



BRIDLINGTON TOWN COUNCIL

Town Centre Area Action Plan (AAP) Inquiry

Inclusion of Harbour Top in AAP

**The Council's response to documentation produced by
the East Riding Yorkshire Council (ERYC) and rebuttal of proposals therein.**

MAY 2012

BRIDLINGTON TOWN COUNCIL



Town Centre Area Action Plan, Harbour Top

The Council's response to the numerous papers released by the ERYC on 20/4/12 and rebuttal of the proposals therein.

The Council has reviewed the various papers, hampered by having had to separate the wheat from the chaff, of which there is an abundance. It is not possible, in the time available, to comment on all points in detail. The Council will be pleased to receive a copy of the minutes of whichever ERYC Committee, after detailed consideration, approved all of the of these presented papers.

It would be helpful if the Inspector would use her powers to summon the Chairman of the subject committee to explain how a massive building project on the Harbour Top, together with the extinguishing of the priceless harbour public view, would benefit the residents and attract more visitors to the town and conform with the National Planning Framework, Section 12.

ED50

3.iv. (ditto 6.Vii and 12.i) How has this conclusion been reached without detailed drawings and the opinion of a fully qualified Listed Building Control Assessor?

8 & 9 all. These sections are irrelevant as they deal with a Marina only.

10 iii. (ditto 12.iii) To increase vistas of the Harbour it is proposed to obliterate the public, existing views from South Cliff Road.

13 d. "All the stakeholders do not have to be committed". The Bridlington Town Council (BTC) being a major stakeholder representing the electorate of Bridlington, one would expect to take it's view into account. Not to mention the Bridlington Harbour Commissioners (BHC), another major stakeholder.

Appendix 1 Brid TC3 2 d)

At the Yorkshire Marina Inquiry, a number of consultants reported that no hotel chain was interested in an hotel in Bridlington because it would not attract adequate occupation 12 months of the year. Whom do the ERYC have in mind? The Council would welcome a high-class hotel in the town but, being realistic, this is unlikely. In the Yorkshire Marina Inquiry Report, the Inspector ruled that there was no case for shops, offices, commercial or leisure facilities at the Harbour Top. Does that extensive Inquiry Report count for nothing?

ED51

This paper consists of a CV for Mr Michael Kent and a programme for marina development. The only reference to the Harbour Top being essential for Burlington Parade is a reference in 3.ii to ED53.

ED51 - Appendix A

This paper lays out a programme (with illustrations) for the development of a Marina. There is no mention that this overall development is essential to be included in Burlington Parade.

ED52

The papers consists of a CV of Mr Bill Schlegel, the trashing of the Harbour Commissioners proposal for an in-harbour marina and a programme for the development of a Marina. This suggests that the Commissioners are not competent. The Council fully supports the BHC's proposal for an in harbour marina. This would cause much less disruption than the ERYC's proposal and is unlikely to include 200 housing units. In 3 iv it states the Harbour Top is essential to the AAP's positive (inflexible) strategy. There is no evidence that it should be part of Burlington Parade, but does indicate that one should refer to ED53 for the reasons.

ED53

Almost a replica of ED50, 51 and 52. The main point being that it is essential to “anchor” Burlington Parade at both ends, contending that without an “anchor” at the Harbour Top, visitors will be without guidance as to where to walk. This is, of course, if they leave the “anchor” at the proposed Tesco Super Store with its three hour free car-park and the multi-shop area of the proposed Plaza, both of which will have the effect of draining the town centre shops of customers.

The Harbour Top is already the “anchor” of the harbour; any development should be in total sympathy with it. It is most doubtful that a block of flats and a hotel would enhance the harbour's setting or efficiency, but would wipe out one of the most attractive public views in Bridlington, from South Cliff Road.

Section 5.50 is mainly supposition and one person's opinion. References to the Gypsy Race ignore the prediction of Global Warming bringing more frequent torrential rain and the discovery that, under Bridge Street, there are numerous public conduits. It is surprising that, as stated in *iv*, it required a survey to establish the axiom that dwellings with sea-views command a high premium and that a retirement complex with no sea-view commands much less of a premium.

A case for including the Harbour Top with the Burlington Parade has not been made.

ED54 - Bridlington Quay Conservation Area Character Assessment (Draft)

This paper deals with the whole Harbour and there is strong bias towards favouring the AAP. There is no evidence presented that obscuring the harbour from South Cliff Road will enhance the setting of the Harbour.

The Council has no knowledge of traffic noise from South Cliff Road as being problem, most of any noise is dissipated inland by the almost constant, brisk east wind off the North Sea. If there were a noise problem, then ERYC should be advised to remove the designated coach dwell/drop off points from the harbour top. This would go some way to reducing the so-called problem.

The idea of integrating the shopping with the harbour area appears to be supported, ignoring the fact that shoppers concentrate on selecting purchases when shopping and, when spent, retire to the tranquillity of the harbour side to relax. Only a visibly impaired visitor would fail to locate the Harbour. The proposal to demolish certain historic Edwardian buildings in Bridge Street receives no comment as to the effect on the conservation and enhancement of the street.

ED55 (Draft)

Most of this paper deals with the effect of a marina on the listed harbour, thus concentrating on the Harbour Top :-

5.5. Buildings will close off the view from South Cliff Road. This will cause “less than substantial harm”. The Council considers that the harm would be total.

5.8 View from the north Pier east. Viewers will be confronted by a mass of buildings, totally out of harmony with the ancient harbour. The setting of the harbour would be substantially and permanently harmed .

9.0 Views from South Cliff Gardens. “Buildings will need to be designed to allow long views between the structures”. If this is the case then seats will have to be arranged to take advantage of the gaps between structures. The wide, open vista of the sea, sky and harbour will be lost from public view forever. Yet this is rated as “less than substantial harm”. A complete distortion of the truth.

The text of ED55 is more or less a replication of all the other papers, so does not merit further comment.

ED55 - Appendix 1. This reminds us of the listed parts of the harbour.

English Heritage

After a protracted preamble this paper sets out in:-

1.1.1 That, as there are no detailed drawings available, “It is difficult to ascertain, precisely, what effect the Harbour Top and Marina developments might have upon those elements which contribute to the significance of these structures”

1.1.2 Nonetheless, without the required details, concludes that harm caused will be "less than substantial." Without the required details it is impossible to make such an assessment.

2.2.1 Picks up the comments of the Listed Building Control assessor at the Yorkshire Marina Inquiry, but does not address her advice that any future development to the listed harbour should be “called in” to the Secretary of State.

2.2.2 This mentions the especially striking views from South Cliff Road, ignoring the fact that it is intended to extinguish this special view with high buildings. This paper in no way endorses ERYC's stance that the proposed Harbour Top development will not harm the setting of the listed piers. It indicates a bias towards ERYC's agenda by using the description “Less than substantial harm” that is unsubstantiated and therefore nothing more than wishful thinking. This paper is unreliable and should be discounted.

It is remarkable that all the numerous consultants have reached the same conclusions. One could be forgiven for wondering if, when the various consultants were engaged, ERYC gave them a list of required conclusions.

Summary

The Town Council has a duty of care to the current and future residents of Bridlington. It has attempted to exercise this duty in opposing what it sees as an AAP that is detrimental to the Town.

The Council is as keen as anyone to improve the ambience and prospects of Bridlington. However, it fears that the piecemeal (mostly unnecessary) proposals will, given the Government's predicted long-term financial restraints, blight the town by turning its centre into a building site for many years to come.

The Council has made various recommendations that would improve the town at far less expense and disruption than this AAP. These proposals are set out in the responses to the Draft AAP published in October 2008 and responded to by the ERYC in October 2010, together with the final AAP. Most of the numerous suggestions by all parties to the Draft AAP were responded to by the ERYC as "the Council proposes no change". These responses should become an Inquiry document.

Conclusion

ERYC's failure to produce any details of what their proposed development of the Harbour Top will actually look like - no elevations plan or even a basic 'artists impression' have been provided - is reason enough to reject it in principle.

If a development were to be approved in principle, there is no way of knowing what might actually end up being built. ERYC's description of "something between 5 and 7 storeys high" is so vague that not only would the treasured view across the harbour be lost, there is not telling what potential monstrosity might obscure it.

The case for developing the Harbour Top as an "anchor" for Burlington Parade has not been made. Bridlington does not wish to have the Jewel in its Crown despoiled.

QED.

4th May 2012