NEWPORT LOCAL DEVELOPMENT PLAN 2011 - 2026

DISTRICT CENTRES
BACKGROUND PAPER

JUNE 2013
1. **Introduction**

1.1 This background paper is an update of the version published in April 2012, accompanying the Deposit Local Development Plan (LDP) (April 2012). It has been updated following the consideration of the representations submitted on the Deposit LDP. The focus of the update is Newport Retail Park, which raised a number of issues at the Deposit consultation stage. Newport Retail Park is discussed at page 46.

1.2 District centres form an important part of Newport’s retail hierarchy. They provide a range of shops and services for its immediate area and are usually accessible by a means of transport and/or are within a short walking distance of the surrounding population. Planning Policy Wales requires Local Planning Authorities to develop through their community strategies and development plans a clear strategy and policies for retail development which seek to achieve vital, attractive and viable centres.

1.3 This Background Paper sets out to review the status of the 12 District Centres designated under Policy R7 of the Adopted Newport Unitary Development Plan 1996 – 2011 (the UDP) and, where appropriate, to propose a redefinition of boundaries or reclassification of designation. The findings of the assessment will feed directly in to the Newport Local Development Plan 2011 – 2026 (the LDP) and help shape policies relating to District Centres.

1.4 More specifically the purpose of the background paper is to:

- Assess the boundaries of the existing District Centres defined in the UDP and make amendments where necessary;
- Assess the appropriateness of the District Centre designations and determine whether a Local Centre designation would be more appropriate;
- Define a District Centre boundary for Newport Retail Park District Centre;
- Highlight policy considerations to be incorporated into Local Development Plan District Centre policies; and
- Review the Colliers International Retail Study – July 2010 for policy recommendations relevant to the district centres.
- Update the policy response to Newport Retail Park taking account of the representations received on the Deposit LDP – April 2012 and advice from Colliers Internationals during February 2013.
2 Policy Context

Planning Policy Wales (Ed 5 Nov 2012) – Chapter 10 Planning for Retail and Town Centres.

2.1 The Welsh Government’s objectives for retailing and town centres are to:
- secure accessible, efficient, competitive and innovative retail provision for all the communities of Wales, in both urban and rural areas;
- promote established town, district, local and village centres as the most appropriate locations for retailing, leisure and for other functions complimentary to it;
- enhance the vitality, attractiveness and viability of town, district, local and village centres; and to
- promote access to these centres by public transport, walking and cycling.

2.2 Wherever possible this provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Town, district, local and village centres are the best locations for such provision. A complementary mix of uses should also sustain and enhance the vitality, attractiveness and viability of those centres as well as contributing to a reduction of travel demand.

2.3 Development plans should establish the existing hierarchy of centre, which will help determine an appropriate response to the requirement of a need assessment and the sequential approach to site selection.

2.4 Local Planning Authorities should develop through their community strategies and development plans a clear strategy and policies for retail development which seek to achieve vital, attractive and viable centres.

2.5 Development plans should also identify changing pressures and opportunities and devise appropriate responses to them. In some instances it may be necessary to take pro-active steps to identify town and city centre locations for expansion. In others it may be necessary to identify measures to reinvigorate centres or to manage decline in the relative importance of a centre as other centres expand. Dealing with change may mean redefining the boundaries of centres or identifying acceptable changes of use.

2.6 For clarity, Planning Policy Wales defines the terms usually referred to when assessing the successfulness of a town, district or local centre:
- Vitality - is reflected in how busy a centre is at different times and in different parts.
- Attractiveness in the facilities and character which draws in trade.
- Viability – the ability of the centre to attract investment, not only to maintain the fabric but also to allow for improvement and adaption to changing needs.

TAN (Wales) 4 – Nov 1996 - Retailing and Town Centres

2.7 TAN 4 defines a District Centre as being: groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants.
2.8 It defines a local centre as being: a small grouping, usually comprising a newsagent, general store, sub-post office and occasionally a pharmacy, hairdresser and other small shops of a local nature.
3 Assessment of District Centres

3.1 A survey was undertaken of each of the twelve District Centres designated in the Newport Unitary Development Plan. This involved visiting each District Centre and noting the occupier and use of each property. The information has been collated and forms the basis of the conclusions reached in this paper.

3.2 Survey work took place between the months of November 2009 and March 2010. The surveys are a snapshot in time, and no doubt some uses may have changed since the survey took place. These may include for example, the occupation of a previously vacant unit or vice versa, and the separation of one large unit into two smaller units, etc. Where changes are known and are considered to be of significance, they will be highlighted in the discussion for each of the separate District Centres.

3.3 Information inputted includes:

- Name of commercial business
- Property address
- Activity type – e.g. food and drink, convenience, comparison, etc
- Brief description of business – e.g. pub, restaurant, hairdressers, etc
- Use class
- Measurement of shop frontage in metres – this helps give a more accurate assessment of impact, as a business may only occupy one unit but this may account for a large proportion of the total shop frontage in the District Centre.
- Any other comments – e.g. if unit is vacant, who the previous occupier was.

3.4 In addition a workshop with Development Management staff was arranged to gain officers’ input on recent application and appeal decisions, and experiences with determining planning applications within the existing policy framework.

3.5 Each unit has been classified by use class to give an indication of type and range of uses.

Class A1 – Shops of all types including superstores and retail warehouses, also including hairdressers, sandwich bars, travel agents.

Class A2 – Financial and professional services to visiting members of the public, including banks, building societies, estate agents and betting offices.

Class A3 – Food and drink, including restaurants, pubs, wine bars and take-aways.

Class C3 – Dwelling houses.

Class D1 – Non-residential institutions including religious buildings, public halls, museums and medical services.

Class D2 – Assembly and leisure including cinemas, bingo halls, casinos and indoor sports.
Sui Generis – Many uses do not fall within any class and are therefore described as Sui Generis, i.e. a class of their own. For example, theatres, launderettes, amusement centres, car showrooms, petrol filling stations and car hire offices are among uses which are specifically excluded from any of the defined classes.

3.6 Each use class has been plotted on a plan of the District Centre to help identify any patterns that are occurring, for example the clustering of vacant units or A3 premises. A plan illustrating this information is included as part of the discussion for each of the District Centres.
4 Colliers International – Retail Study and Capacity Assessment (July 2010)

4.1 Colliers International was instructed by Newport City Council and Newport Unlimited in March 2010 to prepare the Retail Study and Capacity Assessment of the city. The consultants brief set out two main objectives:-
- to provide evidence for the LDP and inform policies and proposals in the plan; and
- to assist in assessing future retail planning applications and proposals.

4.2 With specific reference to the District Centres, the brief listed the following study outputs:
- Calculation of likely expenditure available to the District Centres as a whole to 2026 (excluding Newport Retail Park) disaggregated by convenience goods and comparison goods;
- Calculation of likely expenditure available to Newport Retail Park (only) to 2026 disaggregated by convenience goods and comparison goods.

Findings of the Retail Study – District Centres

4.3 The Retail Study found that the 12 district centres (including Newport Retail Park) contain almost 40,000 sq m net of occupied retail floorspace, although some 21,600 sq m net (55%) is at Newport Retail Park District Centre.

4.4 Excluding Newport Retail Park the biggest District Centre in terms of estimated retail goods floorspace is Commercial Road with 5,713 sq m of the net total. Five other District Centres have in excess of 1,000 sq m net, these being Beechwood, Caerleon Road, Maindee, Malpas Road and Corporation Road.

4.5 In terms of comparison goods shopping, Colliers found that Commercial Road, Maindee and Malpas Road are the largest, whilst for convenience goods Commercial Road is by a considerable margin the biggest centre. The Asda superstore is located within the defined Commercial Road District Centre and is the reason for its prominence.

4.6 The study assesses future convenience and comparison needs for the District Centres. In summary, it concludes that there is no great need for extra floorspace up to the study period of 2026 for comparison goods in the District Centres. Similarly, the existing level of convenience floorspace is more than sufficient in numerical terms. In overall terms, Newport is served well for comparison and convenience goods within its District Centres.

4.7 Colliers consider that the District Centres are well distributed throughout the city with each serving its immediate area for mainly day to day shopping and key local services. Colliers summarise the key features of each District Centre, in Table 4.1, including catchment population and a broad assessment of centre vitality and viability.
### Table 4.1 – Colliers International Assessment of the Newport’s District Centres

<table>
<thead>
<tr>
<th>Vitality and Viability</th>
<th>District Centre</th>
<th>Socio-Demographics of Local Population</th>
<th>Layout and Configuration</th>
<th>Key Retailers/ Anchors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Good Vitality &amp; Viability</td>
<td>Maindee</td>
<td>Mainly least deprived</td>
<td>Linear, vehicular street</td>
<td>Boots, Somerfield, Peacocks</td>
</tr>
<tr>
<td></td>
<td>Caerleon Road</td>
<td>Least deprived</td>
<td>Linear, vehicular street</td>
<td>Boots</td>
</tr>
<tr>
<td>Average Vitality and Viability</td>
<td>Corporation Road</td>
<td>Mainly most deprived</td>
<td>Linear, vehicular street</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Risca Road (The Handpost)</td>
<td>Mainly most deprived</td>
<td>Linear, vehicular street</td>
<td>Cost Cutter</td>
</tr>
<tr>
<td></td>
<td>Caerleon</td>
<td>Least deprived</td>
<td>Vehicular street, dual node (High St and Station Rd)</td>
<td>Spar</td>
</tr>
<tr>
<td></td>
<td>Malpas Road</td>
<td>Mainly most deprived</td>
<td>Vehicular street, including Discovery Park retail warehouses</td>
<td>Aldi, Wickes</td>
</tr>
<tr>
<td></td>
<td>Beechwood</td>
<td>Mainly least deprived</td>
<td>Linear, vehicular street</td>
<td>Spar</td>
</tr>
<tr>
<td>Poor Vitality &amp; Viability</td>
<td>Commercial Road</td>
<td>Most deprived</td>
<td>Linear, vehicular street</td>
<td>Asda</td>
</tr>
<tr>
<td></td>
<td>Bettws</td>
<td>Most deprived</td>
<td>Purpose built</td>
<td>Spar</td>
</tr>
<tr>
<td></td>
<td>Ringland</td>
<td>Most deprived</td>
<td>Purpose built</td>
<td>Cost Cutter</td>
</tr>
<tr>
<td></td>
<td>Clarence Place</td>
<td>Mainly most deprived</td>
<td>Linear, vehicular street</td>
<td>Iceland</td>
</tr>
</tbody>
</table>

Source: Colliers International Retail Study and Capacity Assessment – July 2010

4.8 Colliers conclude that there appears to be a strong correlation between local area deprivation and centre vitality and viability. Maindee and Caerleon Road are the most vital and viable and are located in areas with low levels of deprivation, whereas Commercial Road, Clarence Place, Bettws and Ringland are situated in areas characterised by high levels of deprivation. Bettws and Ringland are purpose built centres and are in particular need of new investment. They attract a lot of walk-in business, but due to their location little or no passing trade.

**Conclusions of Colliers Retail Study and Capacity Assessment – July 2010**

4.9 The Study concludes that the definition of District Centres should be reviewed to ensure those defined as such more closely match the TAN 4 (Nov 1996) definition. Colliers consider that the centres at Clarence Place, Bettws and Ringland all be considered for reclassification as Local Centres.

4.10 Colliers also recommend that District Centres should not be allowed to evolve into centres which will compete with the City Centre to the detriment of its vitality and viability. This is of particular relevance to Newport Retail Park District Centre.
5 Beechwood District Centre

5.1 Beechwood District Centre is situated on the eastern side of the city along Chepstow Road. The surrounding uses are predominantly residential, and the entrance to Beechwood Park is positioned opposite the District Centre. The Centre is linear in form, with shops running along one side of the road. The main road is a busy route in and out of the city. The Unitary Development Plan District Centre designation runs for approximately 370 metres and contains 35 units. All the units front onto Chepstow Road, except for 3 small units positioned on the junction of Somerton Road and Chepstow Road.

Range of Uses

5.2 There are a range of uses represented in Beechwood District Centre; with A1 retail uses accounting for 40% of the shop frontage area. These include a number of convenience shops such as a Spar, post office, bakers, fruit & veg shop, and a couple of hairdressers. There are a selection of comparison goods shops on offer including a bed shop, chemist and carpet shop as well as more specialist shops, such as a cycle shop and piano shop.

5.3 In addition, there are number of other complimentary uses, such as estate agents, dry cleaners and dress alterations. A2 uses account for 8% of the shop frontage area. A3 uses, including a coffee shop and a number of takeaways account for 19% of the District Centre shop frontage. Sui generis uses account for a further 19% of shop frontage. This is a result of 2 large units accommodated by a building equipment hire shop and a car rental depot.

5.4 Vacancy levels are considered to be low, with only 2 vacant units, accounting for 5% of the shop front area.
5.5 The Tai Chi Society accommodates the first unit in the District Centre (unit 348). This is a large stone building that historically was home to the telephone exchange. The unit is of a different scale and design to the other retail units, and has no open frontage that you would associate with a retail function. Given the use and design of the former telephone exchange building and its position as an end unit, it is considered that it does not form part of the retail District Centre. It is therefore proposed to remove the building from the District Centre.

**Recommendation**

5.6 Remove unit 348 Chepstow Road from the District Centre. Plan 5.2 illustrates the proposed District Centre boundary to be included in the Local Development Plan.

Plan 5.1 - Beechwood District Centre – Shop units by Use Class

Source: Survey – 12/11/09
Plan 5.2 - Beechwood District Centre – Proposed Boundary
Bettws District Centre

5.7 Bettws District Centre is situated in the middle of Bettws, a predominantly large Council estate on the north western limits of the borough. The shopping centre is a purpose built retail centre, designed to serve the residential area around it. It is a square courtyard 1960s design, with the retail units fronting onto a central courtyard area. The District Centre is made up of 19 units.

Range of Uses

5.8 There is a strong A1 retail presence at Bettws, with A1 uses accounting for 46% of the shop front area. This is largely made up of a number of convenience goods shops including a Spar, Post Office, bakery, butchers and newsagent. There is a limited range of comparison goods on offer, with only 3 units offering goods such a card shop and dvds. While there are only 2 A2 units in the District Centre, one is a large unit compared to the majority of the retail units and is occupied by Newport City Homes. A2 uses therefore account for 25% of the shop front area. There are only 2 units occupied by A3 uses, one of which is a coffee shop/café and the other a chip shop. There is only one vacant unit in Bettws District Centre.

5.9 The local Police Station is also situated in the District Centre, which within the Use Class Order is classified as a sui generis use. It is a relatively large unit and therefore accounts for 11% of the frontage area, although it does not have the open frontage usually associated with a shop front.

Percentage of Shop Frontage by Use Class

5.10 The Colliers Retail Study recommends that Bettws be reclassified as a Local Centre reflecting the range and type of goods on offer and its purpose built design to serve the local community around it. The centre is positioned in the centre of Bettws, with its well defined community. It does not benefit from the through traffic the other District Centres positioned on a main thoroughfare would. With this in mind, Colliers International concludes that the centre does not meet the definition of a District Centre set out in TAN 4.
**Recommendation**

5.11 The Colliers International Retail Study together with a recent survey indicate that Bettws shopping precinct offers a selection of local convenience goods and principally serves its local community. It is proposed that Bettws District Centre is reclassified as a Local Centre in the Local Development Plan and the District Centre boundary removed. It is not proposed to define boundaries for Local Centres on the proposals map of the Local Development Plan.

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**Plan 6.1 - Bettws District Centre – Shop unit by Use Class**

Source: Survey 03/03/10
Plan 6.2 - Bettws District Centre – Proposed Boundary Reclassification
6 Caerleon District Centre

6.1 Caerleon is situated at the northern limits of the borough’s boundary. Caerleon itself is a fairly self contained part of Newport, but also attracts a lot of visitors to facilities such as the University campus and tourist attractions including the Roman Amphitheatre. There are two District Centres within Caerleon, located at either end of High Street.

High Street/Cross Street

6.2 The first centre is at the southern end of High Street at the junction of High Street and Cross Street. It is a compact centre comprising of 12 units. There are 5 units in A1 use (4 retail and 1 hairdresser). They account for 31% of the shop front area.

6.3 There are 4 units in A3 uses, two restaurants and two pubs. These account for 45% of the shop front area, however this can in part be attributed to The Bull Inn, which accommodates a corner position and therefore has a double frontage.

6.4 Further south along High Street, outside of the District Centre boundary is The Ffwrwm. This is a parade of six shops selling a range of goods including a beauty shop, goldsmith and furniture. There is also a café and barbers and one vacant unit. As well as providing for the local community, the row of shops and range of retail goods on offer also function as a tourist attraction, selling independently locally made goods, more often associated as gift items.

6.5 The Ffwrwm shops run down a side alley, accessed off The High Street. The range of uses in The Ffwrwm is consistent with a District Centre allocation. However, the Ffwrwm is separate from the main High Street and does not have any shop frontages facing onto the main road. 27 High Street and Caerleon House (both listed buildings) form a gap between the first retail unit in the District Centre and the entrance to The Ffwrwm. As such, an extension to the boundary would involve the inclusion of non-retail or
District Centre uses. To avoid stretching the District Centre boundary too far and possibly diluting its policy impact, it is considered more beneficial to retain the existing boundary and keep the focus on the units fronting into the main High Street.

Plan 7.1 - Caerleon District Centre (High Street) – Shop unit by Use Class
Source: Survey – 02/03/10
Plan 7.2 - Caerleon District Centre (High Street) – Proposed Boundary
**Goldcroft Common**

6.6 The second District Centre in Caerleon is located at the end of High Street, near Goldcroft Common. This is also a compact centre consisting of 15 units. Thirteen units are situated on the western side of High Street and go around the corner on to Station Road. Two units (a kitchen show room and Angel pub) are on the opposite side of High Street.

6.7 There are a mixture of uses present within the District Centre, including a newsagent, Spar, gift shop, opticians and beauty salon. A3 uses account for the largest percentage of shop front area, which can be attributed to 3 large pubs and a couple of smaller café/take away units.
Plan 7.3 - Caerleon District Centre (Goldcroft Common) – Shop unit by Use Class

Source: Survey – 02/03/10
Plan 7.4 - Caerleon District Centre (Goldcroft Common) – Proposed Boundary

**Recommendations**

6.8 There are no proposed changes to the Caerleon District Centre boundaries.
7 Caerleon Road District Centre

7.1 Caerleon Road District Centre is located on the eastern side of the city, along a busy main road connecting Caerleon to the city centre. It is approximately 330m in length and has approximately 45 different units. The District Centre currently starts at 131 Caerleon Road and runs to 209 Caerleon Road. A number of other retail/commercial uses are present in units 111 – 129 Caerleon Rd. These are outside the District Centre boundary.

Range of Uses

7.2 At the time of surveying, there was a strong A1 presence to the District Centre, with 60% of the shop front area in A1 use. This included a variety of local convenience uses including butchers, post office, bakers, green grocers, newsagent and services such as hairdressers. A range of comparison goods are also on offer in the form of a sport shop, florist, opticians, chemist, card shop and interior furnishings. These are complimented by a number of A2 uses such as a launderette, bank and betting shop. A3 uses account for 19% of the shop front area, involving a mixture of restaurants and take aways, as well as The Victorian Inn. This is a large pub situated on the junction of Caerleon Road and York Road.

7.3 There are 4 vacant units, 3 of which are located at the southern end of the District Centre. Two of these are off the main road on Constance Street, and do not benefit from a primary frontage location.

7.4 Properties 111 – 129 Caerleon Road are also predominantly in commercial/retail use and adjoin the southern edge of the District Centre. Seven of the properties are in non-residential uses including a newsagent, hairdressers, bookshop, sandwich shop and take away. The other 3 units are currently used as residential properties.

7.5 Consideration has been given to extending the District Centre to include units 111 – 129 Caerleon Road. However, given that the southern end of the District Centre is where the 3 of the 4 vacant units are, it is feared that extending the boundary further south to include an additional 10 units, that include some residential properties, may weaken the role of the District Centre boundary and associated policies.
7.6 There are two changes proposed to tighten the District Centre boundary closer to the rear of The Victoria Inn pub (179 Caerleon Road) and the Spar (211 Caerleon Road), to more closely reflect the retail unit rather than the curtilage.

Recommendation

7.7 Amend boundary to the rear of The Victoria Inn Pub (179 Caerleon Road) and the Spar (211 Caerleon Road).
Plan 8.2 - Caerleon Road District Centre – Proposed Boundary
8 Clarence Place

8.1 Clarence Place District Centre is located to the east of the River Usk, just after Town Bridge. It is in close proximity to the city centre, with Newport’s central shopping area located within walking distance. The District Centre is made up of 27 units, which are positioned on both sides of the main road. The northern side is however, different in character and design to the southern side, with several large 1960/70s units. The southern side consists of a row of terraced properties and is more traditional in character.

Range of Uses

8.2 The retail function of Clarence Place District Centre has reduced overtime. At the time of surveying, A1 uses accounted for 18% of the shop front area, which is largely due to a large unit occupied by Iceland. The frozen food shop still acts as an anchor store for the District Centre, but there are few other A1 uses to support it. A3 uses dominate the District Centre, accounting for 35% of the shop front area. This percentage was higher until recently, but has reduced as a result of TJ’s, a large night club now becoming vacant. Consequently, 24% of the shop front area is vacant in the District Centre.

8.3 The dominance of A3 and non-retail uses has resulted in Clarence Place no longer functioning as a District Centre. The limited shopping facilities on offer may be a reflection of its proximity to the city centre. Given the lack of retail presence in Clarence Place, the Colliers International Retail Study 2010, concludes that Clarence Place no longer meets the definition of a District Centre as set out in TAN 4 and that it be reclassified as a Local Centre.

![Percentage of Shop Frontage by Use Class](image)

8.4 Given Clarence Place’s prominent and strategic location on the outskirts of the city centre, the Council would not wish for the removal of the District Centre designation to result in a further reduction in the quality of the street scene and amenity of the area. There are a couple of prominent listed buildings situated on Clarence Place, as well as major
regeneration/residential developments under construction near by. While it is proposed to remove the District Centre designation, consideration should be given to the policy creation or SPG that seek to safeguard and enhance shop frontage appearance to protect townscape quality.

**Recommendation**

8.5 The Clarence Place District Centre boundary be removed and reclassified as a Local Centre in the Local Development Plan. It is not proposed to define boundaries for Local Centres on the proposals map of the Local Development Plan.

8.6 Consideration should also be given to appropriate policy coverage to protect and enhance the shop frontages and townscape quality.

8.7 Local Centre policy to emphasise the importance of retaining local retail uses and residential amenity.

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**Plan 9.1 - Clarence Place District Centre – Shop Units by Use Class**

Source: Survey – 11/11/09
Plan 9.2 - Clarence Place District Centre – Proposed Centre Reclassification
9  **Commercial Road**

9.1 Commercial Road District Centre runs along a main vehicular road, leading in and out of the City Centre. The centre is one of the largest District Centres in Newport, with approximately 75 units. Asda supermarket is within the District Centre, on the former Cattle Market site.

### Range of Uses

9.2 Excluding Asda from the shop front figures, A1 uses account for 35% of the shop front area. Retail provision is made up of convenience, comparison and hairdressers. Convenience goods are largely made up of food stores, including speciality/ethnic food goods. Asda supermarket is also situated in the District Centre on the old Cattle Market site. There are also a variety of comparison units ranging from chemist, florists, electrical shop, pound shop and furniture shops.

9.3 There are a range of food outlets along Commercial Road. These are predominantly made up of hot food take aways. A3 uses account for 12% of the shop front area.

![Percentage of Shop Front Area by Use Class](image)

9.4 Residential units account for a relatively high percentage of the shop front area for a District Centre, at 21%. There are a few individual units mixed in with the other retail units along Commercial Road, however most of the 21% is made up of 2 separate residential blocks. Units 1 – 13 Drovers Mews is situated at the northern end of Commercial Road and 1 – 12 Dolphin Court is situated in a more central location, next to the former Kwik Save site.

9.5 The Commercial Road District Centre is also covered by the Pillgwenlly Regeneration Framework (adopted May 2009). The Framework covers a wider area than the District Centre boundary, however phase 1 concentrates on the northern section of Commercial Road. For this reason, there are no changes proposed to the northern limits of the District Centre boundary.
9.6 The former Cattle Market site was redeveloped in 2009 for an Asda Supermarket, and is contained within the District Centre boundary. The most eastern part of the former Cattle Market site is undeveloped, but has planning permission for a hotel. The hotel site relates more to Lower Dock Street and one of the important considerations in its redevelopment is the relationship to the Lower Dock Street frontage. The site does not form part of the functioning of the Commercial Road District Centre. For these reasons it is proposed to remove the hotel application site from the District Centre boundary. The site was included in the Deposit Plan (April 2012) as a Regeneration site under Policy EM2(v). However, following a comprehensive review of the Employment and Regeneration allocations for the Revised Deposit LDP through the Employment Land Review (Roger Tym – May 2013), the site has been removed from the Plan due to its small size.

9.7 The existing boundary currently stops after unit 143 Commercial Road, which runs through a block of 4 units. To create a more logical boundary, it is proposed to extend the boundary to include up to unit 140 Commercial Road. This is the end of the block and adjoins an area of public space.

**Recommendations**

9.8 Amend the District Centre boundary to exclude the hotel application site, to allow for a more flexible approach to redevelopment options.

9.9 Extend the southern boundary to include up to unit 140 Commercial Road.
Plan 10.1 - Commercial Road District Centre – Shop Unit by Use Class

Source: Survey – 10/03/10
Plan 10.2 - Commercial Road District Centre – Proposed
10 Corporation Road

10.1 Corporation Road District Centre is located on the eastern side of the city, along a busy main road providing access in and out of the city centre. It is linear in form, with traditional styled units running along both sides of the main road. The Centre is split in two by Wharf Road and George Street Bridge, which forms a prominent physical barrier to visitors to the District Centre.

Range of Uses

10.2 A1 uses account for 42% of the shop front area, 11% in A2 uses and 17% in A3 uses. There is a mixture of convenience and comparison goods on offer. Comparison goods include tool hire, interior designers, gift shop, electrical shop and a stationary shop.

10.3 Residential units account for a relatively high percentage of the shop frontage area, at 15%. These are located in the larger stretch of shops running along Corporation Road, to the south of George Street Bridge/Wharf Road junction. There are five residential units in total, positioned on either of this section of the District Centre. It is proposed to remove these units from the District Centre boundary.

![Percentage of Shop Front Area by Use Class](image)

10.4 The Wharf Road/George Street Bridge junction has essentially created two sub-centres. One provides shops for the residents living to the west of Wharf Road and a second centre for the residents living to the east of Wharf Road.

10.5 The units to the west of Wharf Road form a compact centre offering a mixture of comparison, convenience, service and take away goods (units 163 – 177 & 170 – 186). There are 3 vacant units in this section of the District Centre, but this situation could change. This section of the District Centre should be retained ensure a continuation of retail provision for residents living on the western side of Wharf Road.

10.6 The small block of units to the east of Wharf Road on the northern side of Corporation Road (199 – 209) feel divorced from the longer stretch of units.
on the opposite side of the road. It is considered that it would be beneficial to the centre to consolidate the District Centre boundary and remove these units from the boundary. This is also the view of development control colleagues.

**Recommendations**

10.7 Remove units 199 – 209 from the district centre boundary.

10.8 Remove the residential units at 206 – 212 Corporation Road and 274 Corporation Road from the district centre.

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**Plan 11.1 - Corporation Road District Centre – Shop unit by Use Class**

*Source: Survey – 26/11/09*
Plan 11.2 - Corporation Road District Centre – Proposed Boundary
11 Handpost District Centre

11.1 The Hand Post District Centre is located on the western side of the city, along Risca Road. The centre contains 28 units, 26 of which run along one side of Risca Road. The Handpost pub and Slow Boat Chinese take away are situated on the opposite side of the road, near the junction of Bassaleg Road and Risca Road.

Range of Uses

11.2 54% of the shop frontage area is occupied by A1 uses. These include a range of shops including a Costcutters, chemist, florist, optometrists, off-licence and hairdressers. The retail function is complimented by a number of financial and professional services such as a financial advisor, bank and library. These A2 uses account for 16% of the shop front area.

11.3 There are 8 units occupied by A3 uses, including The Hand Post Pub. Excluding the pub, the remaining 7 units account for 25% of the shop front area. The potential impact of additional A3 uses will therefore be a significant consideration should new planning applications be submitted, particularly along stretches of Risca Road where there is already a cluster of A3 uses.

![Handpost District Centre Percentage of Shop Front Area by Use Class](chart)

11.4 The existing boundary as defined in the Newport Unitary Development Plan excludes land formerly used for public toilets. This now forms part of the Hand Post pub’s curtilage and should therefore be included in the District Centre for completeness.

Recommendation

11.5 Amend the boundary to include the former public toilets land as it now forms part of the Hand Post Pub’s curtilage.
Plan 12.1 - Handpost District Centre – Shop unit by Use Class
Source: Survey – 11/11/09
12 Maindee District Centre

12.1 Maindee District Centre is situated on the eastern side of the city, along Chepstow Road. It is approximately 350 metres in length and includes 79 units. The Centre is linear in form with shops on both sides of the road fronting onto the Main Road. There are also a small number of units located on side street and to the rear of Chepstow Road included in the District Centre boundary. The centre benefits from a lot of through traffic, being positioned on a main route in and out of the City Centre.

Range of uses

12.2 Maindee District Centre is considered to be a vibrant centre with a good mix of shops and uses on offer. A1 uses account for 38% of the shop front area contained within the district boundary. This is made up of a mixture of convenience goods including a Somerfield supermarket, Post Office, butcher, bakery, fruit and veg shop and newsagent. There is a good selection of comparison goods on offer, with Maindee District Centre having more comparison goods on offer than any other District Centre in Newport. Comparison goods on offer include menswear shop, mobile phone shop, chemist, bathroom shop and a musical electrical shop. These include branches of national chains, such as Peacocks and Boots the chemist.

12.3 There is a mixture of uses present with A2 uses accounting for 10% of the shop area and A3 uses 22%.

12.4 The shop front area figures are skewed slightly by a number of residential properties at the back of Chepstow Road on Livingstone Place. These account for 11 units within the District Centre. Re-drawing the District Centre to exclude these units is considered to be a more appropriate boundary for the District Centre. Adjoining the residential properties is a scrap yard, which fronts onto Probert Place. A scrap yard use is not
considered to form part of this District Centre and it is therefore proposed to exclude it from the District Centre.

12.5 The northern boundary includes a property that has been converted back to residential use and adjoins residential properties outside of the District Centre (unit 167). It is proposed to re-draw the district centre boundary to exclude no. 167 Chepstow Road.

12.6 A car park to serve the shopping area is located at the southern end of the District Centre. Adjoining the car park and within the existing District Centre boundary is a multi-use games area. It is proposed to remove this from the District Centre to protect its use as a play facility for the local area.

12.7 Brandon Tool Hire is located at the southern end of the district centre. The shop unit is however, located away from Chepstow Road along the junction of Glebe Street and Wharf Road. It is considered that this use and the unit do not form part of the district centre and it is therefore proposed to remove this section from the district centre boundary.

**Recommendations**

12.8 Remove the garage unit and residential units to the rear of Chepstow Road, and 39 – 46 Livingstone Place and 3 & 7 Speke Street.

12.9 Remove the scrap yard on Probert Place from the District Centre boundary.

12.10 Remove 167 Chepstow Road from the District Centre as it has been converted back to a residential property.

12.11 Remove the multi-use games area situated next to the car park from the District Centre boundary.

12.12 Remove the builder’s yard unit from the District Centre boundary.
Plan 13.1 - Maindee District Centre – Shop Unit by Use Class
Source: Survey – 17/11/09
Plan 13.2 - Maindee District Centre – Proposed Boundary
13 Malpas District Centre

13.1 Malpas Road District Centre is located at the southern end of Malpas Road, close to the Old Green roundabout. The existing centre is made up of two distinctive parts. The most southern section includes two large retail units on the Discovery Retail Park. The northern section is on Malpas Road and comprises two linear rows of shops running along each side of the main road. This more traditional northern section of the district centre contains 34 units.

Range of Uses

13.2 There is a high percentage of shop front area in A1 use, which is largely contributed to the inclusion of 2 large warehouse units on the Discovery Retail Park – Wilkes and Aldi. The more traditional part of the centre also has a variety of A1 uses available, with 11 of the 34 units in retail/A1 uses. These include a number of local convenience shops, such as newsagent and service such as hairdressers, as well as more specialist comparison goods shops such as bridal shops and a kitchen and bathroom showroom.

13.3 There is a small cluster of residential units on the southern end of the western side of the Malpas Road. This situation should be monitored and reviewed as part of the first Local Development Plan review.

13.4 Given the two distinctive parts to the existing District Centre boundary, it is proposed to remove the southern larger stores from the defined boundary. The units are not of a size or style that would usually be associated with a District Centre and are physically separate from the traditional element of the centre, with their own access and car parking arrangements.
Recommendation

13.5 Remove the two large units to the south of Malpas Road from the District Centre.
Plan 14.2 - Malpas District Centre – Proposed Boundary
14 **Ringland**

14.1 Ringland District Centre is located on the eastern edge of the city in a large Council estate. It is a purpose built rectangular shopping centre, with shopping units fronting onto a central courtyard. Residential properties are located above the shops in purpose built flats, overlooking the central courtyard below. There are 18 units contained within the existing District Centre boundary, including The Friendship pub. This, however, is situated in a corner position, fronting onto Ringland Circle as opposed to the District Centre courtyard. The District Centre adjoins other community uses, including a library, playing fields, school and green spaces.

**Range of Uses**

14.2 There is a strong retail presence in the Ringland District Centre, with 45% of the shop front area occupied by A1 uses. Of this, the retail goods on offer are dominated by convenience goods shops, such as bakers, fruit and veg, butchers, post office, cost cutters and newsagent. There is only one shop selling comparison goods. The percentage of shop frontage covered by A3 uses includes The Friendship pub, and therefore skews the figures slightly. There is only one other A3 use in the centre – a fish and chip shop.

14.3 Newport City Homes occupy a large unit in the corner of the shopping precinct (units 8 – 11); however, at present this is positioned outside of the District Centre boundary.

14.4 Colliers Retail Study has concluded that the Ringland Centre is performing poorly in terms of vitality and viability and is in need of new investment. The centre attracts a lot of walk-in business, but due to its location attracts little or no passing trade. Given this and the range of retail goods on offer consisting primarily of local convenience goods, the retail study concludes that the centre does not accord with the TAN 4 definition of a District Centre. It concludes that the centre should be reclassified as a Local Centre.
Recommendation

14.5 Ringland District Centre be reclassified as a Local Centre in the Local Development Plan. It is not proposed to define boundaries for Local Centres on the proposals map of the Local Development Plan.

Newport Local Development Plan – Deposit Plan Representations

14.6 One representation was received as a result of the Deposit Plan consultation exercise, which took place between April and June 2012. The representation objects to the reclassification of Ringland from a District Centre to a Local Centre. No changes are proposed to be made to the plan in relation to this objection.
Plan 15.2 - Ringland District Centre – Proposed Centre Reclassification
15 **Newport Retail Park**

15.1 The Adopted Newport Unitary Development Plan identifies Newport Retail Park as a District Centre to function as a local shopping centre for the Eastern Expansion Area, where major development is to take place. Given that Newport Retail Park is a large out-of-centre purpose built retail park that competes directly with the city centre, the policy considerations for the retail park have been considered separately to the other district centres.

**Composition of the Retail Park**

15.2 Newport Retail Park is approximately triangular in shape, and falls into distinct sections. The main retail part is formed by Tesco and 21 other retail units, with Central Avenue separating Tesco from the other units. To the east, across Seven Stiles Avenue, the pattern is different, with Cineworld cinema, the former Megabowl bowling alley, the Peugeot car showrooms, a vacant site, and Matalan as the only retailer in this section. Also at the southern end of this section, close to the access to the retail park off Queensway Meadows and distinct from the retail core, there are 3 food outlets – McDonalds, Pizza Hut and Frankie and Benny’s, together with a Blockbuster video and a hairdressers. Between these units and Tesco, there are two car showrooms, one now vacant.

15.3 The 21 retail units in the north-east section of the retail park are occupied by national chains. These are in the main occupied by non-bulky comparison goods stores including Sport Direct, Next, Outfit, Asda Living, New Look, Clarks, Peacocks, Clintons, Boots, SCS and Iceland.

**Colliers Retail Study & Capacity Assessment (July 2010)**

15.4 A significant consideration in planning policy terms for the Newport Retail Park is for it to fulfil an appropriate function as a District Centre, while not developing in such a way as to undermine further the viability and vitality of the city centre. At 33,246 sq m, the gross floorspace of the Retail Park is equivalent to about 73% of the city centre (45,504 sq m)^1^, and clearly it presents a challenge to the City Centre. Newport Retail Park is also far larger than any of the other 11 District Centres identified in the UDP, and in fact has almost as much floorspace as the rest of them put together.

15.5 Newport Retail Park has therefore developed to such an extent that it has more than sufficient floorspace and types of traders present to fulfil a role as a District Centre. The Colliers study is also clear in stating that it has more than sufficient capacity, for both convenience and comparison goods, to cater for the planned growth in the Eastern Expansion Area of the city. It notes that further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a District Centre and thereby changing its position in the retail hierarchy. Further development of the retail park would pose a threat to the viability and vitality of the city centre, restrictions on further development are appropriate.

15.6 The Colliers study does not identify any quantitative need for additional large out of centre convenience goods stores in the city as a whole.

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^1^ Source: Newport Retail Study and Capacity Assessment, Colliers International, July 2010
15.7 With regards to comparison goods, the retail study recommends that to avoid Newport Retail Park competing directly with the City Centre, the scale of comparison goods should be restricted primarily to the sale of bulky goods. It notes that it is important to ensure that the centre does not evolve into a high street comparison goods centre which undermines the continued vitality and viability of the City Centre. It suggests that control over the range of goods which can be sold is controlled through the use of planning conditions and a minimum unit size established to avoid an increase in smaller units more usually associated with a city centre location.

Environmental Improvements

15.8 The East Newport Development Framework Plan Supplementary Planning Guidance\(^2\) states that the centre needs to be accessible by all modes of transport and should provide for a wider range of land uses including community uses. The objective is to develop the District Centre as a mixed use hub for the wider area including the Eastern Expansion Area and to create an attractive destination (para 4.32 – EEA Framework).

15.9 The relationship between the EEA and the Newport Retail Park District Centre is important. The creation and enhancement of existing links between the District Centre and the EEA are necessary to improve the functional connection between the District Centre and the strategic residential site it will serve. Where new development comes forward, the design and layout of the proposals should be such as to facilitate and enhance movement between the EEA and the residential development.

Newport Local Development Plan – Deposit Plan April 2012

15.10 The Deposit LDP sets out a separate policy approach to Newport Retail Park to the other District Centres taking into account the policy recommendations of the Colliers Retail Study and Capacity Assessment (July 2010) findings. The policy covered the following:
   - no additional retail sales floorspace to be permitted;
   - minimum unit size to avoid an increase in smaller sized units that alter the function of the District Centre role and threaten the vitality and viability of the City Centre;
   - control of the range of goods which can be sold to ensure that the centre does not evolve into a high street comparison goods centre;
   - provision of convenient and attractive links to the Eastern Expansion Area;
   - issues relating to highway capacity park provision and alternative modes of transportation.

Newport Retail Park District Centre Boundary

15.11 The Unitary Development Plan does not outline a District Centre boundary for Newport Retail Park; however, it is recommended that the Local Development Plan should do so. In order to protect the viability and vitality of the City Centre and to ensure that retail investment is concentrated there, it is proposed that the Newport Retail Park boundary should be restricted to the core retail element.

15.12 A plan outlining the District Centre boundary for the Newport Retail Park is provided overleaf.

Newport Local Development Plan – Deposit April 2012 – Consultation Representations

15.13 The Deposit LDP was consulted on during April – June 2012. As a result a number of representations were received on Policies R6 and R7 of the plan, which relate to Newport Retail Park District Centre. The basis of the representations were:
- Consider the retail park to have expanded beyond what is appropriate for a District Centre.
- Consider the policy approach of seeking to restrict additional sales floorspace to be fundamentally unsound and that accordingly the District Centre status should be removed and all facilities considered as being out of centre;
- there is a contradiction between Policy R6 & R7;
- Policy R6 & R7 is contrary to national guidance;
- Proposed reduction in area of the defined Newport Retail Park boundary excludes a number of town centres uses;
- Policy R6 & R7 should be deleted and policy R5 – District Centres should be relied on.

Newport Retail Plan Representations – Colliers Response

15.14 Colliers International Ltd was asked by the Council to consider the representations received and offer advice on an appropriate policy response. Colliers’ conclusions are set out in a letter dated 6th February 2013. A copy of the letter is attached at Appendix 1.

15.15 Colliers International set out the national policy context in which Newport Retail Park should be considered. Planning Policy Wales (PPW) makes clear that retail development should be directed to centres and in accordance with the sequential approach, town centres are different to district and local centres. PPW also confirms that development should be at an appropriate scale to the centre in which it is situated.

15.16 In considering the representations on the Deposit LDP Colliers raised the following key points:

(i) The definition of ‘town centres’ in TAN 4 includes ‘district centres’ as distinct from ‘town centres’ which are separately defined. It is important to explain the definition of Newport Retail Park so as to accurately place it in the hierarchy for the application of the sequential test.

(ii) Approach of Newport City Council in seeking to define a boundary for Newport Retail Park and to define its strategic role is appropriate.

(iii) Considered appropriate for the LDP to define a specific policy role for Newport Retail Park District Centre in order to provide control over its function and potential impact on Newport City Centre.

(iv) Is appropriate to define a boundary which excludes some of the facilities exiting in the area so as to ensure the defined centre more properly reflects the reason for the designation of the centre (i.e. local shopping needs) and to limit the potential for competition with the higher tier ‘town centre’. The effect of this boundary definition will be that retail development in the areas outside of the district
centre will be subject to the sequential test, will have to demonstrate need and, potentially, accept conditions restricting the range of goods sold.

(v) Policy wording of Deposit LDP Policy R6 is ambiguous.

(vi) Sufficient control over Newport Retail Park District Centre should be capable of being achieved in a single policy.

(vii) The LDP should contain a definition of different types of floorspace such as gross, net and retail sales.

(viii) Policy R6, the prohibition on growth in retail floorspace at the District Centre appears to prevent the application of the sequential approach and therefore does not accord with national policy.

(ix) Strategic objective for the District Centre designation should be stated so that any new development can be tested against that objective.

(x) In order to restrict the overall level of convenience store provision, a limitation on the number of convenience stores over 929 sq m retail sales floorspace within the centre should be introduced. This would permit smaller stores serving a local function, but would prevent the addition of new superstores.

(xi) Colliers disagree with the approach taken towards comparison goods in the Deposit LDP as it would restrict the provision of local shops and could be used to justify the provision of larger stores which could have a greater impact on the city centre. A better approach would be to require that new retail development which either increases the net retail floorspace of the centre, or involves the provision of comparison floorspace in excess of 500 sq m retail sales area, is subject to the sequential test and impact assessment to test its impact on the city centre and other District Centres. The effect of this approach would be to make larger scale redevelopment in the centre, or its extension, subject to the same tests as out of centre development — justified on the basis of the unusual justification for the District Centre’s designation. Any development on the edge of the district centre would also be subject to the same policies as out of centre development. This approach would also enable the sequential approach to be applied in a controlled manner.

(xii) Recommend that the District Centre be restricted primarily to the sale of bulky goods.

Newport Local Development Plan – Revised Deposit Plan, June 2013

15.17 Following the consultation on the Deposit LDP and the consideration of the representations received, the Council wishes to make a number of amendments to the LDP. Due to the nature of the proposed changes, the Council has made the decision not to run a ‘Focussed Changes’ consultation. Instead, the Council will amend the LDP accordingly and publish a Revised Deposit version.
15.18 As part of the Revised Deposit, policies R6 & R7 are proposed to be merged into one policy to take into consideration the representations received on the Deposit and the advice from Colliers International. The revised approach is considered to facilitate retail development of an appropriate scale to provide local shopping facilities to serve the Eastern Expansion Area, while trying to avoid impact on the vitality and viability of the City Centre.

15.19 The revised policy and supporting text is set out in Appendix 2.
Plan 16.1 – Newport Retail Park – Units by Use Class
Plan 16.2 – Newport Retail Park – Proposed District Centre Boundary
### 16 Summary of Recommendations

16.1 A summary of all the policy and boundary recommendations contained within this paper are noted below.

<table>
<thead>
<tr>
<th>District Centre</th>
<th>Policy or Boundary Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beechwood District Centre</td>
<td>Remove Unit 348 Chepstow Road from the District Centre boundary.</td>
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<tr>
<td>Bettws District Centre</td>
<td>Reclassify Bettws District Centre as a Local Centre in the Local Development Plan.</td>
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<tr>
<td>Caerleon District Centre</td>
<td>There are no proposed changes to Caerleon District Centres.</td>
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<tr>
<td>Caerleon Road District Centre</td>
<td>Tighten the boundary to the rear of The Victoria Inn and Spar.</td>
</tr>
<tr>
<td>Clarence Place District Centre</td>
<td>Clarence Place District Centre designation be removed and thereby reclassified as a Local Centre in the Local Development Plan. Given the prominent location of Clarence Place appropriate policy coverage should be included in the Local Development Plan to protect and enhance the shop frontages and townscape quality in this major approach to the City Centre.</td>
</tr>
<tr>
<td>Commercial Road District Centre</td>
<td>Remove the hotel application site on part of the former Cattle Market site from the District Centre. Extend the southern boundary to include up to unit 140 Commercial Road.</td>
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<tr>
<td>Corporation Road District Centre</td>
<td>Remove units 199 – 209 Corporation Road from the District Centre boundary. Remove the residential units at 206 – 212 Corporation Road and 274 Corporation Road from the District Centre.</td>
</tr>
<tr>
<td>Handpost District Centre</td>
<td>Amend the boundary to include the former public toilets land.</td>
</tr>
<tr>
<td>Maindee District Centre</td>
<td>Remove the garage unit and residential units to the rear of Chepstow Road, 39 – 46 Livingstone Place, and 3 &amp; 7 Speke Street. Remove the scrap yard on Probert Place from the District Centre boundary. Remove 167 Chepstow Road from the District Centre as it has been converted back to a residential property. Remove the multi-use games area situated next to the car park from the District Centre boundary. Remove the builder’s yard from the District Centre boundary.</td>
</tr>
<tr>
<td>Malpas District Centre</td>
<td>Remove the two large retail units to the south of Malpas Road from the District Centre boundary.</td>
</tr>
<tr>
<td>Ringland District Centre</td>
<td>Ringland District Centre be reclassified as a Local Centre in the Local Development Plan.</td>
</tr>
<tr>
<td>Newport Retail Park</td>
<td>The boundary shown in Plan 16.2 be included in the Local Development Plan as the District Centre boundary for Newport Retail Park. A policy specific to Newport Retail Park District Centre be included in the Local Development Plan, covering the following: Newport Retail Park is a District Centre within the definition of TAN 4, to provide local shopping facilities for</td>
</tr>
</tbody>
</table>
the Eastern Expansion Area.

- There will be no more than one large convenience store with a floorspace in excess of 929 sq m retail sales floorspace in the district centre.
- Class A1 retail development which increases the total net floorspace in the District Centre by more than 500 sq m will be required to demonstrate that they accord with the strategic objective of providing local services for the Eastern Expansion Area, comply with the sequential test and do not have a harmful impact on other centres;
- The type or range of goods sold does not threaten the vitality or viability of the City Centre;
- Introduction of other Class ‘A’ services and related community facilities will be supported where they serve the Eastern Expansion Area and will be subject to control to prevent their change of use to Class A1 use;
- Development should enhance links to the Eastern Expansion Area;
- Surrounding highway and transportation network has capacity to serve the development and access and serving arrangements can be accommodated;
- Proposal is fully accessible on foot, bicycle and by public transport;
- Car parking requirements can be met.
Appendix 1 – Newport Local Development Plan – Newport Retail Park Representations

NEWPORT LOCAL DEVELOPMENT PLAN – NEWPORT RETAIL PARK REPRESENTATIONS

Further to instructions received on 10 October 2012, I have reviewed the draft policies in the Deposit Draft Local Development Plan and the representation made thereto. I am pleased to set out my conclusions and recommendations below in light of the findings of the Colliers International Retail Study and Capacity Assessment 2010 National Planning Policies for Retail Development in Wales.

For purposes of record my response is set out in the following sections:

i) Background
ii) The recommendations of the Colliers Study;
iii) The Policies of the Newport Local Development Plan 2011 – 2026;
iv) National Policy for Retail Development in Wales;
v) An examination of the representations to the draft Plan;
vi) Our conclusions on the appropriate response to these representations.

I turn now to consider your questions under the headings set out above.

1. Background

Newport Retail Park is an agglomeration of what were once out of centre shopping facilities but which were designated as a “district centre” in the adopted Newport Unitary Development Plan in 2006. The UDP includes the retail park within Policy R7, which lists the district centres, but it does not define its extent either in policy or on the Proposals Map. The written justification for the policy (paragraph 6.28A) sets out the reason for its designation. It is described as acting as a
local shopping centre for the Eastern Expansion Area, although it is acknowledged that some remodelling of the development will be desirable in order to fulfil this role.

In a series of planning decisions made thereafter, including a planning appeal, Officers have accepted that the extent of the district centre included the Tesco store together with the Horse shoe of retail warehouses adjacent, and those properties lying to the rear fronting Seven Stiles Avenue (see Plan 16.1 of the District Centres Background Paper April 2012).

The floorspace for the City Centre, the Newport Retail Park District Centre and the other district centres is set out in the Colliers International report of 2010 (Appendix 4B (i)) and is as follows:

<table>
<thead>
<tr>
<th></th>
<th>GROSS (SQ M)</th>
<th>NET (SQ M)</th>
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<tbody>
<tr>
<td>City Centre</td>
<td>45,504</td>
<td>29,577</td>
</tr>
<tr>
<td>Newport Retail Park</td>
<td>27,319</td>
<td>21,600</td>
</tr>
</tbody>
</table>

By way of comparison, the Newport Retail Park equates to 73% of the net retail floorspace in the City Centre. On its own it also equates to 55% of net retail floorspace in all 12 district centres and is almost four times larger than the next largest district centre, which is itself almost twice the size of the third largest.

2. Colliers International Retail Study and Capacity Assessment 2010

The Colliers International report assessed the capacity for new retail floorspace in Newport and set out recommendations for appropriate policies in the light of its findings. These recommendations expressly included a policy approach for the Newport Retail Park district centre (paragraphs 8.34 – 8.38 inclusive).

The report concluded that control will need to be maintained over the range of comparison goods sold in the district centres to ensure they do not evolve in a way which competes with the City centre to the detriment of its vitality and viability. The appropriate use of conditions restricting the range of goods to be sold, unit sizes and total floorspace for each unit is recommended.

Particular recommendations are made in respect of the Newport Retail Park district centre due to the potential for it to compete directly with the City Centre. Consequently it was recommended that the sale of comparison goods be restricted primarily to bulky goods so that it does not evolve into a high street comparison goods centre which undermines the continued vitality and viability of the City Centre.

Furthermore, there is no significant requirement for additional food shopping in order to service the Eastern Expansion Area. Reference is made to the proposal for new development of the Megabowl site situated within the defined district centre. Consequently the development of a superstore on this site would be a matter of commercial competition and not one of planning policy. Nevertheless if the Megabowl proposals were implemented we do not consider the same
approach would justify further superstores within the centre as this would change its function and character, expanding it beyond that which is appropriate for a district centre.

We are aware that subsequent to completion of our report, planning permission for the development of a food store of 5,117 sq m was approved on the Megabowl site and that a further permission for the development of a Morrison store of 5,148 sq m was approved in January 2011 and the redevelopment of the Tesco store in the district centre.

3. The Newport Local Development Plan 2011 - 2026

The Newport Local Development Plan 2011 – 2026 Deposit Draft was published in April 2012. It sets out a range of policies including those for retail and specifically the district centres. Chapter 2 sets out the strategic policies.

Policy SP11 deals with the Eastern Expansion Area. This area is centred on the redundant part of LLanwern Steelworks and is identified for a mixed use sustainable urban expansion providing a range and choice of housing, employment land and community uses.

Policy SP20 addresses the assessment of retail need indicating proposals will be the subject of the sequential test and also, if not in a defined centre, to an assessment of need. The written justification to this policy (paragraph 2.82) identifies Newport’s retail hierarchy as:

Newport City Centre
District Centres (refer policies R5 – R7)
Local Centres
Out of Centre retail sites

Policy R5 in the retail chapter addresses retail development in the following district centres as:

- Beechwood
- Caerleon
- Caerleon Road
- Commercial Road
- Corporation Road
- Handpost District
- Mawdde
- Malpas

It should be noted that the previously defined district centres are no longer so designated (Bettws, Clarence Place and Ringland). The policy indicates that improved shopper facilities will be favoured in these centres provided that the proposal is of an appropriate scale; it would not have an adverse impact on the vitality and viability of the City Centre; the proposal is fully accessible by a range of non-car borne means; and that satisfactory parking, access and servicing arrangements will be provided.
The supporting justification (paragraph 8.14) acknowledges that the district centres vary in size but are predominantly linear concentrations of commercial and shop premises along main roads leading into the City. Newport Retail Park is identified as the exception as it is based upon a purpose built retail park.

Policies R6 and R7 apply specifically to Newport Retail Park which is also defined as a District Centre. Policy R6 states:

“No additional retail sales floorspace will be permitted at Newport Retail Park District Centre.”

Policy R7 states:

“If Policy R6 is satisfied, proposals in Newport Retail Park District Centre will be permitted provided that:

i) No new convenience retail floorspace is included;
ii) Any retail unit proposed is greater than 500 sq m;
iii) The type or range of goods sold does not threaten the viability and viability of the City centre;
iv) The sitting and design of the proposals enhance and improve links to the adjoining residential development, particularly for pedestrians and cyclists;
v) The surrounding highway and transportation network has capacity to serve the development, and that access and servicing arrangements can be accommodated in a satisfactory manner;
vi) The proposal is fully accessible on foot, by bicycle and by public transport;
vii) Satisfactory car parking arrangements exist or can be provided.”

With reference to the Newport Retail Study and Capacity Assessment (Colliers International July 2010) the supporting justification assesses the quality of the retail provision on the Park.

It is considered that Newport Retail Park has developed to such an extent that it has more than sufficient floorspace and range of traders to fulfill a district centre role even allowing for the proposed development of the Eastern Expansion Area. Furthermore, due to its location and critical mass, further development of the Retail Park will pose a threat to the vitality and viability of the City Centre.

The Colliers International Retail Study did not identify any significant quantitative need for additional convenience floorspace in the City during the Plan period unless it were to enhance the City Centre’s retail offer. The study also concluded that the further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and changing its position in the retail hierarchy.

Newport Retail Park typically has larger units than are found in the City Centre. Consequently to limit impact of new proposals in the Retail park on the City Centre, it is proposed to impose a minimum unit size of 500 sq m for new proposals. The intention is to reduce the likelihood of an
increase in the number of smaller units selling non-bulky comparison goods that are commonly associated with a City Centre location and which could therefore impact on the City Centre’s viability & Vitality. Proposals for sale of non-bulky comparison goods in larger store units will need to be carefully considered for the same reason, and a restriction to bulky goods is in accordance with the recommendations of the retail study.

The creation and enhancement of links between the district centre and the Eastern Expansion Area are considered necessary to improve the functional connection between the two. Where new development comes forward, the design and layout of proposals should seek to facilitate and enhance movement, particularly by foot and cycle, between the district centre and the new residential development.

Proposals will need to demonstrate that the highway and transportation network can cope with the movements they generate and that appropriate car parking provision will be provided. Pedestrian and cycle routes linking the district centre to the Eastern Expansion Area should form an integral part of any proposals.

4. National Welsh Retail Planning Policy

Land use planning policy for Wales is set out in Planning Policy Wales (Edition 5, November 2012). This document provides the policy framework for the preparation of development and is also a material consideration in the determination of planning applications. The changes introduced in this edition strengthened and clarified the presumption in favour of sustainable development.

It states that the planning system should be efficient, effective and simple in operation and that it is not the function of the planning system to interfere with or inhibit competition between users of and investors in land or to regulate development for other than land use planning reasons (1.2.3).

Every planning authority is required to prepare a local development plan (2.1.1.) which is to provide a firm basis for rational and consistent decision making (2.1.2). The determination of planning applications is to be made in accordance with the plan unless material considerations indicate otherwise. It is for each local planning authority to determine the content of the development plan for its area having regard to national policy and local circumstances (2.1.4).

Chapter 10 addresses "Planning for Retail and Town Centres". This chapter was not subject of any substantive changes. It sets out four objectives for retailing and town centres as follows:

- Secure accessible, efficient, competitive and innovative retail provision for all the communities of Wales, in both urban and rural areas;
- Promote established town, district, local and village centres as the most appropriate locations for retailing, leisure and other complementary functions;
- Enhance the vitality, attractiveness and viability of town, district, local and village centres; and to
- Promote access to these centres by public transport, walking and cycling."
The guidance goes on to set out other requirements which may be summarised as follows:

- The provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment (10.1.2);
- Town, district, local and village centres are the best locations for retail provision at an appropriate scale (10.1.2);
- Local planning authorities should develop a clear strategy and policies for retail development which seek to achieve vital, attractive and viable centres (10.2.1);
- Local planning authorities should develop a clear strategy and policies for retail development which seek to achieve vital, attractive and viable centres (10.1.2);
- Local planning authorities should set out a framework for the future of town, district, local and village centre in their area which promote a successful retailing sector supporting existing communities in the centre (10.2.1);
- Development Plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1);
- Development Plans should identify changing pressures and opportunities and devise appropriate responses to them. Dealing with change may mean re-defining the boundaries of centres (10.2.1)."

The Guidance also sets out how policies should support existing centres to revitalise them and increase their attractiveness. It is noted that whilst retailing should underpin town centres, policies shall encourage a diversity of uses (10.2.4). Mixed use development should be encouraged and leisure uses can benefit town and district centres by contributing to a successful even economy (10.2.4).

The Guidance goes on to consider the aplication of the sequential approach. Development Plans should consider whether new sites should be identified in identified centres for new retail development (10.2.9). It also states that smaller scale retail provision etc. should preferably be located in district, local and village centres (10.2.9).

In deciding whether to identify sites for retail development, planning authorities should consider whether there is a need for additional provision - either quantitative or qualitative (10.2.10). Where a need is identified, a sequential approach should be adopted to the selection of sites (10.2.11). It states:

"Adopting a sequential approach means that first preference should be for town centre locations, where suitable sites or buildings suitable for conversion are available. If they are not available, then consideration should be given to amending the boundaries of existing centres so that appropriate edge of centre sites are included, as referred to in paragraph 10.2.1. Where this is not practical, then district and local centres might be considered and, only then, out of centre sites in locations that are accessible by a choice of means of transport."

The Guidance also states planning authorities should adopt a positive approach and where allocating sites for different types of retail development should take into account factors such as floorspace, quality, convenience and attractiveness and traffic. Rigid floorspace limits should not
be prescribed whether for town centres or other development that would unreasonably inhibit the retail industry from responding to changing demand and opportunity. Proposals may come forward after the Development Plan has been adopted and so Plans should include a criteria based policy against which such proposals can be judged (10.2.12).

PPW sets six criteria for Development Plans. It states they should:

- Establish a strategic role to be formed by the main centres in the retail hierarchy;
- Set out measures to invigorate particular centres, as appropriate;
- Set out detailed policies to achieve vital, attractive and viable centres;
- Allocate sites for new retail and leisure facilities and other uses best located in town centres, where there is assessed to be a quantitative or qualitative need using the sequential approach;
- Include a criteria based policy against which proposals coming forward on unallocated sites can be judged; and
- Set out policies for primary and secondary frontages, where appropriate.

The Guidance also set out the approach to determine planning applications for retail development. Ten factors are identified which should be taken into account (10.3.1):

i) Compatibility with a Community / Development Plan strategy;
ii) The need for the development – unless the site is within a defined centre or allocated for development in an up to date Development Plan;
iii) The sequential approach;
iv) Impact on existing centres;
v) Net gains in floorspace where redevelopment is involved, and whether or not it is like – for – like in terms of comparison or convenience;
vi) The rate of take-up of allocations in the Development Plan;

vii) Accessibility by a variety of modes of travel;
viii) Improvements to public transport;

ix) Impact on travel patterns;
x) Best use of land close to any transport hubs in terms of density and mixed use.

The Guidance advises that it is not the role of the planning system to restrict competition between retailers within centres (10.3.2).

Further technical guidance is provided in TAN 4. This document advises four types of centre – local centre, district, town and regional. Town centres are defined as:

"Town centre : this covers city, town and suburban centres which provide a broad range of facilities and services and which fulfil a function as a focus both for the community and for public transport. It excludes small parades of shops or purely local significance."

5. An Examination of the Representations to the Draft Plan

We have been asked to comment on representations made by four parties on the proposed changes to the policy for Newport Retail Park District Centre. We note that these objections
seemed to be made to oppose development at the district centre which is in the commercial interest of the relevant objector.

We summarise the objections as follows:

**William Morrison Supermarkets** – consider that the retail park has expanded beyond what is appropriate for a district centre but considers the policy approach of seeking to restrict additional sales floorspace is fundamentally unsound and that accordingly the district centre status should be removed and all facilities considered as being out of centre.

**Friends Life Company Limited** – consider there is a conflict between Policies R6 and R7; if Policy R6 prevents new retail space there is no need for Policy R7. Policy R7 is contrary to national planning policy which aims to support the vitality and viability of district centres. The objectives of the policy to improve accessibility can only be met through additional retail development and the forging of linkages which could best be achieved through new retail development on vacant land adjacent to 7 Styles Avenue. Development within the NRPDC boundary should not be subject to additional restrictions in comparison with other district centres as this would prevent investment and improvement, and integration with the Eastern Expansion Area. Policy R7 and its supporting justification should therefore be deleted and the retail park considered under Policy R5.

**Johnsey Estates Limited** – Considers the UDP designates Newport retail Park as a district centre and the extent of that district centre has been determined in subsequent planning decisions by Officers of the City Council. The proposed reduction in area in the emerging Newport Local Plan excludes a number of town centre uses which is artificial in the context of Planning Policy for Wales and irrational in that it excludes the area closest to the Eastern Expansion Area and consequently seems inconsistent with the objective of achieving closer integration. There also appears to be confusion regarding the currently proposed extent which seems to apply only to a retail core and the definition of the wider district centre as a whole.

Policy R5 contains sufficient tests to control development in all district centres. There is no justification for an embargo on new retail floorspace in Newport Retail Park District Centre and the appropriate test is to consider its impact on the City Centre, such as in criteria 2 of Policy R5. With respect to Policy R7 itself, criteria 1 and 2 are unjustified; criteria 4 is inaccurate as there is no residential development; criteria 5 – 7 are standard development control considerations which are unnecessary.

**Stadium Newport Limited** – suggests delete Policy R6 and R7 and instead rely on Policy R5 supported by existing written justification at paragraphs 8.21 and 8.22. If necessary add criteria (iv) and (vi – vii) from Policy R7.

6. **Our Conclusions to the Appropriate Response to these Representations**

The Newport Local Development Plan 2011 – 2026 reviews district centre designations across the whole district. Some centres are downgraded whilst the extent of Newport Retail Park is defined on a Plan. Specific policies are also introduced to control development in the defined
Newport Retail Park District Centre. It is the latter of these changes which has driven the objections.

This assessment has considered the rationale behind the development of the policy and the changes now proposed in the context of National Planning Policy in Wales. The assessment seeks to establish whether what has been undertaken can be appropriately done within the context of the national policy, and if so if sufficient justification has been provided for the detailed changes in the background documents.

The Newport Local Development Plan was published in April 2012, against the background of National Planning Policy for Wales which was published just over a year earlier in February 2011. Whilst Planning Policy Wales has subsequently been revised, it is not considered that there have been any changes to the retail section which require a change to the approach of the plan.

The national policy approach is to support and promote successful and competitive town, district, local and village centres. National policy requires planning authorities to develop a clear strategy and policy for retail development to achieve vital, attractive and viable centres and to devise appropriate responses to different pressures and opportunities. It is expressly acknowledged that dealing with these changes may mean redefining the boundaries of centres.

PPW also makes clear that retail development should be directed to centres. The application of the sequential approach explains that town centres are different to district and local centres (refer to paragraph 10.2.1. quoted above) but that they are all centres. PPW also confirms that development should be at an appropriate scale to the centre in which it is situated. When undertaking the sequential test, one starts with ‘town’ centres, and then moves to amending the boundaries of those centres, and where this is not practical one considers district and local centres.

The definition of ‘town centres’ in TAN4 includes suburban district centres as distinct from ‘district centres’ which are separately defined. This distinction has implications for the application of the sequential test. It is therefore important to explain the definition of Newport Retail Park so as to accurately place it in the hierarchy for the application of the sequential test.

Within this context, the approach of Newport City Council towards Newport Retail Park both in seeking to define its extent, albeit a somewhat lesser extent than has previously been informally accepted, and to define its strategic role, is appropriate. It is considered that this approach is particularly relevant in this case due to the unusual justification for the designation of this agglomeration of out of centre retailing as a district centre. Whilst the reason for the designation is clear – to provide local shopping facilities for the Eastern Expansion Area – the scale of retailing and other facilities in and around the Newport Retail Park has the clear capacity to perform a much wider role. Consequently it is considered appropriate for the local development plan to define a specific policy role for Newport Retail Park in order to provide control over its function and potential impact on Newport City Centre.

Given the importance placed on centres in national policy, and the distinction between town and district centres, it is appropriate to define a boundary which excludes some of the facilities
existing in the area so as to ensure the defined centre more properly reflects the reason for the designation of the centre (i.e. local shopping needs) and to limit the potential for competition with the higher tier ‘town’ centre. I believe this distinction is particularly important due to the scale of retailing already existing in the area and the potential for this to grow further to the disbenefit of the town centre without appropriate planning policy control based upon achieving the strategic objective of providing a centre to serve local needs. The effect of this boundary definition will be that retail development in the areas outside of the district centre will be subject to the sequential test, will have to demonstrate need and, potentially, accept conditions restricting the range goods sold. The application of these tests will help to protect the vitality and viability of the City Centre.

Turning to the policies applying to Newport Retail Park, I find the wording to Policy R6 to be ambiguous. I believe it is meant to apply to any redevelopment of existing floorspace in the district centre and to prevent any net increase in the overall existing retail sales area. As currently drafted it does not say this clearly and as a consequence there is some confusion as to how policies R6 and R7 are to be read and applied together.

I believe that sufficient control over Newport Retail Park should be capable of being achieved in a single policy. Before turning to consider that policy, I believe there are two points which need to be taken into account.

Firstly, one of the most frequent difficulties in retail planning is to distinguish between different types of floorspace such as gross, net and retail sales simply because there are so many different ways of measuring and defining it. Questions can arise, for example, as to whether the checkouts and areas behind, serving counters in the area behind used by serving staff, internal lobbies, cafes and customer toilets should be included within the definition or not. Whilst this is clearly a question for you to consider, and one which may be debated at the examination. I recommend a definition is included either in the policy or in the glossary and suggest the following:

"Retail sales floorspace – the area within the shop or store which is visible to the public and to which the public has access, including fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, area occupied by retail concessionaires, customer service areas, internal lobbies in which goods are displayed, customer cafes and toilet. For the application of policies in this plan, the retail sales floorspace of shop units with a small customer area with limited display but a large back of house storage area (such as catalogue showrooms) will be treated as comprising 80% of the gross floorspace (gia) of the unit."

Secondly, looking at the overall approach of Policy R6, the prohibition on growth in retail floorspace at the district centre appears to prevent the application of the sequential approach. Consequently that development which, in accordance with the application of the sequential test, cannot take place in the City Centre (the ‘town’ centre in policy terms) or on the edge of the City Centre would either be prevented because it is not allowed to take place at this district centre (assuming the other district centres could not accommodate it) or would automatically leap-frog this district centre to an out of centre location. That result does not seem to be what is intended
by the policy approach and consequently the prohibition on net additional floorspace included in Policy R6 does not seem to accord with national policy.

Accordingly I recommend that Policy R6 and Policy R7 should be joined together as a single policy. The strategic objective for the district centre designation should be stated so that any new development can be tested against that objective. In order to restrict the overall level of convenience store provision, a limitation on the number of convenience stores over 929 sq m retail sales floorspace within the centre should be introduced. This threshold is considered appropriate because, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area. This approach would reflect the recommendation in the retail study that a large new foodstore in the city centre would enhance its retail offer whilst allowing some flexibility for the improvement of local level convenience provision.

I do not agree with the approach towards comparison goods as this would restrict the provision of local shops and could actually be used to justify the provision of larger stores which could have a greater impact on the city centre. A better approach would be to require that new retail development which either increases the net retail floorspace of the centre, or involves the provision of comparison floorspace in excess of 500 sq m retail sales area, is subject to the sequential test and impact assessment to test its impact on the city centre and other district centres. The effect of this approach would be to make larger scale redevelopment in the centre, or its extension, subject to the same tests as out of centre development - justified on the basis of the unusual justification for the district centre's designation. Any development on the edge of the district centre would also be subject to the same policies as out of centre development. This approach would also enable the sequential approach to be applied in a controlled manner.

The Retail Study also recommended a restriction on the range of goods sold at the Newport Retail Park District centre so that it did not evolve in a way which impacts adversely on the city centre. It recommended that the district centre be restricted primarily to the sale of bulky goods. This approach should be incorporated into the new policy in respect of additional net retail floorspace and the change of use of existing floorspace where planning permission is required.

I have drafted a policy for discussion which seeks to capture these points. The only point I have not put in is the starting floorspace against which extensions will be measured as I am not certain of the current position.

Newport Retail Park is a district centre, as defined by TAN4, to provide local shopping facilities for the Eastern Expansion Area. The scale of existing retailing and other facilities in and around the Newport Retail Park has the capacity to perform a much wider role. In order to achieve the policy objective, the boundary of the district centre has been defined. Existing facilities outside of this boundary will be regarded as being out of centre.

Proposals in Newport Retail Park will be permitted provided that each of the following criteria, are met where applicable:
i) There will be no more than one large convenience store with a floorspace in excess of 929 sq m retail sales floorspace in the district centre; other smaller convenience stores serving a local function will be acceptable;

ii) Class A1 retail development which increases the total net floorspace in the district centre (as measured in January 2013) by more than 500 sq m will be required to demonstrate that they accord with the strategic objective of providing local services for the Eastern Expansion Area, comply with the sequential test and do not have a harmful impact on other centres;

iii) The type or range of goods sold does not threaten the vitality or viability of the city centre;

iv) The introduction of other Class ‘A’ services and related community facilities will be supported where they will primarily serve the Eastern Expansion Area and will be subject to control to prevent their change of use to Class A1 use;

v) The siting and design of the proposals should enhance and improve links to the adjoining residential development, particularly for pedestrians and cyclists;

vi) The surrounding highway and transportation network has capacity to serve the development, and that access and servicing arrangements can be accommodated in a satisfactory manner;

vii) The proposal is fully accessible on foot, by bicycle and by public transport;

viii) Satisfactory car parking arrangements exist or can be provided.

Retail sales floorspace is defined in the glossary.

When applying the policy to planning applications quoting a gross internal area, it may be necessary to make an assumption about the net to gross ratio in order to estimate Retail Sales Floorspace. Whilst these ratios vary from retailer to retailer, the general convention is 65-70% for large foodstores and 60-65% for retail warehouses and large retail units. It would be better to seek clarification from applicants as to the actual retail sales floorspace being sought and to base any conditions on the details of the application.
18.1 Chapter 8, Policy R7, of the Revised Deposit Plan sets out a revised policy to cover the consideration of proposals within Newport Retail Park District Centre.

Newport Retail Park

R7 Newport Retail Park District Centre

NEWPORT RETAIL PARK IS A DISTRICT CENTRE, AS DEFINED BY TAN 4, TO PROVIDE LOCAL SHOPPING FACILITIES FOR THE EASTERN EXPANSION AREA. THE SCALE OF EXISTING RETAILING AND OTHER FACILITIES IN AND AROUND THE NEWPORT RETAIL PARK HAS THE CAPACITY TO PERFORM A MUCH WIDER ROLE. IN ORDER TO ACHIEVE THE POLICY OBJECTIVE, THE BOUNDARY OF THE DISTRICT CENTRE HAS BEEN DEFINED. EXISTING FACILITIES OUTSIDE OF THIS BOUNDARY WILL BE REGARDED AS BEING OUT OF CENTRE.

PROPOSALS IN NEWPORT RETAIL PARK WILL BE PERMITTED PROVIDED THAT EACH OF THE FOLLOWING CRITERIA ARE MET WHERE APPLICABLE:

i) THERE WILL BE NO MORE THAN ONE LARGE CONVENIENCE STORE WITH A FLOORSPACE IN EXCESS OF 929 SQ M RETAIL SALES FLOORSPACE IN THE DISTRICT CENTRE; OTHER SMALLER CONVENIENCE STORES SERVING A LOCAL FUNCTION WILL BE ACCEPTABLE;

ii) CLASS A1 RETAIL DEVELOPMENT WHICH INCREASES THE TOTAL NET FLOORSPACE IN THE DISTRICT CENTRE (AS MEASURED IN JANUARY 2013) BY MORE THAN 500 SQ M WILL BE REQUIRED TO DEMONSTRATE THAT THEY ACCORD WITH THE STRATEGIC OBJECTIVE OF PROVIDING LOCAL SERVICES FOR THE EASTERN EXPANSION AREA, COMPLY WITH THE SEQUENTIAL TEST AND DO NOT HAVE A HARMFUL IMPACT ON OTHER CENTRES;

iii) THE TYPE OR RANGE OF GOODS SOLD DOES NOT THREATEN THE VITALITY OR VIABILITY OF THE CITY CENTRE;

iv) THE INTRODUCTION OF OTHER CLASS ‘A’ SERVICES AND RELATED COMMUNITY FACILITIES WILL BE SUPPORTED WHERE THEY WILL PRIMARILY SERVE THE EASTERN EXPANSION AREA AND WILL BE SUBJECT TO CONTROL TO PREVENT THEIR CHANGE OF USE TO CLASS A1 USE;

v) THE SITING AND DESIGN OF THE PROPOSALS SHOULD ENHANCE AND IMPROVE LINKS TO THE ADJOINING RESIDENTIAL DEVELOPMENT, PARTICULARLY FOR PEDESTRIANS AND CYCLISTS;

vi) THE SURROUNDING HIGHWAY AND TRANSPORTATION NETWORK HAS CAPACITY TO SERVE THE DEVELOPMENT, AND THAT ACCESS AND SERVICING ARRANGEMENTS CAN BE ACCOMMODATED IN A SATISFACTORY MANNER;

vii) THE PROPOSAL IS FULLY ACCESSIBLE ON FOOT, BY BICYCLE AND BY PUBLIC TRANSPORT;
viii) SATISFACTORY CAR PARKING ARRANGEMENTS EXIST OR CAN BE PROVIDED.

RETAIL SALES FLOORSPACE IS DEFINED AS FOLLOWS: THE AREA WITHIN THE SHOP OR STORE WHICH IS VISIBLE TO THE PUBLIC AND TO WHICH THE PUBLIC HAS ACCESS, INCLUDING FITTING ROOMS, CHECKOUTS, THE AREA IN FRONT OF CHECKOUTS, SERVING COUNTERS AND THE AREA BEHIND USED BY SERVING STAFF, AREA OCCUPIED BY RETAIL CONCESSIONAIRES, CUSTOMER SERVICE AREAS, INTERNAL LOBBIES IN WHICH GOODS ARE DISPLAYED, CUSTOMER CAFÉS AND TOILET. FOR THE APPLICATION OF POLICIES IN THIS PLAN, THE RETAIL SALES FLOORSPACE OF SHOP UNITS WITH A SMALL CUSTOMER AREA WITH LIMITED DISPLAY BUT A LARGE BACK OF HOUSE STORAGE AREA (SUCH AS CATALOGUE SHOWROOMS) WILL BE TREATED AS COMPRISING 80% OF THE GROSS INTERNAL FLOORSPACE (GIA) OF THE UNIT.

8.21 Newport Retail Park District Centre has now developed to such an extent that it has more than sufficient floorspace and types of traders present to fulfil a role as District Centre, even allowing for the significant development planned to occur in the Eastern Expansion Area of the City (see Newport Retail Study and Capacity Assessment, Colliers International, July 2010 and Newport Retail Park supplement, January 2013). Given its location and critical mass, further development of the District Centre will pose a threat to the viability and vitality of the City Centre, not only in terms of any additional development itself, but also in terms of increasing the cumulative attraction of the District Centre and therefore restrictions are placed on its further development.

8.22 A boundary for Newport Retail Park District Centre is defined in Inset Plan 25. The defined area reflects the purpose of the policy designation, i.e. to provide local shopping facilities for the Eastern Expansion Area, and to limit the potential for competition with the higher tier ‘town’ centre.

8.23 Within the boundary, Newport Retail Park District Centre will be assessed as a District Centre within the retail hierarchy for the application of the sequential test. Retail development in areas outside the defined District Centre will be subject to the sequential test, will have to demonstrate need and if those tests are met will have planning conditions restricting the range of goods sold. The application of these tests will help the vitality and viability of the City Centre and accords with National Planning Policy.

8.24 The Colliers International Retail Study (July 2010) does not identify any significant quantitative need for additional convenience goods floorspace in the City during the Plan period, unless it were to enhance the City Centre’s retail offer. With specific reference to Newport Retail Park, the study concludes that a further expansion of convenience retailing would change the function and character of the District Centre, expanding it beyond what is appropriate in a District Centre and thereby changing its position in the retail hierarchy to the detriment of the City Centre.

8.25 In order to restrict the overall level of convenience store provision, additional convenience stores over 929 sq m retail sales floorspace within the centre will not be supported. This threshold is appropriate because based upon the

current actual retail sales floorspace of operators, it would support smaller stores serving a local and possibly more specialised function, such as convenience stores, discounters and small supermarkets, but would prevent new superstores which would draw trade from a wider area and serve a function that is not commensurate with the District Centre’s role.

8.26 Notwithstanding the above, all retail development that increases the net retail floorspace of the centre in excess of 500 sq m retail sales area will be subject to the sequential test and assessment of need to evaluate its impact on the City Centre and the District Centre. The threshold allows for a level of retail development that is appropriate for Newport Retail Park’s justification as a District Centre, whilst provides a mechanism to assess additional retail development in a manner compatible with the retail hierarchy and national retail planning policy and allow for impact on the City Centre to be minimised.

8.27 Retail floorspace will be measured against the position calculated by the Council at January 2013:

<table>
<thead>
<tr>
<th>Unit/Source</th>
<th>Gross Retail Floorspace</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tesco: figures from planning app ref: 08/0407</td>
<td>12,765 sq m, 2,486 sq m, Total: 15,251 sq m</td>
<td>2,486 sq m are Tesco concession units with consent for A1, A2 &amp; A3.</td>
</tr>
<tr>
<td>Stadium: source RPS info submitted for planning app: 12/1242</td>
<td>27,597 sq m, 376 sq m, Total: 27,973 sq m</td>
<td>376 sq m – gross ancillary floorspace for M&amp;S and Asda café which have been added to the gross A1 as they are ancillary A3 uses not dedicated A3 units.</td>
</tr>
</tbody>
</table>

| Total gross retail floorspace for the LDP defined District Centre | 43,224 sq m |

8.28 When applying the Policy to planning applications quoting a gross internal area, it may be necessary to make an assumption about the net to gross ratio in order to estimate retail sales floorspace. Whilst these ratios vary from retailer to retailer, the general convention is 65-70% for large foodstores and 80-85% for retail warehouses and larger units. The Council will require clarification from applicants as to the actual retail sales floorspace being sought.

8.29 The Colliers Study (July 2010) also recommends a restriction on the range of goods sold at the Newport Retail Park District Centre to avoid it evolving in a way which impacts adversely on the City Centre.

8.30 The primary purpose of the Newport Retail Park District Centre is to serve the Eastern Expansion area. Proposals for non-retail Class A uses will be encouraged provided they are of an appropriate scale to serve the local area.

8.31 The creation and enhancement of existing links between the District Centre and the Eastern Expansion Area are necessary to improve the functional connection between the two uses to justify its allocation as a District Centre. Where new development comes forward, the design and layout of the
proposals should seek to facilitate and enhance movement between the District Centre and the residential development it will serve, particularly on foot and by bicycle.

8.32 Proposals will need to demonstrate that the highway and transportation network can cope with new development, and that delivery and servicing requirements can be satisfactorily met. An appropriate provision of car parking will also need to be provided. In common with other development, the development should be accessible by non-car modes, i.e. footpaths, cyclepaths and bus routes. Pedestrian and cycle routes linking the District Centre to the Eastern Expansion Area should form an integral part of any proposals.