



Northumberland
County Council

REBUTTAL EVIDENCE

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TOWN AND COUNTRY PLANNING ACT 1990

APPEAL BY DEVONPORT ESTATES

**CONSTRUCTION OF A PUBLICLY ACCESSIBLE LANDMARK AND
ASSOCIATED DEVELOPMENT**

ON

**LAND AT COLD LAW, STIDDLEHILL COMMON, NEAR RIDSDALE,
RAY ESTATE, NORTHUMBERLAND**

PLANNING INSPECTORATE REF: APP/P2935/W/20/3244389

LOCAL PLANNING AUTHORITY REF: 19/00247/FUL

1. INTRODUCTION

- 1.1 My proof of evidence (CD J.2) covers planning considerations. It includes a section dealing with the economic benefits claimed by the Appellant. That discussion was based on the Appellant's submissions for the original application (19/00247/FUL) and in particular for the second application (20/00698/FUL). The Appellant's information was contained mainly in the Economic Impact Report prepared by ERS (February 2020) (CD D.5) and the Visitor Strategy prepared by Ethical Partnership and Simon Hitchins (February 2020) (CD D.3).
- 1.2 Mr Creedy has submitted two documents as appendices (CD I.3.1) that I saw for the first time after the exchange of proofs despite asking for copies of them a fortnight earlier so I could take them into account in preparing my evidence. The documents are an Economic Impact Assessment (February 2021) prepared by Frontline Consulting and a refreshed Visitor Strategy (February 2021) prepared by Ethical Partnership. The main purpose of this rebuttal evidence therefore is to discuss the new material relating to economic benefits. I also deal with some of Mr Creedy's conclusions regarding compliance with local and national planning policy.
- 1.3 Before dealing with this new material I note that at paragraphs 8.3.1 and 8.3.2 Mr Creedy says that he understands that a consideration of economic benefits does not form part of the Council's case. I do not know how Mr Creedy has reached this understanding. Clearly in order to deal with the planning balance and whether the proposal represents sustainable development, it is necessary to consider the various environmental, social and economic benefits associated with the development. That understanding also does not accord with the Statement of Common Ground (CD L.1 at paragraph 2.7.2).
- 1.4 My comments are set out under the following headings.
 - a. Comparable Sculptures to the Proposed Development.
 - b. The Visitor Strategies.
 - c. The Economic Assessment Reports

2. COMPARABLE STRUCTURES TO THE PROPOSED DEVELOPMENT

2.1 Mr Creedy (paragraphs 8.3.4 - 8.3.6) refers to the review of 'comparable' open-air art installations across the UK that is set out in Section 2.2 of Frontline's Economic Impact Assessment. He states (paragraph 8.3.6) that the review provides convincing evidence of the economic benefits that the Landmark will bring. However, the Frontline report states that: '*There are no directly equivalent comparators to this specific art project*' (underlining added) and recognises that caution needs to be exercised in reviewing the findings of other art projects

2.2. I consider that his comparability of the other examples with the appeal proposal is thin. In particular most are close to major urban areas / major roads (one is not even built). None are in relatively remote locations like Cold Law with limited car parking provision and visitor facilities.

- The Angel of the North is located on the southern gateway edge of Gateshead adjacent to a motorway.
- "The Kelpies" was created alongside an existing lock-gate attraction, adjacent to a motorway and on the fringes of an urban area. Commercial pressures have subsequently resulted in a visitor centre being created to serve the Kelpies, a type of addition that would not be appropriate in a remote location, such as Cold Law.
- The Weeping Window, Grommit Unleashed and Dismaland were all temporary exhibitions located close to urban areas and major roads.
- The Gretna Landmark has not been built so the figures quoted are just aspirational.
- The Yorkshire Sculpture Park located close to M1 Junction 38 extends to over 200 hectares and includes a series of indoor galleries and large visitor centre.

2.3 I conclude that it is not reasonable to envisage that the scale of economic benefits resulting from these developments would similarly result from the proposed Landmark.

3. THE VISITOR STRATEGIES

3.1 Ethical Partnership prepared both the original (CD D.3) and the updated (CD 1.3.1) visitor strategy. The latter includes new material on the implications of the pandemic but presents the same 'expected visitor profile' as the original report. It is not possible to verify the accuracy of this profile - including the predictions for such aspects as type of visitor, age, mode of travel, length of stay, home base - as it is derived from '*published sources*' and '*visitor trends and research*' (paragraph 3.3.1) whose sources are not stated. Some of the profiles presented seem surprising. So, for example, it is expected that whilst 82% might be day visitors (Figure 3.6), only 14% of visitors are expected to live in Northumberland / North East (Figure 3.5). I would have expected that, certainly in the early years, a much higher proportion of visitors would be from Northumberland / North East with consequential implications for reducing the economic benefit that might be generated.

3.2 Comparing the two reports, a number of detailed changes have been made including:

- CD D.3 paragraph 1.4.2 stated: '*The landscape is set on a slope and therefore vehicles using the car park have the potential to be visible in the landscape*'. This has been omitted from the new report (CD I.3.1).
- CD D.3 paragraph 2.2.2 stated that '*perhaps 70% of (the target of 25,000 visitors by year 3) are likely to be existing visitors / tourists to Northumberland who have extended their stay or added the EL to their itinerary*'. Whilst the target of 25,000 is the same in CD I.3.1, the other words have been omitted.
- CD D.3 paragraph 2.2.2 also stated as an ambition: '*The average total spend of visitors per visit (including day and overnight visitors) will be £50*', but the ambition in CD I.3.1 is '*To maximise the average total spend of visitors per visit (including day and overnight visitors)*'. The effect of this has been to significantly increase the estimated economic benefits attributed to the monument.

- CD D.3 paragraph 3.3.1 in the original report stated: *‘Although there are no major cycle routes within close proximity to the site’*, but this has been omitted from CD I.3.1 paragraph 3.5.1.
- CD D.3 paragraph 3.3.2 stated: *‘Cyclists tend to find the A68 to be uncomfortably fast and busy’*, but this has been omitted from CD I.3.1 paragraph 3.5.2.
- CD D.3 paragraph 3.16.1 stated: *‘However, given that no public toilets are to be provided this may limit the number of such (people with mobility limitations) visits’*, but this has been omitted from CD I.3.1 paragraph 3.17.1.
- CD D.3 paragraph 4.2.1 stated: *‘There is a limited number and range of accommodation and facilities within 5km of the site’*, but this has been omitted from I.3.1 paragraph 4.2.

3.3 I consider that the content that has been omitted was relevant to the assessment of economic benefits and generally well founded. These changes do not appear to have resulted from the availability of new data.

4. THE ECONOMIC ASSESSMENT REPORTS

4.1 It is important to note that the Frontline report within CD I.3.1 uses as its basis the same expected visitor profile as the original ERS report (CD D.5), but that despite this it reaches very different and increased estimates of potential economic benefit from the Landmark.

4.2 The Frontline report within CD I.3.1 concludes that at the mid-point of its estimates the monument will result in £2.99m pa visitor expenditure, 64 fte jobs and £1.8m pa GVA. CD D.5 concluded that the monument would generate only £4.53m visitor expenditure over its first 10 years, only 8.12 fte jobs and only £1.43m GVA over its first 10 years. I appreciate that the two reports have used different methodologies to estimate economic effects but it is not clear to me why the claimed economic benefits should be so different, when the two reports use the same visitor profile.

4.3 One of Frontline’s arguments is that the monument would play an important role in the recovery of tourism in Northumberland following the pandemic.

The report considers that more people will be holidaying in the UK which it refers to as a 'staycation boom'. The report states that the monument '*has the potential to play a significant role*' (page 14) in this boom. The same argument continues with the statement that '*the Elizabeth Landmark would play a new and important role in presenting Northumberland to the 'staycation' market and attract new visitors to region and keep visitors in the area*' page 15). It states '*Elizabeth Landmark has the potential to be a significant attractor to strengthen the destination credentials of the area*' (page 16). It is further claimed that the new sculpture would '*reduce an outflow of local people leaving the area to seek holidays elsewhere in the UK and abroad*' (page 18).

4.4 I consider that these ambitions for the monument are greatly exaggerated and that the Appellant has provided no evidence to suggest it would play such a key role. Such a role for the monument is not borne out by the projections in the visitor survey which anticipate only modest visitor numbers. Whilst a 'staycation boom' is likely in 2021, the monument will not be available to take advantage of it. Even since the Frontline report was written just a month ago, there have been rapid developments in the rollout of the Covid vaccines suggesting that the popularity of overseas holidays may return sooner than previously assumed.

4.5 The calculations of economic benefit within CD I.3.1 appear to attribute all the increased expenditure, GVA and employment to the existence of the monument. So, for example it states '*It is consistent to present the total economic effects of the expenditure of visitors attending the landmark, whether they were purely there to see the Elizabeth Landmark or just 'passing by*' (Section 2). I do not consider that such an approach provides a realistic basis for assessing the economic impact of the monument. There is no assessment of the number of visitors who will be going just to the monument and nowhere else. The methodology used suggests that if these visitors also visit another attraction, then that attraction could also claim the same economic benefits. I do not consider that such an approach provides a realistic assessment of the economic benefits that might result. The economic benefits referred to would have greater credibility if they related to the

additional visitors that the monument might attract but from the information presented it is impossible to say what the additional effect on expenditure, GVA or jobs might result from building the Monument. There is reference similarly at CD I.3.1 page 8 to visitors being attracted to the area for an overnight visit by the monument but this is pure conjecture and nowhere in the visitor survey is there any estimate of how many additional overnight stays in the local area might be generated by the monument.

- 4.6 In section 4.1, Frontline appear to assume that a large number of new visits of between 2 and 3 days (average) will be generated by the monument. In other words, the visitors concerned would be attracted to the County as a result of the Monument and then many of them would build a holiday around that and, presumably visit other attractions in the County. It is more likely, in my opinion, that any visitor (as opposed to residents') expenditure arising from the presence of the Monument is likely to come from people already visiting Northumberland for long-established reasons and that this extra expenditure is likely to be minimal due to the remote location and the limited facilities and spending opportunities in the locality of the Appeal site.
- 4.7 The two reports differ markedly in their estimates of the economic impact of the monument in the local area. ERS stated (at CD D.5 paragraph 4.4) that: *'Unless the Elizabeth Monument encourages new business start-ups (which seems unlikely), there would appear to be a limited number of local businesses capable of benefitting from any expenditure undertaken by visitors to the site'*. Frontline's conclusions could not be more different. They conclude (CD I.3.1 page 15) that: *'A review of other comparable landmarks and sculptures suggests the Elizabeth Landmark's sculpture will be of a scale to attract new visitors, extend stays and spend rates. This in turn will support existing businesses and has the potential to encourage new business start-ups such as food and drink outlets, retail opportunities and other visitor related activities and events'*.
- 4.8 I do not consider that the structures reviewed are comparable to the proposal. Some local businesses may well benefit but the scale of this would be modest, especially given that many, even in the defined local area of 5-miles

radius, are several kilometres from the site and are just as likely to benefit from more general increases in visitor activity and attractions. I consider that the conclusions of the ERS Report (CD D.5) on local economic impact would be very much more likely to be borne out than those produced by Frontline (CD I.3.1) should planning permission be granted and the monument erected.