

**Newark and Sherwood District  
Council  
Local Plan Examination**

**Written Statement on behalf of  
Simons Developments and Tritax**

Hearing 1, Thursday 1 February 2018

January 2018



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Appendix 1: Site Supporting Statement (Contained in Separate Document)

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## **1. Introduction**

- 1.1. This Statement is submitted to the Newark and Sherwood District Local Plan Examination on behalf of Simons Development and Tritax Big Box REIT in respect of land east of Newlink Business Park, Newark. This site was put forward by Simons Development as an additional strategic employment site for inclusion in the Local Plan at the Preferred Options stage.
- 1.2. The Inspector has raised specific questions regarding the Spatial Policies of the Local Plan, which he wishes to discuss further at the scheduled hearing sessions. This includes the considerations of Spatial Policy 2, Spatial Policy 5 and Spatial Policy 9 which are of particular interest to Simons Developments/Tritax. This Statement seeks to address the Inspector's questions raised in respect of these policies as set out in the hearing agenda.
- 1.3. This Statement should be read alongside the Site Supporting Statement submitted as an Appendix to these representations.

## 2. Inspector's Matters and Issues

2.1. The Inspector has set out the key questions he wishes to discuss further at the scheduled hearings. These include the following questions of particular relevance to Simon Developments' and Tritax's land interest in Newark:

- Question 5: Bearing in mind any conclusions on 4 above, do Spatial Policies 1 and 2 represent a sensible approach?
- Question 9: Is Spatial Policy 5 effective in strategic delivery terms?
- Question 11: Is Spatial Policy 9 adequate in terms of coverage?

2.2. These questions are considered in turn below.

### **Spatial Policy 1 and 2**

2.3. Spatial Policy 1 sets out a settlement hierarchy for the District and identifies Newark as a Sub-Regional Centre which will be the main focus for housing and employment growth in Newark & Sherwood. We agree that the majority of development should be focused on Newark as the largest settlement and most sustainable location in the District.

2.4. Spatial Policy 2 sets out the level of development to be provided in the District over the plan period and how the proposed growth will be distributed in line with the settlement hierarchy.

2.5. With regard to employment growth, Spatial Policy 2 sets out an employment land requirement of around 83.1 hectares, 51.9 hectares of which are to be provided in Newark. Paragraph 4.22 of the Local Plan states that land for new employment development will generally be provided close to existing industrial and commercial areas, or be included as part of major mixed use housing and employment schemes. The Local Plan goes on to state at Paragraph 4.23 that employment provision will support Newark's role as a Sub-Regional Centre, deliver employment growth and benefit local regeneration goals. It is considered that this approach takes advantage of the towns' potential to be a major driver of economic development, with its key location, including proximity to the A1 corridor, and excellent rail, road and water connections.

2.6. The employment land target set out at Spatial Policy 2 is broadly in line with the requirement identified for the District through the Employment Land Forecasting Study (Examination Library Ref. EMP/01). This had identified an employment land requirement for industrial land ranging from 62.6 ha to 74.53 ha for the period 2011-2033 and a need for 91,192 to 113,040 sq.m. of office floorspace.

2.7. The Employment Land Forecasting Study states at Paragraph 6.16 that *"to ensure a flexible and responsive policy framework, it will be necessary not just to focus on meeting forecast quantitative requirements (which will fluctuate over*

*time), but to consider the opportunities and risks that flow from particular policies or types of land allocations. This might concern how delivery can be prioritised in some locations or for some types of employment uses, or how scope can be created for meeting as yet undefined inward investment opportunities.”*

- 2.8. We consider that Spatial Policy 2 would provide a more flexible and responsive policy framework by explicitly expressing the employment land target as a minimum. This would help to ensure that as yet undefined inward investment opportunities are not turned away simply on the premise that the employment land target for the plan period has been met. We also consider that greater flexibility needs to be introduced into the employment land supply by allocating a greater range of sites in the Plan as further outlined below.

### **Spatial Policy 5**

- 2.9. Spatial Policy 5 allocates four strategic sites in the District to ensure that the identified housing and employment land requirements are met. Two of the allocated strategic sites will contribute towards meeting the employment land requirements; Land to the south of Newark (NAP2A) and Land around Fernwood (NAP2C).
- 2.10. Site NAP2A includes an allocation of 50 ha of employment land to meet industrial/logistics requirements (Use Class B2/B8), whilst Site NAP2C is allocated for a mix of uses including 15 ha of land for offices (Use Class B1).
- 2.11. Spatial Policy 5 states that the Plan allocates sufficient sites to more than meet the identified housing and employment land requirements and that it provides sufficient flexibility to allow for some sites not delivering as anticipated, whether in terms of the rate of delivery or due to unanticipated considerations preventing development occurring.
- 2.12. We strongly disagree with this statement. In quantitative terms, the Local Plan makes sufficient provision to meet the identified employment land requirement. However, the Plan actually only allocates one site of a strategic nature (NAP2A) which would be suitable for a strategic logistics/industrial users.
- 2.13. Whilst of a sufficient size to accommodate a range of occupier requirements, the employment site NAP2A has a number of short-medium term delivery issues and is unlikely to come forward until the latter stages of the Local Plan period. Although it has an outline planning permission (as part of the wider outline for Newark South) it is notable that the site has been marketed for some years without success and its current marketing is very low key whilst delivery of infrastructure is awaited. The site requires a link to be provided to the new Southern Link Road which is yet to be constructed. The lack of immediate deliverability is a key issue for this site as the strategic distribution market is driven by occupiers looking for ‘oven-ready’ sites that can be delivered quickly. The site also lies in a slightly peripheral market location and is separated from

the main urban area of Newark with no established employment areas nearby. Currently, employment uses in the area are concentrated at the north-eastern edge of Newark in close proximity to the A1, A46 and A17.

- 2.14. Apart from the strategic site allocation NAP2A we are aware of only one other site in Newark with potential to accommodate large industrial/logistics users – G-Park, Brunel Drive, Newark. Outline Planning Permission for a mixed-use development including housing, employment and recreation uses was originally granted in 1990. The employment element of the scheme has never been delivered despite the grant of various Reserved Matters proposals in the early 2000s and active marketing of the site. The site has a fundamental problem with its access which is via the local road network. This makes the site unsuitable and unattractive for a large footprint industrial or logistics occupier. In our opinion this site is only suitable for local employment needs and its continued protection for employment may even need reconsideration for other uses as is encouraged by the NPPF.
- 2.15. There is therefore no high quality and immediately deliverable site in Newark that is available for operators looking for large high quality sites and we consider that this lack of strategic land allocations will constrain investment in the District. We submit that an additional allocation should be identified in the Local Plan to supplement the existing employment land supply and offer a greater choice of sites to potential businesses seeking to locate or expand in the District, and in particular to attract inward investment.
- 2.16. It is submitted that Land to the east of Newlink Business Park offers the best location for such additional employment growth as set out in more detail in the Site Supporting Statement submitted as Appendix 1 to this Statement.
- 2.17. The site extends to approximately 48.3 hectares and currently comprises agricultural land. It lies immediately east of the Newlink Business Park.
- 2.18. Newlink Business Park is a highly successful distribution location. The first phase of the site was built in 2003 with a second major phase following in 2006. Combined these provide some 134,000 sq.m of floorspace. A third and final phase for a further 17,236 sq.m was granted permission in 2010. The site is occupied by the Logistics and Services Division of DSG Retail Ltd (part of the Dixons Carphone Plc group). It is the principal National Distribution hub for direct store replenishment, home deliveries and returns. It also accommodates the group's main service repair centre, Knowhow. It is one of the largest sites of its kind in Europe and employs 3,000-4,000 people. It is understood to be the largest employer in the Newark area.
- 2.19. The site is strategically located with direct access off the A17. It lies immediately to the east of the A1, A17, A46 interchange and benefits from excellent connectivity north and south via the A1/A1M and onto the M1.

- 2.20. As shown in the Site Supporting Statement, the site is immediately available and deliverable. There are no known technical or land ownership constraints. An initial masterplan for the site has been prepared and shows how the site could accommodate a range of large footprint user requirements within Use Class B2 and B8, with a total potential floorspace of some 185,000 sq.m.
- 2.21. The site was assessed as part of the 2017 SHELAA (Examination Library Ref. HOU/08, Page 7, Site Ref. 16\_0174, and HOU/09, Coddington Section Ref. 16\_0174). This assessed the site as 'may be suitable' and the overall conclusion states:
- “If the Urban Boundary designation is changed through the development plan process this site could be considered suitable for employment subject to appropriate mitigation works. The site is both available and achievable”***
- 2.22. It is considered that the site presents the best opportunity in Newark for large scale employment development which could be brought forward in the early stages of the plan period. The inclusion of the site as an additional strategic allocation in the Local Plan would help to ensure that the Local Plan contains adequate flexibility to deliver its economic objective to develop a strong, sustainable economy that provides a diverse range of employment opportunities for local people and secure inward investment.

### **Spatial Policy 9**

- 2.23. Spatial Policy 9 has been included in the Local Plan to guide the allocation of additional sites to meet development needs within the District. It sets out a number of criteria which sites allocated for housing, employment and community facilities will need to satisfy. We consider that this policy sets out an adequate list of development considerations and would like to point out that the land east of Newlink Business Park would satisfy all the criteria for the selection of new sites contained within the policy as follows:
1. Be in, or adjacent to, the existing settlement – The site is located adjacent to the Newark urban area immediately adjacent to the Newlink Business Park;
  2. Be accessible and well related to existing facilities – The site immediately adjoins the Dixons/Knowhow distribution centre complex and can be accessed off the A17. There is off road footway/cycleway provision to the existing Newlink Business Park and this could be extended into the proposed new site. There are also public footpath routes that run along the site's eastern and northern boundary connecting the villages of Coddington with Winthorpe to the north-west of the A46.
  3. Be accessible by public transport, or demonstrate that the provision of such services could be viably provided – The site can be made

accessible by public transport, as acknowledged by the Site Assessment included in the 2017 SHELAA.

4. Be the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address sustainability issues – The site is accessible and well related to the existing urban area of Newark. Development of the site would make good use of the existing strategic highway infrastructure and avoid adding congestion to the local highway network.
  5. Appropriately address the historic environment, heritage assets and their setting in line with national policy and guidance and the findings of any Historic Impact Assessment for the site – The site adjoins the Coddington Conservation Area. The impact of any proposed development on the character of this conservation area would form an important consideration in the detailed design of the site. As shown by the Site Supporting Statement, the site offers significant scope for inclusion of buffer planting to mitigate any impacts of the development on the conservation area.
  6. Appropriately address the findings of the Landscape Character Assessment and the conservation and enhancement actions of the particular landscape policy zone/zones affected – Landscape and visual impact issues can be mitigated through structural landscape areas surrounding the site.
  7. Not impact on sites that are designated nationally or locally for their biodiversity and give preference to sites of lesser environmental value, avoid impact on biodiversity and provide net gains in biodiversity wherever possible – The site is not covered by any nationally or locally designated nature conservation sites. Account can be taken of features of nature conservation value through the scheme layout and design with opportunities created to protect and enhance the biodiversity of the site.
  8. Not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced) – The site is currently in agricultural use and will therefore not lead to the loss of open space or locally important community facilities.
  9. Be assessed by reference to a sequential risk based approach in order to be located in areas at the lowest risk of flooding and not increase flood risk on neighbouring sites – The site is at low risk of flooding.
- 2.24. Further detail on the site is provided in the Site Supporting Statement submitted with these representations.

### **3. Conclusions**

- 3.1. In order to make the employment land policies of the Local Plan sound, positively prepared and effective, it is considered that additional strategic employment land should be identified to provide a greater choice of sites and introduce the necessary level of flexibility required to proactively encourage inward investment and the sustainable economic growth of Newark and the wider District.
  
- 3.2. Land to the east of Newlink Business Park provides the best opportunity to provide such additional employment land. It is an established distribution location with excellent access to the strategic road network, which is highly attractive to the market. The site has no known technical or land ownership constraints and could therefore be brought forward in the early stages of the plan period.