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5 December 2007

John Lister  
Head of Bridlington Development Plan  
Bridlington Regeneration Partnership  
Town Hall  
Quay Road  
Bridlington  
YO16 4LP

Dear John

**East Riding of Yorkshire Local Development Framework  
Bridlington Town Centre Area Action Plan Preferred Options**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Area Action Plan (AAP) Preferred Options document for Bridlington Town Centre and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the AAP is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004), the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005) and The Secretary of State's Proposed Changes to the Yorkshire and Humber Plan (September 2007).

Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that

strategy because of the strong possibility that it will be published in that form by the Secretary of State”.

As the Proposed Changes are now published, Assembly responses to consultations on DPDs need to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that ‘considerable weight’ will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs. At the same time, it will be important to note that the Assembly itself will be making comments on the Proposed Changes and that the final version of the new RSS is expected early in 2008.

Both the existing and draft Regional Spatial Strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region’s city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

I trust that the comments contained in Annex A are helpful to you as you prepare the Bridlington Town Centre Area Action Plan for submission to the Secretary of State. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your Area Action Plan.

Regards

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

Jenny Poxon  
Head of Planning Delivery and Conformity

## **Annex A**

### **General Conformity with the Regional Spatial Strategy**

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

It will be important in the submitted Bridlington Town Centre Action Plan to highlight the need for there to be 'general conformity' between the RSS and the Area Action Plan, to ensure that the two strands of the development plan are mutually supportive. We welcome the explanation of the RSS in Appendix 3 but feel this would be more useful at the start of the document. This would also help to put into context references to the RSS made throughout the document.

### **Vision and Objectives**

Draft RSS identifies Bridlington as a Principal Service Centre within the region's settlement network. It should be noted that the Secretary of State's Proposed Changes to the Draft RSS introduces a change in terminology, renaming Principal Service Centres as Principal Towns. Policy YH6 A states that Principal Towns should be the main local focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities. Part B of Policy YH6 seeks to enhance the roles of Principal Towns as accessible and vibrant places to live, work and invest.

Policy YH7 relates specifically to rural and coastal areas and seeks to protect and enhance rural and coastal areas as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social resource. The policy seeks to ensure that all plans, strategies, investment decisions and programmes achieve a high standard of design; support innovative means of accessing and delivering services; retain and improve local services and facilities; support economic diversification and meet locally generated needs for market and affordable housing.

The Assembly considers that the vision and strategic objectives of the AAP are consistent with the Core Approach of the RSS. In particular, objective 1, which seeks to reinvigorate the Town Centre's year round offer to meet the needs of its residents and businesses reinforces the RSS' transformational agenda and approach to coastal areas.

## **Population and Housing**

The Local Authority should note the following changing national and regional context to population and household projections, which may have an impact on the estimated figures for Bridlington. The 2004-based sub national population projections released by ONS suggest a population increase of 35,400 between 2006 and 2016 in the East Riding of Yorkshire. Initial work commissioned by the Assembly on migration shows that the 2006-based national population projections (yet to be disaggregated to the sub national level) could equate to an increase of 19% between 2006 and 2029 for the Humber sub region compared to the 14% increase predicted by the 2004-based projections.

Household projections calculated by the Department for Communities and Local Government (using the initial 2004-based projections) show an additional 25,000 households in East Riding by 2016. The expected increase in household growth between 2004 and 2029 is 41%. The differences between the 2004 and 2006-based population figures will have a significant impact on the household projections. It is probable that the next set of household projections, once published by CLG, will show a similar increase.

The analysis of migration trends in the region show that the East Riding will see an average rate of net internal migration of 4,200 people per year and an average inflow of 1,700 international migrants per annum. It should be noted that these figures represent trend-based scenarios and do not account for policy or other interventions.

Draft RSS sets a net housing provision target for East Riding of 1150 dwellings per annum for the whole of the plan period from 2004 to 2021. This gives a total figure of 19,550. The approach to housing provision in the Humber sub region reflects a policy of strategic restraint in the rural areas north of the Humber to support the transformation of Hull and the Gateway Hull East Riding Pathfinder programme. The approach also seeks to support for role of the Principal Towns and the regeneration of Bridlington. The Proposed Changes to the RSS retains the annual figure of 1150 dwellings but extends the plan period through to 2026, increasing the total amount of provision to 25,300 dwellings.

## **Jobs and Employment Land**

It is noted that the AAP estimates a need for an additional 2,900 jobs by 2016 and 2,000 – 4,000m<sup>2</sup> of office floor space. Draft RSS predicts 123,198 FTE in East Riding in 2005/6, rising to 126,700 in 2010 and 132,800 in 2016. The job growth and employment land forecasts in the Proposed Changes to the RSS are based on a 2007 Scenario D run-off of the Regional Econometric Model. Proposed Changes forecasts potential annual job growth in the East Riding to be 760.

Draft RSS forecasts the change in B1 employment land between 2006 and 2016 in the East Riding to be approximately 9-17 hectares. Draft RSS gives district level guidance for employment land requirements and states that for the Humber

Estuary districts, there is a need to ensure that the employment land portfolio offer seeks to capitalise on opportunities from the Humber Ports and the port logistics cluster. The Proposed Changes gives a figure of 20 hectares for the potential net change in industrial and storage/distribution land in the East Riding. The guidance on employment land provided by the Proposed Changes states that in the East Riding and Hull there is a need to review current allocations, taking account of the role of Hull as a Regional City and the need to facilitate port-related development and urban transformation. There is also a need for sites for an appropriate scale of development for rural diversification focussed on the Principal Towns. The Local Authority should ensure that the Area Action Plan contributes to the employment land needs of the district, particularly the need to support economic diversification.

### **Location of Development and the Siting of Town Centre Uses**

Policy YH8 of draft RSS provides guidance on the location of development within settlements. Part A states that the allocation of land for new development will be concentrated in the Regional Cities and Sub Regional Cities and Towns followed by sufficient development in the Principal Towns to enable them to fulfil their service centre role. Limited development is allowed in Local Service Centres with a focus on meeting local needs.

Part B of the policy advocates a sequential approach which gives first priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within the centres identified in Part A; second priority to other suitable infill opportunities within these centres and third priority to planned growth areas on the periphery of or well related, in public transport route terms, to these centres.

Part C of Policy YH8 requires local planning authorities to adopt a transport-orientated approach when identifying sites for development. Proposed Changes to RSS suggests amendments to Policy YH8 but does not remove its focus on the sequential approach to allocating sites for and determining the location of development. Proposed Policy BridTC10 is consistent with national policy and the RSS however the Assembly would like to see an additional transport-orientated element introduced to the sequential approach of the policy.