

OVERVIEW PAPER:

The Inclusion of the Harbour Top is Positive, Justified, Effective and Consistent with National Policy

Introduction

1. This paper is one of five submitted by the East Riding of Yorkshire Council in response to the Inspector's provisional views on the inclusion of the Harbour Top as part of the comprehensive Burlington Parade development scheme. The five papers – ED50-ED53 and ED55 – expand on and add to the evidence that is already before the Inspector. They should be read together and with the earlier evidence.
2. This paper (ED50):
 - i. Signposts the earlier evidence that justifies the inclusion of the Harbour Top as part of Burlington Parade and demonstrates its effectiveness.
 - ii. Pulls together the principal points of the additional evidence.
 - iii. Shows that the AAP's promotion of the Harbour Top is sound on the provisions of the National Planning Policy Framework (NPPF). The Harbour Top is:
 - a) an essential part of the AAP's positively prepared regeneration strategy that meets the Town Centre's objectively assessed development needs;
 - b) justified by proportionate evidence as the most appropriate strategy when considered against reasonable alternatives;
 - c) effective and capable of delivery in advance of the Marina; and
 - d) consistent with national policy, including policy on the conservation and enhancement of the historic environment.
 - iv. Explains how the AAP's provisions for the Harbour Top comply with national policy in terms of their flexibility.
 - v. Sets out the Council's proposed minor changes to BridTC3 to elevate in policy the Council's undertakings, set out in the AAP's written statement, in respect of the impact of the Harbour Top on the Harbour's operations and the BHC's finances.
 - vi. Notes the Council's s20(7C) request to the Inspector to make any main modifications to the AAP she considers necessary to make it sound.
3. The four other papers submitted as additional evidence show the following:

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- i. It is technically feasible to accommodate the Harbour Top development at the west end of the Harbour and at the same time to benefit the Harbour's operations and finances (ED51).
 - ii. The BHC's in-Harbour alternative to the AAP's Harbour Top and Marina proposals could not meet the BHC's operational or commercial objectives (ED52).
 - iii. The Harbour Top is essential to the viability and deliverability of Burlington Parade and therefore both to the capture of its benefits for the established shopping core and for the achievement of the AAP's regeneration objectives (ED53).
 - iv. The Harbour Top and Marina developments will cause some harm to the significance of the heritage assets, although falling short of substantial harm. In some cases, the changes will positively enhance the character of the Conservation Area and the setting of the listed buildings. The Harbour Top proposals will secure the optimal viable use of the Harbour heritage assets, and will deliver 'substantial public benefits'. These substantial benefits will be well in excess of the 'public benefits' that should be weighed in the balance where developments cause less than substantial harm to the significance of heritage assets (ED55).
4. The draft of the Bridlington Quay Conservation Area Character Assessment (BQCACA) is provided at ED54.¹ The Council has worked with English Heritage on both ED54 and ED55.

The Evidence Already Submitted

5. The Council has already submitted evidence that justifies the inclusion of the Harbour Top as part of Burlington Parade. The evidence shows that the Harbour Top, as part of Burlington Parade and the package of measures that makes up the AAP's regeneration strategy, is the only effective option for delivering the step change required for the sustainable transformation of the Town's fortunes and the recovery of its vitality and viability.
6. The evidence:

¹ The Council explained at the December 2011 Hearing that it was in the process of preparing the CACA and that it would be used to inform the final draft of the AAP's SPD (CD06, which was prepared before the Bridlington Quay Conservation Area was designated). The draft CACA (ED54) and revised draft SPD will be consulted upon when the examination of the AAP is complete, and adopted alongside the AAP.

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- i. demonstrates that the Town Centre seriously underperforms as a shopping centre and leisure destination for its catchment *and* is at risk as a holiday resort (AAP-CD01, Appendix 1, paras 1-13 and 40-47; and LD01, sections 3 and 4);
- ii. sets out the reasons why the Town Centre underperforms its potential (LD01, paras 6.1-6.7; and CD01-AAP paras 1.13-1.17 and App 1, paras 30-31, 44-46 and 58-62);
- iii. explains that these reasons account for why the Town Centre failed to attract any substantial private sector investment during the recent, unprecedented and long-running property boom (ED02, Introduction; and ED25, paras 2-3);
- iv. shows that these reasons relate fundamentally to the way the Town Centre functions physically – the arrangement of the principal land uses, the inadequate connections between them and the lack of suitable sites (size, configuration, location, surrounding environment) to accommodate the types, quality and scale of development the Town Centre requires for its vitality and viability (LD01, paras 6.4-6.6);
- v. explains why the Town Centre must be restructured to correct these fundamental problems (LD01, paras 1.22-1.29; CD01-AAP, paras 1.8, 3.5; ED25, Appendix 3.5);
- vi. explains why market forces have not, and cannot, effect this restructuring without the public sector's intervention (ED06, Introduction and paras 1.2.1, 2.1.1 and 2.1.7; CD01-AAP, paras 3.5-3.8; ED25, Appendix 3.1);
- vii. demonstrates why the AAP's Burlington Parade development is required to achieve the needed restructuring (CD01-AAP, para 2.30i and 2.37) – that is, why Burlington Parade comprises two new anchors at either end of the comprehensive development site (the unit shop scheme and the Harbour Top), and why it connects these to each other and to the established Town Centre core via the Gypsy Race park and avenue, the new Primary Retail Circuit and the new Town Square at Bridge Street / Queen (BridTC1-5);
- viii. demonstrates why no other site or location in the Town Centre or within the Burlington Parade site can substitute for the part played by the Harbour Top (CD01-AAP paras 1.41, 1.48, 3.10iii, 3.13 and 3.28-3.30; and ED25, paras 6 and 12-16);
- ix. sets out the Council's commitment to using its powers, land and finances to invest in the strategy to restructure the Town Centre and to endow it with the infrastructure

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it requires (CD01-AAP paras 3.6-3.8, 3.35, 5.5, 5.29-5.31, 5.44-5.45 and 5.82-5.90; ED02 paras 2.4.1-2.4.2; ED06; and ED28, Appendix 6.1);

- x. shows that the Council has the financial resources and political authority required to deliver the Harbour Top as part of Burlington Parade in the public interest (ED06);
- xi. demonstrates that it is technically feasible to introduce the Harbour Top development into the west end of the Harbour without harm to the Harbour's operations or finances (ED22, Matter 2, Appendices 2.1-2.3; and ED19d and ED19f); and
- xii. shows that both English Heritage (CD20.2, RO15, pg 21) and the Environment Agency (CD20.2, RO16) are content that the AAP complies with national policy in respect of the conservation and enhancement and the management of flood risk. Both EH and EA also consider that the AAP makes adequate provision, in line with the NPPF, for:
 - a) the conservation and enhancement of the designated heritage assets (NPPF, paras 126 and 134; ED25, Burlington Parade, paras 20-22 and Appendix 3.7; and CD18.2 nos 33 and 38-40); and
 - b) making the Harbour Top development safe without increasing flood risk elsewhere (NPPF, paras 100-102; and ED25, Appendix 3.6).

The Additional Evidence for the Further Hearing

- 7. The Council has submitted further evidence that expands on and adds to that already submitted to show that the inclusion of the Harbour Top within Burlington Parade is justified by up-to-date evidence and is effective in the terms of the NPPF.

The Harbour Top would not Harm the Harbour's Operations or the BHC's Interests

- 8. ED51 was prepared by Michael Kent, Leigh Fisher, whose evidence shows that:
 - i. It is feasible to introduce the Harbour Top development in advance of the main works to the Harbour to create the AAP's Marina. The Harbour Top development together with the associated operational works, would constitute the first phase of the Marina, but would be capable of standing alone. Michael Kent shows that the works entailed in either option can be designed and implemented so as to safeguard the Harbour's operations and protect the interests of its users.

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- ii. The proposed options, at no cost to the BHC, would: replace the operational land lost to the Harbour Top commercial development; relocate the operational facilities where feasible and replace others with purpose-designed new facilities; provide for a range of improvement works to the land and water areas at the west end of the Harbour; and, if required for wave attenuation within the Harbour, upgrade the tourist boat operating area at the east of the Crane Wharf Jetty.
- iii. Two additional options to enhance the proposed first phase are possible, which would further improve the Harbour's operating efficiencies, both of which would create additional dry-side land for the Harbour's operational and parking use which would be an improvement over current circumstances. These options would be considered if identified as necessary during the further technical development of the design.
- iv. The works could be staged to maintain the Harbour's operations and services to its users throughout the construction period.
- v. Car parking income during construction would be largely maintained throughout.
- vi. The Harbour revenues would increase by c £88k per annum on completion; and the Council would compensate the BHC's temporary, pre-completion, revenue losses attributable to the construction programme.
- vii. The phasing of the Marina through the early delivery of the Harbour Top development would also reduce the upfront funding requirement for the main Harbour works and the construction of the Marina.

The BHC's In-Harbour Marina Could Not Achieve their Operational or Commercial Objectives

9. ED52 was prepared by Bill Schlegel, Jacobs Engineering Ltd, whose demonstrates that the BHC's in-Harbour alternative to the AAP's Marina (Illustrative Layout IP1509/210B, CD17, RO4) is not capable of meeting either the BHC's operational or its commercial objectives:
 - i. The BHC's proposals for 200 berths within an impounded Harbour amount to less than two-thirds of the robustly projected demand for sailing berths (SD03). The reduction in berths would diminish the otherwise achievable benefits associated

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with the AAP's Marina, including the increase and diversification of the visitor base and the associated spending in the town.

- ii. The BHC's proposals for converting the Harbour for use largely as a leisure marina are contrary to their stated requirements for a commercial operating facility. The in-Harbour scheme does not meet the commercial berthing and operating space requirements specified by BHC for the new development.
- iii. The BHC's proposals result in very limited flexibility to respond to opportunities for growth in the leisure, commercial or fishing sectors.
- iv. An in-Harbour marina, in contrast to the AAP's proposals for the Harbour Top and Marina:
 - a) would not be capable of achieving the YHA's Gold Standard, diminishing the competitiveness of a Bridlington marina offer;
 - b) would limit the capacity for the Harbour to offer 'safe-haven', creating safety concerns;
 - c) would restrict the Harbour's accessibility, creating further safety concerns and impacting adversely on the fishing industry;
 - d) would require part of the listed South Pier to be widened it to allow for vehicles to turn around;
 - e) would impact adversely on the fishing operations, both during the construction phase and on completion;
 - f) raises questions as to the feasibility of retaining the Lawrence Complex – a key source of the Harbour income – because of the level differences that would have to be resolved; and
 - g) would create severe disruption to the Harbour's operations during the construction phase, posing a serious risk to the Harbour's long term competitiveness, in particular the retention of the fishing industry.
- v. The annual revenues to the BHC without the AAP's Harbour Top development would only break even or even fall slightly. Once an allowance for future lifecycle works is made, annual revenues are estimated to *fall* by c £65k per when assessed

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on a similar basis to the AAP scheme. Thus, the in-Harbour option would produce no return on the substantial capital investment.

The Harbour Top is Required for Burlington Parade's Viability and the Delivery of its Benefits for the Existing Retail Pitch

10. ED53 has been prepared by John Weir, Drivers Jonas Deloitte, who considers the Harbour Top development to be justified on the following grounds:
- i. There is significant expenditure leakage from the Town Centre, and it suffers from a lack of interest from investors.
 - ii. The tourism sector requires a greater diversity of attractions, especially those which can offer growth, year round activity and higher spending.
 - iii. The Town Centre's greatest, most distinctive and differentiating asset – which is also on and associated with the seaside – is the Harbour, but it is largely obscured from the Town Centre.
 - iv. The town requires more than an improved and tightened retail offer that can be found in most town centres across the country.
 - v. A step change is required in the town's performance, and the Harbour Top development is required to achieve this. It performs critical functions that no other site or location can:
 - a) it creates a meaningful anchor destination point for Burlington Parade, on the seafront and overlooking a significant heritage asset;
 - b) it is located so as to draw footfall from the site of the unit shop scheme through the whole of the Burlington Parade site to the Harbour;
 - c) it creates an essential 'three-node' circuit of the Town Centre – the unit shop scheme, the historic retail pitch and Harbour – with interlocking desire lines for pedestrians; and
 - d) it provides a reason for visitors to come to Bridlington in the first place, all year round, by offering in a distinctive setting facilities which either do not exist in the Town Centre or which are unable at present to attract the scale of custom the town needs.

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- vi. Without the Harbour Top:
 - a) it will be extremely difficult to create the confidence investors will require if they are to be persuaded that the AAP's aspirations for Bridlington are sufficiently ambitious;
 - b) it will send the opposite signal to the market – that the Council is not committed to the step change the AAP proposes and that the AAP's evidence base shows is achievable;
 - c) developers will tend to cherry pick parts of the Burlington Parade site (e.g., the unit shop scheme), but not deliver the comprehensive development the AAP proposes;
 - d) without the Harbour Top to draw footfall through the site, it will be very difficult to attract the investment the AAP seeks along the Gypsey Race; and
 - e) a unit shop scheme, in the absence of the Harbour Top anchor to help pull footfall to the established retail core, creates the otherwise avoidable risk that that the unit shop scheme will shift trade away from the established core.
- vii. The comprehensive development of Burlington Parade as sought by the AAP will not be viable; and it could not be delivered within the funding gap that the Council is willing to finance. As a consequence, the great likelihood is that the Council will be unable to finance the site assembly, public realm costs and infrastructure required to deliver the AAP's scheme.
- viii. There is a severe risk that the existing retail pitch, without the Harbour Top anchor and connections to it, will deteriorate further when the unit shop scheme is built. The Harbour Top is essential to delivering the benefits for the existing retail pitch that are sought by the Burlington Parade proposal.

The Impact of the Harbour Top and Marina on the Designated Heritage Assets

- 11. The Council, working with the Councils' conservation specialist, Roger Tym & Partners and English Heritage, has prepared a Heritage Impact Assessment (ED55) that considers the effect of the Harbour Top and Marina proposals on the designated heritage assets.

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12. ED55 draws on the evidence of the significance of the heritage assets set out in the draft Bridlington Quay Conservation Area Character Assessment (ED54) and shows:
- i. To the extent that the significance of the designated heritage assets will be harmed by the Harbour Top and Marina developments, the harm is assessed in every case to be 'less than substantial' in the terms of NPPF para 134.
 - ii. The assessment in every case has had regard for, in line with NPPF paras 131-132:
 - a) the significance of the asset;
 - b) the nature of the impact;
 - c) the desirability of sustaining and enhancing the significance of the assets and putting them to viable use consistent with their conservation;
 - d) the positive contribution that the conservation of the assets will make to the town's sustainability and the viability of the AAP's regeneration strategy; and
 - e) the desirability of ensuring that the Harbour Top and Marina make a positive contribution to local character and distinctiveness.
 - iii. The less than substantial harm to the designated heritage assets is outweighed by the public benefits the developments will deliver, including the optimum viable use of the designated assets (NPPF, para 134 and ED55, Appendix 3).
 - iv. The developments will also sustain and enhance the significance of designated heritage assets and their setting (NPPF, para 131), including:
 - a) the works to strengthen and waterproof the South Pier, which will remove the incongruous materials used for past repairs and extend the life of the pier (ED55, 1.2);
 - b) the public realm works on the Harbour Top which will restore and conserve the historic fabric, enhance the Harbour's historic character of the area and improve the setting of the listed buildings (ED55, 1.3);
 - c) the removal of the alien 20th C fish market structure from the South Pier and remove this obstruction to the historically significant long views across the pier from its western end (ED55, 1.8);

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- d) the preservation and enhancement of the Harbour Grotto which is little used at present and whose fabric is at risk (ED55, 3.1);
- e) the removal of the modern Chicken Run Jetty structure, improving the distinctive openness of the Harbour landscape at the level of the quayside (ED55, 4.3); and
- f) the public realm works in and on the northern side of the Harbour, very significantly enhancing the setting of the Harbour (ED55, 8) and the listed buildings to the north of the Harbour (ED55, 10).

The AAP's Provisions for the Harbour Top are Sound

13. The evidence shows that the AAP's provisions for the Harbour Top are sound in the terms of NPPF para 182:

- i. The proposals for the Harbour Top have been positively prepared. The Harbour Top plays an essential role in delivering the AAP's regeneration strategy, based on the objectively assessed needs of the Town Centre for development and infrastructure (CD01-AAP, Appendix 1; LD01).
- ii. The proposals for the Harbour Top are justified:
 - a) The up-to-date evidence shows the Harbour Top is essential to restructuring the way the Town Centre functions and therefore to transforming its appeal to investors (developers and inward investors), shoppers, future residents and visitors (ED53 as well as the already submitted evidence cited above at para 6).
 - b) That evidence confirms that the Harbour Top is the most appropriate option for restructuring the Town Centre and transforming investor confidence in it, taking into account the AAP's objectives and the evidence on reasonable alternatives. Sustainability considerations informed the decision-making process throughout the SA/SEA process and through the final report of the SA/SEA. The final report makes clear how the decisions were made on the preferred options. ED52 confirms that an in-Harbour alternative is not a feasible option for achieving the AAP's regeneration objectives, or for delivering an alternative marina. ED52 therefore shows that nothing has changed since the AAP's

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Issues and Options stage that would alter the outcome of the optioneering process.

- iii. The AAP's proposals for the Harbour Top are effective, will lead to the regeneration outcomes sought and are deliverable over the plan period (CD01-AAP, Section 5; ED25, Burlington Parade, paras 25-27 and Appendix 3.2; ED02 paras 2.4.1-2.4.4). In addition:
- a) The AAP's development management policies, with the minor changes already accepted and those proposed here in Appendix 1, are supportive of the strategy and objectives for the Harbour Top's inclusion in Burlington Parade. The further proposed changes to BridTC3 provide, in policy, for the Council's undertakings to the BHC to protect the Harbour's operations and the BHC's finances.
 - b) English Heritage is content that the AAP's provisions are adequate to ensure that no planning application will receive permission without acceptable responses to the criteria set out in BridTC3 and BridTC4 (CD20.2, RO15, pg 21).
 - c) The Environment Agency is content, both that the Sequential Test has been appropriately applied in the choice of the Harbour Top and that the Exception Test is capable of being passed (CD20.2, RO16). In any case, the vulnerable and more vulnerable uses will be located at street level above two decks of parking, with the means of escape onto South Cliff Road. The changes will be an improvement on current circumstances (e.g., the Lawrence Complex is a more vulnerable use at the quayside level).
 - d) The Harbour Top delivery mechanisms have been clearly identified. The Council wishes to partner the BHC, but has the powers and resources needed to intervene in the public interest if, as a last resort, agreement cannot be reached (ED02, para 2.4.4). All of the stakeholders do not have to be committed for the Harbour Top proposals to be effective (NPPF para 155); the Council has worked hard and expended substantial resources and time to secure agreement as far as has been possible, having regard for the Council's duties to the wider public interest.

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- iv. The AAP's proposals for the Harbour Top enable the delivery of sustainable development in ways that are wholly consistent with national policy:²
- a) The Harbour Top delivers 'mutually dependent' economic, social and environmental benefits that would not otherwise be achievable (NPPF paras 7-8);
 - b) The Harbour Top proposals seek positive improvements in the quality of the Town Centre's built, natural and historic environment (NPPF para 9). The Harbour Top is the catalyst for delivering 1,900 jobs in the town – including a *net gain* in the number of jobs in the Harbour; replaces poor quality design in the Harbour with better design, including removing structures which have a negative impact on the character of the Conservation Area and setting of the listed buildings; improves the conditions in which Bridlington's communities and its visitors will live, work, travel and take leisure; and it widens the choice of high quality homes;
 - c) The proposals for the Harbour Top take local circumstances into account, and respond to Bridlington's very specific opportunities for sustainable development (NPPF paras 10 and 14) and provide for sufficient flexibility to respond to rapid change (NPPF para 14; see paras 16-17 below);
 - d) The proposals for the Harbour Top are a positive response to an opportunity to meet Bridlington's objectives assessed development needs (NPPF para 14) and follow the NPPF's approach of 'the presumption in favour of sustainable development' so that Harbour Top will be capable of delivery without delay (NPPF para 15).
 - e) The proposals for the Harbour Top comply with the NPPF's planning principles: the Harbour Top is a creative response to ways of enhancing a place where people live their lives; it proactively drives and supports sustainable economic development to deliver the homes, businesses and business space, infrastructure the community needs and the thriving place that Bridlington is capable of becoming; the proposals seek high quality design and a good standard of amenity for existing and future occupants; the Harbour Top proposals reflect the role of the town in its wider context, take account of the

² The compliance of the Harbour Top and Marina with the NPPF's provisions (paras 126-141) for conserving and enhancing the historic environment are set out in ED55; para 15iii above explains that English Heritage has no objections to the AAP's approach or to its provisions. The compliance of the Harbour Top with the NPPF's provisions in respect of flood risk (NPPF paras 100-102) is set out in CD01-AAP, paras 139-145; para 15iiic above explains that the Environment Agency has no objection to the AAP's approach or to its provisions.

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transition to a low carbon economy, climate and coastal change, including the conversion of existing buildings, and use existing land to promote mixed use development; and the Harbour Top development conserves the town's distinctive heritage consistent with its significance, focuses development where it can be sustainable; and supports the health, social and cultural wellbeing of all Bridlington's communities.

- f) The Harbour Top is essential to achieving the AAP's objectives for recovering the vitality and viability of the Town Centre (NPPF para 23); locates development where it reduces the need to travel (NPPF para 34); and locates parking where it can be well-designed, safe and secure and widens choice (NPPF paras 40-41).
- g) The Harbour Top will deliver housing that contributes to the town's objectively assessed needs and widens choice (NPPF para 47).
- h) The AAP (BridTC3, ED54, ED55 and the final version of the SPD to come) aims for high quality design on the Harbour Top (NPPF paras 58-59). The proposals also create connections between people and places and integrate the historic environment because both are essential to achieving the benefits sought from the Harbour Top for the whole Town Centre (NPPF para 61).
- i) The AAP's provisions for the Harbour Top are consistent with the provisions for plan-making (NPPF paras 156-157), including: sites for appropriate development and a flexible use of the land, with sufficient detail on form, scale and access to achieve the planning objectives; a clear strategy for enhancing the built and natural environment; a proportionate evidence base, including on the needs of businesses and land to accommodate these needs (NPPF paras 160-161) and for infrastructure (NPPF para 162); and the Harbour Top proposals are viable, deliverable in a timely fashion and are accompanied by appropriate safeguards (NPPF paras 173, 176-177).

The Flexibility of the Provisions for the Harbour Top

14. The AAP's provisions for the Harbour Top build in the flexibility needed in two ways – taking into account that fact that, to succeed, the AAP's regeneration strategy must correct evidenced market failures and put in place the other changes required for the Town Centre is to recover its vitality and viability and prosper.

15. The flexibility exists in:

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- i. the scale and mix of development on the Harbour Top (the AAP does not specify this); and
 - ii. the extent of the development platform (there is nothing in the AAP to require the development platform to occupy the whole of designated site in the Proposals Map).
16. The scale and mix of the development and the extent of the development platform will be determined by all of the following in combination:
- i. the investment preferences of the Council's selected joint venture partner;
 - ii. the requirements for the Harbour's operations and the undertakings to the BHC by the Council in BridTC3 as proposed for amendment;
 - iii. by the requirements to design the scheme so that it complies with the design quality and heritage impact criteria in BridTC3; and
 - iv. by the requirements to design the scheme so that it complies with the provisions for flood risk set out in BridTC3 and BridTC4.
17. The AAP builds in the safeguards needed to protect the Harbour's operations and the interests of the BHC's, to conserve and enhance the heritage assets and to protect the development and the wider area from the risk of flooding.
18. The Council considers therefore that the AAP's provisions for the Harbour Top fully satisfy the provisions of national policy for the flexibility of local plans (NPPF, paras 14 and 157).

Proposed Changes to BridTC3 – Undertakings to the BHC

19. The Council proposes the minor amendments set out in Appendix 1 to AAP policy BridTC3. The Council's aim is to provide, in policy, the BHC with the safeguards they seek for the Harbour's operations and finances.
20. The Council's preference is to agree with the BHC the preferred option (ED51) for introducing the Harbour Top platform and making the changes it triggers to the west end of the Harbour. Once the principles have been agreed, the Council is committed to working with the BHC to agree the detailed works and implementation plan, including the terms of the land swap and financial agreement to be concluded.

East Riding of Yorkshire Council's Section 20(7C) Request

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21. The Council has formally requested the Inspector under the provisions of s20(7c) of the Planning and Compulsory Purchase Act 2004 as amended by s112 of the Localism Act 2012 to recommend any main modifications that she considers are required to make the AAP sound and therefore capable of adoption.

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Appendix 1: Proposed Changes to BridTC3

APPENDIX 1:

**PROPOSED CHANGES TO BRIDTC3:
DETAILS OF MEASURES TO SAFEGUARD THE
HARBOUR OPERATIONS AND BHC FINANCES**

Bridlington Town Centre AAP Examination: Additional Hearing into the Harbour Top
East Riding of Yorkshire Council

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Appendix 1: Proposed Changes to BridTC3

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Appendix 1: Proposed Changes to BridTC3

Proposed Minor Changes to BridTC3

1. The Council proposes minor changes to AAP policy BridTC3. The changes are proposed to provide, in policy, the BHC with safeguards as to the Council's commitment to:
 - a) the works that will ensure the Harbour Top development will include works to replace the BHC land;
 - b) provide the new and replacement facilities needed for the efficient operation of the Harbour including the operational parking; and
 - c) compensate the BHC for any income loss.
2. The proposed minor change amends BridTC3.2d and introduces a new part 3 to BridTC3, as follows:

BridTC3:

2.
 - d) The redevelopment of the Harbour Top, on Parcel 4 of the Masterplan, to provide for a mix of retail, leisure and housing development, including a full service hotel overlooking the Harbour and well-related to the Spa, plus at least 150 car parking spaces. The development will be designed to protect and enhance the Conservation Area of which it is part, conserve the elements that contribute to the significance of the listed south pier, and be phased to permit the continued, efficient and viable, operation of the Harbour ~~Trust Port~~ Port; and
3. The Harbour Top development on Parcel 4 will not proceed until there are arrangements in place that will:
 - a) replace the Trust Port-owned land with Council-owned land within the Harbour;
 - b) replace with new or temporary facilities the Harbour's operational buildings and other facilities, including those for the Harbour's users, that have to be relocated to accommodate the Harbour Top development;
 - c) replace with decked car parking the Harbour's operational surface car parking; and
 - d) compensate the Harbour Commissioners for any income lost through the introduction of the Harbour Top.

(continue as drafted and re-number the parts of the policy to accommodate the additional provisions)