

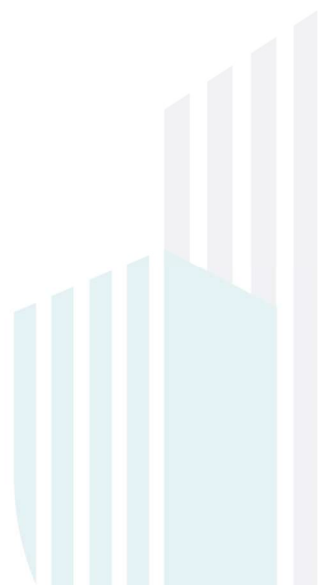


Urban Agile
planning & regeneration

Vale of Neath Retail Park, Neath

Planning Statement

April 2024



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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 the former Carpetright/Topps Tiles, Vale of Neath Retail Park, Neath. The planning application seeks permission for the change of use of the unit from Class A1 to Class D2.

The Application Site

- 1.2 Vale of Neath Retail Park is a small development to the north of the town centre at Neath. It comprises two freestanding retail warehouse units occupied by What! (the former Carpetright and Topps Tiles units), and by Halfords. The site is accessed from Cadoxton Road (A4230) via Golwg-Y-Gamlas which also provides access to a Lidl store to the north-east. The retail park provides parking for around 100 vehicles. To the south of the site is the A465 dual carriageway and the River Neath. Burger King and Neath College are located to the south-west, whilst there are residential properties to the north side of Golwg-Y-Gamlas and to the opposite side of Cadoxton Road.

Planning History

- 1.3 Planning permission for Vale of Neath Retail Park was originally granted in the 1996 (ref. N1995/0413) with reserved matters approved in 1997 (ref. P1997/0857). The original permission was subject to restrictions on the retail use of the site, preventing the sale of various types of comparison goods and restricting the amount of floorspace that could be used for the sale of convenience goods.
- 1.4 The northern retail unit (the subject premises) was originally occupied by Lidl which relocated to its existing store in the mid-2000s. In 2006, planning permission ref. P2006/1358 was granted for works associated with the subdivision of the former Lidl unit, the eastern part of which was subsequently occupied by Carpetright and the western part by Topps Tiles. These operators have both vacated the site which was recently re-amalgamated and occupied by What!, a variety retailer with a number of stores in south Wales.

The Proposed Development

- 1.5 This planning application seeks permission for the following development:
- 'Change of use from Class A1 to Class D2.'*
- 1.6 The proposal will enable the application site to be occupied by PureGym, the UK's largest gym group with over 350 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 Port Talbot and Merthyr Tydfil.
- 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 Vale of Neath Retail Park is expected to comprise a main gym area, studio, free weights area and functional zone. In addition, changing facilities and showers will be provided, together with separate staff areas.

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 12 of PPW was published by the Welsh Government in February 2024. 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 Policy 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 LDP does not contain any specific policies in relation to leisure uses such as gymnasiums, with Policy R3 concerned only with retail development outside of town centres.

This is considered further in Section 3. The topic-based policies of the LDP include the following policies that are relevant to the proposed development:

- Policy EN8 ('Pollution and Land Stability') – this policy states that proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity will not be permitted. This includes consideration of noise pollution.
- 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.

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 Neath 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 Neath, 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 outside of a town centre.
- 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, albeit well related to Neath Town Centre being located approximately 325 metres to the north of the town centre boundary. 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 Neath 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 Neath Town Centre. We note that Neath is a traditional town centre focussed on Green Street and New Street but with some larger units on its edges including B&M, Morrisons and The Range (former Wilko). Other town centre facilities include Gwyn Hall cultural centre and Neath Leisure Centre.
- 3.10 PureGym intends to operate one of its large-format gyms at Vale of Neath Retail Park with floorspace of 975 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 875 sq. m and 1,075 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 regularly 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. We have not identified any alternative sites that would meet the search parameters set out above including in terms of floorspace and layout.

- 3.13 The largest available commercial properties are at Wind Street, forming part of the town centre redevelopment scheme between the new leisure centre and The Range. The scheme is being marketed by EJ Hales and the largest unit provides floorspace of 291 sq. m at ground floor. This would represent only 30% of the floorspace at the application site and would require a very significant reduction in the size of the proposed gym and its proposed facilities. Furthermore, we understand that a library operates to the first floor and significant acoustic mitigation would be required between the proposed gym and such a use. 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 9 Windsor Road and is being marketed by upad. The building is located at the junction of Windsor Road and Alfred Street comprising a traditional, three storey building that was previously a public house. The ground floor is now available for alternative commercial uses but provides floorspace of only 167 sq. m. As such, it would be unsuitable on the basis of size alone, being significantly smaller than the required floorspace and the identified search parameters.
- 3.15 There are a relatively small number of other properties being actively marketed on a freehold or leasehold basis within and on the edges of Neath Town Centre. These are all significantly smaller than the application site and mainly comprise traditional commercial properties that will evidently be 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, 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 Neath, 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 Vale of Neath Retail Park is an established commercial location and the What! unit and its associated car parking is set down from residential development to the north and east. It is also screened from Cardoxton Road by mature landscaping. The application is supported by an acoustic assessment that has been prepared by RBA Acoustics. This has considered potential impacts of the proposed use on the amenities of the nearest noise-sensitive properties, which are to the east of Golwg-Y-Gamlas.
- 4.2 The report assesses noise breakout from the proposed gym to the environment, based on sound insulation testing of the existing facades and activity noise levels measured at existing PureGym sites. Appropriate noise targets have been set on the basis of the criteria set out within the Gym Acoustics Guide published by the Association of Noise Consultants. The testing has found that gym activity will generally meet the target for noise-sensitive residential properties of 5dB below ambient sound levels at façade of the nearest property. However, it is recommended that if a spin/studio space (which is used for classes and features amplified music) is to be located near to the southeaster façade then this should be acoustically lined in accordance with the specifications recommended at section 5.2 of the report. These measures could be secured by an appropriately worded planning condition.
- 4.3 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.
- 4.4 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.
- 4.5 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

- 4.6 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 around 100 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.

- 4.7 The application site is accessible via other modes of transport, including two bus stops within 100 metres of the application site. These stops (on Cardoxton Road) provide access to five different bus services to destinations including Neath Town Centre, Coelbren, Aberdulais, Glynneath and Pontneddfechan. The site is also within reasonable walking distance of Neath Railway Station (approximately 600 metres to the south) which is served by local and national services. There are good pedestrian links between the retail park, the town centre and residential areas to the north and west.
- 4.8 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.

5 Summary and Conclusions

- 5.1 This Planning Statement has been prepared to support a planning application for change of use of the What! unit at Vale of Neath Retail Park from Class A1 to Class D2. 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 in this part of Neath, 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 use 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.