drawn to the need to protect, and where appropriate, enhance them.</p> <p>Page 167 - Paragraph 5.75 We welcome the Objectives set out in this Paragraph especially the provision, protection and celebration of key views, vistas and vantage points, including key buildings, and the improvements of the areas which connect the historic core of the settlement to the proposed development area to the west.</p> <p>Page 168 - Policy BridTC19 We support this policy. The improvement of the public realm within the town is a key element in delivering the town's renaissance and experience from elsewhere has demonstrated the significant benefits which a high-quality public realm can play in people's perception of an area and, as a result, the amounts of inward investment it encourages.</p> <p>Page 172 - Paragraph 5.94 We support the Objectives for this area of the town particularly Objective (v) relating to the preservation of the historic buildings in the area and the requirements of Criterion (vi) requiring new developments to respect their historic context.</p> <p>Page 173 - Policy BridTC20 We support this Policy particularly Criterion 2 c) relating to the need for development proposals to preserve and restore the area's distinctive character and townscape.</p>	

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		<p>Table 10.2 We support the Output indicators which have been put forward for monitoring Strategic Objective 6 relating to the town centre's historic character.</p> <p>Sustainability Appraisal Given the nature of the AAP being examined, overall, we would agree with the conclusions reached regarding the assessment of the likely effects which the Preferred Options might have upon the historic environment. For those adverse effects which have been identified, we would agree with the mitigation measures which have been suggested.</p>	
Enterprise Inns	SPD	<p>Ian Foster, Regional Property Manager, Enterprise Inns PLC I attended the Local Authorities Exhibition yesterday afternoon with my Colleague David Eldon who is Enterprise Inns Regional Manager for the Sterling Castle together with Tim Gibson who is our Retailer and operates the premises. Tim has a 30 year lease agreement with Enterprise Inns PLC at the Sterling Castle and has been a business man in the town and local resident for many years. I have attached for your information, a letter he has written expressing his views and concerns surrounding the Marina and Town Centre proposals that we all viewed and discussed with you and your colleagues at the North Library. The main concerns we have are in relation to the height of any buildings that are proposed along the marina front that could obstruct the tremendous views that the Sterling Castle currently enjoys. We feel that any compromise of this view would have a serious effect on our current business. The other issue we have is around any complaints that might be raised by future residents living in or around the Sterling Castle within the proposed new developments as a result of us carrying out our day to day business. The pub has been there for decades and we would not want any new development causing us to restrict out current operation in any way as we feel this would be unfair. I would appreciate it if you could view Tim's letter attached and acknowledge receipt of both his letter and this email. I would also ask that you and your colleagues give due consideration to our views and concerns and request that we both receive a written response from yourselves giving us your interpretation and thoughts on the issues we have highlighted.</p> <p>Tim Gibson, Proprietor, Stirling Castle I am a Bridlington town centre businessman for over twenty two years & I am writing to you with regards to the Bridlington town centre redevelopment plan. I have viewed & discussed the proposals on view at the North Library, with</p>	<p>The Council notes the comments, and has separately acknowledged the letter. The Council cannot, however, make any undertakings re the protection of existing views from individual properties.</p> <p>The Council stresses, however, that it has made every effort to ensure that the proposals minimise the risks of adverse effects for any individual interests while creating the very substantial benefits for the town Centre as a whole that are needed. Enterprise Inns should benefit accordingly.</p> <p>Guidance on acceptable building heights in different parts of the town centre is set out in the SPD; and there will be a chance to comment on detailed proposals at planning application stages.</p> <p>The Council proposes no change to the AAP in response to the comments, and welcomes the continued involvement in the delivery of the proposals.</p>

Respondent	Type	Full Representation	Response & Recommendation
		<p>yourself & your colleges today. I feel I must put my worries & concerns about the development in writing to you. Firstly although I'm bordering the redevelopment on two sides, I have not received any correspondence before hand from the Council about the project. After viewing the proposals I'm even more worried as the drawings on display clearly show substantial developments of many four storey high buildings including flats, immediately in front of my main trading area. I am still curious why I did not receive any correspondence from the council when I have the gardens replacing the public toilets at the front of my business & as mentioned already the substantial buildings to the rear. Could it be that the implications to my long established business was known & this maybe explains why I wasn't informed before? You explained that the buildings wouldn't be that high & that they wouldn't interfere with my current views. But I do not know of any marina redevelopment where high rise flats were not included in the scheme. I would like in writing confirmation that the project will not impinge on my views from my business.</p> <p>Further to the above I would like guarantees that any future development near or around my business will not be able to then complain that they are having problems living near a public house that has been there over decades. I would like to end my correspondence by saying any development to the rear of the Stirling Castle, my main trading area, similar to what I have seen today at the North Library in Bridlington will I feel adversely affect my business.</p>	
Environment Agency	AAP	<p>Whilst we are generally supportive of the document and substantive changes have been made since 2007, there are opportunities for it to more specifically accord with PPS25: Development and Flood Risk, as highlighted in our letter of 7 December 2007. Whilst the areas of high flood risk probability are constrained in Bridlington, significant risks are posed by flooding from Gypsy Race and From the North Sea. Our main issue is that the AAP does not categorically state how it intends to accord with the Sequential Test and the lack of justification as to why our comments and suggestions to policies have not been incorporated since our last correspondence. My detailed comments to address these concerns are as follows:</p> <p>Policy BridTC6 Section 'g' of this policy must be amended to read flood risk avoidance then mitigation; this is line with the Sequential Test required by PPS25.</p> <p>Section 3.77 Please refer to the Sequential Test rather than the Sequential Approach at this stage. This should read 'National flood risk policy puts in place two formal</p>	<p>The Council aims separately to agree with the Environment Agency the changes to the AAP needed to ensure its policies are fully in accord with PPS25 – in line with the EA's comments on the Second Preferred Options Draft.</p> <p>The Council also stresses that AAP is a regeneration strategy for the Town Centre, and therefore a fundamental aim is to make beneficial use of land in the core of the Town Centre for uses for which there is demand and which will enhance the competitiveness of the Town Centre both as the service core of a Principal Town and seaside town dependent on visitor spending (i.e., a tourism destination). Land that is under-used or ineffectively used drags on the performance of the Town Centre; and therefore a key regeneration</p>

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		<p>processes for deciding the types of development which may be acceptable in areas of flood risk: a sequential test' etc.</p> <p>Policy BridTC17 Parts of the proposed Burlington Parade development scheme are identified as being at high risk from flooding, either from Gypsy Race or from the North Sea. Given that large scale development is proposed, the policy must insert a section on flood risk and a general commitment to avoiding flood risk areas through a sequential approach. This could involve the siting of public open space, play areas and other water compatible uses in flood risk areas, with less vulnerable and more vulnerable development kept away from those areas. In our previous response we suggested a policy wording. This has not been inserted. We would strongly suggest the following is incorporated within this policy: "A Sequential Approach to the design and Layout of the Burlington Parade development will be taken. This will include the overall avoidance of development within flood zones 2 and 3, where possible. In flood zones 2 and 3 preference will be given to water compatible uses, whereas more vulnerable development will not be permitted".</p> <p>Policy BridTC18 One of the major compelling issues to affect the Bridlington AAP area is flooding. We advised in our previous response that flood risk should be tackled comprehensively. We feel this policy wording should be changed as highlighted for the Burlington Parade. The policy wording should read: "Parts of the proposed Marina development Scheme are identified as being at high risk from flooding, either from Gypsy Race or from the North Sea. Given that large scale development is proposed, the policy must insert a section on flood risk and a general commitment to avoiding flood risk areas through a sequential approach. This could involve the siting of public open space, play areas and other water compatible uses in flood risk areas, with less vulnerable and more vulnerable development kept away from those areas. In our previous response we suggested a policy wording. This has not been inserted. We would strongly suggest the following is incorporated within this policy: "A Sequential Approach to the design and Layout of the Marina development scheme will be taken. This will include the overall avoidance of development within flood zones 2 and 3, where possible. In flood zones 2 and 3 preference will be given to water compatible uses, whereas more vulnerable development will not be permitted".</p> <p>Policy BridTC19 A number of sections of the sea front are identified as being in areas of high</p>	<p>objective has to be to remove these drags where they help 'cause' the underperformance. Therefore, in line with PPS25, paragraph 7 (4th bullet), these other spatial planning considerations have been taken into account alongside flood risk in taking a Sequential Test approach to allocating sites for development. Nonetheless, the Council acknowledges fully the value of avoiding flood risk where possible to realising the regeneration objectives for the Town Centre (and where not possible to minimising and managing it).</p> <p>[The Strategic Flood Risk Assessment 2010 shows that the area of flood risk is considerably smaller, particularly around the Gypsey Race than the flood risk information previously available.]</p>

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		flood probability. Because these are relatively constrained, opportunities should be explored to set back new developments outside these areas. This will help to provide natural protection against flood events.	
ERYC Legal	AAP	<p>Brid TC16: s106 Contributions</p> <p>In practice although a planning obligation should be secured at an earlier stage, payment is more reasonably required on commencement of development rather than grant of permission. In some cases development with the benefit of full planning permission will not proceed for a variety of reasons, not all of the developer's making.</p>	The requested change will be made.
G Cunningham	AAP	<p>Reasons for town centre development – NONE. Reasons against:</p> <ol style="list-style-type: none"> 1. Too large a development for town population. 2. Decentralisation of bus station, people do not want to walk too far 3. Moving of Hilderthorpe car park to Wilsthorpe – visitors do not want to be dumped that far out of town. 4. Proposed number of multi-storey car parks – make better use of what you have already got. 5. Money would be better spent a) cleaning seafront walkways, paths and pavements around the town centre b) the beck (Gypsy Race), lovely picture in exhibit, reality – a murky dump and mess with little flow of water, not a pleasant sight c) blinkered view some people take of the town centre – tilt your head up 45 degrees and you will see another eyesore – buildings that have been neglected and require maintenance i.e. painting and removal of bird excrement could be money well spent. 6. Retail units in the shopping centre – there are at least 9 units empty and around the town in general there are many more – people will only use these units to sell and make a profit which is difficult if the rates etc. are high – you do not require any more empty retail units. 7. Regarding gardens and seating areas – there are plenty of these already – develop these and make the public more aware of where they are. 8. Generally there is nothing wrong with what you have got, it wants a good clean and maintaining – updating where and when necessary. 	The Council notes the comments and welcomes the interest in the AAP, but proposes no change in response. The Council stresses that the AAP's proposals are, in each instance, supported by robust evidence; have been consulted upon throughout the AAP's preparation; and at each stage the comments have been taken into account by the subsequent stage where justified on the evidence.
G Sykes	AAP	Even in winter it takes a lot of time to cross Brid. from north to south, with many roads being congested. From reading your Transport Summary, I cannot see how closing Bridge Street, Manor Street & Queen Street and limiting traffic on Springfield Road can do anything but make matters worse. You seem to be putting all the traffic through Beck Hill which, having steep slopes at both ends	The Council notes the comments, but stresses that all of the movement proposals have been subject to detailed modelling work. The Council can reassure that the changes proposed, as a package, will both improve traffic flows and

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		<p>is not ideal for vehicles waiting at traffic lights. Will you please explain:-</p> <ol style="list-style-type: none"> 1. How the closure of roads can do anything other than cause more traffic jams. 2. Where the traffic at the south end of Promenade is meant to go. 	<p>ensure the town centre can accommodate the additional activity needed for its regeneration and year round competitiveness.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>
G Vanead	AAP	<p>The AAP does not include parking and drop-off points for coaches. Coaches in the future will still be important as fuel prices continue to rise.</p>	<p>The AAP provides for coach pick up and drop off, and some limited parking; operators have been consulted and they are content with the proposals.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>
Government Office for Yorkshire and The Humber	AAP	<p>1. Thank you for consulting the Government Office on the second version of the Preferred Options Draft of the Bridlington Area Action Plan. We have a few comments as follows.</p> <p>General Comments</p> <p>2. The document is comprehensive in its presentation of consultation results, assessment of responses, background evidence and way forward, possibly too much so. (I note we made similar comments regarding length on the previous Preferred Options consultation document). There is a lot of background and descriptive text/justification for each policy and each area. Policy TC17, for example, has 15 pages of supporting text. It also seems to be repetitive, particularly the analytical and evidence base discursive material. This tends to make the document very lengthy, difficult to read, cumbersome and not 'attractive' to the local people the authority should want to engage. The PINS Document 'Local Development Frameworks: Lessons Learnt Examining DPDs' states that 'One of the aims of the new system is to produce concise documents. This aim is frequently being undermined by the practice of providing excessive detail about the justification for a policy or approach being adopted' (paragraph 3.14). To some extent this issue should correct itself since some of the material, such as that relating to consultation feedback and progress made, will not need to appear in the face of the Publication document itself. But you will want to consider how it could be slimmed down or rationalised in any way to produce a more succinct and easily understood final document.</p> <p>3. This AAP is due for publication and submission before the Core Strategy</p>	<p>The Council thanks GOYH for the comments and proposes the following changes in response:</p> <ol style="list-style-type: none"> 1. Restructure the AAP so that the strategy comes first in the document, so development management policies are grouped in a single section and unnecessary detail is removed. 2. The Council proposes to clarify the relationship with the Core Strategy and explain the consistency with it, and to stress that the strategic context for the proposals, pending the Core Strategy, is provided by the RSS. 3. Provide full details of the delivery plan are included together with the details of the monitoring proposals. 4. Provide more detail as to how the Plan provides for contingencies and builds in needed flexibility. The Council has also taken the advice of a senior Planning Inspector (a 'front-loading' visit) who is content that the AAP promotes a specific strategy on the

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		<p>and so the Core Strategy is not establishing the chain of conformity for this document. It should be made clear, therefore, that conformity at this stage will be to RSS and/or saved policies with reference to its place in the emerging Core Strategy.</p> <p>4. A clear picture of the Monitoring and Implementation Framework is needed, for example who will be delivering this; who has key responsibilities; who is committed to the programme; what the means of delivery will be. Output indicators as used in Table 10.1 following page 191 (it would be useful if pages were numbered through to the end) contribute to only one part of delivering and monitoring.</p> <p>5. The soundness tests also relate to flexibility to deal with changing circumstances. Options should have an element of flexibility to address changing or unforeseen circumstances, such as major investors pulling out. At publication/submission there will need to be built in contingencies for identify the circumstances in which there would be a need to revise the document. In this context, we note that a full risk assessment is to be prepared for publication(page 191, paragraph 6.65). Clearly this could be even more important given the current economic/market conditions .</p> <p>More Specific Comments</p> <p>6. Page 4, paragraph 10: You propose to call the final version of the AAP, ie the Publication document under Regulation 27 of the 2009 LFD Regulations, the 'Submission Draft'. I think this proposed title will be rather misleading since it suggests that it is still a working document that is liable to potential change. It also seems inherently contradictory. You should be clear that the underlying premise should be that the plan is considered sound by the council at the time it is published. Publication of the DPD is therefore not meant to be an additional requirement to undertake public consultation (which, by definition, is not possible on a 'final' document). The purpose of the regulation is to gather representations on the soundness of the DPD that is to be submitted to the SoS, to be examined as part of the submission material. Any potential changes following publication should be very minor, i.e. editing to improve legibility or to ensure it is up to date, and not requiring further consultation. These minor changes could be attached as a schedule to accompany the DPD on submission, and the Inspector would be asked to consider recommending these changes in his report.</p> <p>7. Page 33: The vision, along with the strategic objectives, should describe what the area should be like in the future and begin to articulate how this can be achieved. At 11 words long, the AAP's vision seems more like a strap line,</p>	<p>evidence, and the preferred approach must be in the AAP itself (that additionally to promote less preferred alternatives would defeat the purpose of the strategy). Instead, the Inspector advised that the Monitoring proposals should include 'triggers' that, if not met, suggest alternative tactics may need to be deployed. The Inspector accepted that to set these, by definition, less optimal alternatives in the AAP itself would be counterproductive to the delivery of the preferred strategy.</p> <p>5. The plan will also be supported by a full delivery report that includes a risk assessment.</p> <p>6. Provide further commentary on the vision to bring it to life.</p> <p>7. Provide further clarification on the assessment of developments that are unforeseen but could pose a risk to the delivery of the AAP's priorities.</p> <p>8. Remove the development management policies that are not wholly 'local'.</p> <p>9. Work closely with the Environment Agency to ensure conformity with PPS25, with the aim of agreeing detailed wording in the Publication Document prior to publication for representations on the AAP's soundness.</p> <p>The Council has, in preparing the AAP, worked closely with stakeholders and continues to do so.</p>

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		<p>or headline. The bullet points which follow in paragraph 2.6 provide a commentary or analysis rather than expanding on it to provide a picture of how the area will spatially develop, whilst being realistic and deliverable.</p> <p>8. Page 73, paragraph 3.67: How will 'particularly significant or contentious development' be implemented? Will guidance on a definition be provided or will it be considered on case by case based on officer judgement?</p> <p>9. Page 75, paragraph 3.72: If the full requirements of the detailed planning requirements in policy TC6 are set out in other policies, is TC6 actually needed?</p> <p>10. Pages 77-79: clearly it will be important to gain the support of the relevant stakeholders, notably the Environment Agency in respect of your approach to flood risk</p> <p>11. Page 98, Policy TC10: an unfortunate typo in second line of paragraph 2 of the policy – 'daft AAP' should presumably read 'draft AAP'.</p> <p>12. I hope you find these comments helpful. As ever, we would be happy to discuss the comments and any other issues with you.</p>	
<p>Health and Safety Executive</p>	<p>AAP</p>	<p>The Hazardous Installations Division of the HSE has not considered the contents of the plan in detail on this occasion, however the following general comments are made as we find them applicable in most cases. Department of the Environment, Transport and the Regions, Planning Policy Guidance Note 12: Development Plans paragraphs 6.22 and 6.23 state:</p> <p>6.22 Council Directive 96/82/EC (the Seveso II Directive) which entered into force on 3 February 1999 requires Member States to ensure that the objectives of the Directive - the prevention of major accidents involving hazardous substances and limiting their consequences for man and the environment - are taken into account in their land use policies. This is to be achieved through controls on the location of new establishments at which hazardous substances are present or are likely to be present; controls on modifications at existing establishments where hazardous substances are present, and controls on new developments in the vicinity of existing establishments where hazardous substances are present. It also requires Member States to ensure that their land use policies, and the procedures for implementing them, take account of the need in the long term, to maintain appropriate distances between establishments where hazardous substances are present and residential areas, areas of public use and areas of particular natural sensitivity or interest. These obligations have been implemented by the Control of Major Accident</p>	<p>The Council is aware of no hazardous substances in the AAP area, but undertakes to ensure that this is the case.</p>

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		<p>Hazards Regulations 1999.</p> <p>6.23 In preparing or amending development plans, local authorities will therefore need to ensure that they include a policy or policies relating to the location of establishments where hazardous substances are used or stored, and to the development of land within the vicinity of establishments where hazardous substances are present. If such a policy statement is not included in your plan, the paragraphs in the attached Annex could form the basis of such a statement, which may avoid the submission of planning applications containing inappropriate proposals.</p> <p>There may be a conflict between the development policies and the presence of any hazardous substance establishments or major accident hazard pipelines within the plan area. In your role as the Hazardous Substance Authority under the Planning (Hazardous Substances) Act 1990 and the Planning (Control of Major-Accident Hazards) Regulations 1999 and previous legislation, you should be aware of the location of these. Any proposals for developments should take their presence into account. You are strongly advised to consult the hazardous pipeline operators, to confirm the exact location and route of their pipelines in the area covered by the plan and to ensure that your records are kept up to date. In addition, we suggest that the proposals maps be marked to show the locations of the dangerous substance establishments and hazardous pipelines.</p> <p>If you are aware of any significant development proposal within the plan which may be in conflict with the general policy mentioned above we would be pleased to consider such cases individually.</p> <p>ANNEX Suggested General Statement on Dangerous Substance Establishments</p> <p>Certain sites and pipelines are designated as dangerous substance establishments by virtue of the quantities of hazardous substance present. The siting of such installations will be subject to planning controls, for example under the Planning (Control of Major-Accident Hazards) Regulations 1999, with the objective, in the long term, to maintain appropriate distances between establishments and residential areas and areas of public use. In accordance with DETR Circular 04/2000. the Local Authority will consult the Health and Safety Executive, as appropriate, about the siting of any proposed dangerous substance establishments. The area covered by this Local Plan already contains a number of dangerous substances establishments and major accident hazard pipelines. Whilst they are subject to stringent controls under</p>	

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		<p>existing health and safety legislation, it is considered prudent to control the kinds of development permitted in the vicinity of these installations. For this reason the Planning Authority has been advised by the Health and Safety Executive of consultation distances for each of these installations. In determining whether or not to grant planning permission for a proposed development within these consultation distances the Planning Authority will consult the Health and Safety Executive about risks to the proposed development from the dangerous substance establishment in accordance with DETR Circular 04/2000.</p>	
<p>Hull and Humber Chamber of Commerce</p>	<p>AAP</p>	<p>1. Background 1.1. Hull & Humber Chamber of Commerce is the collective ‘voice’ of business in the Humber sub-region, representing over 1,500 companies. Membership includes 76% of the top 100 companies in the sub-region with over 250 employees. However, the majority of members are small and medium sized firms, with over 20% of all VAT registered companies with between 5-250 employees in the Humber in Chamber membership.</p> <p>2. General 2.1. We welcome the publication of the Second Preferred Options Draft Bridlington Town Centre Area Action Plan and the opportunity to comment on it. We support the work the Council and partners have done since the publication of the first draft in 2007 and have been grateful for the updates provided at our quarterly members’ meetings in Bridlington. 2.2. We are disappointed that the timescale for the delivery of the AAP has been extended from 2016 to 2021, although we understand the reasons for this. However, we would like to emphasise the importance of ‘quick wins’ to help maintain business and public confidence in the regeneration process. While some of the plan will inevitably take many years to deliver, we feel that it is vital that it is seen as an ongoing process with demonstrable outcomes rather than a distant aim. In this respect, the current works on transport are very welcome.</p> <p>3. Local business involvement 3.1. We feel it is important that the local business community continues to be involved throughout the process and is consulted further as developers are shortlisted and more detailed plans are drawn up. 3.2. Where practical, the Council should ensure that contract sizes are not so large that they prevent local companies from bidding for them, and promote any opportunities to local businesses as much as possible. 3.3. By their nature some of the developments will be too large for local firms to</p>	<p>The Council welcomes the Chamber’s comments and support, and respond to each comment with reference to the Chamber’s paragraph numbers:</p> <p>2.1 The AAP has benefited from the participation of the Chamber and its members, and the Council extends its thanks.</p> <p>2.2 The Council appreciates the Chamber’s understanding of the reasons for extending the delivery timetable, and agrees that early wins are important to maintain momentum and confidence. Transport , the works in relation to the Spa and the public realm improvements are examples and the Council is pleased the Chamber acknowledges these.</p> <p>3.1-3.4 The Council welcomes the continued involvement and will continue this through the processes of developer procurement and securing planning consents. The Council is committed to ensuring contracts are of a scale that will permit local firms to bid for them. The Council will consider monitoring sums expended on local firms as one of the monitoring indicators; local job creation is already a key indicator for monitoring the AAP’s benefits.</p>

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		<p>complete on their own, but it is essential that a real commitment is shown to using local suppliers and sub-contractors. While accepting there are limits to what the Council can do, we would expect it to encourage its development partners to use local (Bridlington) companies wherever possible.</p> <p>3.4. To help maintain the confidence of local businesses, we believe the Council should monitor the amounts spent with Bridlington, East Riding and Yorkshire & Humber companies, including by its main contractors, and regularly report on these figures.</p> <p>4. Commercial premises</p> <p>4.1. We agree that there is a shortage of well-specified office accommodation in Bridlington, particularly in the town centre, and support the view that the town centre should be the preferred location for such developments. In some cases it may be appropriate for the Council to target accommodation at particular types of business to encourage them to locate firstly within Bridlington and secondly together; for example, by providing managed office accommodation with high-specification communications infrastructure and tailored business support with partners to attract digital/creative start-ups.</p> <p>4.2. We agree that larger-sized retail units are required to attract major multiples, but we feel it is important that these are designed and located in such a way that shoppers will not be discouraged from visiting other businesses within the town centre during the same trip. For example, the Council should require that the associated car parking is not solely for the use of visitors to those units (i.e. shoppers could walk off site to visit other nearby shops), as with the new Tesco in Beverley.</p> <p>4.3. We would support the proposed development of a new, larger supermarket, as having a choice of good supermarket provision is important for making the town a desirable place to live and discouraging residents from shopping elsewhere. However, as above, the development must encourage shoppers to visit other local businesses as well.</p> <p>5. Design issues</p> <p>5.1. Retaining the character of Bridlington and keeping it different to other towns will be fundamental for its future success, so we would support the Council in requiring high design and build standards from developers through the planning process. This could include both contemporary architecture and buildings designed to be consistent with their surroundings.</p> <p>5.2. We agree that public realm improvements in the town centre are necessary and will be important for delivering the overall strategy. High quality will be important here as well, and where appropriate the improvements should also help to maintain the character of the town.</p>	<p>4.1-4.3 The Council welcomes the Chamber's acknowledgement of the accuracy of the evidence in support of the proposals for offices, a relocated and extended supermarket and a concentration of new, larger, unit shops. The locations of these are proposed with the aim of ensuring that the Primary Shopping Area functions as a single integrated entity; the proposals for parking have the same object – of serving the town centre as a whole.</p> <p>5.1-5.3 The Council welcomes the support for the approach to design. The Council agrees that it is critical that the design of all new schemes is appropriate to Bridlington's particular character, and is of suitably high quality.</p> <p>6.1-6.4 The Council welcomes the comments on the economic purposes the AAP's proposals. The Council is pursuing a strategy of temporary uses for properties acquired to assemble the Burlington Parade site where the repair costs can be justified to allow their temporary re-occupation; in many cases, the Council has agreed lease-back arrangements. One of the key aims of the AAP strategy is to develop a larger and more competitive small business base for Bridlington – and will resist where it can approaches to the letting of property that could compromise local competitiveness.</p> <p>6.5-6.8 The Council welcomes the Chamber's support for the AAP's proposals for the evening economy, for promoting water sports, supporting the conference market and for a Marina.</p>

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		<p>5.3. Movement around the retail circuit should be possible year-round and in all weather. This may necessitate the construction of more covered areas to facilitate movement in the winter months. If not, we are concerned that shoppers during winter may limit many of their visits to the new multiples located close to covered car parking.</p> <p>6. Expanding Bridlington's economy</p> <p>6.1. Delivering regeneration necessarily includes the purchase of existing properties to parcel up development land. However, it is important that these properties do not fall into disrepair and preferably continue to be used. If not, an area could deteriorate and the remaining businesses could struggle. We would like to see the Council do more to encourage 'meanwhile' uses, such as offering the properties on short-term leases at low or zero rent to start-up businesses, if necessary after conducting basic cosmetic refurbishment to make them usable.</p> <p>6.2. Attracting inward investment will be necessary to deliver a large number of the new jobs Bridlington needs, but for the regeneration of the town to be truly sustainable we feel it is important that new and existing local businesses are given support to create jobs as well. As well as ensuring that they are not put at a disadvantage, this would also keep more of the returns on the investment local and encourage further reinvestment that a national multiple store owner, for example, would be less likely to make.</p> <p>6.3. There is an obvious link between points 6.1 and 6.2, in that with the right support a new generation of local small businesses could be established in disused properties at low risk to the people involved, who could then move on to other premises when development commences.</p> <p>6.4. It is important that redeveloped areas are not 'off limits' to local businesses because of high rental costs. We would like the Council to investigate whether the policy of requiring new housing developments to contain a proportion of 'affordable' housing could be transferrable to commercial property developments. By their nature some of the largest units the town needs may be difficult for local independent companies to afford, but we would like to see an appropriate mix of sizes to avoid the town centre being split into two, with large multiples at one end and independents at the other.</p> <p>6.5. We support the proposals for the evening economy and would like to see this further developed.</p> <p>6.6. We agree that there is great potential for developing the town's economy through promoting the area as a destination for water sports.</p> <p>6.7. We support the Council's desire to increase Bridlington's share of the conference and events market, led by The Spa, and agree that there is a need for new, high-quality hotel accommodation.</p>	<p>7.1-7.2 The Council notes the Chamber's views on Leisure World and will take account of these in reaching a decision on how best to proceed.</p> <p>8.1-8.6 The Council notes the Chamber's views of the proposals for parking, and can reassure that the Chamber will be fully consulted on the Traffic Regulation Orders that will be required to put the proposals into place. The Council's aim is to create the best possible operating conditions for the town centre's businesses, which includes ensuring that all of the centre's users enjoy a safe and attractive environment and easy access by a choice of modes of transport.</p> <p>The Council proposes no changes to the AAP in response to the comments.</p>

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		<p>6.8. We continue to support the development of a marina, which will regenerate the Harbour area and attract new visitors to the town. It is important that existing Harbour users are not disadvantaged by the new marina and are fully accommodated throughout its development.</p> <p>7. Leisure</p> <p>7.1. We support the redevelopment of Leisure World to provide a modern, high-quality leisure facility for residents and visitors.</p> <p>7.2. We note the comments from Bridlington Town Council that Leisure World should be redeveloped to offer an Olympic-sized swimming pool. We support the aspiration of bringing an Olympic-sized swimming pool to Bridlington, but we believe that the replacement Leisure World facility should primarily be for 'fun' use, as it must cater both for residents and for leisure visitors. Having a suitable indoor water attraction would help to keep visitors who have come to Bridlington for the beach and sea in the town for longer when the weather deteriorates. A swimming pool designed for hosting professional swimming competitions would not meet this second need. Were the site big enough to accommodate both uses we would support this, but failing that we believe it would be more appropriate to cater for 'fun' swimming on the Leisure World site and consider the development of an Olympic-sized pool elsewhere if that is viable.</p> <p>8. Transport and parking</p> <p>8.1. We support the package of transport improvements, and in particular the proposals to take through traffic out of the town centre and the ongoing construction of the park and ride facility.</p> <p>8.2. While supporting the Council's overall approach to parking in the town centre, we would like to emphasise the importance of ensuring there is sufficient provision for businesses whose staff require the use of their cars, for example for visiting clients. The Council should use the permit system and set aside parking areas specifically for commuters and business users, on a per-business unit basis, to allow businesses the flexibility they need to continue to locate in the town centre while still having easy access to their vehicles. This must be done through a meaningful consultation with businesses in the town. Taking the wrong approach would put at risk the aspiration of locating more office-based businesses in the town centre. Specifically, we feel that the needs of business users should be included within policy BridTC15.</p> <p>8.3. In general we support the switch away from on-street parking within the town centre, but it is essential that this does not discourage residents from using the town centre. The charging structure for short-stay visits will be critical for this, and should replicate the current situation that allows a short period of</p>	

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		<p>free parking for shoppers. Charges should also be flexible to encourage people into the town centre at off-peak times, in particular to help the development of the evening economy.</p> <p>8.4. We feel that the suggestion that parking may be allowed in the evening in certain areas where parking is restricted during the day is a good one that may help the evening economy. We suggest that all parking arrangements are closely monitored, with a view to potentially allowing daytime parking in some of these areas during the winter months when congestion is less of an issue and the full park and ride service is not in operation.</p> <p>8.5. Given the nature of Bridlington's population and visitors, we feel it is important to maintain an adequate number of disabled parking spaces close to shops. Whatever the quality of the proposed decked car parks, it is unlikely that some disabled visitors would want to use these.</p> <p>8.6. We note that the Council proposes to consult further on car parking charges and provision. We feel it is important that this is a transparent process that fully involves the business community, in contrast to the recent East Riding-wide parking review, and look forward to participating in it.</p>	
J Fleeman	AAP	<p>Could the pay facilities for parking be arranged so that one drives into the car park through a controlled barrier and collects a card and pays on exiting the car park, rather than paying for X numbers of hours when one parks the car.</p>	<p>The Council will keep this option in mind when it comes to the detail of the operation of the new car parks.</p>
J Hale	AAP	<p>I think this will be great for Bridlington, much needed investment. It will create an attractive shopping area and cleaner streets as well as providing views of the best aspect of Bridlington, the sea, from most of the town. I like the public squares, the gypsy race corridor and the focus on pedestrian access. Providing housing within the town centre will keep a buzz in the centre all year around. As well as providing customers for the town's new businesses. The multi-storey car parks are much needed and will reduce traffic as people will not have to drive around and around searching for a parking space. I think they will be used as the walk form the car park to the shops and harbour will be enjoyable with all the planting and pathways.</p>	<p>The Council welcomes the comments in support of the AAP's proposals.</p>
K Kaye	AAP	<p>Overall the Plan is exciting and if completed would be a tremendous change for Bridlington however there are some issues arising from this draft.</p> <p>1. The removal of the amusements from the seafront area could remove the raison d'etre for many people visiting Bridlington. The proposal to relocate to the south shore in the vicinity of the park and ride could create a new</p>	<p>The Council welcomes the overall support and responds to the specific comments as follows:</p> <p>1.-2. There are no immediate proposals to relocate the funfair. The Council's concern</p>

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		<p>community resulting in the town centre suffering a dramatic reduction in footfall.</p> <p>2. The effect of closing the town centre by a combination of changes to traffic flows and the relocation to the south of the town of the funfair operators could have the effect of making the town even more attractive to retirees and second home owners particularly with the new residential areas in the Gypsy Valley</p> <p>3. The town square proposal appears to be an unnecessary step as we already have a large unused space in King St ideal for such a purpose.</p> <p>4. How is a bus route going to operate through King Street on Market Days? Indeed what is the plan for the charter market within these options?</p> <p>5. The traffic flows across and around town appear to obviate freedom of movement from north to south particularly along the promenade. There could be a danger of isolating the town to the point of failing to realise the retail potential which is such a key part of the Plan.</p> <p>6. There is insufficient evidence as to how the plan will realise the growth in economic development. Scarborough to the north and Hull to the south feature much more strongly in regional development plans and from a business point of view have much better rail links (and in the case of Hull road links) with the rest of the UK.</p> <p>7. Improvements to Hull – Scarborough rail and bus services and in particular the development of the transport interchange and St Stephens in Hull makes an attractive and sustainable option for local shoppers.</p> <p>8. The plan seems to want to steer Bridlington away from being a tourist economy despite the recent investments in the Spa, the park and ride, the proposed revamp of Leisure World and the development of the Marina. All of which the council leader believes will ensure the future of Bridlington as a tourism centre which appears to be contrary to the way in which the Plan is written.</p> <p>9. Given all the factors that affect coastal towns including the current economic situation it is inconceivable that the plan can be developed as one and that piecemeal development will be necessary. The phased release of development land is therefore of paramount importance and the proposals on this need to be given urgent consideration.</p> <p>10. The Plan if achieved will dramatically change the urban appearance of the town. However I am unconvinced that it will bring real change to the economic and social fabric of the town. That will be heavily dependant on a rate of private investment the likes of which the town has not seen since the 1970's.</p> <p>11. We need a stronger economic development plan including tourism impact to realise the benefits of regeneration. At the moment Bridlington is on the fringe of regional and area development plans. Some of the planned overall</p>	<p>is to ensure the whole community, as well as Bridlington's visitors, are able to enjoy an attractive and 'open for business' Town Centre Seafront all year round.</p> <p>3.-5. The Council will consult on the detail of the traffic management proposals when it makes the necessary Traffic Regulation Orders. There are not any specific proposals for changing the market, although the Council welcomes suggestions.</p> <p>6.-8. The AAP is focused heavily on economic development (indeed, this is its entire purpose) – through improving the competitiveness of the shopping and leisure offer, in supporting the Spa, in promoting the Marina, in capturing higher proportions of local resident and business spending, in promoting the development of small offices, in re-focusing the tourism offer on a higher spending, year-round, markets while still retaining its seasonal markets, and overall creating a more diverse, and more competitive, local economy. The AAP is promoting the diversity of the Bridlington economy – something that is critical alongside a more diverse, year round, tourism offer. The AAP's evidence base sets out the factual basis for the AAP's tactics.</p> <p>9.-11. Development opportunities will be phased, but to masterplan and development briefs that avoid the risks of piecemeal development. The Marina is a major tourism proposal (as has been the investment in the Spa).</p>

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		investment including regeneration needs to go into improved access and at least one major tourism development. A final chance to capitalise on the redevelopment of Leisure World perhaps?	
L Chambers	AAP	Have been advised by local residents of their major concerns regarding lack of on street disabled parking and free short term on street parking for residents when wishing to access their bank or use butcher, cobbler etc. Brid has a large elderly and disabled population and all consideration must be given to them- they perceive that holiday makers enjoyment of a car free town centre are being prioritised above them (the council tax payers) who live and shop here full time.	The Council is taking full account of the needs of all the users of the town centre, including the mobility impaired. All of the evidence shows that the interests of the town as a whole will be best served by a much more appealing pedestrian and trading environment in the town centre. Disabled parking will continue to be provided.
Local Government Yorkshire and Humber	AAP	Thank you for consulting the Regional Planning Body on the AAP. On this occasion the RPB will not be forwarding any detailed comments. If you have any queries about the RPB and its relationship with Local Development Frameworks, please do not hesitate to contact us.	The Council notes the comments.
Lords Feoffees	AAP + SPD	<p>1.0 INTRODUCTION</p> <p>1.1 This Report has been prepared on behalf of the Lord Feoffees and Assistants of the Manor of Bridlington to amplify their representations to the Second Preferred Options Draft Bridlington Town Centre Area Action Plan (AAP) and the draft Bridlington Supplementary Planning Document (SPD). The Report sets out in detail the Lord Feoffees and Assistants concerns about the proposals for the town centre and, in particular, the Burlington Parade Redevelopment scheme.</p> <p>1.2 The Lords Feoffees and Assistants of the Manor of Bridlington is a charitable trust which was created in 1636. More than three hundred years on, the Lords continue to fulfil their original charter by generating income and donating money to worthwhile causes in the town. This includes the funding, over a number of years, for three inshore RNLI lifeboats and the funding of over 60 annual scholarships for both A-Level and University students from Bridlington. Funding for these donations is generated primarily from rent received from commercial and residential properties owned by the Lords and from car parking fees in the town centre.</p> <p>1.3 The Lords are one of the largest property owners in the town and, therefore, have a significant interest in the policies and proposals set out in the draft AAP and SPD. In particular, the Lords, Beck Hill car park is identified within the AAP and SPD for development as part of the Burlington Parade</p>	<p>The Council welcomes the Lords Feoffees' support in general for the purposes of the AAP and, as the Lords note, has consulted with them throughout the AAP's preparation.</p> <p>The Council responds to the specific points as follows:</p> <p>1.1-1.8 The AAP necessarily promotes the health and vitality of the town centre as a whole; achieving much-needed improvements in the town centre's competitiveness necessitates changes that cannot avoid effects on the Lords' properties. These changes will produce benefits in the trading position of the Lords' tenants – as well as benefits for the trading position of all the town centre's businesses and their customers. One of the key requirements is to improve the share of catchment spending captured by local businesses, which in turn requires the introduction of more of the sorts of retailers</p>

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		<p>Regeneration Scheme. The Plan proposes that the Beck Hill car park would be redeveloped to provide frontage development to the Gypsy Race and a two deck car park. Beck Hill itself would also be straightened which would involve the acquisition of some of the Lords land. As well as affecting the Beck Hill car park itself, the proposals would adversely affect the Saw Mill Yard area.</p> <p>1.4 The proposals for Beck Hill are contrary to the Lords own proposals for the construction of a multi-storey car park at this location. There is a need to increase the amount of car parking at Beck Hill to meet the needs of the Lords tenants (and their customers) within the town centre. In addition, the multi-storey car park would generate additional income which the Lords, as a charitable trust, could devote towards the funding of the worthy causes in the town.</p> <p>1.5 The Lords are also concerned that the proposals set out in the draft AAP and SPD will have a detrimental impact on their existing commercial and residential units in the town centre and, in particular, those fronting Manor Street. The current Beck Hill car park provides spaces for users and occupiers of many of the Lords town centre properties and if the car parking is lost or reduced the Lords are concerned that the premises will not be as economically viable. In compliance with planning policy, the Lords have been particularly successful in providing residential accommodation over commercial uses in the town centre. The success is, however, very much dependent on the Lords ability to provide car parking in close proximity to the properties for the use of tenants.</p> <p>1.6 The Lords are actively involved in the planning process having engaged in consultation with the East Riding of Yorkshire Council concerning the future of the Beck Hill car park and the Burlington Parade Redevelopment Scheme. Although the Lords support the regeneration of the town, and have been working with the East Riding of Yorkshire Council to progress an acceptable scheme, the contents of the AAP and SPD do not reflect the content of these discussions.</p> <p>1.7 Having regard to the above, this Report provides a context to, and details, the Lords representations to the various policies and proposals contained within the AAP and SPD. In summary, the Lords have a number of concerns regarding the content of the AAP and SPD as follows:-</p> <ol style="list-style-type: none"> 1. The plans for Beck Hill ignore the discussions that have been held with the Lords. 2. The plans will compromise the Lords ability to improve the Beck Hill car park and to generate income for the 'worthy causes'. 	<p>that shoppers go elsewhere to find. This in turn requires an approach to extending the established Primary Shopping Area in ways that will benefit existing businesses. To do this, the AAP proposes the creation of a new 'anchor' (a concentration of modern unit shops that will draw additional trade to the Town Centre) on the site of the existing Tesco store, with the main part of the new Primary Retail Circuit to run between it and (include) the Promenade precinct/Chapel Street/King Street area along the part of Manor Street owned by the Lords. Thus, the businesses on this street, including the Lords' tenants, stand to gain from significant increases in footfall across their trading frontages (as well as from increased patronage of the Town Centre as a whole). Accommodating the new anchor requires changes in the way the Town Centre is accessed and serviced with parking. This in turn requires that Beck Hill be straightened and upgraded, so that Spring Bank can be downgraded so as not to sever movement between the new anchor and the rest of the Primary Shopping Area. The Council offered to work with the Lords to find a solution to the creation of a decked car park on the Lords Feoffees' land which would both meet the Lords' objectives and permit, rather than confound, the wider plans for the regeneration of the whole of the Town Centre.</p> <p>2.1-2.15 The AAP's proposals are backed by a very substantial, up to date, evidence base. The Lords' would appear to be taking a narrow view of the Town Centre's prospects and the means of securing them, including for inward investment, based on the interests</p>

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		<p>3. The plans for traffic management in the town centre will reduce the attractiveness of the Lords commercial and residential properties to tenants.</p> <p>4. Policies are too specific and are likely to act as a barrier to incoming investment to the cost of the town.</p> <p>1.8 This Report is divided into the following:- Section 2 Context to the Representations Section 3 Conclusions</p> <p>2.0 CONTEXT TO THE REPRESENTATIONS</p> <p>2.1 As set out in Section 1, the Lords do not object to regeneration of the town centre and, like the Council, wish to encourage inward investment. The Lords themselves have invested considerably in the town centre through, in particular, the maintenance of their properties and bringing back into use residential units over ground floor commercial premises. In order to achieve the latter, the Lords have had to provide car parking in close proximity to the properties to make them attractive to tenants.</p> <p>2.2 In order to promote inward investment and to improve car parking provision in the town, the Lords are progressing proposals for a multi-storey car park at their Beck Hill car park. In 2008, the Lords instructed Structural Engineers, Alan Wood and Partners, to investigate the feasibility of a new multi-storey car park. They concluded that a multi-storey car park over three floors with a capacity of between 200-250 cars was deemed feasible and produced plans for a preliminary scheme providing 213 car parking spaces.</p> <p>2.3 Although the AAP and SPD propose a two deck car park at Beck Hill providing 80 spaces, the Lords proposals for a multi-storey car park is seen as being incompatible with the policies of the plan. The Lords scheme was discussed with the East Riding of Yorkshire Council in January 2009 at which the Council concluded that whilst a private car park owned and operated by the Lord Feoffees could be acceptable, the proposed multi-storey car park would not be supported. The multi-storey car park is seen as being contrary to the emerging AAP as it is too large and could prejudice the realignment of Beck Hill and the provision of frontage development to the re-aligned Gypsy Race. The AAP proposes the re-alignment of Beck Hill to facilitate a revised traffic management scheme for the town and the provision of frontage development as part of the proposed Gypsy Race pedestrian link. The development proposals set out in the AAP will require the acquisition of part of the Beck Hill car park to the extent that the planned multi-storey car park could not be provided on the site. As well as affecting the Beck Hill car park itself, the proposals would also adversely affect the Saw Mill Yard area.</p>	<p>alone of their own tenants. All of the evidence shows that the Lords' tenants will benefit from the delivery of the regeneration plans – far more than they would by the gains in parking alone as the Lords propose.</p> <p>The Council, of course, is concerned to ensure that development proposals do not produce adverse consequences that prevent the wider interests of the town centre from being served; the Council at the same time is committed to working with prospective developers to ensure that all beneficial proposals can proceed. This offer is, and long has been, extended to the Lords.</p> <p>The Council is fully cognisant of the effects of the high standards of design and sustainability sought by the AAP on developer costs. The AAP explains that the Council will take a flexible approach, including in respect of the effects of the requirements on the viability of proposals. The plan's stance is in line with the guidance set out in national planning policy. The Council does not accept the views on the extension of the Primary Shopping Area; the view expressed is inconsistent with the evidence on the capacity and needs of the town centre for additional retail floorspace and with the guidance in PPS4 on how best to locate this. The Council also cannot accept the view in respect of parking and traffic management as this view too is in contrast to the evidence.</p> <p>3. The Council regrets that despite all of their consultation with the Lords, offers of joint</p>

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		<p>2.4 The Lords are concerned that the two deck car park proposed by the AAP will not be of an adequate size to maintain this car parking provision. The two deck car park merely replaces the existing spaces, with the addition providing for the operational needs of the new development. The proposals contained in the AAP do nothing to increase the car parking and, therefore, the income for the Lords. Indeed, the costs associated with the management and maintenance of the two deck car park is likely to leave the Lords with a reduction in their income.</p> <p>2.5 The Lords are, therefore, concerned that the proposals set out in the AAP are acting as a constraint to inward investment. At Beck Hill, both the Council and the Lords wish to see additional car parking provision but the Lords proposals are not acceptable to the Council – the Lords investment decisions are thwarted by the AAP. The Lords are keen to assist the Council in the regeneration of the town centre through the provision of a multi-storey car park at Beck Hill and the Lords are disappointed that the draft Plan would seem not to allow this to happen. As such, the Lords consider that the AAP and SPD should be amended to allow for the provision of a multi-storey car park at Beck Hill.</p> <p>2.6 The Lords are also concerned that the traffic management measures proposed in the AAP, which seek to impose traffic restrictions for on street parking, access and deliveries, will affect the viability of businesses in the town centre. In particular, the AAP seeks to make the area of Bridge Street, Manor Street and Queen Street pedestrianised, with no rear access to the properties on Manor Street. The Council are also proposing to require all short stay car parks, such as Beck Hill, to be priced and managed within Council policy.</p> <p>2.7 It is, and always has been, the Lords Feoffees aim to provide both their commercial and residential tenants (along with their visitors and customers) with low-priced town centre parking facilities which, the Lords feel is a necessity for local businesses and the key to the prosperity of the town. Again, the Lords are concerned that the proposals within the AAP to manage pricing in the car parks will undermine their ability to attract tenants to their properties. In this regard, the Plan would seem to discourage, rather than promote, investment in the town centre.</p> <p>2.8 The Lords are also concerned that the AAP seeks to restrict any development proposal that is not totally in line with the objectives and the policies of the Plan. As such, the AAP is too inflexible which is likely to dissuade, rather than encourage, inward investment. The proposals for the</p>	<p>working and sharing of the evidence for the proposals, that the Lords still object. The Council is nonetheless committed to continuing to work with the Lords in an effort to reach jointly satisfactory solutions. The Council's obligations, however, rest with serving the wider interests of the prosperity and wellbeing of the town as a whole.</p> <p>The Council proposes no changes to the AAP in response to the Lords' comments.</p>

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		<p>Beck Hill car park are a prime example of this lack of flexibility.</p> <p>2.9 The Lords are also concerned about the principle of proposals for commercial development on parts of it s Beck Hill site adjacent to the two deck car park as envisaged by the Council. Not only does commercial development reduce the amount of land available for car parking (and the potential construction of a multi-storey car park) but it creates development adjacent to car parking with all the resultant amenity issues of noise, dust, vibration and smell.</p> <p>2.10 Notwithstanding the above, the proposals for the town centre contained within the AAP are extremely ambitious and will rely significantly on public funding for their implementation. The Lords note that the AAP and the SPD are being progressed in advance of the Core Strategy DPD for the East Riding. For this reason, the plans rely on the saved policies of the Joint Structure Plan for Hull and the East Riding (2005) and the Regional Spatial Strategy for Yorkshire and the Humber (2008) for its strategic policy context. Both the saved policies of the Joint Structure Plan and the RSS designate Bridlington as a 'Principal Town' where economic and housing development should be focussed. The Regional Spatial Strategy (RSS), however, states that the coastal towns in the Eastern Sub Area, including Bridlington, 'should be the focus for smaller scale economic and housing developments' (para 4.72). The Burlington Parade proposals, particularly when considered with the other proposals for the town centre included within the AAP, do not represent small scale economic and housing development. Conversely the town centre proposals are large scale as they include most notably:-</p> <ul style="list-style-type: none"> • the Burlington Parade Comprehensive Redevelopment Area including the realignment of the Gypsy Race, the delivery of new access routes, the delivery of the new car parking, the delivery of strategic areas of public recreation (Station Plaza, Gypsy Race Park, Burlington Pavement, Gypsy Courts, Town Square, Harbour Entrance and Harbour Plaza); • the development of the new Marina including new harbour buildings, operational land associated infrastructure with an extension to the listed North Pier, a new South Pier, a new non tidal locked basin, a new tidal basin and new half tidal basin and new areas of land reclaimed from the sea; and • the relocation of the Primary Retail Area away from the Town Centre Seafront to a new shopping area. <p>2.11 The AAP acknowledges that it is difficult to overstate the scale of the work entailed to create the Marina and the Burlington Parade schemes. The proposals set out in the AAP are ambitious, comprehensive and represent a significant financial cost in their implementation. The AAP acknowledges that</p>	

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		<p>the costs of implementing the AAP will be substantial but no business plan has been prepared which sets out how this will be achieved. In current economic circumstances there must be some doubt that the plan can be implemented and the Lords are concerned that a commencement on parts of the Burlington Parade scheme may be made but with no guarantee that it would ever be completed. This would be to the detriment of the town and, therefore, some commitment needs to be made such that once commenced, the Burlington Regeneration scheme would be completed. In this regard, the Lords consider that a full Business Plan and funding for the completion of development should be in place prior to the commencement of any construction.</p> <p>2.12 The relocation of the Primary Retail Area away from the existing town centre would also have an adverse impact on the desirability of the Lords existing premises and their rental income. The Lords have invested heavily to improve their properties within the existing town centre and are concerned that this investment could be in vain if the commercial heart of the town is re-located. In the same vein, the Council has invested millions on the refurbishment of the Kings Street library (leased from the Lords) but the re-location of the town centre will inevitably affect footfall and, therefore, the attractiveness of this area. Moreover, the relocation of the town centre will do little to enhance the Promenade shopping centre which already has a number of vacant shop units.</p> <p>2.13 In respect of investment, the Lords are also concerned that the financial viability of the Town Centre proposals is undermined by the need to provide:-</p> <ul style="list-style-type: none"> • 40% affordable housing as part of any major housing development; • the 10% requirement for energy supply from on-site low carbon renewable technology for housing schemes of 5 dwellings or more and for other developments with a floorspace in excess of 250 sq metres; • achieve 'silver' on the Building for Life standard for any housing development in excess of 14 units; • a minimum of BREEAM 'very good' and/or Code for Sustainable Homes 'Level 4' for all major developments; • financial contribution to the provision of public realm; • contributions towards sustainability in respect of design, layout, building form, use of sustainable building materials, water capture and recycling, recovering and recycling waste, and contributions towards biodiversity and geological conservation; and • preparation of Development Statements for all major development within the designated Town Centre. <p>2.14 Whilst the Lords support the Council to encourage inward investment, the</p>	

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		<p>above requirements increase the costs of development and, therefore, its provision. These requirements could undermine the financial viability of investment by the Lords to improve the town centre in the short term, as these provisions would need to be met as part of any development proposal. In order to encourage investment, the Lords consider that, particularly in the Regeneration Areas, the above requirements should be relaxed so as to maximise the attractiveness for private sector investment in the town.</p> <p>2.15 Finally, the Lords are concerned that their ability to promote development in the town is adversely affected by the Council's policy not to allow any development in the Burlington Parade area unless it conforms to the provisions of the AAP. Again, the development of short term improvements to the Lords landholdings may be constrained by the implementation of this policy. The Lords need to be able to implement improvements to their land and properties irrespective of whether or not the Burlington Parade scheme is coming forward.</p> <p>3.0 CONCLUSIONS</p> <p>3.1 Having regard to the above, the Lord Feoffees and Assistants OBJECT, in principle, to the Second Preferred Draft Bridlington Town Centre Area Action Plan and Bridlington Supplementary Planning Document on the basis that the Burlington Parade Regeneration scheme will have an adverse impact on the Beck Hill Car park and the Lords ability to bring forward its multi-storey car park. In addition, the traffic management measures proposed for the town will reduce the attractiveness of the Lords town centre properties to commercial and residential tenants. Finally, there is no certainty that the proposals set out in the AAP will be funded. A Business plan setting out the costs and funding has not been provided for this ambitious and costly plan. The attractiveness of the town to inward investment is also exacerbated by the 'planning gain' policies and the objection to any development which does not conform to the objectives of the AAP.</p> <p>3.2 In summary, for the reasons set out in Section 2 of this Report, the Lords object to the following policies and their supporting text:-</p> <ul style="list-style-type: none"> • BridTC1 and BridTC2 in that it places a moratorium on any development proposal that does not meet the objectives of the Town Centre AAP and the SPD; • BridTC2, BridTC3, BridTC16 and BridTC19 in that it requires the implementation of the Burlington Parade scheme as set out on the Proposals Map, a contribution to public realm and requires the delivery of the traffic management proposals for the town centre; • BridTC3 in that it requires high levels of sustainability for all major developments to the potential detriment of encouraging inward investment; 	

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		<ul style="list-style-type: none"> • BridTC5 requiring Development Statements in that the requirements are duplicated in Design and Access Statements; • BridTC8, BridTC10, BridTC11, BridTC12 and BridTC13 concerning the extent/uses of the Burlington Parade and the effect that the proposals have on the Beck Hill car park; • BridTC14 concerning access and movement and the impact of the proposals on existing town centre uses along with the impact of the proposals on the Beck Hill car park through the re-alignment of Beck Hill and Gypsy Race. • BridTC15 and the requirement to provide only 80 spaces at Beck Hill rather than the 200 – 250 spaces proposed by the Lords and the reference to public control of all short-stay parking; • BridTC17 for the reasons set out above and in Section 2 of this Report. <p>3.3 The Lords also wish to see a monitoring and delivery programme to ensure that, prior to development commencing, the funding is available for the completion of the Burlington Parade development. The Lords are concerned that the development proposals are ambitious and may not be achievable. Indeed, development of Parts of the Burlington Parade may commence and not be completed to the detriment of the town centre as a whole.</p>	
M Coltman	AAP + SPD	<p>I have read both the supplementary Planning Document and the Second Preferred Options Area Action Plan form cover to cover. I totally support the SPD in full and its aspirations to reach the very highest quality of redevelopment design, in particular with reference to architecture which recognises the town's Georgian and Victorian heritage but where contemporary architecture of the correct massing, scale and design can also complement this architecture but leave behind a set of new buildings which represent the age in which we live and that hopefully will also have reason for people to preserve them in the future. with regard to the Area Action Plan document second preferred options i too wholeheartedly support the entire document and its aims and aspirations for Bridlington. I have been involved in the process of the preparation of the work undertaken in preparation for the Regeneration Strategy of 2004 and would like to show my appreciation for the very accurate interpretation of this strategy within the AAP and the consequential preparation of this document to embed the proposals into this new Local Plan. The second preferred options document satisfies my very few concerns which arose from the first preferred options document and I am happy that other people's concerns have also been listened to and responded to. I recommend the document be taken forward to the enquiry stage with my full support as a resident of Bridlington. I only have a small number of following comments and exceptions to make with specific reference to the appropriate</p>	<p>The Council welcomes the support for the AAP, and thanks M Coltman for the work to help shape it.</p> <p>The Council acknowledges that the Old Town also needs investment, but stresses that the priority, in a limited market, needs to be Burlington Parade.</p> <p>The Council will fully consider the potential for processing operations as part of the fishing quay should this prove feasible and appropriate. The Council fully supports the principle of value-adding activity within Bridlington itself, and notes that if the fishing quay itself is not appropriate, that there will be opportunities at Bessingby and Carnaby to accommodate this activity.</p>

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		<p>paragraph and sub-section numbers:</p> <p>4.47 Reference to Old Town's office stock as being 'not appropriate' - I fully support the concept of new town centre offices as part of the redevelopment of Bridlington but I disagree that Old Town's offices are not appropriate - Old Town needs a mix of shop, residential and office accommodation for the same reasons the town centre redevelopment plans need office space included and in my opinion Old Town provides an excellent base for small offices as part of that necessary mix. We must not jeopardise Old Town's regeneration - it must be complementary to that of the town centre.</p> <p>5.46 I particularly wish to support this proposed policy that local businesses and the local labour market are able to benefit most from the opportunities that the redevelopment of Bridlington provides</p> <p>5.58 (v) The Marina I would like to see reference made to the possibility of providing processing jobs at the new south key fishing facility, as well as warehousing, repair and associated facilities. I have always believed that it is essential that processing jobs, where possible, are also created within these new facilities.</p> <p>6.63 I am delighted at the projected timescales and would like to encourage the Council, as lead partner to, as suggested, expedite any or all of these target dates if at all possible.</p>	
M Eckles	AAP	<p>Plan indicates Tesco to have 700 parking places whilst the rest of the town retail area has a total of 850, 360 of which are adjacent to Tesco in the new retail area, this will divert the public away from using existing facilities nearer the existing town centre thus these retail outlets which will become even more run down than they are at present. There is insufficient parking in the Beck Hill, Harbour area - The main problem with the town at present is that there is nowhere to park near the shops except on the harbour top and Beck Hill. In Beverley and Whitby, both of which are thriving towns, parking is readily available adjacent to the town centre shops - this is what the majority of the population of Bridlington wants if the ERYC ever bothered to ask. It would appear that grandiose schemes are being thrust on the town by ERYC staff who don't live here but in the Beverley area where they do have parking adjacent to the town centre.</p>	<p>The AAP proposes a substantial increase of parking through the remodelling and decking of the Palace Car Park and the increase in parking and the decking of the provision in Beck Hill. The Council accepts that current provision is inadequate, but points out that the proposals for parking promoted by the AAP are part of a wider, evidence-driven, strategy for the regeneration of the town centre. The evidence shows that shortcomings in parking are just one of the town centre's problems; and that solving this will not resolve the others, nor will it enable the town centre to realise its other substantial opportunities.</p>
Ministry Of Defence	AAP	<p>Bridlington falls outside of the Ministry of Defence statutory safeguarding area; therefore the MOD has no safeguarding concerns to this proposed document.</p>	<p>The Council notes the comment.</p>

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<p>Natural England</p>	<p>AAP + SA</p>	<p>Open space and Green infrastructure is important to create a better quality of life for residents and visitors to Bridlington and for the health and well being of residents to provide alternative areas to the busy streets and traffic of town centres. Green Infrastructure comprises the provision of planned networks of linked multi-functional green spaces that contribute to protecting natural habitats and biodiversity, enable response to climate change and other biosphere changes, enable more sustainable and healthy lifestyles, enhance urban liveability and wellbeing, improve the accessibility of key recreational and green assets, support the urban and rural economy and assist in the better long term planning and management of green spaces and corridors.” (The Countryside In and Around Towns: The Green Infrastructure of Yorkshire and the Humber, July 2006). Further information can be found on our website: http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx</p> <p>Appropriate Assessment Screening This is in fact screening under the Habitats Regulation Assessment process, Appropriate Assessment is another stage in the process. We agree that there are likely to be significant effects on the Flamborough Head SAC and Flamborough Head and Bempton Cliffs SPA in relation to 3 of the AAP policies, 1, 2 and 18 which all relate to the development of the marina. An appropriate assessment of these effects will be carried out. (Ask Leanne to check the potential effects on the European features, I think they have maybe taken an overly precautionary approach ie screened in more effects than necessary). Page 2 Humber Estuary SAC and SPA, this assessment should consider effects on sediment supply and transport to downdrift European sites, especially the Humber Estuary (which includes Spurn). Page 10 Habitat Regulations Assessment for HECAG SMP2 is at draft stage. The Appropriate Assessment must be carried out before final design/ planning is finalised. It may be necessary to change the design or operation of the marina (through planning conditions) to reduce any adverse effects on European sites. They need to use the most recent conservation objective information (Leanne has sent this to the consultants already).</p> <p>Sustainability Appraisal Page 8. Screening for likely significant effect is not Appropriate Assessment, it is an earlier stage in the Habitat Regulations Assessment. Appropriate Assessment is the next stage, if significant effects on the features of the European sites are deemed to be likely. Page 63 Check the status of the East</p>	<p>The Council notes the comments, and drawing additionally on the SA of the Second Preferred Options draft of the AAP, proposes the following changes to the AAP in response:</p> <ul style="list-style-type: none"> ▪ additional references, in respect of the proposals for Burlington Parade, Marina and the Strategic Public Realm, to their role in providing the town centre with ‘green infrastructure’. These schemes already do this (including the new Gypsy Race Park and the role given each element of the Strategic Public Realm), but the Council accept that more needs to be made of them in promoting their environmental benefits, biodiversity and management of surface water / increasing flood capacity; ▪ additional references to the completed ‘Habitats Regulations Assessment (HRA) Stage 1 Screening’ and updating of the text to ensure developments avoid risks, where these exist (the construction and operation of the Marina), to the Flamborough Head and Bempton Cliffs SPA and the Flamborough Head SAC.. <p>Amendments to the final Sustainability Appraisal will take into account the following:</p> <ul style="list-style-type: none"> ▪ The Council commissioned detailed sediment transport modelling of the effects of the Marina development (carried out by HR Wallingford in 2006). This study demonstrated that the impacts on sediment movement and associated water quality issues would be limited to within the Harbour and shoreline coastal waters immediately adjacent to the proposed harbour extension

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		<p>Riding LBAP. In our letter of 10 October 2007, we advised that a number of issues with relation to the marine environment should be taken into consideration. We are disappointed that this advice has not be taken and we advise that the SA is amended to address these issues.</p> <p>1) The extension of the area of the existing harbour for the marina development should not have an adverse effect on sediment transport along the Holderness coast and into the Humber Estuary which is a European Marine Site (should be covered in the Habitat Regulations Assessment).</p> <p>2) The impacts of any capital dredge works that would be necessary within the harbour, specifically the effects of increased levels of TBT in the marine environment both during the dredging and at the disposal site.</p> <p>3) Increased levels of disturbance on the Flamborough Head SAC and SPA, both from leisure and commercial (sea angling, potting and trawling) boat traffic (this will be covered in the Appropriate Assessment).</p> <p>4) There will be no significant loss of habitat for birds/ invertebrates on the sandflats which would be impounded by the marina development.</p> <p>Issues 2 and 4 should be covered separately, as monitoring of effects will not be covered in the relevant LBAPs or monitoring of designated sites.</p>	<p>works. Although there will be further studies on sediment transport in relation to the Marina development during the design stage, and potential effects upon the marine habitats which are qualifying features of Flamborough Head SAC, it is considered extremely unlikely that any marine development would affect sediment supply and down drift transport to the Humber Estuary European Marine Site due to the distances involved. Therefore, the Humber Estuary European Marine Site is not considered further in the HRA Stage 1 Screening.</p> <ul style="list-style-type: none"> ▪ Assessments of the components 2 - Siting (BridTC2: The Town Centre Regeneration Priorities) and 12 - Marina (BridTC18: Bridlington Marina) have been amended to reflect this comment, in particular with regards to SA objective 10 (water quality). It has been recommended that TBT-based paints be avoided where practicable and that TBT compounds in the marine environment be monitored. The HRA Stage 2 Appropriate Assessment will look further into potential pollution impacts, as there will be further studies required at the Feasibility and Environmental Impact Assessment stage (see the scope of the full AA in the HRA Screening Report, Appendix 3. ▪ The assessment of component 12 (Marina, BridTC18) against SA objective 14 (biodiversity) have been more closely aligned with the comment. The HRA Stage 1 Screening wording has now been amended to reflect these activities. The comment is now reflected in the assessment of the component 12 (Marina, BridTC18) against the SA objective 14 (biodiversity). This was not

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			deemed to be an issue for the HRA Stage 1 Screening either, as this habitat loss is outside of the SPA/SAC and is not considered an area of importance for birds or habitats outside of this site.
P & M Masters	AAP	<p>Gypsy Race In the free Press there was an article about the state of the Gypsy Race between Midway Avenue and St John's Avenue along Gypsy Bank. This bit of the Race feeds the Race that is going to be regenerated. At present it is overgrown, filthy, stagnant, smelly and full of rubbish. There is also only a trickle of water running along it. This will affect your nice clean regenerated beck. In the winter the rubbish etc. will be pushed along our part when the rains and snow comes and be washed into the clean part. Who will take responsibility to clean and maintain our part to keep your part free-flowing? Council and Environment Agency have been contacted and neither will take responsibility.</p>	<p>The Council agrees that the Gypsy Race is an asset that needs improving, and the AAP provides for this.</p> <p>The Council proposes no change to the AAP in response to the comments.</p>
P Austin	AAP + SPD	<p>Transport</p> <p>Removing on street parking? – ref 4.111 AAP There are a large number of residents in the town centre and commuting workers plus visitors staying at B&Bs. How do they have access to their dwellings/offices. The car park charges are too much for the low paid and staying visitors. Will there be a residents parking permit at a reasonable cost for these people.</p> <p>Introduction – traffic levels declined 2004 to 2007 There is no data given – When was it taken? The population has increased by at least 5,000 people in that period – no way would traffic levels go down!</p> <p>Trinity Road to take diverted Traffic This road is far too narrow for a major diversion</p> <p>Station Rd & B&Q Junctions Phased lights would impede flow, laned roundabouts with a larger road area diameter would be more efficient. Also when traffic is at its peak in summer when the schools are closed why cannot Bessingby Way not be returned to a dual carriageway to bleed off flows more quickly to the small retail park (only signing and a small area of brick paving needs to be removed.</p> <p>Cycle & Motor cycle SPD 3.20 and AAP 3.27 To encourage two wheel traffic it is necessary to provide secure parking stands</p>	<p>The Council welcomes the comments and will take them into account. The proposed changes to the traffic routing and parking will require Traffic Regulation Orders, and the Council will consult fully on the details of proposals when they are made.</p> <p>The Council meanwhile has carried out extensive modelling of the traffic effects of the proposals and the measures proposed for managing them. The modelling shows that the measures promoted by the AAP will be the most effective in reducing congestion and improving access to and efficient movement within the town centre. The Transport Assessment forms part of the evidence base for the AAP.</p> <p>The Council proposes changes to the AAP to take into account comments in respect of parking for the Marina, emphasising the cycle proposals (including cycle parking facilities), the importance of IT connections in the town centre, the</p>

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		<p>This is not mentioned in the plan and is very necessary for visitors and residents. Ones are needed along the Gypsy Race walkway and along the sea front – Sustrans route? For cycles and more in car parks for motorcycles.</p> <p>Parking for Marina berths SPD 4.99 AAP4.107 Yachts –require sailing gear,water canisters, electrics to charge equipment ,food canisters, pumping out facilities e.t.c This requires not only berth facilities but parking to load gear e.t.c. This is not mentioned as a designated area in the plan?</p> <p>Supplementary Planning Document</p> <p>2.6 – Only area of Civic function (Town Hall Gardens. Ignores 62 Quay road opposite – Town Council Offices</p> <p>2.64 – Adjoining Town Centre No real mention of the local leisure facilities eg. 2 professional football clubs. RUFC club, Community Sports Club (Tennis, Bowls, Hockey, Cricket Brid CC, Petanque e.tc.), BMX & Skatepark and Astroturf football,basketball etc MUGA. These facilities welcome visitors and residents alike and add to the activity mix for the Town including health and Youth promotion facilities These require a car park as the gear needed and Team transport/ Officials parking cannot be effected from the park and ride. Thus Moorfields car park should be free to encourage use but also to pull congestion off areas south of Queensgate. A green fun area in Town!!</p> <p>2.67 – Listed Buildings The Promenade up to Bellevue (Tennyson Ave) and those in Queen St/&Square need to be looked at for conforming signage – AAP 2.27 Also the only night toilet in Town is at the Queen’s Street facility if this is closed where will the other one be? After 6pm we do want to encourage people to use the Town Centre. This is not mentioned in the plan – also a public toilet is necessary in the shopping area – Tesco will get rather upset if everyone uses theirs.</p> <p>Area Action Plan</p> <p>2.30 v) – Need to ensure when promoting business support and workspace schemes that WIFI/Internet facilities work in the Town. At present they are woefully inadequate and even worse ,variable. Firms will not locate until there is sufficient internet speed for example.</p> <p>2.30 x) –Improving signage</p>	<p>importance of public lavatory provision and the recognition of the newly designated conservation area.</p> <p>The AAP promotes a bus interchange as part of the proposals for Burlington Parade.</p> <p>While the AAP promotes sports, the provision within the AAP area are limited (i.e., apart from the beach, the cycle routes, the Marina and leisure world). The Council, as part of the detailed work on the Marina plans, is considering the scope for promoting other water sports in addition to sailing.</p> <p>Once the new town square is built, there will also be opportunities to promote its use for use activities, including sports.</p> <p>The Council proposes no changes to the AAP in response.</p>

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		<p>Unless you are in the “know” Sports facilities at Moorfield, Flamborough Rd and North St. Car Parks are unknown.</p> <p>This overloads Palace and Beck Hill Car Parks, also where are the Car Parks on the South Marine Drive side of Town if Parking is removed from the streets. Thinking of residents in the area (again residents parking permits are required)</p> <p>2.30 xii) – Additional Sports The Town Council survey has proved that many people want paragliding, para-boarding, sand yachting, sail-boarding and kiting festivals and facilities.</p> <p>4.45 – Offices in the centre of Town will require commuting staff. But where are the commuter bus services required. Not present at the moment.</p> <p>4.119 – Parking for workers in Central offices need to be for more than 4hrs</p> <p>Overall my personal view is that the plans are good for the Town and the faster we can do this the better. However if you attract people to live in Town not all will work in the Town or stay in Town all the time. So vehicle parking with developments is absolutely essential or they will not buy the apartments.</p>	
P Dearing	AAP	I work for the Halifax on Manor Street. I am concerned around the access to the back of the building via Beck Hill. This is used to access the rear of our properties and has parking spaces for employees and is also used for deliveries as well as our fire exit.	The AAP will not remove the parking to the rear of Beck Hill without replacement facilities (the AAP proposes a decked car park that will increase parking in this area), and all proposals will take into account safety requirements like means of escape and access for emergency vehicles.
P Foster	AAP	I think that Bridge Street and Queen Street should be pedestrianised only if you allow two-way vehicles and parking on King Street. As a pedestrianised King Street serves no purpose, other than the market which should be re-located to Queen Street / Bridge Street.	The Council notes the comments and will take them into account when detailed Traffic Regulation Orders are prepared and consulted upon.
P Marshall	AAP	We were impressed with the plan and look forward to some traffic relief and more pedestrianisation.	The Council notes and welcomes the support for the AAP.
R & S Curtis	AAP	We are pleased that the uncertainty created by Regeneration has come to an end and firm plans are in place, which will help local businesses to decide whether or not to invest in areas of the town. Bridlington is unusual in that the shopping and holiday/seaside areas are together – so has not suffered from the ‘two centres’ problems that other towns	The Council welcomes the support for the AAP, and can reassure that the entire aim of the proposals is to promote the competitiveness of the whole of the town centre, all year round. The evidence for the AAP shows that in fact that the

Respondent	Type	Full Representation	Response & Recommendation
		<p>have. This is a feature that should be built on.</p> <p>A major concern is a proposed Hilderthorpe Road retail development will harm the local economy, many local traders (always the heart of the Bridlington economy), will find it hard to cope with the relocation on the shopping area, possibly leaving the town centre a wasteland in years to come.</p> <p>Top objective should be to reassure, retain and help existing businesses.</p> <p>We would be interested to see what plans are for the period of change, i.e. while the 'grand plan' takes place (in twelve years) so the town remains appealing to visitors and investors and a fallback situation should finance of the 'grand plan' become impossible to find.</p> <p>We were concerned that the consultation for such an important scheme has been inadequate – two half days, only one of which was held in the affected area.</p>	<p>physical conjunction of the shopping function of the town centre and the seasonal seafront activities have been unhelpful. The extension to the Primary Shopping Area is in a location which allows the new and old to function as a single entity, and for the Seafront to regenerate for a mix of year round activities, including gift shops, food and drink, hotel and leisure.</p> <p>The AAP consultation period is six weeks at each stage (three so far); and the Council is pleased to welcome visitors at any time to discuss the proposals. The Town Team is also open to all, and details are set out in the Bridlington Regeneration newsletter which is widely circulated.</p> <p>The Council proposes no changes to the AAP in response.</p>
R Atkinson	AAP	<p>Page 59 – 3.33 Traffic Congestion (seasonal) This is mainly caused by the re-design of the Chapel Street junction, i.e. reduction down to one lane. A reinstatement of the left-turn lane would help in taking traffic out of the town centre. To improve the pedestrian environment closing Cross Street (5.75 connect existing spaces) with access only to service busses. This would link the two main islands of shopping, also making traffic go round by Cliff Street, Prince Street, would discourage through-traffic (4.99) Doing this would simplify junctions. A must which is contrary to your thoughts is the opening of King Street to through-traffic and parking.</p> <p>Page 93 – 4.25 Loading Set loading times prior to business etc. is good sense however when good vehicles try to use them they are taken by disabled drivers cars.</p> <p>Page 95 – 4.30 Removal of Traffic from Bridge Street This would make an ideal Park and Ride drop-off, pick-up point, delivering punters straight into the town centre complex.</p> <p>Page 111 – 4.90 Permitting parking on streets Where it is banned during the shopping day this should definitely be encouraged before 10:00am and after 16:00. As this is when the holiday makers are going home and would boost the shopping trade from locals who</p>	<p>The Council welcomes the support for the AAP's proposals for restricting loading hours, reducing traffic on Bridge Street and reducing on street parking during shopping and office hours. The Council responds to the specific points as follows:</p> <ul style="list-style-type: none"> ▪ The Council, when it prepares the Traffic Regulation Orders, will take into account the comments in respect of the circulation around King Street, Cliff Street and Prince Street. ▪ The Council agrees that it can be helpful to permit on-street parking outside shopping hours and will take this into account in preparing the detailed proposals. ▪ The Council is working with Network Rail and the train operating companies on the proposals, and can reassure that there would be appear to be no loss of capacity for

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		<p>have finished work and have cash to spend.</p> <p>Page 121 – Plan 4.4 A cycleway would be a good idea, however Bridlington has an aging population and not many holidaymakers can fit a cycle in their car.</p> <p>Page 125 – 4.10S The loss of 50 – 75 non-disabled parking spaces presently provided on-street in the shopping core. Is the shopping core the same as the Primary Shopping Area, if it is then (3.19) states that Cliff Street and Prince Street will retain on-street parking.</p> <p>Page 152 – 5.37 iv Rail / Bus interchange Many years ago EYMS / British Rail did just that. It also had a through road (until Tesco was built). It crossed a road bridge which is still there and could be re-used. The purchase and demolition of one house on Station Ave would allow better disabled access to Platform 4. Also parking/pickup from outside the health centre via bus stops (this was on the plans before they were built, it was to be between plots 16 &17). The loss of the rail excursion platforms to redevelopment would prevent future rail use if excursion trains similar to the one last month which brought in 500+ punters with money.</p> <p>Page 167 – 5.75 Define the Hierarchy (highway routes into and through the core) If Queen Street is shut and King Street not re-opened then there will be no route through the core from North to South. Thus this objective is not met.</p> <p>Page 170 – 5.80 ‘Closed’ out of season Many days out of season Bridlington is dead and would benefit from some trade. So on-street parking would be good, even if it’s only for residents, say using a ‘residents’ pass.</p> <p>Solutions</p> <ul style="list-style-type: none"> • Improve access to Moorfield Road car park. This would allow it to be used for coaches as well. Improve transport infrastructure. The seaside resorts mentioned in the text all have dual-carriageways or better leading them to by-pass small villages on the A614. • Clean footpaths and well maintained roads help. • What about a large screen TV in Queen Street. It would fit up against the back of the library with new toilets as its base. • Open King Street to traffic and parking. Extra left-turn lane in Chapel Street. Residents on-street parking pass. 	<p>excursion trains by incorporating the disused track and platform into the Burlington Parade scheme.</p> <ul style="list-style-type: none"> ▪ The Council welcomes the suggested ‘solutions’ and will take these into account as the proposals are developed further for implementation. <p>The Council proposes changes to the AAP to clarify that the Primary Shopping Area and the shopping core are the same thing.</p>

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R Gould	AAP	I agree in principle with the site for the marina development. I do not agree with the planting of trees in the Pembroke Gardens area. The gardens are a credit to Bridlington as they are and trees would spoil the view to the sea from this area. If it rains most people go to the nearest café, not shelter under a tree.	The Council notes the comments, and hopes that the completed scheme for the Gardens will satisfy expectations.
R Hilton	AAP	Great plans, will radically transform Bridlington, and just what this town wants. Hopefully will be delivered soon. Fully support what Council are trying to do here.	The Council welcomes the support for the proposals.
R West	AAP	<p>Primary Shopping Area - I note the area does not include Prince Street which includes Marks & Spencers, an important shop for Bridlington. In the plan Tesco's seems to be the only store mentioned. I suggest M&S should be given the opportunity to move to another prime area in the plan.</p> <p>2.54 -- Landmarks. Rags is stated as a landmark site, I cannot agree with this. The building is a dressed up old RAF shed and needs replacing in the new Marina Plans.</p> <p>2.66 -- Weak or missing frontages. I would suggest that the South side of Hilderthorpe Road from the entrance to Nelson Street to the exit at Bridge Street requires some treatment or replacement. As existing it will be in great contrast to the renewed North side and would allow for widened and improved road works.</p> <p>2.67 -- Buildings and Structures of Historic Interest. I suggest 8 to 12 or 14 Queen Street are historical frontages or perhaps all Queen Street. Superdrug is the weak point. On the South side the Yorkshire Bank is of interest. On King Street South side from the old TST Bank to and including the Nat West Bank is a frontage of character that wants to be preserved.</p> <p>5.18 -- Future design features. I consider that all new buildings should have pitched roofs of tile or slate, or if flat, dressed around the eaves to appear pitched from ground level. The facades or outer skins should be all of brickwork to maintain the towns character unless another material is architecturally compatible.</p>	<p>The Council notes the comments and responds as follows:</p> <ul style="list-style-type: none"> ▪ The Council is, of course, keen to retain M&S in the town centre and agrees that it is an important store. The deterioration of the street, however, is problematic and is partly the consequence of its location vis the Seafront. ▪ The AAP promotes the improvements you suggested for the southern part of Hilderthorpe Road. ▪ The designation of the Conservation Area provides the town with a valuable tool for promoting the protection and enhancement of its heritage assets, including those mentioned. ▪ The Council is promoting the design guidance in the SPD. <p>The Council proposes no changes to the AAP in response.</p>
Royal British Legion	AAP	Having perused the Bridlington Regeneration Plan it says a great deal about buildings but very little regarding the cost and the loss about peoples Organisations or Associations similar to the Royal British Legion Club (Bridlington) Ltd. It is not widely known that the Royal British Legion Branch and the Royal British Legion Club Bridlington are separate entities and	The Council is fully aware of the disruption to existing organisations and clubs, and is dealing directly with the Royal British Legion and the local tenant of their property. The Council is concerned to ensure that every club and association affected

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		<p>organisations in their own right. The Branch is the Charity and Landlord of the building the Royal British Legion Club rents the premise's from the Branch. Whilst we the members of the Club would like to see the Willows retained as the club premises, unfortunately that decision does not rest with the Club members that is a matter for the Royal British Legion Trustee's, who are not informing the club regarding the Bridlington Regeneration Plan. You will appreciate that the loss of the Royal British Legion Club will rip the heart out of the ex-service community in Bridlington. The problems facing the Royal British Legion Club at the present time is the fact there is no date fixed as to when the building will be sold to E.R.Y.C, and obviously Club closure. The question arises will compensation be payable to the Club through lack of membership and business due to the fact there is no closure date or information being passed to the Club from the Bridlington Regeneration Plan or the British Legion Trustee's? If the lack of relevant information persists it could mean that the Club could be incurring debt through no fault of the Club Committee due to the lack of information.</p> <p>The four main questions obviously arise:</p> <ol style="list-style-type: none"> 1 When will notice be given to the Royal British Legion and could the Royal British Club be kept informed? 2 How much notice will be given to the Landlord to vacate the premises? 3 Will compensation be paid by the Regeneration Scheme to The Royal British Legion Club (Bridlington) Ltd? 4 The Bar Manager lives in a flat on the premises, will she be re-housed by ERYC? <p>You will appreciate these are worry times for the Club Committee and Club members, any help, answers, or advice you could give to the Club Committee in these matters would be greatly appreciated.</p>	<p>by the AAP's proposals is enabled to operate. How best to ensure this is regulated by law, and the Council is following this process to the letter. The Council fully appreciates the concerns the proposals cause, and is in active discussion with the RBL and the local tenant, including answers to each of the questions asked.</p> <p>The Council proposes no changes to the AAP in response.</p>
<p>Royal Yorkshire Yacht Club</p>	<p>AAP</p>	<p>First the Club accepts and welcomes the documents as representing a comprehensive planning scenario, and, specifically the rejection of a berthing facility solely within the Harbour. RYYC will do its utmost in assisting with the Regeneration of the Town and supports the efforts of the Council to achieve this. What is set out below is no more than our earnest plea for the timing and size of the Marina project to be able to play the role for which, after testing at Public Inquiry, it was found to be essential. We believe that a number of issues were successfully argued out at that time and to a considerable degree the Marina argument succeeded . There must be persuasive reasons for a</p>	<p>The Council welcomes the support of the Royal Yorkshire Yacht Club, and responds to the points made as follows:</p> <ol style="list-style-type: none"> 1. The number of berths proposed reflects up to date, best evidence of prospective demand for berths. The smaller number is also consistent with a reduced impact on the local environment, something the Council is

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		<p>departure from that hard won position and erosion of elements within the original scheme which could put at risk private investment. In offering the following commentary RYYC is attempting to highlight a number of factors which perhaps, at least in our view, might bear re-examination.</p> <p>1. In the section dealing with “lessons learned” (paras 5.64 et seq) RYYC would refer back to our earlier response to the (first) Preferred Options document in the following terms: <i>Although the Report acknowledges the Inspector`s conclusions on the importance of the Marina for regeneration , it does not reflect the forcefulness of his view (sic) that a Marina of the size and in the location proposed was the only scheme put forward before him which could contribute significantly towards regeneration of the town.</i> Is there a reason why the conclusion summarised above should not appear within this section as part of the response. RYYC is concerned at the shift towards a limit of 320 pontoon berths . This directly conflicts with the evidence led at the last Inquiry by both ERYC and RYYC , which served to convince the Inspector.</p> <p>2. Next, the footprint of the “ new build” ignores the effect on the amenity of the South beach which also figured largely in the Inspector`s conclusions and will be subject to scrutiny and criticism once more We would be interested to know if a “teardrop” design, with minimal land take at this point has been considered. It appears a possibility that the footprint is limited by this constraint, a problem which could be overcome, combined with a more aesthetically pleasing design and additional benefits for the beach at this point.</p> <p>3. In the Scoping Report it was stated that town centre redevelopment and the Marina were significant contributors to the process of regeneration and that one would not succeed without the other. Our concern is that later statements, although accepting the Marina as a vital element of the strategy, appear to fall short of the absolute nature of previous commitment, such as above. Indeed we are alarmed at a number of inferences suggesting the opposite, such as at page138 where it is accepted that the proposals for Burlington could be introduced at the harbour top “in advance of the construction of the Marina if need be”. At the least this implied phasing seems at odds with earlier statements as at page 136 -the commitment to a Marina makes it feasible to achieve a scale of regeneration investment that would not otherwise be possible. For our part we remain sceptical that commitment alone is not enough comfort for developers , viz the last time round!</p>	<p>concerned to minimise.</p> <ol style="list-style-type: none"> 2. The current proposals minimise the ‘take’ on the South Beach, while also ensuring the optimal ‘shape’ of the Marina all matters considered (wave wash and the like), including the relationship to the Spa. The Council and the Bridlington Harbour Commissioners (BHCs), with the assistance of their technical advisers, considered a range of options (including to minimise the take of the South Beach), and the best performing is the option promoted by the AAP. 3. The Council and its partners are committed to the Marina, and can reassure the RYYC on this point. The Council will ensure that the final draft of the AAP does not equivocate on this point. 4. The Council accepts that adequate parking is essential to the Marina’s success, and proposes to clarify the proposals in the final version of the AAP. 5. A hotel remains a primary objective, either on the Harbour Top as part of Burlington Parade or on the made land with the Marina. The Council and the BHCs are happy to consider the inclusion of a club house in the proposals, subject to financial considerations and the like. 6. The Marina is a public sector project. While the Council is concerned to optimise commercial funding for it, the primary aim is to secure the regeneration of the existing town centre. The previous proposals posed a risk of two competing centres; more recent evidence points to the pressing need to ensure that the

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		<p>4. The importance of vehicle parking for the Marina - perhaps this is included within the “operational needs” reference, whereas in previous outline schemes and documents its importance has been referred to in specific terms - as it is in the current document to meet the needs of the Trust Port (page 161). A successful marina depends on adequate parking as stressed on the last occasion within the Council’s evidence</p> <p>5. Hotel provision to support the Spa - will this be included within the reclaimed land in the Marina footprint which seems logical. -if so (and accepting the schematic nature of the outline) on both these last two provisions RYYC is concerned about the adequacy of the site. On this same theme, previously it was accepted that an important part of the Marina development would include a site for a new clubhouse. We hope that this remains a possibility.</p> <p>6. Which again leads to a further observation about the apparent shifting of profitable elements in the current proposals to the Burlington Parade scheme . As currently set out the only incentive for a developer is the housing provision. RYYC remains convinced that the Marina element will inevitably be developer led and to succeed must include a sufficient incentive.</p> <p>7. RYYC is concerned at references to the Financial interests of the Harbour Commissioners eg at page 162 where the following appears : --“and to create the Marina will leave the HC no worse off financially”. Having in mind the fact that berthing in the Marina will undoubtedly have this potential, we believe , in the light of past experience, that such repeated references are unnecessary hostages to fortune.</p> <p>8. In any event RYYC would like reassurance on the method used to establish the number of pontoon berths to be achieved, having regard to information previously given on the average size of craft which would be anticipated and an earlier draft plan showing some 160 berths (ie half the total) for craft of either 6 or 8 metres within the existing harbour. This is not to be construed as opposing this provision - indeed most craft owned by Members would fall into this size range. The fact remains that we are dealing with a different future with pontoon berths, departing from past experience where owners are unwilling to expose larger and more expensive craft to the rigours of mud berths and where in any event the recognised trend is towards larger boats It would be reassuring to know that the schematic plan area of available water has been “passed by” the RYA ,for the benefit of their considerable experience of the average mix of boats to be found in a Marina and the requirement for</p>	<p>Marina investment works to the advantage of existing businesses in the town centre too. In any case, Burlington Parade is also public sector-led and its feasibility also depends on private sector investment. Thus the Marina and Burlington Parade need to be planned with a clear view of the market’s ability to deliver both and to maintain the vitality of both.</p> <p>7. The Council can give the RYYC the reassurance sought; and will indeed seek the views of the RYA directly (though its advisors know these views and the proposals reflect them).</p> <p>8. The method used is the industry standard approach; the Council’s and BHC’s advisors are experts in their field of marina design.</p> <p>9. The design has been amended so that all Marina access is now through the lock gate at the Harbour mouth.</p> <p>The Council proposes no changes to the AAP in response.</p>

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		<p>increased circulation space. RYYC consider that demand will be manifest for larger berths by the end of the decade when the Marina will come on stream, so that a realistic provision based on the area of impounded water shown, is more likely to be in the order of 260 berths.</p> <p>9. Is it possible to move the half tide basin to the seaward end of the new enclosed area to take advantage of the deeper water and consequently less construction work to provide a level for a half tide gate.</p> <p>Conclusion. RYYC Would urge reconsideration of the siting and enlargement of the impounded area of water within the half tide basin; reassessment of the landside provision in the footprint area; and avoidance of conflict in the land take over the South beach by restricting this to the absolute minimum for access.</p>	
S Cunningham	AAP	<p>I suggest the people that have come from out of town to destroy Bridlington stop living in fairy land.</p> <ol style="list-style-type: none"> 1. Have they ever walked around town and looked above eye level – the state of upper buildings are an eyesore. I give Bridge Street as an example. Look up and see the rot. Why not have a good glean up, the whole area is filthy, even the streets, where are the street cleaners? And is it not just in summer before you jump on that band wagon. The swimming pool windows, look at them, disgusting! 2. Have an out of town shopping centre i.e. Carnaby expansion – Leeds has White Rose, Sheffield has Meadowhall, etc... An opportunity!! 3. Some of the houses you intend to destroy are peoples homes and some are obviously Victorian examples. 4. The existing train station is a delight. Someone goes to allot of trouble to make this happen. You do not get many trains all year round, less in winter – why alter a good thing? 5. Moving the coach station from Hilderthorpe Road. Is anyone going to bother returning to Brid when they find out what a trek it is from the new site – are you going to supply a free bus back into town? – I think not – the elderly will not walk it and mums with prams will tell you the same – one visit and that’s your lot – word gets around!! 6.The Marina – this has been going for a good 30 years – try living in the real world, you have a perfectly good harbour – improve it and clean it. The people who use yachts come for weekends etc. to sail and not shop – and not all year round. 7. The Seafront – this was paved and improved and was a very good job done – years ago – is it maintained? The pavement stones need cleaning, there is 	<p>The Council notes the comments and responds to the specific points as follows:</p> <ol style="list-style-type: none"> 1. The evidence shows that the most effective route to better building maintenance is profitable businesses. The AAP aims to create the conditions that will enable the whole of the town centre to thrive and prosper so that businesses in the town centre will become profitable enough for buildings to be maintained (including so that tenants pay rents at a level that will induce landlords to maintain their properties). 2. Out of centre shopping provision is contrary to national planning policy; the requirement instead is for continual improvements to established centres, including ensuring that town centres keep pace with the requirements of their catchments for a good choice of shopping and services that can be accessed easily by a choice of means of transport. 3. The AAP and SPD promote design that is in keeping with Bridlington’s distinctive character, both through restoring existing

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		<p>moss growing – the seating, has it ever been painted or varnished since? The children’s pools are full of sand, do they ever get cleaned in a morning?</p> <p>8. Finally – the existing shopping centre is dying, so why a new one – how many are empty? – if you can’t fill that, why? You should expand the old cinema eyesore where the bingo hall is. I know there was a nightclub below in years gone by – an ideal car park area. The list goes on...</p>	<p>buildings and in the design of new buildings. The Council regrets that the changes required to improve Bridlington’s fortunes have adverse effects on some individual businesses and householders; the Council nonetheless is committed to ensure that all those affected are wholly compensated in line with the law. The Council has continued throughout active consultations with all those affected.</p> <p>4. The train station will be enhanced by the proposals, and patronage should increase.</p> <p>5. The proposals include a bus interchange at the station which will provide for bus services over the very short distance to Chapel Street/King Street etc. Shopmobility provision will also be on site for those who wish to make use of it to access the rest of the town centre.</p> <p>6. The Marina proposals will include the regeneration of the Harbour which is in need of this investment. The evidence on the Marina shows that it will have a substantial beneficial impact on the performance of the whole of the town centre, helping to diversify the economy and enable its tourism offer to be competitive all year round.</p> <p>7. The Council accepts that maintenance is critical to successful regeneration.</p> <p>8. The evidence shows – notwithstanding the empty shops (not particular to Bridlington – the whole country is suffering from similar levels of vacancies) – that the only route to improving the town centre’s competitiveness is to increase and improve its retail offer. This is impossible to do within the existing footprint of the shopping core. The proposed site of the</p>

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			<p>new concentration of retail units is well-connected to the existing core along an already popular shopping street, where the AAP also includes proposals for widening the pavement and improving the quality of the public realm. The Council welcomes suggestions and ideas for improving the appeal of the established shopping core, and the AAP promotes, amongst other things, temporary uses for vacant shops.</p> <p>The Council proposes no changes to the AAP in response.</p>
S Stainforth	AAP	<p>There should be a dedicated youth centre for the young people of Bridlington, in the centre of Bridlington. This plan aims to provide for the community, and young people are a large section of that. Young People in Bridlington often says 'there's nothing to do', 'there's nowhere to go'. It is difficult for young peoples groups to tap into long term funding for projects. There is a huge need for more youth provision in Bridlington.</p>	<p>The Council agrees that facilities are needed for young people in the town centre. The AAP promotes the possibility of a youth centre as part of the new town square.</p> <p>The Council proposes no changes to the AAP in response.</p>
T & S Reeves	SPD	<p>We are particularly concerned that the character of the town is retained & its history highlighted. We look for retention & continuation of pantile roofing, Dutch gables & bay windows to reflect past trading & maritime activity. Ultra modern architecture of new shops and dwellings would not be in keeping with the town's character. The buildings alongside the Gypsy Race & harbour should be kept & restored, particularly the Old Mill (Tony's Textiles.)With creative thinking, The Mill & Sawmill Yard could be turned into an excellent educational tourist attraction, giving details of how the mill worked & its provision within the town - ship building in Clough Hole etc. We would like to see the funfair & arcades moved to South Side & the site redeveloped for adults to take full benefit of the sun & views across the Bay. The pedestrianisation of King St was a huge mistake because it runs east to west & acts as a wind tunnel in bad weather, we strongly object to it being turned into a bus station for the same reason and the fact that it would bring a high level of pollution into the town centre. It should be opened up again for parking & development of high quality individual small shops. A multi storey car-park for only 255 is a ridiculous idea unless it is accompanied by others, - re-house everyone in Ebor flats & turn it into a multi storey, plus park & rides on the</p>	<p>The Council agrees that the character of the town needs to be protected and enhanced, including through careful preservation of buildings that contribute to the historic townscape and through the introduction of well-designed new buildings that respect this character and add to the quality and distinctiveness of the town's appeal.</p> <p>The AAP includes a comprehensive approach to car parking provision in the town centre, of which the proposal for the 255 space car park mentioned is one part.</p> <p>The Council notes the comments and ideas on the Mill and Sawmill Yard; the funfair; King Street; Ebor Flats; and the proposals for cleaner streets.</p> <p>The Council proposes no changes to the AAP in</p>

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		<p>outskirts of town, all being supported by more inland trains. Everyone's aspirations for Bridlington to become a quality maritime resort again will not be realized & maintained unless by laws are passed & policed to keep the pavements free of goods for sale, free of litter particularly chewing gum & cigarettes. Every shop owner should be made to clean their pavement area & the streets should be cleaned during the night at high tide using the sea water from the harbour. Access to this comment site is not user friendly & demanding that people quote the Document & paragraph number is counter productive.</p>	<p>response.</p>
<p>Tesco Stores Limited</p>	<p>AAP + SPD</p>	<p>We write on behalf of our clients Tesco Stores Limited in relation to the above documents. Our clients operate an existing store in Bridlington which sits within the AAP area and have had discussions with the Council over a number of years regarding the potential to relocate their current operation onto the adjacent former coach park site.</p> <p>Whilst our clients are supportive of the general strategic objective of regenerating the town centre, meeting an identified retail need and stemming expenditure leakage from the area, and remain willing to work with the Council as a major stakeholder in the town, they have strong objections to the prescriptive nature of the document and consider it to be unsound under the terms of the guidance contained within PPS12 regarding coherence, consistency and effectiveness. As the AAP itself points out at paragraph 9, its proposals must be capable of delivery, flexible enough to respond to unforeseen changes and monitorable. This is not the case.</p> <p>The resultant policy framework for our client's site, which is one of the key retail anchors in the town, is that it will be replaced by comparison retail units and that, if necessary, this acquisition will happen by way of Compulsory Purchase (CPO) powers. It is assumed that the food store which will be located on the adjacent coach park site will be occupied by Tesco despite the fact that our clients and Council representatives have so far been unable to reach agreement on a scheme for the site due to its compromised nature and uncertainty regarding land required from Network Rail. In the meantime the policies of the AAP as drafted, effectively preclude our clients from making any sort of improvement to their existing offer on their existing site. This cannot possibly be sound, and in summary it is considered that many of the policies are too prescriptive and would stifle investment in the AAP area, contrary to the wider objectives of this document.</p> <p>In addition, the suggestion that the Primary Shopping Area (PSA) boundary may or may not include the existing Tesco site, dependant upon whether it is redeveloped in accordance with the Council's wishes, is not consistent with</p>	<p>The Council thanks Tesco for the comments, and notes that discussions are ongoing with a view to agreeing the details of the relocation and expansion of the Tesco operation. Many of the comments in the representation as a consequence have been overtaken by subsequent discussions; a provisional layout is agreed between the Council's advisors and Tesco's, and the Council's negotiations with Network Rail are positive and advanced. The Council does not therefore reply to these detailed points in the representation, but confines its responses to the planning points.</p> <p>As Tesco is aware, the Council has promoted the AAP and developed its strategy on the basis that Tesco wishes to expand its store; and that expansion on its present site, outwith the established Primary Shopping Area and poorly related to it, would be contrary to Council policy – saved policy and advanced AAP policy – as well as to PPS4 given the existing store's location and layout vis the established primary shopping area. The Council does not accept that the present store is a key anchor for the town centre. It is separate from the established Primary Shopping Area and poorly laid out in relation to it.</p> <p>The proposal for the definition of the Primary Shopping Area is predicated on the relocation of the Tesco store to the coach park site, and on the</p>

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		<p>Government guidance. In the interests of clarity the plan needs to define the PSA boundary definitively now; as currently drafted the document just provides uncertainty. Clearly, as the major foodstore anchor in the town, Tesco are of the view that their existing store should be classed as part of the PSA in any event.</p> <p>The deliverability of the Plan is questionable, as evidenced by the extension of the time period from 2016 to 2021. Whilst the current economic recession provides an easy justification for this, the reality is that the inevitable complex and costly CPO processes is the main factor in the timescale. There can be no guarantee that such CPO's will be successful. In the case of our client's site it would be necessary to demonstrate that its redevelopment for comparison retail units is compelling in the public interest. In our view this is not the case. Should Tesco wish to remain on their existing site, in either their existing format or to provide an improved offer, the seven defined objectives for Burlington Parade would not be compromised. Despite this, the more prescriptive policies contained later in the document and discussed below would result in such a redevelopment being contrary to local planning policy if adopted in their current form.</p> <p>We turn now to comment on the specifics of the document.</p> <p>Town Centre Boundary We support the proposed Town Centre boundary which includes the existing Town Centre area, the Marina, the Town Hall, Courts and other Civic uses and the train station and adjacent coach park area. We consider the Town Centre boundary proposed is appropriate in terms of area and the scale of retail and other Town Centre services this would support.</p> <p>Primary Shopping Area We support the identification of the Primary Shopping Area which proposes the inclusion of the existing Tesco Store (proposed to be redeveloped). We would however reiterate our comments above that the inclusion of the Tesco site being conditional upon its acquisition and redevelopment by the Council for comparison retail units does not provide clarity. The site is already appropriate for inclusion in the PSA by virtue of its distance from, and relationship to, the rest of the centre and by the fact that it is occupied by a prime retail anchor.</p> <p>Policy BridTC1 The context for this policy is set out in the preceding paragraphs as being "Assessing Risk" to the AAP's regeneration strategy. In our view Part 3 of the Policy, which effectively places an embargo on any alternative development, is unnecessary and unsound in that it provides no opportunity for flexibility within</p>	<p>redevelopment of the existing Tesco site for the concentration of the unit shops as promoted by the AAP. There is no case otherwise for including the existing store site within the PSA.</p> <p>The Council is confident that the AAP remains deliverable on the evidence and that the case for CPO remains robust and compelling in the public interest. The timescale for the plan's delivery takes the timing of a CPO and other orders into account; the change in the plan's period reflects the effects on the economy of the recession.</p> <p>Should negotiations fail for unforeseen reasons, and Tesco elect to remain on their existing site, the Council will locate the proposed concentration of units shops elsewhere within the Burlington Parade site, and develop the coach park site for other, non-retail, uses. The Council proposes to clarify the AAP delivery strategy at Publication Document stage to include 'triggers' (e.g., dates for securing agreements, planning consents and the like) which will prompt the pursuit of alternative options for securing the objectives for Burlington Parade. Clearly, these less preferred options are not set out in the AAP, the purpose of which is to set out a clear, preferred, strategy for delivering the AAP's regeneration objectives.</p> <p>Town Centre Boundary The Council welcomes support for the definition of the Town Centre boundary.</p> <p>Primary Shopping Area The Council does not agree that the existing store site should be included in the PSA, and refers Tesco to the definition in PPS4.</p> <p>Policy BridTC1 The Council proposes amendments to the AAP's</p>

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		<p>the plan. In addition it is also, to a lesser degree, a repetition of part 2a) of the policy. Government guidance requires development to be in accordance with the plan and regional and national guidance, it also requires there to be no harm to the development plan strategy. The use of the word 'risk' is in our view inappropriate and the preceding paragraphs do nothing to elaborate on what is meant. Paragraph 3.27 states that the Council recognises that circumstances may change and that there may be other development schemes 'not foreseen by the AAP' that could contribute positively to delivering the AAP objectives. It follows that if a scheme can be shown to contribute to the objectives, then it doesn't pose a risk and should be granted, always having regard to other key planning policies at all levels. This however fails to transpire into the current draft policy framework.</p> <p>Policy BridTC2 This Policy uses the same phrases regarding risk as BridTC1 and carries with it the same presumption against any development that is not as set out in the Plan. Over and above this the Policy is essentially a duplication of Policy BridTC1 and on that basis alone should be deleted.</p> <p>Policy BridTC3 We support the minimum requirement for 10% renewable energy. This level of on site renewable energy is already a policy requirement in many Local Authority areas, and moreover Tesco are committed to reducing energy consumption and CO2 emissions generally nationwide.</p> <p>We have concerns in relation to the minimum BREEAM rating of 'very good'. We consider this should be set at 'good' as a minimum, and 'very good' for larger development projects. This can be achieved either by a rewording of the policy, or an increase in the threshold to which the requirement applies.</p> <p>Policy BridTC4 We support the sentiments of this policy, but consider that its length and detail is far too prescriptive. Of particular note, is that much of the list is duplicated in the accompanying SPD which focuses largely on the design, appearance, layout, siting, height and massing of development in the AAP area. Additionally it is considered that setting out a policy criteria framework requiring buildings which are to be recognised by future generations as those which should be preserved poses a serious threat to the financial deliverability and ultimate success of the AAP. Whilst this might be acceptable for some buildings in the AAP area, it should not be applied to all as a minimum design standard.</p> <p>It is therefore considered that the policy could be reduced to 1; 2 (a), (b), (c) and (t); and 3 (a) and (b) which in our opinion would ensure an acceptably high</p>	<p>approach to risk to clarify what is meant, how it is to be measured, and the types of evidence that proposing developers will need to bring to bear if such schemes are to be permissible.</p> <p>Policy BridTC2 The Council proposes changes to remove duplication and aid clarity.</p> <p>Policy BridTC3 The Council proposes changes to clarify that the Council will take into account the effect on the viability of development proposals of achieving sustainability standards that are higher than those required by the applicable building regulations.</p> <p>Policy BridTC4 The Council proposes changes to the development management policies to reduce unnecessary duplication.</p> <p>Policy BridTC5 The Council proposes to retain this policy, but to clarify that the requirements will be proportion to the proposal, and to remove the requirement for consultation.</p> <p>Policy BridTC7 The Council proposes changes to clarify the approach; the Council maintains that a within-centre sequential approach in the context of a regeneration strategy is consistent with PPS4 (and notes the reference to this possibility in the Practice Guidance).</p> <p>Policy BridTC16 The Council takes the view that the proposal is in line with Circular 05/05, and points out that the policy provides for direct contributions where appropriate, takes into account the differential</p>

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		<p>standard of design, but also not appear as an unachievable list of criteria which could ultimately undermine the delivery of the AAP.</p> <p>Policy BridTC5 We consider that the preparation of Development Statements for sites should be a matter for discussion between applicants and the Council rather than the subject of a development plan policy. In particular the issue of public consultation and when it is appropriate / necessary is dealt with in the Council's adopted SCI and there is no need for a requirement to be placed on developers / landowners in the context of this document.</p> <p>Policy BridTC7 This policy does not accord with government guidance and is unduly detailed. Part 1 of the Policy is unnecessary. Government policy states that any development in an edge or out of centre site which does not accord with the development plan should be subject to the sequential approach, it does not distinguish in terms of size, likely catchment area or any other matter. Part 1 of the policy should be simplified to reflect this.</p> <p>Part 3(b)(i) of the Policy does not accord with the government's definition of edge of centre. Part 6 of the policy should be clarified to make clear that it does not relate to proposals within the Primary Shopping Area as any effort to control the range or type of goods within a defined centre runs contrary to national guidance.</p> <p>Policy BridTC16 We object to Policy TC16 on the basis that it is not consistent with the provisions of Circular 05/05 wherein contributions are necessary and relevant to the development in question. Instead the Policy is based loosely around a financial contribution per m2 of floorspace. Whilst the direct delivery and funding of those parts of the strategic public realm that lie within or adjoin a site may be appropriate, this should be considered on a site by site basis and not as part of a blanket threshold. The inherent difficulties associated with this approach and the mechanics of when and how payments are made is the very reason why the Government's Community Infrastructure Levy proposal has still not yet been finalised. Until such time as it is, contributions to public realm improvements should continue to be dealt with by way of s106 Agreements.</p> <p>Policy BridTC17 We support the sentiments of this Policy, insofar as it relates to the regeneration of Bridlington Town Centre.</p> <p>However we object to TC17(1), (2) and (3) which require that the</p>	<p>scale of impacts, and the effect of the charge on the viability of 'eligible' development proposals. The Council also notes the transition arrangements for tariffs of this sort in the regulations for CIL. The Council proposes changes to the AAP to clarify that the Council will remove the provision in line with the timing in the CIL regulations.</p> <p>Policy BridTC17 The Council does not accept that a loose 'flexible' site allocation, as opposed to the detail of a specific masterplan, is an appropriate approach to achieving the evidence-driven objectives for Burlington Parade. The Council proposes changes to clarify in the delivery plan that where trigger dates are not met, the Council will then consider alternative approaches. CPO confirmation is one of these triggers. PPS12 requires plans to prepare for the use of CPO powers, and the AAP does this; the use of these powers in this case is not a general provision, but to secure a specific regeneration scheme. As noted above, the Council and Tesco have now agreed a provisional layout that both conforms to emerging policy and meets Tesco's needs for an efficient store layout and format in line with Bridlington's market.</p> <p>The SPD The Council considers it critical to be very specific in relation to the design guidance for Burlington Parade, particularly in relation to the challenges of ensuring that the new supermarket has a positive effect on the listed station building and is appropriately related to the new station plaza and gateway to the rest of Burlington Parade and the town centre. Both are critical to ensuring the benefits of the scheme flow to the Town Centre as a whole, as well as meet Tesco's commercial</p>

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		<p>redevelopment must proceed as allocated on the AAP Proposals Map. We consider that this is an inappropriate statement, and that Policy TC17 should reflect the 'flexible' approach highlighted earlier in the document at paragraph 3.27. At present the Council are not in control of the land required to achieve this target, and therefore we consider it premature to outline bold policy requirements with no fallback position which would not allow other private sector development coming forward which would also contribute to the wider AAP objectives, in the absence of the Burlington Parade as currently configured.</p> <p>Although it is the intention of the Council to acquire sites by exercising Compulsory Purchase powers if required, it cannot be guaranteed that such powers will be successful, particularly where alternative development proposals are proposed which otherwise contribute to the AAP objectives. From our client's initial feasibility studies of assessing the opportunity for a foodstore on this adjacent site, it would appear that question marks over the ability of the site to deliver a foodstore of a suitable format.</p> <p>In particular, in terms of site assembly, any proposal seems highly likely to require an additional area of Network Rail land to the north, which there is no certainty of occurring. In any event, the resulting marginally larger site would require flexibility in the approach taken to developing the site and would also result in a substantial shortfall in car parking numbers. The level of car parking achievable is unlikely to be sufficient to service a store in this location, particularly if such spaces were also to be available for general town centre use. In addition to this, it is considered that the resulting store would be in an inferior location to that at present in terms of its links to other town centre uses. The accumulation of the above factors may render any foodstore scheme on this site unviable.</p> <p>Supplementary Planning Document The purpose of the Town Centre and Marina SPD is to sit alongside the AAP and provide design guidance in relation to the delivery of the development proposals set out therein. The document builds on and replicates design guidance in the AAP, and to this end, we consider that the design policies contained in the main AAP document should be deleted. Whilst we do consider that there are issues in terms of the level of design detail, materials and generally high quality of buildings required by the SPD guidance in terms of their affect on the delivery of the AAP, we consider that detailed comment on all individual aspects of the SPD guidance would not be relevant at this time given the fundamental issues with the AAP and its ability to be realised in its current form. In respect of the proposed Supermarket, as a general point, we</p>	<p>requirements. Tesco will be fully aware of the contentiousness of supermarket design in this type of situation. The Council is anxious to ease the process of securing planning consent for Tesco in this context. Clear design guidelines are a key means of doing so.</p> <p>The Council wholeheartedly welcomes Tesco's commitment to working within the strategy for Bridlington's regeneration in achieving its commercial objectives. Tesco will be aware of the very great support this strategy has secured; and that the strategy itself has been developed fully in consultation with the local community.</p>

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		<p>do not consider that definitive conclusions can be drawn at this stage on the store's design, orientation, massing and advertisements. It seems premature, in the absence of a detailed feasibility study, to over prescribe design guidance on any foodstore development. At this stage therefore the content at Paragraphs 7.13 – 7.16 serve as further evidence of the Council's application of a single minded and rigid approach to the AAP development.</p> <p>Summary We consider that the AAP should recognise that a substantially more flexible approach is required to realise the seven AAP objectives than that currently presented in the AAP policies and accompanying text. The opportunity for realising the AAP objectives decreases as the prescriptive policy approach increases. It follows therefore that the objectives of the AAP are unlikely to be realised in its current rigid format.</p> <p>We consider that our clients are in a strong position to proactively contribute to realising the AAP objectives where these are promoted through a rational Policy framework, and would welcome the opportunity to further discuss how this can best be progressed in an alternative format in the Council's, local residents' and Tesco's best interests. To this end, Tesco are ideally placed to contribute to the early redevelopment phases, acting as a catalyst for the wider AAP regeneration.</p>	
W Adamson	AAP	<p>Following the Public Exhibition yesterday, 9th September, at North Bridlington Library, I am writing to strongly oppose the idea of building a coach park at Limekiln Lane rather than as part of the new Park and Ride park. I have the following three points to express:-</p> <ol style="list-style-type: none"> 1) Large numbers of coaches parked on this site next to the sea will spoil the views and attractiveness of this area leading to the Flamborough heritage coast. 2) Coach movements in the surrounding quiet residential roads will be totally unacceptable. 3) Limekiln Lane appears to be outside the plans for the Area Action Plan, I only found out about this proposal because I asked about coach drop off points in the AAP. Is it true that responses to these two options (Limekiln Lane or Park and Ride) will decide the outcome? This seems very unfair because so few residents will be aware of what is being considered. 	Coach parking at Limekiln Lane is not part of the AAP. Any new provision will be subject to further consultation.
Yorkshire Forward	AAP	Thank you for seeking Yorkshire Forward's comments on the above document. We welcome the opportunity to comment on local planning policy formulation within the Yorkshire and Humber region as part of our role as a statutory	The Council welcomes the support of Yorkshire Forward, is grateful for its involvement throughout in the AAP's preparation; notes agreement that

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		<p>consultee. Yorkshire Forward is pleased to be working with East Riding of Yorkshire Council in the development of projects that aim to achieve the renaissance of Bridlington. The Bridlington Town Centre Area Action Plan (AAP) Preferred Options is generally well aligned to the Regional Economic Strategy (RES), we particularly welcome:</p> <ul style="list-style-type: none"> • The changes made to BridTC4 (Design and Built Environment) which now includes the topics (shop frontages, use of colours and textures, and the retention and enhancement of vistas) we raised as needing to be included within the list of issues requiring consideration when assessing the acceptability of designs. <p>We have identified a few areas within the consultation document where amendments could be made to further support the implementation of RES and assist, develop best practice. The following comments are made in response to Yorkshire Forward's role as a statutory consultee on Planning Policy in Yorkshire and the Humber, rather than as a partner in the development of the project.</p> <p>The Primary Shopping Area Opportunities presented by the potential relocation of major retailers are clearly recognised in the AAP. Shifting the limits of the primary shopping area retail core away from the seafront and towards the west of the town may result in larger retail stores that currently provide an 'anchor' for footfall relocating. Yorkshire Forward welcomes the Council's proactive approach in promoting new uses for properties that become vacant to mitigate against this possibility.</p> <p>It would be useful to make reference back to the strategic public realm plan to identify how the development of public realm can support and promote new uses as described in 3.14. Yorkshire Forward recognises the potential to promote redevelopment in response to the delivery of the public realm strategy and the timing of this is important in respect of phasing if this is to be delivered after the delivery of the Burlington Parade proposals.</p> <p>There are a number of references within the AAP to Yorkshire Forward supporting the delivery of the AAP and working in partnership with the Council. It is emphasised – as recognised within the statement in 6.13 – that any future funding for the delivery of elements of the APP will be subject to due process and the test for public sector and value for money must be satisfied.</p> <p>Employment Whilst we welcome the emphasis on improving the quality of the retail offer within Bridlington in order to help support economic regeneration, and to retain retail spend within the town; we also welcome the emphasis on the</p>	<p>the AAP is generally well-aligned to the Regional Economic Strategy; and notes that the changes made in response to YF's comments on the first Preferred Options Draft are acceptable to the Agency.</p> <p>In response to YF's further comments, the Council proposes changes to the AAP to:</p> <ul style="list-style-type: none"> ▪ increase further still the emphasis on small businesses and the role of the creative industries; ▪ clarify the development management policies, including the relationship between the different policies; and ▪ clarify that one of the purposes in designating the parts of the Strategic Public Realm (as opposed simply to promoting public realm in general) lies in a recognition of the role that public realm can play in improving the trading conditions of businesses and the appeal of a town centre. The delivery strategy already includes a phasing timetable for the delivery of the proposals.

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		<p>development of the small business base, including small office-based businesses through providing for high quality, well-specified small offices as part of the scheme. We appreciate that the strategy is closely based on the evidence on Bridlington's economy and future prospects, but suggest that there may be scope for additional emphasis on high value jobs, particularly those linked to the creative industries. Strengthening the emphasis on the creative industries within the AAP proposals would complement the objectives of strengthening the town's retail, and tourism offer.</p> <p>Housing We support the principal of focusing new housing within the Burlington Parade area; however, and we welcome the further emphasis on the provision of new market housing within the centre of Bridlington, including through the conversion of out-dated and poorly performing B&B and guest houses back to family use. We agree that a focus on market housing within Burlington Parade area would help to transform the range and quality of housing available within the centre of Bridlington, which would support the wider economic objectives of the AAP.</p> <p>Policy BridTC3 – Sustainability Objective 5c (ii) of the RES seeks to 'promote energy security and reduced fossil fuel dependency by more energy efficiency and clean and renewable energy generation'. Therefore, we strongly support the adoption of local planning policy that encourages, where practicable, energy efficiency and renewable energy generation in new development. To improve consistency between the policies in the AAP it would be helpful to rephrase Policy BridTC5 2g to read 'environmental sustainability, in accordance with BridTC3'. It may also be appropriate for the Bridlington AAP to consider the potential for renewables in accordance with PPS 22. The AAP should consider the utility provision throughout the AAP area, this supports RES Objective 5c (i), which seeks to 'make the most of private sector utilities and infrastructure development – including water and energy and join it up with renaissance programmes'.</p> <p>BridTC5 – Development Statements in the Town Centre Whilst we support in broad terms the approach outlined by Policy TC5; we feel that the policy would benefit from a link through to Policy BridTC3. In our previous comments on the AAP we suggested that the PolicyTC5 2g could be amended to read: 'environmental sustainability, in accordance with BridTC3', and we still consider that such an amendment would strengthen the sustainability elements of this policy.</p>	

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		<p>BridTC19 Public Realm in the Town Centre and Strategic Public Realm Framework</p> <p>We consider that it would be helpful if this policy included a link to Brid TC4 (Design and Built Environment), and there is also a need to reference the importance of creating a high quality public realm, which should also highlight the importance of using high quality materials and street furniture.</p> <p>Finally, I hope the above comments are helpful in shaping the Bridlington Town Centre AAP and look forward to future opportunities for involvement in the Local Development Framework preparation process.</p>	
<p>Yorkshire Water</p>		<p>Thank you for consulting Yorkshire Water on the Bridlington Town Centre AAP and Marina SPD. Please find our comments below.</p> <p>Page 79 Flood Risk and BridTC6– Surface Water</p> <p>Yorkshire Water supports the inclusion of a policy which ensures the use of sustainable drainage (SUDS) is investigated for every new development. One of the most important aspects of SUDS is to ensure that there is an appropriate adoption and management system in place. This issue should be clearly stated within the document to ensure SUDS is effective.</p> <p>Many Local Planning Authorities are now following the Environment Agency’s advice to reduce surface water flows by 30% on brownfield sites from the level prior to development to account for climate change. Rather than just keeping the status quo.</p> <p>Proposed Policy BridTC6 does not include effective management of surface water as paragraph 3.86 states it would.</p> <p>Housing - BridTC12</p> <p>Yorkshire Water works within the five year Water Industry standard Asset Management Plans (AMP), the current AMP runs until March 2010, with the next AMP running from April 2010 to March 2015. We have already submitted our investment proposals to OFWAT, our regulator, for the next investment period. Due to the uncertainty surrounding the Local Development Framework we were given figures by East Riding Forward Planning team for the number of new dwellings in Bridlington which totalled 1200 houses. This is the figure we have based our next investment period on. Therefore we can not guarantee the WWTW will have capacity to treat all the sites proposed in the AAP without phasing them into our next investment period (2015-2020).</p> <p>Supplementary Planning Document - Paragraph 3.8 Page 46</p> <p>Yorkshire Water supports the requirement for new developments to have appropriate surface water management systems. There should be a policy within the Supplementary Planning Document to ensure good surface water management practice is implemented.</p>	<p>The Council welcomes the comments and proposes changes to the AAP in response:</p> <ul style="list-style-type: none"> ▪ clarification of the proposals for surface water management to take into account the effects of climate change (obviating the need for a ‘policy’ in the SPD); and ▪ the phasing of housing development in line with Yorkshire Water’s industry standard AMP.

