

The British Land Company PLC

Planning and Retail Statement

Unit 1, Harlech Retail Park, Cardiff Road,
Newport

by CarneySweeney

Date: February 2026



CARNEYSWEENEY
PLANNING

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APPENDICES

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1.0 INTRODUCTION

1.1 Background

- 1.1.1 This Retail Impact Assessment has been prepared by CarneySweeney on behalf of The British Land Company PLC (“the applicant”), in support of a s73 application for unit 1 (formerly Homebase) at Harlech Retail Park, Cardiff Road, Newport.
- 1.1.2 The s73 application seeks consent for the variation of Condition 8 of planning permission 93/0261/0 (granted on the 4th of November 1994) to allow open A1 retail sales from unit 1 including up to 30% of the sales floorspace (i.e. 704sqm) for food and drink sales. The unit is intended to be re-occupied by Home Bargains which desires an additional store to serve Newport.
- 1.1.3 The site lies ‘out of centre’ in town centre use terms. Accordingly, this report considers the application of the need, sequential and impact planning policy tests when assessing the proposed relaxation of the unit’s existing operational restriction. This report has been prepared in accordance with the requirements set out in Planning Policy Wales and is intended to assist Newport City Council (‘the Council’ or ‘NCC’) in its determination of the application.

1.2 Structure

- 1.2.1 The remainder of this statement is structured as follows:
- Section 2: describes the site, the relevant planning history and the proposed development.
 - Section 3: sets out the local and national planning policy context.
 - Section 4: considers the health of existing nearby designated centres.
 - Section 5: considers matters relating to retail need.
 - Section 6: considers the application of the sequential approach and outlines the findings of a sequential site search.
 - Section 7: addresses the retail impact of the proposed development; and
 - Section 8: provides conclusions.



2.0 THE PROPOSED DEVELOPMENT

2.1 The Application Site

- 2.1.1 Harlech Retail Park is a well-established retail park located in Newport approximately 1.8km southwest of the city centre. Please see Figure 1 below.

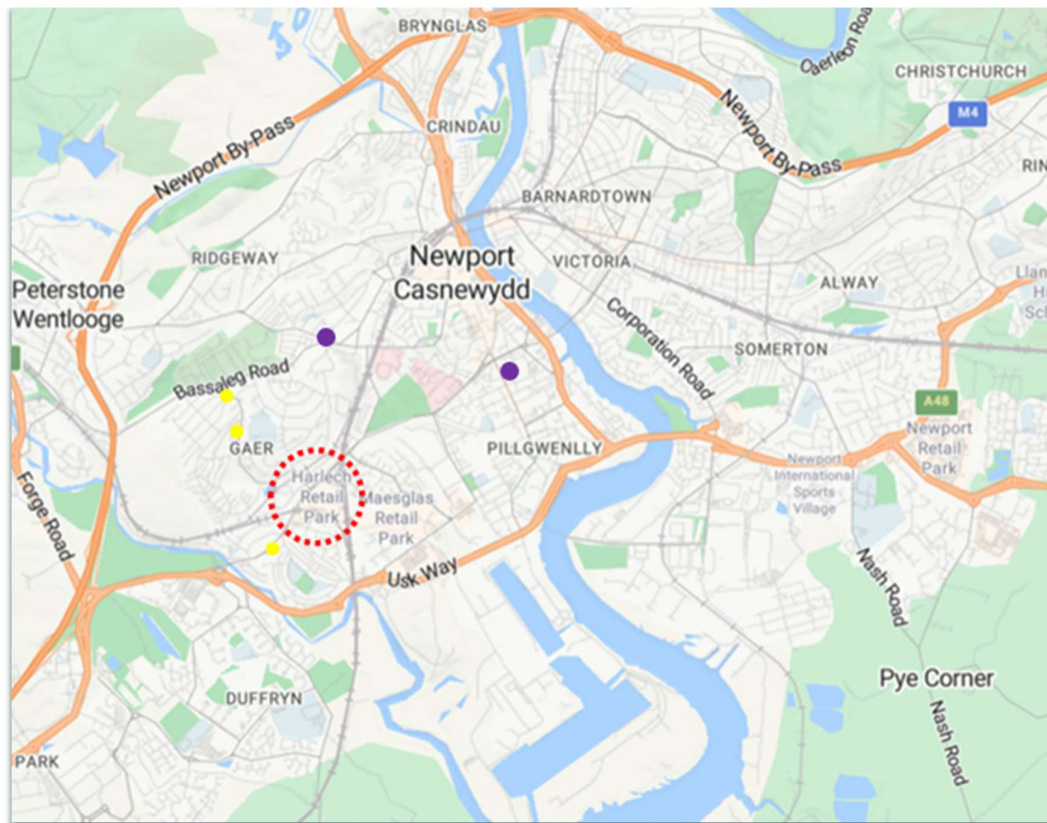


Figure 1: Site Location

- 2.1.2 The retail park is accessed from the B4237 Cardiff Road and is surrounded on all sides by road and rail networks. The nearest local centres (depicted by yellow dots in Figure 1 above) are Bassaleg Road, Gaer Road and Cardiff Road local centres. The closest district centres (depicted by purple dots in Figure 1 above) are Commercial Road and Handpost district centre.
- 2.1.3 The Retail Park comprises 5 retail units anchored by a Tesco Extra store with a shared, dedicated surface car park (see Figure 2 overleaf). In addition to the vacant application site (unit 1), the other units are occupied by Hobbycraft (unit 2), City Carpets (unit 3a) and Curry's PC World (unit 3b). In the northern corner of the site lies a Tesco petrol filling station and a McDonalds Drive-Thru restaurant. This application relates to unit 1 only which provides 2,608 sqm (28,075sq ft) of floorspace (GIA).



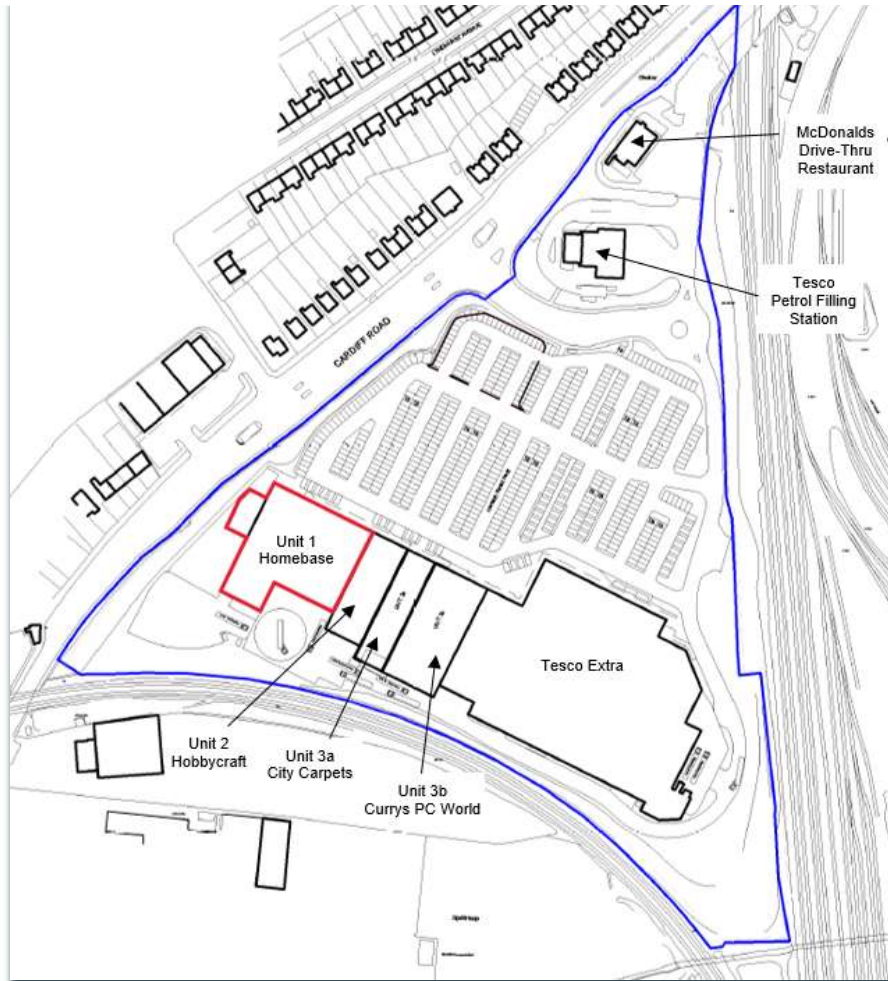


Figure 2: Harlech Retail Park Site Layout (with Unit 1 outlined in red)

2.2 Planning History

- 2.2.1 The retail park was developed pursuant to outline planning permission in 1993 (Ref: 93/0261/0) which allows open A1 sales from all units, save for unit 1 (formerly Homebase) which is subject to a bulky goods restriction. Unit 1 is the only unit restricted by condition 8 which reads as follows. No other elements of planning history are specifically relevant to the proposal:

“The use of the DIY Retail warehouse hereby approved, shall be restricted to the sale of DIY goods including building materials, kitchen and bedroom fittings, garden materials, and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods and household furnishings, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987.”



2.3 Application Proposal

2.3.1 As explained earlier this application seeks permission to vary condition 8 of planning permission 93/0261/0 to allow open Class A1 retail sales from unit 1 to facilitate reoccupation by Home Bargains. Home Bargains requires an additional store to serve Newport and thus occupation of the application site premises would be an additional outlet, not a relocation. The sale of ancillary food and drink from the unit is intended to be an ancillary element limited to up to 30% of the sales floorspace i.e., 704sqm. To this end, the applicant is agreeable to a suitably worded planning condition restricting the sale of food.

2.3.2 We therefore propose that the wording of Condition 8 is replaced with new wording as follows:

“The retail sale of food and drink from Unit 1 (identified on drawing 32508-PL00 rev C) shall be ancillary in nature and limited to no more than 30% of the total net sales floorspace of the unit.”

2.4 Prospective Occupier

2.4.1 As outlined above, the application proposals are being pursued to enable the vacant Unit 1 to be occupied by national retailer Home Bargains, the trading name of TJ Morris Limited (TJM).

2.4.2 TJM was established 50 years ago by Tom Morris who opened his first store in Liverpool. The business has grown organically to become one of the biggest privately-owned companies in the UK. Home Bargains now have over 600 stores and employs over 24,000 members of staff. The company intends to continue its rapid growth and has ambitious expansion plans. TJM plan to grow to 1,200 stores, employing over 40,000 staff.

2.4.3 Home Bargains currently operate in the Newport area, with the nearest store located within Newport West Retail Park on Docks Way. This store comprised the redevelopment of an existing Home Bargains store, granted permission in October 2023 (ref: 23/0091) and recently opened. Home Bargains are also in occupation at Newport Retail Park on Seven Stiles Avenue. TJM have confirmed that both of these stores, which are popular and trading well, will continue to operate – the proposed occupation at Harlech Retail Park will be a new store in addition to those already serving parts of Newport, as outlined in the submitted TJM Letter of Support. As such, the proposals will improve the retail choice and competition currently represented in the local area.



- 2.4.4 Home Bargains operates within the discount, or value, retail sector. Their strap line is “Top Brands – Bottom Prices”. The discount retail sector has seen significant growth in recent years as shoppers have been attracted by the quality of the products and competitive pricing. The success of discount retailers, and their ability to offer such low prices, is based on a combination of low profit margins and ruthless efficiency. The efficiency of Home Bargains’ operation extends across all aspects of their business including their trading format.
- 2.4.5 The business’ ethos is to ‘sell the best branded products at the lowest possible price’. For Home Bargains to sell a product, it needs to be between 10% and 30% cheaper than elsewhere. Approximately, 70% of the retailer’s stock is regular lines, while the other 30% changes continually. This business model allows prices to be kept to a minimum.
- 2.4.6 Home Bargains’ principal range includes health and beauty products, medicines, baby products, household products, toys and games, pet food, home furnishings and ornaments, seasonal products, ancillary food and drink products and a limited clothing range (all of which are already sold at Harlech Retail Park). This mix of goods form an integral part of Home Bargains’ business model with a varied value product offer, including bulky and non-bulky goods, as well as an ancillary food and drink offer.
- 2.4.7 The proposed HB store, when open, would generate up to 100no. full and part time job opportunities. Most of these job opportunities will be available to local people. Job opportunities within the store will be across a range of scales. In addition to jobs within the store itself, other employment opportunities will be created. These would include jobs created by the store fit out and merchandising the store, and jobs involved with the future maintenance and security of retail units; cleaners; security guards; etc.

2.5 LPA Pre-Application Consultation

- 2.5.1 The application submission follows discussions with NCC initiated in August 2023 whereby initial draft proposals were formulated and submitted for comment.
- 2.5.2 A formal pre-application consultation response was received from the LPA on 9 October 2023 which has assisted in guiding this submission by providing advice on the following points:
- The Highways Officer did not anticipate any critical issues and required confirmation that the proposed occupier would constitute a retail warehouse operation in order to



establish that there is sufficient overall capacity within the existing car park. **It can be clearly stated that Home Bargains does comprise a retail warehouse operation.**

- The Council would need to be satisfied that robust justification, in accordance with PPW, TAN 4 and the adopted Newport LDP has been provided with emphasis upon the demonstration of quantitative need. **Full justification is provided within this document.**
- In relation to the tests of need and impact, it is important that they are based on locally sourced information with a clear demonstration of quantitative need for the expanded range of goods floorspace. **See section 5 of this document.**
- If need demonstrated, the sequential test and impact assessment would be required. **See sections 6 and 7 of this document.**
- Based on the information supplied a retail impact assessment would be sought as both the individual and combined impact of this proposal on defined centres should be considered. **See section 7 of this document.**



3.0 PLANNING POLICY

3.1 Introduction

3.1.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The development plan for this site is:

- Future Wales: The National Plan 2040; and
- The Newport Local Development Plan (adopted January 2015).

3.2 Future Wales: The National Plan 2040 (February 2021)

3.2.1 Future Wales is the Welsh Government's highest tier of development plan in Wales. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under Policy 1 of this document, 'where Wales will grow', the Welsh Government supports sustainable growth in all parts of Wales and identifies 'Cardiff, Newport and the Valleys' as a National Growth Area.

3.2.2 The Welsh Government (WG) has adopted a 'Town Centre First' approach. Policy 6 notes that significant new retail facilities must be located within town and city centres. Developments of a 'significant' scale can broadly be defined as where the facility will serve a town, city or region-wide catchment. Planning authorities are encouraged to take a similar approach for smaller developments. A sequential approach must be used to inform the identification of the best location for these developments.

3.2.3 Policy 9 relates to Resilient Ecological Networks and Green Infrastructure. The policy notes that "In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals."

3.3 The Newport Local Development Plan (LDP) 2011-2026

3.3.1 The Newport LDP was adopted in January 2015 and covers the period 2011 to 2026. It forms part of the statutory development plan alongside Future Wales.

3.3.2 The LDP Proposals Map (extract at Figure 2, below) does not allocate the application site for any particular use. However, the Retail Park is shown as being located within the settlement boundary which typically means a presumption in favour of new development providing it complies with other LDP policies.



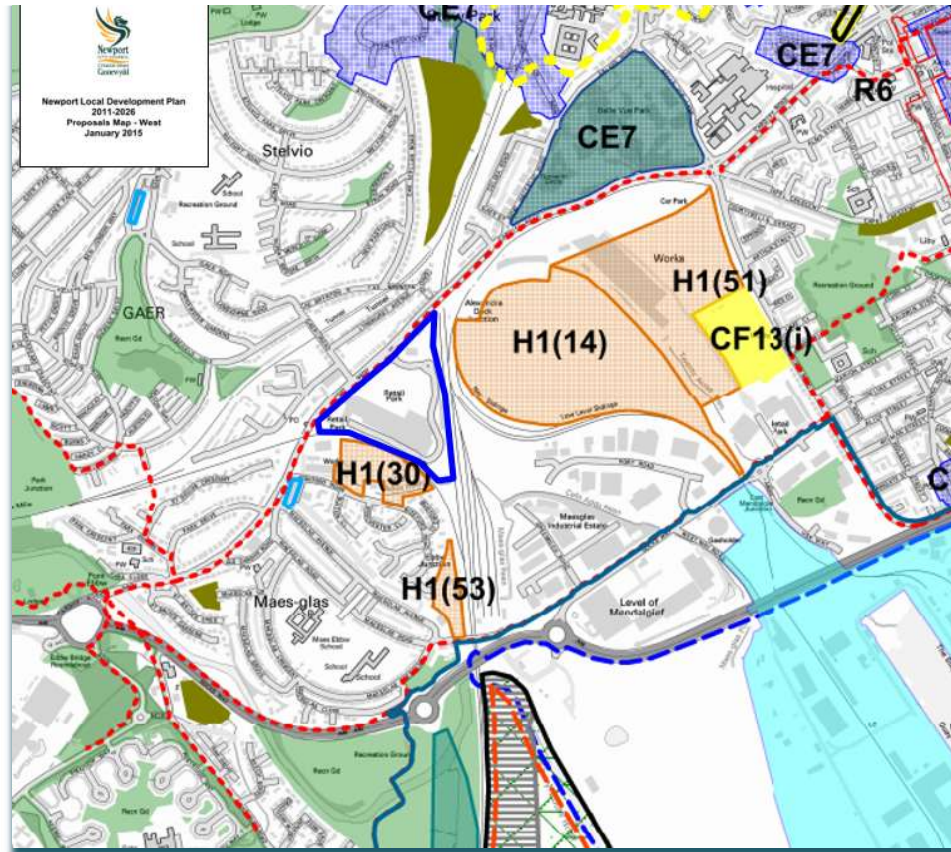


Figure 2: Extract from LDP Proposals Map (Harlech Retail Park shown outlined in blue)

- 3.3.3 In retail policy terms the site lies 'out of centre' and the nearest designated centre is Newport City Centre, which is the principal centre in the local hierarchy, below which are District Centres, Local Centres and Out of Centre retail sites.
- 3.3.4 **Policy R11 Development of Existing Out-of-Centre Retail Sites** explains that outside the city centre and district centres, proposals for redevelopments of and extensions to out-of-centre retail outlets, and garden centres, involving increases in floorspace to previous consents and/or changes to the range of goods sold will only be permitted provided that:
- need is identified;
 - the proposed development would not, either in its own right, or cumulatively with other out of centre developments and outstanding planning permissions, have an adverse effect on defined retail centres as a consequence of the type or range of goods sold;
 - the sequential test can be satisfied having regard to the availability, suitability and viability of city and district centre sites, or edge-of-centre sites which could accommodate the proposed retail uses;
 - the proposal would not increase the land area of the site;
 - the surrounding highway and transportation network has capacity to serve the development, and that accessing and servicing arrangements can be accommodated in a satisfactory manner;
 - the proposal is fully accessible on foot, by bicycle and by public transport.



- 3.3.5 The supporting text to this policy, at paragraph 8.33, advises that the desire on the part of retailers to improve the appearance and functioning of their premises is recognised, but care is required to ensure that there are not increases in floorspace for comparison goods, including convenience stores, that could adversely affect the City Centre or other defined retail centres. Conditions on ranges of goods to be sold will be imposed on new permissions, both for the new development and to bring up to date any existing consents.
- 3.3.6 **Policy SP19 Assessment of Retail Need** advises that retail and associated uses best located in a city centre will be subject to an assessment of need if not within a defined centre, and application of the sequential test if not within the city centre.
- 3.3.7 The supporting text to this policy, at paragraph 2.81, explains that in order to maintain and improve the retail and mix of uses on offer in the City Centre, a strong City Centre first approach will be taken. The sequential test will be strictly applied to ensure that the development proposed is appropriate for the site in relation to the retail hierarchy and if the proposal is not within the City Centre or a defined District Centre, need will have to be demonstrated.
- 3.3.8 The LDP goes on to explain that the nature and size of the activity proposed will affect how the Council will deal with the requirement to demonstrate need and application of the sequential test. Development should be of a scale appropriate to the retail centre within which they are located and should contribute to or sustain the vitality and attractiveness of that retail centre within the hierarchy (para. 2.83).
- 3.3.9 **Policy SP1 Sustainability** advises 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.

3.3.10 **Policy SP18 Urban Regeneration** outlines 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;
- iv) encourage the development of community uses where appropriate.

3.3.11 Other LDP policies of relevance include:

- GP1 General Development Principles - Climate Change
- GP2 General Development Principles - General Amenity
- GP4 General Development Principles - Highways and Accessibility
- GP5 General Development Principles - Natural Environment
- GP6 General Development Principles - Quality of Design

3.4 Planning Policy Wales Edition 12 (February 2024)

3.4.1 PPW 12 sets out the land use planning policies of the Welsh Government and is supported by Technical Advice Notes (TANs). In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, 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”.

3.4.2 Key sections relevant to the proposals include:

- **Previously Developed Land** - PPW 12 indicates that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development (para 3.55). One of the ‘Key Planning Principles’ is to ensure the efficient use of resources, including land, to deliver sustainable development.
- **Placemaking** - Paragraph 4.0.2 highlights that “...when planning and managing future development planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities including recreation, leisure, health and education”.
- **Needs Test** - PPW 12 advises that when determining planning applications for retail



uses, planning authorities should first consider whether there is a need for additional retail provision. Paragraph 4.3.15 explains that need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace.

- The Sequential Test** - PPW 12 indicates Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. It highlights that "the sequential approach applies to retail and all other uses complementary to retail and commercial centres". Paragraph 4.3.18 clarifies that by adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres. The key phrase here is 'new development'. As explained earlier the application proposals will not result in new retail floorspace being created and will not result in the development of land (ie no operational development or material change of use is proposed). Notwithstanding this, a sequential test has been undertaken as part of this assessment.
- New Out-of-Centre Developments** - Paragraph 4.3.20 states that "New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community and should not be allowed if they would be likely to put development plan retail strategy at risk".
- Retail Impact Assessment** - Paragraph 4.3.26 advises that all retail planning applications or retail site allocations of 2,500 sq. m or more gross floorspace that are proposed on the edge of or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.
- Economy & Jobs** - Section 5 of PPW12 at Paragraph 5.4.1 specifies that: "For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses". Paragraph 5.4.2 notes that "Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services".
- Healthy Lifestyles** – Promoting healthier places forms a key Well-Being Goal set out in PPW. Paragraph 3.22 states LPA's "...should develop and maintain places that support healthy, active lifestyles". Paragraph 3.20 highlights "Disadvantaged and deprived communities tend to be disproportionately affected by health problems".



- **Accessibility** - PPW sets out that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which for example: “are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car” (Paragraph 4.1.10). Paragraph 4.1.32 continues to indicate that: “Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling”.
- **Green infrastructure (GI)** - PPW explains that GI plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. Para. 6.2.4 advises that the planning system must maximise its contribution to the protection and provision of GI assets and networks as part of meeting society’s wider social and economic objectives and the needs of local communities. PPW further advises that a GI statement should be submitted with all applications and this will be proportionate to the scale and nature of the development proposed describing how GI 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 GI statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question.

3.5 Newport City Council Retail Study November 2019

- 3.5.1 Nexus Planning (Nexus) was commissioned by NCC to produce a Retail Study for Newport and its retail catchment area. The key findings of the study in respect of convenience and comparison goods retailing are set out below.

Convenience Retailing

- There five key foodstores that cater for around half of all convenience goods spending in the authority area, those being: Sainsbury’s at Albany Street; Tesco Extra at Newport Retail Park; Asda at Pencarn Way, Duffryn; Asda at Lower Dock Street, Pillgwenlly and Tesco Extra at Harlech Retail Park.
- None of these foodstores are located within the City Centre, with just the Tesco Extra and Asda being located in designated centres (Newport Retail Park and Commercial Road District Centres, respectively). This is indicative of Newport City Centre’s function as a central hub, with resident’s day-to-day functions serviced by the surrounding District Centres and out-of-centre facilities.
- Whilst these key stores remain dominant, it is noted that their share of the convenience goods market had fallen from almost 70% of all convenience goods spending in 2010 to 50% in 2018. This is reflective of the overall changes in convenience spending patterns identified across Newport.



- The trends over the last 8 years suggest an overprovision of convenience floorspace, which has resulted in underperforming stores. Each of the top five foodstores were shown to be trading below national averages. As such, the study's quantitative assessment did not identify any capacity for convenience growth or investment across Newport.
- The retention of convenience goods spend by Newport residents at foodstores in Newport remains healthy at 84%; however, this expenditure is now spread more widely amongst facilities across the authority area.

Comparison Retailing

- Newport resident's comparison goods spending is primarily distributed across facilities in Newport, Cardiff, and Cwmbran, which have a combined market share of 93% in both 2018 and 2010, demonstrating relatively concentrated shopping patterns amongst the City Council's residents.
- Whilst the spread of destinations for comparison goods spending has remained consistent since the Council's previous Retail Study, leakage to both Cardiff and Cwmbran has effectively halved over the last 8 years. Facilities in Newport retained 70% of resident's comparison goods spending in 2018, up from 44% in 2010.
- The increase in retention can be seen as a result of investment in facilities across Newport, notably Newport Retail Park and the City Centre, both of which showed increases in comparison goods market share since the previous Study.
- Resident's comparison goods spending in the City Centre itself grew from 21% to 25% between 2010 and 2018, whilst the Retail Park grew at a far greater rate, doubling its market share from just 7% to 15%.
- Newport Retail Park still has some way to go to rival the overall comparison goods turnover of the City Centre (particularly since the investment at Friars Walk). The challenge moving forwards is to ensure that the Council is able to differentiate the offer of the Retail Park from the City Centre, particularly in light of the lack of forecast capacity for new comparison goods floorspace across Newport in the short to medium term.



3.6 Newport Retail and Leisure Study Addendum 2023

3.6.1 In July 2023 Nexus was commissioned by NCC to produce an update to their 2019 Retail Study. The key findings of the Retail and Leisure Study (RLS) in respect of convenience and comparison goods retailing are set out below.

- A projected increase in population within the Council area of 16,780 persons over the period 2021-2036. This equates to an annual population increase of 1,119 persons and represents a 9.0% increase in population per annum over the period 2023-2036.
- There continues to be no demonstrable capacity for additional convenience goods facilities throughout the plan period. However, as seen in the interim period where new food store permissions have emerged, there may be evidential reasons to grant new permission on a case-by-case basis.
- Comparison goods capacity towards the end of the extended plan period to 2036. There is a significant negative capacity at the present time, with capacity beginning to emerge in the medium to longer term between 2030 and 2036. By 2036, the study identifies between 8,700 and 13,700 sq m net floorspace comparison goods capacity.

3.7 Policy Conclusions

- 3.7.1 National planning policy clearly seeks to proactively drive sustainable economic development to promote the vitality of our main urban areas. It confirms that the Welsh Government is committed to maximising opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales and advises that the planning system should be supportive of this aim.
- 3.7.2 In order to foster the delivery of sustainable development, planning policy requires local planning authorities to encourage and support developments which generate economic prosperity and regeneration.
- 3.7.3 The proposed development involves the re-use of an existing retail unit on an established Retail Park and in a location, which is recognised as benefitting from good public transport services and having excellent road links. The proposal would also help support existing businesses in the vicinity, facilitate further investment, development and potentially associated job opportunities in the area. The proposals would therefore clearly contribute towards the economic aims of planning policy and it can be concluded therefore that planning policy at all levels is fully supportive of the proposals.



4.0 ASSESSMENT OF EXISTING PROVISION

4.1 Introduction

- 4.1.1 The section of the assessment presents an analysis of the vitality and viability of centres within the catchment area of the proposed development. The following analysis draws upon established sources of retail data (such as Experian GOAD) and our own site visits/surveys and observations.
- 4.1.2 Firstly, we consider the Primary Catchment Area (PCA) and then provide an analysis of the vitality and viability of surrounding PCA based centres.
- 4.1.3 The section provides a 'health check' of nearby centres principally by assessing them against the measures of town centre vitality and viability identified in Technical Advice Note 4: Retailing and Commercial development.

4.2 The Primary Catchment Area

- 4.2.1 The primary catchment area (PCA) is the area in which the proposed development is anticipated to draw the majority of its trade. The extent of the PCA varies according to factors such as:
- the nature of the settlement involved;
 - the density of residential development in the vicinity of the site;
 - the prominence and accessibility of the proposed development in relation to the main road network and to public transport provision; and
 - the location of the development in relation to established competition.
- 4.2.2 Based on the findings of the Council's RLS 2019 the PCA of the proposed development is considered to constitute zones 1, and 5-7 of the RLS 2019 Study Area as shown on the plan attached at Appendix A.

4.3 Designated Centres

- 4.3.1 The focus of the assessment of existing provision has been on the following PCA based centres.
- Newport City Centre
 - DC6 - Commercial Road District Centre
 - DC7 - Handpost District Centre
 - LC8 - Clytha Park Road Local Centre
 - LC9 - St Woolos Local Centre
 - LC10 - Bassaleg Road Local Centre
 - LC11 - Gaer Road Local Centre
 - LC12 - Cardiff Road Local Centre



- 4.3.2 In accordance with PPW and TAN 4, a health-check assessment has been carried out of each of the centres, having regard to accepted vitality and viability indicators.

4.4 Newport City Centre

- 4.4.1 Newport City Centre is located in south-east Wales, 12 miles east of Cardiff and approximately 20 miles to the Severn Bridge connecting Wales to England. The River Usk runs along the eastern edge of the city with the M4 to the north.
- 4.4.2 Newport City Centre has a Conservation Area designation covering a large proportion of its retail centre extending from near the junction of High Street with the Old Green Crossing Road junction in the north to the junction of Commercial Street and Hill Street in the south. Most of the Conservation Area is also designated as an Archaeologically Sensitive Area. The five roads of Commercial Street, Stow Hill, Bridge Street, High Street and Skinner Street converge at Westgate Square, which is generally regarded as the central point of the City.

Diversity of Uses

- 4.4.3 The composition of units within Newport City Centre is set out in the Table 4.1 below. The figure provides a comparative view of different services within the centre (convenience, comparison, retail service, leisure services and financial & business services).

Table 4.1: Newport City Centre Composition of Units

Sector	March 2023		November 2023		April 2025		UK Average %
	No. of Units	%	No. of Units	%	No. of Units	%	
Convenience	34	6.13	31	5.77	37	6.67	9.42
Comparison	107	19.28	108	20.11	99	17.84	25.97
Retail Services	53	9.55	57	10.61	61	10.99	15.85
Leisure Services	126	22.70	119	22.16	117	21.08	26.68
Financial & Business Services	55	9.91	50	9.31	55	9.91	7.85
Vacant	180	32.43	172	32.03	186	33.51	14.02
Total	555	100	537	100	539	100	100

Notes: March 2023 and April 2025 sourced from Experian GOAD, November 2023 CS site visit

- 4.4.4 The highest outlet category in Newport City Centre is leisure services however this is still below the UK average of 26.68%. Financial & Business Services (9.91%) in March 2023, November 2023 (9.31%) and April 2025 (9.91%) are above the UK average of 7.85%.



Vacancies

- 4.4.5 The 2025 Goad Category Report shows that there were 186 vacant units, remaining broadly consistent at around 32-33%. Even though there is a higher than average percentage of vacancies, Newport City Centre offers a good range of services including various convenience stores, cafes and restaurants.

Pedestrian Flows

- 4.4.6 With regard to pedestrian flows, observations indicated that the area with the highest footfall is Commercial Street which is the main 'High Street' with the areas closest to Friars Walk and Kingsway Shopping Centres being the busiest. This is the main commercial hub of Newport with a high density of retail and with an especially high concentration of multiple retailers.
- 4.4.7 Furthermore, Commercial Street and both shopping centres have been pedestrianised by prioritising shoppers on foot and only allowing essential vehicle access. This along with other urban design features such as street furniture, public spaces and landscaping have greatly increased the appeal of this area to pedestrians creating the high amount of footfall observed.
- 4.4.8 This area also comprises many business buildings and office complexes which lead to a higher amount of footfall during commuting hours and consistently contribute to the daytime foot traffic. There were various commercial events occurring during our site visit, with small temporary stalls open in front of vacant units which influence the intensity of pedestrian flows around these areas. Overall, the city centre demonstrated high levels of activity on the site visit with Commercial Street demonstrating the highest number of pedestrian flows, especially near both Friars Walk and Kingsway Shopping Centres.

Accessibility

- 4.4.9 Access to the City Centre by public transport is extensive with both a large train station and bus station within a five-minute walk from the centre. The train station provides direct services to the rest of Wales and England, including Manchester, Nottingham and Cardiff. Newport train station is also used as a hub for national coach services which increase transport accessibility further across the UK.
- 4.4.10 Public transport is also available through Newport's bus services which operate from a large station in the city centre. The services available extend as far as Chepstow in the east, Monmouth in the north and Cardiff to the west. This provides excellent connections over a large scale contributing to the plentiful transport accessibility in Newport.
- 4.4.11 Private transport accessibility is also plentiful in the city centre. Both Friars Walk and Kingsway Shopping Centres have large multi-storey car parks which provide safe, secure and cheap parking directly in the city centre. Cycling infrastructure is available consistently



throughout the area with a dedicated indoor cycle storage unit in the city centre encouraging sustainable travel to the city. Overall Newport City Centre has strong transport, pedestrian and cycling infrastructure which contributes to a high level of overall accessibility.

Safety and Crime

- 4.4.12 The city centre felt mostly safe throughout the site visit. For such a large area there was the expected amount of CCTV and lighting especially in open areas to increase safety. Furthermore, signs along Commercial Street indicated the use of facial recognition technology to improve safety and decrease potential crime. There was also a strong police presence in Newport City Centre and this combined with the multiple private security officers in both Friars Walk and Kingsway Shopping Centres contributed to a strong sense of safety. Overall, Newport City Centre felt safe with the strong presence of CCTV, Police, security and lighting creating a sense of security.

Town Centre Environmental Quality

- 4.4.13 The city centre is generally well-maintained. Commercial Street and associated shopping centres have widespread street furniture including seating, litter bins and landscaping. These areas benefit from the lift in overall quality and amenity to the public realm which this provides. Various restaurants and cafes offer substantial outdoor seating which further increases the amenity of the area.
- 4.4.14 Overall, the environmental quality of the city centre is good and feels spacious however there are some areas further away from Commercial Street which suffer from poor quality frontages and litter issues which combined with a lack of street furniture and landscaping create a poor environmental quality in these areas.

Balance between Independent and Multiple Stores

- 4.4.15 There are 16 major retailers in the city centre. Major retailers are defined as one of the shops within the 30 national multiples that Goad has identified. Subsequently the Goad Category Report (April 2025) identified that there are 115 multiple retailers, including Iceland and Card Factory. Newport City Centre presents a good balance of independent and multiple stores, and this indicates that there is a diversity of shops which create a unique character to the City Centre.

Evening and Night-time Economy

- 4.4.16 There are many services in Newport City Centre which provide an evening and night-time economy. The centre has various clubs, pubs, restaurants and bars operating all evening and night-time, with limited convenience stores providing widespread services as well. Expectedly for a city there is an abundance of evening and night-time services available with a large proportion of the city centre solely devoted to this purpose.



4.5 Commercial Road District Centre

- 4.5.1 Commercial Road District Centre is found to the south of the city centre, on the main route in and out of the City Centre approximately 1.4km north east of the application site. The District Centre, which is one of the largest District Centres in Newport, is of linear formation.

Diversity of Uses

- 4.5.2 The composition of units within Commercial Road District Centre is set out in the Table 4.2 below.

Table 4.2: Commercial Road District Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	14	21.5	13	21.0	9.42
Comparison	6	9.2	5	8.1	25.97
Retail Services	13	20	13	21.0	15.85
Leisure Services	12	18.5	11	17.7	26.68
Financial & Business Services	3	4.6	1	1.6	7.85
Vacant	17	26.2	19	30.6	14.02
Total	65	100	62	100	100

- 4.5.3 The highest occupied outlet category in Commercial Road District Centre is Convenience Services, which is more than 10% higher than the UK average. Commercial Road District Centre shows a healthy mix of convenience, retail and leisure services.
- 4.5.4 Retail Services are also above the UK average. Overall, Commercial Road District Centre offers a good range of services including various retail and convenience store services.

Vacancies

- 4.5.5 There are 19 out of 62 outlets that are vacant, and this totalled to a percentage of 30.6%, which is higher than the UK average.

Pedestrian Flows

- 4.5.6 In respect of pedestrian levels, observations indicated that footfall was lower than would be expected of a large commercial district. The busiest areas were in the North centred around the large Asda store and declined Southwards towards the dwellings. All streets



demonstrated some levels of activity but were generally quiet possibly due to the wet and windy weather on the site visit.

Accessibility

- 4.5.7 The District Centre is easily accessible by both public and private transport. The centre is well located via public transport where two bus services; 40 and 41, provide regular services to the surrounding residential areas and wider areas including the city centre, Duffryn and Maesglas. Furthermore, Newport train station is just a 22-minute walk away.
- 4.5.8 Most of the pavements are well maintained and have a sufficient width to accommodate people with different impairments or health conditions, as well as older people with mobility difficulties. Provision for cyclists is generally good with cycle racks being provided along Commercial Road, however no dedicated off-road cycle routes were identified.

Safety and Crime

- 4.5.9 Throughout the site visit, Commercial Road felt relatively safe. There is a strong presence of CCTV and streetlights line the road. However, the large number of vacant outlets did give the street an unwelcoming impression and this was matched by some of the people outside these outlets.

Environmental Quality

- 4.5.10 The pavements are well kept and there are no major litter issues throughout the district centre, however, overall the district centre does not appear to particularly well kept with many shopfront and building frontages being of generally bad quality.

Balance between Independent and Multiple Stores

- 4.5.11 On Commercial Road there are 2 multiple retailers in the 62 outlets, the Asda supermarket which is situated behind the road and a Ladbrokes. Therefore, there is a dominance of independent stores in District Centre.

Evening and Night-time Economy

- 4.5.12 Most comparison services on Commercial Road close around 5pm. However, the Asda supermarket closes later at 10pm giving more flexibility to the district centre. There are some food takeaways open until late for dinner, but all the pubs have closed down and so the night-time economy has suffered.



4.6 Handpost District Centre

- 4.6.1 Handpost District Centre is found to the west of Newport City Centre. The centre is of linear formation with units predominately on one side of the road.

Diversity of Uses

- 4.6.2 The composition of units within Handpost District Centre is set out in the Table 4.3 below. The highest outlet category in Handpost District Centre is Leisure Services, which is c.5% higher than the UK average. Convenience, Retail and Leisure sectors are above the UK average. Overall, Handpost District Centre shows a healthy mix of convenience, retail and leisure services and offers a good range of services including cafes, takeaways and various retail and convenience store services.

Table 4.3: Handpost District Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	4	13.8	4	14.8	9.42
Comparison	5	17.2	4	14.8	25.97
Retail Services	6	20.7	7	25.9	15.85
Leisure Services	9	31.1	7	25.9	26.68
Financial & Business Services	5	17.2	4	14.8	7.85
Vacant	0	0	1	3.7	14.02
Total	29	100	27	100	100

Vacancies

- 4.6.3 There is just one vacant unit in the district centre.

Pedestrian Flows

- 4.6.4 In respect of pedestrian activity levels, the centre showed good levels of activity with many busy shops and cafes.

Accessibility

- 4.6.5 The district centre is easily accessible by both private and public transport. The centre is situated on a junction between the B4240 and Bassaleg Road with three bus stops, which gives it good access to the surrounding residential and urban areas. Bus routes include



Blackwood (151), Caerphilly (50) and Rogerstone (1). Furthermore, Newport train station is approximately a 13-minute walk from the district centre.

- 4.6.6 There were no provisions for cyclists, with no cycle racks for storage or dedicated cycle lanes being identified. Although the pavements were generally well maintained they were especially narrow and uneven at some points which may provide difficulties for people with different impairments or health conditions, as well as older people with mobility requirements.

Safety and Crime

- 4.6.7 During the visit Handpost District Centre felt safe. Regarding street lighting there seems to be sufficient lamp posts along the street especially at the busy crossroads to provide light at night. There was minimal graffiti.

Environmental Quality

- 4.6.8 The centre is well kept, with outdoor seating available at the cafeteria creating a more welcoming environment. There is a lack of landscaping and planters which decreases the overall quality and amenity of the public realm. There are no litter issues in the district centre. Subsequently, the streets and pedestrian areas seem generally well maintained. Overall the centre is in good shape with all the shopfronts and buildings frontages in very good quality throughout the site.

Balance between independent and multiple stores

- 4.6.9 On the site visit only two multiples, Monmouthshire Building Society and St David's Hospice Care, were identified, therefore, there a strong independent feel to the centre.

Evening and Night-time Economy

- 4.6.10 Most services in the Handpost district centre close between 4-5:30pm, however there are multiple food takeaways which operate into the evening closing at approximately 11:30pm. Consequently, the centre does provide limited evening and night-time economy.



4.7 Clytha Park Road Local Centre

- 4.7.1 Clytha Park Road Local Centre is located c.1.6km north of the application site. It consists of a small parade of shops either side of the main road and is anchored by a Tesco Express store.

Diversity of Uses

- 4.7.2 The composition of units within Clytha Park Road Local Centre is set out in the Table 4.4 below. The Local Centre is small with the highest occupied outlet category in Clytha Park Road Local Centre being Leisure Services, which is c.15% higher than the UK average.

Table 4.4: Clytha Park Road Local Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	1	5.9	2	15.4	9.42
Comparison	2	11.75	2	15.4	25.97
Retail Services	2	11.75	2	15.4	15.85
Leisure Services	7	41.2	5	38.5	26.68
Financial & Business Services	1	5.9	1	7.7	7.85
Vacant	4	23.5	1	7.7	14.02
Total	17	100	13	100	100

Vacancies

- 4.7.3 Out of the 13 units, 1 is vacant which is a 7.7% vacancy rate. This rate is lower than the UK average of 14.02%.

Pedestrian Flows

- 4.7.4 With regard to pedestrian flows, observations indicated that the busiest area is surrounding the Tesco Express store.

Accessibility

- 4.7.5 The local centre has accessibility by both public and private transport. The site is situated on the B4591 and is approximately a three-minute walk to Newport train station, this is



also the location of the nearest bus stops. Clytha Park local centre has limited cycling provisions, with three cycle racks available in the Tesco Express car park but no dedicated off-road cycling routes. Car parking at this local centre is good as it offers both on-street and off-street parking.

Safety and Crime

- 4.7.6 The local centre felt safe throughout the visit. There was adequate street lighting provided by streetlamps, and multiple CCTV cameras covering the local centre.

Environmental Quality

- 4.7.7 The local centre is tidy and well-maintained, although the centre does not have any street furniture. There were no major litter issues in the centre and the pavements appeared to be well kept.

Balance between independent and multiple stores

- 4.7.8 There is 1 multiple retailer in the local centre. This shows that there is a dominance of independent stores in the local centre and this is normal for a centre of this size.

Evening and Night-time Economy

- 4.7.9 There are many services in Clytha Park Road Local Centre which are open until 11pm, creating an evening and night-time economy in the centre. Convenience stores such as Tesco close at 11pm every day and the various takeaways and restaurants provide this local centre with a limited evening and night-time economy throughout the week.

4.8 St Woolos Local Centre

- 4.8.1 St Woolos Local Centre is located c.1.2km from the application site. It consists of a very small parade shops.

Diversity of Uses

- 4.8.2 The composition of units within St Woolos Local Centre is set out in Table 4.5 below. The centre totals just 7 units and is served by a small convenience store.



Table 4.5: Woolos Clytha Park Road Local Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	1	11.1	1	14.3	9.42
Comparison	1	11.1	1	14.3	25.97
Retail Services	2	22.2	3	42.9	15.85
Leisure Services	2	22.2	1	14.3	26.68
Financial & Business Services	0	0	0	0	7.85
Vacant	3	33.3	1	14.3	14.02
Total	9	100	7	100	100

Vacancies

- 4.8.3 During the site visit, it was identified that there is 1 vacant unit out of 7, which equates to 14.3% against a national average of 14.02%. This shows that St Woolos has broadly the national average proportion of vacant units that the index figure.

Pedestrian Flows

- 4.8.4 In respect of pedestrian activity levels, observations indicated that the busiest areas are to the west of the centre adjoining the large junction on Stow Hill. There was also the relatively highest footfall around the laundrette which was the busiest unit out of the nine at the time of our visit. Overall, the local centre demonstrated good levels of activity.

Accessibility

- 4.8.5 The centre is easily accessible by both public and private transport alike. The local centre is situated on the B4240 and includes two bus stops both just beyond the centre boundary. These bus stops provide services to the surrounding residential areas and neighbouring villages and towns such as, Gaer (2), Caerphilly (50) and Blackwood (151). Newport train station is approximately a 12-minute walk from the local centre.
- 4.8.6 There are no dedicated off-road cycle routes and cycle racks.
- 4.8.7 Car parking in the centre is good, offering free public parking, including EV charging points.



Safety and Crime

- 4.8.8 St Woolos felt safe throughout the visit. There were sufficient CCTV cameras installed in front of shops. In terms of street lighting, there seems to be sufficient lighting in the local centre to accommodate safety at night.

Environmental Quality

- 4.8.9 The local centre is well kept and has ample street furniture outside of Newport Cathedral. There is also plenty of landscaping around the centre and a historical landmark which contributes to the quality of the public realm. There are no major litter issues in the area and the streets and pavements are well maintained.

Balance between Independent and Multiple Stores

- 4.8.10 There are no multiple retailers in the local centre and a dominance of independent stores in the local centre which is considered normal given the size of the local centre.

Evening and Night-time Economy

- 4.8.11 In St Woolos all the shops close at 5pm except for a convenience store which closes at 10pm and a restaurant which closes at 11pm. This shows that the local centre does have a limited evening and night-time economy as expected for such a small centre.

4.9 Bassaleg Road Local Centre

- 4.9.1 Bassaleg Road Local Centre is located c.900 metres from the application site. It consists of a small parade of shops and a former garage which has been converted to a post office and a Spar shop.

Diversity of Uses

- 4.9.2 The composition of units within Bassaleg Road Local Centre is set out in Table 4.6 overleaf. The highest outlet categories in Bassaleg Road Local Centre are Convenience and Leisure Services, which shows that the Convenience Sector is some 24% higher than the UK average and the Leisure Sector is 6.65% higher than the UK average.



Table 4.6: Bassaleg Road Local Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	2	33.33	2	33.33	9.42
Comparison	1	16.66	1	16.66	25.97
Retail Services	1	16.66	0	0	15.85
Leisure Services	2	33.33	2	33.33	26.68
Financial & Business Services	0	0	0	0	7.85
Vacant	0	0	1	16.66	14.02
Total	6	100	6		100

- 4.9.3 Convenience and Leisure Sectors are above the UK average. Overall, Bassaleg Road Local Centre shows a healthy mix of convenience, comparison, retail and leisure services and offers a good range of services including two convenience shops and two takeaway services.

Vacancies

- 4.9.4 During the site visit, only one vacant unit was identified. Although this brings the percentage of vacant units above the national average, due to the small size of the local centre, and the fact that this unit was currently under alteration at the time of the survey, this should not be cause for concern.

Pedestrian flows

- 4.9.5 In respect of pedestrian activity levels, observations indicated that the busiest area is close to the Spar store. The east of the retail centre has a low footfall compared to other areas of the centre. All streets demonstrated good levels of activity and the centre was perceived to have sufficient levels of activity throughout the site visit on a Friday morning.

Accessibility

- 4.9.6 The Local Centre is easily accessible by both public and private transport. The centre is well connected via public transport. There are bus stops located adjacent to the local centre and opposite to the local centre (Gaer Park Shops) and these two bus stops provides regular services to the surrounding residential areas, Newport city centre and wider areas including Clytha Park, Blackwood, and Caerphilly.



4.9.7 Majority of the pavements within the Local Centre are well maintained and has a sufficient width. Provision for cyclists is adequate, although no dedicated off-road cycle routes were identified.

4.9.8 Car parking in the centre is sufficient for customers and the car parking is free.

Safety and Crime

4.9.9 Throughout the site visit, Bassaleg Local Centre felt safe. For a small retail centre, there were sufficient CCTV cameras installed outside the convenience stores. In terms of lighting, there are sufficient street lighting in the retail centre to provide safety at night.

Environmental Quality

4.9.10 The Local Centre is well kept, however there is no street furniture present at the site. There are no major litter issues in the Local Centre and the streets and pavements are well maintained. Overall, the centre is in a good shape with shopfronts and building frontages generally of good quality in the centre.

Balance between Independent and Multiple Stores

4.9.11 There are two multiple retailers i.e., One Stop and Spar within the Local Centre. For a small retail centre, Bassaleg Road Local Centre presents a good mix of independent and multiple stores, and this shows that there is a diversity of shops which create a unique character to the Local centre.

Evening and Night-time Economy

4.9.12 The two convenience stores at Bassaleg Road Centre closes at 11pm. The fish & chips takeaway unit closes at 9:30, therefore the closing time for the convenience store and takeaway shows that Bassaleg Road Local Centre has an evening and night-time economy.

4.10 Gaer Road Local Centre

4.10.1 Gaer Road Local Centre is located c.750m from the application site. It consists of a parade of shops with parking to the front.

Diversity of Uses

4.10.2 The composition of units within Gaer Road Local Centre is set out in table 4.7. The highest outlet category in Gaer Road Local Centre is Convenience Sector, which is 32.39% higher than the UK average. Gaer Road Local Centre shows a healthy mix of convenience and



retail services and offers a good range of services including various convenience stores.

Table 4.7: Gaer Road Local Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	5	41.66	3	33.33	9.42
Comparison	1	8.33	1	11.11	25.97
Retail Services	4	33.33	1	11.11	15.85
Leisure Services	1	8.33	3	33.33	26.68
Financial & Business Services	0	0	0	0	7.85
Vacant	1	8.33	1	11.11	14.02
Total	12	100	9	100	100

Vacancies

- 4.10.3 During the site visit, it has been identified that there is one vacant unit, which equates to 11.11% against a national average of 14.02%. The low percentage shows that Gaer Road Local Centre is a healthy local centre with a strong retail presence.

Pedestrian flows

- 4.10.4 In respect of pedestrian activity levels, observations indicated that the busiest area is close to the Lifestyle Express Store. In general, the retail centre has a moderate footfall.

Accessibility

- 4.10.5 The Local Centre is well connected via public transport. There are two bus stops located within close proximity of the Local Centre. These bus stops are Gaer Community Centre and Gaer Shops. The bus stops provide services to Newport City Centre and surrounding residential areas e.g., Rhiwderin.
- 4.10.6 The majority of the pavements within the Local Centre are well maintained with a sufficient width to provide accessibility for people with different impairments or health conditions, as well as older people with mobility requirements. Provision for cyclists is adequate, although no dedicated off-road cycle routes were identified.
- 4.10.7 Car parking in the Local Centre is good and is free of charge.



Safety and Crime

- 4.10.8 Throughout the site visit, Gaer Road Local Centre felt safe. In terms of lighting, there was sufficient lighting in the retail centre to provide safety at night.

Environmental Quality

- 4.10.9 There is a bench just outside of the boundary of the Local Centre and this creates a welcoming environment and lifts the overall quality and amenity of the public realm. The retail centre is well kept and there are litter boxes present within the retail centre. Overall, the centre is in a good state with shopfronts and building frontages generally of good quality.

Balance between independent and multiple stores

- 4.10.10 There is no major retailer present in Gaer Road Local Centre but there is one multiple retailer i.e., Lifestyle Express within the Local Centre. For a small Local Centre, Gaer Road Local Centre presents a fair mix of independent and multiple stores, and this shows that there is a diversity of shops which create a special character to the Local centre.

Evening and Night-time Economy

- 4.10.11 The two hairdressers at Gaer Road Local Centre closes at 8pm. The takeaway closes at 10:30pm – 11pm and this late closing time indicates that Gaer Road Local Centre has an evening and night-time economy.

4.11 Cardiff Road Local Centre

- 4.11.1 Cardiff Road Local Centre is just 300m to the south of the application site. It consists of a small parade of shops.

Diversity of Uses

- 4.11.2 The composition of units within Cardiff Road Local Centre is set out in Table 4.8 below.



Table 4.8: Cardiff Road Local Centre Composition of Units

Sector	November 2023		January 2026		UK Average %
	No. of Units	%	No. of Units	%	
Convenience	3	27.27	3	30	9.42
Comparison	1	9.09	0	0	25.97
Retail Services	2	18.18	2	20	15.85
Leisure Services	5	45.45	3	30	26.68
Financial & Business Services	0	0	0	0	7.85
Vacant	0	0	2	20	14.02
Total	11	100	10	100	100

- 4.11.3 The highest outlet category in Cardiff Road Local Centre is Leisure Services, which is higher than the UK average. Cardiff Road Local Centre shows a healthy mix of convenience, retail and leisure services.

Vacancies

- 4.11.4 During the site visit, it has been identified that there are two vacant units. This is higher than the national average but given the centre's small size, should not be cause for concern.

Pedestrian flows

- 4.11.5 In respect of pedestrian activity levels, observations indicated that the busiest areas were those close to the two takeaways, and the Spar located at the centre of the terraced retail centre. The south of the retail centre has a low footfall compared to the north. All streets demonstrated good levels of activity and the centre was perceived to be busy with sufficient levels of activity throughout the site visit.

Accessibility

- 4.11.6 The Local Centre is well connected via public transport. Three bus services at Maes-glas Shops bus stop provides regular services to the surrounding residential areas and wider areas including Cardiff, Newbridge and The Duffryn. The Maes-glas Shops bus stop is located opposite to the retail centre.
- 4.11.7 The majority of the pavements within the Local Centre are well maintained with a sufficient width to provide accessibility for people with different impairments or health conditions, as well as older people with mobility requirements. Provision for cyclists is adequate, although no dedicated off-road cycle routes were identified.
- 4.11.8 The free car parking in the centre is limited but adequate for customers.



Safety and Crime

- 4.11.9 Throughout the site visit, Cardiff Road Local Centre felt safe. For a small retail centre, there were sufficient CCTV cameras installed. In terms of lighting, there are sufficient lighting in the retail centre to provide safety at night.

Environmental Quality

- 4.11.10 There is a bench just outside of the boundary of the Local Centre and this creates a welcoming environment and lifts the overall quality and amenity of the public realm. Some areas of the local retail centre are unkempt, with litter present in some areas although there are two litter boxes within the centre. Overall, the centre is in a good shape with shopfronts and building frontages generally of decent quality in the centre.

Balance between independent and multiple stores

- 4.11.11 There is no major retailer present in Cardiff Road Local Centre but there 3 multiple retailers i.e., Coral, Spar and Lifestyle Express within the Local Centre. For a small Local Centre, Cardiff Road Local Centre presents a good mix of independent and multiple stores, and this portrays that there is a diversity of shops which create a unique character to the Local centre.

Evening and Night-time Economy

- 4.11.12 The two convenience stores at Cardiff Local Centre close at 10-11pm. One of the takeaway units closes at 12am and this shows that the late closing time indicates that Cardiff Local Centre has an evening and night-time economy.

4.12 Other Local Centres

- 4.12.1 Other centres within the catchment area include:
- Malpas District Centre
 - Laurel Drive, Bassaleg Local Centre
 - Thornbury Park, Highcross Local Centre
 - Greenfield Stores, Rogerstone Local Centre
 - Malpas Road Local Centre
 - Russell Drive, Malpas Local Centre
 - Almond Drive, Malpas Local Centre.



- 4.12.2 These retail centres are far smaller and/or more distant than the above referenced centres; they have a very limited retail and service offer and meet a distinctly local function and are unlikely to be affected by the proposed development.

4.13 Summary

- 4.13.1 In summary, the majority of the retail centres appears to be in good health, are easily accessible, and perceived to be safe, well maintained shopping environments. As expected, the larger retail centres e.g., Newport City Centre and the District Centres showed the strongest diversity of uses; with most having strong retail offers. The centres are considered to be vital and viable in servicing their district, local or neighbourhood functions.



5.0 THE NEED FOR THE PROPOSED DEVELOPMENT

5.1 Introduction

- 5.1.1 This section of the report assesses the retail 'need' for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP.
- 5.1.2 The Welsh Government does not prescribe any particular methodology for undertaking need assessments, and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (Para 6.3, TAN4).
- 5.1.3 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other non-numerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 5.1.4 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.

5.2 Quantitative capacity

- 5.2.1 NCC adopted its LDP in January 2015 which covers the period up to 2026. Nexus Planning (Nexus) was commissioned by Newport City Council (NCC) in December 2018 to produce a Retail & Leisure Study (RLS 2019) for Newport and its retail catchment area. The Study was subsequently updated by an Addendum produced by Nexus in July 2023. The Study and its Addendum is underpinned by a household survey of local shopping patterns. The RLS is used to inform planning decisions relating to future retail provision over the plan period.
- 5.2.2 Consistent with standard retail industry methodology, the RLS projects forward available expenditure per capita and population growth for each survey zone in the Study Area in future years, in order to understand future capacity for additional retail development. This growth is shown in Tables 2a and 8 at Appendix A of the RLS Addendum 2023, which shows growth in convenience and comparison expenditure across Newport City Council Area owing both to local population and expenditure increases.



- 5.2.3 Table 5.1 below is based on the information set out in RLS Addendum 2023. It specifically outlines the growth in expenditure in the Primary Catchment Area (PCA) of the proposed development; the PCA is the area in which the proposed development is assessed to derive the majority of its trade. Based on the findings of the RLS Addendum 2023 this is considered to constitute zones 1, and 5-7 of the RLS 2019/23 Study Area.

Table 5.1: Total Food Expenditure Growth in PCA, 2023-2031

	2023	2026	2031	Growth (£m)	
				2023-2026	2026-2031
	[1]	[2]	[3]	[4]	[5]
PCA					
Zone 1	77.5	78.1	80.6	0.6	2.5
Zone 5	45.3	45.7	47.1	0.4	1.4
Zone 6	15.4	15.5	16.0	0.1	0.5
Zone 7	44.3	44.7	46.1	0.4	1.4
Total	182.5	184.0	189.8	1.5	5.8

Notes

[1], [2], [3] taken from Table 2a of RLS Addendum 2023

[4] = [2]-[1]

[5] = [3]-[1]

- 5.2.4 The above table shows the RLS 2023 assessed local population and expenditure growth is anticipated to equate to growth in PCA food expenditure of £1.5 up to 2026, and £7.3m to 2031. In the same manner, Table 5.2 below shows the RLS 2023 assessed local population and expenditure growth is anticipated to equate to growth in non-food expenditure of £6.9m up to 2026, and £45.2m to 2031.

Table 5.2: Total Non-food Expenditure Growth in PCA, 2023-2031

	2023	2026	2031	Growth (£m)	
				2023-2026	2026-2031
	[1]	[2]	[3]	[4]	[5]
PCA					
Zone 1	89.3	92.1	107.6	2.8	15.5
Zone 5	50.6	52.2	61.0	1.6	8.8
Zone 6	21.3	21.9	25.6	0.6	3.7
Zone 7	59.7	61.6	71.9	1.9	10.3
Total	220.9	227.8	266.1	6.9	38.3

Notes

[1], [2], [3] taken from Table 8 of RLS Addendum 2023

[4] = [2]-[1]

[5] = [3]-[1]

- 5.2.5 Table 26b of the Nexus RLS Addendum 2023 finds capacity or 'need' for between 3,000sqm net (sales) and 4,700sqm net (sales) of additional non-food floorspace by 2031.



5.2.6 Table 5.3 below provides a comparative assessment of the benchmark turnovers of the former and proposed operators in Unit 1, to help understand how this compares with the identified capacity. It is important to note that the proposed new operator (Home Bargains) will replace the previous operator with no new floorspace proposed. The existing net retail sales area in Unit 1 is 2,086sq m, and with the previous occupier (Homebase), the estimated turnover would be £4.9m at 2026 and £5.5m at 2031, assuming their company average sales density from Retail Rankings.

5.2.7 It should also be recognised that a 'fall back' scenario exists here, where the unit is occupied by a retailer without needing to amend the restrictive goods condition. For example, if a furniture retailer were to take the unit the turnover (and therefore the impact) of the unit would be significantly higher at £10-£11m. An electrical retailer, also permitted under the existing restriction, would be materially higher again.

5.2.8 It can be seen below, in comparative terms, a proposed new operator trading under a Class A1 (open) consent (with up to 30% food floorspace), is anticipated to lead to a modest increase in turnover at Unit 1 compared to the previous occupier i.e. c.£3.7m. As outlined above, there is more than sufficient capacity in the PCA to support this modest increase in turnover. Compared to a potential fallback furniture occupier, the proposed development results in a modest *reduction* in turnover.

Table 5.3: Turnover

	Gross Floorspace sqm	Net Floorspace sqm	Sales density £/sqm	Turnover 2026 £m	Turnover 2031 £m
	[1]	[2]	[3]	[4]	[5]
Previous occupier					
Unit 1 (Homebase)	2,608	2,086	2,355	4.9	5.5
Fallback occupier					
Furniture occupier	2,608	2,086	4,842	10.1	11.3
Proposed Occupier					
Unit 1 (Home Bargains)	2,608	2,347			
Non-food		1,643	4,066	6.7	7.5
Food (up to 30%)		704	4,066	2.9	2.9
Total				9.5	10.3
Difference compared to Homebase +/-				+4.6	+4.8
Difference compared to fallback +/-				-0.6	-1.0

Notes:

[1] application drawings

[2] derived from application drawings and information provided by TJ Morris

[2] proposed occupier: 30% food and drink floorspace

[3] Derived from Mintel Retail Rankings (Homebase and representative furniture retailer) and information provided by TJ Morris

[4] [2]x[3]/1,000,000

[5] turnover growth to 2031 based on assumed f/s efficiency increase (0.0% conv and 2.3% comp p/a) (EXRPBN 22 Figs 4a&b (Mar 2025))



- 5.2.9 Based on the above analysis there is identifiable quantitative capacity or ‘need’ in the Primary Catchment Area for the proposed retail development. We note the RLS 2019 advises, at paragraph 4.28, that any identified retail capacity across the Study Area does not necessarily equate to justification for new retail floorspace in itself (especially in out-of-centre locations), and any such development would be required to be assessed in line with TAN 4 and PPW policy, however it is important to reiterate no new retail floorspace is proposed. Indeed, the identified need is intended to be met at an established, co-located retail destination. Equally, it is also important to note the RLS 2019 acknowledges the converse also applies, insofar as any perceived lack of capacity should not specifically rule out retail developments where other material factors support such development (paragraph 4.29).

5.3 Qualitative Considerations

- 5.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.
- 5.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.

Meeting Local Consumer Need, Locally

- 5.3.3 There is existing latent demand for improved variety store representation in Newport. A strong local value proposition is required to serve the local area which will help people with the prevailing cost-of-living crisis. By improving local choice, Newport will be better equipped to meet local needs and, in turn, counteract any propensity for shoppers to shop further afield.
- 5.3.4 The store layout is sufficiently spacious and well equipped to stock and cater for a variety of goods. It will prove to be a popular, competitively priced and conveniently located destination for local residents. The co-location of the proposed occupier with other retailers at the Park is anticipated to encourage linked-trips with existing operators. In this regard the proposals would be of direct benefit to local shoppers.

Other Material Considerations



- 5.3.5 The use proposed is to cater for an occupier which will create up to approximately 100 full and part time jobs. The posts will be both skilled and non-skilled and range from cleaners to managers.
- 5.3.6 The value of retail sector employment is recognised in PPW and jobs are likely to appeal to a wide cross section of local people. PPW identifies the importance of economic land uses, highlighting the definition extends to retail, tourism and public services, in addition to the more traditional employment land uses, all of which create wealth, jobs and income. PPW also advises it is essential to make provision for the needs of the entire economy and not just the traditional Class B1-B8 uses, and that the numbers and types of jobs expected to be created should form a key consideration.
- 5.3.7 These positive economic and social benefits and impacts (both direct and indirect) are material considerations that weigh heavily in favour of the proposals.

5.4 Summary

- 5.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. Improved retail provision will help counteract unsustainable travel and will ensure local needs are met locally in accordance with PPW's sustainable development principles and placemaking objectives.
- 5.4.2 Accordingly, in respect of PPW guidance, need for the proposed development has been demonstrated.



6.0 THE SEQUENTIAL APPROACH TO SITE SELECTION

6.1 Introduction

6.1.1 The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.

6.1.2 Key considerations in carrying out the sequential test on each potential site include:

- The likelihood of the site becoming available within a reasonable period of time;
- suitability of the site for the proposed development; and
- viability for the proposed use.

6.1.3 This section of the report details the applicant's consideration of sequential site assessment in proposing the development. In doing so, it considers recent case law and high court judgements in regard to the application of the sequential test, including in regard to the need for 'disaggregation'.

6.2 Status of the Application Site

6.2.1 The application site lies at an out of centre location in retail policy terms. Notwithstanding this, the site constitutes an existing retail unit at an established retail destination; in this respect, the proposed development is logical.

6.3 Application of the Sequential Approach

6.3.1 The approach adopted in this assessment is consistent with the recommendations and guidance set out in PPW and TAN4 and prevailing judicial authority regarding the application of the sequential test.

6.3.2 It is important that the sequential approach is applied in a policy and legally compliant manner. Several appeal and Court cases have helped shape application of the sequential test. The following section provides a summary of the key matters regarding the application of the sequential test including applying flexibility, "suitability" and the need to "disaggregate."

- When looking at the suitability of potential sequential sites, flexibility should be



demonstrated on issues such as format and scale. The definition of suitability is pertinent to the consideration of flexibility of format and scale. The definition was clarified in February 2012 by the Supreme Court in *Tesco Stores v Dundee City Council*¹. Since this time the Judgment has been recognised and applied by the High Court, Secretary of State and Inspectors in England and Wales. The Dundee Judgment identifies that provided the applicant has demonstrated flexibility with regard to format and scale, the question is “whether an alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit an alternative site.” (Dundee, paragraph 29).

- For a sequentially preferable site to be suitable, it must be “suitable for the development proposed by the applicant.” The “whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer.” (Dundee², paras 24 and 38);
- “to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer.” (Dundee, para 28). Accordingly, the application of the sequential test is “for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.” (Dundee, para 38);
- Neither PPW or TAN 4 asks whether such sites are likely to become available during the remainder of the plan period or over a period of years and no indication is given of the degree of flexibility required of applicants.
- The *Aldergate Properties v Mansfield DC* High Court Judgment³ found that in applying the sequential test the identity of an applicant is not “generally” relevant but that “there are instances where identity may matter”.
- Furthermore, the appellant’s own commercial objectives are relevant to the question of suitability, even where these are site specific (*Telford Forge*⁴ appeal, para 16).
- In the *Scotch Corner* appeal⁵ the SoS endorsed the Inspector’s conclusion that the NPPF does not require disaggregation. This sets a baseline position where the SoS has decided disaggregation does not apply.

¹ *Tesco Stores Limited v Dundee City Council* (*Tesco Stores Ltd v. Dundee City Council* [2012] UKSC13)

² *Ibid*

³ *Aldergate Properties v Mansfield DC* High Court Judgment [2016] EWHC 1670

⁴ *Telford Forge Retail Park* (Appeal Ref. APP/C3240/A/12/2172756)

⁵ APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, Scotch Corner, Dec 2016



- Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore that disaggregation is not a policy requirement.
- For a site to be suitable, it would have to be a genuine “real world” alternative for the development. If the appeal were dismissed, would the developer build the development on the sequentially preferable site is the relevant question (Telford Forge appeal, para 19).

6.3.3 In this instance, the fundamental rationale for the proposed development is to allow an existing retail unit in the applicant’s existing ownership and control to be re-let. The existing unit is considered readily available and suitable to accommodate the proposed development requirements; the reoccupation of an existing unit with minimal intervention is, in this respect, considered to be sustainable. In the “real world”, there is considered to be no practicable alternative to the proposed development site. If the application were to be refused, the applicant could not acquire and build a new store in e.g. Newport City Centre, given the practical and financial ramifications of acquiring a site and building a new store, compared with reletting the existing unit. Even if they were to do so, the existing unit would remain and would continue to need to be re-let.

6.3.4 PPW makes clear the sequential approach requires pragmatism and flexibility from local planning authorities. In this instance the conclusion must be this: the proposed development is to facilitate a reletting of an existing unit; the sequential test cannot reasonably be applied in the same manner as applied to development of a new store. Since the proposal is for a re-let of a unit in the applicant’s ownership and control, in practical terms there is logically no sequentially preferable site for the development proposed on the edge of or within the nearest centres which may accommodate the development.

6.4 Site Search Parameters

6.4.1 Home Bargains has a number of specific requirements arising from its trading profile which include:

- a minimum net floorspace of c.2,300sqm on a single level (as per Home Bargains’ published property requirements), preferably with additional external display space. There is no prospect for disaggregation in this instance;
- a dedicated car park immediately adjacent to the site with little or no change in levels so that customers can easily transfer goods to their vehicles from the store. To have otherwise would severely impact the appeal and viability of the store;
- A prominent site with the ability to attract passing trade;



- A site that is easily accessible by a choice of means of transport; and
- Provision of a dedicated service area to the rear of the store, including the ability to accommodate HGVs (Heavy Goods Vehicles).

6.4.2 All of the above are key operational and locational requirements.

Definition of Availability

6.4.3 Any sequential site needs to be available or expected to be available within a reasonable period.

6.4.4 If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be secured, then a site cannot reasonably be considered to be available. If a potential alternative site does not satisfy the availability test it is not sequentially preferable.

6.4.5 Subject to securing permission the proposed development could be implemented immediately. Accordingly, for a potential alternative site being considered available in the context of the subject proposals it must be available in a timeframe that could allow a scheme to be implemented immediately. In this instance, anything beyond 3 months is not considered to be a “reasonable period”.

6.5 Sequential Site Search

6.5.1 The applicant has undertaken a site search of potential in-centre and edge-of-centre locations. The focus of the sequential search is Newport City Centre. This process has included:

- an analysis of adopted development plan policy documents; and
- a review of potential city centre and edge-of-centre sites/units.

6.5.2 A review of the adopted development plan does not highlight any allocated in-centre sites which may be sequentially preferable to accommodate the proposed development.

6.6 Newport City Centre

Kingsway Shopping Centre

6.6.1 The Kingsway Shopping Centre is an under-cover shopping centre in Newport city centre adjoining the Friars Walk shopping and leisure complex with pedestrian access from John Frost Square and Commercial Street. The shopping centre is served by a multi-storey car park.



- 6.6.2 The Kingsway Shopping Centre has a number of vacant retail units, ranging in size from 75sqm to 1,050sqm. However, these are too small to accommodate the proposed operator.

Basement Space, Kingsway Shopping Centre

- 6.6.3 This comprises a large previously fitted basement unit offering up to 4,750sqm of floorspace below the 'Little Kingdom' children's play centre. However, as a basement unit, there are significant concerns regarding viability as the unit is not sufficiently visible from the road.
- 6.6.4 Furthermore, in terms of customer experience, there is a gradient down from the Emlyn Walk which is unsuitable for customers with shopping trolleys.
- 6.6.5 In summary this unit is not suitable and at best would result in a compromised store that would not be able to operate efficiently.
- 6.6.6 There is also uncertainty over the future of the centre as Kingsway Investments (Newport) LLP who are the leaseholders of the Kingsway Shopping Centre were placed into liquidation in August 2020 due to financial difficulties. The Centre was sold in September 2023 at auction to an unnamed buyer.
- 6.6.7 Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this Kingsway unit were considered to be suitable in other respects (which it is not), it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park vacant and in need of reletting.

Site of the Former Newport Centre, Kingsway

- 6.6.8 The Newport Centre, prior to it be demolished, was a multi-purpose facility run by Newport Live, a registered charitable trust operated on behalf of Newport City Council. The Newport Centre offered a multi-purpose sports hall, fitness suite/gym and swimming pool.
- 6.6.9 In October 2022 outline planning permission was granted for the demolition of the Newport Centre and its redevelopment for circa 54,000 square metres of flexible floorspace for educational use, or any other use within use classes A1 (shops), A2 (financial and professional services), A3 (food and drink), B1 (business), C1 (hotels), D1 (non-residential institutions) and D2 (assembly and leisure).
- 6.6.10 Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. As the former Newport Centre has now been demolished it cannot be counted as a valid alternative to re-letting an existing retail unit and the letting of any floorspace naturally



depends on the approved redevelopment (or other such similar proposal) becoming a reality. This is not likely to happen within the next three months. Therefore, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

68-72 Commercial Street, Newport

- 6.6.11 68-72 Commercial Street is situated on and immediately west of Commercial Street and comprises a variety of buildings, with retail space (albeit a large proportion of units are vacant) at ground floor with ancillary storage and/or office space on the upper floors. The buildings front onto Commercial Street to the west and Emlyn Walk to the north which provides a route from Commercial Street to the Kingsway Shopping Centre.
- 6.6.12 The units individually and in their current form are not large enough to accommodate the proposed development. Whilst the site does offer the opportunity for retail floorspace in the future it is clearly not going to be available within the next three months and has therefore been discounted on the grounds that it not expected to be available within a reasonable time period.
- 6.6.13 Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this unit were considered to be suitable and available in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

77 – 80 Commercial Street, Newport

- 6.6.14 77-80 comprises four units fronting onto Commercial Street, with retail space (albeit all four units are vacant) at ground floor with ancillary storage and/or office space on the upper floors.
- 6.6.15 The units individually and in their current form are not large enough to accommodate the proposed development. Even allowing for merging the four properties to form one unit this still would not provide the required floorspace and so these have been discounted on the grounds of being too small and therefore unsuitable.
- 6.6.16 Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if these units were considered to be suitable in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.



81-82 Commercial Street, Newport

- 6.6.17 No 81-82 Commercial Street comprises an 'L' shaped building with a footprint of approximately 1,110 sq.m. The unit is not large enough to accommodate the proposed development and would also require quite substantial renovation works to bring the property to a standard whereby it could be occupied. The floorspace would clearly not be available within the next three months and therefore has been discounted on the grounds that it is not large enough and is also not expected to be available within a reasonable time period.
- 6.6.18 Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this unit were considered to be suitable and available in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

1 – 7 Cambrian Road

- 6.6.19 Cambrian Road is located in the northern part of the city centre and there is currently a row of vacant unit (Nos 1-7) which could in theory be merged to form one unit. However, even taking into account all four vacant properties this still would not provide the required floorspace and so these have been discounted on the grounds of being too small.
- 6.6.20 Again, even if this unit were considered to be suitable and available in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

Friars Walk Shopping Centre

- 6.6.21 The Friars Walk shopping centre which opened in 2015 has a number of vacant retail units including units U14, U5, MSU05, U19 and U22-28. However, these are all too small to accommodate the proposed operator and so have been discounted.
- 6.6.22 Again, even if this unit were considered to be suitable and available in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

Former Cineworld, Friar's Walk

- 6.6.23 The former Cineworld at Friars Walk closed down during the March 2020 COVID-19 lockdown and has not re-opened since. The vacant unit comprises 2,687 sqm set over two floors and requires a stepped or lift access from the lower ground floor car park at Friars Walk. Therefore, having assessed the suitability of this unit as an alternative to the



application site there is a concern that in terms of customer experience, neither the Friars Walk or the Kingsway Car Park are set up to cater for trolley shoppers.

- 6.6.24 In summary this unit is not suitable and at best would result in a compromised store that would not be able to operate efficiently. Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this unit were considered to be suitable in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

Unit D5, Former Debenham's Store, Friars Walk

- 6.6.25 Unit D5 was previously occupied by Debenhams until it closed in May 2021. The unit comprises 8,430 sqm of accommodation split over three floors as follows:

	Sq M
Basement	2,000
Ground Floor	3,133
First Floor	3,296

- 6.6.26 The Ground Floor space has now been occupied by Home Store, leaving just the basement and first floors, neither of which meet the suitability criteria. Furthermore, having assessed the suitability of this unit as an alternative to the application site there is a concern that in terms of customer experience, neither the Friars Walk or the Kingsway Car Park are set up to cater for trolley shoppers with bulky goods such as garden produce and furniture etc.
- 6.6.27 In summary this unit is not suitable and at best would result in a compromised store that would not be able to operate efficiently. Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this unit were considered to be suitable in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

6.7 District Centres

Commercial Road District Centre

- 6.7.1 There are 19 out of 62 units that are vacant but none of these are large enough (or possible to combine to be large enough) to accommodate the proposed operator. There are no other vacant properties or sites within, or on the edge of, this District Centre.



Handpost District Centre

- 6.7.2 There is one vacant unit in this District Centre which is not large enough, nor does it have the required additional parameters to be considered a viable alternative to the proposal.

6.8 Local Centres

Clytha Park Road Local Centre

- 6.8.1 There is one vacant unit in Clytha Park Road Local Centre; No. 42c (previously used as a bakery). This unit is too small to accommodate the proposed operator. There are no other vacant properties or sites within, or on the edge of, this Local Centre.

St Woolos Local Centre

- 6.8.2 There is one vacant unit in St Woolos Local Centre, the former Church House Public House. This unit is not large enough to accommodate the proposed operator. There are no other vacant properties or sites within, or on the edge of, this Local Centre.

Bassaleg Road Local Centre

- 6.8.3 There is one vacant unit in this District Centre, and it is not large enough, nor does it have the required additional parameters to be considered a viable alternative to the proposal.

Gaer Road Local Centre

- 6.8.4 There are two vacant units in Gaer Road Local Centre and these are too small to accommodate the proposed operator. There are no other vacant properties or sites within, or on the edge of, this Local Centre.

Cardiff Road Local Centre

- 6.8.5 There are no vacant properties or sites within this Local Centre.

6.9 Other

Site of former Sainsbury's, Wyndham Street

- 6.9.1 The former Sainsbury's site on Wyndham Street does not meet the definition of an edge-of-centre location and can therefore be discounted as a sequentially preferable alternative. The site lacks integration with the main shopping area and is poorly connected to the city centre. While technically walkable and 300m from the nearest boundary of the City centre, this journey is neither realistic nor attractive for shoppers using a potential store at this site. The vehicular access is also heavily constrained, only being accessible to south bound traffic on the B4591.



- 6.9.2 As the site has been demolished to slab level it would require a new unit to be constructed which calls into question the viability and availability of the site. Furthermore, the fundamental rationale for the proposed development is to allow an existing vacant retail unit in the applicant's existing ownership and control to be re-let. Even if this site were considered to be suitable in other respects, it would not form a 'real world' alternative to the development proposed and would still leave the existing unit 1 at Harlech Retail Park as vacant and in need of reletting.

6.10 Summary

- 6.10.1 The sequential search has identified no sites which can be considered available, suitable, and viable sequentially preferable alternatives in respect of the proposed development, allowing for flexibility. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.



7.0 ASSESSMENT OF IMPACT

7.1 Introduction

- 7.1.1 This section of the report considers the anticipated diversion of retail trade to the proposed store and the potential trading impact of the proposals.
- 7.1.2 Paragraph 4.3.26 & 4.3.27 of PPW states: “All retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment. For smaller retail planning applications or site allocations, planning authorities will need to determine whether an assessment is necessary, for example when a smaller proposal may have a significant impact on a centre. Requests for retail impact assessments by planning authorities on smaller developments should be proportionate to potential impacts.”
- 7.1.3 In this instance there is no new floorspace proposed. Notwithstanding this, we note in particular criterion ii) of LDP Policy R11 which seeks consideration of the effects of a proposed development on defined retail centres as a consequence of the type or range of goods sold (having regard to any other out of centre developments and outstanding planning permissions). Accordingly, and further to our pre-app enquiry, proportionate retail impact analysis has been carried out and is detailed below.

7.2 Methodology and Evidence Base

- 7.2.1 The approach adopted in this impact assessment reflects national guidance and follows a widely adopted methodological approach to quantitative assessment in terms of assessing future capacity for retail development and quantifying impact.

Step 1 - Establish Catchment Area, Base/Design Years, and Determine What is Being Assessed

- 7.2.2 The catchment area is outlined at Appendix A. Impact is typically assessed up to 5 years from the time of the application being made (base year). A ‘design year’ of 2031 has been adopted for testing impact, by which time trading patterns will have settled down, post opening.

Step 2 - Examine ‘No Development’ Scenario

- 7.2.3 A ‘no development’ scenario i.e., what will happen if no development takes place should be analysed. Moreover, impact assessments should not limit themselves to examining the effects of a proposal on the current position. It is relevant to consider the effect of any known commitments, and to consider the cumulative impact of the proposals.



Step 3 - Assess Turnover and Trade Draw

- 7.2.4 The use of available household telephone survey information to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.
- 7.2.5 The characteristics of the development may give the best indication of where the new development is likely to draw its trade from. Trade is more likely to be drawn from similar competing facilities.
- 7.2.6 The Council's most recent evidence base provided in the Nexus R&LS 2019 (underpinned by a household survey) has been utilised to assess impact on turnover and trade.

Step 4 - Assess Impact on Existing Centres

- 7.2.7 Set out the likely impact of the proposal clearly, along with associated assumptions and reasoning, in respect of quantitative and qualitative issues.
- 7.2.8 It is likely, if a particular facility accounts for the vast majority of expenditure currently generated in a given zone, that a similarly higher proportion of the proposal's turnover will be diverted from that facility.

Step 5 – Consider Consequences of Impact

- 7.2.9 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 7.2.10 The level of trade diversion is based on the generally acknowledged principles that:
- the trading effect on existing floorspace would generally be proportionate to their distance from the proposed new store. Numerous surveys of shopping patterns throughout the UK suggests that customers generally seek to go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
 - stores tend to compete on a 'like with like' basis, such that proposals which have dedicated surface level car parking and provide a similar range of goods and in-store customer facilities, would tend to compete directly for trade.



- 7.2.11 Accordingly, this assessment is fully in accordance with prevailing recommendations and guidance in quantifying retail impact and comprises an orthodox and industry accepted approach to assessing impact. The statistical tables referred to in this section are provided at Appendix B.

7.3 Impact on Existing, Committed or Planned In-centre Investment

- 7.3.1 Key considerations when considering existing, committed or planned in centre investment are identified as including:
- The policy status of the investment (i.e., whether it is outlined in the Development Plan).
 - The progress made towards securing the investment (for example if contracts are established).
 - The extent to which an application is likely to undermine planned development or investments based on the effect on current/forecast turnovers, operator demand and investor confidence.
- 7.3.2 Retail allocations in the catchment area have been considered in detail as part of the sequential investigations undertaken as outlined in Section 6 above. We are not aware of any known notable existing, committed or planned in-centre retail investment proposals in the catchment area upon which the proposed development may give rise to unacceptable impact.

7.4 Impact on Allocated Sites Outside Centres

- 7.4.1 As outlined above retail allocations outside centres have also been considered in detail as part of the sequential investigations undertaken as outlined in Section 6 above. There are no allocated sites outside centres in the catchment area upon which the proposed development may unacceptably impact.

7.5 Cumulative Effects of the Development

- 7.5.1 We are aware of the approved Aldi occupation of 28 East Retail Park and have included that as a commitment in our analysis.

7.6 Impact on Centre Vitality and Viability and In-Centre Turnover and Trade

- 7.6.1 Vitality is reflected in how busy and diverse a retail and commercial centre is at different times and in different parts, and in the attractiveness of the facilities and character which draw in trade. Viability refers to the ability of the centre to attract and retain investment, not only to maintain the fabric, but also to allow for improvement and adaptation to changing needs.



- 7.6.2 It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by large modern food or non-food stores, the effects of new large stores are likely to fall disproportionately on the existing competing stores. Their proportionate impact on local independent retailers, for example, may be less. These accepted patterns suggest that the proposed development will compete predominantly on a like for like basis with other large format, variety store retailers, most notably those nearest to the proposed development with broadly comparable offers.
- 7.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover. The current health of centres is considered (see section 4, above), before conclusions are drawn on the impact on in-centre turnover and trade.
- 7.6.4 In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers growth in available expenditure within the catchment area. A detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is then provided.

Turnover

- 7.6.5 Turnover is set out in detail in at Table 2 of Appendix B. The annual total turnover of the proposed development is assessed to be 9.5m in 2026. This comprises the total turnover of the store, albeit it should be noted that the existing store could be reoccupied without further recourse to the LPA and thus has a notional baseline turnover. Accordingly, Table 2 also sets out the turnover of the previous occupier (Homebase), which would have turned over at £4.9m, and the turnover of a compliant (eg) furniture occupier, which could be expected to turnover a c£10m. Taking these scenarios into consideration, the proposed turnover of a Home Bargains store would be a modest uplift from the Homebase scenario or a reduction from the furniture retailer fallback scenario. Nonetheless, the impact assessment undertaken considers the full turnover of the proposal and thus can be considered very robust.

Expenditure Growth

- 7.6.6 The tables provided in Appendix B draw from the Council's retail evidence base which provides estimates of expenditure per person to the resident population within the PCA to forecast the available retail expenditure generated over the period to 2026 and 2031.

Trading Assessment

- 7.6.7 In light of LDP Policy R11 we provide a trading assessment which considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area.



7.6.8 Table 3 at Appendix B sets out how the introduction of the proposal will affect existing destinations within the surrounding area. The methodological approach employed is widely adopted and accords with guidance set out in TAN4. It involves the following steps:

- Establishing a base year expenditure pattern within the catchment/survey area (i.e. 2026, derived from the RLS Addendum 2023), based on an identification of turnover levels of existing stores or centre derived from monies spent by households in the catchment/survey area.
- Projecting the pattern of expenditure forward to 2031 (the design year, following delivery of the development) for testing impact assuming that each location maintains its current market share of expenditure.
- Taking into account any changes in shopping patterns resulting from relevant retail commitments; and
- Assessing the pattern of trade draw to the proposal.

Trading Effects

7.6.9 Two measures of retail impact are assessed below and on the accompanying Table 3 at Appendix B:

- The change in turnover of centres in the period 2026-2031 following the development of the proposal; and
- The impact of the proposal on the calculated 2031 turnover of centres.

7.6.10 The key changes following the development of the proposal is that there will be a diversion of trade and consequential decreases in turnover achieved at centres and facilities within the catchment within the period to 2031. However, given the proposed development's characteristics it is anticipated to predominantly compete for trade with other large, out of centre destinations which are a) not protected in retail terms and b) typically well equipped to absorb the trading effect.

7.6.11 South-west Newport is particularly well served with retail parks and operators selling similar goods to Home Bargains. This includes the large Tesco Extra store at Harlech Retail Park itself, Limited Assortment Discounter and variety retailers and a large existing Home Bargains store, all within very close proximity to the application site. It is from these facilities that the proposed development is predicted to draw the majority of its trade. As out of centre facilities, none of these facilities derive any protection from planning policy.

7.6.12 It must also be recalled that PCA population and expenditure will grow in the period 2026-2031 (see Tables 1a and 1b at Appendix B) which will help offset or mitigate the impact arising from trade diversion to the proposed store over the same period. It is important to note impact must be weighed in the context of the whole of the centre, not on individual facilities. The proposed development is anticipated to lead to a c.-1.5% impact on the city



centre in 2031; such a degree of impact is very modest, indeed, well within acceptable levels and does not give rise to any undue concern in respect of the centre's trading position.

- 7.6.13 Having regard to the role, function, and vitality and viability of existing centres, the assessed levels of impact are not considered to be significantly adverse. In respect of impact on out of centre facilities, as outlined, these derive no policy protection from the planning system from increased out of centre competition.

7.7 Summary

- 7.7.1 The proposed development will not result in a significant adverse impact on existing, committed or planned in-centre investment. Moreover, the quantitative analysis provided finds no evidence to indicate that the assessed levels of trade diversion will give rise to a likely significant adverse impact on surrounding centres.



8.0 CONCLUSIONS

- 8.1.1 This planning statement has been prepared on behalf The British Land Company PLC to accompany a section 73 planning application for the variation of Condition 8 of planning permission 93/0261/O. The application seeks consent to allow open A1 retail sales with up to 30% of the sales floorspace for the ancillary sale of food and drink which will enable it to be re-occupied by Home Bargains. Home Bargains requires an additional store to serve Newport and thus occupation of the application site premises would be an additional outlet, not a relocation.
- 8.1.2 The proposed development seeks to deliver a new occupier to Harlech Retail Park which would represent positive economic investment in the local area, creating up to 100 new full and part time jobs and providing additional choice to local residents. In bringing forward positive development through the reuse of a retail unit, the proposal will also bring about positive social and environmental benefits to the area.
- 8.1.3 With regards to the retail policy elements of the proposal the pertinent facts are as follows:
- Harlech Retail Park is already a well-established retail site and the principle of open A1 sales from all units save for unit 1 is established. This has not led to a Park made up of High Street operators and the general nature of the Park is not expected to alter significantly as a result of the proposed development.
 - The proposed unit will continue to operate primarily as a non-food goods retail operator. No additional Class A1 shopping floorspace is being sought, albeit greater flexibility in the range of goods that can be sold from the premises is required to enable it to be occupied by Home Bargains.
 - The estimated uplift in turnover compared to the previous occupier is only £4.8m in 2031 which is significantly less than the forecast growth in spending within the PCA (£20m by 2031).
 - If compared to the potential reletting of the unit to an occupier which would not require any additional planning permission, the proposed letting to Home Bargains could result in a reduction in turnover. Using a furniture retailer as an example, the reduction could be £1m in 2031.
 - Taking these scenarios into consideration, the proposed turnover of a Home Bargains store would be a modest uplift from the Homebase scenario or a reduction from the furniture retailer fallback scenario. Nonetheless, the impact assessment undertaken in Section 7 considers the full turnover of the proposal and thus can be considered very robust.
 - There are no sites within or adjoining Newport City centre that are suitable and available to accommodate the proposed development.
 - There are no sites within nearby District/Local Centres that are suitable and available to accommodate the proposed development.



- South-west Newport is particularly well served with retail parks and operators selling similar goods to Home Bargains. This includes the large Tesco Extra store at Harlech Retail Park itself, Limited Assortment Discounter and variety retailers and a large existing Home Bargains store, all within very close proximity to the application site. It is from these facilities that the proposed development is predicted to draw the majority of its trade. As out of centre facilities, none of these facilities derive any protection from planning policy.

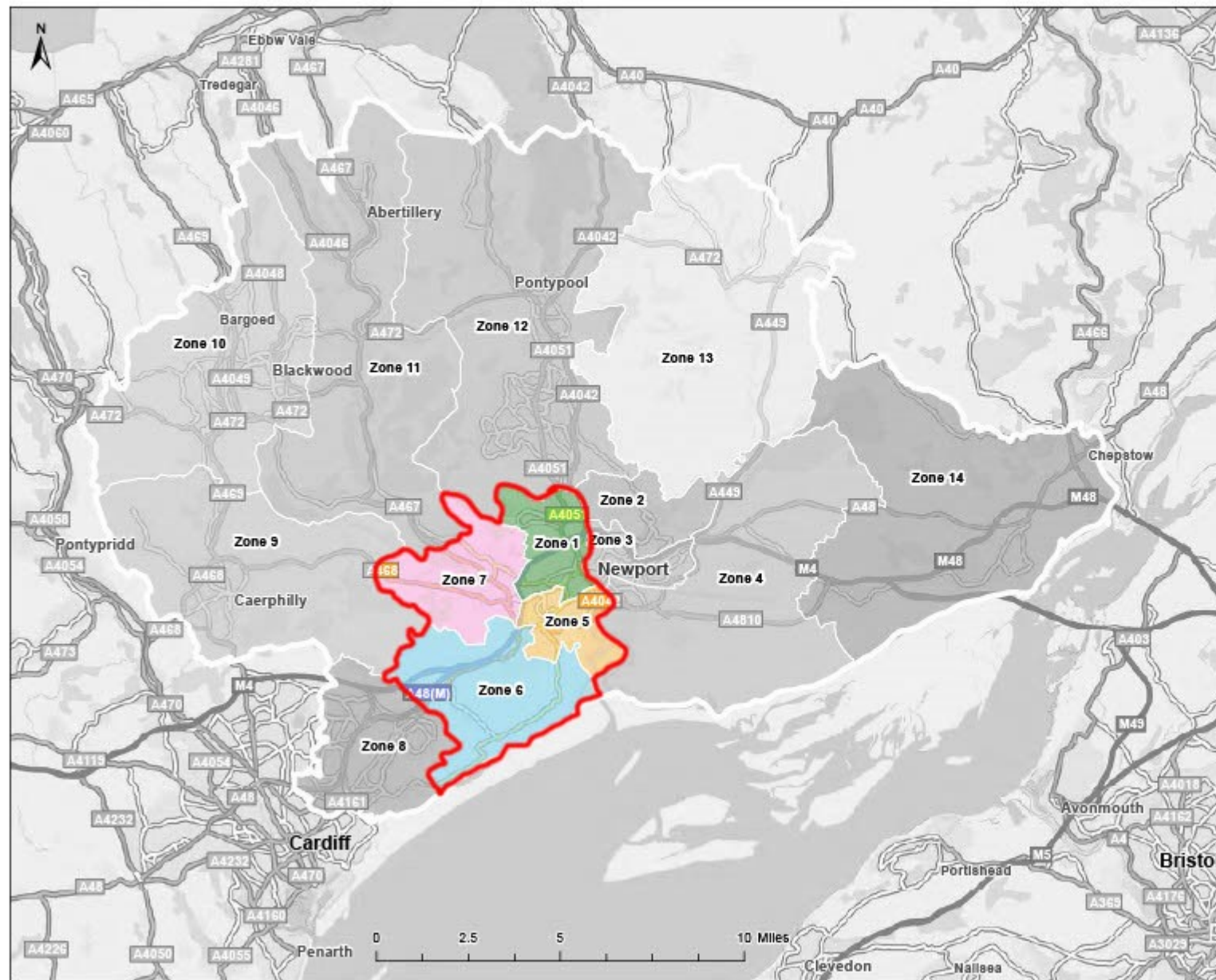
8.1.4 Having regard to the above conclusions, it can be seen that the proposed development would conform to both national and local planning policies. It will meet a number of key national and local policy objectives and will result in economic and sustainability benefits to the local community.



**Appendix A – Plan of Primary
Catchment Area**



Harlech Retail Park - Primary Catchment Area (PCA)



Legend

- Zone 1 - PCA
- Zone 2
- Zone 3
- Zone 4
- Zone 5 - PCA
- Zone 6 - PCA
- Zone 7 - PCA
- Zone 8
- Zone 9
- Zone 10
- Zone 11
- Zone 12
- Zone 13
- Zone 14

 PCA Zone

Appendix B – Statistical Tables



British Land
Unit 1, Harlech Retail Park, Newport

Table 1a: Total convenience expenditure growth in PCA, 2023-2031

	2023	2026	2031	Growth 2023-26		Growth 2026-31	
				£m	%	£m	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]
PCA							
Zone 1	77.5	78.1	80.6	0.6	0.8	2.5	3.2
Zone 5	45.3	45.7	47.1	0.4	0.9	1.4	3.1
Zone 6	15.4	15.5	16.0	0.1	0.6	0.5	3.2
Zone 7	44.3	44.7	46.1	0.4	0.9	1.4	3.1
Total	182.5	184.0	189.8	1.5	0.8	5.8	3.2

Notes

[1],[2],[3] taken from Table 2a of Nexus RLS Addendum 2023

[4] = [2]-[1]

[5]=[3]-[1]

Table 1b: Total comparison expenditure growth in PCA, 2023-2031

	2023	2026	2031	Growth 2023-26		Growth 2026-31	
				£m	%	£m	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]
PCA							
Zone 1	89.3	92.1	107.6	2.8	3.1	15.5	16.8
Zone 5	50.6	52.2	61.0	1.6	3.2	8.8	16.9
Zone 6	21.3	21.9	25.6	0.6	2.8	3.7	16.9
Zone 7	59.7	61.6	71.9	1.9	3.2	10.3	16.7
Total	220.9	227.8	266.1	6.9	3.1	38.3	16.8

Notes

[1],[2],[3] taken from Table 8 of Nexus RLS Addendum 2023

[4] = [2]-[1]

[5]=[4]/[1]*100

2021 prices

British Land
Unit 1, Harlech Retail Park, Newport

Table 2: Benchmark Turnover comparison

	Gross Floorspace sqm	Net Floorspace sqm	Sales density £/sqm	Turnover (£m) 2026	Turnover (£m) 2031
	[1]	[2]	[3]	[4]	[5]
<i>Existing occupier</i>					
Unit 1 (Homebase)	2,608	2,086	2,355	4.9	5.5
<i>Fallback occupier (Furniture)</i>	2,608	2,086	4,842	10.1	11.3
<i>Proposed occupier</i>					
Unit 1 (Home Bargains)=	2,608	2,347			
<i>Non-food</i>		1,643	4,066	6.7	7.5
<i>Food</i>		704	4,066	2.9	2.9
Total				9.5	10.3
Difference compared to Homebase +/-				4.6	4.8
Difference compared to fallback +/-				- 0.6	- 1.0

Notes

[1] app drawings

[2] derived from app drawings and information provided by TJ Morris

[2] proposed occupier: 30% food and drink floorspace

[3] Sales densities derived from Mintel RR (Homebase and representative furniture retailer) and information provided by TJ Morris and GlobalData (Home Bargains), at 2021 price base

[4] [2]x[3]/1,000,000

[5] turnover growth to 2031 based on assumed f/s efficiency increase (0.0% conv and 2.3% comp p/a) (EXRPBN 22 Figs 4a&b (Mar 2025))

2021 prices

British Land
Unit 1, Harlech Retail Park, Newport

Table 3: Trading effects of the proposed development, 2031

	Turnover 2026		Total Turnover 2026	Turnover 2031		Total Turnover 2031	Trade Draw to Development				Commitment	Residual Turnover 2031	Impact			
	Convenience	Comparison		Convenience	Comparison		Convenience		Comparison		Aldi, 28 East R.P		Change 2026-31		2031 Impact	
	£m	£m	£m	£m	£m	£m	%	£m	%	£m	£m	£m	%	£m	%	
	[1]	[2]	[3]	[4]	[5]	[6]	[7]				[8]	[9]	[10]	[11]	[12]	[13]
In centre																
Newport City Centre	2.9	145.9	148.8	3.0	170.4	173.4					0.80	172.6	23.80	16.0	-0.8	-0.5
Iceland, Commercial Street	9.0	0.0	9.0	9.3	0.0	9.3					0.39	8.9	-0.10	-1.1	-0.4	-4.2
M&S Foodhall, Friars Walk SC	2.0	0.0	2.0	2.1	0.0	2.1					0.09	2.0	-0.03	-1.3	-0.1	-4.3
Sainsbury's, Sovereign Arcade, John Frost Square	1.4	0.0	1.4	1.5	0.0	1.5					0.02	1.4	0.03	1.8	-0.02	-1.4
Tesco Express, Cambrian Road	0.2	0.0	0.2	0.2	0.0	0.2					0.01	0.2	-0.004	-1.8	-0.01	-4.8
Total	15.5	145.9	161.4	16.0	170.4	186.4	13	0.4	15	1.1	1.31	183.6	22.20	13.8	-2.8	-1.5
Out of centre																
Tesco Extra, Harlech Retail Park	24.3	3.5	27.8	25.1	4.1	29.2	33.0	0.9	16	1.2	2.02	25.0	-2.80	-10.1	-4.2	-14.3
Harlech Retail Park	0.0	56.7	56.7	0.0	66.2	66.2			2.0	0.1		66.1	9.38	16.5	-0.1	-0.2
Morrisons, Azelea Road, Rogerstone	24.5	0.0	24.5	25.3	0.0	25.3					0.40	24.9	0.38	1.6	-0.4	-1.6
Asda, Pencarn Way, Coedkernew, Duffryn	38.6	12.1	50.7	39.8	14.1	53.9	2.0	0.06			2.04	51.8	1.16	2.3	-2.1	-3.9
Sainsbury's, Albany Street	48.2	21.2	69.4	49.7	24.8	74.5	2.0	0.1			1.90	72.6	3.15	4.5	-2.0	-2.6
28 East Retail Park, Docks Way	0.0	10.2	10.2	0.0	11.9	11.9			20	1.5		10.4	0.22	2.1	-1.5	-12.6
Mendalgief R.P (Maesglas R.P), Docks Way	0.0	63.8	63.8	0.0	74.5	74.5			13	1.0		73.6	9.75	15.3	-1.0	-1.3
Lidl, Usk Way, Newport	1.9	0.0	1.9	2.0	0.0	2.0				0.0	0.39	1.6	-0.33	-17.2	-0.4	-19.7
Home Bargains, Newport West R.P*	4.0	8.7	12.6	4.1	10.1	14.2	25.0	0.7	25.0	1.9		11.6	-1.00	-7.9	-2.6	-18.2
Lidl, Cardiff Rd, Maesglas*	9.8	1.8	11.61	10.1	2.1	12.2	10.0	0.3			0.98	11.0	-0.65	-5.6	-1.3	-10.4
Screwfix, Maesglas Ind Estate	0.0	1.5	1.5	0.0	1.7	1.7						1.7	0.25	16.8	0.0	0.0
Aldi, Albany Street*	11.2	3.4	14.6	11.5	4.0	15.5	3.0	0.1				15.4	0.84	5.8	-0.1	-0.6
Aldi, 28 East RP*				17.7	1.7	19.4	7.0	0.2	4.0	0.3		18.9			-0.5	-2.6
Other											7.13	-7.1				
Inflow							5.0	0.1	5.0	0.4						
							100	2.9	100	7.5	17.7					

Notes

[1] [2] taken from 2023 t/o App A tables 4 and 25 of Nexus RLS Addendum 2023 grown to 2026 in line with tables 1a/b

[3]=[1]+[2]

[4]&[5] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2031 in line with tables 1a&b

[6]=[4]+[5]

[7] CS estimate based upon retail offer, existing shopping patterns and location / retail offer of competing stores.

[8] trade diversion estimates derived from PRS for pp ref: 19/0111, at 2021 prices

[9]=[6]-[7]-[8]

[10]=[9]-[3]

[11]=[9]-[3]-[3]*100

[12]=[9]-[6]

[13]=[9]-[6]-[6]*100

* t/o are benchmark estimates derived from pp ref:18/0787 (Lidl), ref: 22/0438 (Aldi, Albany St), ref: 24/0067 (Aldi, 28 East RP)

2021 prices