

17 June 2014

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a bright yellow rectangular background.

Sue Hennah
Programme Officer to LDP Hearing
Civic Centre
Newport
NP20 4UR

Paul Williams
E: pjwilliams@savills.com
DL: +44 (0) 2920 368906
F: +44 (0) 2920 368999

12 Windsor Place
Cardiff CF10 3BY
T: +44 (0) 2920 368 920
savills.com

Dear Sue,

2063 Friends Life Company Limited – Newport Retail Park – Hearing Session 8 matters arising

Thank you for your email dated 3 June 2014. I can provide the following comments in response:

1. Paragraph 1.9 of the Council Response to Matters Arising (CRMA) makes reference to an alleged disproportionate role of Newport Retail Park (NRP) and concerns over the impact on the City Centre's role. The points made at the hearing and in our written submission remain valid and support the retention of the UDP / Eastern Expansion Area (EEA) District Centre boundary within the LDP, i.e. that the District Centre performs a crucial role in providing a sustainable and comprehensive development of the EEA, including being able to provide important linkages to the former Llanwern Steelworks site development and, that the substantial leakage of expenditure from Newport as a whole (circa £138 million of comparison goods expenditure lost) will not be remedied by drawing the District Centre boundary tighter than previously agreed as being acceptable.
2. Table 7 of the CRMA refers to the relocation of national chains from the City Centre suggesting that they have set up on Newport Retail Park. Whilst Dorothy Perkins, Burtons, Top Shop and Wallace are referred to as having relocated to NRPDC, this is not strictly the case. "Outfit" provides very much a reduced offer for each of the retailers within one store. It does not replicate a typical offer within a stand alone town centre store. Furthermore there is nothing to say that such retailers might not be interested in floorspace within the new Friars Walk scheme. Table 7 is therefore considered to give a false impression that high street retailers have relocated wholesale to NRPDC when this is not the case.
3. Paragraph 3.1 of the CRMA refers to a revised wording to policy R6, having accepted that Policy R7 on NRPDC should be deleted. It is our considered view that the revised wording put forward by the Council still makes an unjustified special case for NRPDC which would result in proposals for within the boundary (however it is to be defined) or land adjacent to it being treated differently to other District Centres.
4. The changes proposed within the CRMA appendix 2 are welcomed in respect of the deletion of Policy R7 but the following changes are considered necessary in order to ensure that Newport NRPDC is treated in the same way as other District Centres within the LDP.

~~WITHIN NEWPORT RETAIL PARK DISTRICT CENTRE AND WITHIN AND ADJACENT TO THE FOLLOWING DISTRICT CENTRES:~~

~~- NEWPORT RETAIL PARK~~

~~8.19 Newport Retail Park District Centre was designated in the Unitary Development Plan to provide local shopping facilities for the Eastern Expansion Area and surrounding residential areas in east Newport. Newport Retail Park District Centre fulfils a role as a District Centre, but has the potential to develop to a sub-regional role, which differentiates it from the other District Centres listed in Policy R6. A boundary for Newport Retail Park District Centre is defined in the District Centre Inset Plans. Within the defined boundary, Newport Retail Park District Centre will be assessed as a District Centre within the retail hierarchy for the application of the sequential test. Retail development in areas outside the defined District Centre will be subject to the sequential test, will have to demonstrate need and if these tests area met will have planning conditions restricting the range of goods sold. The application of these tests will help the vitality and viability of the City Centre.~~

Other changes highlighted in yellow within the CRMA appendix 2 are considered acceptable.

Conclusions

Having considered the CRMA provided by Newport, we are of the view that the arguments presented in the written representations at the hearing on behalf of reinstating the EEA definition of the NRPDC boundary (as shown on the attached diagram) remain valid.

The acceptance that Policy R7 should be deleted is welcomed but the changes which are proposed by Newport which would still set NRPDC apart from other district centres are not considered acceptable. Suggested revised wording is provided within the text above.

Thank you again for the opportunity to provide further comments.

Yours sincerely



Paul Williams
Associate Director