

Addendum to Retail Statement

Our reference no: 260107A

Date of statement: June 2026

Site address: 17-21 Wharf Road, Newport

Proposed development: Change of use to a convenience store (Use Class A1)

Applicant: AJ Tech Design



Introduction

1. This Addendum ('Addendum') relates to the planning application ref 26/0237 for the proposed development comprising change of use to a convenience store (Use Class A1) ('Proposed Development' or 'Proposal'). The Proposal is located at 17-21 Wharf Road, Newport, NP19 8ET ('Site'). The application is being determined by Newport Council ('Council').
2. This Addendum should be read in conjunction with the Retail Statement (Dated March 2026) submitted alongside the planning application. This Addendum addresses the points raised by the Council in their response (see **Appendix 1**), specifically in relation to the sequential approach and impact assessment.

Applicant's Response

3. This section will consider, in turn, each of the points raised by the Council in its response.

Sustainable / edge-of-centre location

4. The Council does not accept that the Site is edge-of-centre and raises concerns regarding the relationship between the Site and Maindee District Centre, including the presence of the dual-carriageway corridor and the one-way system on Archibald Street. The Applicant respectfully disagrees with that position.
5. The applicant disagrees with this position. Paragraph 7.4 of TAN 4 states that edge-of-centre proposals should not normally be located more than 200-300 metres from the edge of the centre. The Site is approximately 60 metres from the Maindee District Centre boundary. It is therefore comfortably within the typical distance parameters for an edge-of-centre location.
6. TAN 4 also recognises that the size of the centre, local topography and physical barriers may influence an assessment. However, in this case those factors do not displace the clear edge-of-centre relationship. Wharf Road includes footways, the route to Maindee District Centre is short and direct, and the junction to the north benefits from dedicated pedestrian crossing facilities. The Site is also visible in the wider commercial corridor associated with Chepstow Road and Maindee, rather than being physically or functionally remote from it.
7. In addition, the Site is accessible by sustainable modes of transport; it lies within a very short walking distance of Maindee District Centre and close to bus stops on / around Chepstow Road, including services identified in the Retail Statement (bus nos. 5, 6, 8A/8C, 9C, 73, 74/74A and X60) serving destinations including Newport city

centre, Ringland, Chepstow, Magor, Monmouth, Liswerry, Underwood and intermediate stops.

8. The Council's comments in respect of vehicular circulation and Archibald Street do not alter the retail planning conclusion. Linked trips do not require every customer to arrive by car, to park at the application site, and then to drive into Maindee District Centre. In an urban edge-of-centre context, linked trips can include customers walking from the District Centre to the Site, visiting the proposed store as part of a wider Maindee trip, or parking once within the wider Maindee area and visiting multiple shops and services on foot.
9. It is acknowledged that not every trip to the proposed store would be linked with Maindee District Centre. However, that is not the relevant test. The key point is that the Site's short, direct and walkable relationship with Maindee provides a realistic opportunity for linked activity, additional footfall and wider spill-over benefits. This is a material benefit of the Proposal and should not be discounted simply because some customers may visit the proposed store as a single-purpose trip.
10. The Applicant also notes the historic delegated report for application ref. 07/0246 relating to a nearby property, which described that property as "only just falling outside Maindee District Centre". Whilst that decision is historic and not determinative, it is consistent with the physical context of the Site that this part of Wharf Road is closely related to the Maindee DC.
11. Without prejudice to the Applicant's position that the Site is edge-of-centre, the conclusions of the Retail Statement and this Addendum would remain robust even if the Council were to treat the Site as out-of-centre. The sequential assessment has considered sequentially preferable locations, and the impact and need assessment demonstrates that the scale and specialist nature of the Proposal would not harm the vitality or viability of nearby centres.

Proposal trading format

12. The proposed store would operate as a small-scale Turkish / ethnic food convenience store. It is not a mainstream supermarket, discount foodstore or general local convenience store. The offer would include a broad everyday convenience range, but with a specialist Turkish emphasis, as well as Middle Eastern, Mediterranean, Balkan / Eastern European, albeit to a smaller extent.
13. The proposed range is expected to include staple convenience goods such as bread, milk, eggs, dairy products, cheese, fresh and frozen meat, fresh produce, rice, bulgur, pulses, flour, oils, canned and jarred goods, tea, coffee, confectionery, soft drinks,

frozen goods and household top-up items. However, many of those products would be imported, prepared to Turkish / ethnic recipes, halal, or otherwise supplied in specialist formats that are not widely available from mainstream convenience stores.

14. The Proposal would therefore fill a specific qualitative gap. For many customers, these goods are not discretionary ‘special occasion’ purchases; they are everyday staples forming part of normal household food shopping. The Proposal would improve access to culturally appropriate staple goods for local communities, whilst also broadening the choice available to the wider population.
15. Operationally, the store would differ from a mainstream convenience format in a number of important respects:
 - the sales area is modest, at approximately 133 sqm, with upper floor space used for ancillary storage, staff welfare, office and back-of-house functions;
 - the store would have a higher proportion of specialist imported, ethnic, halal, dried, frozen and counter / deli goods than a general convenience operator;
 - it would be likely to serve a mix of top-up, specialist destination and locally based shopping trips, rather than functioning as a large-scale main food shopping destination;
 - its catchment and trading overlap with mainstream operators would therefore be limited by the principle of ‘like competing with like’; and
 - the store would complement, rather than duplicate, the existing general convenience offer in Maindee and the wider area.

Customer profile and local demographics

16. The Council has requested further qualitative information on the way in which the Proposal would fill an identified gap in the provision of staple goods to the identified demographic. The Proposal’s core customer base is expected to include local Turkish, Middle Eastern, Mediterranean, Balkan / Eastern European and other ethnic communities, whilst also attracting wider residents seeking specialist and international food products.
17. Based on the 2021 Census, the Victoria Ward (which includes Maindee area) includes a population within selected ethnic categories that are likely to be relevant to the Proposal’s specialist offer. These categories include: ‘Asian, Asian British or Asian Welsh: Other Asian’; ‘Mixed or Multiple ethnic groups: White and Asian’; ‘Mixed or Multiple ethnic groups: Other Mixed’; ‘White: Other White’; ‘Other ethnic group: Arab’; and ‘Other ethnic group: Any other ethnic group’. The total population within those categories was identified as approximately 1,474 persons in 2021.

18. Applying the average annual population growth rate used in the Retail Statement evidence base results in an indicative selected ethnic population of approximately 1,529 persons by 2029 within Victoria Ward alone. Multiplying this figure by the 2029 per capita convenience expenditure of £2,558 indicates a gross convenience expenditure pool of around £3.9m per annum before adjustments for special forms of trading and before recognising that much of this spend is already committed to mainstream food shopping. This is not presented as a direct capacity figure, but it demonstrates that there is a meaningful local population and associated expenditure base for the specialist offer.
19. The demographic evidence should be read alongside the existing local retail offer. The review of provision identifies a number of general convenience stores within Maindee District Centre, together with some specialist ethnic / international provision in the wider area. However, no dedicated Turkish-focused convenience store has been identified in Newport as part of the Applicant's review.

Existing provision	Location / role	Relevance to the Proposal
Supermarket ABC	148-152 Chepstow Road, within Maindee District Centre; publicly presents as a Polish / European food shop.	Provides international / Eastern European products, but, albeit there is some retail offer overlap, they comprise of a different convenience retail offer from a Turkish / Middle Eastern / Mediterranean convenience offer.
Chepstow Mini Market, Fair Price, My Maindee and Premier Maindee	Small general convenience stores within Maindee District Centre.	Provide day-to-day top-up goods, but do not provide a dedicated Turkish-focused staple goods offer.
Nazar Mini Market	Eastern European convenience store within Corporation Road District Centre, approximately 360m south of the Site.	Represents specialist ethnic grocery demand in the wider area, but has a different product focus.
Mas Bazaar / Kolys Foods	Specialist Asian / African grocery and halal butcher at / around Tredegar Street, outside the immediate Maindee District Centre context.	Provides halal and international goods, but is not directly comparable to the proposed Turkish-focused convenience offer and is located materially further away.

20. This existing provision is important for two reasons. Firstly, it demonstrates that specialist ethnic grocery provision forms part of the established retail 'ecology' of Newport, especially around Maindee, where the Proposal responds to an identified qualitative need, specifically in relation to ethnic produce convenience retail offer. Secondly, it demonstrates that the proposed Turkish-focused store would not simply replicate the existing Maindee offer but rather it would add a distinct range of staple goods and would improve local access to products that are not currently well represented.
21. In that context, the Proposal would not merely 'broaden consumer choice' in an abstract sense but it would address an identifiable local qualitative gap, provide ethnic staple goods, reduce the need for some customers to travel further afield for

specialist food shopping, and support the diversity and attractiveness of the Maindee town centre.

Proposal turnover

22. The Council has queried the estimated turnover of approximately £0.8m in 2029 and suggests that the applied sales density of £6,018 per sqm is particularly high. The Applicant respectfully disagrees that the assumption is disproportionate. In fact, the Retail Statement applies a deliberately cautious / 'worst case scenario' turnover assumption for the purposes of assessing potential impact.
23. The proposed operator is a small independent specialist ethnic grocery store. Such stores may reasonably be expected to trade at a considerably lower productivity than national multiple convenience retailers because they typically include a greater proportion of imported, specialist, dried, frozen, counter, deli and lower stock-turnover lines, and because the unit includes a specialist destination element rather than a purely high-throughput convenience format.

Scenario	Assumed sales density	Estimated turnover at 133 sqm net sales
Lower sensitivity based on Costcutter benchmark	£4,596 per sqm	c. £0.61m
Tested Retail Statement assumption	£6,018 per sqm	c. £0.80m
Iceland benchmark comparison	£6,663 per sqm	c. £0.89m
Spar benchmark comparison	£7,484 per sqm	c. £1.00m

24. The sensitivity table demonstrates that the £0.8m turnover assumption should be treated as a robust upper-case test rather than as an understated impact assumption. A lower and still reasonable specialist independent sales density would reduce the estimated turnover and any associated trade diversion accordingly.
25. Even on the tested £0.8m turnover assumption, the scale of the Proposal is very modest in the context of the local convenience market. Table 1 of the Retail Statement identifies £107.0m of convenience goods expenditure in Zone 3 in 2029. The Proposal's total turnover would therefore represent less than 1% of Zone 3 convenience expenditure. Assuming, conservatively, that 80% of turnover is diverted from stores within Zone 3, the resulting £0.6m Zone 3 diversion would represent approximately 4% of the identified Zone 3 convenience turnover of £15.8m in 2029 with a lower figure of 3.1% impact for the lower sensitivity sales density scenario.
26. Moreover, the 80% Zone 3 diversion assumption is itself cautious. A specialist Turkish / ethnic food store would be expected to capture some expenditure currently spent outside Zone 3, including trips to other specialist stores elsewhere in Newport or further afield, especially given that there are no other Turkish produce focused stores in Newport. Therefore, the more realistic trade draw from areas

outside Study Zone 3 could be as close as 50-60%, meaning that the overall impact on Maindee town centre could be as low as £0.4m or £0.3m for the lower sales density scenario, equating to an impact on Study Zone 3 of 2.5% or 2%, respectively, in percentage terms.

27. Lastly, it is important to note that the impact figures outlined above and previously in the Retail Study would be spread across the various centres and retail destinations across Study Zone 3 meaning that the overall impact would be further diluted on any given centre/shop, including Maindee DC.

Existing retail floorspace capacity

28. The Applicant acknowledges the Council's point that the Newport Retail and Leisure Study and subsequent updates identify no strategic quantitative capacity for additional mainstream convenience floorspace across the authority area. However, that finding should not be interpreted as a moratorium on all small-scale convenience proposals, particularly where the proposal is specialist in nature, modest in scale, and responds to a qualitative gap.
29. Retail need and impact are multi-dimensional. Quantitative capacity is an important consideration, but it is not the only relevant consideration. TAN 4 requires qualitative need to be also assessed, particularly where provision is inadequate or where the proposal would improve the distribution and range of retail provision serving local communities.
30. The Proposal does not comprise a large mainstream foodstore requiring substantial uncommitted expenditure capacity. It consists of a small specialist convenience store with a modest sales area and a distinct product offer.
31. The Retail Statement's benchmark analysis demonstrates that the identified Zone 3 convenience provision is, in aggregate, trading below benchmark. That position means the Proposal should not be justified on the basis of a general quantitative surplus for mainstream convenience floorspace. However, it also demonstrates that there is no evidence of widespread significant understanding context, with a number of shops performing above their benchmarks.
32. The most relevant comparator for the Proposal is the 'Other, Zone 3' category, which is identified in the Retail Statement as trading above benchmark by approximately £0.8m in 2029. Even if the full assumed £0.6m Zone 3 diversion were attributed to that category, it would not suggest a harmful level of trade diversion. In practice, the diversion would be spread across a range of stores and part of the turnover would be drawn from expenditure currently spent outside Zone 3.

33. The Proposal is therefore capable of being supported notwithstanding the absence of quantitative capacity for additional mainstream convenience retail floorspace. It would re-use a vacant building, improve local shopping choice, serve a specific demographic and product gap, and do so at a scale that will not result in a considerable impact on the vitality and viability of any town centre in the catchment area.

Qualitative benefits

34. The Council has attached only limited weight to the qualitative benefits on the basis that broadening choice could be repeated for individual retailers. The Applicant agrees that broadening choice is not automatically determinative in every case. However, the weight to be attached to that benefit depends on the evidence and local context.
35. In this case, the benefit is specific and evidenced as mentioned above and in the Retail Statement. The Proposal would introduce a Turkish-focused convenience offer that is not presently well represented in the local area; it would serve an identifiable demographic and wider customer base; it would offer staple goods rather than merely discretionary speciality products; and it would occupy a small, accessible building closely related to Maindee District Centre.
36. Paragraph 9.3 of TAN 4 emphasises the importance of flexibility to attract investment and diversify the range of businesses in vulnerable or declining centres. Maindee District Centre has experienced changes in its retail role over time, and the Retail Statement identifies that its comparison and national multiple retail offer has weakened. In that context, a flexible approach which supports complementary specialist convenience provision adjacent to the centre is consistent with the wider policy objective of strengthening smaller centres through diversity.
37. The Proposal would be likely to support linked activity with Maindee District Centre with customers visiting the proposed store also likely to be using other existing services and facilities within Maindee DC, including general convenience stores, takeaways, cafes, restaurants, personal services and other local businesses. Conversely, customers already visiting Maindee may walk to the proposed store because of its distinct offer. This is a realistic benefit given the very short walking distance and direct physical relationship.
38. The qualitative benefits should therefore be given meaningful weight. They are not generic benefits relied upon in isolation; they are supported by the Site's location, the absence of a directly comparable local offer, the demographic evidence, and the modest scale of the Proposal.

Sequential test

39. The Council has raised three points in relation to the sequential assessment: (i) the Site should be treated as out-of-centre; (ii) the full address of the sites considered should be provided; and (iii) the use of 285 sqm gross internal area may have affected the alternatives considered because the proposed net sales area is 133 sqm.
40. For the reasons already set out, the Applicant maintains that the Site is edge-of-centre. Nevertheless, the sequential assessment remains robust on a without-prejudice basis even if the Council were to treat the Site as out-of-centre, because the assessment has considered potentially sequentially preferable alternatives within the relevant catchment area and no suitable and available alternative has been identified.
41. In relation to the floorspace criterion, the original assessment used the gross internal area of approximately 285 sqm with a 20% flexibility allowance, resulting in a search range of approximately 228-342 sqm. That approach was reasonable because the Proposal requires more than a sales floor. It requires storage, staff welfare, office / administration space, WC facilities, back-of-house functions, servicing and operational space. A unit capable only of accommodating the 133 sqm sales floor would not necessarily be capable of accommodating the Proposal as a functioning store.
42. However, to respond directly to the Council's concern and to demonstrate a high degree of flexibility, the Applicant has also considered the sequential position using a lower floorspace threshold based on the 133 sqm net sales area. This is a deliberately generous test in favour of sequentially preferable sites, because it assumes that the non-sales floorspace could be substantially reduced or accommodated in a different way, even though that may not reflect the practical requirements of the intended operation.
43. The sequential assessment has been updated to include this lower floorspace threshold and the relevant appendices, including property particulars, were enclosed in this response (see Appendix 2).
44. On the basis of the Retail Statement, the Applicant's further review and the application of a proportionate degree of flexibility, no suitable and available sequentially preferable alternative site has been identified that could accommodate the Proposal. The sequential test is therefore satisfied.

Conclusion

45. This Addendum has been prepared in response to the Council's retail comments and should be read alongside the submitted Retail Statement. It provides further clarification in relation to the Site's location, the nature of the proposed retail offer, qualitative need, turnover and impact, and the sequential assessment.
46. For the reasons set out above, the Applicant maintains that the Site is characterised as in an edge-of-centre location; it is located approximately 60 metres from Maindee District Centre, within the prescribed TAN 4 edge-of-centre distance parameters, and is easily accessible from Maindee DC within a 2-minute walking distance.
47. The Proposal would provide a small-scale Turkish / ethnic convenience store with a specialist product offer that is not currently well represented locally. It would serve an identifiable local demographic and wider customer base by improving access to staple convenience goods in Turkish, Middle Eastern, Mediterranean, halal and wider ethnic formats. This represents a specific qualitative benefit rather than a generic broadening of retail choice.
48. The Proposal is modest in scale, with a net sales area of approximately 133 sqm, and the turnover assessment adopts a cautious 2029 turnover assumption of approximately £0.8m. Any trade diversion would be limited, diluted across a range of existing stores and centres, and would not result in a significant adverse impact on the vitality or viability of Maindee District Centre or any other defined centre.
49. While the Applicant acknowledges that the Council's evidence base does not identify strategic quantitative capacity for additional mainstream convenience floorspace, the Proposal is not a mainstream foodstore. It is a small specialist store responding to a demonstrable gap in the existing retail offer, and the absence of general quantitative capacity should not be treated as insurmountable on such proposals.
50. The Applicant also maintains that the sequential test is satisfied. No suitable and available sequentially preferable alternative has been identified, whether assessed against the gross internal floorspace required for the Proposal or the lower net sales floorspace threshold considered in response to the Council's comments.
51. Overall, the Proposal is acceptable in retail planning terms. It is appropriately located, specialist in nature, modest in scale, supported by a clear qualitative need, and would not materially harm the vitality or viability of any defined centre. The Council is therefore respectfully requested to withdraw its retail objection and support the application

Appendix 1 – Council Comments

The Council's retail comments are reproduced below for completeness.

"Further to my recent email relating to Highways matters, having now reviewed the retail statement accompanying the application I wish to advise that I am unable to support the proposals on the basis of the information submitted to date. I have set out the reasons for this below:

The statement affirms that the principal need case for the proposal is qualitative and goes on to justify this on the basis that the proposal would broaden consumer choice and support linked trips with Maindee District Centre, thereby making a positive contribution to the DC. The broadening of retail choice is a benefit that could be replicated time and again for individual retailers and only limited weight is attributed to this. Furthermore, I consider this justification to be significantly flawed given the location of the site and disjointed relationship with Maindee DC. The site is not highly accessible on foot, and this is indicative of its out of centre location. The vehicular accessibility matters that I have raised by separate email and one way system in Archibald Street mean that it is also unlikely to result in shoppers travelling by car to Maindee DC (where there is on street parking to the front of units and a public car park) from carrying out joint visits with the application premises. On this basis only limited weight is attached to the qualitative benefits of the proposals that has been offered. The Retail Statement lacks qualitative information relating to the following considerations:

- The way in which the proposal would fill an identified gap in providing staple goods to the identified demographic;
- The operational differences between the way in which the intended Turkish supermarket would function compared to more generalised supermarkets;

Notwithstanding the shortcomings in the qualitative information accompanying the application, I would also raise concerns with regard to aspects of the quantitative information. The statement confirms that existing convenience destinations within the defined area are not overtrading, to the contrary they are generally trading below benchmark. This would support the position of the Council's Retail Study (2018) and more recent updates in preparation for the RLDP, that there is no additional capacity for convenience goods within the city and does not provide any evidence that the proposal would be unlikely to draw trade from existing centres.

The proposed supermarket is estimated to generate a turnover of approximately £0.8m in 2029, based on a net sales area of 133 sqm and an average sales density of £6,018 per sqm. This figure is considered to be particularly high when compared with national averages and is considered to be disproportionately high given the absence of any additional capacity for convenience goods within the city.

I would also raise concerns with regard to the sequential assessment accompanying the application. Firstly, it is not accepted that the site is edge of centre. It is out of centre and is not well connected to Maindee DC given the severance by a dual carriageway and connectivity to Maindee DC should not form any requirement of any subsequent SA. Secondly, the full address of the sites considered under the SA referred to in Appendix A, have not been provided and I am therefore unable to fully critique the assessment. Secondly, it is not understood how the floor space arrived at has been used for the purpose of the SA. Whilst the building has a gross internal floorspace of 285sqm, the ratio between the sales and non-sales area is disproportionately high in this instance with the sales spaces constituting 133m² compared to the non-sales upper floor square meterage of 152m². It is not known why the full 285m² has been used for examining potential alternative sites and this has potential to impact the sites that have been reviewed."