

**Publication Bridlington Town Centre Area Action Plan (October 2010):
Statement of Representations, Regulation 30(1)(e)
Part 3: Further Correspondence, Post-representation, with Bridlington Town Council (RO5),
Councillor Pickering (RO37) and West Street and Area Residents Group (RO42)**

The Council's further correspondence in response to the representations submitted by the Town Council, Councillor Pickering and the West Street and Areas Residents Group (WSARG) is attached. The Council's aim was to reassure the respondents on matters in the AAP that had not been understood and on matters of fact. The Council also offered to meet the Town Council and WSARG, but neither felt a further meeting would be useful. Both asked that their original representations remain as drafted and that their further correspondence be submitted with the AAP.

"paula"
<paula@bridlington.gov.uk>

20/01/2011 09:55

To <John.Lister@eastriding.gov.uk>
cc <cllr.m.charlesworth@bridlington.gov.uk>, <cllr.s.finlay@bridlington.gov.uk>
bcc

Subject RE: Bridlington Area Action Plan

Morning Mr Lister

Following the full council meeting last night the Council discussed your email about addressing the Council and the following was dictated and approved:

"The Council has considered your request for a meeting on the above, following last night's Full Council meeting on Wednesday 19th January 2011. There has been every opportunity for a verbal response to the Council's concerns of the Draft AAP over the past twenty seven months. The written response, issued with the final AAP in October 2010, rejected all points raised by the Council together with all points raised by the other 40 odd parties submissions. Under the above circumstances the Council can see no useful reason for your requested meeting. You will be able to make your case to a much wider audience at the Public Inquiry. Kindly include this exchange of emails with the Council's submission on the AAP for the Inspector's attention".

Regards

Paula
Mrs Paula King
Interim Town Clerk & Civic Office
Bridlington Town Council

Bridlington Town Council, 62 Quay Road, Bridlington, YO16 4HX, Tel: (01262) 409006, paula@bridlington.gov.uk, www.bridlington.gov.uk

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From: John.Lister@eastriding.gov.uk [mailto:John.Lister@eastriding.gov.uk]
Sent: 18 January 2011 10:41
To: paula@bridlington.gov.uk
Subject: RE: Bridlington Area Action Plan

Paula
Yes they would. We have to submit to the Inspector by mid Feb and any amended representations would be included.

John Lister
Head of Bridlington Renaissance
Town Hall
Bridlington
Tel 01482395040

"paula"
<paula@bridlington.gov.uk>

To<John.Lister@eastriding.gov.uk>

cc

18/01/2011 10:21

SubjectRE: Bridlington Area Action Plan

Dear Mr Lister

For clarification purposes only, if a meeting was arranged where you were to discuss/explain aspects of the AAP, would the Council have the opportunity to be able to amend their AAP response considering that the deadline of Monday 10th January 2011 has passed?

Thanks

Paula
Mrs Paula King
Interim Town Clerk & Civic Office
Bridlington Town Council

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From: John.Lister@eastriding.gov.uk [<mailto:John.Lister@eastriding.gov.uk>]

Sent: 17 January 2011 17:18

To: paula@bridlington.gov.uk

Subject: Bridlington Area Action Plan

Paula

I had a brief discussion last week with your Councillor Shelagh Finlay regarding the Town Council submission in respect of the Bridlington Area Action Plan.

I would like to try and get an opportunity to talk to the Town Council, either on my own or with Alan Menzies, to explain a little more of the reasoning behind the plan, the economics and the delivery mechanism. I think then your councillors will see that some of their suggestions such as the Fun Fair, town parking and Prince St. are not precluded by the plan but others such as Leisure World and Yorkshire Water are not within the scope of a planning document.

We could also give you some assurance on the progress of developments with major partners and close off a number of the rumours that seem to be the basis of the councils

objections /comments.

We are prepared to have the meeting either as part of your normal council agenda or as a more personal and largely off the record meeting.

Can you please let me know if your councillors are interested in such a meeting and, if so, could you please offer some dates (evenings are also possible as far as I am concerned)

John Lister
Head of Bridlington Renaissance
Town Hall
Bridlington
Tel 01482395040



EAST RIDING

OF YORKSHIRE COUNCIL

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Alan Menzies Director of Planning and Economic Regeneration

Mrs Paula King
Bridlington Town Council
62 Quay Road
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YO16 4HX

Your Ref:
Our Ref:
Enquiries to: John Lister
E-Mail: john.lister@eastriding.gov.uk
Telephone: 01482 395040
Date: 16 February 2011

Dear Sirs,

Bridlington Town Centre Area Action Plan – Submission Document

East Riding Council is, of course, concerned to read the Town Council's representation on the Publication Document Area Action Plan and to receive the subsequent email stating that the Town Council cannot see any merit in the Council's offer of further discussion. We thank the Town Council for taking the time to make the representation, but of course regret that it finds the AAP neither to be justified nor effective.

I am writing on behalf of East Riding Council to respond to the points raised by the Town Council in its representation. The Council hopes very much that this short paper – focused on the Town Council's particular concerns – will reassure the Town Council on a number of its points and will help the Town Council to understand better why, on the evidence, the AAP promotes the options it does. The Council also hopes that, having read this paper, the Town Council may be in a position to reconsider at least some of its comments.

Meanwhile, the Council wishes to express its thanks to the Town Council for its involvement in the AAP. It is a matter of fact that the Town Council – notwithstanding the comments made in its representations – has played a significant part in shaping the AAP, not least the AAP's focus on making Bridlington town centre more competitive, all year round, for its residents rather than a focus on its tourism economy. The Town Council is also a signatory to the Town Charter. The Town Charter laid the foundation for the AAP; and the AAP now provides the policy basis for delivering many of the Charter's proposals (where the subsequent work to prepare the AAP could both justify these proposals as the preferred options compared to alternatives and demonstrate their deliverability).

The Council again extends its offer to meet with the Town Council as a group, at its convenience, to go over the points made in the representation, those the Council makes in response here and anything else the Town Council wishes to discuss.

This note sets out the Council's response to the Town Council's concerns in four parts, as follows:

- Part One: Sets out an explanation of the Council's obligation to justify the proposals in a development plan document on the evidence and on their deliverability (the AAP is a development plan document).
- Part Two: Provides a précis of the evidence that relates to the Town Council's particular concerns in respect of retail development, parking and housing, and, refers the Town Council to the parts of the AAP where the evidence is summarised in full.
- Part Three: Summarises the ways in which the Council has responded positively to the Town Council's comments on the first and second preferred options draft of the AAP, together with the reasons, based on the evidence, why some of the Town Council's comments could not be acceded to.
- Part Four: Sets out a response to the points the Town Council makes in the representation on the soundness of the Publication Document AAP.



Nigel Pearson Solicitor Chief Executive



PART ONE - The Council's obligations in respect of proposals that are justified on the evidence for them and their deliverability

The Council can show that it has been diligent in seeking, and taking into account, the Town Council's views on the AAP's issues and proposals at each stage of its preparation – beginning with the work to prepare the Town Charter. The Town Council is also represented on the Core Steering Group of the Bridlington Renaissance Partnership (BRP), the Town Improvement Forum (TIF) and has an open invitation to take part in the Town Team. Minutes of the BRP and TIF meetings are available to all Town Council members. Each of these groups has had considerable input into the AAP over the whole period of its preparation. The Town Council also made formal representations on the developing plan at the first and second preferred options stages, and again at Publication Document stage. This note considers the Town Council's comments on all of these. Part Three of this note deals with the two preferred options stages (2007 and 2009) and Part Four with the 2010 Publication Document AAP.

East Riding Council is required to produce, in preparing each of its development plan documents, a plan which justifies its proposals on the evidence (as the best of the alternative, deliverable, options) *and* which is also 'effective' (i.e., the proposals promoted by the plan should be capable of delivery and lead to the outcomes the plan seeks). The evidence the Council is obliged to prepare includes involving local communities to establish 'what local people want' as well more objective evidence (facts, research findings, best practice etc). The Council's task is to balance the sometimes competing positions where the evidence and views expressed through consultation differ. Overall, the Council is obliged to ensure the AAP promotes the options that have the greatest likelihood, both on the evidence and in respect of the various views expressed, of achieving the agreed objectives in Bridlington for a much more competitive, easy to use, distinctive and attractive town centre and environs.

The Town Council will also understand that the public sector's resources are scarce. The Council, therefore, where it has to invest public money to make the best options deliverable, is obliged to use its scarce resources in ways that will use the least public investment possible to deliver the greatest benefits achievable. The Council cannot escape making the hard choices required to get this as right as it possibly can. Because the Council ultimately has to justify the expenditure of public money to government, objective evidence has to play a major role in guiding such decisions.

The Town Council needs also to understand that some matters – though considered by the AAP – are not determined by the AAP's planning policies. Removing parking from the shopping core, for example, will require Traffic Regulation Orders (TROs) which will be consulted on. The AAP sets out the rationale for the proposals (because they are part of the evidenced strategy), but the AAP also explains that the next step will be consultation on the Orders when they are made. The Publication Document AAP sets this out at paragraph 3.95; and refers again to the expected timing of the Traffic Regulation Orders in paragraph 6.19.

The AAP's role is similar in respect of the Town Council's wish to see an Olympic swimming pool on the Leisure World site. The AAP's Seafront policy permits the possibility of redevelopment for this type of use, but does not prescribe it. Paragraph 3.77 of the AAP explains that the Council will consult on the options for the redevelopment of the Leisure World site should Leisure World in its present form cease. The Council comments further on both the parking and Olympic swimming pool examples below. The parking issue is considered fully in this note on pages 5-6 (points iii and iv, in the context of the evidence base on the town centre), and again on pages 21-22 (in the responses to the Town Council's comments); and the Olympic swimming pool option is considered on pages 13-14 and 24.

PART TWO - Précis of the AAP's evidence; the basis for the AAP's response to the Town Council's comments on shopping, parking and housing in the AAP area

The evidence for the AAP is comprehensive, robust on the facts, the research base and the analyses, and it is up to date.

All the forecasts of Bridlington's future potential also take into account the effects of the economic downturn since 2008 and the squeeze on the public sector's finances on the town's prospects and capacity for growth—including in the housing and retail sectors.

The Council appreciates that in some instances, the evidence that justifies the AAP's proposals may seem counter-intuitive (e.g., improving accessibility by removing on-street parking so the shopping core, and improving competitiveness by introducing more shops into the town centre). But the fact that some of the AAP's proposals may seem counter-intuitive does not diminish the weight of evidence in their favour.

This note briefly summarises below the evidence for the AAP in respect of the Town Council's particular concerns on the AAP's proposals for additional retail floorspace, removing the bulk of on-street parking from the shopping core and increasing the housing in the AAP area generally and in the Burlington Parade and Marina schemes particularly.

➤ ***The town centre needs a shopping offer that is competitive and appeals all year round***

The town centre very significantly 'underperforms' as a shopping centre. The retail evidence draws on the findings of a representative sample of households in Bridlington and its wider catchment. The methodology used is the standard for the industry, and is one of the principal sources of evidence used by retailers and developers in making decisions as to whether or not to invest in any individual location. The Council is required by national and regional policy to prepare and use this type of 'retail capacity and vitality and viability' evidence in drafting its local development plan documents. The other sources of evidence include interviews with existing traders, 'health and vitality' indicators (like trends in rental levels), and analyses of the reasons for a town centre's performance. The data inputs on household expenditure have been kept up to date, and reflect the impact of the recession and the slow return to economic growth.

Were Bridlington performing as it should, given its size and relative isolation from competing centres, the town centre would reasonably be expected to attract *at least half* of its catchment's comparison goods expenditure.

This is very far from the case. The retail evidence for Bridlington shows that comparison goods¹ retailers in the town centre together currently retain just 27% of the spending by the residents of Bridlington's immediate catchment on non-food 'comparison' goods.² Bridlington town centre's very low, 27%, share is despite the fact that Bridlington town centre has more shops and retail floorspace (212 shops, 35,340 sq m) than Beverley town centre (173 shops, 32,860 sq m) which attracts some two and half times more comparison trade than Bridlington. Beverley captures this significantly higher share even though Beverley is very close to Hull city centre (see page 65 of the England & Lyle retail study for the East Riding on the Bridlington Regeneration website).

It is, therefore, beyond dispute that the town centre's existing retail offer performs poorly. The fact that it does also undermines Bridlington's potential for developing a stronger, less seasonal, tourism economy. The beach offer compensates for the appeal of the town centre in the summer season – but clearly does not do so for the remaining eight months of the year. The Spa, though a great success in its own right, is also 'let down' by the poor performance of the town centre's retail offer.

Thus Bridlington must very significantly improve its performance as a shopping centre if it is *both* to serve its resident and catchment population better and to support the growth of higher spending, year round, tourism in Bridlington.

¹ 'Comparison goods' is the technical name for most non-food goods – like shoes and clothing, household goods, electrical goods and so on. The word comparison is used because people tend to 'compare' prices of these items before buying.

² The evidence on retention is in RTP's 2006 retail study and the 2010 update on the Bridlington Regeneration website. Bridlington's resident population totals about 40,000; the resident population of the catchment the town centre should serve as the 'shopping centre of choice' also totals about 40,000; and, therefore, Bridlington town centre should be competitive in attracting about half or more of this expenditure on comparison goods. Visitor spending is additional to this potential.

The work for the AAP involved a great deal of study and analysis to try to understand why the town centre's existing shopping offer is not more competitive. The Publication Document AAP (October 2010) explains the 'causes' of the town centre's underperformance more fully at paragraphs 1.13, and paragraphs 4.70-4.71. Key reasons include:

- the very large extent of the shopping centre (most especially the very long secondary streets that lead into the core of the town centre), the effect of which is to spread too little spending and footfall over too large an area for individual shops to prosper;
- the predominance of very small retail units that make it difficult for enough traders to offer a range of goods and a comfortable shopping experience for enough shoppers to draw more people into the town centre (and more often, throughout the year);
- the costs and other deterrents to private investors entailed in assembling a site big enough to create space for larger units;
- the low rents and property values, which make it hard to make a decent return on any investment in creating new retail units (the low property values are also a consequence of the town centre's problems, but are a deterrent to further investment too);
- the adverse impact on the quality of the shopping environment caused by traffic circulation, on-street parking and the seasonal activities;
- shortcomings in the quality, location and sufficiency of parking and in the quality of some of the public realm; and
- the management of many of the small shops that gets in the way of their ability either to offer year-round customers what they want to buy or to provide the kind of shopping experience that will induce shoppers to choose their shop / Bridlington town centre over other alternatives for their shopping money.

If the town centre is to improve its performance – year round – it will have to capture a much higher share of the catchment's expenditure on comparison goods particularly (and fashion good especially). To do so, the changes to be introduced need *both* to tackle the causes of the town centre's underperformance *and* capture its particular opportunities.

- i. Because the range and types of goods in the town centre's existing shops play a big part in the town centre's underperformance, new retail floorspace is required that will bring in more shoppers to the town centre. This need cannot, in any evidenced way, be disputed.

The up to date retail evidence shows that if the town centre is to trade closer to the level it should, then some 13,370 sq m (gross) of additional retail floorspace for the sale of comparison goods is needed by 2016; and a further 5,340 sq m (gross) by 2021.

- ii. The additional retail floorspace needs to attract the kinds of retailers that are capable of attracting new, additional, customers to the town centre and encourage others who sometimes shop in Bridlington to come much more often. To attract the new retailers that will do this, particularly in the sectors (like fashion) in which the town centre is especially weak, new retail units need to be the size and shape that will appeal to them.

It is not feasible or deliverable to meet the need for these units on an incremental 'store by store' basis. The development industry rarely works in this way, and will certainly not do so to deliver the scale of new retail provision needed to achieve the fundamental reversal required in the town centre's trading position.

The only feasible and deliverable means of attracting a significant number of new retailers into the town centre is to provide a concentration of new unit shops in a good quality trading environment that can also build on the existing core of the shopping centre.

It is not feasible to create a site for such development immediately adjacent to the established shopping core. If there were this possibility, the AAP would have pursued this. The next best – and very good – option was to create a site as close to the existing shopping core as possible, and at the same time to ensure that the new location is on an already established pedestrian route. The AAP does this. The distance between the ‘entrance’ to the designated unit shop site and the top of Chapel Street is just 310 metres – equivalent at the very most to a five minute walk, even for people whose mobility is impaired (for many it will be no more than a three minute walk).

- iii. The town centre’s parking provision – parking numbers, location and quality – needs an over-haul. The surface car parks are not as attractive as they should be, undermine the visual appeal of the town centre and take up a lot of land. Well-designed decked provision is much more efficient and attractive to shoppers where it is conveniently located. The existing Palace Car Park, the two Beck Hill car parks and the Langdale car park are all well used, all year round. The Council keeps records of usage and income, and the evidence shows this. The reason why these car parks perform well is that they are conveniently located. There are not, however, enough convenient (and attractive) parking spaces to support a competitive, growing town centre.

The AAP proposes to increase the numbers of spaces in each of these locations, and to create well-designed, safe and attractive multi-storey car parks to replace the surface provision. What is now the Coach Park car park will also have more car parking spaces (the AAP provides for up to 700), and the adjoining unit shop scheme will also add some 350 further additional spaces to serve the town centre.

The AAP explains the parking strategy at paragraphs 3.97-3.105; and Policy BridTC8 sets out the provisions.

- iv. The number of on-street parking spaces within the core of the shopping centre needs very significantly to be reduced – both to remove the adverse effects on the appeal of the shopping centre of the traffic intrusion and to reduce the traffic generated by people driving along these streets to find spaces. The additional, conveniently located, car parking in Burlington Parade will more than compensate for the removal of these spaces.

The evidence in favour of pedestrianisation (or part pedestrianisation – e.g., pedestrianisation only during shop hours) is long-standing and convincing. The evidence shows that well designed schemes lead to very substantial increases in pedestrian footfall and higher rates of turnover in the benefiting streets. Footfall increases because shoppers find traffic-free streets much more appealing places to visit and linger in; turnover rises because the traders on the benefiting streets have the chance to pull in more customers; and the quality of the traders represented improves because the best shops like to be where their customers are. The removal of the parking creates opportunities to provide attractive landscaping, lighting, street furniture, public art and the like; and these improvements add still further to the appeal of pedestrianised streets. The improved physical setting for the shops – and the added custom and profits – also helps to encourage traders to maintain their shop fronts and keep them interesting, and makes it possible for cafés and the like to spill into the street in good weather.

In many smaller town centres, there can also be benefits in designing pedestrian schemes so that cars can use them after shop hours, helping to maintain their vitality in the evenings and weekends.

The evidence also shows that it is commonplace for proposals to remove on-street parking and introduce restrictions on servicing hours to be controversial when proposed. Retailers fear their trade levels will fall and shoppers fear their accessibility will be compromised. Invariably, however, the evidence shows that once well-designed schemes bed in, they are greatly welcomed by retailers and customers alike. Typically too, other traders on still trafficked streets then clamour for the pedestrianisation scheme to be extended to include their streets too.

- v. The effects on Bridlington town centre of the seasonal visitors are problematic – but the vitality of the town centre requires that it works both for residents and for visitors. The added traffic, congestion and general crowds during the summer season discourage local users from using the town centre in the summer and as a result locals tend to use the town centre less than is desirable the rest of the year too; and many of the small retailers appear to target seasonal visitors at the expense of their year round custom. Largely for this reason, two of the least successful shopping streets in the town centre are Cliff Street and Prince Street – the streets that join the Seafront to the rest of the town centre – despite the presence of Marks & Spencer (and before it closed, Woolworths). Thus, the year round activities of the town centre need to be supported with fewer adverse effects from the seasonal activities.

The AAP's response (as part of the package of changes needed to tackle the evidenced causes of the town centre's underperformance) is to re-draw the boundary of the primary shopping area so that it does not overlap so greatly with the Seafront; and to encourage in this area and on the Seafront changes of use and new development that will appeal all year round.

There is, however, no evidence at all to suggest that Marks & Spencer will move from Bridlington as a consequence of this change.

- vi. Existing traders in the town centre are not performing competitively. While, without doubt, the growth of modern multiple trading in the UK has been at the expense of many small traders, the fact also remains that small, independent, businesses that are well managed, offer the customers what they want and provide good service, do survive and thrive.

Existing traders in the town centre are (of course) concerned that the introduction of large new shops will undermine the town centre's already fragile independent sector.

The fact is, however, that the existing retailers – notwithstanding the importance of helping them to become more competitive – have proven themselves unable as a group to increase the town centre's trade share to a level consistent with Bridlington's size and relative isolation.

Therefore, there is no alternative other than introducing new, additional, shops that are strong enough to attract more customers into the town centre; and by bringing in more customers to the town centre, giving the existing traders a chance to compete for these customers too. The evidence is indisputable: without a significant influx of new retailers, the town centre will decline still further as other centres – all some distance from Bridlington – continue to grow and improve and take a higher share still of the shopping expenditure from Bridlington and its catchment.

The evidence also shows that two things are essential to ensure the introduction of the new shops into Bridlington town centre works to the advantage of existing traders, and therefore to the advantage of the town centre as a whole: first, the new retailing needs to be a natural extension to the existing shopping core and easily accessed from it; and, second, the existing shopping core needs improvements at the same time that will improve the trading conditions in that part of the town centre too.

The AAP, for this reason, contains measures that *both* introduce new retail shops in a location that is close to the existing core and easily integrated with it, and very significantly improve the shopping environment of the existing shopping area. The latter measures include: two new, well-designed, decked car parks that are conveniently located to the established shopping area (a redeveloped Palace Car Park, linked to the new Gypsy Race Park, with the decked arrangement making it possible both provide more parking *and* the new park; and a new decked car park to the south of Beck Hill to the rear of Manor Street); the widening and landscaping of Quay Road/Prospect Street/Manor Street; significant public realm improvements in the established core and Seafront; and the regeneration of the Harbour with its greater integration with the town centre.

The new policies for the Seafront, in turn, will make it difficult for future developments to secure planning consent for uses that have a seasonal market only (reducing the adverse effects of the seasonal activities, in and out of season, on the shopping core); and also encourage changes of use to the kinds of activities and housing that will animate the area and make it appealing all year round (complementing the shopping core).

The AAP (with its focus on the use of land) cannot do anything particularly to improve the management (and therefore the competitiveness) of the less successful small independent traders – but it can improve their trading conditions. The existing traders should – in this renewed environment – find it much easier to compete for the expenditure of the increased numbers of shoppers they will have access to all year round.

These changes – coupled with the investment in the Spa and Harbour (with the proposals for a new hotel) – will also make the town centre more attractive to visitors for a longer part of the year. The limited appeal of the town centre at present is one of the factors that explain why it has proved so difficult to widen Bridlington’s visitor season and diversify its visitor market.

➤ ***Housing development is fundamental to the town centre’s regeneration***

There are three reasons why the AAP, as part of the regeneration strategy, has to promote additional housing on the scale it does:

- i. Population growth drives economic growth. The AAP area needs to appeal to more, and a wider range, of people as a place to live. Population growth is Bridlington’s great strength. A share of the forecast population growth needs to be directed to the central part of Bridlington to support its shops, places to eat and other attractions because:
 - Residents make a huge positive contribution to the vitality and viability of any area. They increase the opportunities for local shops to attract their retail spending money; they provide restaurants and cafés with ready customers; and they are in town all year round, helping to animate the public spaces and making them safe throughout the day and evening and on weekends.
 - The added housing choice improves the chances of attracting a more diverse range of households and skills to Bridlington (helping to raise average incomes and diversify, and strengthen, the local labour market).
 - People living in the AAP area are less likely to need to take public transport or drive to use the town centre’s shops and other services.
- ii. It is more environmentally sustainable for housing to be developed on brownfield land, and to be located where it can also make use of existing infrastructure and reduce the need to travel to meet shopping and other needs.
- iii. Housing as part of a development mix makes it feasible to deliver regeneration that otherwise would simply not be possible. This is the case both for Burlington Parade and for the Marina.
- iv. Bridlington is required under present regional and emerging local policy to contribute a significant share of the housing that the East Riding is obliged to deliver by the Regional Spatial Strategy³ to meet the district’s housing needs. The AAP area, in accommodating a share of Bridlington’s housing growth, will benefit.

³ While the present government intends to abolish the Regional Spatial Strategy as part of the ‘development plan’ for Bridlington, it cannot do so until the Localism Bill has completed its Parliamentary process and the regulations required are brought into force. This is unlikely to be the case before the middle of 2012. Until the Localism Bill is in force, the Council is obliged to plan for the housing numbers set by the RSS. Meanwhile, East Riding Council is reviewing the housing need and employment forecasts for the district; once the RSS is abolished, the Council will have the local evidence base it needs to plug the gap that will be left. The Council will of course consult on this evidence and its implications for local development plan documents.

The Publication Document AAP explains, at paragraphs 4.97-4.104, why housing forms an essential part of the strategy for improving the appeal of Bridlington as a place to live for existing people as well as a place to visit. The AAP also contains proposals to ensure that the additional activity – e.g., demand for public transport use, parking, trip-generation – can be accommodated on the local highways network without increasing congestion.

➤ ***The Marina proposals are very different in scale and layout to the Marina proposal that failed to secure the needed Harbour Revision Order in 2003***

The Council and Harbour Commissioners have – of course – made certain that the new proposals address each of the reasons why the original Marina was not consented.

The area of beach proposed by the AAP for land reclamation for the Marina is very considerably smaller than the 2001-2002 Marina proposal. The Marina proposed by the AAP reclaims – in the layout agreed between the Commissioners and the Council – about 1.7 hectares of land (partly beach and partly tidal area); the 2001-2002 Marina proposed to reclaim 14.7 hectares of beach and tidal area. The exact area of land to be reclaimed for the new Marina will be settled by the Business Plan study that is being jointly commissioned, but the order of magnitude is correct on the basis of the evidence already in place.

There are also provisions in the AAP that will ensure habitat is safeguarded or compensated – whatever is required when the detailed work is done. As the Town Council might expect, the Council has worked closely with Natural England on the proposals. AAP Policy BridTC4.2 and BridTC4.5 make provision for the environmental sustainability of the proposed Marina. The Council is also proposing a minor amendment to the AAP which will further strengthen its provisions in respect of mitigating the effects on and/or compensating for lost habitat.

The Town Council needs to acknowledge that the scale of the non-operational development proposed on the reclaimed land by the AAP is *very* significantly smaller than that promoted by the 2001-2002 Marina proposal. The 2001-2002 Marina plan assumed (for the purposes of the economic impact study) that the reclaimed land would accommodate 240-312 housing units (at a low density); 900-1,350 sq m of retail floorspace; and 2,625-3,375 sq m of offices.

Additionally – and critically – the AAP's focus is on regeneration within Bridlington's existing town centre, not on new land. The AAP locates the vast share of the new development it promotes where it can both redevelop land that is under-used, in poor condition or despoiled and benefit the established shopping core.

Apartments with or near to sailing berths are an attractive offer commercially, and help make the Marina more valuable to Bridlington's regeneration. And – like the other housing promoted by the AAP – the Marina-related (and the Burlington Parade) housing will bring more residents into the town to spend money in local shops, eat and drink locally, give the town centre year round vitality, add to the local labour market, reduce the need to drive or take public transport into the town centre, help diversify the labour market, and contribute to the substantial costs of the Marina (helping to justify the public sector's investment in it). Paragraph 3.39 of the AAP explains the purposes for non-operational development on the reclaimed land and sets key limits to it.

Finally, the beach is *not* 'greenfield land' in the terms of any national planning policy or coastal directive. Appendix 2 to the Publication Document AAP, at paragraphs 77-83, explains the AAP's compliance with the relevant national policy on managing coastal land (Planning Policy Statement 25 – Development and Coastal Change, March 2010)

➤ ***The traffic generation effects of the AAP's development proposals have been thoroughly tested to ensure that there is sufficient capacity to accommodate the additional vehicle movements.***

All of the evidence shows that there will be no increase in traffic *congestion* in the town centre with the implementation of the developments and the delivery of the access and moving and parking strategies. The Council has already implemented changes in signage to divert traffic destined for the south beach area away from the town centre; delivered the park and ride; and put the variable message signage in place to direct people to car parks with spaces. The new car parks will also make use of this system.

PART THREE - The Town Council's comments on the First (2007) and Second (2009) Preferred Options drafts of the AAP

The Town Council, in its Publication Document AAP Representation, states that the Council has not made any changes to the AAP in response to the Town Council's or others' proposals. This statement is not accurate.

The Second Preferred Options Draft AAP sets out in full, at the beginning of each section, the way in which comments on the first Preferred Options Draft were taken on board in the Second.⁴ The Council sets out below the ways in which the Council has amended the AAP to respond to the Town Council's specific comments, and where it has not, the reasons why. This note allows a fuller response to the Town Council than was possible within the space constraints of the Council's formal 'report(s) of consultation'. Part Four of this note deals with the representations on the Publication Document AAP.

The Town Council's comments on the First Preferred Options AAP and the Council's response

The Town Council submitted the minutes of its 4.12.2007 meeting as its formal comments on the first Preferred Options Draft; each of these comments is summarised in italics below. The Council responds in each case where it has taken on board the Town Council's views, and where the Council has not, the reasons why. The reasons in each case relate either to the greater merits of alternative proposals – based on the evidence as to what will be effective, feasible and deliverable – and/or to the Council's obligations under national or regional policy.

- *New development should preserve and enhance the predominantly late Victorian and Edwardian character of the town*

Both the first and the second preferred options draft AAPs contained policy proposals that aimed to require what the Town Council requests. The second (2009) preferred options draft considerably strengthened these policy proposals in response to comments on the first preferred options draft. The second preferred options draft AAP also introduced a draft Supplementary Planning Document (SPD) that sets out the design guidance to be observed in the AAP area; and the proposed policies required new development to comply with the guidance in the SPD. The Council still further, in time for the second preferred options stage, designated a new conservation area within the AAP area, again to provide a basis for enhancing as well as protecting (where features merit it) its distinctive historic character.

The SPD contains very considerable detail on the typology of the town's historic architectural character that is to be respected by 'contemporary' developments. Chapter 4 of the SPD sets out the detailed guidance for this in full.

The revisions to the AAP therefore did exactly as Town Council requested. The Council set out this intention in its response to the Town Council in the Report of Consultation (page 152) on the first (2007) preferred options draft AAP. For this reason, amendments to the AAP awaited the completion of this work.

- *A multi-storey car park should be incorporated within Burlington Parade*

⁴ The Town Council did not submit any comments in writing on the Issues and Options stage (although the Town Council was represented on various bodies that did attend the various consultation events and who commented).

The AAP, at both preferred options stages and the Publication Document, includes for four multi-story car parks within Burlington Parade: with the unit shop scheme in the north; on the site of Palace Car Park; to the rear of Manor Street, accessed from an upgraded Beck Hill; and on the Harbour Top.

The AAP therefore provides exactly for what the Town Council requested.

- *The Town Council does not favour development at the west end of the Harbour or a new south pier unconnected with the marine activities in line with the 'Coastal Planning Guide', Marina section*

The Council cannot agree that there is a 'Coastal Planning Guide' that states that development on a town centre coastline is unacceptable if it is for non-marine purposes.

There are several national planning policy statements or guidance notes that support the proposed development of the Harbour Top (part of which lies within the town centre boundary). The Town Council may wish to refer in particular to the March 2010 supplement to Planning Policy 25 – Development and Coastal Change, which cancelled the previous guidance – Planning Policy Guidance 20 (PPG20). It is available on the Communities and Local Government website. The AAP is in conformity with its provisions, as it was with the guidance which applied when the first and second preferred option drafts of the AAP were prepared (this was PPG20 which, for example, directed development for tourism uses on the coast to existing urban areas).

The proposals are also in keeping with government guidance on the responsibilities of Trust Port operators to the communities they form part of (contributing to regeneration is one of these). The Council added, in the second preferred options draft AAP, an explanation of the Trust Ports duties to their local communities at paragraphs 1.58-1.59.

The development on the Harbour Top is needed to regenerate the Harbour (by adding to the town centre's offer – places to live, eat and drink, visit and shop), remove the adverse effects that this part of the Harbour presently has on the town centre, and make use of this critically important, but much under-utilised heritage asset for the benefit of Bridlington as a place to live, but especially as a place to visit. The development is also needed to generate income to help finance the capital costs of regenerating the Harbour and contribute to the revenue income needed to finance the Harbour operations. An option that failed to do any of these things would leave 'untouched' important reasons for the town centre's underperformance and fail to realise the potential of an important, but under-utilised and down at heel, heritage asset. Paragraph 1.48 of the 2007 (first) preferred options draft of the AAP explained this; and the Council set this out at page 153 of the Report of Consultation in response to the Town Council.

Finally, the development of the Harbour Top is one of the two principal value-generators (the unit shop scheme is the other) that make it feasible, commercially, to deliver the much needed regeneration of the back land between Hilderthorpe Road and Prospect Street/Manor Street and give the dying Hilderthorpe Road frontage the new purposes it needs. The Council could not therefore justify amending the AAP to remove the proposals for developing the Harbour Top as the Town Council wished.

- *The Town Council considers that no buildings should be erected on South Cliff garden*

At no stage has the AAP proposed development on South Cliff garden. The boundary line in the Proposals Map that takes in South Cliff garden simply places the garden within the town centre boundary; the boundary line does not imply in any way that the site is allocated for development.

The Council, therefore, had no need to amend the AAP's proposals to preclude development on South Cliff garden.

- *The Council does not favour Bridge Street / Queen Street as the location of the new town centre square*

The rationale for Bridge Street/Queen Street relates to the proposals for Burlington Parade, including the Harbour Top, and for opening up Gypsy Race to provide the spine for the development and the centrepiece of a new park. A town square in the Bridge Street / Queen Street reinforces and adds value to the substantial investment in these schemes, and brings year round activity to these parts of the town centre. The benefits to the established retail core will be significant – and are much-needed.

The Council, therefore, could not justify amending the AAP to change the location of the proposed new Town Square. The AAP does provide for the possibility of a further square at Prince Street / Cliff Street, and these provisions were strengthened in the Second Preferred Options Draft AAP. The Council therefore went part of the way to acceding to the Town Council's wishes.

- *The Town Council considers the relocation of the Fun Fair to another location would be beneficial*

The Council accepts that the Fun Fair is problematic out of season (Publication Document paragraphs 3.66-3.67). However, it was not feasible to relocate the Fun Fair and the AAP had to acknowledge this; so instead the AAP promotes a change of policy for the Seafront with the aim of encouraging changes of use to year round activities.

The Council strengthened the AAP's provisions for the Seafront in the Second Preferred Options Draft. The Council responds more fully on this point on page 18 of this note.

- *The Town Council considers that if Leisure World were lost, it should be replaced by an Olympic size pool*

The AAP does not preclude the possibility of an Olympic swimming pool. It cannot specify one because there is no evidence that such a facility would be deliverable – that is, that the public money needed would be forthcoming, that its usage would merit the investment and that the money would be best spent on an Olympic pool rather than other schemes for Bridlington's benefit.

The Council also undertakes to carry out – and the second preferred options draft and Publication Document AAP provide for – further consultation on the future for Leisure World and the site it occupies. The Council comments fully above on the role of the AAP in respect of what use is made of the Leisure World site should the present use cease; and points out that the Council will consult on the options once it has done sufficient work to identify them. Again, however, plausible options must have a reasonable chance of delivery.

Therefore, the revision to the AAP's provisions in the second preferred options and Publication Document AAP meet the Town Council's wishes part way; the Second Preferred Options Draft AAP also added to the policy for the Seafront, and an Olympic pool could be justified by it if there were a case for an Olympic pool. The Publication Document AAP retains these provisions.

- *The Town Council does not accept 'renaming' Hilderthorpe Road 'Burlington Parade'*

This is a misunderstanding. Hilderthorpe Road will keep its name. Burlington Parade is the working name for the comprehensive development area that lies between Hilderthorpe Road and Quay Road/Prospect Street/Manor Street and extends into the Harbour Top. The first (2007) preferred options draft AAP explained that Burlington Parade is a working name in the summary of the preferred strategy at page iii, in introducing the AAP's strategy at paragraph 1.2 and again in the discussion of the Burlington Parade proposals at paragraph 1.40. The Council also explained this in its response to the Town Council in the Report of Consultation (page 153) on the first preferred options draft AAP.

There was, therefore, no need to amend the AAP to respond to the Town Council's comment.

- *The Town Council considers that the proposal to open up the lane from Bridge Street into the Harbour Top is a waste of public money*

The opening up of Gypsy Race between the Coach Park site and the Harbour Top, with the park and pedestrian avenue and cycle lane alongside it, is one of the principal unifying features and value-drivers of the Burlington Parade scheme. The proposal takes advantage of a distinctive local assets – making the very most of it – and uses it to solve the significant problems of a large area of under-used, ineffectively used, and in parts semi-derelict ‘back land’ that lies between Hilderthorpe Road and Quay Road/Prospect Street/Manor Street.

In providing a device for solving this problem, the Gypsy Race scheme helps to create development opportunities (and generates the property values) that the evidence shows will attract the development industry to deliver the types and quality of schemes needed to regenerate this otherwise problematic area. That this is the case makes clear that the proposals are not in fact a waste of public money, but instead essential to the area’s distinctive, ‘true to Bridlington’, regeneration.

The Council could not, therefore, justify the Town Council’s wish to amend the AAP to attenuate the Gypsy Race scheme with what would be a ‘dead end’ at Bridge Street; the effect of the dead end would be to very seriously compromise the purposes of that scheme and the very significant value it has for the commercial deliverability of Burlington Parade. The Gypsy Race feature is also hugely welcomed by the vast majority of the other consultees to the AAP.

- *The Town Council considers 600 housing units in the town centre to be excessive, unless allocated to people who cannot afford to live elsewhere or who do not aspire to acquire private transport*

The housing, on the evidence, is critical to correcting the causes of underperformance in the town centre, meeting housing need sustainably, adding to the local labour market and helping to make the regeneration schemes deliverable.

The Council could not justify removing from the AAP the significant level of housing needed to enable the achievement of the regeneration objectives for Bridlington. To do so would be contrary to the evidence that informs the AAP.

The Second Preferred Options Draft and Publication Document AAP nonetheless responds to the concerns expressed by the Town Council and others, and introduces a lower range of housing units to promote ‘not fewer than’ 500 housing units and ‘not more than’ 600 housing units.

The Council therefore agreed to a change that goes at least a small part of the way wished by the Town Council.

The Town Council’s comments on the Second Preferred Options AAP and the Council’s response

The Town Council made many of the same or very similar comments on the Second Preferred Options Draft AAP (email to John Lister, 17.9.2009) that it did on the first, and added to these the additional comments summarised in italics below. Again, the Council sets out its response to each.

- *The Town Council does not accept buildings on the Marina or Harbour that are five to seven stories high, and states that the view from South Cliff Road [to the Harbour and sea] should be maintained*

The Supplementary Planning Document (SPD) that was published alongside the Second Preferred Options Draft AAP sets the maximum building height above the level of South Cliff Road at five stories, save for the height of the separate, much smaller, block for the hotel which is set at seven stories. The SPD also requires the Harbour Top buildings to have varied roof forms and building heights compatible with the town centre’s traditional built form (SPD, paragraph 7.37).

Views will be maintained through gaps between building blocks and from other parts of the town centre.

It is simply not realistic to expect to take advantage of Bridlington's distinctive assets and opportunities and at the same time expect to preserve, undiminished, the existing views of all of the seafront properties. Many of these views, however, will be unaffected. The land overlooking the Harbour (and Marina) is needed to drive the badly needed regeneration of the town centre.

The AAP therefore goes some of the way towards addressing the Town Council's concerns. The Council could have been more helpful by pointing this out in its response to the Town Council in the Report of Consultation on the second preferred options draft AAP.

- *The Town Council supports the proposal for a Marina, but does not accept an 'estate' of 200 houses, and considers the Inspector's Report on the 2001-2002 inquiries to state that this is unacceptable*

The Council, as explained on pages 8-9, is not proposing a scale or mix of development on reclaimed land that bears any resemblance to the current proposals; the housing will be part of a use mix, and will not be an 'estate'. Paragraph 11.103 of the Inspector's report needs to be read in the context of the scale of the 2001-2002 proposals and the lack, in the Inspector's view, of the justification for the land take they entailed. In paragraph 11.182, the Inspector stated that he considered the proposals on the reclaimed land 'in principle satisfactory'. The Inspector also concluded that the 'benefits' case for the commercial development was speculative (as no developer was in place who was committed to the commercial development), whereas the adverse environmental effects of the 14.7 hectares of 'beach take' was certain.

The Publication Document AAP not only proposes little more than 10% of the beach take proposed in 2001-2002, but sets out policies which couple the Marina's delivery with strong tests to be satisfied on its environmental impact before planning consent can be granted. The AAP is also supported by compelling evidence on the deliverability of the far more modest housing and commercial development proposals (the lack of this evidence was a shortcoming that contributed to the refusal of the 2001-2002 marina proposal).

Finally, the AAP is a *plan*. It is not an application for a Transport & Works Act Order or any other kind of order. The AAP sets the tests that the applications for the Marina orders will have to meet if they are to be confirmed by the Secretary of State. These tests, as Policy BridTC4 makes clear, are stringent, and they have the support of Natural England and the Council proposes (see pages 9-10) a minor change to the AAP that will strengthen them further.

- *The Town Council considers that the existing arrangements for on-street parking in the shopping core should remain; that the predominant market for the town centre is elderly people; and such a proposal would favour holiday makers over residents*

The Council sets out the evidence for removing the on-street parking on page 6 of this note, and points out where in the AAP it explains that the proposals will be subject to consultation when the needed Traffic Regulation Orders are made (Publication Document AAP, paragraph 3.95).

Those aged 65 and over (using the 2001 Census data) represent 23.9% of Bridlington's resident population, and a slightly smaller share of the other 40,000 who live in Bridlington's catchment (compared to 16.1% of the population aged 65 and over in the Yorkshire & Humberside region). Those aged 75 and over represent 11.8% of Bridlington's population and 6.9% of the region's population. While the town centre must be as accessible to the elderly as to any other group of users, the Council has no intention of reducing the number of disabled spaces or of reducing its Shopmobility scheme. The safety improvements of removing traffic from the shopping streets will also benefit the elderly and less mobile.

The primary reason, as the AAP explains at length, for improving the competitiveness of the shopping centre is to attract spending from the resident population, all year round. It is mistaken to suggest that the changes proposed are orientated first to the needs of tourists. On the contrary, very significantly improving the appeal of the town centre to Bridlington's and its catchment's residents is the means of ensuring the town centre is also more appealing to tourists, all year round. While the AAP can promote the improvements required in the shopping environment of the established core, it cannot effect the changes that are governed by a Traffic Regulation Order (TRO). Therefore, although the Council could not, for reasons set out in the evidence, accede to the Town Council's wish to remove from the AAP the Council's intention to seek to remove the parking provision on the shopping streets, the Town Council will have a chance to put its views to the Council when it promotes the required TRO.

- *King Street should be opened to vehicular traffic, and the market should be relocated to Prince Street*

The AAP makes no restrictions that prevent either of these options.

The commentary above explains that the Town Council will have the opportunity to respond to the changes that require a Traffic Regulation Order. The Council's highways experts will also be happy to show the Town Council the traffic circulation evidence that supports the present arrangements – and to show the Council the modelled implications of the alternatives the Town Council suggests.

The Council stated (page 22) in the Report of Consultation on the second preferred options draft AAP that it would keep the Town Council's views on King Street in mind. The Town Council will need to accept that proposals of this type require an evidenced basis for change. The Council's evidence is that the present arrangement is preferable, and therefore the Council could not agree to amend the AAP in the way suggested by the Town Council.

- *The Council would like the proposed replacement car park for the Palace Car Park to provide for more than the 255 spaces indicated by the AAP*

The Council may find that it is possible to increase the number of public parking spaces beyond the 255-260 spaces indicated by the (2009) second preferred options draft AAP as the detailed work is done on the proposals; the 2009 draft AAP explains (paragraph 4.107) that the numbers of spaces indicated are 'order of magnitude' numbers.

The capacity of the car park will be driven by physical conditions, cost and design considerations – as well as the parking standards the Council is obliged to observe by regional and national policy and the traffic generation effects of the provision. The Town Council will also have the opportunity to comment on the planning application covering the Palace Car Park when it is made.

The AAP therefore required no amendment to deal with the Town Council's comment.

- *The Town Council is concerned that the redevelopment of north Hilderthorpe Road is not in prospect 'for the foreseeable future'*

The Council reassured the Town Council on this point in the Report of Consultation on the 2009 preferred options draft AAP (page 22) and explained – the Town Council will know this – that Hilderthorpe Road had been declining for a very long period and had largely lost its retail role, but the Council also accepted that regeneration is a lengthy project. The 2009 second preferred options draft AAP also set out the delivery timescale for Burlington Parade on page 190.

The Publication Document AAP contains more detail on the delivery programme in response. The Town Council will find the development timetable in the Publication Document AAP on pages 128-130. The developments are timetabled, and the first phase will be the northern part of Hilderthorpe Road.

The 2009 second preferred options draft AAP extended its delivery timetable from 2016 to 2021. The best evidence available suggests the AAP's proposals should be complete or begun within this period. The Council, therefore, concluded in response to the Town Council's comment that no further extension was required to the AAP's timetable – which is within 'the foreseeable future'.

- *The Town Council considers that the AAP pays inadequate attention to global warming and the effects of climate change, with particular concern for the storm water tanks within the Burlington Parade site and the effects on the Gypsy Race*

The Council reassured the Town Council on this point in the Report of Consultation on the 2009 preferred options draft AAP (page 23); and can again. The Publication Document AAP pays very considerable attention to global warming and the effects of climate change. The Council refers the Town Council to the discussion and provisions of Publication Document BridTC3 in respect of Burlington Parade, the Gypsy Race, flood risk and sustainable urban drainage systems; to BridTC4 in respect of the Marina, water quality and flood risk management; to BridTC5 in respect of the Strategic Public Realm and its role as 'green infrastructure'; to BridTC6 in respect of development on the town centre Seafront and flood management; and to BridTC11 in respect of design for the built and natural environment and flood risk management.

The Council and its advisers were, of course, aware of the storage tanks within the Burlington Parade site, and have been in discussions with Yorkshire Water from the outset of the AAP's preparation to ensure that the scheme's proposals (including for storm water capacity) will withstand the risks entailed in climate change.

The Council, nonetheless, strengthened the Publication Document AAP's provisions in respect of flood risk management and green infrastructure. The AAP therefore takes on board the Town Council's concerns.

- *The present Tesco store is adequate, and the Hildertorpe Road car park should be put to a more useful use*

The Council can reassure the Town Council that the AAP proposals represent, on the evidence, the best alternative, all matters considered (and explained this in the Report of Consultation, page 23).

The Coach Park site is well-configured and of a size that is attractive to Tesco given their standard format stores, national planning policy that requires such stores to be flexible in developing their standard format so that they can be accommodated in town centres, and the forecast capacity of the town centre to accommodate further retail development.

The site of the existing Tesco store, coupled with the additional land and property around it that the Council is in the process of acquiring by negotiation, creates a commercially very attractive site for extending the town centre shopping core in the way that the evidence shows Bridlington very badly needs. This site, as designated by the AAP, performs better for this purpose than the other plausible alternatives.

The Council also disagrees that the Tesco store as laid out is 'adequate': it turns its back on the railway station; provides a surface car park as frontage to the principal shopping street; presents a very poor gateway into the town centre from the station; and is poorly integrated with the rest of the town centre's shopping offer. It fails to meet for these reasons more recent national policy standards for supermarkets that are in, and on the edge of, town centres.

The AAP's proposals present a very significant opportunity to correct these problems and create a well-designed and fitting gateway into the shopping core of the town centre from the railway station. The railway station itself is a listed building and part of the town's distinctive historic character. It merits a much better setting.

The Town Council's view on the redevelopment of the Tesco site goes to the heart of the AAP's strategy and is contrary to all of the evidence in the strategy's support. The Council could not, therefore, accede to the Town Council's wishes and remove the proposal.

Summary

It is not correct or fair of the Town Council to assert (in the 20.1.11 email to John Lister) that the Council has failed to consult the Town Council and has made no changes to the AAP in response to the comments by the Town Council and every other consultee.

As the above clarifies, the Council has taken the comments by the Town Council into account, just as it has the comments of every other consultee, and has modified the AAP at each stage of its preparation in response – while also having had regard for the evidence that justifies (or otherwise) the alternative options put forward and their likely deliverability. The evidence, as the discussion above makes clear, has also had to include considerations of the public sector's value for money and the likelihood (or otherwise) that the option will perform better than other alternatives in leading to the outcomes Bridlington's communities want.

What communities want – as has been clear from the outset with the work on the Bridlington Town Charter – is a town centre that better meets the needs of all Bridlington's residents, of all ages and all year round, for a range and choice of shopping, places to eat and drink, things to do and see, places to live and more and better jobs, and to have these needs met in streets, buildings and public spaces that are attractive, well-maintained, safe, easy to access and use, and characterful in ways that respect and protect Bridlington's distinctive heritage.

PART FOUR - The Town Council's Representation on the AAP Publication Document

The Town Council, in its representation on the Publication Document AAP, repeated a number of the comments it had made on the First and Second Preferred Options AAP consultations. Where this is the case, the Council's response refers the Town Council to the commentary in Part Three of this note, but adds further information here, in Part Four, where it may be helpful to the Town Council.

1. The AAP should, but does not, move the Fun Fair away from the Seafront

The Council accepts that although this would be desirable, it is not achievable in the near term. The AAP acknowledges at paragraphs 3.66-3.69 that the Seafront should be one of the most appealing parts of Bridlington – all year round – and that seasonal activities like the Fun Fair militate against this. The AAP also suggests (paragraph 3.68) that the South Cliff area may have the potential to develop a concentration of the kinds of seasonal activities that currently colonise the Seafront; and discusses the proposals for the 'Brid Diamond' – a winter garden incorporating a bandstand – at paragraph 3.71. The AAP, accepting the timescale entailed in effecting these changes, puts in place the provisions that encourage changes of use to year round activities on the Seafront. Paragraph 3.79 sets out the AAP's objectives for the Seafront; paragraph 3.80 sets out the Council's intention to use planning conditions where it can in order to achieve these objectives; and BridTC6 sets out the policy for the year round use of the Seafront.

The Seafront is also promoted for the delivery of very substantial public realm improvements which are set out at paragraphs 3.58-3.63, Policy BridTC5 and in Plan 3.4. Therefore, the AAP does not disregard the Town Council's wishes. It goes as far as is practicable and deliverable in promoting the changes sought on the Seafront; and lays the ground for – and promotes – exactly the changes the Town Council wishes to see.

2. The Marina should not have 200 associated housing units, and the Business Plan study that is to provide the details of the operational land requirements has not been completed; the beach is pristine, is a greenfield site and should not be developed upon; and the view of the Harbour and sea should not be obstructed by buildings

Please also see the comments above (pages 9-10) in response to a similar comment made by the Town Council on the Second Preferred Options Draft AAP, including commentary on the Town Council's reference to the Inspector's report on the 2001-2002 inquiries into the Marina and Harbour orders.

The Council adds to the comments at page 15, the following.

The Publication Document AAP's proposals for the Marina are for 'about' 200 housing units. The number is not prescribed by the Marina policy (see Policy BridTC4.1c). Although the Business Plan study for the Marina is yet to be carried out, enough evidence is already in place – as explained in the written justification of the Marina policy – to establish the order of magnitude of the reclaimed land required (paragraph 3.45 of the Publication Document AAP explains). Policy BridTC4.1.a-c provides for the 'creation and development of the made land needed to help finance and animate the Marina and integrate it with the Spa'.

It is, of course, neither in the Council's nor in the Harbour Commissioners' interests to compromise the operational integrity, or the financial viability, of a major scheme that the Council itself will fund. The Harbour Commissioners and Council have jointly agreed the Marina layout shown in the AAP, and this agreement is documented in the Commissioners' minutes of the joint working sessions.

The Town Council needs to accept that Harbour and Marina developments – if these investments are to succeed in achieving the regeneration benefits that Bridlington badly needs if it is to prosper – cannot escape creating some obstruction of views from some existing premises and public spaces. The design guidelines set out in the Supplementary Planning Document (SPD) are put in place to ensure that the diminution in the views from the affected properties is minimised, and the Marina policy (BridTC4.5) requires that the SPD's guidelines are observed. The success of the Harbour's regeneration and the Marina requires - of course - that many vantage points of the Harbour and sea are retained. Realising the value of the town centre seafront for the benefit of Bridlington's long term future prosperity requires some development along it; this development simply cannot be achieved without some loss, from some vantage points only, of existing views.

3. *Prince Street is the only suitable location for a town square; and Bridge Street and Queen Street should remain open to traffic*

The Council refers the Town Council to the commentary on page 12 of this note in respect of the Town Square location, and to the commentary on page 16 in respect of the arrangements for traffic circulation.

The AAP also promotes the changes on the Seafront that would make it feasible to create a new town square/public space in this location as well in due course; and the improvement works to Prince Street / Cliff Street are promoted by the Strategic Public Realm Policy BridTC6. The relevant information is set out in the Publication Document AAP paragraphs 3.64-3.69, and in particular the discussion of the Prince Street/Cliff Street area at paragraphs 3.70-3.71, including the longer term option of a winter garden in this area. The Publication Document strengthens the provisions that were in the Second Preferred Options Draft, and that strengthened the provisions that were in the first Preferred Options Draft. The SPD sets out detailed guidance in its Chapter 8.

The AAP therefore goes some considerable way towards the Town Council's wishes, taking into account the very great importance of the new Town Square at Bridge Street / Queen Street to the appeal of the Burlington Parade and Harbour Top developments and their very significant contribution to the much-needed regeneration of the Harbour. The Council would indeed like to see the Seafront strengthened as a high quality, year round, destination for residents and visitors alike; and the AAP puts in train the policy changes needed for this to happen.

4. *Parking is critical to the life of the town. On-street parking provision in the shopping core has little effect on traffic flow; the AAP's aim is to remove parking from the shopping core during the summer; and the [Town Council's] proposed multi-storey car park on Hilderthorpe Road will attract day visitors and give them ready access to the town*

The Council agrees wholeheartedly with the Town Council that sufficient, well-located, convenient and safe parking is critical to the life of the town. That the Council agrees is exactly why the AAP includes very significant improvements on all these measures.

The Council refers the Town Council to the commentary on page 6 (point iv) of this note in respect of the reasons for promoting the removal of on-street parking from the shopping core. The reasons do not have *any* seasonal or summer time element. The intended beneficiaries are the traders located in the shopping streets and the pedestrians who use them (of all ages, levels of mobility and origins). The primary focus by far of the shopping centre should be Bridlington's residents and those of Bridlington's catchment; the AAP is heavily focused on improving the town centre's competitiveness in these markets, all year round, because the evidence shows that it is in these markets that the town centre is performing particularly poorly. The commentary on pages 3-5 of this note explains the evidence on the performance of the existing retail traders in the town centre.

As the commentary on on-street parking on page 6 of this note explains, the weight of evidence is in favour of removing vehicle intrusion on the principal shopping streets of the town centre, at least during shopping hours. The only caveat is that the evidence on the resulting increases in retail turnover relates to well-designed schemes – which is, of course, the Council's intention.

The proposals to remove on-street parking in the town centre will be consulted upon when the Council makes its Traffic Regulation Orders, and options consulted upon may include provision for vehicle parking on these streets outside shopping hours.

The demand for highway space by cars circulating around the shopping streets for a parking place *does* affect levels of traffic on the highways (it cannot but do this). To assert otherwise is not defensible on the evidence.

The AAP does not propose a multi-storey car park on the Hilderthorpe Road coach park; the Coach Park site is proposed for the redeveloped Tesco store, for which the AAP provides up to 700 parking spaces which must also be available to the town centre generally. The comments in response to the Town Council in respect of point 5 below explain why the Coach Park site is not suitable for a multi-storey car park.

The AAP proposes a multi-storey car park in conjunction with a unit shop scheme, which is close by the existing retail frontages on Prospect Street / Manor Street and a heavily used pedestrian route. Thus this car park – as will the AAP’s proposals for increasing the parking provision at the Palace Car Park site, to the rear of Manor Street and on the Harbour Top – will serve the existing retailers in the shopping core.

Day visitors are directed to the Park and Ride. The Publication Document AAP explains the purposes of the Park and Ride at paragraphs 2.20 and 3.85, and puts in place a policy (BridTC8.4) on pricing to ensure that long-stay visitors use the Park and Ride in preference to the short stay parking which is targeted on shoppers (who are intended mainly to be residents of the town and its catchment).

The existing car parks are now supported (as promised by the Publication Document AAP at page 28, point ix and paragraph 3.88) by variable message signs on the approach to town and in it, giving drivers information on the number of spaces available in the principal car parks. Variable message signing is a proven tool for reducing the demand for highway space by drivers searching for a car parking space.

The Council can therefore reassure the Town Council that the AAP does what the Town Council wishes; the Town Council will have an opportunity to comment on the Traffic Regulation Order required to remove the on-street shopping in the shopping streets when the Council makes it.

5. The Town Council considers that a better location for a multi-storey car park than the Palace Car Park is the Hilderthorpe Road Coach Park, given that the Palace Car Park is ‘restricted’ to 250 spaces. The Palace Car Park should instead be put to recreational use

The Coach Park site is too far from the core of the town centre to replace provision at Palace Car Park; and the Palace Car Park will have an altered ‘footprint’ so as to permit the development of Gypsy Race Park. Day visitors are directed to the new Park and Ride as the Council explains above, and cites the relevant parts of the AAP for the Town Council’s reference.

Moreover, the disposal of the Coach Park site will yield a valuable receipt which the Council will recycle for investment in the other infrastructure promoted by the AAP. Multi-storey car park development is costly, although well-designed decked car parks are far preferable to surface solutions to meeting town centre car parking needs. For the Council to forgo a land receipt for the Coach Park site and instead to spend scarce resources on a decked car park on that site would be bad management of the public sector’s finances.

The proposals for a multi-storey car park on the Palace Car Park site do not ‘restrict’ the number of public spaces to 250. The AAP cites 260 public spaces⁵ as the ‘order of magnitude’ sought (Publication Document AAP, paragraph 3.100 and Plan 3.10). The Council explains on page 17 of this note that as the technical work is done on the car park, it may prove feasible to increase the number of public spaces.

Part of the land that Palace Car Park occupies will become the Gypsy Race Park, so the Council can reassure the Town Council that the Palace Car Park site will indeed, in part, be put to recreational use.

Therefore, the Town Council is incorrect to suggest that the Council has failed to take into account the Town Council’s wishes for a recreational use on the Palace Car Park site.

6. New buildings should not be ‘contemporary’ but be in keeping with the character of the town’s historic architecture

The Council can once again reassure the Town Council that it wholeheartedly agrees that new buildings should be in keeping with the town’s historic character (as the AAP states at paragraphs 2.25-2.26, paragraph 3.65 point iv, paragraph 3.79 point vi, and paragraphs 4.53-4.54).

⁵ The new multi-storey car parks at Palace Car Park and the Harbour Top, and perhaps also (depending on the development mix) those south of Beck Hill and associated with the unit shop scheme, will contain parking spaces for business operators and residents.

The Publication Document AAP provides for high quality design throughout the AAP area in Policy BridTC11; and Policy BridTC12 goes still further for major schemes and requires that a proposal be accompanied by a 'development statement', one of the purposes of which is to ensure that only well-designed schemes that respect the town's historic character secure planning consent. The policies for Burlington Parade (BridTC3), the Marina (BridTC4), the Seafront (BridTC6) and the Strategic Public Realm (BridTC5) all require the design guidance set out in the SPD be observed.

Good contemporary design does not mean, however, that new buildings should be artificial replications of historic buildings (historic buildings were once new too!). For this reason – to ensure that new buildings in Bridlington are well-designed and in keeping with the town's historic character – the Council commissioned and consulted upon the design guidance that is set out in the AAP's Supplementary Planning Document (SPD). The Town Council was also represented at two special consultation sessions on the SPD at the Town Team meetings. The policies in the Publication Document AAP all require new development to observe the guidance in the SPD.

The AAP uses the word 'contemporary' in the context of the SPD's guidelines precisely in order to avoid the kind of confusion that the Town Council refers to. More detail on the SPD is provided on page 11 of this note in response to a similar comment made by the Council on the first Preferred Options Draft AAP. The Second Preferred Options Draft AAP was supported by the Supplementary Planning Document, and the policies in the Publication Document strengthen the provisions for high quality design and respect for Bridlington's historic character.

The Council has also designated (May 2009) the 'Bridlington Quay' conservation area in an effort to ensure in future that new development within the AAP's conservation area particularly is of the quality needed to enhance and protect the particular character of the designated area. The final version of the Supplementary Planning Document will bring it up to date with this more recent designation.

7. Global warming suggests that the Gypsy Race holding tanks will be inadequate

The Council reassured the Town Council on a similar point made by the Town Council on the second preferred options draft AAP (Report of Consultation, page 23), and is pleased to do so again. The Council is in active discussion with Yorkshire Water to ensure that the storm water capacity required for the proposals, in light of climate change, is adequate, and with the Environment Agency on the management proposals for Gypsy Race. Yorkshire Water is likely to replace the existing tanks with new provision, and the Environment Agency is content that the AAP puts in place the flood risk management provisions needed.

8. Leisure World should be replaced with an Olympic-sized swimming pool

The Council points out that the AAP makes no concrete proposals for Leisure World or its site. Policy BridTC6.1.a is drafted so as to allow this use. The Council will consult, as promised (paragraphs 1.34 and 3.77 of the AAP set this out), on the options for Leisure World. Should the evidence on likely usage justify an Olympic swimming pool, the money required to develop it available, and the evidence shows that this money would be better spent on an Olympic swimming pool rather than other alternatives for improving wellbeing in Bridlington, then the Town Council is reasonable in hoping that its wishes will be deliverable.

If the AAP were to promote an Olympic swimming pool on the Leisure World site – rather than defer a specific decision on the future use of the site to later consultation – the AAP's proposals would have had to meet all these tests. The evidence, however, on the pressing needs for Bridlington's regeneration shows that the major projects promoted by the AAP will be more effective, and offer better value for public money, in meeting these needs.

9. The Council's aim of building 600 housing units in Hilderthorpe Road is not justified by a government's house building requirements; the additional housing would negate the other measures to reduce congestion and slow house sales still further. A more realistic number should be sought

The Council is obliged, in preparing its development plan documents, to comply both with national and regional policy. The Council refers the Town Council to Planning Policy Statement 1 – Delivering Sustainable Development, Supplement to PPS1 – Planning for Climate Change, Planning Policy Statement 3 – Housing, and Planning Policy Guidance 13 – Transport. All of these promote the development of previously developed land ('brownfield') over alternatives to meet housing needs, where existing infrastructure can be used most efficiently, and where residents will be well served by a choice of transport modes other than the private car.

Planning Policy Statement 12 – Local Spatial Planning requires local planning authorities to comply with the relevant Regional Spatial Strategy (RSS); footnote number 3, page 9 of this note, explains further. The RSS designates Bridlington a principal town and sets a minimum of 65% of the housing requirement to be met on brownfield land, including to support regeneration and economic growth; and assigns the East Riding a housing delivery requirement of 1,150 *net* additional housing units every year to 2026.

The Council's emerging Core Strategy proposes, taking an East Riding-wide view, a preferred option that allocates 15% of the annual housing requirement to Bridlington; this equates to a *net* addition of about 170-175 housing units a year in Bridlington as a whole, or (say) a net gain of 2,380 housing units in total in Bridlington from 2012-2026. The share to be developed on brownfield land within Burlington Parade – not less than 500 and up to 600 (the number is a gross number, not net of the dwellings that will be replaced) – should be understood in this context.

Moreover, the housing in Burlington Parade is not all in Hilderthorpe Road, but in a mix of sites in the interior of the site, thereby regenerating otherwise despoiled back land with no other chance of regeneration, on the Harbour Top and along part of Hilderthorpe Road. The market targets for the housing include retirement provision, town houses and apartments - that will increase housing choice for Bridlington's existing residents, increase the appeal of Bridlington as a place to live for in-movers, appeal to sailors and other visitors, as well as to the growing Bridlington population of all ages and household types who would enjoy a town centre lifestyle.

The Council cannot accept that the AAP proposals are in any way other than in compliance with national, regional and emerging local policy. The Council is not clear why the Town Council believes there is a policy basis that the Council has ignored for thinking otherwise.

In respect of the effects on traffic congestion, the Council can reassure the Town Council that it has carried out, as it is obliged to do as part of the evidence for the AAP proposals, 'transport assessment' work and modelled the traffic effects of the proposed developments (all of them, including the additions to public parking proposed). With the various measures also proposed by the AAP (Policies BridTC5, BridTC7 and BridTC8), the evidence shows that the local highways network can accommodate the gains in activity proposed (and needed) for the regeneration of the AAP area. The Council also points out that residents within the AAP area are less likely to need to drive, or use public transport, to access the services of the town centre – and in many cases also to access jobs in the town centre. The trip-generation effects, therefore, of meeting the Council's housing requirements in Bridlington are lower for provision in the AAP than elsewhere in the town.

Thus provision in the town centre is more sustainable than other alternatives: provision is on brownfield land; existing infrastructure is used more efficiently; the proximity to shops and services provides existing traders with an easier-to-capture spending base; in-centre residents have a reduced need to use cars to access the town centre; in-centre residents provide the natural surveillance – all day, weekends, all year – that reduces the risk of anti-social behaviour; and in-centre residents gives the town centre a natural 'busyness', year-round, that makes it more appealing to everyone.

House sales do not slow because there is additional housing choice. Housing development is market-driven, subject to the Council's management of land supply in line with the obligations national and regional policy imposes. These are all matters of fact. The Council also refers the Town Council to the commentary on page 8 of this note. The Council cannot, therefore, justify amendments to the AAP to reduce the housing targets.

10. Rumours as to Asda and Tesco, and a preference for a multi-storey car park on the Coach Park site

Tesco is in a special position because of the AAP's strategy, and the Council is in necessarily confidential commercial negotiations. Asda is free to come up with an alternative approach that also meets the AAP's objectives, or to promote another location for a supermarket.

The Council explains the needs for ‘anchor’ retailers in the town centre on pages 4 and 5 of this note. The Council accepts that the introduction of new competition – though very necessary – in the town centre needs careful management to allow it to bed down; and the AAP provides measures to offset the impact with this in mind. The AAP proposes improvements in parking and public realm, including on the Seafront and at Prince Street / Cliff Street, in the established core; the very significant improvements entailed in the regenerating the Harbour Top and better integrating the Harbour with the town centre; and the creation of the new Town Square. The AAP’s proposals for new - more, better designed - parking are also sited to benefit existing traders; and the new shops are located on a heavily used street that links the new unit shop scheme to the established core (the distance along this heavily used street between the two is just 310 metres – a five minute walk at most, even for the less mobile). The Council also supports the increasing numbers of events and festivals which take place in and around the established shopping core, and that will continue to do so with the Council’s support. The Harbour Top regeneration is also designed to support the Spa, and will be implemented if needed in advance of the Marina.

The Council explains, in response to point 5 of the Town Council’s representation on the Publication Document AAP (pages 22-23 of this note) why the option of a multi-storey car park on the Coach Park site is sub-optimal as well as unnecessary in the context of the AAP’s other proposals.

11. Beck Hill should be left as it is

The upgrading of Beck Hill is necessary to permit access to an expanded and decked car park to the rear of Manor Street, and to provide a relief road to permit the down-grading of Springfield Avenue (to improve the pedestrian crossings and environment) and the part closure of Bridge Street. Its character will not be lost, although it will be affected. The benefits of upgrading Beck Hill to enable these changes far outweigh – on the evidence – the ‘costs’ of not leaving it as it is.

12. The railway station proposals should be deleted because Tesco is not going to move, and the proposals are in any case a waste of money

The Council is negotiating with Tesco, and has every expectation that Tesco will move. The Council – of course – entered discussions with Tesco before putting the proposals in the AAP. On the basis of Tesco’s willingness in principle to make the change, the AAP put forward the proposal following the options appraisal process. The railway station is an important gateway to the town centre and a listed building. The present circumstances do not rise to this status, and are a poor introduction for visitors to the town centre. The value to the regeneration strategy of the proposals is significant: the release of a site of the size and configuration needed to accommodate the scale of new anchor stores in the fashion sector particularly that Bridlington badly needs (and, also *on the evidence*, can support); the opportunity to dispose the Coach Park site for a significant sum that can be re-invested in much-needed public realm and parking infrastructure elsewhere to serve the town centre as a whole (making it far more attractive for residents and visitors to use); and the creation of a new public space that provides a fit setting for the listed railway station and gateway to a much improved town centre. The options analysis showed the Station Plaza – with its entrance to the new Tesco store, new unit shop scheme, route into the rest of the town centre and into the Gypsy Race park – to be the best option for tackling the causes of Bridlington’s underperformance, working within the capacity of the local economy to accommodate new development, attracting private investment and realising the value of the town centre’s distinctive assets.

The Council cannot therefore accept that these benefits to Bridlington’s regeneration can reasonably be described as a waste of money. The Town Council’s alternative of a multi-storey car park on the Coach Park site needs to be considered in the context of the evidenced benefits of the option promoted by the AAP.

13. A bus station and car park at Hilderthorpe Road Coach Park is needed, with the railway station, to provide a fully integrated transport system

The AAP provides for exactly this – although the bus station is sited along Station Approach, and the multi-storey car park will form part of the unit shop scheme with further parking as part of the Tesco development on the Coach Park site. The Publication Document AAP explains this on page 42, at Policy BridTC3.2.a and Policy BridTC7.2.f.

14. A national survey indicates that small shops are being displaced by national chain stores, town centres are becoming ghost towns and therefore there should be no new shops in Bridlington

The Council is, of course, up to date and well-informed on the research evidence on town centres and the impact of chain stores. The factors that explain the decline of (some) town centres are far more complex than the impact of chain stores; indeed, there is also a significant body of research that shows that, once well-located and designed schemes with new chain stores have been introduced (with the impact greatest in the first year, typically), existing small operators can benefit, and very often perform as well or better than they had before. The fact is that the existing complement of traders in the town centre is not, collectively, attracting enough custom into the town centre (the Council comments on page 3 of this note). There are many reasons for this – some of which have to do with the management of the businesses, their ability to raise finance for investment in their businesses and so on. Page 4 refers to the other reasons and directs the Town Council to the relevant parts of the AAP. The Town Council is also advised to read the retail evidence for the AAP – all of which is on the Bridlington Renaissance website. The bottom line, though, is that new retail floorspace has to form part of the answer to solving the reasons why the town centre very significantly underperforms its potential as a shopping centre. The New Economics Foundation (NEF) does not classify Bridlington as a ‘clone town’ in its 2005 report, but as England & Lyle point out in their 2009 Retail Study for the East Riding (see paragraph 3.41), Bridlington does not score well enough on standard vitality and viability measures to be rated as a successful Home Town (the NEF’s classification of towns that retain their distinctive character).

The Council is very concerned to protect the distinctive character that the town centre’s independent shops give it. The AAP builds in protections, and some are intrinsic to Bridlington itself. These protections are as follows:

- Bridlington’s character is partly protected by the very small average size of shop units which is – on market forces alone (as the AAP is at pains to explain) – very unlikely to change within the historic core of the town centre. Comparison units average just 166 sq m in the town centre (the 2006 Goad map shows that the town centre had 24,830 sq metres of comparison goods floorspace, divided amongst 149 separate shops). All shops together – including the much larger Iceland, Tesco and Somerfield units – produce an average store size of just 246 sq metres.
- The AAP proposes no more new floorspace than the robust, industry standard, evidence of what the town can support over the AAP planning period, with the forecasts taking into account the location of competing centres, recent consents in them for new floorspace and the effects on spending of the economic downturn and the belt-tightening on household spending that is the consequence. Overall, the unit shop scheme proposed by the AAP will increase the level of all retail floorspace in the town centre by just 15% (based on the 2006 GOAD map).
- The unit shop scheme proposed by the AAP will bring new kinds of trade to the town centre – with the target on fashion goods particularly. At present – even within the tightly built up area of Bridlington – the town centre retains just 31% of residents’ expenditure on fashion, and just 18% of residents’ expenditure from within its catchment as a whole.
- The AAP’s proposals for very significant improvements in the established core of the town centre, including the benefits for the town centre as a whole of the regeneration strategy’s delivery.

The Council would be very pleased to meet with the Town Council at any time to go over its concerns and the matters set out in this note. Meanwhile, the hope is very much that this letter has provided the reassurance needed.

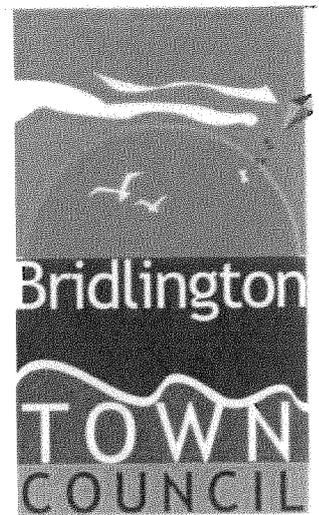
Yours sincerely,



John Lister
Head of Bridlington Renaissance

PK/SF

Mr John Lister
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10 March 2011

Dear Mr Lister

Re: Bridlington Town Centre Area Action Plan (AAP) – Submission Document from Bridlington Town Council

Thank you for your letter dated 16th February 2011 which prompted an Extraordinary Meeting of the Council on Wednesday 9th March 2011 to consider the contents.

The following resolution was made:

RESOLVED: *The Council resolved that after careful consideration of the previously submitted AAP response that they were quite happy for this document to go to the Inspector without amendment or deletion. A letter conveying the above will is to be forwarded to Mr Lister, Head of Bridlington Renaissance, at the East Riding of Yorkshire Council as soon as possible.*

I now trust that the submission of the Bridlington Town Council's AAP response will be dealt with as per the above resolution.

Yours sincerely

Councillor Shelagh Finlay
Mayor of
Bridlington Town Council



EAST RIDING

OF YORKSHIRE COUNCIL

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Alan Menzies Director of Planning and Economic Regeneration

Councillor G. Pickering
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Your Ref:
Our Ref:
Enquiries to: John Lister
E-Mail: john.lister@eastriding.gov.uk
Telephone: 01482 395040
Date: 17 February 2011

Dear Councillor Pickering,

Bridlington Town Centre Area Action Plan – Submission Document

Thank you for your representation on the Publication Document AAP which was received on 31 January 2011. The time you have taken to put your views in writing is appreciated. This letter, and the short report it introduces, is sent in response, with the aim of reassuring you on the points you make.

National planning policy (specifically, Planning Policy Statement 12 - PPS12) specifies that local development plan documents (which includes the Bridlington Town Centre AAP) promotes only the best performing options, all reasonable alternatives considered. PPS12 further specifies that the options promoted by a development plan document must be justified on the evidence and be deliverable. The evidence required is of two types: the objective evidence (facts, research findings, best practice etc) and the views of local communities and statutory agencies. Even where the objective evidence and the views of local communities do not align, PPS12 still requires that these competing positions be balanced. The tests of soundness, however, rest on justifying a plan's proposals on the evidence that they are the best alternative and will be capable of being delivered.

PPS12 also requires that the preparation of a development plan document be 'front-loaded' – meaning that the plan-making process must shape its preparation from the outset. The East Riding's Statement of Community Involvement (SCI) sets out the requirements. The SCI has been endorsed, as required by PPS12, by the Secretary of State. The East Riding's SCI can be found at www.eastriding.gov.uk/planning/ldf.

With these points in mind, the attached short report responds to the concerns you set out in your representation. The AAP is unavoidably a long document, and is supported by a large catalogue of specialist evidence on the issues the AAP deals with. My hope is that the short report attached, with the cross-references to the AAP and evidence base provided, will give you a more user-friendly account of the evidence and reasoning in support of the AAP's proposals.

Should you find it helpful, once you have read the attached report, I am very happy once again to convene a discussion session on the AAP with Bridlington's ward councillors. Should there be any reason to do so following this further session, I am content to propose changes to the Publication Document AAP and to include these proposed changes with the submission to the Secretary of State. The submission, which begins the formal examination of the AAP's soundness, is planned for about mid-March.

The concerns you raise have been grouped, for convenience, into seven matters, summarised as follows:

1. The Council has not followed the open, transparent and consultative process required of it. Instead, the AAP process has failed adequately to solicit your views as Ward Councillor and the views of other Ward Councillors and, when Ward Councillors have expressed their views, the AAP process has disregarded them; has involved officers 'talking round' consultees rather than providing them with a 'neutral' account of the AAP's proposals; and has involved 'misleading', 'aspirational', plans rather than 'accurate' ones. One consequence of the latter has been to delay objections, until late in the AAP process, from whose views will be affected by the proposals for the Harbour and Marina.



Nigel Pearson Solicitor Chief Executive



2. The Council's notices on the AAP consultation stages have not made clear that the proposals for Burlington Parade entail the assembly of the site for the Burlington Parade development, by compulsory purchase order if necessary. The consequence is that those whose properties may be affected have not been adequately notified and given the opportunity to object to the AAP should they wish to.
3. The AAP's proposals are not justified by up to date or accurate evidence on the retail, in particular the 'crash' effects on household spending of the recession and slow return to economic growth of the economy, the impact on Bridlington's trade draw of the consented Flemingate scheme in Beverley and published studies and publications, for example by CABE, which show that retail-led development is not beneficial.
4. The proposal for siting the additional retail floorspace is contrary to national policy ('guidance and advice') on planning for retail development in town centres. In particular, the proposed retail development is overly reliant on the 'supermarket shopping anchor at the coach park', and the need as a consequence to relocate the focus of the shopping centre to a location that is poorly linked, via a street that is active primarily for non-retail purposes, to the established shopping core.
5. The proposals do not take account of the adverse impacts of the proposals for additional retail development, stated as: the likely 'out of town' effect on the established shopping core of the town centre; the likely loss of existing national retailers from the established shopping core with a consequent decline in footfall and spending that other retailers depend upon and a reduction in rental income the local property owners who let space to them; the loss of tourism income where visitors to the Seafront are drawn to the town centre's retail offer; and 'lateral' impacts on the areas of Bridlington outside the AAP area (the boundary of which should include the whole town).
6. The AAP 'seeks deliberately to retract' the provision of hotels and guest houses in the AAP area with the aim of improving the financial viability of the Marina, with 'little or no' understanding of the 'cumulative' impact of the proposals, most particularly on the 'causal' link between the conversion of B&Bs and guest houses to housing use and the level of deprivation in Bridlington South.
7. The proposals for Gypsy Race are not justified: the Gypsy Race 'link' is not needed for economic regeneration as it does not link the new retail area to the established core; and it is not strategic enough to justify the demolition of Bridge Street because it does not terminate in the new retail area or town square but alongside the main road.

I hope you find the response to each of these matters helpful, and emphasise my willingness to discuss the responses further at a time to suit you

Yours sincerely,



John Lister
Head of Bridlington Renaissance

Enc: Short Report - written response to Councillor Pickering's 31.1.11 representation on the Publication Document Bridlington Town Centre AAP.

Cc: Councillor R. Allerston
Councillor R. Burton
Councillor R. Harrap
Councillor C. Matthews
Councillor J. Wilkinson
Councillor C. Chadwick
Councillor M. Chadwick

Bridlington Town Centre Area Action Plan – Publication Document

Response to the 31.1.11 Representation by Ward Councillor Pickering

17 February 2011

INTRODUCTION

This short report has been prepared as a response to the points made by Councillor Pickering on the Publication Document AAP in his representation of 31 January 2011. The report provides a short account of the evidence and reasoning in respect of the matters that cause Councillor Pickering the concerns he sets out. The aim is to reassure Councillor Pickering on each of these.

The report is set out in two parts.

- Part One sets out the context for the AAP's examination: the AAP's purposes, which are set for Area Action Plans by national planning policy; the 'tests of soundness' on which the AAP will be examined for government by an independent planning Inspector; the advice received from a senior inspector who considered the Second Preferred Options AAP and which the Council observed in preparing the Publication Document AAP; and the outcome of a recent appeal case in Bridlington which was determined in part on the AAP's evidence on the tourist accommodation market in the AAP area.
- Part Two sets out a written reply to each of the concerns set out in Councillor Pickering's 31 January 2011 representation on the Publication Document AAP.

PART ONE:

The Context for the AAP's Examination in Respect of Councillor Pickering's Concerns on the AAP

The Purposes of an Area Action Plan as Specified by National Planning Policy

Planning Policy Statement 12-Local Spatial Planning (PPS12) governs the preparation of all parts of the Council's Local Development Framework. PPS 12 advises local planning authorities that an Area Action Plan (AAP) should be prepared where 'significant change' is needed (or expected) and to fulfil one or other of five purposes. Two of these five purposes apply to the reasons the Bridlington AAP was needed: 'to stimulate regeneration' and to 'focus the delivery of area based initiatives' (PPS12, paragraph 5.4). PPS12 (paragraph 5.6) goes on to advise on the value of AAPs as a device for producing a consensus on the right strategy for an area, for providing a catalyst for different agencies and landowners to work together and providing a for a compulsory purchase order where such action may be necessary.

Area Action Plans always focus on a specific area because of the purposes set for them under the 2004 Planning and Compulsory Purchase Act. Because AAPs are focused plans, the Council knows of no instance of an Area Action Plan covering an entire town of Bridlington's size. The implied aim of national policy, nonetheless, is that an AAP will benefit the wider area of which it is part or serves.

The AAP's Soundness – the Tests and the Council's Reassurance that the AAP Meets Them

As a general point, Councillor Pickering can be reassured that the Council considers the AAP's proposals to be sound on the tests set by government for development plan documents (The Cabinet 13/4/2010 minute 3878 and The Council 23/6/2010 minute 1775).

The Council is obliged to consider the AAP to be sound before it publishes the Publication Document for representations on its soundness. The 'soundness tests' require the AAP to satisfy the following criteria. The AAP will be examined on each of these by the appointed Inspector:

- The AAP must comply with national policy and the Council's emerging Core Strategy. The AAP provides a full account of the way in which it complies with both in Appendix 2.

- The AAP must comply with the Regional Spatial Strategy (RSS). It remains part of the local development plan until it is abolished by the Localism Bill. The timetable for the Bill's enactment is beyond the timetable for the AAP's examination. The official timetable is for enactment of the Bill before the end of 2011, although most experts consider this unlikely before Spring 2012. Meanwhile, the Council – unless and until directed otherwise - is to take account of the intended abolition of the RSS as a 'material consideration'.

The Publication Document is drafted on the basis that RSS had already been abolished, and thus the government's intention to abolish RSS has been given due weight.

However, for the AAP to be found sound by the Inspector who will examine the AAP, the Council will be required to set out 'proposed changes' to the AAP to reinstate references to, and its compliance with, RSS. The appointed Inspector will take these 'proposed changes' into account when examining the AAP.

Meanwhile, the Council is confident that the AAP's proposals are justified regardless of the RSS's policies – in part because of Bridlington's characteristics, in part because of its consistency with the Council's emerging Core Strategy and in part because of the AAP's consistency with national policy. Bridlington has a population of some 40,000, serves an *evidenced* catchment of a further some 40,000 with jobs and a wide range of services (including shopping), and is relatively isolated from any other settlement of significant size (being some 18 miles from Scarborough and some 19 miles from Beverley along on largely two-lane highways). These features make Bridlington a principal town, even without the RSS designation.

- The process of preparing the AAP must be 'front-loaded' – meaning that the process needs to have included full consultation at every stage, and the Council has to have taken into account at each stage the comments received at consultation. The Council is confident that it can demonstrate this, and will be setting out a full 'statement of consultation' that lists and provides the dates and outcome of every consultation event, every presentation to local groups (Civic Society, Town Improvement Forum, Town Team meetings, Bridlington Renaissance Partnership sessions, Members Briefings and so on) that considered the AAP at each stage. The Council is obliged to show that it has conformed to its government-approved 'Statement of Community Involvement' (SCI). The Council can show that the breadth and depth of community involvement on the Bridlington AAP has been far in excess of the Council's obligations under the SCI.

- The AAP's proposals must be justified by the evidence as the best options for achieving the agreed objectives (for improving the economic, social and environmental performance of the town centre and its environs, and the contribution to meeting the needs of the wider catchment it serves). The Council is confident that the evidence demonstrates that the AAP promotes the best options; and that this evidence in favour of each option is up to date and robust, and also takes fully into account the views expressed at every stage in the AAP's preparation by local communities, their representatives and statutory agencies.
- The AAP's proposals must be deliverable, flexible and capable of being monitored. The Council is confident that the evidence is in place to show that the AAP's proposals are deliverable, build in the flexibility needed (given the AAP's specific purposes), and that the proposals can be monitored, both for the progress towards their delivery and their effectiveness in achieving the outcomes in improved performance for Bridlington sought.

The Senior Inspector's View of the Second Preferred Options Draft AAP

The Publication Document AAP was informed by a 'front-loading' visit from a senior inspector (Mr R Punshon) from the Planning Inspectorate in February 2010; Mr Punshon considered the Second Preferred Options AAP, quickly reviewed the evidence base, and visited Bridlington to familiarise himself with the AAP area.

For the purposes of this report, the following points made by Mr Punshon are of particular significance (what the Council has done in response is set out in italics below each of these points).

- i. Although Mr Punshon found the Second Preferred Options Draft AAP to be 'very long', he also found its length 'very useful in that it fully explained the Council's decision making process and the route by which the preferred option had been arrived at'. Two parts of the Second Preferred Options Draft contributed significantly to its length (and Mr Punshon recognised these would be removed): the summary at the beginning of each of the chapters on the way the Council took into account the comments made on the first preferred options draft; and the comprehensive appendices on the AAP's evidence base (Appendix 1), the consultations to date (Appendix 2) and the options that had been rejected and the Council's reasons (Appendix 3).

The Publication Document AAP includes an updated version of Appendix 1 – the summary of the evidence base, but updated amongst other things to take into account the effects on the household spending forecasts (on retail goods) for Bridlington and its catchment of the recession and the economy's slow return to economic growth. Appendix 2 and 3 are no longer needed, so do not form part of the Publication Document AAP.

- ii. Mr Punshon considered as 'reasonable' the Council's approach to re-defining the boundary of the town centre's Primary Shopping Area (with some parts being taken out, and others added in) was 'reasonable'. Mr Punshon's comment referred both to: a) shrinking the boundary of the Primary Shopping Area (PSA) to remove the long (underperforming) secondary streets that lead away from the shopping core and the streets adjoining the Seafront; and b) the two alternatives within Burlington Parade for the PSA boundary, depending on Tesco's cooperation (one that includes the existing Tesco site if Tesco vacates it for the unit shop development, and relocates

and redevelops on the Coach Park site, and the alternative that excludes the existing Tesco site if Tesco does not move).

The Council is in negotiations with Tesco, and expects to conclude the deal promoted by the AAP. The Council will recycle the receipt for the disposal of the Coach Park site to support Bridlington's regeneration and the 1,900 jobs that the delivery of the AAP will create.

The vacated Tesco site (as explained by the Publication Document AAP) will, with the adjoining properties, create the site for the unit shop anchor development; and the Council will market this assembled site for this purpose.

- iii. In Mr Punshon's view, the retail evidence seemed 'relatively up to date'. Mr Punshon said that it would be wrong 'to base predictions on what could well be the bottom of the market', but also stated that there would be scope for a brief updating paper.

The Council prepared two such updates of the data that underpin the forecasts of Bridlington's capacity and need for additional retail floorspace in the town centre over the AAP plan period. Each used a slightly different approach, but the results of both updates are very similar. The two updates are England & Lyle, February 2010, for the East Riding as whole (<http://www.eastriding.gov.uk/corp-docs/forwardplanning/html/retail.html>) and Roger Tym & Partners, October 2010, for Bridlington only (www.bridlingtonrenaissance.com, AAP - 'Retail Capacity Update').

Langdon Hotel Appeal Decision: the Weight Given the AAP's Evidence

A recent planning appeal decision in Bridlington considered the case for preventing changes of use from holiday accommodation in the parts of the AAP area that fall within the area of designated by 'saved' policy Brid20 of the East Riding Borough Wide Local Plan. The saved Brid20 policy 'protects' holiday accommodation in the designated area from changes of use that would either harm the character of the street or create conflicts between the holiday accommodation uses and the new use that would be harmful to the amenity of that use. The Council reasoned that the concentration of holiday accommodation businesses was required because the businesses depended on 'passing trade', and that the pressure for other uses would mean a loss of needed holiday accommodation from the resort.

The Publication Document AAP drops this designation. The removal of the 'protection' policy is needed to allow the market to respond to the very substantial changes since the Local Plan was prepared. The effect of the designation is to distort the market and prevent businesses who not prospering to find other uses for their property. Thus, what had been beneficial in an earlier era, is now an unhelpful constraint on these businesses.

Bridlington's tourism economy needs every support available to grow. The evidence as to how to do this is unequivocal. Bridlington needs to become less dependent on the shrinking, low spend, long holiday, seasonal seaside tourism; and instead to attract more visitors out of season by gaining a bigger share of the higher spending, year round, growth markets. Bridlington needs to achieve this

while also retaining a healthy share of its traditional market, but even this has changed. Passing trade is far less important to most businesses than it had been before the growth of the internet; and more and more visitors expect to see their accommodation options on-line through the B&B websites, and to be able to book in advance. Thus concentration is far less of an issue. More and more visitors are also car borne.

The large number of clearly marginal holiday accommodation businesses is problematic for the town. Many buildings are down-at-heel and poorly maintained. Concentrations of such businesses both discourages new investment in these areas, and results in large parts of the central area being virtually deserted out of season. The businesses themselves get locked into a downward spiral which is unhelpful to the tourism trade (businesses that are not profitable cannot keep up the investment needed not just to maintain their properties but to keep up with the ever-rising expectations of the tourist market). The final blow is an artificial constraint imposed by the planning system which prevents market forces from working to the advantage of the people who own properties with accommodation businesses that can no longer earn their keep.

The Langdon Hotel appeal was a case in point.

The appeal was by the owners of Langdale Hotel, Pembroke Terrace, against the Council's refusal of planning consent for the conversion of the hotel into 14 flats. The Council refused the planning application on the grounds of the saved Brid20 policy: put simply, that the loss of the hotel use would be harmful to the holiday function of the street, and therefore was contrary to that policy.

The Inspector, however, allowed the appeal and granted planning consent. He made his decision on two grounds:

- i) he did not agree that the conversion of the Langdon Hotel to apartments would not alter the perception of the Pembroke Terrace area as a holiday location; and
- ii) the 'considerable weight' he gave to the evidence in support of the emerging AAP's proposals.

The Inspector considered the AAP's proposals to be supported by a 'very detailed and comprehensive evidence base' and, though the AAP had not yet been submitted, he gave 'some' weight to the AAP and its proposal not to carry forward the designation or policy from the Local Plan, coupled with the fact that this proposal, and the evidence for it, had been consulted on at the AAP's Issues & Options stage and at both preferred options stages.

The Inspector further observed that, 'The poor external appearance of some holiday premises in the locality has a damaging impact on the area and is testimony to the difficulties being experienced in this traditional sector of the tourism market; and supports the conclusions of the AAP in this respect'. He also concluded that the conversion of other holiday accommodation in the locality had had no significant impact on the general perception of the area as a holiday location, and acknowledge the likelihood that some of the flats would be likely to be used to some extent for holidays in any case (e.g., as holiday lets or even as second homes).

The Justification of the AAP's Proposals by the Evidence Base

The AAP's proposals, if the plan is to be found sound (making it possible, for example, to deliver the Marina), have to be defensible on the evidence for them; and the evidence has to show that the options it promotes are the best alternative option for achieving the objectives for regeneration that have been agreed.

The Council has invested heavily to ensure that the evidence needed to meet these tests is in place. The consequence is that the evidence base for the AAP is comprehensive and robust – and is up to date. In some instances, the Council has had to commission East Riding-wide evidence for the Core Strategy; and that work has had to review the evidence specifically for the AAP. In every case, the East Riding-wide evidence has been able to do so.

In every case, the methodologies used for the AAP's evidence base, as for the Core Strategy evidence base, are the industry standard methodologies; and the work has been carried out by acknowledged experts in the respective areas whose work has been tested at, and stood up to, inquiry many times.

The focus of much of the evidence for Bridlington has been on three things:

- i. Identifying the reasons why Bridlington underperforms its potential (and, for example, has serious pockets of entrenched deprivation, particularly in the areas to the south of the town centre). The reason for this focus has been to ensure that the AAP's proposals tackle the root causes of Bridlington's underperformance, rather than changes that will simply plaster over the symptoms. If these causes are not addressed, the AAP's proposals will fail to lead to the enduring gains in wellbeing the town wants and its communities need.
- ii. Understanding the capacity of the local economy to grow – so that the AAP's planning targets (i.e., the housing numbers, volumes of additional retail floorspace, space for new small businesses, hotels and so on that the AAP plans for) will both:
 - be deliverable through market forces (i.e., so the market will take up and deliver the opportunities the AAP promotes); and
 - generate additional benefits for the town, rather than have adverse effects on existing businesses and households. The additional benefits are measurable in additional spending and jobs, as well as the physical legacy of new infrastructure capable of supporting further wealth generation still.
- iii. Identifying the assets and opportunities that have the best chance of helping to drive wealth generation and improved wellbeing, and also are distinctive to Bridlington's particular character and culture.

The data inputs to the evidence base – e.g., population characteristics and change, employment structure and change, the incidence and causes of deprivation, unemployment and economic engagement levels, household spending, local property values, tourism trends – have all been kept up to date.

The effects of the recession, the slow return to economic growth, the squeeze on household spending, the constraints on development finance and the shortage of mortgage finance have all been taken into account – as has the effect of all of these on current conditions in the AAP area. The evidence base documents are all on the Council’s website ([give link](#)); and the Publication Document includes a short summary on pages 13-15 and a longer summary in Appendix 1.

The Council has also, throughout, worked hard on ensuring that the AAP promotes proposals that are deliverable. This evidence is summarised in the Publication Document AAP at pages 107-166; and the commercially sensitive parts of the AAP’s delivery strategy have been reported to and agreed by Cabinet since 2007, and Cabinet has been kept up to date with annual reports since.

PART TWO: the Concerns Set out in the Representation

The concerns expressed in the representation are grouped into the eight matters below; the discussion that follows deals with each in turn.

Concern 1:

The Council has not consulted adequately on the AAP; the views of Ward Councillors have been disregarded; officers have not been ‘neutral’ in explaining the AAP’s proposals; and the plans are misleading.

The Consultation Record

The Council considers that it has consulted fully on the proposals; that all views have been taken into account; and that the options the AAP promotes reflect the appropriate balance between the wide range of views expressed and the objective evidence needed if the AAP is to satisfy the tests of soundness.

The length of the period over which the AAP has been prepared alone is testimony to the huge resource invested in consulting local people; and has been far in excess of the Council’s obligations under the Statement of Community involvement. Consultation began in the days of the Town Charter’s preparation with the Town Team – with its very large number of participants from the wider community and local businesses from 2002-3 through its completion and signing in 2005; through an Issues and Options stage in 2006 (which considered a much wider area than later settled on); a first preferred options draft in 2007 (which, following the advice of leading counsel, scaled back the AAP’s geography to focus on the areas of major change); a second preferred options draft in 2009; and finally over the 12 week period between 10 October 2010 and 10 January 2011 for representations on the Publication Document.

The commentary in Part One of this report explains where the consultation record can be found. The Council has also prepared an initial 'Regulation 31' statement on the consultation undertaken, and a very full account is in progress (this full statement will be submitted to the Secretary of State with the Publication Document AAP). The Regulation 31 statement is on the Council's website at ([give link](#)).

Ward Councillors were given the benefit of full consultations sessions at each stage of the AAP's preparation, with time for questions and answers. Ad hoc members update meetings were held in 2006 and 2007; and more formal, minuted sessions, on 29 November 2007; 10 September 2008; 3 December 2008; 9 January 2009; 27 April 2009; 27 May 2009; 30 September 2009; and 11 November 2009. In addition, there were three further ad hoc sessions with Ward Councillors that were not minuted on 4 March 2009, 8 July 2009 and 19 August 2009.

Officers have not been 'neutral'

Officers are obliged to exchange information with consultees, and explain the basis in evidence on the issues and in respect of the options. This exchange of information is not 'leading' save in the sense that the proposals in the first and second preferred options were put forward as 'preferred' because the weight of evidence and public opinion had been in their favour.

The plans are aspirational and therefore are misleading. Only recently did the residents in and near Pembroke Gardens understand that the Marina development would include housing and commercial development.

The proposals for the Marina have always included the likelihood of housing and commercial development. It is very likely that Pembroke Garden residents were unaware of this well before the Publication Document stage of the AAP. The West Street Area Residents Regeneration Group submitted comments formally to the first Preferred Options Draft in the autumn of 2007, the gist of which was to say that the residents were concerned that the proposals did not extend to their area. Since then, the Council has invested some £7 million in the Spa environs works which is within their area.

The West Street and Area Residents and Regeneration Association submitted an objection to the Publication Document AAP that the Council will respond in writing to. That representation includes, amongst others, a concern that development at the Harbour will block views from South Cliff garden.

The Town Council have always been aware, for example; and although they have objected to the fact that some views from some properties will be lost, the Council has explained in response that regeneration of the central area of Bridlington *requires* that its very special assets – the Spa, Harbour, the scope for a Marina – work as hard as possible for the regeneration of the whole town centre. There is no plausible alternative for creating the step change needed in the town's performance for all its residents. The loss of some views for some properties has to be understood in this context.

The Council has a heavy obligation on it to use public money to greatest advantage. In this case, it behoves the Council to capitalise on the value generated by the Marina to include some non-

operational development land. Housing and ancillary commercial uses will animate the Marina, provide needed natural surveillance and secure a contribution to its costs for the Council.

The area of reclaimed land proposed by the agreed layout for the Marina is little more than 10% of the land area proposed with the 2001-2002 marina proposal. It is inevitable that the Marina development will result in some loss of views from some existing properties. The value to the whole of Bridlington is simply too great from the Marina and Harbour investment to constrain its development so as to protect all of the present views for the small number of properties that will lose some part of their views.

The need for Bridlington's regeneration is acute. The evidence base for the AAP provides the basis for the sequence of investments, and the priorities between them, needed to reverse the town's decline. A much more competitive town centre – that functions competitively in serving the needs of the town's catchment – is the essential first step. Alongside that is the step change needed in the town's competitiveness as a tourist destination. This success also depends on a much more competitive town centre – but the first step is to make Bridlington attractive for the some 80,000 people it should serve (be their town centre of choice) for most shopping and related leisure and cultural uses. The Spa refurbishment serves the catchment market and attracts people from further afield; it has the potential – and the investment was justified on this basis – to attract many more visitors from further afield. The town's other great opportunity is the regeneration of the Harbour and the creation of the Marina.

All of this requires a sound AAP. When implemented the AAP's proposals will create 1,900 much-needed, year-round, permanent jobs for the town. No alternative package of *evidence-based, deliverable*, proposals for the AAP area offers anything like this number of new jobs for the local economy (let alone the very significant physical transformation entailed in creating them and the boost in additional trade for local small businesses). Moreover, while a significant proportion of the new jobs will require good levels of educational qualifications and skills, many others will be 'easy-entry', giving those who are less skilled and educated in the local workforce the additional local opportunities they very badly need for year round work.

Concern 2:

The consultation on the AAP has not made it clear that the Burlington Parade site will be assembled, using compulsory purchase powers if necessary.

The AAP has set out this possibility at every stage of the AAP's preparation; and the Council has received comments from affected property owners in the Burlington Parade 'area of search' on the likely compulsory purchase order (CPO) since the Issues and Options stage of the AAP in 2006 (the Report of Consultation on the Issues and Options stage sets these out; the document is available on the Bridlington Renaissance website. The Council has also sent letters out on the AAP at every consultation stage to all businesses and households within that 'area of search'; held exhibitions over several days at each stage of the AAP where officers have openly discussed the likelihood of the CPO; and officers, sometimes with support from their consultancy team, have presented, consulted on and debated the proposals, including the likelihood of a CPO, with a whole range of local bodies at each stage – including the Town Team, the Hotel and Guest House group and, with the Publication Document, also the recently formed West Street residents group, the Rotary Club, the Chamber of Trade and so on.

The Council has also already acquired some 40 properties by negotiation within the 'area of search' in response to approaches by affected property interests, and negotiations with others continue. The 40 properties include most of the owner-occupied houses in the Burlington Parade area.

Until the Council decides formally makes a compulsory purchase order – and makes the necessary decision on the red line boundary for the Order – it is not correct for the Council to make approach to affected interests.

Concern 3:

The AAP's proposals for the retail elements are not justified by up to date evidence that takes into account the effects of the recession on spending or of the consented Flemingate scheme in Beverley.

The retail evidence is up to date

The calculations that underpin the AAP's proposals for additional retail floorspace in the town centre have been updated, as this report explains on pages 6-7. The increase in VAT on 1 January 2011 to 20% is not reflected. The retail industry's view is that the effects will be marginal in respect of the forecasts of future spending potential over the plan period (and therefore will have no substantial effect on the forecasts of the town centre's capacity to accommodate further retail floorspace).

The proposals do not need to take into account the Flemingate consent

The figures do not need to take into account the Flemingate proposals; Bridlington's catchment does not overlap with Beverley's (although the evidence shows – despite the 19.4 miles that separates the towns – that Bridlington loses 3.8% of its catchment's retail spending to Beverley). Thus consents in Beverley have relatively little impact on Bridlington – save for the fact that as competing centres improve their offer (especially Scarborough, York and Hull), Bridlington stands to lose still more.

The facts on the need for further retail development in the town centre

The town centre very significantly 'underperforms' as a shopping centre. The retail evidence draws on the findings of a representative sample of households in Bridlington and its wider catchment. The methodology used is the standard for the industry, and is one of the principal sources of evidence used by retailers and developers in making decisions as to whether or not to invest in any individual location. The Council is required by national and regional policy to prepare and use this type of 'retail capacity and vitality and viability' evidence in drafting its local development plan documents. The other sources of evidence include interviews with existing traders, 'health and vitality' indicators (like trends in rental levels), and analyses of the reasons for a town centre's performance. The data inputs on household expenditure have been kept up to date, and reflect the impact of the recession and the slow return to economic growth.

Were Bridlington performing as it should, given its size and relative isolation from competing centres, the town centre would reasonably be expected to attract *at least half* of its catchment's comparison goods expenditure.

This is very far from the case. The retail evidence for Bridlington shows that comparison goods¹ retailers in the town centre together currently retain just 27% of the spending by the residents of Bridlington's immediate catchment on non-food 'comparison' goods.² Bridlington town centre's very low, 27%, share is despite the fact that Bridlington town centre has more shops and retail floorspace (212 shops, 35,340 sq m) than Beverley town centre (173 shops, 32,860 sq m) which attracts some two and half times more comparison trade than Bridlington. Beverley captures this significantly higher share even though Beverley is very close to Hull city centre (see page 65 of the England & Lyle retail study for the East Riding on the Bridlington Regeneration website).

It is, therefore, beyond dispute that the town centre's existing retail offer performs poorly. The fact that it does also undermines Bridlington's potential for developing a stronger, less seasonal, tourism economy. The beach offer compensates for the appeal of the town centre in the summer season – but clearly does not do so for the remaining eight months of the year. The Spa, though a great success in its own right, is also 'let down' by the poor performance of the town centre's retail offer.

Thus Bridlington must very significantly improve its performance as a shopping centre if it is *both* to serve its resident and catchment population better and to support the growth of higher spending, year round, tourism in Bridlington.

The work for the AAP involved a great deal of study and analysis to try to understand why the town centre's existing shopping offer is not more competitive. The Publication Document AAP (October 2010) explains the 'causes' of the town centre's underperformance more fully at paragraphs 1.13, and paragraphs 4.70-4.71.

Key reasons include:

- the very large extent of the shopping centre (most especially the very long secondary streets that lead into the core of the town centre), the effect of which is to spread too little spending and footfall over too large an area for individual shops to prosper;
- the predominance of very small retail units that make it difficult for enough traders to offer a range of goods and a comfortable shopping experience for enough shoppers to draw more people into the town centre (and more often, throughout the year);
- the costs and other deterrents to private investors entailed in assembling a site big enough to create space for larger units;

¹ 'Comparison goods' is the technical name for most non-food goods – like shoes and clothing, household goods, electrical goods and so on. The word comparison is used because people tend to 'compare' prices of these items before buying.

² The evidence on retention is in RTP's 2006 retail study and the 2010 update on the Bridlington Regeneration website. Bridlington's resident population totals about 40,000; the resident population of the catchment the town centre should serve as the 'shopping centre of choice' also totals about 40,000; and, therefore, Bridlington town centre should be competitive in attracting about half or more of this expenditure on comparison goods. Visitor spending is additional to this potential.

- the low rents and property values, which make it hard to make a decent return on any investment in creating new retail units (the low property values are also a consequence of the town centre's problems, but are a deterrent to further investment too);
- the adverse impact on the quality of the shopping environment caused by traffic circulation, on-street parking and the seasonal activities;
- shortcomings in the quality, location and sufficiency of parking and in the quality of some of the public realm; and
- the management of many of the small shops that gets in the way of their ability either to offer year-round customers what they want to buy or to provide the kind of shopping experience that will induce shoppers to choose Bridlington town centre over other alternatives for their shopping money.

If the town centre is to improve its performance – year round – it will have to capture a much higher share of the catchment's expenditure on comparison goods particularly (and fashion good especially). To do so, the changes to be introduced need *both* to tackle the causes of the town centre's underperformance *and* capture its particular opportunities.

Because the range and types of goods in the town centre's existing shops play a big part in the town centre's underperformance, new retail floorspace is required that will bring in more shoppers to the town centre. This need cannot, in any evidenced way, be disputed.

The up to date retail evidence shows that if the town centre is to trade closer to the level it should, then some 13,370 sq m (gross) of additional retail floorspace for the sale of comparison goods is needed by 2016; and a further 5,340 sq m (gross) by 2021.

The additional retail floorspace needs to attract the kinds of retailers that are capable of attracting new, additional, customers to the town centre and encourage others who sometimes shop in Bridlington to come much more often. To attract the new retailers that will do this, particularly in the sectors (like fashion) in which the town centre is especially weak, new retail units need to be the size and shape that will appeal to them.

It is not feasible or deliverable to meet the need for these units on an incremental 'store by store' basis. The development industry rarely works in this way, and will certainly not do so to deliver the scale of new retail provision needed to achieve the fundamental reversal required in the town centre's trading position.

The only feasible and deliverable means of attracting a significant number of new retailers into the town centre is to provide a concentration of new unit shops in a good quality trading environment that can also build on the existing core of the shopping centre.

Therefore, there is no alternative other than introducing new, additional, shops that are strong enough to attract more customers into the town centre; and by bringing in more customers to the town centre, giving the existing traders a chance to compete for these customers too. The evidence is indisputable: without a significant influx of new retailers, the town centre will decline still further

as other centres – all some distance from Bridlington – continue to grow and improve and take a higher share still of the shopping expenditure from Bridlington and its catchment.

Concern 4:

The AAP's proposal for siting the additional retail floorspace is contrary to national policy; is overly reliant on a supermarket anchor; and the connection between the new development and the established shopping core is not via a shopping street.

National policy

The relevant national policy – with which the AAP *must* comply – is set out in Planning Policy Statement 4- Planning for Sustainable Economic Growth (published December 2009, which replaced Planning Policy 6 – Planning for Town Centres). PPS4 provides detailed guidance on introducing new floorspace (where justified – as in Bridlington's case by the evidence on retail capacity) in Policies EC3 and EC5. EC3 requires planning authorities to ensure that extensions to existing centres are carefully integrated in terms of design, including the need to allow easy pedestrian access; and EC5 directs planning authorities to identify sites are capable of accommodating the identified need and are suitable, available and viable for the designated purpose.

The AAP satisfies the PPS4 guidance for designating the site for the proposed anchor unit shop scheme; and the site allocated by the AAP reflects the evidence of what is needed to attract to Bridlington the comparison goods retail representation it needs, in the fashion sector particularly.

The CABE guidance is on the design of supermarkets in town centres. It counsels that in order to accommodate supermarkets in town centres (as the AAP proposes), they should be well-designed so that they can fit sympathetically within the character of the host town. The AAP's Supplementary Planning Document shows how the Tesco redevelopment should be designed to be attractive on the coach park site and provide a fit setting for the listed railway station building.

The anchor is the unit shop scheme

The site of the existing Tesco store (plus land and property on its boundaries) is allocated for the anchor unit shop scheme because it is not feasible to create a site that will meet the identified needs in the town centre on land immediately adjacent to the established shopping core. If this were a possibility, the AAP would have pursued it. The next best – and very good – option was to create a site as close to the existing shopping core as possible, and at the same time to ensure that the new location is on an already established pedestrian route. The AAP does this.

The distance between the 'entrance' to the designated unit shop site – which is laid out to continue the newly defined 'primary retail circuit' - and the top of Chapel Street is just 310 metres. The 310 metres is equivalent at the very most to a five minute walk, even for people whose mobility is impaired (for many it will be no more than a three minute walk). The shop units along the 310 metre stretch between Quay Road/Prospect Street/Manor Street and the top of Chapel Street contains a mix of uses very like the rest of the shopping centre – but has the additional benefit of the post office. The existing pedestrian flow *is a strong pedestrian flow* – regardless of the precise purposes of every pedestrian; the entire point of a town centre location is to enable 'linked trips' (shopping combined with trips to the post office, shopping at lunch times etc).

The entrance to Palace Car Park is also mid-way along the route, and Palace Car Park is a very well used shoppers' car park.

The strategic public realm proposals (Policy BridTC5) provide for widening the pedestrian pavement and for new landscaping, lighting and street furniture along it.

Thus, the unit shop scheme, which is to be designed as specified by the AAP's Supplementary Planning Document, is not an 'out of centre scheme' in concept or location. Unlike many of Bridlington town centre's existing shopping streets, the 310 metre link between the existing shopping core and the designated site for the unit shop anchor is a heavily used pedestrian route.

Amongst the other characteristics in favour of the site is its proximity to the railway station – and the opportunity that the AAP takes as a consequence to create a new bus-rail transport interchange.

Concern 5:

The proposals do not take into account the effects of the 'out of town'-style development: on existing retailers; on national retailers who are likely to leave and on the loss of tourism income from the change in the boundary of the Primary Shopping Area away from Cliff Street / Prince Street; and on areas outside the AAP area.

Impact of 'out of town'-type development

The response to Concern 4 aims to reassure that the AAP's proposals are not for out of town shopping, not in concept, location or in any other respect.

The effects on existing retailers in the established shopping core

The evidence for the AAP shows that two things are essential to ensure the introduction of the new shops into Bridlington town centre will work to the advantage of existing traders, and therefore to the advantage of the town centre as a whole: first, the new retailing needs to be a natural extension to the existing shopping core and easily accessed from it; and, second, the existing shopping core needs improvements at the same time that will improve the trading conditions in that part of the town centre too.

The AAP, for this reason, contains measures that *both* introduce new retail shops in a location that is close to the existing core and easily integrated with it, and very significantly improve the shopping environment of the existing shopping area.

The latter measures include: two new, well-designed, decked car parks that are conveniently located to the established shopping area (a redeveloped Palace Car Park, linked to the new Gypsy Race Park, with the decked arrangement making it possible both provide more parking *and* the new park; and a new decked car park to the south of Beck Hill to the rear of Manor Street); the widening and landscaping of Quay Road/Prospect Street/Manor Street; significant public realm improvements in the established core and Seafront; and the regeneration of the Harbour with its greater integration with the town centre.

The new policies for the Seafront, in turn, will make it difficult for future developments to secure planning consent for uses that have a seasonal market only (reducing the adverse effects of the seasonal activities, in and out of season, on the shopping core); and also encourage changes of use to the kinds of activities and housing that will animate the area and make it appealing all year round (complementing the shopping core).

The AAP (with its focus on the use of land) cannot do anything particularly to improve the management of the small independent traders – but it can improve their trading conditions. The existing traders should – in this renewed environment – find it much easier to compete for the expenditure of the increased numbers of shoppers they will have access to all year round.

These changes – coupled with the investment in the Spa and Harbour (with its new hotel) – will also make the town centre more attractive to visitors for a longer part of the year. The limited appeal of the town centre at present is one of the factors that explain why it has proved so difficult to widen Bridlington’s visitor season and diversify its visitor market.

The seasonal tourism activity and its impact on the year round activity of the shopping core

The effects on Bridlington town centre of the seasonal visitors are problematic – but the vitality of the town centre requires that it works both for residents and for visitors. The added traffic, congestion and general crowds during the summer season discourage local users from using the town centre in the summer and as a result locals tend to use the town centre less than is desirable the rest of the year too; and many of the small retailers appear to target seasonal visitors at the expense of their year round custom. Largely for this reason, two of the least successful shopping streets in the town centre are Cliff Street and Prince Street – the streets that join the Seafront to the rest of the town centre – despite the presence of Marks & Spencer (and Woolworths, before the business failed nationally and closed in every centre). Every bit of the evidence shows that the year round activities of the town centre need to be supported with fewer adverse effects from the seasonal activities.

The AAP’s response (as part of the package of changes needed to tackle the evidenced causes of the town centre’s underperformance) is to re-draw the boundary of the primary shopping area so that it does not overlap so greatly with the Seafront; and to encourage in this area and on the Seafront changes of use and new development that will appeal all year round.

The effect on existing national retailers in the town centre

There is, however, no evidence at all to suggest that Marks & Spencer or any other national retailer will move from Bridlington as a consequence of this change. Indeed, the very significant improvements in the trading environment and appeal of the shopping centre will make it far more likely that existing retailers will stay and, if anything, expand.

Impact on areas outside the AAP area

National policy directs development for town centre uses to designated town centres; and therefore the priority is to ensure the vitality and viability of the presently severely underperforming town centre. There is no evidence to suggest that the regeneration of the town centre will be other than beneficial to all of Bridlington. Indeed, the entire purpose of the AAP is to provide the policy basis for delivering an effective strategy that will create 1,900 jobs for the town's residents, and leave behind a physical legacy that will enable the town, by harnessing market forces, to have a much more prosperous future.

Concern 6:

The AAP's 'deliberate' retraction of hotels and guest houses is harmful, and is merely an effort to promote the development of a hotel to support the Spa.

This report explains on page 4 that the AAP simply removes the protection from changes of use from B&B and guest house uses to residential use that had been provided for the large area around the town centre by the adopted Local Plan. That approach to supporting the town's accommodation market is not supported by up to date evidence on the means of enabling Bridlington to develop a more competitive, less seasonal, tourism economy. There is nothing in the AAP that prevents existing businesses from continuing. Indeed, the AAP aims to encourage the growth of the tourism market for the town.

Concern 7:

The proposals for Gypsy Race are not justified, and are not strategic enough to merit the 'demolition' of Bridge Street

The opening up of Gypsy Race between the Coach Park site and the Harbour Top, with the park and pedestrian avenue and cycle lane alongside it, is one of the principal unifying features and value-drivers of the Burlington Parade scheme. The proposal takes advantage of a distinctive local assets – making the very most of it – and uses it to solve the significant problems of a large area of under-used, ineffectively used, and in parts semi-derelict 'back land' that lies between Hilderthorpe Road and Quay Road/Prospect Street/Manor Street.

In providing a device for solving this problem, the Gypsy Race scheme helps to create development opportunities (and generates the property values) that the evidence shows will attract the development industry to deliver the types and quality of schemes needed to regenerate this otherwise problematic area. That this is the case makes clear that the proposals are not in fact a waste of public money, but instead essential to the area's distinctive, 'true to Bridlington', regeneration.

The Council could not, therefore, justify the Town Council's wish to amend the AAP to attenuate the Gypsy Race scheme with what would be a 'dead end' at Bridge Street; the effect of the dead end would be to very seriously compromise the purposes of that scheme and the very significant value it has for the commercial deliverability of Burlington Parade.

The Gypsy Race feature is also hugely welcomed by the vast majority of the other consultees to the AAP. It is also signalled by the Town Charter, signed in 2005, by a very large number of Bridlington's community members and the representatives of the wide range of bodies that is activity in promoting the interests of the town.

WEST STREET AND SURROUNDING AREA REGENERATION GROUP

Tel: 07815913634

e-mail: wsarg@hotmail.co.uk

Chairman Barry Guildford
Vice chair Bob Hillary
Secretary Annie Knight
Treasurer Maggie Scott-Wright

Dear John Lister,

Thank you for your email of 10th January 2010 to which we make the following response:

The streets that are included within the West Street & Surrounding Area Regeneration Group's coverage are as follows:

West St / Richard St, Windsor Cres, Olinda Rd, St Hilda St, New Burlington Rd, Fairfield Rd, Clarence Av, Bedford Gr, Albert St, South St, Neptune St, Bow St, Pembroke Terrace, Thorpe Street and Palanza Ter.

Prior to our November meeting we carried out a leaflet drop to all of the properties within these streets to inform local residents of the meeting and invite them to come and express their views. We printed over 450 copies of the leaflet to achieve full coverage. These leaflets and the very existence of our group make it clear that we exist to 'represent' this area in these and other matters. Helena Moss, who had originally offered to have these leaflets posted out for us, had estimated a considerably greater number would be required. Although we clearly do not represent 450 diverse opinions we do actively 'campaign' on the behalf of our area and the residents within it.

The discussions at the meeting were wide ranging and extensive, however, obviously not all aspects of the A.A.P. could possibly have been covered in a single evening meeting.

The future of Leisure World was discussed at length and is represented in the appendix to the minutes; the question was originally broached by Carol Hillary.

The proposed retail development opposite the South Cliff Gardens, was added by our committee as it is of particular relevance to our immediate area and would affect many resident's views, which have been expressed to us

The issue of short term parking was also added by the WSSARG committee as a general observation.

Your response to our representation was discussed at our recent committee meeting. The committee was disappointed. It was felt that, having spent so much time and effort studying the council's proposals and discussing them with you and our local Councillors and preparing our response, that some 'consultation' might reasonably have been expected. Instead, all you

have done is question the validity of our response. The committee would like to ask if this is the way in which all contrary views to the AAP are being 'considered'?

Regards



Barry Guildford

for and on behalf of the WSSARG committee and group.



EAST RIDING

OF YORKSHIRE COUNCIL

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Alan Menzies Director of Planning and Economic Regeneration

Mr B. Guilford
West Street & Surrounding Area Regeneration Group

Your Ref:
Our Ref:
Enquiries to: John Lister
E-Mail: john.lister@eastriding.gov.uk
Telephone: 01482 395040
Date: 17 February 2011

Dear Mr Guilford,

Bridlington Town Centre Area Action Plan – Submission Document

East Riding of Yorkshire Council thanks you for your representation on the Publication Document on behalf of the West Street and Surrounding Area Regeneration Group (WSSARG).

The Council is, of course, concerned to read your representation on the Publication Document Area Action Plan, but thanks you for taking the time to submit these views on behalf of the WSSARG. I write in response for the Council with the hope of reassuring you and your members in respect of each of the points made in the representation.

I also extend the Council's offer to discuss these matters with you, and am sorry I was unable to take up the invitation to attend your 8 February meeting. I was able, however, to attend your meeting on 9 November 2010 where Councillor Chadwick and I were pleased to meet the some 15 members of WSSARG who attended and answer the questions put to us on the AAP.

The Representation and Matters of Concern

The discussion below responds to each of the eight specific concerns set out by WSSARG in its representation.

WSSARG also commented in the representation that their members believe that neither the Council's officers nor its Councillors take adequate notice of the views of Bridlington's residents, and cite the Pembroke Gardens development as a case in point. The letter concludes with a response on that point as well, again with an effort to reassure your members.

Concern 1:

The AAP repositions the shopping centre a half mile to the west of the present town centre. The larger stores in the town centre are likely to relocate, leaving the existing town centre to wither as has happened in many places throughout the country.

The AAP proposes to site a concentration of unit shops (up to 14,000 sq metres gross) for selling comparison goods (especially fashion) on a site presently part-occupied by the Tesco store. The AAP provides for the entrance to the unit shop scheme to be a few metres to the west of Springfield Avenue at the top of the Quay Road/Prospect Street/Manor Street 'link' between the unit shop extension to the shopping centre and the heart of the existing shopping area.

The Quay Road/Prospect Street/Manor Street 'link' between the two contains a mix of retail and service uses that is typical of the rest of Bridlington's existing shopping area; and is already a heavily used pedestrian route. The length of this 'link' – that is, the distance between the entrance to the AAP's designated unit shopping site and the top of Chapel Street – is just 310 metres (339 yards or .2 of a mile).



Nigel Pearson Solicitor Chief Executive



The 310 metres is equivalent to less than a five minute walk, even for people whose mobility is impaired (many comfortably walk a 310 metre distance in three minutes or less). The Palace Car Park is mid-way along the route, and is a popular shoppers' car park, further strengthening this route.

The AAP's proposes that the unit shop scheme be about 14,000 sq metres gross. There is, in the established shopping core about 50,350 sq metres of unit shop floorspace. Thus the increase of 14,000 sq metres equates to a gain of about 28% over existing unit shop provision.

Therefore, the extension of 14,000 sq metres is neither half a mile to the west of the shopping centre, nor does it reposition the shopping centre. The 14,000 sq metres extends the shopping centre and adds about 28% to the unit shop floor area.

It is, however, true that the introduction in a town centre of new (larger, better configured) retail units in a new and attractive trading environment *can* lead existing retailers to choose to relocate and expand into the new accommodation. The Council accepts that this may occur in Bridlington, but stresses that this kind of change can be beneficial (as well as a necessary, if painful in the short term, step towards making needed improvements in the performance of an established shopping centre).

While the Council has no evidence whatsoever that this will occur in Bridlington, the Council is aware of the benefits. The relocated retailer can offer a wider range of its goods, trade more efficiently, secure its existing customer base and attract still more shoppers into the town centre, the effect of which should be to give existing traders opportunities to compete for this additional trade. Moreover in many shopping centres – as in Bridlington – introducing new retail floorspace is the *only* effective means of improving the performance of an otherwise declining centre. Ultimately, centres decline because people choose to shop elsewhere. The fact that they do is explained by a complex interplay of problems; the AAP understands these and its proposals are designed to deal with them all.

The bottom line, though, is that not enough of Bridlington's residents choose to shop in the town centre. The town centre's comparison goods retailers¹ currently attract, together, just 27% of the spending on comparison goods by the residents of Bridlington's catchment (that is, the some 40,000 who live in Bridlington, plus the further 40,000 or so who live closer to Bridlington than to any other 'principal town', choose to spend just 27% of the money they spend on comparison goods in Bridlington town centre). A town centre of Bridlington's size and relative isolation should expect to attract closer to double this share.

There is, therefore, no getting around the fact that the existing shopping centre very seriously underperforms in meeting the comparison shopping needs of its residents. This underperformance also works against the growth and diversification of the town's tourism economy. While the seaside offer can compensate for the shortcomings of the town centre's retail offer during the summer season, it cannot do this the rest of the year.

Therefore, it is imperative that the regeneration strategy for Bridlington includes proposals for very significantly improving the appeal of town centre as a shopping destination – for the benefit of its resident catchment and for the growth of its visitor economy and the creation of a much less seasonal offer.

Were it feasible either to introduce the expanded offer incrementally, on a unit shop-by-unit shop basis, or to expand the shopping offer on a site immediately adjoining the Manor Street/Chapel Street/King Street area, the AAP would have pursued these options.

¹ 'Comparison goods' is the technical name for most non-food goods – like shoes and clothing, household goods, electrical goods and so on. The word comparison is used because people tend to 'compare' prices of these items before buying. Comparison goods retailing – particularly fashion retailing – drives the performance of town centres of Bridlington's size.

Incremental expansion, however, is not feasible commercially on the scale required to uplift the town centre, and there was no feasible expansion opportunity for any significant scale of development immediately adjoining the Manor Street/Chapel Street/King Street core. The next best – and very good alternative – is the unit shop site designated by the Publication Document AAP; and this, as explained above, is just 310 metres from the established core and linked to it by an established retail and service street that is already well-used by pedestrians.

The AAP takes into account – and provides for – the three critical measures the evidence shows is required to ensure that the introduction of new retail floorspace is beneficial to the established town centre:

- i. The scale of the new development needs to be in line with the evidenced capacity of the local economy to accommodate the additional retail floorspace.

This evidence is in place.

- ii. The additional floorspace to extend the town centre needs to be well-located for the established core in order to ensure that existing traders have the opportunity to attract the additional trade for the town centre that is generated.

The AAP does this by siting the unit shop scheme very close to the established core, and linked to it by a strong, established pedestrian flow along an existing shopping and service street.

- iii. Providing for improvements to the trading environment of the established shopping core.

The AAP does this by:

- *providing for two new, well-designed, decked car parks that are conveniently located to the established shopping area;*
- *providing for the widening and landscaping of the pavement along the Quay Road/Prospect Street/Manor Street to connect the new and established areas;*
- *promoting major improvements in the quality of the retail environment, including the creation of a new town square; and*
- *providing for the regeneration of the Harbour and its greater integration with the town centre.*

These changes – with the Spa, the Spa environs and Harbour (with the proposals for a new hotel) – will also make the town centre more attractive to visitors for a longer part of the year.

Concern 2:

The AAP removes the coach park, but does not provide an alternative.

The Council reassures the WSSARG members that there will be provision for alternative facilities for coach layover, and that coach drop-off and pick-up places will support the segment of the tourism market that is coach-dependent. The Council is fully aware of the importance of ensuring both; the AAP also integrates coach drop-off and pick-up facilities close to the bus/coach/rail interchange that will be delivered on Station Approach as part of the development of the unit shop scheme.

The AAP's proposal to dispose of the coach park site for a significant receipt provides the Council with valuable additional resources for investing in Bridlington's regeneration. The need to provide for alternative facilities for coaches is more than compensated by the benefits for the town of the Coach Park's sale.

Concern 3:

The AAP does not include a bus station adjacent to the railway station to integrate our public transport system.

The AAP does, in fact, make this provision. The WSSARG members are referred to the Publication Document AAP at: paragraphs 3.13; bullet iii on page 42; Policy BridTC3.2.a; and, in respect of the delivery timetable for the interchange, paragraph 6.13.

Concern 4:

The proposed shopping development in front of South Cliff Gardens will obliterate the views of the Harbour and bay that the gardens enjoy.

The regeneration of the Harbour Top and Harbour will result in the loss of some views from some positions. The views will be compensated by very significant improvements in other of the town centre's special assets – including the Harbour – and the added value these improvements will generate for Bridlington's economy and its long term prosperity. The Harbour is already a very important asset for Bridlington; there is, however, very considerable scope for improving its value to the town. Any option for the town's regeneration that does not take advantage of this potential will have missed a very important opportunity. Commercial development is needed because it not only increases and improves what is on offer in the town centre – shops, places to eat and drink, choice of places to live – but because it generates the resources needed to make the improvements required to the Harbour.

Some loss of views has to be considered in this context. The Council takes the view, supported by the evidence on what constitutes the 'art of the possible' in respect of Bridlington's regeneration, that some loss of views is the price to be paid.

To reduce the effects of this loss, however, the Council has prepared a Supplementary Planning Document to guide the design of buildings on the Harbour Top and Marina. This guidance ensures that views of the Harbour and bay will not be lost altogether at all; just from some positions. Very clearly, views of the bay are part of Bridlington's very special character and appeal.

Concern 5:

The AAP contains no indication of the future for Leisure World, the development of which will affect the development options for surrounding properties.

Paragraph 3.77 of the Publication Document AAP explains that the Council will consult on the options for the redevelopment of the Leisure World site should Leisure World in its present form cease. The AAP's Policy BridTC6.1 lists the range of uses that would be acceptable on the Seafront. Until the Council is in a position to consider Leisure World fully, it is not possible to be more precise.

Concern 6:

The AAP includes few concrete proposals that will regenerate the present town centre.

The AAP's evidence base points to the great importance, in using the Council's scarce resources as wisely as possible, by:

- Tackling the causes of the town centre's underperformance. Unless these factors are tackled, it will not be possible for other investment to add the value needed to Bridlington's competitiveness, which includes its appeal and success as a place to live as well as a service centre for its residents and a tourism destination for its visitor economy.

The biggest problem – essential to solve if the other problems are to be solved – is the town centre's inability to attract enough expenditure, year round, from its residents and its catchment, to support a competitive, well-maintained, shopping centre. There are many reasons why the shopping centre underperforms (please see, for example, paragraphs 4.7-4.71 of the Publication Document AAP).

The Spa and Spa Gardens also form part of the town centre. The Council invested very significant sums in the Spa's refurbishment, and it is a very great success, attracting many more people to Bridlington. The Spa Gardens constitute a further £7m in regeneration investment. The proposals for the Harbour Top will help to integrate the Spa still more with the established shopping core of the town centre, to the advantage of both; and the Marina will complete this integration.

While the Council might instead have focused on public realm works alone on the Seafront and shopping core, the evidence very strongly shows that though this investment is needed, it would not trigger the other changes required to tackle the causes of the town centre's underperformance or built on its important assets for diversifying and strengthening its economic base.

Overall, the AAP's proposals will create some 1,900 much-needed jobs in Bridlington, as well as endow it with the physical assets it requires to grow and prosper.

Concern 7:

All of the parking facilities are short term, whereas the town needs opportunities for people to stay longer.

The Council prices its parking to encourage long-stay parking users instead to consider alternative, more sustainable, forms of transport than private car use. The Council is obliged to do this by national and regional policy. Thus longer-stay parking use is not prevented, but is more costly. Limekiln car park in the north and South Shore Park and Ride also provide significant opportunities for accommodating long stay parking.

The AAP also provides for private parking in conjunction with the development proposals – for small business occupiers (in the offices and shop front units) and the housing. This provision is in addition to the public parking proposals in the AAP, with ratios for this private parking that are in line with commercial requirements and, where it applies, national and regional policy.

Concern 8:

Shopping areas should incorporate covered walkways to encourage all weather use.

The Council accepts that shelter is important, but feels it is inappropriate to specify this level of detail in the AAP. The WSSARG will have an opportunity to comment on individual proposals, including for public realm in the shopping areas, when planning applications are prepared and submitted.

Listening to residents' views

The Council considers that it has honoured fully its obligations to ensure that local people have been able to shape the Area Action Plan – from the work done by the Town Team on the Town Charter from 2002, through the completion and signing of the Town Charter in 2005, and throughout each stage of the AAP (Issues and Options in 2006, first Preferred Options Draft AAP in 2007, second Preferred Options Draft AAP in 2009 and Publication Document AAP in 2010).

An account of the consultation work through the Issues and Options stage is set out in the first Preferred Options Draft AAP in Appendix 1. The first Preferred Options draft also explains, at the beginning of each section, how views were accounted in the proposals. The second Preferred Options Draft AAP does the same, and also provides in its Appendix 2 a full and updated account of the consultation work. There is also, on the Bridlington Renaissance website a 'Regulation 31' statement on the consultations. The Council has also prepared, at each stage, a full report of consultation that sets out the comments made and the Council's response to them. These can all be found at www.bridlingtonrenaissance.com.

The Council appreciates that some residents may feel their views have been ignored where the AAP proposes an option which is not the one they in particular favoured. The Council is obliged, however, to take into account all views expressed. WSSARG will understand that the Council receives conflicting points of view on the same issues.

In addition, the Council is obliged to take full account of the AAP's 'evidence base' – the objective facts, research findings and expert analyses that the Council is required to collect to inform, and ultimately to justify, the AAP's proposals.

All of these considerations – the disparate views of residents and the views of statutory agencies expressed at each stage, the requirements of national and regional policy and the findings of the objective evidence base – come together to determine the choice of options that is set out in the Publication Document AAP. The Council is obliged, with all of this in mind, promote the options that perform best in improving the performance of Bridlington and enhancing the wellbeing of all its residents.

The Council can reassure WSSARG members that it listens very closely to what local residents says, and takes everyone's views fully into account.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Lister', written in a cursive style.

John Lister
Head of Bridlington Renaissance

Cc: Annie Knight
Peter Wilkes
Gail Miller
Mr & Mrs Hillary
Mr & Mrs White
Mr & Mrs Odey
Mr & Mrs Eaton
Margaret Scott-Wright

WEST STREET AND SURROUNDING AREA
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Chairman Barry Guildford
Vice chair Bob Hillary
Secretary Annie Knight
Treasurer Paul Bradbury

Dear Mr Lister

Thank you for your letter of 17th February responding to our representation on the AAP Publication Document.

Our Committee have studied your reply and discussed your response at our recent meetings.

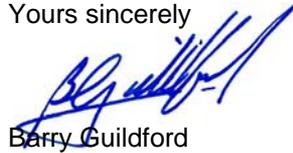
It is felt that your response is predominantly a reiteration of the information contained in the AAP documentation and the details that we have gathered from previous presentations and discussions. There is nothing in your response that would alter our opinions as expressed in our original representation.

In respect of the provision of an integrated transport hub located at the railway station, we were aware of the proposal to provide a few bus parking bays in the station approach road. We do not however believe that this constitutes a transport hub.

In respect to the retail development in front of South cliff Gardens, we strongly reject your view that the loss of views is a 'price worth paying'. Certainly not as in our opinion the retail units will simply add to the many already empty units within the Town Centre.

To summarise, we do not accept your responses and insist that our representation is put before the inspector in its original form.

Yours sincerely



Barry Guildford

Chairman WSSAAG

18 March 2011