

Retail Statement

Our reference no: 260107A

Date of statement: March 2026

Site address: 17-21 Wharf Road, Newport

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

Client: AJ Tech Design

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1. Introduction

- 1.1. This Retail Statement (the ‘Statement’) has been prepared by MA Planning Consultancy on behalf of the Applicant to inform a planning application for a change of use to a convenience store (Use Class A1) (‘the Proposed Development’ or ‘Proposal’). The Proposal is located at 17-21 Wharf Road, Newport, NP19 8ET (‘the Site’). The planning application is to be determined by Newport City Council (‘the Council’).
- 1.2. This document comprises a Retail Sequential Test Assessment (‘Sequential Test’) and a Retail Needs Assessment (‘Needs Assessment’). It provides an assessment of potential sequentially preferable sites and an analysis of the Proposal’s retail impact on the relevant defined centres within the ‘catchment area’.
- 1.3. The methodology used observes the local and national planning policy requirements and is proportionate to the proposed development (a key principle related to such assessments).
- 1.4. This document should be read in conjunction with all documents and drawings submitted alongside the planning application.

2. The Site and Context

Application Site

- 2.1. The application site comprises Nos. 17–21 Wharf Road, Newport. The Site is triangular in form and comprises an existing building, currently vacant, together with associated areas of hardstanding. The Site occupies a visually prominent position within the street scene and is bounded by Wharf Road to the west, Archibald Street to the south, and adjoining residential development and ancillary hardstanding to the east and north. The Site has two access points and parking areas on both Wharf Road and Archibald Street. To the south of the Site there is the South Wales main railway line.
- 2.2. The Site is situated roughly 1 km to the east of Newport city centre, within an established urban area characterised by a mix of residential and commercial uses. The immediate context comprises the principal road corridor formed by Wharf Road and Chepstow Road to the north and west of the Site. Maindee District Centre, located only 60 m to the north west of the site along Chepstow Road, comprises a wide range of services and facilities associated with town centres, including public houses, restaurants, convenience stores, newsagents, barber shop, fast food takeaways, betting shops, among others.
- 2.3. In terms of accessibility, the Site is approx. 150 m from bus stops located along Chepstow Road which provide a wide range of frequent and regular bus services, including to Newport city centre, Ringland, Chepstow, Magor, Monmouth, Liswerry, Underwood, and intermediate stops (bus nos. 5, 6, 8A/8C, 9C, 73, 74/74A, and X60).



Figure 1: The location of the Site (outlined in red) within its local context.

The Proposal

- 2.4. The development subject to this planning application comprises the change of use of the former windscreen repair centre comprising 285 sqm to an ethnic produce convenience store, together with associated external alterations to the building. The supporting information confirms that the intended occupier is a Turkish food store with the total proposed retail net sales floorspace of approximately 133 sqm.
- 2.5. The proposed layout shows the grocery store accommodated at ground floor level, with the sales area comprising food counters and shelving. Ancillary rooms are proposed at first floor level, including storage, an office, staff room and bathroom. To the rear of the building, the Proposal includes cycle storage, customer parking and a bin store, with servicing and access taken from Archibald Street.
- 2.6. In addition to the internal reconfiguration of the building, the Proposed Development includes a series of external alterations comprising a hip-to-gable roof extension over the main roof, alterations to openings, the replacement of a flat roof with a pitched roof to the rear, and the installation of roller shutters to the front ground floor openings.

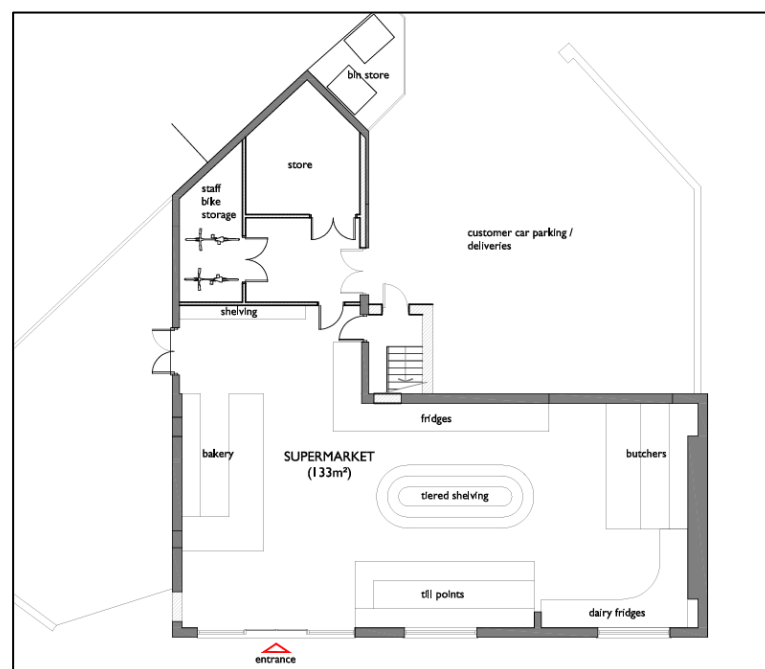


Figure 2: Extract of the proposed ground floor plan.

- 2.7. The Proposal is intended to operate as a small-scale ethnic produce convenience store which would provide a specialist Turkish / ethnic food offer. The store would provide a range of goods intended to complement the existing convenience offer in the wider area, including fresh Turkish bread and pastries, halal meats, traditional deli items, imported dry goods and ready-to-eat meals.

3. Retail Planning Policy Context

3.1. This section sets out the planning policy background of the Proposal in relation to national and local planning policy guidance. The following documents are considered central in assessing the proposed development from a retail planning perspective:

- Future Wales: The National Plan 2040
- Planning Policy Wales (2024)
- Technical Advice Note 4 (2016)
- Newport Development Plan (2015)
- Newport Proposals Map
- Newport Retail and Leisure Study (2019)
- Newport Retail and Leisure Study Addendum (2023)
- District Centres Background Paper (2013)

Future Wales: The National Plan 2040

3.2. Future Wales was published in February 2021 and is the national development framework, guiding development in Wales in the period to 2040. Its focus is on national priorities, and it sets key criteria for the assessment of development, which are then to be applied within policies set at the more local level.

3.3. Policy 6 emphasises the ‘town centres first’ principle that is well established and well-known, and makes it clear that the same approach should continue to be adopted. Although the Policy itself is focused on ‘significant’ new development, the supporting text makes it clear that planning authorities should take a similar approach for smaller development.

Planning Policy Wales (Edition 12)

3.4. Planning Policy Wales (PPW) is the principal national planning policy document that sets out the land use policies of the Welsh Government, against which development proposals must be assessed. The latest edition, the twelfth, was published in February 2024. The PPW is supported by a series of Technical Advice Notes (TANs) which will be discussed in more detail below.

3.5. National policy applying to proposals related to retail development is set out in Chapter 4 (Retail and Commercial Development) of the PPW.

3.6. Paragraph 4.3.3 states that the Welsh Government’s objectives for retail and commercial centres are to:

- Promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;

- Sustain and enhance retail and commercial centre’s vibrancy, viability and attractiveness; and
 - Improve access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.
- 3.7. Paragraph 4.3.18 states that the Welsh Government operates a ‘town centre first’ policy in relation to the location of new retail and commercial centre development. The same paragraph states that *“in implementing this policy planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses”*. By adopting this approach, the first preference should be to locate new development within a retail and commercial centre, defined in the development plan hierarchy of centres.
- 3.8. PPW Paragraph 4.3.14 continues that in deciding whether to identify sites for comparison, convenience or other forms of retail uses in development plans, or when determining planning applications for such uses, planning authorities should first consider whether there is a need for additional retail provision.
- 3.9. PPW Paragraph 4.3.26 states that all retail planning applications or retail site allocations of 2,500 sqm or more gross floorspace that are proposed on the edge or outside designated centres should, once a need has been established, be supported by a retail impact assessment.

Technical Advice Note 4

- 3.10. TAN 4 specifically relates to retail and commercial development. Objective 1 reflects the ‘town centre first’ approach outlined by the PPW and states that viable urban and rural retail and commercial centres need to be promoted as the most sustainable locations to live, work, shop, socialise and conduct business.
- 3.11. Part 6 of TAN4 sets out the retail need tests. The retail need tests are of a quantitative and qualitative nature, and are required to be undertaken for any application in an ‘edge of centre’ or ‘out of centre’ location that is not in accordance with an adopted development plan. It also notes that this is the starting point for planning new retail development in both development plans and development management.
- 3.12. Paragraph 6.3 clarifies that there is no particular methodology prescribed by the Welsh Government and, instead, developers and local authorities are encouraged to prepare assessments in a clear, logical and transparent way, with robust and realistic evidence.
- 3.13. Paragraph 6.5 confirms that quantitative retail need should be established *before* other, qualitative aspects of need are considered. Paragraph 6.6 continues that the latter is harder to justify and will be subject to close scrutiny. It notes that the overall aim of assessing qualitative need is to achieve an

appropriate distribution and range of sites for stores to meet the need of all communities, particularly where provision is inadequate.

- 3.14. Part 7 identifies the sequential test approach, which requires that only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out of centre options within, and then outside, a settlement area be considered.
- 3.15. Paragraph 7.4 provides guidance on the application of the sequential test, noting that edge of centre proposals should not normally be located more than 200 to 300 metres from the edge of the centre.
- 3.16. The same paragraph also states that the size of the retail and commercial centre, local topography and presence of physical barriers to access may influence any assessment. For example it may limit the area that can be considered edge of centre for a smaller more constrained centre.
- 3.17. Paragraph 7.5 continues that “*developers and retailers should be flexible and innovative about the format, design and scale of the proposed development and the amount of car parking needed, tailoring these to fit local circumstances*”.
- 3.18. Paragraph 8.2 outlines the requirements for retail impact assessments. Retail proposals comprising 2,500 sqm gross located in edge or out of centre locations should be supported by a retail impact assessment. In this instance, the Proposal comprises 285 sqm of retail floorspace and therefore the need for an impact assessment is not triggered.

Newport Development Plan (2015)

- 3.19. The Newport Development Plan (NDP) was adopted in 2015 and comprises the framework for future development needs across the city. The NDP identifies where development will take place, how new jobs will be supported, and how the environment of the City will be protected and enhanced.
- 3.20. Inter alia, NDP Policy SP19 states that retail and associated proposals located in out of centre locations will need to undertake an assessment of need. The policy also sets out the hierarchy of centres as set out below:
 - 1. Newport city centre
 - 2. District centres
 - 3. Local centres
 - 4. Out of centre retail sites
- 3.21. Policy R8 (Small Scale Retail Proposals) states, among other things, that proposals for new local retail facilities outside the city and district centres will only be permitted if they meet the following criteria:
 - i. New residential development would be served or the provision would cater for under-provision in the area;

- ii. The proposal is of a scale appropriate to the locality
- iii. There would be no adverse effects on the viability and vitality of any defined centre;
- iv. there would be no unacceptable effect on the local residential amenities or the general character of the area in terms of noise and disturbance or extra traffic generated.

4. Need Assessment

Methodology

- 4.2. While the Site is not located within a defined centre, it is located approx. 60 metres from Maindee District Centre, and therefore in an edge of centre location. Therefore, the Proposal is subject to the requirement for a retail need assessment, as set out by PPW, TAN4, and NDP Policy R8.
- 4.3. In undertaking this process, we have adopted the 'existing' turnover of convenience goods facilities based on the results of the household survey which underpinned the Newport Retail and Leisure Study (2019) (NRLS).
- 4.4. Drawing on the empirical data provided within the NRLS, we have adopted a conventional step-by-step, trade draw methodology to assess retail need. This is based on the estimate of store turnover (and supporting catchment area expenditure) in the 'design year' and a series of judgements (informed by the evidence base) relating to the proportion of turnover estimated to be diverted from existing centres and stores within the catchment area.
- 4.5. As part of the needs assessment, various other factors have been considered, such as scale, nature of retail offer, location/distance, and extent of existing trading overlap (or 'competition'), underpinned by the principle of 'like competing with like'.
- 4.6. This methodology is widely applied in retail assessment work and reflects the approach advocated by relevant planning policy and guidance such as TAN4. This approach is considered logical, robust, transparent and proportionate.
- 4.7. There are four main steps underlying this approach:
 - Step 1: define a catchment area and quantify population and spending
 - Step 2: Identify base and design years for the assessment
 - Step 3: Estimate the turnover of existing centres and retail destinations
 - Step 4: Identify the benchmark turnover of existing facilities based on published information relating to company average turnover, and compare this with survey derived turnover. This provides an assessment of retail floorspace capacity and therefore 'need' for additional floorspace.

Base and Design Years

- 4.8. For the purposes of the need assessment, **2026 is used as the Base Year**. The NRLS alongside evidence provided by Experian, PROMIS and other leading data

providers will be used as the basis for analysis of relevant expenditure, shopping patterns, turnover figures and capacity need.

- 4.9. The Proposed Development relates to a full planning application with a formal decision expected to be issued in Q2 or Q3 of 2026. Subject to appropriate planning conditions being discharged in a timely manner, it is expected that the Proposal can be completed within a year of a favourable decision, thus between Q2 and Q3 2027. On this basis, and applying a two year timescale to account for the development to become 'mature', a **2029 'Design Year' was used.**

Population Figures

- 4.10. For population figures, this assessment has used the ONS-based data as population forecasts for the Base Year, Maturity Year and Consolidation year. Regard was also given to the findings of the Census 2021 data to ensure robust findings.

Area of Assessment

- 4.11. In defining a suitable catchment area that is proportionate to the scale of the proposed development for the purposes of undertaking the need assessment, consideration has been given to the core area that the Proposal is expected to serve.
- 4.12. The Proposed Development is for 285 sqm convenience store with a sales area of 133 sqm that will provide a specific convenience retail offer focused on produce from a specific geographical region, Turkey.
- 4.13. The typical locational strategies for such convenience stores located in urban and suburban locations, such as the Site, is to serve an area that typically equates to a 10- to 15-minute walking distance from the store.
- 4.14. For completeness, taking into account the operational requirements and business strategy of the Proposal, it is considered appropriate and proportionate to use a 15-minute walking time as the catchment area (a roughly 1.2 km radius), which encapsulates the following defined centres:
- Beechwood District Centre;
 - Caerleon Road District Centre;
 - Corporation Road District Centre;
 - Maindee District Centre; and
 - Clarence Place Local Centre.

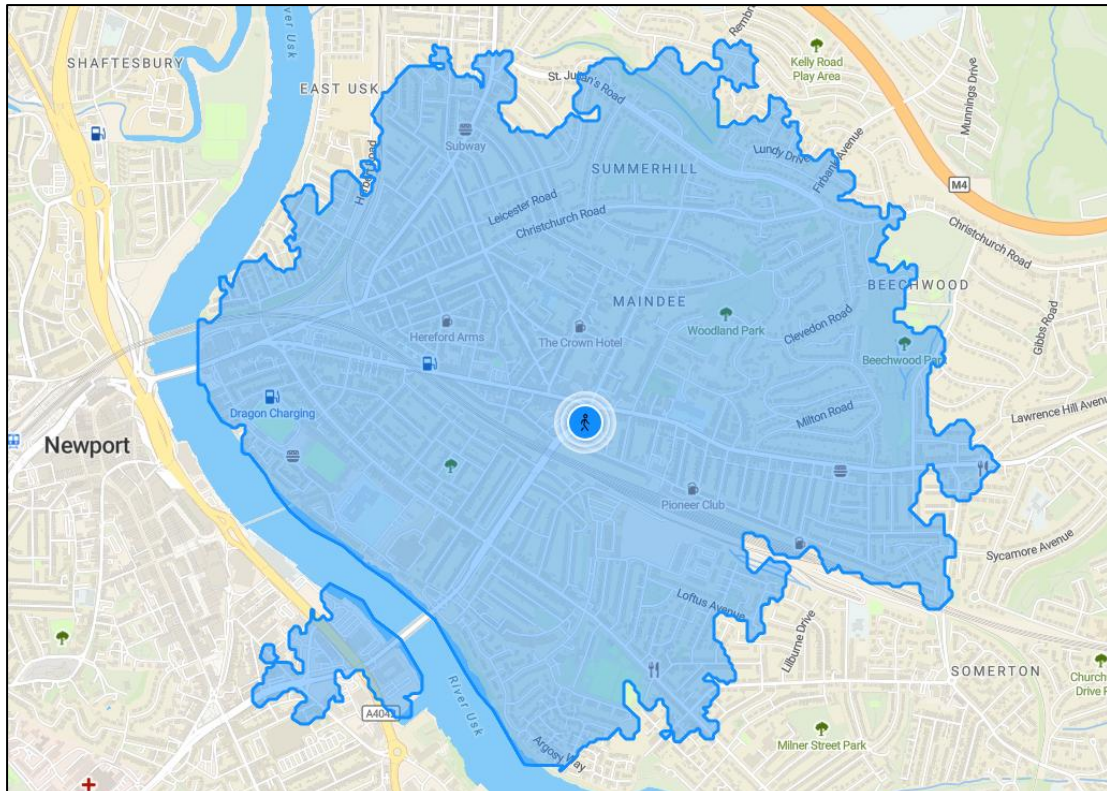


Figure 3: Map highlighting (in blue) the Proposal's 15-minute walking time catchment area.

- 4.15. The assessment needs to look forward into the Design Year and assess the retail destinations within the 'catchment area' by using forecasted figures from the NRLS and other supporting data.

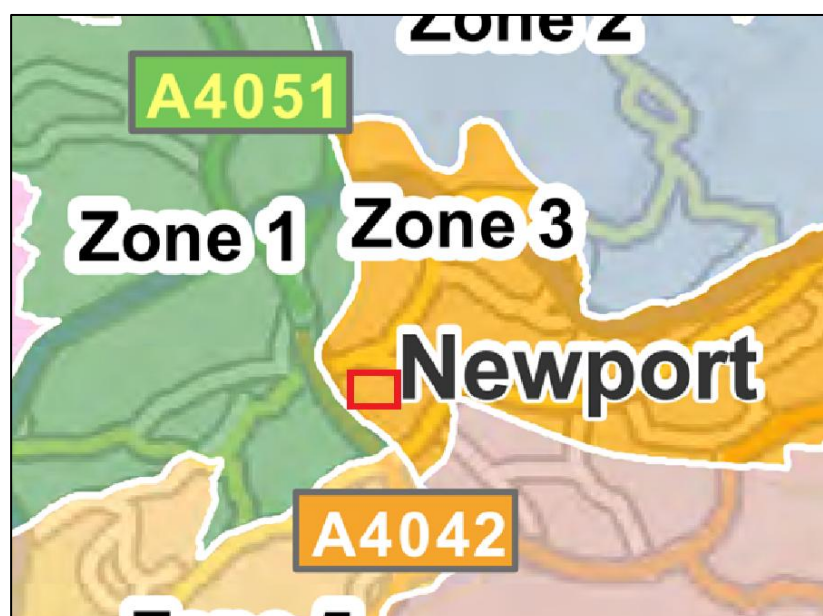


Figure 4: Extract from NRLS with the Site outlined in red showing how it, and its associated catchment area sit almost entirely within Study Zone 3.

Assessment of Study Area

4.16. The defined centres within the ‘catchment area’ will be analysed using the following quantitative and qualitative indicators, as available (non-exhaustive list):

- Context
- Accessibility
- Diversity of uses
- Retail representation
- Vacancy levels
- Market conditions
- Capacity need
- Environmental qualities

4.17. The following main sources were used, where relevant, to undertake this assessment:

- Property Market Information Service (PROMIS)
- Commercial, Leisure & Community Commitments Monitor (2022)
- Local Data Company ‘Looking Beyond Lockdown’ (2021)
- Google Maps & Street View
- GlobalData Convenience and Comparison Goods Sales Densities of Major Grocers – 2024
- Social Media data
- Office for National Statistics – Retail Industry;
- Local Plan Policies Map
- Google Maps & Street View

Retail context

4.18. To fully consider the Proposal’s impact on the catchment area, it is important to understand the wider retail context in south Wales and UK. The retail and commercial leisure market has been undergoing significant restructuring, driven by long-term trends and recent global events such as the 2008 financial crisis and the Covid-19 pandemic. Online sales have risen, leading to reduced demand for physical retail spaces, which are increasingly being converted for alternative uses. The pandemic, in particular, accelerated these trends, resulting in high street closures and changes in consumer behaviour.

4.19. Brexit further compounded the economic challenges, with the UK’s slow economic growth in 2019 attributed to uncertainty surrounding Brexit negotiations. This uncertainty continues to affect business investment and supply chains. While retail sales volumes are expected to improve, they are likely to remain below pre-pandemic levels as households and businesses face financial strain. The long-term impact of Brexit will depend on the evolving UK-EU trading relationship.

- 4.20. The Russia-Ukraine conflict added another layer of complexity, driving inflation, particularly in food prices, and causing supply chain disruptions. Retail sales saw an initial boost as Covid-19 restrictions eased, but the cost-of-living crisis and rising prices have dampened consumer spending. The trend of store closures continued in 2022/23, albeit at a slower rate than in previous years, reflecting the ongoing decline in demand for physical retail spaces. Retail parks, however, have shown resilience due to their convenience and lower rents.
- 4.21. The market share of special forms of trading (SFT), such as online shopping, is expected to continue growing, particularly in the comparison goods sector, reducing the need for physical retail space, albeit, in the retail convenience sector, most SFT sales are undertaken via 'click and collect' or home delivery directly from existing stores and, therefore, still heavily reliant on traditional retail floorspace.
- 4.22. Retail rents have also declined significantly, giving new operators opportunities in previously expensive locations, though landlords face challenges due to lower income and investment values. The convenience retail sector has seen shifts as well, with the dominance of traditional supermarket chains challenged by discount retailers like Aldi and Lidl, who have expanded their market share by diversifying their offerings and opening more stores.

Assessment of Existing Centres

Qualitative Assessment

- 4.23. The following section analyses the current retail and leisure context of the defined centres within the 'catchment area', also referred to as the catchment area, and subsequently assesses the Proposal's impact on the vitality and viability of these centres.

Beechwood District Centre

Retail context and environmental quality

- 4.24. Beechwood District Centre is located to the east of Newport City Centre and performs an important local shopping and service function for the surrounding residential area. The centre is linear in form, with units concentrated along one side of Chepstow Road, which serves as a busy main route into and out of Newport. Its prominent roadside location provides a good degree of visibility and accessibility, supporting its role as a convenient destination for day-to-day needs.
- 4.25. The centre accommodates a varied mix of independent retailers and service businesses, contributing to a distinctive and locally focussed offer. While relatively modest in scale, the centre includes a range of convenience, comparison and service uses which together support its ongoing vitality. Its retail composition appears to complement, rather than compete directly with, the

nearby City Centre and Newport Retail Park, particularly given the presence of several specialist comparison retailers.

- 4.26. Although the centre does not have the wider leisure, cultural or civic role associated with larger town or city centres, it benefits from a clear commercial frontage and an active mix of businesses that help sustain activity throughout the day. The concentration of shops and services in a compact arrangement also reinforces its convenience for local residents.
- 4.27. Overall, Beechwood District Centre appears to function effectively as a local service hub. Its accessible location, diverse mix of independent and specialist operators, and relatively low vacancy rate indicate that it continues to serve the everyday needs of the local population and remains a viable and important district-level centre.



Figure 5: Extract of the NRLS showing the unit composition of Beechwood District Centre.

Diversity of Uses

- 4.28. Beechwood District Centre comprised 32 units at the time of the 2018 survey, representing a slight increase from 31 units recorded previously. Convenience uses accounted for 12.5% of units, equating to four units, and remained stable compared with the earlier survey. These uses include a Spar, a bakery and other independent traders, which together contribute to the centre's day-to-day convenience role.
- 4.29. Comparison retailing accounted for 25.0% of units, or eight units, increasing from 19.4% previously. These uses include a pharmacy, bed shop, textiles shop and a number of specialist retailers such as a cycle shop and piano shop. The specialist nature of many of these operators provides a complementary offer to higher-order nearby centres, rather than directly competing with them.
- 4.30. Service uses form a significant component of the centre's overall composition. Retail services accounted for 28.1% of units, comprising nine units including hairdressers, beauty businesses and dry cleaners. Leisure services also

represented 28.1% of units, with provision including a large gym alongside several takeaways and restaurants. Notably, there were no financial or business service uses recorded within the District Centre at the time of the survey.

- 4.31. Taken together, service uses made up 56.2% of all units in the centre, increasing from 54.8% previously. This suggests that vacant premises have increasingly been reoccupied by service-based uses, rather than additional convenience or comparison retail operators. This is a logical outcome in the context of the centre's proximity to Newport City Centre and Newport Retail Park, which are likely to remain the principal focus for broader retail provision.
- 4.32. Vacancy levels in the centre were relatively low, with just two vacant units recorded, representing 6.3% of the total. This marks an improvement from the previous survey, when four vacant units were identified, equivalent to 12.9% of units.
- 4.33. In summary, Beechwood District Centre appears to be performing well as a district-level centre. It benefits from a strong proportion of independent and specialist retailers, a substantial service offer, and an improving vacancy rate. Taken together, these characteristics indicate that the centre continues to meet the day-to-day needs of the local population and maintains a healthy and complementary role within Newport's wider network of centres.

Caerleon Road District Centre

Retail context and environmental quality

- 4.34. Caerleon Road District Centre is located to the east of Newport city centre and performs an important local shopping and service role for the surrounding residential area. The centre is linear in form, with units arranged along one side of Caerleon Road, a busy route connecting Caerleon with Newport City Centre. This prominent roadside position provides good visibility and supports the centre's function as a convenient destination for day-to-day shopping and service needs.
- 4.35. The centre accommodates a varied mix of independent businesses alongside a number of national retailers, contributing to a balanced and accessible local offer. Its proximity to both Newport City Centre and Newport Retail Park influences its role and composition, particularly in retail terms, with the centre appearing to fulfil more of a complementary convenience and service function rather than acting as a destination for higher-order comparison shopping.
- 4.36. Overall, Caerleon Road District Centre appears to function effectively as a local service hub. Its combination of convenience provision, service uses, independent operators and selected national retailers, together with a relatively stable vacancy rate, indicates that it continues to meet the day-to-day needs of the local population.

Diversity of Uses

- 4.37. This section of the report has been informed by the District Centre assessment contained within the NRLS, including the composition data for Caerleon Road District Centre and the accompanying qualitative assessment of the centre's role and function.



Figure 6: Extract of the NRLS showing the unit composition of Caerleon Road District Centre

- 4.38. Caerleon Road District Centre comprised 41 units at the time of the 2018 survey, compared with 42 units recorded in 2010. Convenience retail accounted for six units, representing 14.6% of the total, which is broadly consistent with the previous survey. These uses include Spar, a bakery, Greggs and a number of other independent convenience traders, all of which contribute to the centre's day-to-day shopping function.
- 4.39. Comparison retailing accounted for nine units, or 22.0% of the total, representing a decline from 11 units, or 26.2%, in 2010. The comparison offer includes, amongst others, Boots, a pharmacy, a sports shop and a florist. Given the centre's proximity to Newport City Centre and Newport Retail Park, both of which provide a substantial comparison retail offer, this more limited level of comparison representation is to be expected.
- 4.40. Retail services formed a significant part of the centre's composition, accounting for 26.8% of units. These uses include several hairdressers and beauty businesses, as well as an opticians, laundrette and funeral parlour. Leisure services accounted for a further 22.0% of units and were dominated by fast food outlets and takeaways, alongside a public house, restaurant and betting shop.
- 4.41. Financial and business services accounted for two units, or 4.9% of the total, comprising a building society and an estate agent. The presence of both of these uses is notable in a district centre of this size and was identified as relatively

uncommon amongst centres across the wider authority area. Taken together, retail services, leisure services and financial/business services accounted for 53.7% of all units in 2018, compared with 64.0% in the previous survey, indicating a reduction in the overall proportion of service uses.

- 4.42. The vacancy rate within the centre was 9.8% at the time of the survey, with four vacant units recorded. This represents a modest improvement from the 2010 position, when five units, equivalent to 11.9% of the total, were vacant. The slight reduction in vacancy suggests that demand within the centre has remained relatively stable.
- 4.43. In summary, Caerleon Road District Centre appears to be functioning well as a district-level centre. It benefits from a strong mix of independent traders and recognised national operators, particularly in the convenience and service sectors, and continues to meet the day-to-day needs of the local population. Although the proportion of comparison and service uses has changed over time, the centre remains viable and continues to perform an important complementary role within Newport's wider retail hierarchy.

Corporation Road District Centre

Retail context and environmental quality

- 4.44. Corporation Road District Centre is located on a busy main route to the east of Newport City Centre and performs an important local shopping and service role for the surrounding area. The centre is linear in form, with units located on both sides of Corporation Road and bisected by George Street Bridge and Wharf Road. This layout gives the centre a relatively dispersed form, but its prominent position on a well-used route supports its visibility and accessibility.
- 4.45. The centre accommodates a mix of independent traders, specialist retailers and local service businesses, contributing to a varied and functional offer. Its proximity to Newport City Centre and Newport Retail Park influences its role, particularly in retail terms, with the centre appearing to provide a more localised and complementary offer rather than serving as a principal destination for higher-order comparison shopping. Nevertheless, a number of the comparison retailers are of a specialist nature and may provide a more distinctive draw than would otherwise be expected in a centre of this scale.
- 4.46. In environmental terms, the centre appears to function adequately, although the quality of the public realm is more limited than in some other centres. In particular, the absence of vegetation or greenery was noted as detracting from the environmental quality of the area, and the introduction of such features could help enhance the attractiveness of the centre. Notwithstanding this, the active frontage and mix of uses help support a reasonable level of activity and local vitality.
- 4.47. Overall, Corporation Road District Centre appears to be performing an important district-level role. Its improving vacancy rate, strong independent offer and

increased convenience provision indicate that it continues to meet the day-to-day needs of the local population, although there remains scope to improve the quality of the public realm.

Diversity of Uses

- 4.48. Corporation Road District Centre comprised 34 units at the time of the 2018 survey, compared with 32 units recorded in 2009. Convenience retail accounted for eight units, representing 23.5% of the total, which marks a substantial increase from four units, or 12.5%, in the previous survey. These uses include a number of independent convenience traders and a butcher, and their increased representation indicates a strengthening of the centre's day-to-day shopping function.

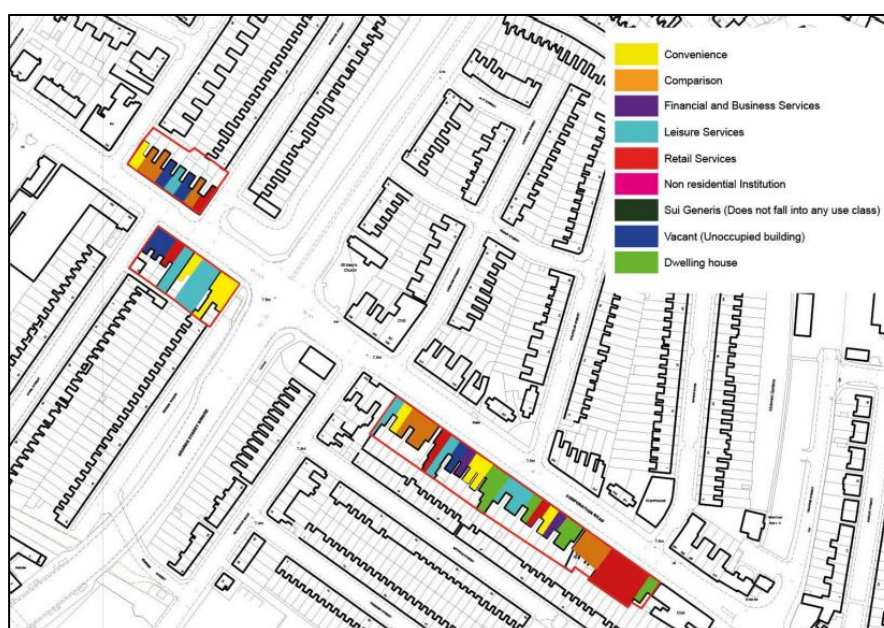


Figure 7: Extract of the NRLS showing the unit composition of Corporation Road District Centre.

- 4.49. Comparison retailing accounted for six units, equivalent to 17.6% of the total, representing a reduction from eight units, or 25.0%, previously. These uses include two clothes shops, alongside retailers selling tiles, furniture, wedding venue decorations and catering equipment. Given the centre's proximity to Newport City Centre and Newport Retail Park, both of which attract a larger concentration of comparison retail, this reduction is not unexpected. However, the specialist nature of many of these businesses means they may continue to provide a particular draw to the centre.
- 4.50. Retail services accounted for five units, or 14.7% of the total, and include several hairdressers, a tattoo parlour and an optician. Leisure services accounted for a further eight units, representing 23.5% of the total, and were dominated by fast food and takeaway uses, with six of the eight units falling within this category. The remainder comprise a restaurant and a betting shop.
- 4.51. Financial and business services accounted for two units, or 5.9% of the total, comprising an accountant and a printer. Taken together, retail services, leisure

services and financial/business services accounted for 44.1% of all units in the centre in 2018, compared with 43.8% in the previous survey. This indicates that the overall proportion of service uses has remained broadly stable over time.

- 4.52. Vacancy levels stood at 14.7% at the time of the survey, with five vacant units recorded. This represents a modest improvement from the previous position, when six units, or 18.8% of the total, were vacant.
- 4.53. In addition, six dwellings are located within the District Centre boundary. As residential uses fall outside the Experian Goad classifications, they are not included within the composition table, but they nonetheless form part of the wider context of the centre.
- 4.54. In summary, Corporation Road District Centre appears to have improved its performance as a district-level centre. It benefits from a strong proportion of independent shops, an increased convenience offer and a modest reduction in vacancy levels, all of which indicate that it continues to meet the needs of the local population. While the centre would benefit from enhancements to the public realm, particularly through the introduction of greenery, it remains a viable and functional component of Newport's network of centres.

Maindee District Centre

Retail context and environmental quality

- 4.55. Maindee District Centre is located to the east of Newport city centre and occupies a prominent position on a main route into and out of the city. The centre is linear in form, with units arranged on both sides of Chepstow Road, together with a smaller number of units located to the rear. Its roadside location and relatively extensive footprint contribute to its role as an important local shopping and service destination.
- 4.56. As the largest of the District Centres assessed in the NRLS, Maindee has historically performed a significant function in serving the day-to-day needs of the surrounding community. The centre accommodates a broad mix of uses, including convenience retail, comparison shops, retail services and a particularly strong leisure offer. This mix contributes to an active and varied centre, although its current composition also reflects changing trading patterns and increased competition from nearby higher-order retail destinations.
- 4.57. The centre's location in relatively close proximity to Newport City Centre and Newport Retail Park has likely influenced its retail role over time, particularly in relation to comparison shopping. While Maindee continues to provide an important local function, the decline in national multiple representation and the rise in vacancies suggest that the centre has experienced some erosion in its retail strength. Notwithstanding this, the leisure and service sectors remain well represented and continue to support activity within the centre.

- 4.58. Overall, Maindee District Centre remains an important and sizeable district-level centre, but there are signs that its vitality and viability have weakened in recent years. While it continues to benefit from a diverse mix of uses and a strong leisure offer, the increase in vacancy levels and reduction in comparison retailing indicate that the centre is facing greater commercial pressure than some other district centres within Newport.

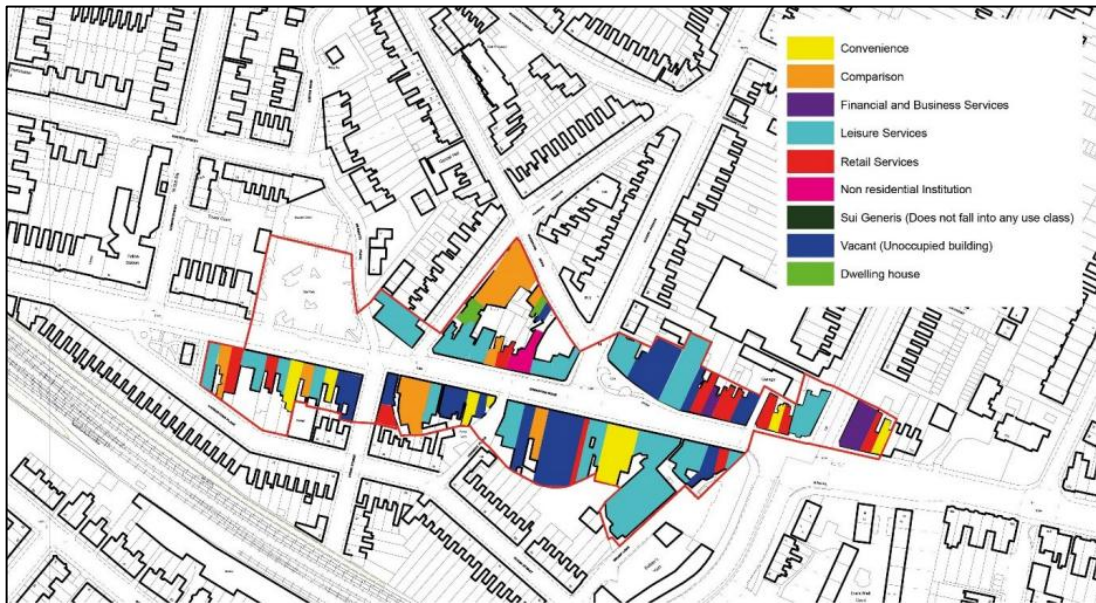


Figure 8: Extract of the NRLS showing the unit composition of Maindee District Centre.

Diversity of Uses

- 4.59. Maindee District Centre comprised 65 units at the time of the 2018 survey, compared with 58 units recorded in 2009, making it the largest of the district centres assessed. Convenience retail accounted for seven units, representing 10.8% of the total, a slight reduction from eight units, or 13.8%, previously. These uses include a range of independent traders, together with a butcher and baker. The reduction in convenience provision reflects, in part, the loss of the former Somerfield supermarket since the earlier survey.
- 4.60. Comparison retailing accounted for eight units, or 12.3% of the total, representing a significant decline from 15 units, or 25.9%, in 2009. The remaining comparison retailers include two menswear shops, two charity shops and a large hardware store located to the rear of Chepstow Road. Given the centre's proximity to Newport City Centre and Newport Retail Park, both of which attract a substantial concentration of comparison retailers, some reduction in this category is not unexpected. However, the scale of decline indicates a notable weakening in this aspect of the centre's offer.
- 4.61. Retail services accounted for 11 units, or 17.7% of the total, and include several hairdressers and health and beauty salons, together with a tattoo parlour and a tailor. Leisure services were more strongly represented, accounting for 22.5 units or 34.6% of the centre's composition. These uses include a large restaurant, a number of public houses, fast food and takeaway outlets, a cat

café, a fitness centre and two betting shops, indicating a broad and active leisure offer.

- 4.62. Financial and business services accounted for two units, or 3.1% of the total, comprising an employment agency and a bank. Taken together, retail services, leisure services and financial/business services accounted for 55.4% of all units in the centre in 2018, an increase from 48.3% in the previous survey. This suggests that service uses now form a more dominant part of the centre's overall composition.
- 4.63. Vacancy levels have, however, increased markedly. At the time of the survey, 14 units were vacant, representing 21.5% of the total, compared with seven units, or 12.1%, in 2009. Although three of the vacant units appeared to be undergoing alterations, the substantial increase in vacancy rates in Newport's largest district centre gives rise to some concern regarding its vitality and viability.
- 4.64. Maindee was previously described in the Council's 2013 District Centres background paper as "*a vibrant centre with a good mix of shops and uses on offer*". Since that time, however, the centre has experienced a significant reduction in comparison retailing, including the loss of national multiple operators such as Boots and Peacocks, as well as the former Somerfield supermarket. Therefore, while the centre retains a strong leisure offer and a reasonable representation of retail services, these changes suggest that its overall health has weakened.
- 4.65. In summary, Maindee District Centre continues to perform an important role within Newport's retail hierarchy, but there are clear indicators that its vitality and viability have come under pressure. The centre still benefits from a sizeable and diverse service and leisure offer, but it has witnessed a sharp rise in vacancies and decline.

Clarence Place Local Centre.

Retail context and environmental quality

- 4.66. Clarence Place Local Centre is located to the east of the River Usk, immediately beyond Town Bridge and within easy walking distance of Newport City Centre. Published material describes it as a defined local centre in a prominent gateway location, bounded in part by rail infrastructure to the north and residential areas to the south and south east.
- 4.67. In environmental and placemaking terms, Clarence Place appears to derive much of its importance from this gateway function and from the presence of historic buildings, rather than from a substantial concentration of retail floorspace. More recent regeneration documents refer to the need for "rejuvenation and reactivation" in Clarence Place, suggesting that while the area remains strategically important, there is scope to strengthen its vitality and overall offer.

Diversity of Uses

- 4.68. Detailed and up-to-date composition data for Clarence Place Local Centre has not been provided in the NRLS. However, earlier Newport evidence indicates that Clarence Place had a relatively limited retail presence, to the extent that the 2010 Colliers retail study concluded that it no longer met the role of a district centre and should instead be considered for reclassification as a local centre.
- 4.69. That position appears to have been reflected in subsequent planning and policy documents, which refer to Clarence Place as a local centre rather than a district centre. A 2019 planning committee report confirms that a site within the defined Clarence Place Local Centre was assessed on that basis. It appears that Clarence Place performs a modest, localised role, likely focussed on a limited range of small-scale commercial and service uses that complement the nearby city centre rather than compete with it. The centre's principal significance appears to lie in its accessible location, heritage setting and regeneration potential.
- 4.70. In summary, Clarence Place appears to function as a small local centre with a constrained retail role but an important locational and townscape function. While the available evidence does not point to a strong or extensive retail offer, the centre occupies a prominent position close to Newport city centre and is recognised in regeneration plans as an area with scope for renewal and improvement.

Quantitative Assessment

- 4.71. A quantitative need assessment of the Proposed Development in terms of the estimated turnover, trade diversion and existing retail floorspace capacity is set out in **Appendix 1** for both convenience and comparison goods.
- 4.72. The assessment has been undertaken (where possible) on a goods-based approach reflecting the primary function and products to be sold from the Proposal.
- 4.73. As set out in Section 2, the Proposed Development seeks to deliver an ethnic convenience store comprising 133 sqm net sales internal area (GIA) as well as staff bike storage, hallway and storeroom.
- 4.74. The assessment follows a standard step-by-step methodology, which can be summarised below.
 - **Study Area** – the study will use the Study Zones 3 of the Newport Retail and Leisure Study (NRLS) Study Area outlined in Appendix A of the NRLS.
 - **Population and Expenditure** – estimation of the population and its spending potential within the Study Area at the base year of 2026 and projected forward to the Design Year.

- **Existing Patterns of Trade** – calculation of the turnover of existing retail locations at the base and design years. These are derived from the results of the household survey underpinning the NRLS.

Population and Expenditure

- 4.75. Using data from Experian (2026), Table 1 of Appendix 1 identifies a total population within the Study Area (Zone 3) of 43,737 persons in 2026, increasing to 44,408 persons by 2029. The population in 2026 is estimated to generate a total of £ 106.4m convenience goods expenditure. This is forecast to increase to £ 107.0 m by 2029 (a marginal growth of £0.4m).
- 4.76. In terms of the split between main and top up convenience expenditure, in 2026 this is identified as £79.8m and £26.6m, respectively, which is forecast to increase to £80.3m for main food shopping and £26.8m for top up shopping.

Retail Market Share

- 4.77. Existing market shares were derived from the market shares informed by the household survey underpinning the NRLS for the main centres/stores that draw trade from within the Study Area (Table 2, Appendix 1). The market shares are then applied to the total expenditure generated (as set out in Table 1, Appendix 1), which in turn provides an overall turnover from within the Study Area for convenience goods (Table 3, Appendix 1).
- 4.78. For convenience goods, the main destination within the Study Area is Tesco Express (Esso), Chepstow Road with a convenience goods expenditure of £3.6m market share of the Study Area. The next main destinations are Tesco Express, Caerleon Road, 'Other, Zone 3', and Spar, Caerleon Road with an expenditure from Study Area of £2.3m, £2.1m and £1.3m, respectively. For 2029, as outlined in Table 4 of Appendix 1, the convenience goods turnover is expected to increase marginally.

Current Retail Capacity

- 4.79. The quantitative evidence must be considered in the context of the type, scale and function of the Proposed Development. The Proposal comprises a small specialist convenience store with a net sales area of approximately 133 sqm, intended to provide a Turkish / ethnic grocery offer including imported dry goods, halal products, fresh bakery items, deli lines and other specialist convenience goods not widely represented in existing mainstream foodstores. As such, the Proposal is not directly comparable with the role and function of a conventional supermarket or large-format convenience store.
- 4.80. The Newport Retail and Leisure Study and its 2023 Addendum identify no strategic quantitative capacity for additional convenience goods floorspace across the authority area over the plan period. However, that finding relates to authority-wide capacity modelling based on existing survey-derived shopping patterns and is directed principally at the allocation of additional mainstream convenience floorspace. It does not preclude small-scale proposals where there

is evidence of local under-provision, qualitative deficiency, or where the proposal would meet a specific day-to-day need not adequately served by existing facilities.

- 4.81. In this regard, the spreadsheet analysis for Zone 3 indicates that the existing convenience destinations within the study area are, in aggregate, not overtrading. On the contrary, the benchmark assessment shows that the identified Zone 3 convenience provision has a combined benchmark turnover of £20.9m in 2026 compared with a survey turnover of £15.7m, indicating an overall undertrading position of -£5.2m. By 2029, the combined benchmark turnover rises to £22.9m, while survey turnover increases only marginally to £15.8m, resulting in a wider overall undertrading position of -£8.0m. These figures suggest that existing convenience expenditure within Zone 3 is insufficient to support the benchmark performance of existing stores and that, in purely quantitative terms, the area is not exhibiting signs of convenience overtrading.
- 4.82. At the level of individual destinations, most existing stores within Zone 3 are shown to be trading below benchmark. In 2026, for example, Spar, Caerleon Road is identified as undertrading by £0.3m, Iceland at Clarence Place by £1.1m, One Stop on Chepstow Road by £1.5m, Costcutter at Ringland Shopping Centre by £1.9m, and One Stop on Caerleon Road by £3.4m. The same broad pattern remains in 2029. The only destination shown to be trading materially above benchmark is Tesco Express (Esso), Chepstow Road, with an overtrading position of £1.1m in 2026 and £1.0m in 2029, whilst “Other, Zone 3” records a modest positive variance of £0.8m in both years. Overall, the quantitative evidence points to a convenience market in Zone 3 that is generally performing below benchmark, rather than one where existing operators are significantly overtrading.

Proposed Development Turnover

- 4.83. The table below (derived from Table 6 of Appendix 1) shows the estimated turnover of the Proposed Development in 2029. This applies a industry standard sales density for small scale convenience store to the net additional convenience goods floorspace proposed.

	Net Sales Area (sqm)	Average Sales Density (£ per sqm)	Estimated Turnover Diverted from Existing Centres/Stores (£m)
Proposed Development	133	6,018	0.8
Total Proposed Development	133	-	0.8

Retail Need

- 4.84. The quantitative evidence should be considered in the context of the type, scale and function of the Proposed Development. The Proposal comprises a small specialist convenience store with a net sales area of approximately 133 sqm, intended to provide a Turkish / ethnic grocery offer including imported dry goods,

halal products, fresh bakery items, deli lines and other specialist convenience goods that are not widely represented in existing mainstream foodstores. As such, the Proposal is not directly comparable with the role and function of a conventional supermarket or large-format convenience store.

- 4.85. The Newport Retail and Leisure Study (NRLS) identifies no strategic quantitative capacity for additional convenience goods floorspace across the authority area over the plan period. However, that conclusion relates primarily to authority-wide modelling of mainstream convenience retail provision and does not preclude small-scale proposals where there is evidence of local under-provision, qualitative deficiency, or where a proposal would meet a specific day-to-day need not adequately served by existing facilities.
- 4.86. As outlined in the preceding section, the benchmark assessment indicates that the existing convenience provision within Zone 3 is generally trading below expected benchmark levels. This suggests that the area is not experiencing significant convenience overtrading and that existing expenditure levels are broadly capable of accommodating a modest additional retail offer without materially affecting the performance of existing stores.
- 4.87. The Proposed Development 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. It is assumed that around 80% of this turnover (£0.6m) would be diverted from existing stores within Zone 3, with the remaining 20% (£0.2m) drawn from expenditure currently spent outside the zone.
- 4.88. In retail composition terms, the Proposal would most appropriately fall within the 'Other, Zone 3' category used within the benchmark assessment rather than within the identified mainstream convenience operators. That category is identified as exhibiting a modest degree of overtrading, and therefore the limited level of trade diversion associated with the Proposal would not materially affect the trading performance of existing convenience destinations.
- 4.89. Overall, the quantitative evidence indicates that the Proposal would operate at a scale proportionate to the local retail market and would not give rise to any significant adverse effects on the vitality or viability of existing centres or stores. Instead, the development would broaden consumer choice by introducing a specialist convenience offer that complements the existing retail provision within the catchment area.

Need Assessment Findings

- 4.90. The quantitative evidence indicates that the need case for the Proposal should not be advanced on the basis that there is substantial quantitative expenditure surplus available to support a further mainstream foodstore. Instead, the Proposal should be understood primarily as responding to qualitative retail need, whilst also operating at a scale that is proportionate to the trading capacity of the local area.
- 4.91. The Proposal has an estimated 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. It is assumed that approximately £0.6m of this would be diverted from within Zone 3, with the remaining £0.2m drawn from expenditure currently spent outside the zone. The Proposal would most appropriately fall within the “Other, Zone 3” category in the benchmark assessment. That category is identified as trading above benchmark by £0.8m in 2029. On that basis, even if the full £0.6m Zone 3 turnover were diverted from that category, it would still leave a modest residual overtrading position of around £0.2m with the Proposed Development in place. This indicates that there is some limited quantitative capacity to accommodate the Proposal.
- 4.92. The principal need case, however, is qualitative. The Proposal would broaden consumer choice by introducing a specialist convenience offer that is not currently well represented in the catchment area. This is particularly relevant having regard to the Proposal’s relationship with Maindee District Centre. Although the Site lies at the edge of the centre, it is clearly connected to its wider commercial area and would be well placed to support linked trips to other shops, services and facilities within the centre. Customers visiting the proposed store are likely, in at least some instances, to combine that trip with visits elsewhere in Maindee district centre, thereby supporting footfall and activity.
- 4.93. That is an important benefit in the context of the NRLS, which notes that the retail role and health of centres such as Maindee has weakened over time. In that respect, the Proposal would help to reinforce the retail offer of Maindee District Centre, adding to its diversity and attractiveness rather than undermining it.
- 4.94. Given its limited scale, specialist function and modest turnover, any trade diversion would be limited in absolute terms and unlikely to materially affect the role, function or viability of existing stores or centres. Instead, the Proposal would provide a complementary retail use in an accessible location, strengthen local consumer choice, and make a positive contribution to the vitality and viability of Maindee District Centre.
- 4.95. On that basis, it is concluded that the Proposed Development meets a clear qualitative need, alongside a limited but identifiable degree of quantitative capacity, and is therefore acceptable in retail need terms.

5. Sequential Test Assessment

Methodology

- 5.2. The Site is located approximately 60 metres (m) to the south east of the nearest defined centre, the Maindee District Centre, and therefore is subject to the ‘sequential test’ as outlined in Chapter 4 of PPW, TAN4 and Policy R10 of Newport LDP.
- 5.3. The PPW confirms that, in reviewing alternative sites, regard should be given to suitability and availability of those sites. These can be defined as follows:
 - **Availability:** whether sites are available now or are likely to become available for development within a reasonable period of time (Determined on its particular merits).
 - **Suitability:** a site or building’s attributes and whether these are sufficient to meet the development requirements of a particular proposal.
 - **Viability:** whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of demonstrating the viability of alternatives depends in part on the need that is to be addressed.
- 5.4. Whilst ‘viability’ is not expressly referenced by PPW or TAN4 in relation to planning applications, it is our view that viability remains relevant to the consideration of whether sites are ‘suitable’ (for completeness we have therefore included viability within our consideration of sequentially preferable sites).
- 5.5. Guidance has also been provided with regard to the application of the sequential test through a High Court judgement relating to an out-of-centre food retail proposal in Mansfield. This judgement builds on a Secretary of State decision relating to a mixed-use retail proposal in Exeter which re-emphasises the ‘town centre first principle’.
- 5.6. Cumulatively, they provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their ‘suitability’ and ‘availability’ and the need for the applicant to demonstrate flexibility. In particular, the Mansfield decision confirms that when reviewing potential alternative sites. The terms ‘suitable’ and ‘available’ mean suitable and available for the “*broad type of development which is proposed in the application by approximate size, type and range of goods*”. This is to include the requirement for flexibility and “*excludes, generally, the identity and personal or corporate attitudes of an individual retailer*”. In terms of ‘availability’, this relates to the site’s availability for the type of retail use for which permission is sought and not to its availability to a particular retailer.

- 5.7. Therefore, the Mansfield decision confirms that the sites covered by the sequential test search should not vary from applicant to applicant depending on the identity or specific retail model proposed. It is clear, for example, that the requirements of an individual retailer, their commercial attitudes, site preferences and competitive preferences should not dictate those sites that are 'suitable' or 'available'. In other words, sequential sites in town centres cannot be dismissed simply because an operator does not wish to compete with its own existing or committed stores located in or close to that centre.

Site Selection Criteria

- 5.8. Paragraph 7.5 of TAN4 states that *"developers and retailers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances."*
- 5.9. On this basis, it is considered that a 20% allowance either way of the development area (0.03 ha) and is appropriate, specifically sites with an area of between 0.02 ha and 0.04 ha.
- 5.10. This 20% flexibility allowance has also been applied to the floorspace of the proposed retail unit; floorspace of between 228 sqm and 342 sqm (20% from the proposed 285 sqm GIA).
- 5.11. In addition, from an operational point of view, as the Proposal relates to a convenience store; any site would need to be able to accommodate adequate parking and access arrangements, including a suitable loading and unloading manoeuvring area. Furthermore, due to the nature of the proposed units, any site would need to be visible and accessible along the highway or adjacent to a major thoroughfare.
- 5.12. Consequently, the following selection criteria (operational, practical and locational requirements) have been identified for the purposes of undertaking the sequential assessment:
- Freehold or leasehold retail, light industrial, leisure or commercial units, or land suitable to accommodate the proposed development;
 - Gross internal floorspace of between 228 sqm and 342 sqm;
 - Site area of between 0.02 ha and 0.04 ha;
 - Site located within or at the edge of the defined centres within the catchment area;
 - Sites capable of accommodating adequate vehicle parking arrangements;
 - Sites capable of accommodating adequate access arrangements;
 - Within a visible and/or accessible location along a major thoroughfare;
 - Good public transport connections; and
 - Avoidance of unacceptable impact on existing residential amenity.

Area of Assessment

- 5.13. In defining a suitable catchment area that is proportionate to the scale of the proposed development for the purposes of undertaking the sequential test assessment, consideration has been given to the core area that the Proposal is expected to serve.
- 5.14. The locational strategy for convenience stores of the scale proposed in urban and suburban locations, such as the Site, is to serve an area that typically equates to a 10- to 15-minute walking time of the store. For completeness, a 15-minute walking time is considered suitable and proportionate to the Proposed Development.

Assessment

- 5.15. This section seeks to assess the results of the sequential test against relevant planning policies identified in the previous section of this document.
- 5.16. The sequential assessment was undertaken between 27 February and 13 March 2026 and assessed available marketed retail, commercial, light industrial and leisure properties or land within the 15-minute walking time catchment area.
- 5.17. The sequential test consists of two stages, with Stage 1 comprising a filtering exercise to discount any sites that are clearly not suitable to accommodate the Proposed Development (e.g. due to site area, or floorspace limitations), or which are not located in sequentially preferable locations i.e. out of centre locations or outside the catchment area. Stage 2 analyses each site that passed the initial filtering exercise (Stage 1 test) in more detail against the relevant criteria and according to the methodology outlined in Section 3 of this document. Finally, Stage 3 assesses in depth any properties or sites that passed the two filtering exercises.
- 5.18. A number of national and local estate agencies' online platforms were used to conduct the search for alternative sites. In addition, engagement with local agents was undertaken, as these agents provide detailed knowledge of the local market and access to opportunities that may not be widely advertised. The following were used in identifying potentially suitable sites:
- Rightmove¹
 - OnTheMarket²
 - Loopnet³
 - JenkinsBest⁴

¹ <https://www.rightmove.co.uk/commercial-property>

² <https://www.onthemarket.com/>

³ <https://www.loopnet.co.uk/>

⁴ <https://www.jenkinsbest.com/>

Stage 1 and 2 Assessments

Estate Agencies

- 5.19. A 1-mile radius was initially used to identify potential sites using the Estate Agent's search tool. It is important to note that the 1-mile radius which extends beyond the 15-minute walking time isochrone catchment area. In addition, floorspace area filters were used to encapsulate, to the nearest denominator, the floorspace criterion.
- 5.20. The search identified a total of 29 marketed properties within the defined search parameters. These sites were reviewed as part of the Stage 1 assessment against the key selection criteria, including site area, available floorspace and location relative to the defined catchment. The full assessment of the sites that were examined, analysed and discounted is provided in **Appendix 2**.
- 5.21. The Stage 1 filtering exercise demonstrated that all marketed properties failed to meet the minimum selection criteria. In most cases, this was because the available floorspace was materially below that required to accommodate the Proposed Development, and/or because the properties were located outside the catchment area or in locations that were not sequentially preferable. A number of the marketed premises also comprised small retail or service units, including hairdressers, restaurants and takeaway units, which would not provide the scale, format or operational characteristics necessary to accommodate the Proposed Development, even if a proportionate degree of flexibility was applied.
- 5.22. Consequently, none of the marketed properties identified through the estate agent search were found to represent suitable and sequentially preferable alternative sites capable of accommodating the Proposed Development.

Sequential Test Findings

- 5.23. The sequential assessment has not identified any suitable and available sequentially preferable alternative sites within the defined catchment area that could accommodate the Proposed Development. This reflects the limited supply of appropriately sized and configured commercial premises within or on the edge of the defined centres within the catchment area.
- 5.24. Whilst a number of marketed properties were identified at Stage 1, the further assessment demonstrates that none of these sites are capable of accommodating the Proposal, even when a proportionate degree of flexibility is applied in respect of floorspace, format and operational requirements.
- 5.25. In many cases, the properties identified through the search were materially below the floorspace required to accommodate the Proposed Development or were otherwise unsuited to a small convenience retail use by reason of their layout, servicing constraints, lack of parking, poor visibility, or their location outside sequentially preferable areas. A number of other premises comprised

small service or food and drink units, the format and characteristics of which would not lend themselves to the type of retail use proposed.

- 5.26. In contrast, the application site is available now, is in an accessible edge of centre location approximately 60 metres from Maindee District Centre, and is capable of being brought forward within a short timeframe. The site is well connected to the surrounding area and lies within easy walking distance of bus stops on Chepstow Road, from which regular services operate to Newport city centre and the wider area.
- 5.27. The application site also shares a close physical and functional relationship with Maindee District Centre. Although it lies outside the defined boundary, it is well connected to the centre and would be capable of supporting linked trips to other shops and services within Maindee. In this regard, the site performs in a manner consistent with the objectives of the town centre first approach, notwithstanding its edge of centre location.
- 5.28. The assessment has therefore demonstrated that there are no suitable, available and sequentially preferable alternatives to the application site. On that basis, the Proposed Development is considered to satisfy the sequential test in accordance with Planning Policy Wales, TAN 4, and the relevant policies of the Newport Local Development Plan.

6. Conclusion

- 6.1. This Retail Statement has been prepared in support of the proposed change of use and associated alterations at 17–21 Wharf Road, Newport, to provide a small specialist convenience store selling Turkish / ethnic grocery goods.
- 6.2. The development would comprise a modestly sized specialist convenience unit in an accessible edge of centre location, closely related to Maindee District Centre, and would be complementary to the current retail offer.
- 6.3. In need terms, the evidence indicates that the case for the Proposal should not be advanced on the basis of substantial quantitative expenditure surplus for a further mainstream foodstore. Rather, the Proposal responds primarily to a qualitative retail need, introducing a specialist convenience offer that would broaden consumer choice and meet a specific local shopping need not adequately served by existing provision. The benchmark analysis also indicates that the Proposal would fall most appropriately within the ‘Other, Zone 3’ category, which shows a modest degree of overtrading. On that basis, there is also a limited but identifiable degree of quantitative capacity to accommodate the development.
- 6.4. In sequential terms, the assessment has identified no suitable and available sequentially preferable sites capable of accommodating the Proposal. Whilst a limited number of properties were identified at the initial stage of the assessment, none were found to represent realistic alternatives when considered in light of the Proposal’s floorspace requirements, layout, servicing needs, accessibility and overall commercial suitability.
- 6.5. The Proposal would not undermine the role, function or viability of the existing centres within the catchment area. On the contrary, given the Site’s close relationship with Maindee District Centre, the development would be likely to support linked trips to existing shops, services and facilities within the centre, thereby contributing positively to its vitality and viability. The Proposal would therefore help reinforce and diversify the District Centre’s wider retail function.
- 6.6. Overall, the Proposed Development represents an appropriate small-scale retail use in an accessible location. It satisfies the retail need and sequential test requirements, and would support the ongoing health of the nearest district centre. The Proposal is therefore considered to accord with the relevant national and local retail planning policy framework and should be supported accordingly.

7. Appendices

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Appendix 1 - Need Assessment - Convenience Goods

Proposed development at 17-21 Wharf Road, Newport, NP19 8ET **IMPACT ASSESSMENT: CONVENIENCE GOODS**

TABLE 0

Experian Data

	Zone 3		
Year	Population Projection	Forecast Expenditure per Person	Experian RPN 22 Growth Rate
2023	42,758	2,683	-2.9%
2024	43,124	2,605	-1.1%
2025	43,443	2,576	-0.2%
2026	43,737	2,571	-0.2%
2027	43,983	2,566	-0.2%
2028	44,182	2,561	-0.1%
2029	44,408	2,558	-0.1%

NOTE:

1. Population projection was informed by Experian 2026 data (ref. Import Data-2026-03-13-08-48)
2. Expenditure growth forecast was informed by RPN 22 (February 2025) (Figure 7) applied to the latest Experian expenditure data (2023).
3. Monetary Values are expressed in 2023 prices.

TABLE 1**ESTIMATED SURVEY AREA POPULATION AND CONVENIENCE GOODS EXPENDITURE**

SURVEY AREA ZONE		3
Population		43,737
Expenditure Per Head (£)		2,571
Total Expenditure with SFT (£m)		112.4
SFT Market Share (%)		5.4%
Total Expenditure without SFT (£m)		106.4
Total Expenditure without SFT (£m) (Main)		79.8
Total Expenditure without SFT (£m) (Top Up)		26.6
Population		44,408
Expenditure Per Head (£)		2,558
Total Expenditure with SFT (£m)		113.6
SFT Market Share (%)		5.8%
Total Expenditure without SFT (£m)		107.0
Total Expenditure without SFT (£m) (Main)		80.3
Total Expenditure without SFT (£m) (Top Up)		26.8

Population Growth:

Population Total 2026-2029		671
Population Total 2026-2029 (%)		1.5%

Expenditure Growth:

Convenience Goods Total 2026-2029 (£m)		0.6
Convenience Goods Total 2026-2029 (%)		0.6%

NOTES:

1. Population and Expenditure derived from Experian specific to the Survey Zone.
2. Expenditure growth in line with Experian RPBN 22 (February 2025).
3. Special Forms Of Trading means trading which does not use traditional retail floorspace, such as online shopping, catalogue etc.
4. SFT market shares was informed from Experian RPBN 22 (Appendix 3).
5. SFT market shares are adjusted for SFT sales from stores (e.g. click and collect).
3. Monetary Values are expressed in 2023 prices.
7. Figures may not cast due to rounding.

TABLE 2**EXISTING CONVENIENCE GOODS MARKET SHARES**

Market Share (%)				
Retail destination	Zone 3		Total	
	Main	Top Up	Main	Top Up
Zone 3				
Spar, Caerleon Road	0.0%	5.0%	0.0%	0.4%
Spar, Chepstow Road (Street shop)	0.0%	0.0%	0.0%	0.0%
Supermarket ABC, Chepstow Road	0.0%	0.9%	0.0%	0.1%
Iceland, Clarence Place	0.0%	0.9%	0.1%	0.1%
Tesco Express, Caerleon Road	0.0%	8.5%	0.0%	0.9%
One Stop, Chepstow Road	0.0%	1.1%	0.0%	0.1%
Costcutter, Ringland Shopping Centre	0.0%	0.9%	0.0%	0.1%
One Stop, Caerleon Road	0.0%	2.2%	0.0%	0.2%
Tesco Express (Esso), Chepstow Rd	3.2%	3.8%	0.3%	0.4%
Other, Zone 3	0.0%	8.0%	0.0%	1.0%
SUB-TOTAL ZONE 3	3.2%	31.4%	0.3%	3.1%
Total outside Zone 3	96.8%	68.6%	99.7%	96.9%
Total reminder of NRLS Study Area	96.2%	68.6%	78.2%	79.2%
Total NRLS Study Area	99.4%	100.0%	78.5%	82.3%
Outside NRLS Study Area	0.6%	0.0%	21.5%	17.7%
TOTAL	100.0%	100.0%	100.0%	100.0%

NOTES:

1. Derived from the Household Survey which underpinned the NRLS - Household Survey
2. Figures may not cast due to rounding.

TABLE 3**CONVENIENCE GOODS TURNOVER AT 2026 WITHOUT DEVELOPMENT**

Market Share (£m)	Zone 3			Total
Retail Destination	Main	Top Up	Total	Main & Top Up
Zone 3				
Spar, Caerleon Road	0.0	1.3	1.3	1.6
Spar, Chepstow Road (Street shop)	0.0	0.0	0.0	0.0
Supermarket ABC, Chepstow Road	0.0	0.2	0.2	0.2
Iceland, Clarence Place	0.0	0.2	0.2	1.2
Tesco Express, Caerleon Road	0.0	2.3	2.3	3.3
One Stop, Chepstow Road	0.0	0.3	0.3	0.3
Costcutter, Ringland Shopping Centre	0.0	0.2	0.2	0.2
One Stop, Caerleon Road	0.0	0.6	0.6	0.6
Tesco Express (Esso), Chepstow Rd	2.6	1.0	3.6	4.5
Other, Zone 3	0.0	2.1	2.1	3.9
SUB-TOTAL ZONE 3	2.6	8.4	10.9	15.7

NOTES:

1. Derived by the total expenditure in 2026 (Table 1) according to the market shares outlined in Table 2.
2. Figures may not cast due to rounding.
3. Monetary values are expressed in 2023 prices.

TABLE 4**CONVENIENCE GOODS TURNOVER AT 2029 WITHOUT DEVELOPMENT**

Market Share (£m)	Zone 3			Total
Retail Destination	Main	Top Up	Total	Main & Top Up
Zone 3				
Spar, Caerleon Road	0.0	1.3	1.3	1.6
Spar, Chepstow Road (Street shop)	0.0	0.0	0.0	0.0
Supermarket ABC, Chepstow Road	0.0	0.2	0.2	0.2
Iceland, Clarence Place	0.0	0.2	0.2	1.2
Tesco Express, Caerleon Road	0.0	2.3	2.3	3.3
One Stop, Chepstow Road	0.0	0.3	0.3	0.3
Costcutter, Ringland Shopping Centre	0.0	0.2	0.2	0.2
One Stop, Caerleon Road	0.0	0.6	0.6	0.6
Tesco Express (Esso), Chepstow Rd	2.6	1.0	3.6	4.5
Other, Zone 3	0.0	2.1	2.1	3.9
SUB-TOTAL ZONE 3	2.6	8.4	10.9	15.8

NOTES:

1. Derived by the total expenditure in 2029 (Table 1) according to the market shares outlined in Table 2.
2. Figures may not cast due to rounding.
3. Monetary values are expressed in 2023 prices.

TABLE 5**CONVENIENCE GOODS BENCHMARK 2026 and 2029**

	Gross Floorspace (sqm)	Net Sales Area (sqm)	Net Convenience Sales Area (sqm)	2026				2029			
Retail Destination				Sales Density (£ per sqm)	Benchmark Turnover (£m)	Survey Turnover (£m)	Trading Against Benchmark (£)	Sales Density (£ per sqm)	Benchmark Turnover (£m)	Survey Turnover (£m)	Trading Against Benchmark (£)
Zone 3											
Spar, Caerleon Road	-	261	248	7,462	1.9	1.6	-0.3	7,484.0	1.9	1.6	-0.3
Spar, Chepstow Road (Street shop)	-	166	157	7,462	1.2	0.0	-1.2	7,645.0	1.2	0.0	-1.2
Supermarket ABC, Chepstow Road	-	-	-	-	0.2	0.2	0.0	-	0.2	0.2	0.0
Iceland, Clarence Place	658	329	312	6,354	2.0	1.2	-0.8	6,663.0	2.1	1.2	-0.9
Tesco Express, Caerleon Road	522	231	219	12,431	2.7	3.3	0.5	13,036.0	2.9	3.3	0.4
One Stop, Chepstow Road	-	240	228	7,730	1.8	0.3	-1.5	8,107.0	1.8	0.3	-1.6
Costcutter, Ringland Shopping Centre	-	519	493	4,383	2.2	0.2	-1.9	4,596.0	2.3	0.2	-2.0
One Stop, Caerleon Road	-	248	236	13,401	3.2	0.6	-2.6	16,836.7	4.0	0.6	-3.4
Tesco Express (Esso), Chepstow Rd	-	285	270	12,431	3.4	4.5	1.1	13,036.0	3.5	4.5	1.0
Other, Zone 3	-	-	-	-	3.1	3.9	0.8	-	3.1	3.9	0.8
SUB-TOTAL ZONE 3	1,180	2,278	2,164	-	20.9	15.7	-5.2	-	22.9	15.8	-7.1

NOTES:

1. Derived by the total expenditure in 2029 (Table 1) according to the market shares outlined in Table 2.
2. Figures may not cast due to rounding.
3. Benchmark turnover was calculated by multiplying net sales area by sales density.
4. Sales density was derived from the NRLS Table 4 having regard to sales density growth rates as outlined in the RPN 22 Figure 3a.
5. The performance of retail destinations against benchmark was calculated as a difference between the benchmark figure and the survey turnover as outlined in Tables 3 and 4.
6. Monetary values are expressed in 2013 prices.

TABLE 6**ESTIMATED TURNOVER OF PROPOSED DEVELOPMENT IN 2029**

	Net Sales Area (sqm)	Average Sales Density (£ per sqm)	Estimated Turnover Diverted from Existing Centres/Stores (£m)
Proposed Development	133	6,018	0.8
Total Proposed Development	133	-	0.8

	Zone 3	Outside Zone 3
Assumed Trade Diversion (%)	80%	20%
Assumed Trade Diversion (£m)	0.6	0.2

Sales density growth according to RPBN 22	growth (%)	density (£/sqm)
2023	-2.4%	
2024	-2.3%	
2025	0.0%	
2026	0.1%	6,000
2027	0.1%	6,006
2028	0.1%	6,012
2029	0.1%	6,018

NOTES:

1. Sale Density derived from own estimates making allowance for increase in efficiency as outlined in the RPBN 22 for the year 2029.
2. Turnover presented for 2029 in 2023 prices.
3. Figures may not cast due to rounding.