

PLANNING STATEMENT

BOSS PARK, NEWPORT

May 26



Summary

Proposal

Proposed Change of Use from Industrial Unit (B1/B2/B8) to Gymnastics Centre (D2) and associated works

Location

Units 1-5 Block A, Boss Park, Stephenson Street, Newport, E: 332489, N: 186179

Date

May 26

Project Reference

26.129

Client

Starburst (UK) Ltd

Product of

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

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Report Revision No.

Revision A

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Starburst (UK) Limited to prepare this Planning Statement to accompany a planning application for the proposed change of use from Industrial Units (B1/B2/B8) to Gymnastics Centre (D2) and associated works at Units 1-5 Block A, Boss Park, Newport.
- 1.2 The Planning Statement acts as a supporting document to the accompanying planning application and should be read in conjunction with all other elements of the application. The following drawings accompany the application:

Drawing name	Drawing reference
Site Location Plan	027042/COU-A1-5
Existing Floor Plan	027042/SKGH3
Proposed Floor Plan	PPF-01

- 1.3 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning Application Form	Asbri Planning
Covering Letter	Asbri Planning
Planning Statement	Asbri Planning
Green Infrastructure Statement	Asbri Planning
Business Overview	Cartwheelers Gymnastics
Flood Consequences Assessment	Hydrogeo
Marketing Letter	Knight Frank

- 1.4 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:
- Section 2: provides a description of the site and its surroundings, including a review of the site's planning history
 - Section 3: summarises the development proposals
 - Section 4: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme
 - Section 5: outlines the relevant planning policy context, at both the national and local level
 - Section 6: addresses the key planning considerations associated with the development proposal
 - Section 7: provides a conclusion regarding the overall acceptability of the application

Site Description

The Site

- 2.1 The site comprises units 1-5 Block A at Boss Park, within the Liswerry ward of Newport. The site area spans approximately 1,600m², with a total floorspace of approximately 770m². The units are of a steel portal frame construction, with insulated side elevations and pitched roofs.

Planning History

- 2.2 A review of Newport City Council's planning register identified the following planning history at the site:

Ref.	Description	Decision
22/0346	SCREENING OPINION FOR PROPOSED B1/B2/B8 DEVELOPMENT TOGETHER WITH ASSOCIATED WORKS	ES Required (EIA Screening) 26 Apr 2022
23/0477	PROPOSED CLASS B1(C)/B2/B8 DEVELOPMENT (PHASE 1) TOGETHER WITH ASSOCIATED DEMOLITION/ELEVATIONAL TREATMENT, PARKING, LANDSCAPING, DRAINAGE, ECOLOGICAL ENHANCEMENT AND PROVISION OF IMPROVED PEDESTRIAN/CYCLIST FACILITIES	Granted with Conditions 10 Apr 2024
24/0424	S73 APPLICATION TO VARY THE WORDING OF CONDITION 21 (CONTROL OF USE CLASS MIX) IN RESPECT OF 23/0477 PROPOSED CLASS B1(C)/B2/B8 DEVELOPMENT (PHASE 1) TOGETHER WITH ASSOCIATED DEMOLITION/ELEVATIONAL TREATMENT, PARKING, LANDSCAPING, DRAINAGE, ECOLOGICAL ENHANCEMENT AND PROVISION OF IMPROVED PEDESTRIAN/CYCLIST FACILITIES	Granted with Conditions 05 Sep 2024

Context Analysis

- 2.3 The site is located within an established industrial area of Newport, to the west of Reevesland Industrial Estate. The site is approximately 2.4km to the south east of the city centre. The wider site is bounded to the north by the Lysaght Village residential scheme, to the east by a railway embankment and railway line, to the south by Stephenson Street, and to the west by the River Usk and business units at Esperanto Way.

Public Right of Way

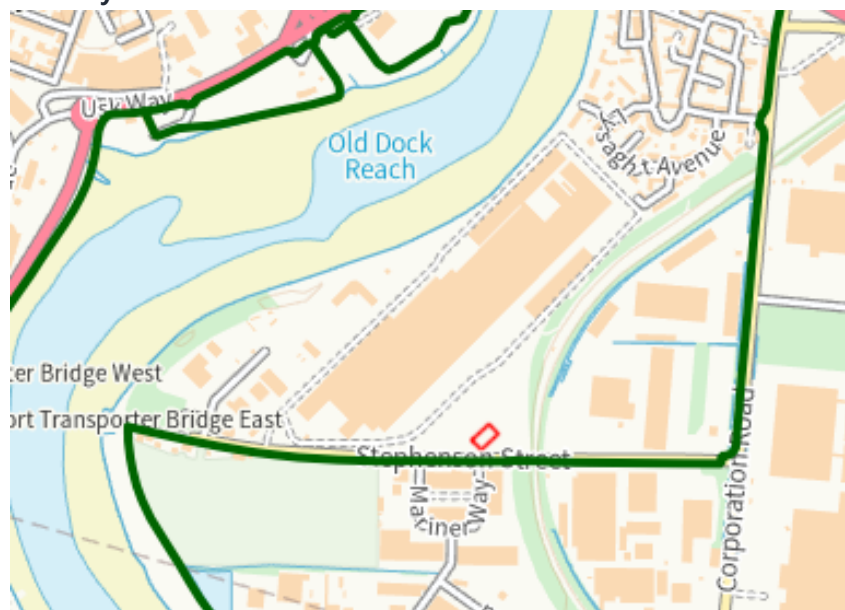


Figure 1: Newport Public Rights of Way Map

- 2.4 A review of Newport's Public Rights of Way (PRoW) Map shows that footpath 386/4/1 (Newport-Liswerry) is found to the south of the site, along Stephenson Street.

Highways

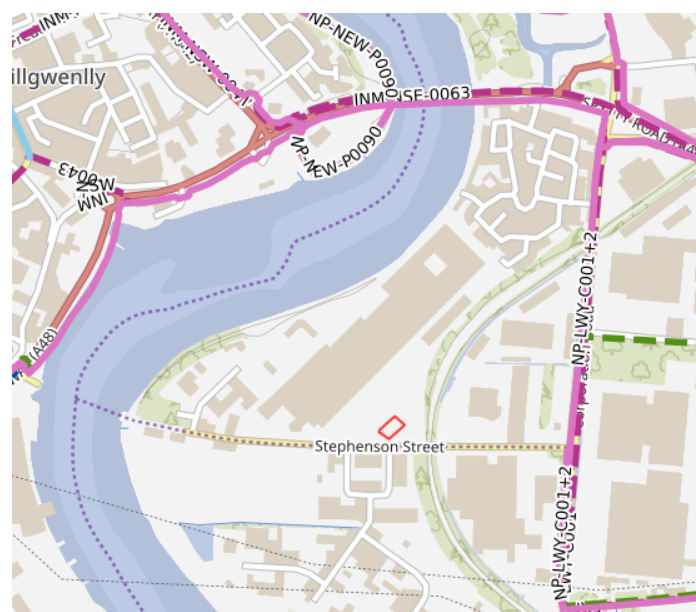


Figure 2: Active Travel Network Map

- 2.5 The site is accessed from the south via a priority junction arrangement with Stephenson Street. To the west of the site, Stephenson Street terminates at the Newport Transporter Bridge, whilst to the east it continues for approximately 750m before meeting Corporation Road. As well as providing access to the site, Stephenson Street also provides access to several nearby industrial businesses. Approximately 750m to the north of its junction with Stephenson Street, Corporation Road connects with the A48 Southern Distributor Road, which connects with the strategic highway network beyond.

- 2.6 Public transport options are available in near proximity to the site, with bus stops found approximately 1.4km to the north at St Stephen's Church (served by routes 40 to Level of Mendalgief and 41 to Newport), and 1.4km to the east at Newport Business Centre (served by routes 42 to Newport and 45 to Nash). The nearest train station is found approximately 3.5km to the north at Newport.
- 2.7 Active travel is facilitated by the aforementioned PROW footpath 386/4/1 and designated active travel routes INM-NSE-0008 (cycle, foot and wheelchair), FRNP-LWY-C001 (future walking and cycling route) and INM-NSE-0028 (future cycling route). In addition, cycle, foot and wheelchair route NP-HUB-C006 is found on the northern bank (adjacent to the Transporter Bridge).

Historic Environment

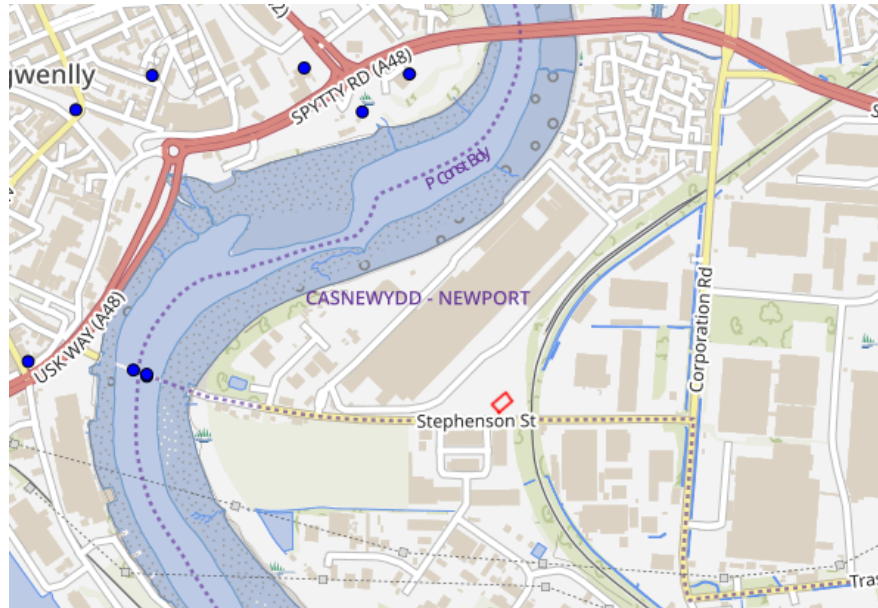


Figure 3: Cadw Historic Records

- 2.8 Cadw's Historic Records Map demonstrates that there are no designated historic assets within the immediate surroundings of the site. Notwithstanding, Newport Transporter Bridge and its associated anchor chambers (grade I listed, Cadw refs. 3076, 17414, 17415) is located to the south west. The Transporter Bridge is designated as it is the finest and largest transporter bridge in Great Britain, and is the only one in the UK designed by Ferdinand Arnodin. In addition, it is one of only a handful of surviving transporter bridges remaining in the world.
- 2.9 A number of grade II listed buildings including Lock walls to mouth of Old Town Dock (Cadw ref. 18179), Malt House (Cadw ref. 18178) and Baltic Oil Works (Cadw ref. 18173) are found to the north of the river bank.

Flood Risk



Figure 4: Flood Map for Planning - Rivers and Sea

- 2.10 Natural Resource Wales (NRW)'s Flood Map for Planning illustrates that the site is located within Flood Zone 3 for the Sea. However, it is also defended by an 813m tidal embankment (asset ref. EMB1501441), as shown by the red dashed line.

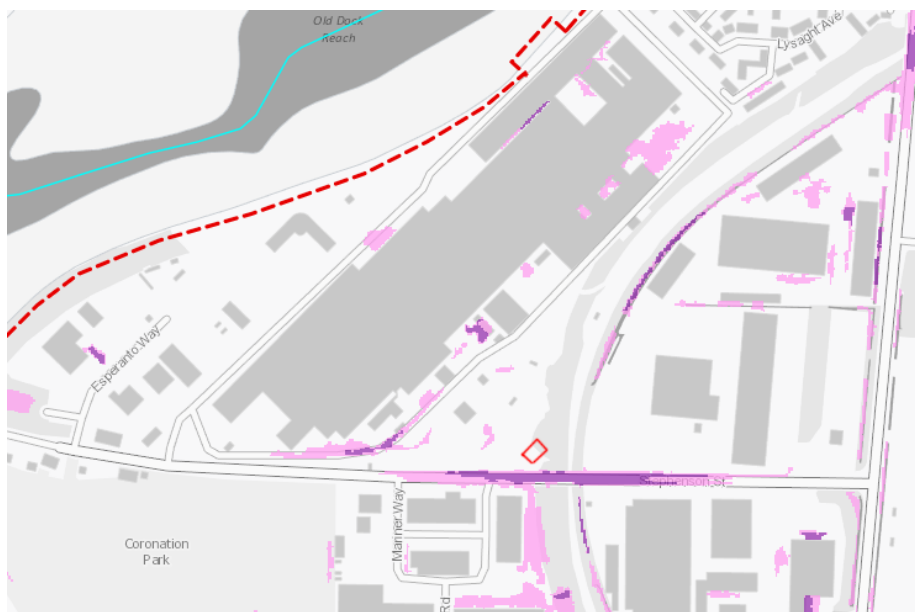


Figure 5: Flood Map for Planning - Surface Water and Small Watercourses

- 2.11 Furthermore, the Surface Water and Small Watercourses Map shows that the site is not subject to flooding from surface water and small watercourses.

Proposals

- 3.1 It is proposed to change the use of the existing B1/B2/B Units to a D2 Gymnastics Centre. The Gymnastics Centre will be run by Cartwheelers Gymnastics Ltd. The aim of the development is to provide a dedicated facility which grows upon their existing facility. It is sought to provide a community-focused gymnastics club based in Newport which is dedicated to providing high-quality gymnastics and physical activity opportunities for children, young people, and families. This development will also establish Cartwheelers as one of the few high-quality gymnastics facilities in south east Wales, strengthening its role as a leading provider of community sport and physical activity.
- 3.2 The proposed operating hours are as follows:
- Monday – Friday: 9.00am – 8.30pm
 - Saturday – Sunday: 9.00am – 4.00pm
- 3.3 These hours will accommodate a mix of preschool, recreational, and after-school classes, as well as weekend sessions and community programmes. As such, these hours reflect the typical nature of such facilities.
- 3.4 The facility shall operate on a structured timetable, with supervised sessions only and no open access. At full capacity, approximately 600-800 weekly participants are anticipated per week, spread across multiple sessions throughout the day. Each class will typically involve 24-28 participants under the supervision of qualified coaching staff.
- 3.5 The proposed development relates only to the change of use of the existing units, with no external alterations or construction works.
- 3.6 The site shall be accessed from the south via the existing priority junction arrangement with Stephenson Street and subsequent route through Boss Park. As demonstrated on the accompanying parking layout (027042/SKGH3), units 1-5 include a total of 33 car parking spaces, including 1 disabled bay and 1 operational commercial vehicle space. In addition, 2 parking spaces and a cycle store comprising 6 cycle parking spaces.
- 3.7 The proposal shall not result in any significant negative impacts on existing green infrastructure, given that the proposal simply relates to the change of use of the existing building. As such, the proposals adhere to Step 1 of the Step-Wise Approach as it avoids the unnecessary removal of existing trees, hedgerows and vegetation on site, demonstrating that the baseline position in terms of green infrastructure provision will remain unaltered. In accordance with the Step-wise Approach, biodiversity enhancements (comprising the installation of bird and bat boxes) are proposed to provide net benefits for biodiversity.

Planning Policy Context

Introduction

- 4.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*.
- 4.2 The Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.
- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.4 The Development Plan comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February 2021)
 - Newport Local Development Plan 2011-26 (January 2015)
- 4.5 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 12 (February 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes
 - Relevant Supplementary Planning Guidance

National Development Framework: Future Wales – The National Plan 2040

- 4.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 4.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1 ...and work in connected, inclusive and healthy places
- 2 ...in vibrant rural places with access to homes, jobs and services
- 3 ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4 ...in places with a thriving Welsh Language
- 5 ...and work in towns and cities which are a focus and springboard for sustainable growth
- 6 ...in places where prosperity, innovation and culture are promoted

- 7 ...in places where travel is sustainable
- 8 ...in places with world-class digital infrastructure
- 9 ...in places that sustainably manage their natural resources and reduce pollution
- 10 ...in places with biodiverse, resilient and connected ecosystems
- 11 ...in places which are decarbonised and climate-resilient

Growth Strategy

- 4.8 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- **Cardiff, Newport and the Valleys**
- Swansea Bay and Llanelli
- Wrexham and Deeside

- 4.9 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being" (page 60).*

Strategic Placemaking

- 4.10 Policy 2 of Future Wales is of key relevance in terms of strategic placemaking, which states the following:

"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

National Growth Area

- 4.11 Policy 33 – National Growth Area - Cardiff, Newport and the Valleys is particularly pertinent to the proposed development. It details that:

"Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure... The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long -term growth and investment. The Welsh Government will work with authorities within

the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport."

Local Level

- 4.12 Newport Local Development Plan 2011-26 (LDP) was adopted in January 2015 and comprises part of the prevailing development plan for the area.

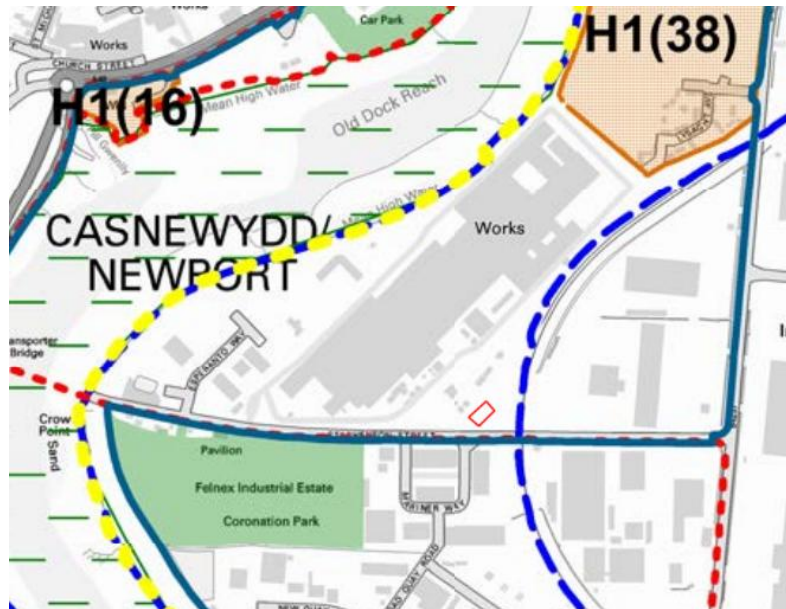


Figure 6: LDP Proposals Map

- 4.13 As illustrated by the above LDP Proposals Map, the site is located within an Archaeologically Sensitive Area (policy CE6) and is within the Developed Coastal Zone (policy CE9). It is also situated within the Urban Boundary.
- 4.14 The following LDP policies are considered relevant in the context of the proposed development:

Policy	In relation to
Strategic	
SP1	Sustainability
SP3	Flood Risk
SP18	Urban Regeneration
General	
GP2	General Amenity
GP4	Highways and Accessibility
Environment	
CE2	Waterfront Development

CE6	Archaeology
CE9	Coastal Zone
Employment	
EM3	Alternative uses of Employment Land

4.15 In regard to Sustainability, policy SP1 states that *“proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to:*

- i. *the efficient use of land;*
- ii. *the reuse of previously developed land and empty properties in preference to greenfield sites;*
- iii. *providing integrated transportation systems, as well as encouraging the co-location of housing and other uses, including employment, which together will minimise the overall need to travel, reduce car usage and encourage a modal shift to more sustainable modes of transport;*
- iv. *reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources;*
- v. *the minimisation, re-use and recycling of waste;*
- vi. *minimising the risk of and from flood risk, sea level rise and the impact of climate change;*
- vii. *improving facilities, services and overall social and environmental equality of existing and future communities;*
- viii. *encouraging economic diversification and in particular improving the vitality and viability of the city centre and district centres;*
- ix. *conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;*
- x. *conserving and ensuring the efficient use of resources such as water and minerals.”*

4.16 Policy SP3 relates to flood risk, stating that: *“Newport’s coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere. Development will only be permitted in flood risk areas in accordance with national guidance. Where appropriate a detailed technical assessment will be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime. Sustainable solutions to manage flood risk should be prioritised.”*

4.17 Policy SP18 (Urban Regeneration) states that *“proposals will be favoured which assist the regeneration of the urban area, particularly where they contribute to*

- i. *the vitality, viability and quality of the environment of the city centre,*
- ii. *the provision of residential and business opportunities within the urban area,*
- iii. *reuse of vacant, underused or derelict land and*
- iv. *encourage the development of community uses where appropriate.”*

4.18 Regarding General Amenity, policy GP2 states that *“development will be permitted where, as applicable:*

- i. *there will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;*
- ii. *the proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;*
- iii. *the proposal seeks to design out the opportunity for crime and anti-social behaviour;*

- iv. *the proposal promotes inclusive design both for the built development and access within and around the development;*
 - v. *adequate amenity for future occupiers."*
- 4.19 Policy EM3 is of central relevance, as the proposal involves the loss of an existing office (employment use). It states that *"development proposals promoting alternative uses on existing employment sites will be resisted unless:*
- i. *the site has been marketed unsuccessfully for employment purposes for a minimum of 12 months;*
 - ii. *there remains a sufficient range and choice of employment land and premises to meet LDP requirements and local demand;*
 - iii. *the development has no adverse impact on existing or allocated employment sites;*
 - iv. *the development has no adverse impact on amenity or the environment."*

National Policy and Guidance

Planning Policy Wales Edition 12

- 4.20 Planning Policy Wales (PPW) Edition 12 was published in February 2024. 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 well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 4.21 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.
- 4.22 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.

Green Infrastructure

- 4.23 The importance of green infrastructure is highlighted throughout PPW.
- 4.24 The Step-Wise Approach confirms that the first priority for planning authorities is to avoid damage, if that is not possible then there is a requirement to minimise, mitigate, compensate on site, and then only as a last resort off-site compensation for unavoidable damage must be provided.
- 4.25 Paragraph 6.2.12 confirms that *"A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied"*.

Sport and Leisure

- 4.26 Section 4.0.2 of PPW 12 *"acknowledges the significance of community facilities and recreational spaces for our health, well-being and quality of life"*.
- 4.27 The importance of this is reiterated in section 4.5, which states that recreational spaces are *"vital for our health, well-being"*. This section further details that *"These activities [physical activities] are important for the well-being of children and adults and for the social, environmental, cultural and economic life of Wales."*

Technical Advice Notes

- 4.28 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 4.29 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 4.30 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 4.31 TAN 15 Development and Flood Risk (2025): provides technical guidance which supplements the policies set out in PPW and Future Wales in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the consequences of the risks and adapting to and living with flood risk.
- 4.32 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

Local Planning Authority Supplementary Planning Guidance

- 4.33 The following Supplementary Planning Guidance (SPG) adopted by Newport City Council is of relevance to the proposed development:
- Sustainable Travel (July 2020)
 - Parking Standards (August 2015)

Newport Local Development Plan 2011-2026 Annual Monitoring Report (October 2024)

- 4.34 As part of the statutory development plan process, the Council is required to prepare an Annual Monitoring Report (AMR). The AMR monitors the effectiveness of the policies within the LDP and is the main mechanism for reviewing the relevance and performance of the LDP. It also identifies whether any changes are necessary. The current AMR is the ninth AMR to be prepared since the adoption of the LDP; it focuses on the period 1 April 2023 to 31 March 2024 and builds on evidence obtained by the previous eight AMRs.
- 4.35 Objective 3 relates to Economic Growth. This objective aims to enable a diverse economy that meets the needs of the people of Newport and those of wider South East Wales economic region.
- 4.36 Table 13: OB3 MT1 (additional net employment land) has identified that Newport has granted a net increase of approximately 2.96ha of employment land this year. In the last AMR, a total of 24.87ha of EM1 employment land had been developed from the start of the Plan period to 2023 (35.34ha with the inclusion of EM2 Newport Docks). On average, this equated to 2.073ha a year (2011- 2023) which is above the 1.4ha predicted by the Employment Land Review and LDP (or with the inclusion of Newport Docks, the average

was 2.945ha a year). As such, since the start of the Plan period, over 50ha of new employment land has been created. Out of this 50ha, 31.43ha comprises EM1 allocations and has been delivered.

- 4.37 In terms of EM1 allocations, this equates to 2.42ha a year (2011- 2024), which exceeds the 1.4ha predicted by the Employment Land Review and LDP. Two new planning permissions have been granted for development on land within the EM1 allocations over the last year, both for Units 11 and 12 at EM1 (vii) Celtic Business Park (now known as St. Modwen Park). With the positive delivery of EM1 land compared to the predicted annual rate in the Employment Land Review and LDP, and the good progress made with employment land delivery overall, the indicator remains green.
- 4.38 Table 14: OB3 MT2 (employment land supply) states that there remains just over 116ha of EM1 employment land which has not been developed or been granted planning permission for development. As such, the available employment land supply is just under 11 years. This is a healthy level of supply.
- 4.39 However, table 16:OB3 MT4 (Existing B class employment land lost to other causes) states that eight planning applications have been approved which involve the loss of employment land. There have been eight planning applications which have been approved which have led to a loss of employment land totalling approximately 0.765ha. No EM1 land has been lost to non-employment uses at time of the AMR (October 2024). Policy EM3 was appropriately considered for the majority of these applications, with Officers reaching a reasoned and balanced conclusion. However, three applications did not reference EM3 as part of their assessment.
- 4.40 It is therefore demonstrated that employment land is increasing overall, and that the proposed development would accord with the AMR.

Appraisal

Overview

- 5.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 5.2 The key material planning considerations are as follows:
- The principle of development
 - The impact of flood risk
 - The impact on highways and parking
 - The impact on amenity
 - Other material considerations

Principle of Development

- 5.3 The site is located within a sustainable location within the settlement boundary. As such, it is located in an area whereby development is generally viewed favourably. In addition, Newport is identified as a key national growth area, in which sustainable growth and investment is encouraged by Future Wales.

Policy EM3

- 5.4 Policy EM3 is of particular pertinence to the proposed development, given that it relates to alternative uses of employment land.
- 5.5 In respect of criterion i), the accompanying Marketing Report produced by Knight Frank identifies that the site has been actively marketed since November 2025. Whilst this falls below the 12-month threshold itself, it should be acknowledged that the site has also been marketed prior to this date by the landowner. As such, it is considered that the site has been sufficiently unsuccessfully marketed in accordance with criterion i) of policy EM3.
- 5.6 Regarding criterion ii), there remains to be a sufficient range and choice of employment land and premises to meet LDP requirements and local demand. This is evident as there are currently a number of industrial units being actively marketed across nearby estates including Stephenson Street, Felnex, Newport Business Centre, and Langland West. In addition, there has been a lack of interest in the property for employment use over the marketing period.
- 5.7 In addition, Knight Frank confirm in the accompanying Marketing Report that “there is a notable and sustained level of interest from occupiers seeking space for alternative uses, particularly gym, padel and leisure operators (D2)... This shift reflects changing occupier profiles and the suitability of industrial-style buildings for a wider variety of operational formats.” This trend is also noted by Asbri Planning, who have also experienced an increase in demand for planning applications and/or planning advice in relation to similar changes of use from B1/B2/B8 to D2 use.
- 5.8 It is also evident from Knight Frank’s Report that transactions have slowed over the last 18 months in relation to business units of this size, due to market/circumstantial conditions and the fact that many national and conventional commercial occupiers are already established locally.
- 5.9 Furthermore, the latest AMR demonstrates that employment land is generally increasing, with a current healthy employment land supply of just under 11 years (as of October 2024). As such, the proposed development is not considered to have any detrimental impact on objective 3 – Economic Growth.

- 5.10 Indeed, the applicant has also instructed Asbri Planning to prepare a planning application to develop phase 2 at Boss Park. At time of writing, it is sought to deliver 4no. additional units with a total floorspace of 11,947m² for B1/B2/B8 use through the phase 2 application (subject to change as the design progresses). As such, the applicant is preparing to deliver a significant level of additional employment use, which will offset the loss of employment use as a result of this proposed development and result in a significant net increase in employment floorspace.
- 5.11 In accordance with criterion iii), it is considered that the proposed development will have no significant adverse impact on existing or allocated employment sites. The principle of a gymnastics facility located within an industrial site is firmly established, for example, City of Newport Gymnastics Academy is located at Langland Way, Reevesland Park Industrial Estate just 2km (approximate distance) to the north east.
- 5.12 Finally, the proposed development has been assessed in relation to amenity and the environment in the below dedicated sections.
- 5.13 In light of the above, it is considered that the proposed development accords with policy EM3.

Policy SP1

- 5.14 Policy SP1 is of key importance to the proposed development, as it relates to sustainability and sustainable development.
- 5.15 The proposed development is considered to make efficient use of land, as it would result in the use of a currently vacant property, in accordance with criteria i) and ii) of policy SP1. In addition, it is situated on previously developed (brownfield) land.
- 5.16 Regarding criterion iii), the site is considered to be situated within a relatively sustainable area, given the proximity of residential properties to the north at Lysaght Village and Liswerry, in addition to residential areas of Pillgwenlly. Public transport opportunities in the form of bus stops are located within walking distance from the site. In addition, PRoW footpath and designated active travel routes are located in close proximity. Notwithstanding this, it is considered that the nature of the proposed use would result in many visitors choosing to travel via private car, however, this would also be the case if the units were to operate under their extant use.
- 5.17 In respect of criterion vii) of policy SP1, the proposed development would create a high-quality gymnastics facility for the local community, proving opportunities for exercise, socialising and recreation. This also accords with the goals and targets of PPW 12, as well as the Wellbeing of Future Generations (Wales) Act 2015.
- 5.18 The development would also result in modest employment opportunities for local people, and will contribute to economic diversification within this predominantly industrial area, in accordance with criteria viii) of policy SP1.
- 5.19 In view of the above, it is considered that the proposed development would be sustainable, as it would make use of a redundant building on brownfield land, which is located within a relatively sustainable area inside of the settlement boundary. It is therefore considered to accord with policy SP1.

Policy SP18

- 5.20 Policy SP18 relates to urban regeneration. In this regard, the proposed development is considered to accord with criteria ii) as it shall transform the vacant building into a high-quality gymnastics facility, which will allow children and adults alike to partake in physical activity. The proposed use shall ensure that the building

is well-maintained and utilised in a positive manner. In addition, paragraph 2.76 states that “opportunities should be taken to provide a mix of uses”. As such, it is considered that the proposed change of use would positively contribute towards increasing the vitality and quality of the local environment by providing the opportunity for active community use, on currently underused land.

- 5.21 In light of the above, it is considered that the principle of development is established in accordance with local and national planning policy.

Flood Risk

- 5.22 The site is located within Flood Zone 3 for river and sea flooding. Notwithstanding, it is protected by an 813m tidal embankment (ref. EMB1501441). As such, a Flood Consequences Assessment (FCA) has been produced to accompany this planning application. This builds upon the FCA submitted with the original application for the units (23/0477). The original FCA identified that the finished floor level of the buildings is to be set as a minimum at 8.10m AOD. It concluded the proposed development will have no impact on flood risk and the overall direction of the movement of water will be maintained. The original FCA further concluded that there will be a gain in flood storage capacity and the conveyance routes will not be blocked or obstructed. As such, Officers were satisfied at this stage that there was no increase in flood risk elsewhere or conveyance changes off-site post development and would require no further information under TAN 15 criteria (as adopted at time of the original application).
- 5.23 Paragraph 9.3 of TAN 15 defines less vulnerable development as development where “the ability of occupants to decide if risks and consequences are acceptable is greater than that in the highly vulnerable category.” By contrast, paragraph 9.2 of TAN 15 defines highly vulnerable development as development where “the ability of occupants to decide whether they wish to accept the risks to life and property associated with flooding, or to manage the consequences of such a risk, is limited.” As such, the proposed gymnastics centre would comprise less vulnerable development, given that the proposed use is characterised by short-duration visits by members of the public. Attendance is discretionary and not compulsory in nature. Occupants are therefore able to make informed decisions regarding attendance in the context of flood warnings or severe weather alerts. There are no mobility-dependent residents, sleeping occupants, or individuals requiring assisted evacuation beyond normal public safety procedures applicable to commercial leisure uses. As such, the proposed development is considered to comprise ‘less vulnerable’ development in accordance with paragraphs 9.2 and 9.3 of TAN 15. Accordingly, TAN 15 states that less vulnerable uses are appropriate at this location.
- 5.24 The FCA identifies that the site is unlikely to flood, except during rare and extreme conditions, and has not historically flooded. However, it does note that there is a risk of medium significance in terms of tidal flooding, but it also states that this risk can be mitigated using a number of risk management measures to manage and reduce the overall flood risk at the site. These measures are based on a forecast-led managed evacuation approach, which is consistent with the less vulnerable classification of the development under paragraphs 9.2 and 9.3 of TAN 15. These measures comprise implementing a Flood Warning & Evacuation Plan, providing safe access and egress routes and identifying residual risks. In addition, it is noted that the site is situated within an allocated Developed Coastal Zone (policy CE9). It is therefore considered to accord with criterion ii) of policy CE9, given that the area is defended by the 813m tidal embankment.
- 5.25 The FCA also states that the risk of flooding in regard to groundwater, surface water (pluvial), sewers and artificial drainage systems/infrastructure failure is considered to be not significant.
- 5.26 The proposal comprises the change of use of an existing building with no extension, ground raising or structural alteration to the finished floor level. The overall direction of the movement of water will be maintained within the developed site and surrounding area. The conveyance routes (flow paths) will not be blocked or obstructed. There will be no increase in the floodwater levels due to the proposed development.

There will be no loss in flood storage capacity and no change in the on-site and off-site flood risk. Therefore, the site is compliant with TAN 15 and will not increase flood risk elsewhere.

- 5.27 In light of the above, it is considered that the proposed development is acceptable in relation to policies CE9 and SP3, and TAN 15.

Highways and Parking

- 5.28 The site is situated within parking zone 6. The proposed use fits into land use category D2 (as stated within the Parking SPG). The Parking SPG states that there should be 1 commercial vehicle space (operational) and 1 space per 2 facility users (non-operational). As demonstrated on the accompanying parking layout (027042/SKGH3), units 1-5 include a total of 33 car parking spaces, including 1 disabled bay and 1 operational commercial vehicle space. In addition, 2 parking spaces and a cycle store comprising 6 cycle parking spaces.
- 5.29 As such, for a class with 24 participants, a total of 13 spaces are required. For a class of 28, a total of 15 spaces are required. Both of these figures include 1 operational commercial vehicle space. However, they do not allow provisions for staff parking. Whilst these the figures calculated under the Parking SPG are lower than the existing parking spaces on site, realistically many of the participants will be young children, who will likely need to travel by private car. This is typical of the nature of gymnastics facilities.
- 5.30 Notwithstanding the above, the proposed development is likely to offer a betterment in terms of highways use and traffic generation in comparison to the existing B1/B2/B8 use, with less traffic flows during typical peak traffic hours in the morning and evening. The flow of traffic will instead be spread throughout the day to reflect the gymnastics class hours.
- 5.31 The site is considered to be situated within a relatively sustainable area, given the proximity of residential properties to the north at Lysaght Village and Liswerry, in addition to residential areas of Pillgwenlly. The site is accessible via public transport, with bus stops located within walking distance. In addition, active travel to the site is supported by the aforementioned PRoW footpath and designated active travel routes. It is therefore considered that the site is situated within a relatively sustainable location, with public transport and active travel opportunities in place, in accordance with policies GP4 and SP2. However, as aforementioned, it is considered that the nature of the proposed use and the age of many of the participants may require a high degree of travel via private car.
- 5.32 It is therefore considered that the level of parking provision is appropriate, given the nature of the proposed development and its users. The site is situated within an area whereby active travel and public transport options are available, if appropriate. The proposed use will not result in any detrimental impact on highways safety, capacity or traffic flows. As such, it is considered that the proposed development accords with local policies GP4, SP2 and TAN 18 guidance.

Amenity

- 5.33 In terms of amenity, the existing surroundings comprise predominantly industrial uses with the only residential development located to the north, with the intervening existing industrial site and adjacent railway line. As such, the site may be subject to existing occupational noise and potential noise disturbances.
- 5.34 However, it should be noted that the nature of the proposed use would not be particularly sensitive to any noise disturbances. Furthermore, it is noted that any use of the venue is completely optional and temporary, so users would not be subject to prolonged disturbances. As a result, the proposed use is considered to be less vulnerable in terms of amenity compared to the extant B1 use, with no significant adverse impacts in line with criterion i) of policy GP2. In addition, it is not considered that the proposed use would result in any

significant adverse impacts on any third party or neighbouring occupier, given the location of the site at the southern-most point of the wider industrial site at Boss Park, and that a degree of operational noise and activity is already characteristic of the area.

- 5.35 Furthermore, no significant impacts are anticipated as a result of the proposed development in relation to privacy, overbearing, light, odours or air quality.
- 5.36 In respect of criterion ii), the proposed development would not have any detrimental impact on visual amenity for nearby occupiers, as it relates simply to the change of use of the existing building. There will be no material changes in terms of the design. It is acknowledged however that the proposed use deviates from the existing industrial character of the area. Notwithstanding, there is evidence of local similar uses within industrial contexts, such as the City of Newport Gymnastics Academy, which is located at Langland Way, Reevesland Park Industrial Estate.
- 5.37 Criteria iii), iv) and v) are not relevant to the proposed development, as the proposals relate to the change of use of the existing building, rather than the design of any new building.
- 5.38 In light of the above, it is considered that the proposed development would have no significant impact on amenity for both existing third parties and users of the site in line with policy GP2.

Other Material Considerations

- 5.39 Whilst it is acknowledged that the site is located within an allocated Archaeologically Sensitive Area (policy CE6), the proposed development will not have any significant impact on archaeology, as it simply relates to the change of use of the existing building. As such, there shall be no groundworks or any installation of services which may disrupt any archaeological remains. It is also worth noting that, in the original application (23/0477), Glamorgan Gwent Archaeological Trust stated that it was unlikely that archaeologically significant material would be encountered and that there was unlikely to be an archaeological restraint. As such, it is not considered that an Archaeological Impact Assessment would be required, and that the proposed development accords with policy CE6.
- 5.40 The proposed development does not require construction works, given that it relates solely to the change of use of the existing building. Consequently, the proposed development would not result in any drainage implications; it would not result in an increase in surface water runoff rate, volume or change in routing when compared with the existing situation. As such, it is considered that SAB approval would not be necessary in this instance, on the basis of Schedule 3 of the Flood and Water Management Act 2010.
- 5.41 A Green Infrastructure Statement has been prepared in support of this planning application to demonstrate that the step-wise approach has been applied, in accordance with paragraph 6.2.12 of PPW. Given the nature of the proposed development, there will be no impact on green infrastructure. As such, modest biodiversity enhancements in the form of the implementation of bird and bat boxes are proposed to provide net benefit for biodiversity.

Conclusion

- 6.1 This Planning Statement has been prepared on behalf of Starburst (UK) Ltd in relation to the proposed full planning application for the proposed Change of Use from Industrial Unit (B1/B2/B8) to Gymnastics Centre (D2) and associated works.
- 6.2 The proposed development seeks to create a high-quality gymnastics facility for the local community, providing opportunities for exercise and recreation. It shall provide health and wellbeing benefits for children and adults alike, in addition to employment opportunities and economic diversification.
- 6.3 It is considered that the principle of development is established in accordance with local and national policy, given that the site is located within the settlement boundary of Newport (national growth area). Furthermore, the proposed change of use has been assessed key LDP policy EM3. The accompanying Marketing Report confirms that the site has been actively marketed for employment use on a long-term basis (without interest for employment use), and that there remains to be a sufficient range and choice of employment land and premises to meet the LDP requirements and local demand. This is reinforced by there being a healthy employment land supply of just under 11 years (as identified by the most recent AMR). The applicant has also instructed Asbri Planning to prepare a planning application to develop phase 2 at Boss Park, which (at time of writing), proposes to deliver 4no, additional employment units with a total floorspace of 11,947m². As such, it is anticipated that the loss of employment units as a result of this application shall be offset appropriately.
- 6.4 Flood risk has been carefully assessed by the accompanying FCA. It is considered that the proposed use would be defined as a 'less vulnerable' use (as defined by TAN 15), and so, would be appropriate at this location. It notes that the site would be expected to remain dry in all but the most rare and extreme conditions, and provides a number of safety and risk management measures which will be implemented on site to mitigate risks. As the proposals simply relate to the change of use of the existing building, flood risk will not be increased at the site or elsewhere. As such, the proposals are considered to be acceptable in relation to flooding, in accordance with policies CE9 and SP3, and TAN 15.
- 6.5 The proposed development will utilise the existing parking and access road, and is considered to have a negligible impact in terms of traffic generation when compared to the extant use. Whilst the number of existing parking spaces exceeds the figure calculated by the Parking SPG, it is considered to be appropriate given the nature of the proposed use, as aforementioned.
- 6.6 In terms of amenity, the proposed use is considered to not be particularly vulnerable to existing operational noise. It is anticipated to not generate a significant level of noise itself, particularly given its location at the southern-most point of the wider Boss Park area. There are no design implications, given that the proposed development relates solely to the change of use.
- 6.7 There shall be no significant impact on any existing green infrastructure, given that the proposal simply relates to the change of use of the existing office building. In accordance with the Step-wise Approach, biodiversity enhancements (in the form of the installation of bird and bat boxes) are proposed, in order to provide net benefits for biodiversity.
- 6.8 Therefore, it is considered that the proposals comply with the relevant national and development plan planning policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Newport City Council grant planning permission for the proposed development.