

Newport LDP

Hearing Session 8: Comments of Johnsey Estates Ltd on Council Response to Matters Arising (ED012.4A)

1. On 4th June 2014 the Council issued a response to matters arising in Hearing Session 8 on retailing. We set out the comments on the issued document on behalf of Johnsey Estates Ltd (JEL).

Comments on Section 1 and Appendix 1

2. It is correctly acknowledged by the Council that a comparison of turnover would require a new household survey. However in paragraph 1.2 it indicates that as a 'proxy' a comparison is made in terms of floorspace. We would suggest that the information, although informative, is not a proxy. This is illustrated by comparing Fig 5.2 at Page 62 of the CIRSCA report, which illustrates turnover at 2010 based on the household survey, with Table 1 of the Council's response which measures relative floorspace in 2010. It will be noted that there is a significant difference, reflecting the generally higher sales densities of city centre floorspace.
3. Table 1 of the Council Response shows that in floorspace terms there is a net difference in non-bulky comparison goods floorspace between the city centre and NRP of 9321 m² (net) in 2010. Table 2 shows that this differential increases to 19068 m² (net) in 2014 after allowing for developments at NRP in the period 2010-2014 and the implementation of the Friars Walk and Cambrian schemes in the city centre. This illustrates that Newport City Centre will materially increase its relative importance in terms of floorspace in this sector and it is of course also substantially larger in terms of other retail, service and other town centre uses.
4. Tables 3 and 4 show the position if Matalan and Megabowl are moved out of the defined centre into the 'out of centre' category. However this is purely illusory since they were either existing or a commitment pre-2010 and in practical terms they still both exist immediately adjacent to the reduced centre proposed by the Council. This emphasises the artificial nature of the separation.
5. Appendix 1 summarises the net changes in City Centre and NRPDC floorspace in the period 2010-14. The only figure I would comment on is the 4645 m² indicated for Megabowl. The note indicates that it was based on RPS comments at the Hearing. The figure of 4645 m² was in fact identified as a maximum potential floorspace assuming extensive mezzanine floors were installed. As indicated the retail occupiers are not settled at present and could include bulky, food or mixed retailers, such as Home Bargains and not

just non-bulky comparison goods operators. It is also worth noting that the current Sports Direct proposal for the Megabowl unit involves only a Sports Direct store of 3250 m² (gross) and the retention of the D2 unit (following the company's acquisition of LA Fitness).

Footfall

6. The footfall figures contained in Table 6 show lower footfalls in the City Centre in Feb-Sept 2010 than in the same period in 2013. The opposite is true of the period Nov-January when footfall was substantially higher in 2013. This seems very unusual and we would suggest that there may be other factors explaining the apparent decline from the high in Feb-Sept 2010. In Sept 2010 the Ryder Cup was staged in Newport and the local economy received a major boost to visitor activity both during the Ryder Cup itself but also in the period running up to the event. It goes without saying that footfall can be expected to increase substantially when the Friars Walk scheme opens next year.

Retailers in The City Centre

7. In Table 7, the original table presented to the Hearing has been updated. Comments were made orally at the Hearing and we would now comment briefly on the updated table:
 - Dorothy Perkins is still in the city centre albeit in a franchise unit;
 - Topshop may have moved out but they are one of the retailers taking new premises in Friars Walk;
 - H&M is also indicated as taking a major new unit in the Friars Walk scheme;
 - Sports Direct did not relocate to NRPDC from the City Centre: they were already in NRPDC well before the decision was taken to close the small unit in the City Centre. Sports Direct has closed small units in a number of other towns.
 - Mothercare closed most if not all town centre stores following a major restructuring of the business;
 - Next is opening a flagship store in the Friars Walk scheme;
 - Wallis is still represented in NCC albeit in a franchise unit;
 - Monsoon closed its Newport store but did not relocate to NRPDC;
 - Bon Marche closed a number of stores as part of the major restructuring of the Peacocks business.
 - Council documents indicate that the Friars Walk scheme was more than 50% let in November 2013, including a major department store for Debenhams and a range of prime retailers, many of whom are also trading at NRPDC, reflecting the complementary role of the 2 centres.

Comments on Appendix 2: Policy R6 as proposed to be amended

8. The deletion of Policy R7 is welcomed but the changes proposed to Policy R6 are considered illogical and inappropriate. Policy R6 in the current Deposit LDP, amended simply to include Newport Retail Park District Centre is considered to be perfectly adequate to deal with new proposals in the centre.
9. The first two criteria set out in the original policy R6 would enable the Council to test whether the proposal is of a scale appropriate to the district centre (criterion (i)) and whether the proposal would have an adverse impact on the vitality and viability of the City Centre (criterion (ii)). Also Policy SP20 requires that a hierarchical approach is taken to the sequential test.
10. The revised criterion (iii) effectively repeats the test in criterion (ii) but if specific attention is needed to this point then it could be included in the supporting text.
11. Clearly the proposal to amend the wording of Policy R6 to include areas adjacent to other centres but not NRPDC is of particular relevance if the defined centre excludes the land currently within the defined centre.
12. In our view it is entirely illogical to exclude the JEL site from the centre since this land supports town centre uses in its entirety (A1, A3 and D2 uses), represents an integral part of the whole and lies sandwiched between the LDP defined centre and the Eastern Expansion Area which it is meant to serve. To artificially declassify it, separate it from the whole and place it on an equal footing with ad hoc out of centre sites is illogical and contrary to the principles of sustainability. It also appears contrary to the objectives set out in revised paragraph 8.20.
13. It is not well founded to suggest that the revisions to policy are essential to the future of the city centre. Within the context of the current policy framework, which effectively reflects current Policy R6, the Council has refused application proposals at NRPDC and seen the implementation of the Friars Walk scheme. New LDP Policy SP20 gives added emphasis to the intended hierarchical approach.
14. Effective control over future development at NRPDC would exist with the framework provided by current LDP Policy R6, but amended to include NRPDC within the list of centres. However the district centre boundary outlined on LDP Inset plan 25 should also include the leisure and retail uses on the JEL land.

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