

Our ref: General/40b – Planning Conformity/Final Response/East Riding Redevelopment of existing holiday park, Wilsthorpe, May 08

7 May 2008

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Dear Philip

Application reference: DC/08/01227/SOUT/STRAT/JC2

Redevelopment of existing holiday park for the erection of holiday apartments at South Shore Holiday Village, Wilsthorpe.

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

Please note that the Secretary of State's Proposed Changes to Draft RSS have now been published (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".

Assembly responses to consultations on strategic applications will therefore have 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 and application Inquiries. At the same time, it should be noted that the Assembly itself has made comments on the Proposed Changes and that the final version of the new RSS is expected in spring 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).

In seeking the implementation of these policies across the region, the Assembly therefore offers the following comments on the proposed redevelopment of existing Holiday Park in Wilsthorpe.

Regional Policy Context

Policies in the current RSS (December 2004) seek to focus development on the region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example, policies P1, S4, E1, SOC3, T1, T2).

Policies in draft RSS (December 2005) build on these principles. The Core Approach (Policies YH1 – YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional and Sub-Regional Centres and that away from these sufficient development should be permitted in Principal Service Centres to enable them to fulfil their role as service centres (Policy YH8 building on policies YH5, YH6 and YH7 and Policies E2 and T1).

Both current and draft RSS discourage development of Greenfield land, and state that priority should in fact be given to the re-use of Brownfield sites within settlements. Second priority should be given to other suitable infill opportunities, and thirdly, to planned growth areas. The proposed site is on Greenfield land.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional

Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes.

Location of Development

Policies in current RSS (2004) seek to focus development on the Region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the Region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example Policies P1, S4, SOC3, T1 and T2).

Policy YH8A of draft RSS (2005) specially states that the majority of new development and redevelopment should be concentrated within Regional and Sub Regional Centres, with sufficient development in both Principal and Local Service Centres to fulfil their prospective roles. Bridlington is identified in the draft RSS (December 2005) as a Principal Service Centre. Policy YH6 of draft RSS states that away from the Region's Regional and Sub Regional Centres, Principal Service Centres will be the main local focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities.

The Secretary of State's Proposed Changes to draft RSS (2007) emphasises that Principal Towns should be the main focus for housing, employment, shopping, education, health and cultural activities and facilities. Policy YH6 also provides for plans, strategies, investment decisions and programmes to enhance the vitality and viability of town centres. The Assembly would therefore support the development in principle as long as it would not harm the vitality, viability and function of Bridlington as a Principal Town.

Policy E2 of the Secretary of State's Proposed Changes to draft RSS (2007) states that town centres will be the focus for offices, retail, leisure, entertainment, arts, culture, tourism and more intensive sport and recreation.

Policy C1A of draft RSS (2005) states that the role of Bridlington should be developed as a Principal Service Centre. Policy C1E also provides for the focus of the majority of growth to be located in Scarborough with significant development at Bridlington.

The Secretary of State's Proposed Changes to draft RSS (2007) emphasises that Bridlington should be developed as a Principal Town. Policy C1B also provides for the diversification of the sub area's economic base, opening up employment land opportunities with tourism and other employment generating development and major new infrastructure at Bridlington.

Policies P1 and E4 of current and YH8 of draft RSS provide for an urban-focussed, transport-orientated approach to development. Policies P1 (b) and E4 (a) of current RSS state that, wherever possible, in considering development proposals preference should be given to land within urban areas.

Policy P1 in current RSS (2004) requires a sequential approach to site selection. YH8B of draft RSS (2005) also makes it clear that a sequential approach should be

taken in determining applications to ensure that developments are either reusing land or buildings within centres, infilling sites within centres or are sites that are well connected on public transport routes and that can maximise accessibility by public transport, walking and cycling.

Policy YH8C requires a transport-orientated approach to ensure that development makes the best use of transport infrastructure is focussed along existing or planned public transport corridors and maximises accessibility by public transport, walking and cycling. The applicant makes reference to a Park and Ride proposal but is not clear whether sustainable transport links can be developed between the development and the town.

Sustainable Tourism

The Secretary of State's Proposed Changes to draft RSS (2007) Policy E6 states that Local Authorities, Yorkshire Forward, Yorkshire Culture, the Yorkshire Tourist Board and other agencies should promote, support, and encourage tourism by adopting an overall approach which recognises the sustainable growth of tourism as an integral contributor to the economy and makes best use of indigenous resources and existing tourism infrastructure.

Policy E6 provides for plans, strategies, investment decisions and programmes to promote tourism in coastal resorts. Policy E6 states that in coastal resorts (including Bridlington) economic diversification should be promoted whilst consolidating and updating tourism facilities in ways which promote higher value activity, reduce seasonality and support urban regeneration.

Accessibility

Ensuring the accessibility of the development by non-car modes is a key principle of regional planning policy. The proposal is for a high-trip development and it is essential that access by non-car modes to the site is a reality. Accessibility criteria are set out in both the current and draft (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS). These tables include acceptable walking and overall journey times for the population that would be travelling to the site. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria. It is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

Car Parking

Policy T2 of the draft RSS states that the maximum parking standards for new developments must be in line with Table 16.5. There is not sufficient detail provided with the application to assess whether this be the case.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

Renewable Energy

The sustainable use of resources is a key theme in both current and draft RSS. Policy P6 of current RSS (2004) encourages new development to maximise energy efficiency and minimise resource demand. Policy ENV5 of draft RSS (2005) requires at least 10% of energy to be used in sizable new development is to come from on

site renewable energy sources. The Secretary of State's Proposed Changes to draft RSS (2007) removes this threshold, recommending that local authorities set their own proportions of the amount of energy to come from local renewable sources. East Riding of Yorkshire Council should ensure that renewable energy is promoted and secured in the proposed development.

Flood Risk

Current RSS (Policy R2) states that a sequential risk-based approach to planning for flood risk should be taken and that development in high flood risk areas should be avoided. Draft RSS policy (Policy ENV1) states that development in high flood risk areas should be avoided where possible and flood management should be undertaken pro-actively. ENV1 of draft RSS (December 2005) specifies that flood management will be required to facilitate development in the coastal towns. The Secretary of State's Proposed Changes to draft RSS (2007) states that the Region will manage flood risk pro-actively by reducing causes of flooding to existing and future development, especially in tidal areas, and avoid development in high flood risk areas. It also makes clear that flood management will be required to facilitate development in coastal towns (including Bridlington).

The applicant has also undertaken a Flood Risk Assessment; the development area is located in Flood Risk Zone 1. The assessment concluded that the flood risk is low. The local authority will have to take this assessment into consideration when making its decision.

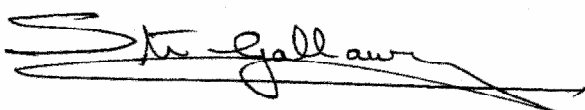
Conclusion

Given the issues set out above, the Assembly offers the following comments that:

- The Assembly SUPPORTS in principle the application, provided that the local planning authority is satisfied that the development will not significantly harm Bridlington's function as a Principal Town.
- However, the Assembly would encourage the local authority to:
 - Require at least 10% of the energy to be used in the development to come from on-site renewable energy sources.
 - To take into account the Flood Risk Assessment
 - Ensure that there is adequate public transport provision and provision for walking and cycling to meet the accessibility criteria of current and draft RSS.
 - Ensure car-parking standards are line with the RSS.

If you have any queries about these points, please do not hesitate to contact Andy Haigh on 01924 331601.

Yours sincerely



Stephen Galloway
Chair, Regional Planning Board
Yorkshire and Humber Assembly