

Drivers Jonas Deloitte.

Statement of Paul Newton MRTPI  
& John Chambers FRICS PPISVA

Rebuttal Statement

John Charles Weir MRICS MRTPI



- 1.1 This Statement has been prepared by John Weir and rebuts certain points made by Messrs Newton and Chambers in documents dated on or around 4 May 2012. References to paragraph numbers are to those contained within Messrs Newton and Chambers' documents.
- 1.2 In my opinion, neither document provides any sound basis for taking a different view other than that which I have set out previously in my ED53 Proof.

## Statement of Paul Newton

### Paragraphs 3.5, 3.8, 3.9 and 3.10

- 1.3 The development appraisals carried out to date demonstrate that certain parcels are more viable (and therefore valuable) than others. The Harbour Top is one of those parcels, as is the proposed unit shop parcel (1C). Other parcels are less viable (or valuable) and, as with many developments on the scale proposed, some elements are loss making. In addition, there are costs associated with the development and its infrastructure which must be borne by the ultimate developer(s) or the Council, as appropriate. The overall development is not anticipated to be self sustaining, that is to say that subsidy will be required to deliver the regeneration of Bridlington, via Burlington Parade, however phased.
- 1.4 There is no inconsistency within the Council with regard to the importance of the Harbour Top from a value enhancing (and generating perspective). The difference between paragraph 36 of ED19f and my evidence (paragraphs 5.33, 5.34, 5.53 and 5.57) is one of approach to phasing. Various scenarios can be construed with regard to how the development might be phased – it would be unusual for this to be considered (or even known) in explicit detail at plan-making stage.
- 1.5 If, say, a 'self contained' approach to phasing the scheme is taken then the principles of ED19f could apply – where the values generated by the Harbour Top development are recycled within that phase of the development, to cover costs arising, and not used to cross-fund other costs elsewhere within Burlington Parade. Conversely, an approach could be adopted (as I have suggested) whereby dependant upon the timing of cost vs. receipt, and the need for funds throughout the development as a whole, surplus generated from developing the Harbour Top could be used to cross-fund other parcels which, of themselves, do not stand to make a profit.
- 1.6 Mr Newton's point, whilst grasping for inconsistency, is not relevant. The facts are that the Harbour Top will stand to generate positive revenues which other elements of the scheme will not – a not uncommon feature of mixed-use development on this scale. Whether those positive revenues are recycled within, or outwith, that development parcel is of less concern than the fact that without the positive influence on values within Burlington Parade as a whole, the overall deficit attributable to the scheme will grow significantly, a matter of understandable concern to ERYC. For this reason the Harbour Top is justifiably required to deliver Burlington Parade.

### Market Demand & Evidence Base

- 1.7 Given that Mr Newton is a Chartered Town Planner he draws in the expertise of Mr Chambers to provide an overview of the existing and future retail/leisure market within Bridlington.
- 1.8 Before commenting on aspects of Mr Newton's proof, I confirm my agreement with the Council's comments in their Rebuttal to Objectors Papers dated 14 May 2012 at paragraphs 53 to 56.
- 1.9 I comment as follows on Mr Newton's proof:

## Paragraph 4.4

1.10 Mr Chambers acknowledges that interest does exist from one hotel operator (he cites Premier Inn) for a hotel in Bridlington.

## Paragraph 4.5

1.11 I would agree with Mr Chambers that there is unlikely to be interest in traditional 'bucket and spade' type hotels of the converted Victorian villa type. The decline in this form of accommodation means that Bridlington must now aspire to a modern form of hotel development, if it is to capture and retain spend from the modern tourist market.

## Paragraph 4.6

1.12 Mr Chambers advocates an alternative site for the siting of a 'quality hotel' in the vicinity of the Harbour Top on the site of the existing boating pool (an extant leisure facility). In addition, Appendix 4 to Mr C J Wright's letter to Ms Strachan of 9 May 2012 proposes a revised TC3 to include "...a full service hotel linked to the Spa". It appears to me therefore that Mr Chambers can see the merits of a new hotel in Bridlington.

## Paragraph 4.7

1.13 I don't understand this statement. Preceding paragraphs have a) identified demand for a hotel in Bridlington, according to Mr Chambers research and b) suggested a new and apparently entirely suitable location for a 'quality hotel'. Mr Chambers concludes however that there is no hotel demand.

## Paragraph 5.4

1.14 The housing market across the UK is fragile and has been so since early 2008. Mr Chambers is correct when he states that interest levels are muted – this is consistent with the national picture. However, the AAP is a development plan for the period to 2021. That leaves some 9 years hence for the economy to recover and along with it, the housing market in the UK and Bridlington. It is entirely without vision to suggest that muted market conditions now will not improve to the extent that residential should play a meaningful part in the mixed use development of the Harbour Top during the plan period.

## Paragraphs 6.1 and 6.4

1.15 It is envisaged that the commercial space (excepting the hotel) within the Harbour Top will be predominantly leisure, rather than retail use.

## Paragraph 6.6

1.16 Mr Chambers notes:

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“...I do not consider that a hotel and residential led development would be sufficient major anchors do I believe that shoppers will walk from the relocated Tesco to the Harbour Top due to the distance and time involved”.

1.17 I agree with the first part of Mr Chambers' statement – which is why a quantum of leisure-based floorspace is proposed at the Harbour Top. His point about shoppers illustrates a failure to grasp the concept of an anchor. The purpose of having three nodes, the established retail core, the retail shop scheme and the Harbour Top is not to promote the notion that the developed Harbour Top will somehow mechanically propel shoppers from Tesco towards the Harbour. Instead, it is to recognise that if the town as a whole is to function, the harbour must play its part in that and attract a pedestrian flow from elsewhere within the town. That flow of pedestrians could comprise inhabitants of the town or visitors.

## Paragraph 7.2

1.18 Mr Chambers states:

“In my view, were the Burlington Parade not to come forward, it would have nothing to do with the Harbour Top not being developed but could well be because Tesco’s new store will take the shopper further from the retail core of the town centre.”

1.19 Mr Chambers helpfully corroborates my own view at paragraph 5.16 (v) where I state:

“...without the Harbour Top, the town will...Fail to improve the town centre and pose significant risk to the established retail core. Without the Harbour Top creating a third anchor for the town centre, the retail circuit risks being skewed to the west of the established retail core. Conversely, the existence of the Harbour Top in (sic) a desirable counterbalance to this by influencing the overall appeal and attractiveness of the town as a whole.”

1.20 We are therefore agreed that whilst the redevelopment of the Coach Park site (1A) and Unit Shops site (1C) would be a desirable outcome, caution needs to be exercised to protect the health of the town as a whole.

## Paragraph 7.3 and 7.4

1.21 These paragraphs are helpful as they illustrate a number of key features about investment in Bridlington to date:

1. It has been small in scale and piecemeal – resulting in opportunistic and unplanned small scale development which does little for the quality of the town centre offer as a whole;
2. Investment has been largely without vision and lacking in aspiration;
3. The example of retail investment, cited in paragraph 7.3, is not, of itself sufficient to demonstrate robust market confidence in Bridlington or to show that the restructuring proposal by the AAP is not required;
4. Tesco is a potential risk to the town, as evidenced by Mr Chambers, without the counterbalance of the Harbour Top development;
5. Irrespective of the Lords Feoffees investment, past, present and proposed, the health of Bridlington is weak and that trend is unlikely to improve without intervention of the nature and scale proposed by the AAP.

## Conclusions

1.22 I comment on Mr Chambers’ conclusions as follows:

- i) I cannot comment on the BHC’s position;
- ii) I have not been asked to demonstrate that the uses proposed will ‘generate sufficient funds’. In the absence of this information therefore, I query how Mr Chambers has formulated his ‘serious doubts’;
- iii) Mr Chambers has identified interest from a hotelier in Bridlington and gone as far as to suggest an alternative site. In addition Appendix 4 to Mr CJ Wright’s letter to Ms Strachan of 9 May 2012 proposes a revised TC3 to include “...a full service hotel linked to the Spa”. It appears to me therefore that Mr Chambers can see the merits of a new hotel in Bridlington;
- iv) The development of the Harbour Top will complete Bridlington’s offer. It will add a level of appeal and interest which cannot be replicated by the partial implementation of the AAP.
- v) I have commented previously on the danger and risks associated with taking the view that investment by the parties named will constitute effective regeneration and a step change in the approach to the development of Bridlington. In my view, it will not.

## Response to the Inspector's Post Hearing Note

1.23 I comment finally on Mr Newton's assertions at paragraphs 5.3 and 5.4.

### Paragraph 5.3

1.24 Evidence has been provided as Mr Newton terms it "improved functional connection", would be a catalyst but not simply for the success of Burlington Parade and rather for the success of the town as a whole, post AAP implementation. Mr Chambers acknowledges the risks associated with implementing part only (Tesco's) at paragraph 7.2 of his Proof.

1.25 I have not suggested that existing interests in the town will not continue to invest. I have suggested that these investments, of themselves, will not be sufficient and risk introducing an unbalanced approach to investment in Bridlington which the Harbour Top element seeks to counter.

1.26 I have said that the exclusion of the Harbour Top from Burlington Parade will be damaging to Bridlington. See paragraphs 5.45 -5.47 of ED53.

### Paragraph 5.4

1.27 Mr Chambers promotes a site adjacent to the Spa for hotel development. Why would he do this if he felt a hotel was not required in Bridlington? He also identifies demand. Therefore, if the BHC's witness has identified demand in the form of Premier Inn and is looking for a suitable location to site a hotel within the town, I would suggest that the justification for the hotel is neither tentative nor uncertain.

**John Charles Weir**  
**15 May 2012**



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