

**Publication Bridlington Town Centre Area Action Plan (October 2010):**

**Statement of Representations, Regulation 30(1)(e)**

**Part 2: Summary of Representations on Soundness by Each Representor and the Council’s Response**

**Introduction**

Part 2 of the Regulation 30(1)(e) statement sets out a summary of each representation together with the Council’s response. Part 3 provides the subsequent correspondence by the Council with those whose representation

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RO1	Asda Stores Ltd (Planning Potential)		√	i. The proposal for the relocation of the supermarket is too inflexible; a second supermarket site allocation should be made.	Provide for an alternative supermarket site as well as the site allocated for the relocation of the Tesco Store.	The AAP proposes a single, evidence-based regeneration strategy. Providing for alternative supermarket sites would militate against the delivery of this strategy and therefore the achievement of its objectives. The Tesco relocation frees the optimal site for the unit shop scheme which is at the heart of the regeneration strategy. The AAP includes progress milestones that, if not met, will trigger a change of tack. CD01, para 6.17 sets the milestone: the heads of terms with the principal partners in 2011, which is on track; and para 6.14 lists the actions that could be taken were any one of the milestones not met. The single

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						strategy approach was considered reasonable by the Senior Inspector from whom the Council had a front-loading visit (CD09).
RO1 cont'd	Asda Stores Ltd (Planning Potential) Cont'd		v	ii. The convenience retail capacity forecasts are too conservative if based on the Roger Tym & Partner estimates; the England & Lyle figures better accord with Savills figures produced for Asda in 2009.	Use the England & Lyle figures; rely more heavily on expenditure into the catchment area from outside; and increase the capacity to provide for an alternative 5,050 sq m store with a 60/40 convenience/comparison split.	The description of the Roger Tym & Partners (RTP) retail capacity calculation is inaccurate (SD06, paras 6.8-6.28); the RTP convenience catchment <i>is</i> larger than the E&L assumed convenience catchment (SD06, Figure 5.1) de facto taking in expenditure from outside the smaller E&L catchment, but the survey still finds convenience retention to be 88%. E&L allow for £2.5m (2016), rising to £2.7m (2021) for expenditure inflow, including from visitors (SD08, Appendix 3, Bridlington). Savills' 2009 figures may be out of date, and if so, only coincidentally similar to E&L's 2010 figures.
RO2	Pamela Austin		v (para 1.10)	The proposals for removing parking on Quay Rd will make the Town Centre inaccessible by bus.	Leave some parking on Quay Rd to serve the Town Hall and the facilities around it, and allow room for cycles.	The representation misunderstands the proposals, which begin south of the level crossing (beyond the Town Hall section of Quay Road). Buses will continue to use Quay Road (CD01,

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						Plan 3.7), including to access the bus interchange in Parcel 1C (CD01, Plan 3.2); a new cycleway is proposed on Quay Rd (CD01, Plan 3.9). If parking is retained, the cycle route could not be accommodated and the pavement could not be widened to provide the additional capacity needed to support the expanded role of Quay Road/Prospect Street/Manor Street on the Primary Retail Circuit. There is already parking provision near to the Town Hall area and its facilities (CCD06, Figure 2.30) and the AAP (CD01, Plan 3.10) proposes new and expanded parking.
RO3	<b>Bridlington and District Civic Society</b>	√		Considers the proposals to be a genuine reflection of the wishes of Bridlington's residents.	N/A	Support is welcomed.
RO4	<b>Bridlington Harbour Commissioners</b>		√ (BridTC1 and BridTC2)	i. The strategy is not viable, and will have an adverse effect on the successful operation of the Harbour and Harbour Estate	Modify BridTC1 so that the regeneration strategy: <ul style="list-style-type: none"> <li>▪ BridTC.1 a) does not refer to specific works; and</li> <li>▪ BridTC1.b) makes no reference to the Marina, and provides</li> </ul>	The Council have worked with the Commissioners for many years on the AAP's proposals (CD19 provides an indication with reference to the principal meeting dates). The AAP explains why the Harbour Top development is an essential

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					<p>for a hotel so long as it is not within the Harbour on land 'which would detract from the operational requirement of the Harbour .</p> <p>Modify BridTC2 so that BridTC2a) promotes the regeneration of the town centre but excludes the Harbour Top; and b) regenerates the Harbour and Harbour Estate to support its operational activities and incorporate a new Marina.</p>	<p>catalyst to the Burlington Parade development (CD01 paras 1.44, 3.10 and 3.28 explain), which in turn is fundamental to securing the Town Centre's regeneration; and it sets out the Council's undertakings in several places that the works to the Harbour to introduce Burlington Parade into the Harbour Top are promoted solely on the basis that the Harbour operations (operational, commercial and statutory) will not be compromised and the works needed to ensure this are technically feasible (CD01: Executive Summary, para 36, 3<sup>rd</sup> bullet; paras 2,39, 3.32., 3.37, 3.41 iv), 3.42-3, 4.87, 5.11 3<sup>RD</sup> bullet and 5.14; and BridTC4.1 a). Para 3.42 sets out the details of the phasing works and replacement facilities to permit the Burlington Parade development on the Harbour Top; and 3.43 states that the Commissioners will also not be compromised financially.</p>
RO4	Bridlington		√	ii. The proposals are not	Not specified; or provide	The AAP sets out a full account of

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cont'd	Harbour Commissioners Cont'd			deliverable because the AAP has not provided guarantees on the funding for the Burlington Parade and Marina schemes.	concrete evidence that the public money for the projects is in place	the delivery strategy in CD01, paras 5.20-5.45 and 5.82-5.92. The Council makes the undertakings required of it in the AAP that it has, and has committed, the resources necessary to deliver the AAP's proposals. The Council is unable to set out the full details of its delivery strategy; doing so would compromise the commercial deliverability of the proposals. CD 18, No 74, page 25) explains that although the Council had planned to publish a more detailed delivery report (which sets out the estimate of the gap between development values and costs that the Council will cover, together with the basis of the calculations). But the Council decided that it could not issue this information without compromising the very deliverability of the delivery strategy is for. The Cabinet Report and Minute of 21 September 2010 provides an update of the financial position for the delivery of the AAP (LD14).

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						The Council and the Harbour Commissioners have jointly commissioned (March 2011) the Business Plan study for the Marina, at it will report in summer and autumn 2011 (the AAP refers, para 3.38, final bullet).
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		v (BridTC3)	<ul style="list-style-type: none"> <li>i. The Commissioners object to the statement that land is under-used on the Harbour Estate.</li> <li>ii. The Commissioners reject the evidence that there will be demand for the mix of housing and leisure proposed for the Harbour Top.</li> <li>iii. The Commissioners object on the basis that the funding for Burlington Parade is not guaranteed.</li> </ul>	None suggested.	<ul style="list-style-type: none"> <li>i. CD18.2, no 13, page 5, proposes a minor change to the AAP to clarify what is meant by under- and ineffectively used.</li> <li>ii. The Council is confident that the evidence of prospective demand is robust.</li> <li>iii. The Council is committed to financing the gap between costs and values in Burlington Parade, recovering the major share of its costs from land disposals together with contributions from the BridTC20 pooled S106 tariff. The Council makes this undertaking in the AAP at paras 5.14-5.16. The Council has set aside the resources, and has been working on, and keeping up to date, the</li> </ul>

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						commercially sensitive delivery strategy for Burlington Parade since 2007. The Council Cabinet minute of 21 September 2010 also sets this out (LD14).
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		v (BridTC4)	<ul style="list-style-type: none"> <li>i. The Commissioners object to the specificity of the 320 berths</li> <li>ii. The Commissioners consider the case for the Marina is not made out.</li> </ul>	An alternative 'marina' scheme within the Harbour only, excluding the regeneration of the Harbour Top (provided as Appendix 1 to the representation)	<ul style="list-style-type: none"> <li>i. The Council propose a minor change to alter this to 'about' 320 berths (CD18.2, no 42, page 15), although the Commissioners agreed the report that set this figure on 17 June 2008 (an agreed minute of the meeting).</li> <li>ii. The Commissioners have agreed a footprint and much else with the Council (the meetings are minuted, although the minutes are not published) and are continuing to work with the Council on the proposals, including for the Harbour Top as a first phase towards the delivery of the Marina. The within Harbour scheme would not achieve the transformational regeneration impact that the Council is committed to and which is</li> </ul>

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						feasible; and Burlington Parade is not deliverable, nor are beneficial spillovers for the regeneration of the established town centre core, without the regeneration of the Harbour Top.
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		√ (BridTC9)	The Commissioners object to a sequential approach in favour of sites which they consider not to be deliverable in the absence of 'guaranteed' funding.	None suggested (save for the implied removal of the policy)	The Council's response is the same as it is to the representations (above) that policies BridTC1-4 are neither effective nor justified, and therefore the AAP is unsound.
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		√ (BridTC10)	The commissions object on the grounds that the AAP regeneration strategy is not in any case deliverable, and therefore a policy which aims to protect an undeliverable strategy will damage local prosperity, businesses and commercial operations, including the Harbour; PPS4 says that policies should be positive and flexible; and the policy places onerous and unnecessary demands on potential applicants .	None suggested (save for implied removal of the policy)	The Council considers the proposals promoted by the sequential approach are deliverable. The Council proposes a minor post-publication change to clarify that the sequential approach is subject to the availability of suitable, available and viable sites in the sequentially preferable locations (CD18.2, no 59, page 21). The AAP promotes a specific strategy that is justified by robust evidence, including on deliverability; and flexibility is built in both through the BridTC10 mechanism and through the

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						schedule of 'trigger' milestones set out in the AAP (CD01, paras 6.17-6.19).
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		√ (BridTC11)	The Commissioners object that BridTC8.1 applies to all development regardless of size, on grounds that the criteria are too numerous and exacting, and therefore the policy is too inflexible.	None suggested – but implied either that there should be a size threshold so that the policy applies only to major development, or that there should not be criteria and instead a general requirement for development to 'improve the attractiveness and economic prosperity of the town'.	The Council considers the policy to be merited and notes that it is welcomed by Natural England, Environment Agency and English Heritage (who only ask for further strengthening). One of the greatest disservices to Bridlington's prosperity over the last two or so decades has been poor quality contemporary development; one of the greatest aims going forward is to improve that quality (working with developers using 'development management' approaches to do so) and to meet the Council's obligations for the highest achievable standards environmentally. BridTC8 lists the considerations that determine whether the other parts of the policy are met.
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		√ (BridTC12)	The Commissioners consider the requirement for Development Statements to be onerous, and that pre-application discussions		The Council maintains the usefulness of this approach for major schemes (which are very rare in Bridlington); and the AAP

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				are adequate.		(CD01, para 4.66) states that the Council will be proportionate in implementing this requirement.
RO4 cont'd	Bridlington Harbour Commissioners Cont'd		√ (BridTC13)	The Commissioners consider the policy to be at fault because the AAP allocates the Harbour Top for 'town centre' uses.	Remove the Harbour Top from Burlington Parade (as proposed for BridTC1-3)	The Council considers the policy an appropriate, locally apt, development management policy for Bridlington Town Centre in the context of the AAP's strategy and proposals.
RO5	<b>Bridlington Town Council</b>		√ (BridTC6)	The Fun Fair should be removed from the Seafront	None suggested; implies a change of strategy for BridTC6 to require the Fun Fair's relocation.	CD20.3 provides a full response by the Council to the Town Council's representation. The AAP (CD01, paras 3.66-3.69) explains that it had not proved feasible to relocate the Fun Fair; and that the first step is to create the conditions that will encourage Seafront businesses to cater for more year-round markets.
RO5 cont'd	Bridlington Town Council cont'd		√ (BridTC4)	The 200 housing units are not needed; and until the Business Plan [sic] for the Marina is done, it cannot be known how much made land is needed for the Harbour's operation	Implied that the housing allocation should be removed from BridTC4.	The reasoning for the AAP's provision for up to 200 housing units in conjunction with the Marina is explained by the AAP (CD01, para 3.39, 4 <sup>th</sup> bullet) and is justified both by the projected population growth in the town (CD01, Appendix 1, para 84) and the tourism role of the town generally and the tourism purpose

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						of the Marina particularly. While the Business Study will refine the basic footprint of the Marina, it is not needed to determine the approximate area of reclaimed land needed for the Marina's operation. The 200 housing units on the reclaimed land have no bearing on the operations of the existing Harbour.
RO5 cont'd	Bridlington Town Council cont'd		√ (BridTC5)	The Town Council considers that Prince Street is the preferred location for a new Town Square	Implied that the new Town Square should be relocated.	The Prince Street option was considered but was discounted (although it is a further option in time as C01, BridTC6 makes clear). Queen Street is already part-pedestrianised, adjoins the Harbour and Bridge Street; and in this location, the new Town Square binds the Harbour and Burlington Parade to the established core of the Town Centre. The further benefit of this 'binding' is to maximise the beneficial spillovers of the new investments for the established core. Prince Street cannot deliver these benefits which is the first priority, although as CDO1, paras 3.70-3.71, there are opportunities

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						to be progressed in the Prince Street area.
RO5 cont'd	Bridlington Town Council cont'd		v (page 68)	The Town Council objects to the proposal to remove on-street parking and control servicing hours in the established shopping area on grounds that it will disadvantage the elderly; and that the removal of seasonal parking will disadvantage year round residents.	Implied that the proposals should be dropped.	The AAP's justification in evidence for the proposals is substantial (CD01, paras 3.89-3.90 summarise it). The AAP explains that the changes will retain disabled parking, will not be implemented until compensating, conveniently located parking is delivered, and the proposals will have to be consulted upon when Traffic Regulation Orders are made (CD01, para 3.95). The whole of the AAP's strategy is focused on making Bridlington better for its residents – including attracting into the Town Centre the majority who choose to shop elsewhere (explaining the 27% retention of comparison goods expenditure from the catchment).
			v (page 46)	The Town Council assumes that Palace Car Park is 'restricted to 250 spaces', and suggests that a multi-story car park instead should be located on the Coach Park site (plot 1 A in the AAP's Plan 3.2, the Burlington Parade Masterplan)	Change of policy for Parcel 1A in the Burlington Parade Masterplan	The parking numbers at Palace Car Park are not restricted. The Coach Park site will have up to 700 spaces for public use as part of the supermarket development.

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RO5 cont'd	Bridlington Town Council cont'd		√ (page 63)	King Street should be opened to all traffic, as should Queen/Bridge Streets.		The Council is not proposing these measures; instead the aim is to reduce congestion and the impact of traffic on the quality of the user experience in the established core. The evidence in favour of this is substantial. The AAP (CD01, Plan 3.7) shows the proposed traffic routing – which downgrades all the streets in the established core. King Street is not shown as re-opened.
RO5 cont'd	Bridlington Town Council cont'd		√ (page 88)	The Town Council is concerned that contemporary design could spoil the Town Centre.	Implied that any reference to 'contemporary' architecture should be removed.	The Council proposes a minor post-publication change to explain that well-designed contemporary buildings should be sympathetic to the town's historic character and fit within their townscape (CD18.2, no 20, page 8). Detailed design guidance for meeting this consideration is set out in the Draft Town Centre and Marina SPD (2009)
			√ (pages 62 and 84)	The Gypsy Race is not capable of handling the needed storage capacity; and the additional 800 dwellings will increase flood risk.	Implied that the proposals for the Gypsy Race should be foregone, and the housing removed from the strategy.	The Council has agreed an approach to the Gypsy Race with the Environment Agency; is content that, subject to the measures put in place by the AAP (BridTC3, BridTC4 and BridTC11),

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						plus the minor post-publication changes (CD18.2, no 29, page 11), the Burlington Parade development will not increase flood risk elsewhere in the AAP area (and indeed the works to Gypsy Race should reduce flood risk overall); and Yorkshire Water is investing in substantial additional storm water capacity in the Town Centre. The rationale for the housing is set out in the AAP (CD01, Appendix 1, paras 84-95; and in the body of the AAP at CD01, para 4.101).
RO5 cont'd	Bridlington Town Council cont'd		√ (pages 61)	The Town Council wish to include provisions for an Olympic swimming pool in the AAP .	Add a policy requirement	The AAP (CD01, para 3.77-3.78) explains that the plans for Leisure World will be consulted upon when the Council has prepared options for the site and the swimming pool. No changes are required to BridTC6 should it be feasible to promote an Olympic swimming pool in the AAP area, on the Leisure World site or elsewhere.
RO5 cont'd	Bridlington Town Council cont'd		√ (pages 62 and 84)	The Town Council considers the housing numbers too high and unnecessary on grounds that	Reduce the housing for Burlington Parade of up to 600 units to a more	The justification for the housing numbers is set out in the AAP (CD01, Appendix 1, paras 84-95),

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				there is already adequate housing choice, and more housing will flood an already over-supplied market.	'reasonable' number	and the reasoning for their inclusion in Burlington Parade is set out in the AAP (CD01, para 2.18-2.19 plus the objectives to be achieved by Burlington Parade at para 3.5).
RO5 cont'd	Bridlington Town Council cont'd		√ (page 47)	The Town Council wish to see the Coach Park site retained and developed for coach and car parking	Remove the proposals for the redevelopment of the Tesco store on the site	The Council justifies the proposals with reference to the evidence base, summarised in CD01 Appendix 1, paras 48-83; para 3.5, 3.10 in the context of Burlington Parade; and the written justification for BridTC13 in CD01, paras 4.74-4.78. The Coach Park site is also too far from the established shopping core to serve as the principal car park for the Town Centre; seasonal parking is provided for at the Park and Ride; and coach layover will be replaced at one or other of several options on the edge of the Town Centre (the Council proposes a minor change to the draft Supplementary Planning Document to clarify this - CD07, change no 33, page 20).
RO5 cont'd	Bridlington Town Council cont'd		√ Re Beck Hill	The Town Council would like Beck Hill kept as it is.		The Council needs to take advantage of Beck Hill to divert traffic away from the Town Centre

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						core. Removing the traffic incursion is a key aim of the strategy and an essential measure, on the evidence, for removing one of the causes of the town centre's current malaise (and continuing decline as a shopping centre). The character of Beck Hill will be retained as far as possible. Further improvements will become possible to the character of the Bridlington Quay Conservation Area to the south.
RO5 cont'd	Bridlington Town Council cont'd		√ Re Tesco and Railway Station Plaza	The Town Council does not believe Tesco will relocate.	Remove references to the Station Plaza	The Council is in detailed negotiations with Tesco, and believes Tesco wish to comply with the AAP's proposals.
RO5 cont'd	Bridlington Town Council cont'd		√ Re 'chain stores'	The Town Council does not believe that further shopping development to attract multiples into the town centre will do other than harm existing shops.		The evidence is compelling; new shops are the only way of recovering the town centre's competitiveness as a principal town shopping destination. The evidence is set out in CD01, Appendix 1, paras 48-71 and para 83; and in para 4.70. The Council fully acknowledges that countervailing measures are needed to ensure the impact on the existing shopping area is

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						managed. The AAP (CD01) acknowledges this in the provisions for the Harbour Top as part of Burlington Parade (BridTC3) adjoining the established shopping area, and the Strategic Public Realm (BridTC5), which includes both the landscape scheme for defining the Primary Shopping Area and the New Town Square that adjoins the established shopping area.
RO6	<b>Britannia Court Residents Association</b>		√	Object on basis that the AAP proposes restricted access to the flats at Britannia Court		The AAP does not propose any restriction to access to the flats (instead encourages more development for residential uses on the Seafront – CD01, BridTC6)
RO7	<b>Burton Agnes Parish Council</b>	√		No comments other than finding the AAP sound		
RO8	<b>The Coal Authority</b>	No comment	No comment	No comment		
RO9	<b>Collette Tyler School of Dance and Theatre Arts (Mrs Collette Dale)</b>		√	The dance school built is new and purpose built, was financed by government grant aid and is used by 400-500 adults and children per week: no demolition or alterations are acceptable. Also object to the 'demolition' of the shops on Quay Road that also	None suggested.	The dance school and Quay Rd shops are within the comprehensive development area, and on part of the site designated for the unit shop scheme (CD01, Plan 3.2, parcel 1C; BridTC3.2a). The Council has discussed with the dance school the implications and

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				provide services to the public. Why demolish occupied premises when there are so many vacant properties?		is considering relocation of this use within the scheme or equivalent reinstatement nearby close to the existing location and the schools whose students walk to the existing facility. CD01 paras 3.4-3.8 explain the need for a comprehensive approach to Burlington Parade; paras 5.28-5.35 explain the CPO process, the Council's efforts to acquire by agreement, and the Council's awareness of the effects on businesses and the concern to minimise them.
RO10	<b>Communities Against Toxics (Barry Robinson)</b>		√ Sustainability Appraisal Report and AAP, Appendix 3 – Non-technical Summary	Although the AAP promotes sustainable waste management, the Sustainability Appraisal Report (SAR) is inaccurate in its statistics on waste arisings. Corrections need to SAR pgs vi, viii, ix, 1.15, 4.2, 8.1, 8.4, 8.6, 20; and to AAP, Appendix 3, Non-technical summary, pgs v, 20-24, 134 and to related strategic objectives.	Make the corrections needed in the SAR and AAP Appendix 3, Non-technical Summary. Use data for Bridlington, not the East Riding as a whole.	The Council proposes to make the changes requested (CD18.2, change no 77, page 26); and in CD18.3. The Council welcomes the recognition that the AAP's policies promote and provide for sustainable waste management.
RO11	<b>Dalley, Pamela</b>		√	The Fun Fair should be located somewhere else if Bridlington is to succeed in attracting sailors and higher spending visitors.	Promote the relocation of the Fun Fair.	The Council accepts that there may be alternatives, but that it will take time to effect a change (AAP, CD01, paras 3.66-3.69).

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				Otherwise wholeheartedly agree with the plan except for the AAP's failure to promote the relocation of the Fun Fair.		The Council welcomes the support for the rest of the plan.
RO12	Down, Shlomo		√ Sustainability Appraisal Report	Serious misgivings as to the soundness of the baseline data and projections of waste arisings. Housing densities do not equate to net increases in waste arisings. New residents will require a choice of facilities for managing waste. Correct the errors in the Sustainability Report pgs 129,187, 242.	Make the corrections needed in the SAR	The Council proposes these changes in Proposed Changes to the Sustainability Appraisal Report, CD18.3.
RO13	Dowson, David	√		Plan addresses well-documented problems of a 'decaying seaside town'; has been involved with regeneration in Bridlington for many years; the plan combines the wishes and hopes of the vast majority of residents; and his business provides services to 2,000 businesses and individuals and he knows of no one who does not wholeheartedly support the proposals; is concerned that the Town Council claims to represent the community's wishes but believes this not to be the case as		The Council welcomes the support.

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				councillors elected on less than 20% of voter turnout.		
<b>RO14</b>	<b>East Yorkshire Chalk Rivers Trust (David Croft)</b>		v (solely in relation to passage of migratory fish)	The Gypsy Race may support the passage of migratory fish (sea trout, European eels, lamprey) but the AAP makes no specific mention of this.	Proposes that provisions be made to open the proposed Marina lock for an hour either side of high tide to allow the passage of migratory fish. Prevent the build up of debris in the Race.	The Council is alive to the habitat potential of the Race. The AAP (CD01, para 3.10.ii) sets as a key objective of Burlington Parade to protect and enhance the habitat value of the Race, and the draft SPD (CD06, paras 3.11-3.12) explains these proposals. Burlington Parade and the Marina are both developments that will, at planning application stage, be subject to the Environmental Impact Regulations. The Council has already commissioned an initial habitat survey that will report in May 2011 (with further surveys to follow of particular species); the finished document will be published. As of March 2011 (draft report), no evidence (EA survey 2010) had been found of sea trout, only minnows, and concluded there is only a limited likelihood of lamprey. Further survey work is recommended for June and July 2011, and the Council intend to commission it.

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RO15	English Heritage	√ (para 2.5)		Vision, para 2.5, is welcomed for the recognition that the town's historic character can make an important contribution to its regeneration.		Support is welcomed
RO15 cont'd	English Heritage cont'd	√ (Strategic Objectives 5,6 and Enabling Objective vi)		Strategic Objectives 5, 6 and Enabling Objective vi. are supported for acknowledging the value of heritage and its conservation and enhancement, and the role that a network of new and enhanced public spaces will play.		Support is welcomed
RO15 cont'd	English Heritage cont'd	√		BridTC1 is broadly supported for its value in achieving the strategic objectives in respect of heritage conservation and enhancement.		Support is welcomed
RO15 cont'd	English Heritage cont'd	√		Para 2.37 (i) is supported for the correct identification of the key issues to be tackled in dealing with the causes of the town's underperformance		Support is welcomed
RO15 cont'd	English Heritage cont'd	√ (BridTC3.2b,2 c)		BridTC3.2b and 2c are supported for their usefulness in achieving the strategic public realm and heritage objectives		Support is welcomed
RO15 cont'd	English Heritage cont'd		√ (BridTC3.c)	BridTC3.c is unsound because the policy does not take into account the provision of PPS22 which	Recognition that it may not be possible for all new buildings in Burlington	The Council proposes a post-publication minor change (CD18.2, no 40, page 15) to add flexibility

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				states that consent for renewable energy projects should only be granted where the objectives of a heritage asset designation would not be compromised.	Parade to achieve 30% of their energy from renewable sources.	where there are heritage assets considerations. That may militate against achieving the 30% standard.
RO15 cont'd	English Heritage cont'd		√ (BridTC4.1e)	BridTC4.1e is unsound because inadequate use is made of the PPS5 terminology in respect of the effect of the developments on the significance of the heritage assets, and reference is needed also to the Conservation Area designation.	Amend criterion 1 (e) to read 'conserve those elements which contribute to the significance of the listed north and south piers and that part of the Bridlington [Quay] Conservation Area.	The Council proposes to make this minor post-publication change (CD18.2, no 51, page 19).
RO15 cont'd	English Heritage cont'd		√ (BridTC4, part)	BridTC4 is unsound because it does not require a PPS5 HE9 assessment of the impact of the Marina and Harbour Top proposals on the significance of the listed structures and Conservation Area	Carry out this assessment and include the outcome in the reasoned justification for BridTC4.	The Council proposes to make this minor post-publication change (C18, no 49, page 18). However, the Council proposes to do the actual assessment as the detailed work progresses to influence the final design decisions; and the final assessment will be part of the work under the EIA regulations for securing planning consent.
RO15 cont'd	English Heritage cont'd	√ (para 3.58)		The objectives for the public realm are welcomed.		The support is welcomed.
RO15 cont'd	English Heritage cont'd	√ (BridTC5)		The policy for the Strategic Public Realm is supported.		The support is welcomed

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RO15 cont'd	English Heritage cont'd	√ (para 3.79)		The objectives for the Seafront are supported.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (BridTC6)		The policy for the Seafront is supported.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (BridTC7)		The policy to reduce the impact of traffic on the town centre and the setting of the listed Christ Church is welcomed.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (para 4.50)		The proposals to improve the quality of the built environment are welcomed.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (para 4.52)		The proposals to improve the setting of listed buildings are welcomed.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (BridTC11)		The policy is supported, most particularly the recognition of the contribution that the reuse of existing buildings can make to environmental sustainability.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (BridTC20)		The policy is supported, particularly the proposals for the S106 scheme to secure contributions to the Strategic Public Realm.		The support is welcomed
RO15 cont'd	English Heritage cont'd	√ (page 140, Table 6.1)		Support subject to the correction (not Natural England, but English Heritage as the Source of		The correction needed is noted.

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				Monitoring).		
RO15 cont'd	English Heritage cont'd		√ (Appendix, omission of PPS5 conformity)	The statement of compliance with PPS5 is omitted, but is essential, particularly with reference to PPS5 Policy HE9.		The correction to this omission is set out in CD18.2, no 76, page 26.
<b>RO16</b>	Environment Agency	√		<p>The AAP would benefit from strengthening:</p> <ul style="list-style-type: none"> <li>i. Further explanation of the flood risk proposals at paras 1.40 and 1.44</li> <li>ii. Further explanation of flood risk measures in respect of Gypsy Race, para 3.10ii and clarify ix</li> <li>iii. Additional text on Flood Risk, para 3.46</li> <li>iv. Reference to the additional flood risk work at BridTC4.3</li> <li>v. Additional text, BridTC6</li> <li>vi. Clarification on SUDS proposals, para 3.60</li> </ul> <p>Specific support for:</p> <ul style="list-style-type: none"> <li>Para 3.19</li> <li>Para 3.35</li> <li>BridTC6, with further strengthening</li> </ul>		The Council proposes minor changes in response to each of the Environment Agency's suggested additional commentary, CD18.2, nos 12 (pg 5), 16 (pg 7), 29 (pg 11), 32 (pg12), 48 (pg 18), 53 and 55 (pg 20) and 63 (pg 22).
<b>RO17</b>	<b>Foster, Phyllis</b>		√	Objects to the proposals for removing on-street parking; that	Turn King Street into a through street, with	The Council considers the evidential case for removing the

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				it's removal will encourage her to travel to out of town supermarkets. The AAP is promoting the interests of tourists and not visitors.	parking as provided in Prince Street.	incursion of traffic and parking in the core of the shopping area to be compelling (CD01, paras 3.89-3.90 summarise the case); the AAP explains that the changes will retain disabled parking, will not be implemented until compensating, conveniently located parking is delivered (CD01, para 3.92), and the proposals will have to be consulted upon when Traffic Regulation Orders are made (CD01, para 3.95). CD01, para 2.6, explains that the aim of the AAP is to improve the value of the Town Centre to residents first – and tourists second – recognising if the Town Centre is competitive for residents, it will also appeal to visitors.
RO18	Gresham, Gordon		v	<ul style="list-style-type: none"> <li>i. The emphasis on shopping as a route to regeneration is unsound.</li> <li>ii. The Marina was, but is no longer, promoted by the AAP as the principal driver of regeneration (now is shopping).</li> </ul>	<ul style="list-style-type: none"> <li>i. Ensure the Marina takes priority as it is the only known source of demand.</li> <li>ii. Rejuvenate the existing town centre as set out in the adopted local plan.</li> </ul>	<ul style="list-style-type: none"> <li>i. The shopping is one strand of the AAP's proposals (CD01, para 35, and BridTC1-8). The evidence base for the strategy is set out in CD01, Appendix 1; the retail evidence – all based, on full household surveys – is set out in the 2006 RTP retail</li> </ul>

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				<ul style="list-style-type: none"> <li>iii. The aging and less wealthy population cannot support additional shopping, and the England &amp; Lyle study did not carry out a proper shopper survey.</li> <li>iv. There is no business plan for the Marina, and therefore it cannot be certain it will be deliverable.</li> <li>v. The strategy is driven by European Regional Development Fund bidding criteria.</li> <li>vi. The Council, if it is to use public money to subsidise incoming retail businesses, should set out the proposals clearly and cost them in advance.</li> <li>vii. Apart from the improvements to the shopping centre and the Marina there are no proposals for increasing visitors and no explanation as to why numbers have declined.</li> <li>viii. The proposals for removing</li> </ul>	<ul style="list-style-type: none"> <li>iii. Make provision for a new supermarket.</li> <li>iv. Fully set out the financial costs.</li> <li>v. Build more beach chalets.</li> </ul>	<ul style="list-style-type: none"> <li>study, the 2009 England &amp; Lyle (E&amp;L) Retail and Town Centres Study, the RTP 2010 update and the E&amp;L 2010 update.</li> <li>ii. The Marina is a priority – one of two major development projects promoted by the AAP (CD01, para 36 and BridTC4).</li> <li>iii. The retail evidence sets out the capability of the population to support further retail development; and the proposals are within the evidenced capacity.</li> <li>iv. The business plan is not the determinant of the Council's commitment to funding it. CD01, Executive Summary para 37, and para 5.16 in the body of the AAP, explain.</li> <li>v. This is not correct. The Bridlington Regeneration Strategy 2004 (CDX), updated 2007 (CDX) explains this. CD01, Appendix 2 summarises the evidence basis for the Strategy.</li> <li>vi. The Council justifies its</li> </ul>

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				<p>on-street parking will discourage visitors.</p> <p>ix. There is no financial assessment of the costs of the AAP, nor estimates of what investment is required from the private sector.</p>		<p>expenditure through the AAP process and through its political mechanisms. The Council's Cabinet Report and Minute of 21 September 2010 (LD14) sets out an up to date summary of the project's financial assumptions.</p> <p>vii. All of the proposals are indirectly aimed at promoting increased visitor numbers. CD01 Executive Summary, para 33 and para 1.10 in the main body of the AAP explain.</p> <p>viii. The evidence shows the contrary. CD01 explains at paras 3.89-90 and Appendix 1, paras 105-108.</p> <p>ix. The AAP provides for a new supermarket (C01, para 3.11, 1st bullet)</p> <p>x. The expected investment from the private sector is driven by the evidence on prospective demand, summarised in CD01, paras 1.20-1.32 and Appendix 1, paras 48-95.</p> <p>xi. The AAP does not preclude</p>

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						beach chalets.
RO19	Guildford, Barry		√	<ul style="list-style-type: none"> <li>i. The AAP is wrong because it does not focus on tourism, which is the town's single largest job-supporting industry.</li> <li>ii. The development of the Coach Park site will leave the coaches without layover facilities to the harm of the town's tourism trade.</li> <li>iii. The proposed unit shop scheme constitutes an overly large 'retail park' which is a half mile from the present centre.</li> <li>iv. Although the proposals for Gypsy Race are appealing, the provisions for housing and town houses are excessive.</li> <li>v. Parcel 2B should remain a parking use.</li> <li>vi. Parcels 3A and B should be for major retail because they are closer to the established shopping core.</li> <li>vii. Parcel 4 proposals are vague, and there is no need for the</li> </ul>	None suggested; implied a change of strategy is needed for the parts that cause concern is needed.	<ul style="list-style-type: none"> <li>i. The AAP concludes that evidence shows that, with the refurbishment of the Spa and the creation of the Marina, the priority is to improve the appeal of the town centre, starting with improving its poor performance in attracting expenditure from the catchment area (CD01, paras 1.13-1.17 summarise briefly). The Regeneration Strategy (LD01, Table 3.11 and para 3.52) found, applying the definition of tourism employment used by the South West RDA (a regional that is very dependent on tourism) that just 5.7% in 2005 (down from 6.4% in 2001) of Bridlington's employee jobs are tourism jobs (about 2,150 jobs in 2005, including part-time and self-employed jobs). C01, Appendix 1, paras 10-13 and paras 40-42, also explain. Bridlington's relative</li> </ul>

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				<p>form of development that will end up blighting existing businesses.</p> <p>viii. The established town centre has suitable sites for its expansion, though imagination and work are needed to establish them.</p> <p>ix. The 700 additional parking spaces are the Tesco spaces so will not add to the centre's parking facilities.</p> <p>x. The proposals for traffic circulation are not reasonable, most particularly the use of Chapel Street.</p>		<p>strengths include the relative diversity of its economic structure compared to many seaside towns. This diversity is something to build upon and develop further.</p> <p>ii. Coach facilities will be provided elsewhere within or adjoining the Town Centre (clarified in CD07, no 33, pg 20).</p> <p>iii. The unit shop scheme is an extension of the established primary shopping area, and immediately adjoins the primary frontage designated by the adopted Local Plan. The site is 310 metres (0.19 of a mile) from the top of Chapel Street.</p> <p>iv. The proposals reflect the housing market and prospective demand evidence, summarised in C01, Appendix 1, para 84-95, coupled with the purposes and objectives for housing at para 4.101 and 4.104.</p> <p>v. Parcel 2B includes the</p>

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						<p>redevelopment and expansion of the surface Palace Car Park.</p> <p>vi. Parcel 3A and 3B were considered for this use, and concluded as sub-optimal by virtue of the size and location of the sites, the existence of listed buildings and prospective traffic impacts.</p> <p>vii. The development is a critical catalyst to the development of the whole of Burlington Parade, and has been carefully considered. The land is also used for a significant level of surface parking, and technical work shows the scope for rationalisation. C01 explains at paras 2.30, 3.5.v and 3.10iii.</p> <p>viii. The existing town centre was fully considered for site options but was dismissed. The disruption and cost entailed, coupled with the impact on the area's historic fabric, coupled with a need to shift the shopping core to the west away from the Seafront,</p>

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						<p>precluded this option. The First Preferred Options Draft AAP (CDX) explains this at Appendix 7, para 16.</p> <p>ix. The estimated net addition in the number of parking spaces is not related to the Tesco provision, which excluded from the calculation. Instead the increases are a mix of the new multi-storey car park with the unit shop scheme, and the expansions of spaces at Palace, Beck Hill and the Harbour Top. C01 para 3.98 explains.</p> <p>x. The traffic circulation proposals have been considered by the Transport Assessment (C0X), and the changes required will also be subject to further consultation (C01, para 3.95).</p>
RO20	Health and Safety Executive	No comment	No comment	No comments		
RO21	Homes and Communities Agency	√		The HCA support the delivery approach, and the recognition of the role the Council will have to		The support is welcomed.

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				play to enable the delivery of the AAP's proposals; and the HCA will continue to support the approach and Bridlington.		
RO22	Hudson, Rick	√		The plans in general are a major step forward and should be pursued with vigour. The Marina should go ahead, though there may be delays for archaeological surveys. New parking needs to be in place before on street parking is removed. More work is needed on the traffic circulation.	None suggested, but implied that clarification is needed that on-street parking will not be removed until alternative provision is in place.	The Council welcomes the general support. The Council is committed to delivering the Marina. Proposed Post-publication Changes Part 2, page, proposes to clarify that on-street parking will not be removed until replacement provision is delivered in the proposed off-street parking facilities. The Council is confident the proposals for traffic circulation will work, based on the Transport Assessment and Vissim modelling (CDX). Further consultation will be carried out in conjunction with the proposals to restrict off-street parking (C01, para 3.95).
RO23	Hull & Humber Chamber of Commerce	√		The Chamber has been consulted throughout the AAP's preparation, has considered the Publication AAP in detail, and considers the proposals would make a positive contribution to Bridlington and the East Riding		The support is welcomed. The AAP places considerable importance on the existing small business community and encouraging growth in the town's small businesses (C01, paras 4.90-4.91, 4.95, 5.10, 5.52, 5.55 and BridTC3,

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				and should be implemented without delay. The importance of supporting existing small businesses is critical, including ensuring there are affordable places for them to locate in the Town Centre.		BridTC13 and BridTC14).
RO24	Hull City Council	No comments	No comments			
RO25	Hull Friends of the Earth (Mr Barry Robinson)		√ (AAP, Appendix 3, Non-technical summary of the SAR; the SAR)	There are errors in the supporting documentation in respect of the volumes and rates of change in the volumes of waste arisings.	Correct the errors and the conclusions reached on the incorrect numbers in the non-technical SAR summary at Appendix 3, and the source in the SAR.	The Council proposes corrections to the figures in the CD01 Appendix 3 in CD18.2, no 77 and to the Proposed Changes to the Sustainability Appraisal Report (CD18.3).
RO26	Hunter, Richard		√ (representor does not state the AAP is 'unsound')	Concerned that: the unit retail scheme is a ten minute walk from existing shops; that existing retailers will uproot and relocate; that the existing shopping area will die; and the retail development proposals will not attract residents to shop more in the town centre;	Not stated; implies a change of policy.	The retail scheme is 310 metres from the top of Chapel Street along an existing shopping street that is part of the primary shopping area designated by the adopted Local Plan the AAP will replace. For many the walk is no more than five minutes, and for many it will be less (around three minutes). CD01 explains that the existing shopping area is non-competitive, for a range of reasons (paras 1.13,

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						<p>4.70-4.71) that must be corrected if competitiveness is to be recovered. While it may that some relocations will occur, these cannot be prevented by the planning system and will generally improve the chances that the retailers will remain in the Town Centre. The AAP puts in place other measures to help the existing traders improve their position: the Harbour Top as part of Burlington Parade (BridTC3) to improve that assets integration with the Town Centre core and bring in more customers; the Strategic Public Realm Framework (BridTC5) with the new Town Square at Bridge Street/Queen Street (to adjoin the Harbour Top) and the landscape schemes to define the Primary Retail Circuit; and the parking (BridTC7) and Access Strategy (BridTC8) to improve the quality of the shopping environment and access to it, including by private car. Evidence from elsewhere suggests people will return to shop in the</p>

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						Town Centre if the offer is appealing and the quality of the shopping environment is competitive with that elsewhere.
RO27	John Bull Confectioners Ltd		v	<p>i. The existing traders will suffer through the provision of additional shopping.</p> <p>ii. Tourism is the town's economic purpose and shifting the balance of the shopping offer to the west will be harmful to the tourism economy. It is mistaken to think tourism should not be the focus simply because the traditional tourism market is changing.</p> <p>iii. Pedestrianisation is harmful to trade. Parking is essential to tourism success.</p> <p>iv. Too little information is provided on how the AAP's proposals will be funded.</p> <p>While happy to support development, the AAP does not address the key problems facing Bridlington.</p>	None suggested, but implied that the AAP should 'go back to basics' and focus on the beach and Marina first, not last; and it should address problems of parking and access.	<p>i. The poor performance of the shopping centre adversely affects the appeal of the Town Centre, and the town, outside the summer season. The existing traders retain just 27% of the catchment's expenditure on comparison goods; the only way of improving the retention is through increasing floorspace and attracting new retailers into the Town Centre. C01 explains at paras 1.13, 4.70-4.71; and the retail evidence is summarised fully in Appendix 1, paras 48-71). The AAP also includes proposals to improve operating conditions for traders, year round, in the existing shopping area: the Harbour Top as part of Burlington Parade (BridTC3), the Strategic Public Realm, including the new Town Square (BridTC4) and the access and</p>

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						<p>movement and parking strategies (BridTC7, BridTC8).</p> <p>ii. The reasons for the decline in the tourism economy have to be taken on board and tackled (Regeneration Strategy, Update 2007, paras 2.30-2.60; C01, Appendix 1, paras 10-13 and paras 40-42). The Spa, Marina and Town Centre improvements are designed to that while creating a more year round visitor market. The seasonality of the tourism offer is a serious problem – overcrowding in the summer, and not enough activity in the winter and is one of the main reasons for the town's economic underperformance, weak labour market (not enough skills) and relatively high levels of deprivation. Bridlington, compared to many seaside towns, has a relatively diverse – but not diverse enough – economic structure (Regeneration Strategy, Update 2007, Table 3.11 and para 3.52</p>

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						<p>explain that Bridlington depends for some 5.7% of its jobs on tourism).</p> <p>iii. The research evidence on pedestrian shows that well-designed schemes advantage traders (which accounts for its prevalence in town centres of Bridlington's size). The Council accepts the importance of good access and parking. C01, through, BridTC7 and BridTC8, is aimed squarely at improving access, reducing congestion and improving parking, all year round.</p> <p>iv. The Council is committed to financing the gap between costs and values in Burlington Parade, recovering the major share of its costs from land disposals together with contributions from the BridTC20 pooled S106 tariff. The Council makes this undertaking in the AAP (C01, paras 5.14-5.16). The Council has set aside the resources, and has been working on, and</p>

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						keeping up to date, the commercially sensitive delivery strategy for Burlington Parade since 2007. The Council Cabinet minute of 21 September 2010 also sets this out (LD14).
RO28	Jones, David	√		Impressed by the scope of the AAP's proposals and particularly impressed with the proposals for the Marina, Gypsy Race and the new Town Square. The plan should allow for a wide range in quality of hotels, conference facilities and restaurants.		The support is welcomed. The AAP does encourage a range of hotels and restaurants, within the evidenced capacity of the economy to support new development for these. The conference market is targeted by the refurbished Spa.
RO29	Jordan, Peter		√	<ul style="list-style-type: none"> <li>i. The Marina is not a reasonable proposal because demand has already been absorbed by other marinas; funding would not be cost-effective; and it will not be viable financially.</li> <li>ii. Housing will not be the affordable housing needed in Bridlington.</li> <li>iii. Although a hotel would meet a need, it would not be lettable for more than 8-10 weeks a year.</li> </ul>	<ul style="list-style-type: none"> <li>i. Provide affordable housing</li> <li>ii. Provide for industrial development</li> <li>iii. Provide a good multi-storey car park and a shopping centre</li> <li>iv. Develop a proper bus-rail-coach interchange</li> <li>v. Encourage an influx of reasonable quality shopping arcades.</li> </ul>	<ul style="list-style-type: none"> <li>i. The demand for the Marina is evidenced (C01, Appendix 1, paras 117-124).</li> <li>ii. The developments will contribute to Bridlington's affordable housing needs, which will be set by the Council's Core Strategy and the evidence for it (C01, paras 102-103).</li> <li>iii. The AAP acknowledges the fragility of the hotel sector (e.g., C01, paras 4.85 and 4.88).</li> <li>iv. Industrial development is not</li> </ul>

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						<p>appropriate in the AAP area.</p> <p>v. A proper bus-rail-coach interchange is proposed (C01, paras 3.13, 3.15iii and BridTC3.2.a)</p> <p>vi. New retail floorspace, in the form of a unit shop scheme, is proposed (e.g., C01, para 3.11 and BridTC3.2.a)</p>
RO30	Local Government Yorkshire & Humber	No comment	No comment	No comments		
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		v (BridTC1, BridTC2)	The strategy and its priorities are cannot be considered deliverable in the absence of a robust and detailed 'Business Plan', most particularly in the current economic climate.	None suggested, other than a review of the strategy to promote instead a high quality scheme that is comprehensive and viable.	The scheme is deliverable; the Council undertakes to cover the gap between costs and values, recovering contributions to its costs from the disposal of development sites (with the market failures and other deterrents to investment removed), and from the BridTC20 S106 pooled tariff for the Strategic Public Realm costs (C01, paras 5.14-5.16, and 5.82-5.86). Cabinet Report and Minute of 21 September 2010 sets out the Council's commitment and the up to date financial position (LD14).

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						CD18.2, no 74, pg 25 explains that it is not appropriate to publish commercially sensitive information on the details of costs and values within Burlington Parade. The evidence base has been kept up to date in respect of the drivers of demand, and takes into account the effect of the recession and slow return to growth (CD01, Appendix 1, paras 3-95).
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		v (BridTC3, BridTC8)	<p>i. The Lords are concerned that the proposals for the Beck Hill car park will merely replace existing parking numbers, and therefore the proposals will constrain inward investment.</p> <p>ii. The proposals for the Beck Hill car park are prejudicial to the interests of the Lords' tenants and the value of the Lords' property interests in the AAP, and therefore harmful to the Lords' charitable purposes.</p> <p>iii. The questions over the deliverability of the proposals will cause significant blight.</p> <p>Therefore the Lords object to</p>	None suggested.	<p>i. The proposals increase the parking numbers. The Council has been attempting to work with the Lords to agree a car park scheme that achieves the Lords' objectives for a still larger number of parking spaces (meeting the interests of their tenants) but does not compromise the proposals for the Beck Hill realignment, for Gypsy Race, for good quality design (particularly within the Bridlington Quay Conservation Area ) and for removing the adverse effects on the area of the poorly kempt back</p>

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				Burlington Parade.		<p>elevations and under-used land at the rear of Manor Street. The Council is hopeful that it will still achieve this. The Statement of Consultation (Reg 25), CD21 provides details on the consultation that has taken place and is ongoing with the Lords.</p> <p>ii. The AAP is concerned to improve parking to serve the whole of the Town Centre, and without prejudice to the Lords' premises and the tenants of them.</p> <p>iii. The Council is confident that Burlington Parade is deliverable. The proposals are supported by a robust and up to date evidence base, and have the benefit of a considerable level of feasibility work covering each aspect of the proposals. This work is necessarily commercially privileged; if it were not, it would compromise the Council's ability to secure the private sector risk investment</p>

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						the proposals require.
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		v (BridTC7)	<p>i. The Lords are concerned that the traffic management measures will adversely affect the viability of existing businesses in the AAP area by, amongst other things, restricting access to the rear of their Manor Street properties and limiting access from the north side of the town and through Queen Street and Bridge Street to the south. The Town Square should be in Prince Street instead, so that these streets remain open.</p> <p>ii. The proposals to manage the pricing of car parking will be harmful to the Lords' tenants; the Lords operate in a free market, and the Council's pricing policy will create a monopoly interest.</p> <p>iii. The AAP approach is too inflexible, and therefore will discourage rather than encourage inward investment.</p>	None suggested, but implied that the AAP should retain existing access arrangements; make a new Town Square at Prince Street / Garrison Street.	<p>i. The evidence base shows that the incursion of significant traffic and the on-street parking provision through all but King Street in the existing shopping area is one of the key factors militating against the competitiveness of the shopping centre, particularly in the core area of the centre. C01 explains at 1.13-1.17; Appendix 1, para 61; and the evidence on the very poor retention levels of the shopping centre under the current arrangements that the Lords wish to retain (27% of comparison spending as explained in C01, Appendix 1, para 56). Improving the quality of the shopping environment is critical to the operating efficiency of existing traders. Improving car parking provision elsewhere is also critical and the AAP proposes this to support all businesses in the Town Centre (C01, para 3.98-3.100).</p>

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				<p>iv. The policy will deliver a drastic transport strategy that will not address the needs of existing residents and businesses.</p>		<p>The Town Square is proposed for Bridge Street Queen Street both to benefit the year round business of the Town Centre and to help bind and integrate Burlington Parade and the Harbour Top to the existing Town Centre core. Prince Street would prevent the critical improvements required in the pedestrian environment in the Town Centre (CD12, First Preferred Options Strategy, Appendix 7, para 17)</p> <p>ii. The Council is justified in using S106 provisions (C01, para 3.103) both to discourage long stay parking in conformity with RSS Policy T2 (RD01), as well as to control the risks of localised traffic problems caused by differential car park pricing.</p> <p>iii. The AAP proposes a specific strategy, having selected the reasonable options most likely to be optimal in achieving agreed objectives for securing the regeneration of the AAP area. Flexibility that offers</p>

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						<p>alternative routes would undermine this strategy. The AAP (C01, paras 6.17-6.19) contains milestones that, if not met, would trigger the actions set out in C01, para 6.14. The approach was considered reasonable by the senior inspector who provided front-loading advice (CD09).</p> <p>iv. The Council considers a dramatic change to be reasonable. Continuing with the current arrangements would be to retain the very circumstances that are contributing to the decline of the Town Centre.</p>
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		√ (BridTC9)	The Lords object on grounds that the sequential sites are undeliverable.	None suggested, but implied the policy should be removed.	CD18.2, nos 26 on pg 10 and 59 on pg 21, set out the Council's proposals to amend the AAP to make clear that the sequential approach requires the preferred sites to be suitable, available and viable for the use proposed.
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton)		√ (BridTC10)	The Lords object on grounds that the policy begins with a 'negative stance' ; imposes onerous conditions on developers to demonstrate that not just their	None suggested, but implied the policy should be removed.	The representation is not accurate as to the requirements of BridTC10. The only requirement is to show that the proposal will not diminish the investment required

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	Wilmore)			proposal is is not permissive as 'required' by PPS4; and is inflexible.		to deliver the Strategy's proposals to the extent that their delivery would be put at risk – and admits of the possibility even in this case that there could be benefits that outweigh this risk. The policy is a means of introducing flexibility, not increase it (i.e., allowing proposals not foreseen by the AAP).
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		v (BridTC11.1 and BridTC11.8)	The Lords object that the provisions, in relating to all developments, is onerous.	None suggested. But implied that the provisions should either be removed or apply to major development only.	The Council considers the policy to be merited and notes that it is welcomed by Natural England, Environment Agency and English Heritage (who only ask for further strengthening). One of the greatest disservices to Bridlington's prosperity over the last two or so decades of its decline has been poor quality development; one of the greatest aims going forward is to improve that quality (working with developers using 'development management' approaches to do so) and to meet the Council's obligations for the highest achievable standards environmentally. CD01, BridTC8

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						lists the considerations that determine whether the other parts of the policy are met.
RO31	Lords Feoffees and Assistants of the Manor of Bridlington (Barton Wilmore)		√ (BridTC12)	The Lords consider the requirement for Development Statements to be onerous, and that pre-application discussions are adequate.	None suggested. Implied the policy should be removed.	The Council maintains the usefulness of this approach for major schemes (which are very rare in Bridlington); and the AAP (CD01, para 4.66) states that the Council will be proportionate in implementing this requirement.
RO32	Masters, Peter		√ (observation on shopping)	Fears the shopping proposals will leave the existing shopping area a ghost site; that the Gypsy Race is only one of the improvements needed as the town is a mess; and the Spa is a waste of money.	None suggested.	The Council considers the evidence firmly to justify the shopping proposals (CD01, Appendix 1, paras 48-71, summarises). The Spa has been very successful in attracting new visitors from a wider market spectrum to Bridlington and over a longer part of the year, increasing expenditure in the town and helping to support more jobs than would otherwise have exist.
RO33	Ministry of Defence	No comment	No comments	The Ministry of Defence has no safeguarding concerns in the AAP area or in Bridlington.		
RO34	Morrell, Terry		√	The AAP should split its concerns between residents and their needs, and the tourist trade.	None suggested.	The Council contends that the AAP does make a careful distinction between interests of residents

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				<p>Attractions are needed to attract year round trade.</p> <p>Pedestrianisation is needed to attract new interests from retailers. More effort is needed to encourage businesses to improve the appearance of their premises. Consideration should have been given to attract a hotel as part of the Spa refurbishment, as bed and breakfast and distant park and ride facilities will not appeal to the Spa's customers. Although the plans have credence on the face of it, the new designs are grey and shelter from inclement weather is still not forthcoming. The AAP should recognise the low skill levels and poor education attainment averages, Bridlington's peripheral local location and the fact that it is not a manufacturing or an industrial area. The Marina will not achieve a step change, and the Council and its consultants are blinded to other options and do not accept other ideas.</p>		<p>versus those of the visitors, but aims to use measures to satisfy the former (like improve the shopping offer and the appeal of the Town Centre for residents) as a key means of encouraging a more diverse visitor market over more o the year.</p> <p>The AAP includes a Supplementary Planning Document (CD07) that provides design guidance for the whole of the AAP area; and the AAP (CDO1, e.g., BridTC11) sets out exacting design standards to be achieved by new developments.</p> <p>The hotel will have to be delivered by the private market – and has always been planned in. The AAP focuses on creating the conditions that will make it possible to attract the needed investment in this very difficult market for Bridlington. CD01, BridTC3 designates a site next to the hotel; BridTC9 puts in place a sequential approach that promotes the designated sites and the Seafront; and the protection of the B&amp;B and guest house zones in</p>

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						<p>the adopted local plan are removed in recognition of the drag on the market of this provision (CD01, para 1.25). CD01, BridTC7 and BridTC8 propose to remove traffic and parking from the established shopping areas of the Town Centre.</p> <p>The AAP process considered other alternatives for transforming Bridlington, but none – on the evidence – performed as well as the options promoted (CD10, Appendix 7). The AAP's strategy is justified on a wide-ranging, up to date and robust evidence base (CD01 summarises this at Appendix 1).</p>
<b>RO35</b>	<b>National Grid</b>	No specific representation	No specific representation	The National Grid owns a site outside the AAP area that it considers appropriate for housing; if the AAP prevents housing on sites such as the National Grid's site, the National Grid would object.		The AAP deals solely with allocations in the AAP area, and does not seek to prevent housing on other sites outside the AAP area.
<b>RO36</b>	<b>Natural England</b>	√		Natural England welcomes the AAP, but has some minor comments:		The Council welcomes Natural England's support, and proposes the minor changes to the AAP

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				<ul style="list-style-type: none"> <li>- A map of the designated SPA and SAC is needed</li> <li>- The references to the replacement of the 1994 Habitat Regulations needs to be updated to 2010.</li> <li>- The AAP needs to make clear that the Marina's acceptability is contingent on avoiding harm to the designated SPA and SACs.</li> <li>- The AAP would be improved if all development were required to contribute to Green Infrastructure.</li> <li>- BridTC4 needs to acknowledge that all habitat value needs to be understood so appropriate mitigation can be put in place if necessary.</li> <li>- BridTC5, BridTC7, BridTC11 are welcomed, but further emphasis is needed on sustainability issues (e.g., SUDS, alternatives to the private car, management of</li> </ul>		suggested by Natural England (CD18.2, nos 46 and 47, pg 17).

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				climate change).		
RO37	Pickering, Cllr Geoff			<ul style="list-style-type: none"> <li>i. The plan is influenced by RSS rather than local concerns.</li> <li>ii. Affected residents have not been consulted.</li> <li>iii. Cllr Pickering's views have been ignored.</li> <li>iv. Council officers have 'led', rather than 'listened' to consultees.</li> <li>v. The consultation has been on process, not detailed plans, and these are aspirational rather than realistic.</li> <li>vi. Views are lost from Pembroke Gardens and this has not been made clear.</li> <li>vii. Plans are over-reliant on supermarket shopping, and this approach has been refuted by CABE amongst other publications and studies.</li> <li>viii. The shopping proposals do not take account of the crash of consumer confidence with the recession and cuts, the retail proposals in Beverley.</li> <li>ix. The retail proposals are 'out</li> </ul>		<p>The Council wrote Councillor Pickering a full response to his representation, and this is provided in CD20.3.</p> <ul style="list-style-type: none"> <li>i. RSS forms part of the development plan, but the AAP also reflects local views (CD21).</li> <li>ii., iii, iv. CD21 sets out the consultations undertaken; and CD13, CD11 and CD08 set out the details of the Council's responses to consultation at each stage; CD14, Appendix 1 reports on the consultations up to the Issues and Options stage; CD12, Appendix and CD10, Appendix 7 the options selections that were made.</li> <li>v. The proposals are realistic, based on the evidence (CD01, Appendix 1) and the tactics for delivery (CD01, Section 5). Detailed proposals will be consulted on at planning application stage in line with CD01, BridTC12.</li> <li>vi. Some views will be lost, but</li> </ul>

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				<p>of town' and will harm the existing shopping area, including by encouraging key anchors to relocate.</p> <p>x. The changes will severely damage the character of the Town Centre.</p> <p>xi. Quay Road , the connecting street between the existing shopping area and the proposed out of town shops is not a shopping street, and the separation is further increased by the proposals for offices and housing in the area between the two.</p> <p>xii. The Gypsy Race proposals are faulty because the level changes and water retention challenges make the proposals unviable. Nor is the Gypsy Race proposal essential for economic regeneration.</p> <p>xiii. There is no need to demolish Bridge Street to establish the Gypsy Race link to the Harbour.</p> <p>xiv. The principles of the plan are</p>		<p>the benefits of the Harbour Top redevelopment are substantial, and new locations (e.g., Spa Gardens) have added to the quiet places for viewing the sea.</p> <p>vii. CABE advised on inserting supermarkets into town centres without adverse effects on townscape. The plans require Tesco's relocation; it is a means to an end that produces substantial benefits for the Town Centre's regeneration and for the store operator who will create further jobs in the town.</p> <p>viii. SD08 and SD09 update the retail capacity figures (2010) to take account of the recession.</p> <p>ix, xi. The unit shop site is 310 metres (3-5 minute walk) from the heart of the existing shopping area, and linked to it along an existing shopping street that is part of the defined primary frontage in the adopted Local Plan.</p>

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				<p>not the basis of the objection, rather the suspect consultation process the flawed and out of date justification for the proposals and the potential for serious damage to the economy of the town. ,</p>		<p>ix. The AAP includes policy provisions to protect the Town Centre's character (e.g. C01 BridTC3.8, BridTC4, BridTC11); the SPD (CD06) provides a great deal of design guidance focused on protecting and enhancing the Town Centre's character; and CD18.2 (nos 40, 51) propose minor changes to the AAP that will strengthen the provisions further.</p> <p>xii. The Gypsy Race plays a key regeneration role in driving values, unifying the comprehensive development site and making feasible a scale and quality of much-needed regeneration than would otherwise be feasible. The Environment Agency agrees with the Council that the works needed for its management are feasible.</p> <p>xiii. The proposal enables the Gypsy Race spine to fulfil its purposes.</p> <p>xiv. The Council notes the</p>

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						concern, but feels it is unjustified as explained in CD21.
<b>RO38</b>	<b>Royal Society for the Protection of Birds</b>		√ (BridTC4)	The AAP does not comply with the requirements of the Habitat Regulations, because it promotes the Marina regardless of the results of the Level 1 Screening Assessment's finding that the construction and operation of the Marina would have likely significant effects on the Flamborough SAC and in the absence of having carried out a full Appropriate Assessment.	The full Appropriate Assessment is required under the Conservation of Habitats and Species Regulations 2010 before the AAP can be adopted by the Council.	The Council has continued to work with the RSPB (with the support of Natural England) to allay these concerns; SD01 and the initial Stage 2 Appropriate Assessment, set out the record of this continued work. The Council proposes to strengthen further the AAP's statement (C01, BridTC4) that the Marina will not be permitted if harm to the designated area cannot be avoided (CD18.2, no 46, pg 17). The Council also considers that enough information has been gathered to find, and Natural England concur, that the Marina can be designed, constructed and operated so as to avoid harm to the designated area. The Council was advised by a senior inspector in a front-loading visit to assist the preparation of the Publication that this approach is correct. The full Appropriate Assessment can be completed when the design work

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						is being done in preparation for the planning application.
RO39	Sykes, Gordon		v (Para 1.36)	The statement is incorrect that there is no traffic congestion out of season.	Make provisions for removing most traffic lights and increasing on street parking.	The Council points out that the statement says that the Town Centre does not suffer <i>unduly</i> from traffic congestion; some of the same causes of congestion during the summer season persist all year round (e.g., on-street parking in the shopping core). The evidence shows that increasing on-street parking would increase congestion; and that the removal of most traffic lights would have a very harmful effect on safety, particularly for pedestrians but also motorists.
RO39	Sykes, Gordon		v (Para 1.37)	The statement is incorrect; traffic congestion is not compounded by on-street parking; and the driver should be catered for more, not less.	Make provision to increase on street parking.	The evidence shows the contrary.
RO39	Sykes, Gordon		v (Para 3.84)	The proposals to upgrade Beck Hill and downgrade traffic in the core of the established shopping area will not work.	Remove proposals from the AAP to close any streets.	The evidence shows that the incursion of traffic in the heart of the Town Centre's shopping area has a significant adverse effect on the quality of the shopping environment and has contributed to the decline of the centre's

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						competitiveness.
RO39	Sykes, Gordon		v (Para 5.91)	The Council cannot manage projects effectively, and therefore the AAP is wrong to propose that Council manage the delivery of the AAP's proposals.	Charge other bodies than the Council with delivery responsibilities.	The Council's record of delivery is strong. CO1, paras 38-39 set out successes that have merited national awards.
RO40	<b>Tesco Stores Ltd</b>		v	<ul style="list-style-type: none"> <li>i. The AAP is not legally compliant because it precedes the Core Strategy, determines the strategy for Bridlington and creates risks that the AAP will not be in conformity.</li> <li>ii. The Council is incorrect to assume that the Coach Park site will be a feasible option for a Tesco store; the site is dependent on land acquisitions from Network Rail ; and the site will require that the store operate with a substantial shortfall in parking numbers.</li> <li>iii. The new store would be in an inferior location to the present store.</li> <li>iv. The plan is inflexible in not allowing for alternative approaches to achieving the AAP's clearly stated objectives. Although the objectives are</li> </ul>		<ul style="list-style-type: none"> <li>i. The strategic basis for the AAP is provided both by RSS policy YH5 (RD01) and PPS4 which directs to the Town Centre most town centre uses. The AAP has also been prepared to the timetable in the approved LDS. There is little risk that the AAP will not conform to the Core Strategy; and major areas of policy rely on the Core Strategy (e.g. affordable housing).</li> <li>ii. The assumptions on the Coach Park site's suitability rest both on the known Tesco formats and work with Tesco itself since 2006.</li> <li>iii. The present store is located on the optimal site for unit shopping. The development of the unit shop scheme on the site of the existing Tesco store</li> </ul>

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				<p>acceptable the approach to interpreting them is too inflexible.</p> <p>v. The inflexibility is problematic; it requires a high risk CPO; it is aggressive towards Tesco.</p> <p>vi. The Council did not consider the alternative of the redevelopment by Tesco of its own site for 'an appropriate town centre use'.</p>		<p>and the extension of the primary shopping area to include the unit shop scheme, the redeveloped Tesco store will be in exactly the same position in respect of the defined primary shopping area as it is under the adopted Local Plan.</p> <p>iv. The AAP promotes a specific strategy, drawing on the evidence, consultation throughout its preparation and the findings of the Sustainability Appraisal. The strategy promotes the options that have performed best in meeting the strategy's objectives. The AAP (C01) contains two principal mechanisms for introducing flexibility should it not prove possible, despite the evidence, to deliver the optimal option(s): milestones in the monitoring programme that, if not met, will trigger one or other of the responses set out in C01, para 6.14 (an approach considered</p>

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						<p>appropriate by the senior inspector who provided the Council with front-loading advice – CD09); and BridTC10, which allows for alternative options to the AAP's priorities, subject to a balance of benefits over costs in respect of any adverse impact on the delivery of the priority projects.</p> <p>v. PPS12, para 2.7 states that spatial plans can justify the use of CPO powers where needed to enable regeneration, and para 5.5 states that AAPs can provide the basis for CPO action. The AAP aims to reduce very substantially a risk of failure should a CPO be needed as a last resort. The evidence base, consultation process and the approach to policy for Burlington Parade all take into account the SoS's considerations when determining a CPO; and the Council has put in place an active programme of forward acquisitions by agreement that</p>

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						<p>has made considerable progress. C01, para 5.30 explains the AAP's approach to meeting the criteria set by Circular 06/04, and C01, para 5.33 indicates the progress made towards the assembly of the site.</p> <p>The Council initiated discussions with Tesco at Issues and Options stage and these have continued since. From the outset, Tesco has indicated its willingness to redevelop on the Coach Park site, subject to agreeing a satisfactory layout of the site and terms.</p> <p>Negotiations are proceeding constructively.</p> <p>vi. The Council, as part of the feasibility work, did examine what scope might exist for Tesco to redevelop its own site for comparison goods trading in line with the Town Centre's needs. The work suggested this would be very unlikely; not only would Tesco not wish to lose trade during a construction</p>

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						phase, but the site is too small and not well configured to accommodate any substantial level of comparison trading, a standard Tesco format and parking – and still achieve an acceptable design given the proximity to the listed railway station. In contrast, the Coach Park site redevelopment permits Tesco to continue trading in its existing store until the replacement is ready to open.
RO40	Tesco Stores Ltd		√ (BridTC3)	The policy is too prescriptive and should not contain floorspace thresholds	Instead, simply prepare a Brief for the development of the site in conjunction with key stakeholders	The AAP promotes a specific strategy; but contains milestones (C01, para 6.17) that if not met would trigger one or other the actions in C01, para 6.14. The senior inspector who provided the Council with front-loading advice considered the approach to be reasonable (CD09).
RO40	Tesco Stores Ltd		√ (BridTC7)	The policy is too prescriptive and there is no evidence or testing, and would restrict the servicing of the existing Tesco store.	None suggested.	The Council continues to work with Tesco on the layout and arrangement of the store, and are close to agreeing a solution that meets Tesco's efficiency and operating requirements as well as

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						the AAP's objectives for Burlington Parade. There has been a great deal of testing; the layout work has been through several iterations both by Tesco's architects and by the Council's.
RO40	Tesco Stores Ltd		v (BridTC8)	The proposal to require the supermarket parking to be short stay and public is unduly restrictive. The 700 spaces is unrealistic and contrary to PPG13 standards.	None suggested. Implied the number should be reduced.	The 'up to' 700 spaces (C01, para 3.15.i) ) was a response to Tesco's then stated requirement. The Council was content to support this number and the transport assessment work suggests the number could be accommodated. The Council's preference is for a much smaller number; and points out that the RSS (RD01, Table 15.3) maximum is 1 space to 14-25 sq m gross for a food store, and 'considerably' lower in a town centre. At 1 space per 25 sq m, an 8,200 sq m gross format would produce a maximum of 328 spaces. The Council is justified in using S106 obligations to control the use of public parking in the town centre: to ensure parking numbers do not militate against the objective of encouraging

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						alternative modes of travel into the Town Centre; to discourage long-stay public parking in the Town Centre in conformity with RSS (RD01, policy T2); and to avoid localised traffic problems.
RO40	Tesco Stores Ltd		v (BridTC10)	The policy is unduly prescriptive in relation to the Tesco store site and the Coach Park site but is less so elsewhere; and is contrary to PPS4 that requires no demonstration of need within a town centre.	None suggested. Implied BridTC10 should be removed.	BridTC10 aims to protect the delivery of a specific strategy. The AAP, in line with PPS4 EC1.3b and EC1.4 assesses capacity. In line with para 7.18 of the PPS4 practice guidance, the AAP promotes and protects a specific strategy for accommodating this capacity.
RO41	Veitch		v	<ul style="list-style-type: none"> <li>i. The Gypsy Race should run in a pipe to avoid dry periods and to provide a rubbish and maintenance-free solution.</li> <li>ii. The station frontage should be left as it is.</li> <li>iii. Vehicles should run on tarmac surface rather than paving.</li> </ul>		<ul style="list-style-type: none"> <li>i. The Gypsy Race proposals play a critical role in the deliverability of the Burlington Parade scheme (C01, para 1.44, first bullet, with clarification proposed by CD07, no 50; C01, para 2.28 iv, para 3.58 and 3.59). There is no alternative option that so efficiently satisfies these important purposes.</li> <li>ii. The railway station is a listed building and the AAP contains no proposals to alter it. Instead, the proposals aim substantially,</li> </ul>

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						with the development of the Station Plaza and the delivery of a well designed unit shop scheme and redeveloped supermarket, to improve the setting of the listed building (CD01, BridTC3, BridTC5; CD06, paras 6.6-6.11 and Figure 6.2, set out the design guidance). iii. The Council notes the view.
RO42	<b>West Street &amp; Surrounding Area Regeneration Group (WSARG)</b>		v	<p>The 400 members are concerned that the Council's officers ignore their views. A few of the AAP's shortcomings are:</p> <ul style="list-style-type: none"> <li>i. The AAP's unit shopping site is half a mile to the west of the town centre.</li> <li>ii. The Coach Park is removed without an alternative.</li> <li>iii. There is no provision for a bus station near to the railway station.</li> <li>iv. The proposed shopping development [sic] on the Harbour Top will obliterate the views the popular South Cliff Gardens enjoy.</li> <li>v. There is no indication of the future for Leisure World.</li> </ul>		<p>The Council has attended WSARG meetings, and no more than 15 have been present at any one time. The Council has exceeded (CD21 explains) the consultation obligations agreed with government for the preparation of its development plan documents (CD15).</p> <ul style="list-style-type: none"> <li>i. The AAP's unit shopping scheme site is 310 metres (0.2 miles / less than a quarter of a mile) from the mid-point of the eastern end of the site at Quay Road to the top of Chapel Street/Manor Street – along Quay Road/Prospect Street/Manor Street which itself is a shopping street that is</li> </ul>

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				<ul style="list-style-type: none"> <li>vi. There are few proposals that would actually regenerate the Town Centre.</li> <li>vii. All the parking is short-term, whereas the aim must be to encourage people to stay in the town longer.</li> <li>viii. Shopping areas should have covered walkways.</li> </ul>		<p>within the 'primary retail frontage' designated by the adopted Local Plan.</p> <ul style="list-style-type: none"> <li>ii. There are alternatives in and on the edge of the Town Centre, and the Park and Ride site. The Council will not take any action that compromises coach services to Bridlington.</li> <li>iii. The AAP proposes a bus-coach-rail interchange (C01, para 3.13, 3.15.iii and BridTC3.2.a).</li> <li>iv. The Harbour Top proposal is not for a shopping scheme, but for a mix of retail, leisure, hotel and housing uses. CD06, paras 7.36-7.37 provides design guidance that explains that the roofline and building heights are to be varied on the Harbour Top's buildings, and not to exceed five stories above South Cliff Road (CD07, proposed minor change no 63 clarifies the design guidance in CD06). While there will be some loss of views from the gardens, the Harbour Top development is a critical catalyst to Burlington</li> </ul>

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						<p>Parade, and produces substantial regeneration benefits for the regeneration of the Harbour and to the established core of the shopping centre. The £6.7m Spa Gardens provide an alternative quiet place close by to rest and view the sea, as do Crescent Gardens to the immediate north of the shopping area.</p> <p>v. The AAP explains (CD01, paras 3.77-3.78) that the Council will consult on the options for Leisure World once these are clear. BridTC6 provides for a full range of possibilities.</p> <p>vi. The AAP is wholly aimed at regenerating the Town Centre, where the vast bulk of the investment will need to come from the private sector – investors and developers, businesses, householders, individuals and tourists – all of whom need to be induced to choose the Town Centre over other alternatives for their</p>

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		Sound	Unsound			
						<p>money. The AAP has to work with the grain of the market, and remove the deterrents to its more efficient function. CD01 explains in the Executive Summary at para 26, and in the body of the AAP at paras 5.9, 5.13 and 5.19. Evidence of successful regeneration elsewhere shows that correcting the causes of underperformance is the first necessity in reversing the decline of a place.</p> <p>vii. The town suffers significant congestion, particularly during the four months of the holiday season. Controlling long stay parking is one of the tactics in the armoury; car park pricing and the Park and Ride are key mechanisms.</p>
RO43	Western, Anthony		v (para 5.4)	The developments are not 'top quality' as evidenced by the photographic record provided with the representation. The Council officers do not take on board comments at planning stage, and are impervious to	None suggested.	The Council notes the comments and regrets them. The Council also notes that the winning design for Spa Gardens (the subject of the photographs) was chosen following a public consultation exercise in which views were

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		Sound	Unsound			
				adjusting plans in response to inputs from the public.		solicited and taken into account. The architect of the scheme was retained throughout. The scheme also won a £3m award from the national Sea Change scheme (CD01, Executive Summary, para 38).
<b>RO44</b>	<b>Wheeler, Michael and Sandra</b>		√	The morphology of the town places the Marina and existing shopping area at the compass point, and therefore the Marina should be the only start point for redevelopment. To put so much emphasis on the retail scheme at the railway station is wrong, and the proposed Plaza will quickly deteriorate. Private enterprise should drive development, not Councils.	None suggested.	The Council agrees fully with the view of the Town's morphology and the critical position of the Harbour and Marina as a focus for development. The AAP promotes both – including the regeneration of the Harbour Top and its integration with the Town Centre core – and puts them at the heart of the regeneration strategy (CD01, BridTC3 and BridTC4). The site to the south of the station proved optimal, all matters considered, to secure the much-needed additions to the Town Centre's retail offer (CD12, Appendix 2; CD10, Appendix 7). The AAP is focused heavily on harnessing private enterprise – including removing the deterrents to investment that help to explain the town's decline and building up

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						the small business sector. CD01 explains the former in the Executive Summary at para 26, and in the body of the AAP at paras 5.9, 5.13 and 5.19. CD01 puts forward the objectives (Executive summary, para 35, paras 1.8,1.18, 1.29, 2.12 and Strategic Objective 1, para 2.28 and Enabling Objective v) and measures to support the development and growth of the small business sector at paras 2.30 3.10.ii), 3.11 sixth bullet, 3.15.i), BridTC3.2.a and BridTC3.2.e, and paras 5.49 and 5.52.
<b>RO45</b>	<b>Yorkshire Forward</b>	√		Welcomes the contribution the AAP will make towards supporting the renaissance of the town and ensuring it makes the most of assets such as the marina and the Burlington Parade area.		The support is welcomed.