

**Bathwick Tyres, 449 Corporation
Road, Newport, NP19 0HE**

Planning Supporting Statement

April 2026

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	Authorised by Nigel Pugsley
	Signature
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	Please return by N/A

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by tor&co on behalf of Micheldever Tyre Services Ltd (“the Applicant”) in support of a full planning application at Bathwick Tyres, 449 Corporation Road, Newport (the “Site”). The Proposed Development is described as:

‘Change of use of Bathwick Tyres site to Class B2 and B1 (formerly B1) to allow for MOT Testing’.

- 1.2 The Site currently benefits from a lawful Class B1 (Business) use, established under planning permission ref. 96/0445, granted in May 1996.
- 1.3 The application seeks to extend the range of permitted uses to include Class B2 (General Industrial) to facilitate the operation of an MOT Test Centre, alongside the existing lawful B1 use. This represents a complementary addition to the Site’s established automotive use.
- 1.4 The application is submitted to Newport City Council (“NCC”).
- 1.5 This Statement sets out the planning justification for the Proposed Development, having regard to relevant national and local planning policy and material considerations.
- 1.6 The structure of this Planning Statement is as follows:
- **Section 2** details the background and context for the Site;
 - **Section 3** outlines the Site’s planning history;
 - **Section 4** describes the Proposed Development;
 - **Section 5** sets out the relevant planning policy for the Site;
 - **Section 6** evaluates the application proposal in the context of the planning policy and other material considerations; and
 - **Section 7** summarises our conclusions.

2.0 Site Context

- 2.1 The Site extends to approximately 0.14 hectares and occupies a prominent corner plot at the junction of Argosy Walk and Corporation Road, a key arterial route connecting Newport city centre with the eastern suburbs.
- 2.2 The Site comprises a commercial building of up to two storeys, set back from the highway behind a large hard surfaced forecourt used for vehicle parking. The unit is currently in use as an automotive centre.
- 2.3 The lawful use of the Site is Class B1 (Business), established under planning permission ref. 96/0445 (17 May 1996).
- 2.4 An extract of the Site's location can be seen in Figure 1 below.

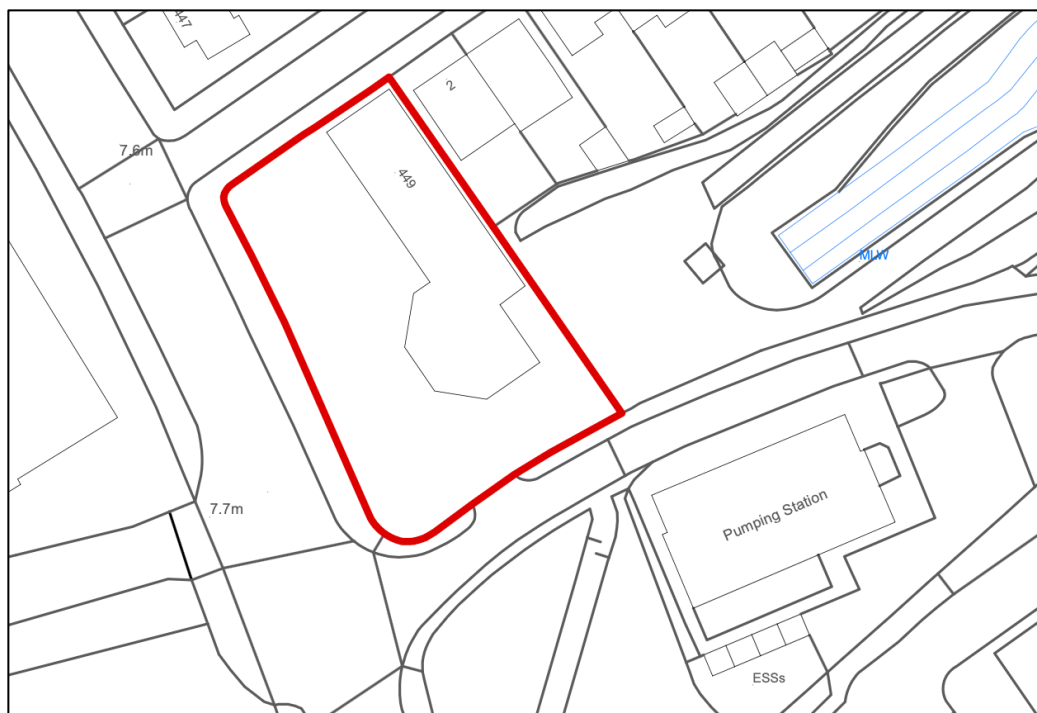


Figure 1: Site Location Plan

- 2.5 The surrounding area is mixed in character, comprising both commercial and residential uses. Residential properties are located to the north and east, while commercial uses, including a car sales garage and filling station, are situated opposite the Site to the west. A larger retail store lies to the south, alongside other commercial units.
- 2.6 The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 (Rivers) and 3 (Sea) and a TAN15 Defended Zone (C1).
- 2.7 Liswerry Recreation Ground, a designated Formal Play Area, adjoins the Site to the east, providing open space and recreational facilities. Further south, the River Usk Special Landscape Area and associated walking and cycling routes are located.

- 2.8 The Site is located within an urban area and benefits from a sustainable location with good accessibility. Vehicular and pedestrian access is taken directly from Corporation Road.
- 2.9 Public transport accessibility is good, with bus stops in close proximity served by the 43 route, providing connections between the city centre (Friars Walk) and eastern areas including Liswerry, Spytt, and Newport Retail Park.

3.0 Planning History

3.1 A desk top search of NCC's online database has been carried out to determine the relevant planning history for the Site which is outlined below in chronological order:

- **26/0039** | Removal of existing glazed doors and windows and replacement with cladding and roller shutter door | Approved 5 March 2026
- **00/1030** | Installation of security fencing | Refused 26 October 2000
- **96/0445** | Erection of vehicle dealership to include showroom workshop facilities | Approved 17 May 1996
- **91/1438** | Erection of 2.4m chainlink boundary fence | Refused 24 February 1992
- **91/1183** | Change of use of site to display conservatories | Approved 15 November 1991
- **91/0717** | Use of site to display upvc conservatories and windows and retail | Approved 6 August 1991

3.2 The Site's lawful use is established as Class B1 (Business) under planning permission reference 96/0445, which authorised the development of a vehicle dealership with associated showroom and workshop facilities.

3.3 The most recent permission (reference 26/0039) approved alterations to facilitate improved access to the building, including the installation of a roller shutter door. The officer's report acknowledges the intended use of the building for MOT testing and advises that planning permission should be sought to regularise the use through the introduction of Class B2.

3.4 This application therefore seeks to extend the range of permitted uses to include Class B2, thereby enabling MOT testing to be undertaken lawfully alongside the existing Class B1 use.

4.0 The Proposed Development

- 4.1 The Proposed Development seeks planning permission to extend the range of permitted uses at the Site to include Class B2 (General Industrial), alongside the existing lawful Class B1 (Business) use. The description of development is:

‘Change of use of Bathwick Tyres site to Class B2 and B1 (formerly B1) to allow for MOT Testing’.

- 4.2 The application is solely for a change of use. No operational development is proposed, and there would be no increase or loss of floorspace.
- 4.3 The purpose of the application is to enable the lawful operation of an MOT Test Centre at the Site, in accordance with DVSA requirements.
- 4.4 In terms of access, this would remain as existing from Corporation Road for pedestrians and vehicles.
- 4.5 Given that no operational development is proposed, there would be no change to the Site’s built form, visual appearance, or spatial footprint. The proposals would therefore preserve the character of the Site and its relationship with the surrounding area.
- 4.6 In terms of environmental considerations, the Site is entirely hard surfaced and occupied by existing built development. As such, the proposal does not include any physical works and is not considered to give rise to requirements for biodiversity enhancements. This matter is addressed in further detail within the Planning Assessment.

5.0 Planning Policy Context

5.1 This section considers the relevant national and local planning policy framework, which comprises the following:

- Future Wales: The National Plan 2040 (2021);
- Planning Policy Wales (PPW) (Edition 12, 2024);
- Relevant Technical Advice Notes (TANs);
- The Newport Local Development Plan (NLDP), adopted 2015, covering the period 2011-2026;

Future Wales: The National Plan 2040

5.2 Future Wales sets out the Welsh Governments land use priorities and provides national land use framework for SPDs and LDPs.

5.3 Relevant Future Wales objectives include:

Policy 1 (Where Wales Will Grow) – identifies Cardiff, Newport and the Valleys as a National Growth Area where sustainable economic growth and investment are supported.

Policy 9 (Resilient Ecological Networks and Green Infrastructure) – requires the maintenance and enhancement of biodiversity and green infrastructure assets.

Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) – identifies Newport as a primary focus for growth and investment in South East Wales.

Planning Policy Wales (Edition 12) 2024

5.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

5.5 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural wellbeing of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic duty.

5.6 The following paragraphs within the PPW are considered relevant to the proposed change of use.

5.7 Paragraph 5.4.2 – supports maximising opportunities for economic development and strengthening the foundational economy.

5.8 Paragraph 5.4.4 – encourages development that supports economic prosperity and growth.

- 5.9 Paragraph 5.4.13 - promotes the reuse of previously developed land and underutilised sites.

Technical Advice Notes (TAN)

- 5.10 The following technical advice notes (TAN) are also relevant:

- TAN 11: Noise
- TAN 15: Development, Flooding, and Coastal Erosion
- TAN 23: Economic Development

The Development Plan

- 5.11 The Development Plan for the site comprises the Newport Local Plan 2011-2026.
- 5.12 Newport City Council is preparing a Replacement Local Development Plan (RLDP) to cover the period 2021-2036. Following the 2022 consultation, there have been no formal updates.

Newport Local Plan 2011-2026 (Adopted 2015)

- 5.13 These are the relevant objectives and policies from the Newport Local Plan:

- **Objective 3** – Economic Growth
- **SP1** – Sustainability
- **SP2** - Health
- **SP3** – Flood Risk
- **SP9** – Biodiversity
- **SP18** – Urban Regeneration
- **GP1** – Climate Change
- **GP2** – General Amenity
- **GP4** – General Development Principles
- **GP6** – Quality of Design
- **GP7** – Environmental Protection and Public Health
- **T4** – Parking

Site Specific Policies and Designations

- 2.10 The Policies Map confirms the Site is located within the Communities First 'East Cluster' area.

- 2.11 The Site is located within Flood Zone C1 under TAN 15, and is in proximity to Flood Zone C2 to the southeast. The Site is also adjacent to areas covered by TAN 15 Flood Risk and Coastal Erosion mapping.

6.0 Planning Assessment

6.1 This section assesses the Proposed Development against the relevant national, strategic, and local planning policies. It assesses the following key planning considerations in turn:

- Principle of Development;
- Effect on Character & Amenity;
- Parking & Highways;
- Flood Risk & Sustainable Drainage; and
- Biodiversity

Principle of Development

- 6.2 The Site comprises an established commercial premises in lawful Class B1 use as longstanding auto centre. This is a key material consideration and demonstrates that the Site is well suited to vehicle related uses.
- 6.3 The proposal seeks to extend the existing lawful use to include Class B2 to facilitate MOT testing. This represents a logical and complementary extension of the established automotive use and would not introduce a fundamentally different form of development. The operational characteristics of MOT testing are closely aligned with the existing use in terms of scale, activity, and vehicle movements.
- 6.4 At the national level, PPW supports sustainable economic growth, the strengthening of the foundational economy, and the efficient use of previously developed land. In particular, Paragraphs 5.4.2, 5.4.4 and 5.4.13 support the continued productive use of existing commercial sites and the reuse of developed land in sustainable locations.
- 6.5 The proposal accords with Future Wales, which identifies Newport as part of a National Growth Area, where economic development and investment in employment uses should be supported and directed to sustainable locations.
- 6.6 At the local level, the Newport Local Development Plan supports the retention and enhancement of employment uses. Objective 3 and Policy SP18 promote economic growth and urban regeneration, while Policy SP1 encourages the efficient use of previously developed land. The Site is located within an accessible urban area with good public transport links, reinforcing its suitability as a sustainable employment location.
- 6.7 Overall, the proposal represents a modest and proportionate extension of an existing employment use, which would support continued economic activity and make efficient use of an established commercial site.

Effect on Character & Amenity

- 6.8 Policy SP2 seeks to ensure development is located in sustainable areas with good access to transport and services. The Site is within an established commercial area on Corporation Road and benefits from good public transport accessibility, including nearby bus routes. The proposal is therefore sustainably located.

- 6.9 Policy GP2 requires that development does not result in unacceptable impacts on amenity or the character of the surrounding area.
- 6.10 The introduction of MOT testing is closely aligned with the existing automotive use of the Site. Activity levels, vehicle movements, and operational characteristics would remain broadly comparable. Given the mixed use context and proximity to a main road, the proposal would not result in any significant adverse impacts on residential amenity.
- 6.11 In this regard, the proposal accords with TAN 11: Noise, with any operational noise capable of being appropriately contained within the existing building and commercial context.
- 6.12 Policy GP7 seeks to prevent unacceptable impacts on health, amenity, and the environment. Any impacts associated with the proposed use would be localised, typical of vehicle related operations, and consistent with the Site's established use.
- 6.13 No external alterations are proposed. The appearance, scale, and character of the building and wider area would remain unchanged. The proposal would not introduce issues relating to crime, safety, or accessibility, and existing access arrangements would be retained.
- 6.14 Policy GP6 requires high quality design that responds to context. As a change of use only, the proposal would not affect the built form and would maintain the established layout and function of the Site. The continued reuse of the existing building also aligns with sustainability objectives.
- 6.15 Overall, the proposal would not result in any unacceptable impacts on character or amenity and is compliant with relevant development plan policies.

Parking & Highways

- 6.16 Policy GP4 requires development to provide safe and suitable access and appropriate parking provision without causing harm to highway safety or capacity. Policy T4 requires parking provision to accord with adopted standards.
- 6.17 The proposal does not involve any changes to access arrangements or parking provision. Vehicular and pedestrian access would continue via Corporation Road, and existing parking provision would be retained.
- 6.18 The Site has historically accommodated automotive uses, and the existing level of parking is considered sufficient to serve the proposed MOT testing use. Trip generation is expected to be broadly comparable to the existing lawful use and would not result in a material impact on the surrounding highway network.

Flood Risk & Sustainable Drainage

- 6.19 Policy SP3 requires development to avoid areas at risk of flooding and not increase flood risk elsewhere.
- 6.20 The Site lies within Flood Zones 2 and a TAN 15 Defended Zone (C1). However, the proposal relates solely to a change of use with no operational development or intensification of built form.

- 6.21 The proposed use falls within the less vulnerable development category and is therefore acceptable in flood risk terms. The development would not increase flood risk on site or elsewhere.

Biodiversity

- 6.22 Future Wales Policy 9 and LDP Policy SP9 require development to protect and, where possible, enhance biodiversity and ecological networks.
- 6.23 The Site comprises entirely of hardstanding with no ecological features of significance. The proposal does not involve any physical works. As such, there would be no adverse impact on biodiversity or green infrastructure.

7.0 Flood Risk Consequences Assessment

- 7.1 The application site is located within an area identified as being at risk of flooding. The Planning Policy Map confirms that the site lies within Flood Zone C1 (defended floodplain) under Technical Advice Note 15 (TAN 15).
- 7.2 Flood Risk Assessment Wales further identifies that the site falls within Flood Zone 2 (low to moderate risk of flooding from the sea) and benefits from existing flood defence infrastructure. TAN 15 defines C1 zones as areas of the floodplain which are developed and served by significant infrastructure, including flood defences designed to provide a minimum standard of protection (typically up to the 1 in 100-year event for rivers, including an allowance for climate change and freeboard).
- 7.3 The Flood Map for Planning (which incorporates future climate change allowances) identifies the site within Flood Zone 3 (rivers and sea), with a very small part of the site also susceptible to surface water flooding (Flood Zone 2).
- 7.4 Notwithstanding the above designations, the proposed development is a change of use within the same 'less vulnerable' category (B1 to B1/B2), with no additional floorspace and no physical works which would impede on flows, it would not increase flood risk, vulnerability, or impact on flood path.
- 7.5 In addition, the site has been in long standing commercial use and is already fully developed, comprising built form and hardstanding.
- 7.6 TAN 15 advises that the level of detail required for a Flood Consequences Assessment should be proportionate to the nature and scale of development proposed. In this instance, given that the proposal is limited to a change of use with no physical works and no alteration to the flood risk characteristics of the site, the preparation of a detailed standalone FCA is not considered necessary to demonstrate policy compliance.
- 7.7 The proposal would therefore result in a neutral impact in flood risk terms, maintaining the existing situation while enabling the continued viable use of an established employment site in a sustainable location.
- 7.8 On this basis, the development is considered to comply with the requirements of TAN 15 and Policy SP3 of the Newport Local Development Plan and is acceptable in flood risk terms.

8.0 Summary and Conclusions

- 8.1 This application seeks permission to extend the Site's lawful use to include Class B2 (General Industrial) to enable MOT testing alongside the existing Class B1 use. The proposal involves no physical alterations and relates solely to a change of use of an existing commercial premises.
- 8.2 The Site is an established automotive centre, and the proposed use is closely aligned with its current operation. It represents a logical and complementary extension of the existing lawful use.
- 8.3 Planning permission reference 26/0039 approved alterations to facilitate MOT testing and the officer report clearly advised that a separate application would be required to extend the lawful use to include Class B2. This application responds directly to that advice.
- 8.4 The proposal accords with national and local planning policy, supporting sustainable economic growth, efficient use of existing employment land, and continued use of a sustainably located urban site.
- 8.5 The assessment demonstrates no unacceptable impacts in terms of character, amenity, highways, flood risk, or biodiversity.
- 8.6 Overall, the proposal is a modest and appropriate extension of an established use and should be supported. It is therefore respectfully requested that planning permission be granted.

London
Birmingham
Bournemouth

0203 664 6755
enquiries@torandco.com
torandco.com

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