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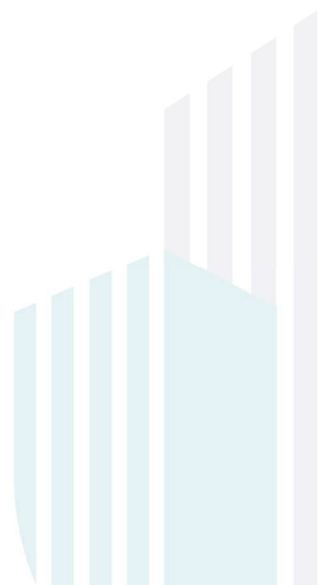
Unit 5 Baglan Bay Retail Park, Port Talbot

Planning Statement

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1 Introduction

- 1.1 This Planning Statement has been prepared by Urban Agile Limited on behalf of Pure Gym Limited ('PureGym') and supports a full planning application at Unit 5 Baglan Bay Retail Park, Port Talbot. The planning application seeks permission for the change of use of Unit 5 from Class A1 to Class D2, together with external alterations.

The Application Site

- 1.2 Baglan Bay Retail Park is located to the north-west of the town centre at Port Talbot adjacent to the A4241 dual carriageway. Access to the retail park is from Christchurch Road and Unit 5 is located to the southern end of the park fronting Afan Way. It provides floorspace of 1,244 sq. m and has been occupied by Poundstretcher, with the adjoining retail units occupied by Pets at Home, Halfords and B&M. There is also a freestanding Lidl store and KFC drive-thru to the northern end of the retail park.
- 1.3 There is further retail and commercial development to the north and east of the site, whilst to the south, on the opposite side of the A421, there are industrial facilities and the Vitality Health & Fitness Club. The nearest noise-sensitive properties are also to the south of the site on Lingfield Avenue (at a distance of approximately 80 metres and separated from the retail park by the dual carriageway).

Planning History

- 1.4 Planning permission for the development of a retail park at Baglan Bay was originally granted in 1997 (ref. P1997/0106). However, this permission was only partially implemented to develop the DIY store (now B&M), the Lidl foodstore and drive-thru restaurant. Unit 5 and the adjoining non-food units were developed under a separate planning permission granted in 2007 (ref. P/2006/1622). The 2007 permission provided for four/five Class A1 retail units and condition no. 3 restricted the range of goods that could be sold. In terms of Unit 5, this prevents the sale of pharmaceutical products, photographic equipment, food and other convenience goods.

The Proposed Development

- 1.5 This planning application seeks permission for the following development:
- 'Change of use from Class A1 to Class D2, together with minor external alterations.'*
- 1.6 The proposal will enable the application site to be occupied by PureGym, the UK's largest gym group with over 300 sites and more than 1 million members. PureGym's success is based on the providing access to high-quality fitness facilities on an affordable and flexible, no-contract basis. Its digital offer is particularly strong and includes free and paid-for workout plans. The nearest existing PureGym sites are in Cardiff, which is served by four separate PureGym facilities. A new gym is also expected to open shortly at Gallagher Retail Park in Caerphilly.

- 1.7 Every gym provides an excellent range of fitness equipment and machinery, with a range of gym classes and other services such as personal training. Gyms operate on a 24-hour basis, seven days a week, providing access to the whole community, including those who work irregular shift patterns such as key workers. Each site typically provides up to 15 full and part-time jobs including management roles, personal trainers, gym instructors and cleaners.
- 1.8 The proposed gym at Baglan Retail Park is expected to comprise a main gym area, studio, free weights area, spin area and functional zone. In addition, changing facilities and showers will be provided, together with separate staff areas. Minor external alterations are proposed at the application site in association with the proposed change of use. These works comprise the replacement of the main entrance doors to the front elevation of Unit 5.

Figure 1.1 - Typical PureGym interior



Structure of this Statement

- 1.9 The remaining sections of this Planning Statement are structured as follows:
- Section 2 sets out relevant national and local planning policy;
 - Section 3 considers the principle of the proposed development;
 - Section 4 considers other relevant planning matters including access and amenities; and
 - Section 5 provides a summary of our findings and conclusions.

2 Relevant Planning Policy

- 2.1 In this section we summarise the planning policy that is relevant to the consideration of the proposed development. This includes Planning Policy Wales (PPW) and the development plan for Neath Port Talbot which currently comprises the adopted Local Development Plan (LDP) 2011-2026.

National Planning Policy

- 2.2 Edition 11 of PPW was published by the Welsh Government in February 2021. It sets out key planning principles for Wales including the need for the planning system to enable sustainable economic growth, make the best use of resources (including previously developed land and buildings), and facilitate accessible and healthy environments, including promoting mental and physical well-being.
- 2.3 Paragraphs 4.3.18 to 4.3.24 of PPW set out a sequential test in relation to the location of new retail and commercial centre development. It states that developers should demonstrate that all potential retail and commercial options within centres, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered. Edge and out-of-centre sites should be accessible by a choice of public and private modes of travel. We note that the retail needs test and retail impact assessments discussed within PPW are not relevant to the proposed leisure development.
- 2.4 Technical Advice Note 4 (TAN4) of 2016 sets out further guidance on retail and commercial development, including in respect of the sequential test. This confirms that alternative sites should be considered in terms of their suitability and availability. Suitability refers *‘to a site or building’s attributes and whether these are sufficient to meet the development requirements of a particular proposal’*.

Local Planning Policy

- 2.5 The Neath Port Talbot County Borough Council LDP was adopted in 2016 and sets out key objectives for the Borough. Of the four overarching objectives set out within the LDP, two are particularly relevant to the proposed development:
- OB 2 – Reduce people’s exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.
 - OB 4 – Maximise accessibility to a range of leisure, recreational, health, social and community facilities in line with the role and function of settlements.
- 2.6 The overarching policies of the LDP include SP2 (‘Health’) which, amongst other things, seeks to encourage healthier, more active and safer lifestyles through the retention of a range of accessible leisure, recreational, health, retail, social, cultural and community facilities throughout the County Borough.
- 2.7 The topic-based policies of the LDP include the following policies that are relevant to the proposed development:
- Policy TR 2 (‘Design and Access of New Development’) – this policy states that development proposals will only be permitted where the development does not

compromise the safe, effective and efficient use of the highway network or create unacceptable levels of traffic generation, provide appropriate levels of parking, is accessible by a range of travel means and is supported by Transport Assessments and Travel Plans where appropriate.

- Policy BE 1 ('Design') – states that development proposals will only be permitted where various criteria are satisfied including that the development complements and enhances the character and appearance of the site and would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community, amongst other things.

3 Principle of the Proposed Development

- 3.1 In this section, we demonstrate that the proposed development accords with the relevant provisions of PPW and the development plan for Neath Port Talbot, and that it is therefore acceptable in principle.

Facilitating Accessible and Healthy Environments

- 3.2 One of PPW's key planning principles is to facilitate accessible and healthy environments, including by promoting mental and physical well-being. The strategic objectives of the Neath Port Talbot LDP also have a strong emphasis on health and wellbeing, seeking to promote an environment that encourages healthy and active lifestyles and to maximise accessibility to leisure and recreation facilities in the County Borough's settlements.
- 3.3 PureGym is at the forefront of the affordable health and fitness sector which serves to extend access via low-cost membership and flexible terms. In doing so it seeks to provide high quality and accessible fitness facilities to all members of the community, with an excellent range of cardiovascular and resistance exercise equipment and a full programme of group classes, as well as personal training services.
- 3.4 The flexible, low-cost offer is attractive to all members of the community and particularly to those on lower incomes. The accessibility of these health and fitness facilities in turn promotes healthier lifestyles, participation in sport and other recreational activities, and consequently delivers social and economic benefits. It should be noted that approximately a third of PureGym members have not previously been members of a gym or health club and that the proposed development will therefore help to promote healthy and inclusive communities, whilst supporting a reduction in health inequalities. The proposal will therefore provide strong support to the relevant objectives of PPW and the LDP, including Policy SP 2.

Sustainable Economic Growth

- 3.5 Both PPW and the LDP seek to support sustainable economic growth and the application scheme will deliver a long-term investment in this part of the County Borough. It will provide a high quality but affordable fitness facility that will serve to diversify the existing leisure and service offer within Port Talbot and expand the range of facilities available to local residents. The flexible format of the PureGym concept, including its 24-hour opening and the absence of fixed term contracts, will support flexible working and enable the benefits of gym membership to be enjoyed by all members of the community.
- 3.6 The proposal will also support new investment in Port Talbot, introducing a national gym operator, diversifying the range of leisure uses within the town and encouraging further commercial investment. In addition, the proposed development support regeneration in the Baglan Bay area and will create up to 15 full and part-time jobs. These jobs will prove particularly attractive to younger people with access to the PureGym Academy which provides career diplomas in gym instruction and personal training.

Sequential Assessment

- 3.7 The LDP does not contain any specific requirement for sequential assessments to be undertaken in respect of leisure developments such as the proposed gym. Policy R3 ('Out of Centre Retail Proposals') relates to 'new retail development or additional retail floorspace' only and there are no equivalent policy provisions for leisure uses. Furthermore, the proposed development seeks the change of use of an existing retail unit and will result in the loss of retail floorspace in an out-of-centre location.
- 3.8 Notwithstanding this, PPW requires the application of a sequential test when considering the location of new retail and commercial development. The application site is in an out-of-centre location, approximately 1.25 km to the north-west of the defined boundaries of the town centre at Port Talbot. For completeness, and in order to demonstrate a robust approach to the application scheme, we have undertaken a proportionate assessment of sequentially preferable sites.

Area of Search and Flexibility

- 3.9 The proposed gym is intended to primarily serve residents of Port Talbot itself and the main built-up area of the town is considered to comprise the primary catchment area. As such, it is appropriate for the sequential assessment to be focussed on alternative sites within and on the edges of Port Talbot Town Centre. We note that this is a linear centre focussed on Station Road and anchored by Aberafan Shopping Centre and a Tesco Superstore.
- 3.10 PureGym intends to operate one of its large-format gyms at Baglan Bay Retail Park with floorspace of 1,244 sq. m. As a budget gym operator, facilities at PureGym are kept to a minimum and do not include features that might be found in health clubs such as swimming pools or customer cafes. The proposed gym will therefore provide areas for cardiovascular fitness machines, functional fitness equipment, resistance weight machines and free weight equipment, together with dedicated spaces for fitness classes. In addition, there will be changing facilities, spaces for staff and other back-of-house facilities and circulation space.
- 3.11 All these elements are considered to be essential as core components of the PureGym offer. Smaller sites may not be suitable for PureGym if they require elements of this core offer to be removed. With this in mind, suitable alternative sites should provide +/- 10% of the proposed floorspace at the application site i.e. approximately 1,120 sq. m and 1,370 sq. m. Such sites must provide large floorplates to accommodate the necessary equipment and facilities, and appropriate ceiling heights. In addition, alternative sites must have good access to car parking as many members will visit the gym as part of existing vehicle trips, including those travelling to and from their place of work. The absence of suitable car parking will significantly inhibit these elements of the proposed gym's trade and may compromise the viability of any alternative site.

Sequentially Preferable Sites

- 3.12 Our search for sequentially preferable sites has considered all sites that are currently being marketed on commercial property websites such as Estate Gazette's Propertylink, LoopNet and Rightmove Commercial. Local and regional agents such as EJ Hales and HRT list commercial property through these sites.

- 3.13 The largest available unit within Port Talbot Town Centre is at 6 Station Road. These premises comprise the former Eden Nightclub which is being marketed by the County Borough Council. The main part of the property dates from 1885 and is arranged over three floors, providing total floorspace of 549 sq. m. The available floorspace represents only 44% of the proposed floorspace at the application site and would require a very significant reduction in the size of the proposed gym and its proposed facilities. As such, and on the basis of size alone, it would not be possible to deliver the application scheme at this site and it would be unsuitable for the proposed development.
- 3.14 In terms of other sites within the town centre, the next largest available property is at 4/5 Riverside Walk. This is being marketed by EJ Hales and provides floorspace of 399 sq. m over ground and first floor. Again, this is significantly smaller than the application site and well below the search parameters identified above. There are also a number of vacant units within Aberafan Shopping Centre that are being marketed by EJ Hales. The largest available unit is at 3-4 West Mall which provides floorspace of just 267 sq. m. All other available units within the shopping centre provide floorspace of less than 200 sq. m.
- 3.15 We have identified only a very small number of alternative sites within the town centre that are being actively marketed. This includes office accommodation at North Cymric House that provides individual suites of less than 100 sq. m and is evidently unsuitable for the proposed development.
- 3.16 This review of sequentially preferable sites has therefore demonstrated that, having regard to an appropriate degree of flexibility, there are no alternative sites that are both available and suitable for the proposed development. The proposal therefore accords with the relevant provisions of paragraphs 4.3.18 to 4.3.24 of PPW.

Summary

- 3.17 In summary, the proposed development is acceptable in principle. It will support sustainable economic development within this part of the County Borough, delivering new investment, supporting the wider regeneration of the Baglan Bay area and creating new jobs. In doing so, it has been demonstrated that the proposal will accord with the sequential approach for commercial centre uses set out within PPW. The proposed development will also significantly improve access to affordable and flexible health and fitness facilities within Port Talbot, contributing to the overall health and wellbeing of the local community and providing strong support to objectives OB2 and OB4 of the LDP and Policy SP 2.

4 Other Matters

Amenity and Security

- 4.1 The application site at Baglan Bay Retail Park is not located in close proximity to any noise-sensitive properties, with expansive areas of commercial and industrial development to the north and east of the retail park. The nearest residential properties are located to the southern side of the A4241 dual carriageway and around 80 metres from the application site. These properties are therefore screened from the retail park by commercial premises to the south of the A4241, the dual carriageway itself and the associated acoustic fencing to either side of the dual carriageway. In this context, it is clear that gym activities at Unit 5 will not have any unacceptable impacts on any noise sensitive properties.
- 4.2 PureGym operates on a 24-hour basis, 7 days a week to enable its members, including those who work shifts and key workers, to fit their fitness regimes around their working patterns. However, we note that group exercise classes are not held at night and the number of visitors to the gym will be relatively low during night-time hours. On weekdays, there would typically be an average of 10-15 visitors per hour between 2300 and 0600, with lower numbers at weekends. Again, given the context of the site, there would be no adverse impacts on amenities associated with either the use of the car park or the proposed opening hours.
- 4.3 In terms of security, access to the gym will be controlled at all times via 8-digit PIN and QR codes that are individual to each member. These are also required to access changing rooms and the gym will be covered by an extensive CCTV network. There will also be 'Help' points located throughout the gym which will allow staff at an alarm receiving centre to communicate with those on site. Such systems operate successfully at over 300 existing PureGym sites.
- 4.4 It is therefore clear that the proposed use will have no adverse impacts on amenities and that significant safeguards will be put in place as part of the standard fit-out and operation of the gym to prevent crime and anti-social behaviour. The proposal will therefore accord with the relevant requirements of Policy BE 1 of the LDP.

Transport and Access

- 4.5 Access and parking facilities at the application site are well established and we are not aware of any issues with their operation. The car park which serves the application site currently provides parking for several hundred vehicles. It should be noted that parking demand associated with the gym would fall outside of the peak trading times of the neighbouring retail units i.e. early morning and early evening on a weekday. Fewer members would use the gym at a weekend when neighbouring retail facilities are likely to be at their busiest. The existing car parking arrangements are therefore sufficient to meet parking requirements associated with the proposed gym use.
- 4.6 The application site is accessible via other modes of transport, including two bus stops within 100 metres of the application site. These stops (adjacent to Morrisons) provide access to regular bus services to destinations including Port Talbot Town Centre, Neath, Baglan, Sandfields, Goytre, Aberavon and Blaengwynfi. There are also dedicated pedestrian and

cycle routes from the retail park to Baglan and Sandfields, and the site is within 1km of the railway station at Baglan.

- 4.7 The servicing requirements of the proposed gym are minimal compared to the permitted retail use at the application site and it will generate significantly fewer delivery/waste collection vehicle movements. It is therefore considered that the proposals will accord with Policy TR 2 of the LDP.

External Alterations

- 4.8 The planning application proposals very minor alterations to the existing retail building comprising the replacement of the main entrance doors with automatic bi-parting folding doors. The proposed doors will facilitate access for all, as well as safe means of escape. This alteration will have very limited impacts on the appearance of the existing building, which is of a modern and functional design, and will accord with relevant planning policies including Policy BE 1 of the LDP.

5 Summary and Conclusions

- 5.1 This Planning Statement has been prepared to support a planning application for change of use of Unit 5 Baglan Bay Retail Park from Class A1 to Class D2, together with minor external alterations. The proposed change of use is intended to enable the occupation of the application site by PureGym and the operation of a high quality, affordable 24-hour fitness facility.
- 5.2 This Statement has demonstrated the acceptability of the proposed development in terms of national and local planning policy. We have demonstrated that the application scheme will deliver sustainable economic growth in accordance with PPW and the Neath Port Talbot County Borough LDP, deliver new investment that supports the regeneration of the Baglan Bay area, provide new employment opportunities for up to 15 people and create real social benefits in terms of providing affordable and accessible fitness facilities that will promote the health of local communities and serve to reduce health inequalities within this part of the County Borough.
- 5.3 A sequential assessment has been carried out which has found there are no available and suitable alternatives to the application site in sequentially preferable locations. The proposal therefore accords with the relevant requirements of PPW. The location of the proposed gym is accessible, served by adequate car parking and provides access to public transport facilities. The proposed external alterations comprise very minor works and the 24-hour operation of the site will not give rise to any unacceptable impacts on neighbouring properties. PureGym adopts extensive measures to ensure a safe and secure environment for its members. The proposal will therefore also accord with the relevant provisions of Policies BE 1 and TR 2 of the LDP.
- 5.4 We therefore consider that this proposal meets all relevant requirements of local and national planning policy, and we commend this planning application to the Council.