

## Comment on Genecon BHRR Report

I have had a quick look at this - it looks to me like 'nonsense on stilts'. Just a few points:

1. The argument for the necessity of the site is entirely circular:
  - the number of jobs is what could be fitted on to the the site if fully developed;
  - this number of jobs would produce a cornucopia of wealth;
  - therefore the site must be serviced and made available for development without delay, at almost any cost
2. The whole edifice depends (once again) on attracting inward investment. It is only on this basis that the unique suitability of the North East Bexhill Business Park (NEBBP) site can be argued, because of the ability to accommodate large single development(s). On this depends the low level of displacement and high multipliers. Unfortunately, the location of Hastings/Bexhill means the prospects of attracting such uses against competition from elsewhere in the SE - never good - is now vanishingly small (see current issue of Planning for national effects of such wishful thinking).
3. There is no evidence of the actual level of effective demand for commercial premises - ie take-up. The term 'demand' seems to have been derived from business responses to questions about their desire to expand - a rather different matter!
4. No account has been taken of other ways of meeting actual needs and demands:
  - other greenfield sites in the area (some 30ha in Hastings and Rother, with a take-up of around 0.4ha/yr when last quantified);
  - churn of existing stock (which is how most demand is met throughout the UK); and
  - brownfield regeneration and redevelopment opportunities (which would fit well with local planning policy).
5. These alternatives ought to have been considered in arriving at a view about 'displacement' and 'deadweight':
  - to say (as the report does) that there is no deadweight because without the NEBBP there would be no development of the NEBBP site itself is frankly laughable;
  - the argument for low (20%) displacement depends on 80% of the demand not being met by one or more of these other means. Except in the case of a major inward investment this is highly unlikely (NB the report itself remarks under 'Leakage' that "Hastings and Bexhill are relatively self-contained economies");
  - As previously remarked, the great danger is that piecemeal development for retail or office uses could take such activity out of existing centres.
6. The allocation of the whole £1 billion GVA of the putative workforce to the influence of BHLR is extraordinary, even by the peculiar standards of the rest of this report. Not only does it ignore the economic and market realities noted above, but assigns to BHLR the value all the other inputs - labour, buildings, materials!

On the plus side, I am encouraged by the fact that DfT can be expected to give it short shrift. On the minus side, the possibility of people capable of thinking like this ever coming up with a good plan for regenerating Hastings/Bexhill seems slight.

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