

**Newark and Sherwood District Council
Site Allocations and Development Management DPD Examination in Public**

Day 2
12 December 2012

Statement on behalf of NSK Europe Ltd – Site at Northern Road, Newark

Introduction

1. This statement has been made on behalf of NSK Europe Ltd in respect of the site at Northern Road, Newark, which is recommended for allocation in the Site Allocations Plan under Site Ref: NUA/MU/3.
2. This statement relates to the Inspector's Examination Agenda Matter 4 which raises the following questions
 - Are the detailed requirements for each of the allocations clear and justified and will they ensure delivery within the planned timescale? Have site constraints, viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?
 - Are the locations identified the most appropriate when considered against all reasonable alternatives?

Are the detailed requirements for each of the allocations clear and justified and will they ensure delivery within the planned timescale?

3. In respect of NUA/MU/3, The GVA Grimley 'Newark and Sherwood Retail and Town Centres Study' identifies that future retail need in Newark is based on meeting comparison good retail requirements, and preventing the leakage of bulky goods retail trade out of Newark. As such the identification of the Northern Road site specifically for bulky goods is clear and justified.
4. The evidence predicted a comparison goods capacity increase to 4,911 sq m net by 2019, 15,040 sq m net by 2024 and 18,459 sq m net by 2026 although this has been diminished overall, taking into account the economic slowdown. The identification of the Northern Road site for 10,000 sq m net bulky goods retail floor space is appropriate and deliverable. Taking into account the total comparison goods capacity increase and assuming a 70% gross to net ratio and a floorspace to site ratio of 50%, it is clear that the site is capable of accommodating this provision.
5. As such there is no risk to the delivery of the bulky goods retail element of the scheme within a reasonable timeframe and well within the plan period.

Have site constraints, viability considerations been adequately addressed?

6. The site is not at risk from flooding and highway assessments and ground conditions reports have been carried out as part of the promotion and submitted to the Council as part of the evidence base. The ground conditions survey revealed very limited issues of contamination considering the industrial use of the site and nothing that would prevent development or introduce abnormal development costs. Development of this site would need to be linked in with known highway improvement scheme requirements. In short, there are no significant physical constraints to the

development of the site and no constraints that cannot be readily mitigated. No significant constraints were identified by the assessment of the site against the criteria contained within Spatial Policy 9 of the adopted Core Strategy.

7. Attached to this statement are two indicative master plans which demonstrate the delivery potential of the site both with and without the redevelopment of the existing retail park. These plans have been independently reviewed by commercial agents and bulky goods retail professionals and have been confirmed to be deliverable.
8. The locational advantage of the Northern Road site is that it already contains both employment and bulky goods retail. The proposed mixed use development will result in a unique opportunity for providing sustainable pedestrian and cycle links, from the developed area, directly into the heart of the town, neighbouring employment land and to Northgate Station. Northgate Station is situated within easy walking distance. Direct trains to London take less than 1.5 hours, and direct trains to Newcastle take less than 2 hours. Bus services 1, 1A, S7L and 87 run very frequently from directly outside the site into the town centre with further connecting routes. The potential to provide a pedestrian foot bridge across the railway puts the edge of the site within 625m of the town centre.
9. Over a period of ten years, NSK has engaged with the Council over its requirement to relocate to a purpose built, clean production, manufacturing plant. The work taking place in part of the site today has the potential to employ more people within significantly smaller floorspace and within much more energy efficient buildings. NSK are fully committed to Newark in the long-term. Their requirement and relocation programme is to secure a suitable (green/brown-field) site elsewhere Newark and construct a purpose-built operation, funded through the release of the Northern Road works for mixed use re-development. It seems increasingly likely that, a re-location could see early development within one of the SUE employment areas, ensuring built in sustainability to the town's key growth locations.
10. Over the promotion period, work has been ongoing to ensure that the appropriate mix and balance of uses is commercially viable, realistic and has the potential to generate sufficient value in the site to cover the costs of relocation. NSK has shown great commitment to Newark, and further investment is promised, predicated on the ability of the Newark business to meet future capacity increases, and to self fund its relocation. Both of these targets rely on the allocation as proposed.

Is the boundary of the site appropriate?

11. We note that the allocation includes only the NSK landholding, and does not include the adjacent land to the south comprising of the Abbot and Co works, and the B&Q retail site on the corner of Northern Road and Beacon Hill. We have confirmation from the owner of the Abbot and Co works and other adjoining landowners that they would wish to see adjoining land included as part of a deliverable mixed use redevelopment of the NSK works. Given the mixed use nature of the adjoining land uses, and the potential added benefit in securing a comprehensive mixed use redevelopment of the site, we believe it would be to the wider regeneration benefit of the town to include the adjoining land. We would add however that delivery of the allocation is not reliant on third party land.

Are the locations identified the most appropriate when considered against all reasonable alternatives?

12. The issue of whether there might be an alternative site has been soundly and fully examined by the Council generally through the Allocation DPD process and

specifically through the Additional Sites Consultation Paper March – May 2012. This document assessed 'reasonable alternatives' that had been submitted late in the process. In particular, site reference 2 at Northgate was considered by the Council and subsequently rejected following assessment and public consultation.

13. The Northgate site is the subject of an unresolved planning appeal which proposes 2,215 sq m of unrestricted A1 retail floorspace as part of a speculative scheme of which 1,375 sq m is for convenience retail. The application states that there are 'no committed occupiers'. Submissions to the appeal question the deliverability and suitability of the scheme, which does not segregate service vehicle and customer vehicle movements.
14. The site is identified for allocation as a housing site within the document following a previous grant of planning permission. I understand that there are viability issues relating to the immediate development of the site for housing, hence the current application for speculative retail use, including convenience retail. It is not clear whether the site is unviable if the convenience retail is omitted although it is noted that the Council's retail evidence states that any minor additional convenience retail requirements over the plan period can be met in small scale formats spread through the district.
15. The North Gate site an out of centre location by definition. While the current application describes the site as operating as an edge of centre site, there is no such distinction in planning policy and one out-of-centre site cannot be more sequentially preferable than another. In actual fact, the site is 175m beyond what could be considered as an edge of centre location. As such the site has no locational advantage by definition over NUA/MU/3
16. The North Gate site lies directly adjoining a Conservation Area, which is sensitive to redevelopment on its periphery. Bulky goods retail developments necessitate a large scale format, linear form and circulation and parking provision that does not readily site well in a historic context. The potential for harm to the character and appearance of the Conservation Area is palpable.
17. The extant residential consent for the North Gate site is an appropriate and contextually sensitive development proposal. It will serve to contribute good quality housing in an area of recognised housing need. It has been accounted for in the overall balance of supply in preparing both the Core Strategy and the Site Allocations draft and its loss as a housing site will undermine future delivery of the District's housing growth requirement. It is of little surprise that the site is not currently viable in view of both the flood risk mitigation and the current housing market.
18. In respect of delivery, it is recognised that the level of retail growth provided for in the plan is both skewed to the latter part of the plan period and is predicated on the significant growth of Newark identified through the Core Strategy. There is no imperative to deliver the retail element proposed early in the plan. As such the availability of the Northgate site is of no advantage.