

# Bridlington Town Centre Area Action Plan

## LD 20: Self-Assessment of Soundness

*(Note: the Assessment Cross-refers to the Examination Core Document numbers)*

Key question	Evidence provided
<b>Justified</b>	
<b>Participation</b>	
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>1. The consultation process allowed for the effective engagement of all interested parties. interested parties have been engaged formally and informally throughout the plan's preparation, from outset to submission, in a process which began in 2003 with the preparation of a Regeneration Strategy for Bridlington.</p> <p>Consultation has gone beyond both the minimum requirements set out in PPS12 and the regulations and complies with, and exceeds, the provisions of East Riding of Yorkshire's (EYRC's) Statement of Community Involvement (CD15).</p> <p>Documentation for the Examination:</p> <ul style="list-style-type: none"> <li>▪ The Statement Of Consultation-Regulation 30 (1)(d) summarises the activities which have taken place throughout the development of the plan (CD19).</li> <li>▪ Reports of Consultation have also been published during the process including:               <ul style="list-style-type: none"> <li>i) Report of Consultation on Bridlington Regeneration Strategy September 2004 (LD02);</li> <li>ii) Report of Consultations on Issues and Options AAP September 2007 (CD13);</li> <li>iii) Report of Consultations on Preferred Options AAP January 2008 (CD11);</li> <li>iv) Report of Consultations on Second Preferred Options AAP October 2010 (CD08).</li> </ul> </li> </ul> <p>The Council has also been in active negotiation with landowners and others who are directly affected by the AAP's proposals, and has made significant progress in assembling by agreement the site for Burlington Parade.</p>
<b>Research/ fact finding</b>	
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence?</p>	<p>2. The content of the AAP is justified by an extensive evidence base which forms part of the submission documents.</p> <p>3. In addition to early work undertaken in support of the Regeneration Strategy, there is an extensive and up to date evidence base to support the policies in the AAP. The evidence base reports are listed in full in CD01, Appendix 1, para 2 and include:</p>

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<p>4. How up to date and convincing is it?</p>	<ul style="list-style-type: none"> <li>▪ Bridlington Town Centre AAP Habitats Regulations Assessment: Stage 1 Screening March 2010 (Core Document SD01)</li> <li>▪ Bridlington Town Centre AAP Renewable Energy Appraisal 2009(Core Document SD02)</li> <li>▪ Bridlington Harbour Supply and Demand Study: Final Report June 2008(Core Document SD03)</li> <li>▪ Bridlington Harbour and Marina Development Hydrodynamic Modelling Study: Phase 1 report December 2009 (Core Document SD04)ADD</li> <li>▪ Bridlington Harbour and Marina Development Hydrodynamic Modelling Study: Phase 2 report December 2009 (Core Document SD05)</li> <li>▪ Bridlington Area Action Plan - Retail Study June 2006 (Core Document SD06)</li> <li>▪ Town Centres and Retail Study Vol. 1: Main Study Report February 2009 (Core Document SD07)</li> <li>▪ Update of Town Centres and Retail Study, 2010: supplementary report on need February 2010 (Core Document SD08)</li> <li>▪ Bridlington Town Centre: Retail Capacity Update September 2010 (Core Document SD09)</li> <li>▪ Transport Summary October 2007 (Core Document SD10)</li> <li>▪ A Strategy for Regenerating Bridlington 2004 (Updated 2007) (Core Document LD01)</li> <li>▪ East Riding of Yorkshire Second Local Transport Plan (LTP2) (LD03)</li> <li>▪ East Riding of Yorkshire Housing Needs and Market Assessment (LD04)</li> <li>▪ Bridlington Strategic Housing Land Availability Assessment September 2010 (LD05)</li> <li>▪ East Riding of Yorkshire Strategic Flood Risk Assessment Level 1 January 2010(LD06)</li> <li>▪ Our East Riding': East Riding Sustainable Community Plan 2006-2016, 2010 Refresh (LD08)</li> <li>▪ Bridlington Urban Renaissance Town Charter 2005 (LD09)</li> <li>▪ Affordable Housing Viability Study: Draft Summary Report March 2010 (LD10, LD10a, LD04a)</li> <li>▪ The East Riding of Yorkshire Employment Land Review July 2009 (LD11)</li> <li>▪ East Riding Tourism Accommodation Study February 2009 (LD12)</li> <li>▪ Bridlington Destination Benchmarking and Visitor Survey 2009 (LD13)</li> </ul> <p>4. The evidence base is comprehensive, robust and focused on the challenges, issues, assets and opportunities that are specific to the regeneration of the town centre.</p> <p>The evidence has also been kept up to date. The evidence has withstood scrutiny over the whole of the AAP's preparation period, and is convincing; a considerable level of 'soft market testing' of the AAP's proposals has been undertaken throughout (but not published because it is commercially sensitive), and the proposals remain appeal to the target developer and occupier markets.</p> <p>SD11 is an appeal case that placed considerable weight on the AAP's evidence for the removal</p>

Key question	Evidence provided
	<p>of the long-standing protection of designated 'holiday accommodation' areas in the AAP area. The Inspector who provided advice at preferred options stage found the AAP's strategy to be convincing (CD09); and the strategy is heavily driven by the evidence.</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>5. The principal assumptions are numbered below. Each has withstood the scrutiny of the public and experts over the period of the AAP's preparation. The SA/SEA and the communities' views found in favour of the preferred options compared to alternatives in response to the assumptions. The principal assumptions are:</p> <ul style="list-style-type: none"> <li>i. If the regeneration of the town centre is to be effective (i.e., that the AAP's proposals and policies are to lead to the outcomes sought), the AAP's strategy must be based on an understanding of why the town centre has underperformed its potential. LD01, Section 6 explains, and CD01, paras 1.8, 1.13-1.17 and 4.70-4.71 summarise; CD01, paras 1.10-1.12 summarise the research on seaside towns and best practice in town regeneration, drawing on the full account in LD01, Section 2).</li> <li>ii. The quanta of development proposed by the AAP must work within the evidenced capacity of the town centre to accommodate additional development in the target sectors, taking account of the market-based reasons for the town centre's decline and why, despite the most sustained property boom the UK economy has seen in recent decades, the town centre failed to attract any significant investment (CD01, para 1.8 sets out the assumption; CD01, paras 1.13-1.17 summarise the findings, drawing on LD01, Section 6, paras 6.3-6.7). The projected planning quanta and their sources are summarised in CD01, Appendix 1, paras 19-95.</li> </ul> <p>6. The assumptions are reasonable and justified based on the evidence, the communities' and commenting experts' views and, insofar as relevant, the findings at each stage of the SA/SEA (CD03).</p>
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions</p>	<p>7. It can be shown that the AAP's proposals are the most appropriate given the reasonable alternatives. A full account is provided in:</p> <ul style="list-style-type: none"> <li>▪ CD19 sets out the part played by the community at each stage;</li> <li>▪ CD12 and CD11, first and second Preferred Options AAPs set out at the beginning of each section what the communities' views were and how the AAP responded;</li> <li>▪ CD03 (final report of the SA/SEA) Sections 8-11 set out the decision process that led to and shaped the AAP's proposals from the options stage; CD04 Appendix J (appendices to the SA/SEA report) sets out a full account.</li> </ul> <p>8. The alternatives considered were comprehensive of the reasonable alternatives taking into account the evidence and the AAP's purposes and objectives. The reasonable alternatives are in</p>

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<p>between competing alternatives is it clear how and why these decisions were made?</p>	<p>line with the definition in the SEA Directive 2001/42/EC, Article 5(1)</p> <p>9. Decisions on preferred options are clear in the final report of the SA/SEA.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>10. CD04 Appendix J (to the final report of the SA/SEA) shows how the different options perform, and makes clear that sustainability considerations informed the choice of options and shaped them the preferred options through the two Preferred Options stages and the publication AAP. CD01, Appendix 3 provides a non-technical summary.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>11. The AAP explains its compliance with RSS, which was 'reinstated' as part of the development plan after the publication AAP was published. CD18.1 proposes minor changes, including to Appendix 2 which sets out an account of the AAP's conformity.</p> <p>12. The AAP expands on RSS policies YH5, C1, E3, E4 and E6 (the role and economy of Bridlington as a principal town, including in respect of realising the value of heritage assets and developing sustainable tourism).</p>

Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>13. The Issues and Options stage of the AAP identified clearly the issues (CD14), and introduced the issues with a clear account of the evidence from which they are drawn.</p> <p>The AAP also includes:</p> <ul style="list-style-type: none"> <li>▪ an Executive Summary to provide a brief overview of the issues, objectives, vision and proposals for tackling the issues, delivering the objectives and achieving the vision;</li> <li>▪ Section 2 summarises the strategy, and elevates it in policy (BridTC1).</li> </ul> <p>14. The strategy's priorities are clear, the reasons for them are fully set out and elevated in policy (BridTC2).</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>15. The adjoining authorities have been consulted at every stage. None has commented.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>16. The AAP sets six Strategic Objectives, and 14 Enabling Objectives. The objectives tackle the reasons for the town centre's underperformance, take advantage of its distinctive assets, seize its opportunities and work within the evidenced capacity of the local economy to accommodate additional development in the principal town centre uses and high density housing.</p> <p>The objectives are framed so as to achieve the outcomes the plan seeks and achieve the communities' vision.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>17. The objectives are specific to the purposes of the plan – the regeneration of the town centre and the achievement of the communities' vision for it.</p> <p>18. There is a very clear and direct relationship between the issues and the objectives (the objectives are a direct response to the evidence on why the town centre underperforms and what must change to reverse its decline, its assets and opportunities, how much demand the economy is capable of generating for new development and the aspirations of Bridlington's communities.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in</p>	<p>19 It is very clear how the policies will meet the objectives. The written justification for each policy sets out the objectives each is to achieve, and these are tied to the purposes for the policy.</p> <p>All of the policies relate to the AAP's purposes: to remove the market failures and make the</p>

the policies, with regard to the objectives of the development plan document?

changes needed to how the town works so that it can compete effectively for the catchment's expenditure and meet its needs for town centre services, and restore the town centre's value to the wider local economy.

The objectives are achievable through the policies:

- Strategic Objective 1 is delivered through the overarching strategy (BridTC1), the clear statement of the strategy's priorities (BridTC2) and the AAP's major projects (BridTC3-BridTC8), supported by the development management policies (BridTC9-BridTC18) and delivery policies (BridTC19, BridTC20).
- Strategic Objective 2 is delivered by BridTC4 together with the Harbour Top element of BridTC3 and the relevant parts (new Town Square) of the Strategic Public Realm (BridTC5), supported by the development management and delivery policies.
- Strategic Objective 3 is delivered by BridTC3 and BridTC15, supported by the development management and delivery policies.
- Strategic Objective 4 is delivered by BridTC7 and BridTC8, supported by the development management and delivery policies.
- Strategic Objective 5 is delivered by BridTC5, supported by the development management and delivery policies, and in particular BridTC20.
- Strategic Objective 6 is delivered by the overarching strategy (BridTC1), the policies for the major projects (BridTC3-BridTC8) and the development management policies, particularly BridTC11, and by the delivery policies.
- Enabling Objectives i, ii, iv, v, vii and viii are delivered by BridTC3 and BridTC5, with contributions from BridTC4 and BridTC11.
- Enabling Objectives iii, vi, viii and xii are delivered by BridTC4.
- BridTC3 and BridTC4, supported by BridTC19 and the overarching strategy (BridTC1), are the principal means of delivering Enabling Objectives x, xi, xii and xiv.

The AAP explains at paras 2.29-2.33 the relationship of the strategic objectives to the AAP's regeneration strategy.

20 The Council considers there to be no gaps in the policies given the plan's purposes.

21. Are there realistic timescales

21. The AAP sets out the timescales for delivering the objectives through the developments that make

<p>related to the objectives?</p>	<p>up the AAP's strategy in Section 6, paras 6.17-6.19 and in Table 6.1.</p> <p>The Council considers the timescales to be realistic, taking into account:</p> <ul style="list-style-type: none"> <li>▪ the progress with the negotiations with the principal delivery partners</li> <li>▪ the likely timescale for making and securing confirmation of the orders required to deliver Burlington Parade and the Marina</li> <li>▪ the evidence on the market and its appetite for taking up the development opportunities.</li> </ul> <p>The AAP has the full support of the statutory agencies, all of the Conservative ward councillors (6 of the 8), Bridlington's Town Team, the Chamber, the Civic Trust and the majority of the local communities.</p> <p>The Reports of Consultation make this clear (CD13, CD08, CD11).</p>
<p>22. Are the policies internally consistent?</p>	<p>22. The policies are internally consistent:</p> <ul style="list-style-type: none"> <li>▪ BridTC1 elevates the strategy in policy, and BridTC2 states its priorities clearly and elevates them in policy. Their weight in S38(6) terms is critical to guiding developers and investors, and making planning decisions. They work as companions with BridTC9 and BridTC10. The AAP is a plan for delivering a very specific regeneration strategy. BridTC1, BridTC2, BridTC9 and BridTC10 provide the basis in policy for guiding proposals that the AAP has not foreseen but which will have a bearing on the delivery of the strategy.</li> <li>▪ BridTC3-BridTC8 provide for each of the principal parts of the regeneration strategy – and together comprise an inter-locking and mutually reinforcing set of projects, each adding value to and making the delivery of the other possible.</li> <li>▪ BridTC9-BridTC10 work together. BridTC9 makes provision for a sequential approach for the siting major development to deliver, or cause no risk to, the regeneration strategy, and BridTC10 provides for an impact assessment where a major development is proposed that is not foreseen by the strategy and is not compliant with BridTC9. BridTC1 and BridTC2 provide a platform for the purposes of BridTC9 and BridTC10, and provide the policy framework for the assessment required by BridTC10.</li> <li>▪ BridTC11-BridTC18 provide the development management policies for the strategy's delivery and for development elsewhere in the AAP area.</li> <li>▪ BridTC19 elevates the strategy's delivery in policy (the Council's commitments to using its orders and other powers to deliver the strategy and to mounting the initiatives required to capture the benefits locally and BridTC20 sets out the policy for using S106 obligations,</li> </ul>

	including the standard charge for the contributions to the Strategic public realm.
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should be logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<p>23. The AAP complies with the statements and stages in the LDS, but departed from the timetable in 2009, but updates have been advertised on the Council's website.</p> <p>The Council submitted a revised LDS (LD18) to the Secretary of State (SoS) on 18 October. Assuming the SoS does not direct any changes to the scheme, it will come into effect on 21 November 2011. The revised LDS does not affect the AAP.</p> <p>The AAP includes nothing that should be in another plan, nor does it unnecessarily repeat material already in another plan.</p> <p>The reports of consultation set out fully how the comments and representations have been considered and dealt with (CD13, CD11, CD08, CD20.1-20.3)</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>24. Section 5 of the AAP sets out the delivery strategy in full, including the role of delivery partners. Table 6.1 provides details.</p> <p>CD20.2 shows that English Heritage, Environment Agency and Natural England, with the Council's minor changes (CD18.2), support the AAP.</p> <p>The Council's responses to the Inspector's Hearing Matters provide full details, including:</p> <ul style="list-style-type: none"> <li>▪ the details of the negotiations between the Council and its main delivery partners (Matter 3 papers and Appendix 3.2);</li> <li>▪ Matter 6, paras 16-18.</li> </ul>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>25. The development management policies are supportive of the strategy, and enable its delivery. The Council's response to the Inspector's Matter 5 sets out a full account.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>26. The strategy's infrastructure requirements are fully identified and the plan provides for their delivery. The Council's response to the Inspector's Matter 6, paras 21-23 explains that there is no infrastructure to be delivered other than that identified in BridTC3-BridTC8.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies</p>	<p>27. The AAP sets out the proposals in full in Sections 5 and 6.</p>

clearly identified?	
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	28. The AAP makes this clear in Sections 5 and 6.
29. Is it clear who is intended to implement each part of the strategy/ development plan document? 30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	29. The AAP makes this clear in Sections 5 and 6. Further details are provided in the Council's responses to the Inspector's Hearing Matters 3 and 4. 30. The Council's response to the Inspector's Matter 3 explains fully, and Appendix 3.2 provides the details of the position with the key delivery partners.
31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	31. The AAP reflects fully the principles of a spatial plan, and it reflects the Sustainable Community Strategy. 32. It is a plan specifically for the regeneration of the town centre. It will restructure the town centre, remove the market failures that account for its decline, endow it with needed infrastructure and public realm, and return it to economic vitality and viability. The AAP is designed to enhance trading conditions for existing businesses. Its proposals are in line with national and local policy for environmental sustainability and the conservation and enhancement of heritage assets. The benefits of deliver are economic, environmental and social, and accord with all other relevant local strategies and programmes.
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	33. The AAP builds in the provisions necessary for its flexibility. The Council's response to the Inspector's Matter 6 paras 28-41 explain fully.
<b>Flexible</b>	

34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	34. The AAP builds in the provisions necessary for its flexibility. The Council's response to the Inspector's Matter 6 paras 28-41 explain fully.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	35. The AAP builds in the provisions necessary for its flexibility. The Council's response to the Inspector's Matter 6 paras 28-41 explain fully.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	36. The AAP promotes a very specific strategy although the policies permit sufficient flexibility to achieve their objectives and still deliver the strategy as set out in BridTC1. The AAP sets out the approach to 'milestones' and 'triggers' in Section 5, paras 6.17-6.19.
<b>Monitoring</b>	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	37. Chapter 5 of the AAP sets out the Council's delivery plan for the principal elements of the Regeneration Strategy and Chapter 6 addresses the timetable for delivery and the milestones and other indicators for monitoring progress. The output targets and indicative delivery timetable are set out in Table 6.1: Monitoring Framework.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	38. It is clear. The AAP para 6.3 sets out the objectives-targets-indicators approach. The Bridlington Renaissance Team will monitor the progress of the AAP's delivery as provided for by the AAP Section 6, and the findings will be reported in the Council's Annual Monitoring Report.
39. Are suitable targets and indicators present (by when, how and by whom)?	39. Table 6.1 of the AAP sets these out.
<b>National policy</b>	
40. Does the development plan document contain any policies or proposals that are not	40. The AAP document is consistent with national planning policy. The AAP, Appendix 2, provides a full account. The Council's response to the Inspector's Matter 2, Appendix 3.3 provides further details, and

<p>consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>brings the AAP consistency up to date with emerging national policy.</p> <p>41. The AAP does not depart from national policy.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>42. The AAP does not repeat policies in national guidance.</p>