

The following is the response to the ERYC additional submission to the AAP inquiry by Mr G Pickering of Argham grange Grindale Bridlington East Yorkshire. Former ERYC Councillor for Bridlington South Ward.

9th May 2012

The Council have set out a principle that market forces have not regenerated Bridlington therefore their proposals are necessary. This may be an argument for supportive intervention but it is a considerable stretch to use this argument in justification of drastic wholesale redevelopment.

This argument has invalid logic along the lines of *“Something must be done, this is something, therefore this must be done”*. As the Council has not in the past attempted to use any of the economic stimuli that were and are available to them- such as simplified planning zones, design coding, business rate relief. They have now worked with Business, partners and stake holders to stimulate growth through for example rent initiatives There has been no marketing of the economic opportunity and no central vision for the existing town centre. There has been no attempt to improve parking and lower parking fees significantly to benefit the local economy and have themselves relocated Council services and jobs to Beverley damaging the local economy. In short the Councils failure to use basic and simple economic levers to stimulate the exiting market is not a justification for condemning its failure and of for radical redevelopment proposals.

The radical development solution is as yet undeliverable and is not supported by stakeholders. There is no business plan which demonstrated how this development can be delivered and it seems to rely on the market switching back to sustain retail based regeneration. Those conditions are at best may years in the future. The retail boom spawned this approach is not cyclic but a response to unique economic, demographic and cultural circumstances we can not even rely on to reoccur. Such booms are transitory and can not provide sustained regeneration as the current decline in those areas that underwent retail led regeneration demonstrates.

The Council recognised that the economy needed to deliver this plan will not be in place until well into its lifespan of the plan. It is unsound to produce a time limited development plan for circumstances that do not exist and may never exist. The test for soundness is a plan that can delivered within a reasonable timeframe.

The proposed AAP fails to deal with the development needs within Bridlington between adoption and the hoped for retail and speculative development recovery on which it depends.

The Council's plan is inflexible with each part reliant on another. It is in effect a House of Cards. The Council has confirmed during the inquiry that there is no flexibility and that failure of any part will result in failure of the whole . The response would be to produce an alternative. This inherent inflexibility makes the plan unsound, it forces Council force themselves into a position where defend the minutia of the plan in opposing any development which is even slight at variant with its proposals. This will restrict development which is not in accordance with the plan and has already been demonstrated by such as the Lord's car park proposal. This prescriptive- preserved site principal is a deterrent to private investment and highly damaging to the local economy. The mega development approach will require a partner developer leaving little or no scope for natural regeneration through local entrepreneurs. The rigidity of the plan, lack of small scale local investment opportunity alongside the Council's presumptive land acquisition policy has already blighted large swathes of the town and this will continue if the AAP in its present form is adopted. There is a desperate need for clear planning guidance but this plan is so inconstant with the measures of soundness that reconsideration is the least damaging option.

The Councils retail justification for this plan is now out of date. There are new major development offers such as the 17+ acre Flemingate development in Beverley

<http://www.google.co.uk/url?sa=t&rct=j&q=flemingate%20development%20brief&source=web&cd=1&ved=0CFMQFjAA&url=http%3A%2F%2Fwww2.eastriding.gov.uk%2FEasySiteWeb%2FGatewayLink.aspx%3Fallid%3D98200&ei=MziqT5-zEaXk4QTBvPi8CQ&usq=AFQjCNFFU6t6qOWDjh56U5oHfhmc9Xxsxw&cad=rja>

and the York Community Stadium proposals. <http://www.yorkcommunitystadium.com/> Yet there Regional stakeholder interest does not seem to be evident and the competitive pressures from adjacent centres have not been included in the revision. For example the views of the Local Economic Partnerships are not clear. The new regional draws would detract significantly from the Councils founding principal of retaining spend in Bridlington and yet do not seem to be considered in an update on the justification.

The plan justification is in itself unbalanced it failed to take any account of the numerous studies and reports into regeneration and advice on place making which demonstrate that regeneration which is based on large scale development wiping away existing infrastructure and without strong natural links with existing centres are highly damaging. The Council's consultant's own development at St Stevens in Hull is an example of the detrimental effects of such development on surrounding areas. They have not given adequate consideration to the secondary effects of their proposed plan. Particularly in relation to the old town and the existing town centre.

The plan does not take into account the new national Development Framework in particular the need for neighbourhood planning and in ignoring neighbourhood concerns is contrary to the new planning advice

The plan still lacks the economic stimulus and support instead following a principal that re-development of the build environment will spontaneously bring about regeneration. This has been demonstrated to be a false presumption in many towns and cities and is not supported by Government advice on regeneration.

The Council had placed much emphasis on their 'dumbbell' principal as the guiding rationale of the plan. They have used a number of lengthy and expensive reports in justification of this and to rebuff objections relating to the need to maintain the health and vitality of the existing town centre. The Council have actively opposed development which is contrary to their theory. but now refer to a "Three Node Circuit" which is presumably in response to legitimate criticism of the dumbbell approach.

The changed from a dumbbell to a three node circuit indicates that the Council must have accepted the arguments relating to the detrimental effect of the plan on the existing retail and that the criticism is valid. Otherwise they would not have made the change but included further justification for their dumbbell in their lengthy additional submission.

Regardless of any acknowledgement in supportive documentation, the plan itself still does not address this issue as the proposals plan and policies remain relatively unchanged and do tally with the new rhetoric.

The Council's justification is stretched beyond credibility to appear to take account of objection without any significant change to the plan. This is now very much a square peg in a round hole.

Whilst the Council's acknowledgement of the needs of the existing retail centre and welcome this change is not one which is addressed in policy and the necessary vision for an alternate economic focus of the existing town centre is still not provided. Nor is the economic stimulus in support policy addressed alongside the planning policy. Damaging policies of contraction and converting shops and guest houses to flats remain.

The Council has paid lip service to the objections raised and have made changes to the justification for the plan in order to accommodate them but without full understanding or providing the necessary proposals and policy changes to deliver on the revisions. The change in language in the additional reports can therefore be seen a little more than rhetoric, an attempt to appease whilst continuing as before. This is disingenuous and does not produce a robust or meaningful policy document which the Bridlington residents can have any confidence.

The Council has now submitted a significant bulk of additional information to the inquiry. The fact that only those who objected to the original proposals have been consulted is of concern. Any significant changes do need wider consultation. Particularly as those content with previous proposal may no longer be content with the revisions. The Council's evidence on consultation which has already been questioned as leading and biased but has been used to demonstrate support by default can not be sustained in relation to the vast amount of additional evidence.

However despite numerous reports the argument is no more compelling and I am at a loss to see how the Council has addressed the concerns raised during the inquiry.

The new National Planning Framework is now in force. Previous submissions during the inquiry that the AAP was over complicated, burdensome, difficult to understand and out of step with the Government's requirements for simplified planning documents were dismissed at the time as the framework had not yet been enforced. The AAP now has to be assessed in the light of the new framework and the verbose complicated structure of the document is now contrary to advice.

This is a clear case of a plan so long in the gestation that the world has moved past it before it can be brought into being. No amount of remedial work can save it or make it relevant to current circumstances of government guidance. It now sets out a vision for the future which belongs to a parallel universe and which the Council can no longer deliver. This plan is clearly unsound.

The Council's consultation and presentation of their dumbbell proposals were misleading, after much questioning, I as a councillor, and many others understood the twin anchors would be the existing and extended town centres. With links between them. I was astounded when the Council revealed at the inquiry that the Anchors were the new shopping centre matched with the new development on the harbour top -completely bypassing the existing town centre. Assurances of increased footfall in the town centre which would support the disadvantaged businesses can not be relied upon.

The concerns over the existing town centre and the old town are extremely pertinent. Both these areas are promoted in the Town Charter a document the Council have selectively used in justification and to demonstrate stakeholder approval of their proposals but which sets out a vision contrary to what is proposed. This raises serious questions as to the veracity of the Council's claim for support for their proposals and of the plan development progression.

The plan seeks to develop the harbour top as the second draw. This argument lacks rigour the harbour and marina are already are in themselves the draw for tourism. The added retail is secondary and can not be justified as the principal anchor.

The AAP originally separated the tourism and the retail as justification of the new shopping centre. ED 53 1.6 now reverses that giving the opposite argument for the justification for acquiring the Harbour Top stating "*The secret to Bridlington's distinctiveness lies in its seafront and the connection of that seafront to the new Primary Shopping Area and vice versa*"

Yet the AAP sets out policy for the Burlington parade and contraction of the existing town centre planned move away from the seafront purposefully to separate the retail from recreation. In addition the Council has approved development along the Esplanade that physically separates the town centre from the seafront.

The Council's plan is inconsistent in justification seeking separation of tourism and retail within the existing town centre to justify the Burlington Parade and a combination of tourism and retail to justify the twin anchor concept and acquisition of the Harbour Top.

The idea that this development would benefit the existing town is unsound. The harbour top anchor remote from it with no links to it. Has the development been of the harbour side and included redevelopment of the harbours northern edge along Prince Street and Queen Street the Councils claims could be justified. The fact that it does not demonstrate that the harbour top development is only establishing an economically viable development for an investor in the marina.

In ED 53 the Council now set out three critical functions for the harbour top development

It is argued that the harbour is the natural conclusion of the proposed Gypsy race corridor . However The Council previously argued that The Gypsy Race corridor is not the Councils proposed retail circuit route which is Quay Road / Prospect Street / Manor Street which terminates not at the harbour top but at Chapel Street / Queen Street. Within what the 'historical retail pitch' The Council's own criteria in linking the Harbour to the retail lead to the conclusion that the natural harbour development would be Queen Street.

Indeed in 1.8 of ED 53 refers the established shopping core turning its back on the harbour and the lack of links. The only point at which this is not the case is the existing harbour top where the proposed development will complete the physical barrier between the harbour and the town.

If opening up the harbour and creating links with the established centre then this is further indication that the natural development focus is Queen Street extending to Bridge Street and Prince Street. The Plan already seeks to remove a part of Bridge Street for the Gypsy Race link and so it can not be argued that similar redevelopment can not occur along the north side of the harbour.

The second critical function is that the development of the Harbour Top provides reason for visitors to come to Bridlington in the first place. This is an extravagant claim as the development is not envisaged by the Council as a tourism draw but as a retail anchor. This claim could possibly be made of the marina but not of associated development. The claim is inconsistent with overall tenet of the AAP in its objective of lessening the dependence on tourism and retaining local spend.

The final critical function is stated to be

“Completing an essential ‘three-node’ circuit of the town, to include the unit shop scheme, the historic retail pitch and the harbour, with interlinking desire lines for pedestrians across the town.”

The plan at 15.13 clearly shows the separation of the historic retail centre and the proposed anchor nodes and links are not natural flows or even work together.

None of the ‘critical functions’ provide a compelling, sustainable or sound argument.

If the purpose of developing the harbour top is the anchor draw rather than to sweeten the offer to a developer then the Council have no need to acquire the land and can work with the landowning stake holder for them to develop the site along a joint vision and to an agreed design code./ development brief. At earlier stages of the enquiry the Council stated that there was no need for the harbour top development in the funding of other developments but now confirm that *“ The financial contribution to the viability of the wider Burlington Parade scheme is also considered as part of this Proof. The Harbour Top, along with the unit shop scheme (1C) are significant contributors of value in cross-funding other elements of Burlington Parade. ED 53 1.9”*

The Council has been accused as acting as a dodgy developer. Forming policy not on sound planning grounds but in order to facilitate their own development.

The harbour top proposals and omissions in logical response to their own justification do nothing dispel this perception.

It is evidence from the inconsistencies in justification and within the deviation in the plan through its progression from the original Town Charter that this is not a coherent logical solution to Bridlington’s regeneration but a plan to create artificial viability for an edge of town shopping centre and a marina hotel with the effect of disadvantaging other areas of the town and business sectors.

The proposal remains inflexible with additional report stating categorically that the Harbour is essential to the Burlington Parade development. Therefore any subsequent detailed planning issues relating to the harbour would undermine the plan there is no ‘Plan B’

The Council now refer to the three node circuit of the town adding in the historical retail pitch. Their previous presentation was for a two node circuit between with the anchors of the harbour and Burlington Parade. Surely then the two node circuit between Burlington Arcade and historical retail pitch. Excluding the harbour top would be as viable and justified under the Councils own evidence.