

February 2026



PLANNING STATEMENT

Full Planning Application for the proposed change of use of a vacant retail unit (Class A1 Shops) to a betting shop (Sui Generis use class) and advertisement consent and minor works at 40- 41 Commercial St, Newport, NP20 1HP.

On behalf of

Done Brothers
(Cash Betting) Ltd

Prepared by

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Appendices

- Betfred Market Research Findings Report
- Betfred Brochure
- Marketing Evidence

1. Introduction

- 1.1 This Planning Statement (PS) has been prepared by ID Planning on behalf of Done Brothers (Cash Betting) Ltd to support a Full Planning Application for the proposed change of use, advertisement and minor works to 40-41 Commercial St, Newport, NP20 1HP from a vacant retail unit (Class A1 Shops) to a betting shop (Sui Generis use class).
- 1.2 Betfred already operate a bookmaker at 66 Commercial St, Newport, Gwent, NP20 1LQ. The proposal would see the closure of this betting shop with the opening of 40-41 Commercial St. therefore; the proposal would not result in any additional bookmakers in the town centre boundary.
- 1.3 Aside from this report, the application is supported by the following documents and plans:
 - Site Drawings
 - Betfred Brochure
 - Market Research Report
 - Marketing Letter

2. Site Description & Planning History

Site Description

- 2.1 The proposed site lies on the corner of Commercial Street and Llanarth Street, and within the Newport Town Centre Conservation Area. The site is allocated in the City Centre Shopping Area and Primary Shopping Frontage Area (R2). The unit is the ground floor of a three-story building. The site is not a listed building but is situated across from 42 Commercial Street which is Grade II listed (reference 23109).
- 2.2 The unit is currently vacant following the closure of Clarks (Retail, Class 1A) over 10 years ago.
- 2.3 The site is mapped as not at risk of flooding on the Natural Resources Wales Flood Map.



Figure 1 - view of the unit from Commercial St.



Figure 2 - view of the unit from Llanarth St.

Relevant Planning History

- 2.4 The Newport City Council online database has been consulted to identify the planning history at the site.

Application reference	Description of Development	Approved & Date
21/0954	Change of use of upper floors to create an 11 bedroom house in multiple occupation (Sui Generis use), the creation of external amenity space and the installation of an additional door facing Llanarth Street to allow access to the bin/bike storage.	Refused 24 th November 2022.
17/0928	Installation of 4No. internally illuminated fascia signs and 2No. internally illuminated projecting signs.	Granted with conditions 1 st December 2017.
17/0927	Change of use from retail (A1) to coffee shop (A1/A3) and installation of roof plant.	Granted with conditions 1 st December 2017.
98/0032	Replacement of part of shopfront.	Granted 26 th March 1998.
98/0015	Erection of 2 internally illuminated shop signs.	Granted 27 th February 1998.
89/0722	Erection and display of 2 illuminated fascia signs and 2 illuminated projecting box signs.	Granted 8 th December 1989.

3. Proposed Development

Introduction

- 3.1 The following section provides a description of the proposed development. This text should be read in conjunction with the plans and technical reports submitted in support of the application.
- 3.2 The proposal seeks the change of use, advertisement and minor works of 40-41 Commercial St, NP20 1HP from a vacant retail unit (Class A1) to a betting shop (Sui Generis).
- 3.3 Betfred already operate a successful bookmakers in Newport Centre, a short distance away from the proposed site. This application seeks to facilitate the relocation of Betfred's existing bookmaker at 66 Commercial St, NP20 1LQ to 40-41 Commercial St.
- 3.4 Both units are in the designated town centre shopping area, the existing unit being located within the secondary shopping frontage area (R3) and the proposed unit is within the Newport Town Centre conservation area, within the primary shopping frontage area and also within the City Centre retail/leisure redevelopment area.
- 3.5 The relocation of Betfred's existing bookmaker business bring a large vacant unit back into active use on Commercial St and Llanarth St, which supports the economic growth principles in local and national policy.

4 Relevant Planning Policy

Statutory Development Plan

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

Newport Local Plan 2011-2026 (Adopted 2015)

- 4.3 These are the relevant policies from the Newport Local Plan:
 - **Policy SP1** – Sustainability
 - **Policy SP9** – Conservation of the Natural, Historic and Built Environment
 - **Policy SP18** – Urban Regeneration
 - **Policy SP19** – Assessment of Retail Need
 - **Policy GP2** – General Amenity
 - **Policy GP6** – Quality of Design
 - **Policy CE7** – Conservation Areas
 - **Policy R1** – City Centre Schemes
 - **Policy R2** – Primary Shopping Frontage

Planning Policy Wales Edition 12 (February 2024)

- 4.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 4.5 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic duty.
- 4.6 The following paragraphs within the PPW are considered relevant to the proposed change of use.
- 4.7 Paragraph 3.9 – The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.
- 4.8 Paragraph 4.3.3 – The Planning System must sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness.
- 4.9 Paragraph 4.3.6 – Retail and commercial centres will experience growth and decline, and development plans should identify these changing retail pressures and opportunities and devise appropriate responses to them.
- 4.10 Paragraph 4.3.30 – Although retailing (A1) uses should underpin retail and commercial centres, it is only one of the factors which contribute towards their vibrancy.
- 4.11 Paragraph 4.3.32 – Policies should encourage a diversity of uses in centres.

- 4.12 Paragraph 4.3.34 – Leisure and entertainment uses can benefit retail and commercial centres, and with adequate attention to safeguarding amenities can contribute to a successful evening economy. In addition to general diversity of uses, mixed use developments, which combine retailing with entertainment, restaurants and, where appropriate, residential in a comprehensive and planned way should also be encouraged where appropriate to promote lively centres during both the day and the evening.
- 4.13 Paragraph 4.3.36 – Planning authorities should assess retail and commercial centre performance and the effectiveness of development plan policies by monitoring their health. They should use the strategy in their development plan to manage change and take action where necessary to address this. Where economic decline is impacting on a retail and commercial centre, emphasis on retaining A1 uses in premises either in primary or secondary areas, which have been vacant for a period of time, may undermine a centre's viability and vitality. In such circumstances planning authorities should consider how **non-A1 uses may play a greater role to increasing diversity and reducing vacancy levels.**

5 Planning Assessment

- 5.1 Betfred already operate a successful bookmaker business, this is at 66 Commercial St, Newport, Gwent, NP20 1LQ. Betfred are proposing an expansion of their existing bookmaker business within the town centre and would not result in any additional bookmakers' business being added to the centre.
- 5.2 The proposed expansion of Betfred's existing business in the centre supports the economy and provides additional employment which in turn accords with PPW principles on supporting economic growth whilst increasing diversity and reducing long term vacancy levels.
- 5.3 As it stands, the vacant unit does not positively contribute to enhancing the vitality and viability of the town centre. The proposed change of use would bring a long-term vacant unit back into active use with an open shopfront and changing window display to support the vitality and viability of this part of Newport Town Centre. This is in accordance with Local Development Policies GP2, SP9, SP18 and SP19, as the proposal helps to conserve and protect the future of a vacant unit within the Newport Centre, providing a mixed-use development to ensure to vitality and viability.
- 5.4 The application site is c.15m on the Commercial Street frontage and c. 13m on the Llanarth Street frontage. Therefore, this proposal is in accordance with Policy R2 (i). Regarding Policy R2 (ii), the unit is not adjacent to another non-retail unit on both sides and therefore satisfies this requirement. R2 (iii) requires 80% of the total length of retail frontage to be maintained in retail use. Whilst other units along Commercial Street and Llanarth Street are in A1 uses, the shop frontage length accounts for 42% of this stretch of Commercial Street and 54% of Llanarth Street frontage. Although the proposal could be deemed not to comply with policy, this would be an inaccurate judgement as the size of the unit in comparison to the relatively short stretch of retail frontage does act to skew this figure. This has been noted in the officer report **17/0927|CHANGE OF USE FROM RETAIL (A1) TO COFFEE SHOP (A1/A3) AND INSTALLATION OF ROOF PLANT**. "It is worth noting that the Commercial Road frontage includes 6 units, all of which are in A1 use and the Llanarth Street frontage include 3 units within the primary frontage area, all of which are in A1 use." Therefore, this proposal can be deemed acceptable.
- 5.5 Please see drawings for compliance with Policy R2 (v).
- 5.6 In relation to (iv), (vi) and (vii), the proposal occupies a corner unit as a Sui Generis use class with opening times 08:00-22:00 Monday to Saturday and 09:00-22:00 Sunday/Bank Holiday. Due to the long-term (10 years+) vacancy of the unit and current marketing running from 2015, the PPW provides guidance stating that material considerations apply when determining the outcome of this application. Authorities should apply a more flexible approach. This proposal would increase footfall to the area, similar to retail units of the centre, increasing the vitality and viability of the centre. The proposal would reduce vacancy levels and increase mixed-use.
- 5.7 The supporting text to 17/0927 states "Being on such a prominent corner, it is considered that a use which is shown to enhance footfall and the vitality and viability of the centre would be hugely beneficial to the city centre as a whole and, by the logic applied in the supporting text to policy R2, would help to link Commercial Street and Friars Walk by leading footfall around on to adjoining frontages".
- 5.8 The proposal also accords with National Policy set out in the PPW by continuing to provide a bookmaker business and local employment, contributes to the vibrancy of

Newport in accordance with Paragraph 4.3.30 and strengthens the diversity of services on offer within Newport Centre in accordance with Paragraph 4.3.32.

- 5.9 There is a high level of level of vacancies on Commercial Street within the conservation area. This is detrimental to the character, appearance and long-term security of the conservation area. The proposed Betfred would increase footfall to the area whilst simultaneously occupying a long-term vacant unit. Furthermore, this would increase the mixed-uses of the town centre and increase amenity levels. Being on a fairly prominent corner, it is considered that a use which is shown to enhance footfall and the vitality and viability of the centre would be hugely beneficial to the city centre as a whole and, by the logic applied in the supporting text to policy R2, would help to link Commercial Street and Friars Walk by leading footfall around on to adjoining frontages. This means that the proposal is compliant with Local Policies SP1, SP9, GP2, CE7 and R1.
- 5.10 The design will be of good quality and compliant with local policy. Please see the attached drawings for more detail.
- 5.11 Taking the above into account, the proposed change of use accords with national and local planning policy, represents sustainable development and can be supported.

6 Conclusion

- 6.1 This Planning Statement has been prepared on behalf of Done Brothers (Cash Betting) Ltd to support a Full Planning Application for the proposed change of use of a vacant retail unit (Class A1 Shops) to a betting shop (Sui Generis use class) and advertisement consent and minor works at 40- 41 Commercial St, Newport NP20 1HP.
- 6.2 Betfred already operate an existing unit at 66 Commercial Street. Upon opening of the proposed betting shop, the existing unit would close, opening up a new unit to be marketed for retail.
- 6.3 The proposal will retain Betfred's existing bookmaker business in Newport and contributes to the economic development objectives, the evening economy and vibrancy and vitality of the Town Centre as supported by the PPW and Local Plan Policies.
- 6.4 In view of the above, it is considered the scheme satisfies both national and local policy and represents a suitable use for the units. The proposals address all the relevant material considerations and, in this respect, we would invite the Council to assess the application and offer its support for the proposals.