

Merthyr Tydfil  
Replacement Local Development Plan (2016-2031)  
**EXAMINATION**

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**AGENDA**

**for**

**Hearing Session 5 on 28 June 2019 at 10:00**

**MATTER 5: COMMERCIAL, RETAIL, LEISURE AND TOURISM DEVELOPMENT**

**Opening remarks and introductions**

**5.1. Employment allocations (policy EcW1 and Appendix 1)**

- a. Policy EcW1 allocates over 30ha of land for B uses at four locations<sup>1</sup>. Would these sites be capable of accommodating identified demands for both smaller and larger units<sup>2</sup>?
- b. Policy EcW1 and Appendix 1 indicate that office floorspace would be permitted at the allocated employment sites.
  - i. Have these locations been sequentially tested<sup>3</sup>?
  - ii. Would the development of office floorspace at these locations be contrary to core monitoring indicator 14.3?
- c. The adopted Local Development Plan (LDP) anticipates that the Hoover Factory car park (allocation EcW1.1) would be delivered between 2012-16 and the Ffos-y-Fran site (allocation EcW1.3) between 2017-21<sup>4</sup>. In addition, the ELR notes that uncertainties around access, viability and feasibility make it difficult to determine the quantum of employment land which could be delivered at Ffos-y-Fran<sup>5</sup>.
  - i. Is there a realistic prospect of these sites delivering the anticipated quantum of employment floorspace within the plan period?
  - ii. Given the Plan's over-allocation of employment land<sup>6</sup> has the suitability of these sites for housing uses (or a mix of uses) been assessed<sup>7</sup>?
- b. Does monitoring indicator 12.1 provide an effective basis on which to monitor delivery of employment floorspace at all allocated sites? Given the findings of the Review Report<sup>8</sup>, should *completions* be monitored rather than planning permissions?

**5.2. Protecting employment sites (policy EcW2)**

- a. Policy EcW2 permits certain changes of use where "it can be demonstrated that the existing use is *inappropriate*". What does this mean in practice?

**5.3. Retail hierarchy and centres (policies EcW3, EcW5 and EcW6)**

- a. Does policy EcW3 strike an appropriate balance between rigour and flexibility?

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<sup>1</sup> EcW1.1 Hoover Factory car park; EcW1.2 Goatmill Rd; EcW1.3 Ffos-y-Fran; EcW1.4 S of MT Industrial Park

<sup>2</sup> Employment Land Review 2018 [SD35] paragraph 8.13

<sup>3</sup> Planning Policy Wales Edition 10 (PPW) paragraph 4.3.21

<sup>4</sup> Merthyr Tydfil Local Development Plan 2006-2021, Appendix 5

<sup>5</sup> Employment Land Review 2018 [SD35] paragraphs 6.41 and 8.53 and Table 31

<sup>6</sup> Employment Land Review 2018 [SD35], based on historic rates of take-up and assuming a 40% plot ratio

<sup>7</sup> PPW paragraph 4.2.17

<sup>8</sup> Review Report 2016 [SD20] paragraph 2.2

- b. Should policy EcW3 also apply to complementary non-retail uses as indicated at paragraph 7.1 of Technical Advice Note (TAN) 4 'Retail and Commercial Development'?
- c. Is the Plan sufficiently clear about how the sequential test would be applied, including for stores selling bulky goods or requiring showrooms<sup>9</sup>?
- d. The Plan describes both Trago Mills and Cyfarthfa Retail Park as edge-of-centre retail locations<sup>10</sup>.
  - i. Does this accord with paragraph 7.4 of TAN 4?
  - ii. Does the evidence support either location being identified as 'edge-of-centre'?
- e. The second part of policy EcW5 sets out criteria for assessing changes of use to non-retail uses in the Primary Shopping Area and local centres.
  - i. Are the first two criteria effective?
  - ii. Are the 'or' and 'and' clauses correct and able to be implemented consistently?
  - iii. Should the final criterion seek to protect the viability of existing businesses with reference to the 'agent of change principle' included in PPW<sup>11</sup>?
- f. Monitoring indicator 14.7 refers to non-residential uses. Should this be non-retail uses?

#### **5.4. Retail supply and allocations (policies EcW4 and SW6)**

- a. The evidence<sup>12</sup> indicates that the Hoover Strategic Regeneration Area (HSRA) could support around 320sqm of class A use floorspace, but appears to assume a greater quantum of dwellings and employment floorspace than has been allocated at the site.
  - i. In light of this is the quantum of local convenience retail floorspace allocated at the HSRA (409sqm), and its inclusion within a new local centre, justified?
  - ii. Have potential alternative, deliverable sites for accommodating any residual need for retail and commercial leisure floorspace been rigorously and sequentially assessed?

#### **5.5. Tourism development (policy EcW7)**

- a. Is the Plan founded on evidence<sup>13</sup> which adequately considers potential needs for all forms of tourism and leisure development?
- b. Should the potential economic and social benefits of tourism proposals outside settlement boundaries be considered alongside other considerations in policy EcW7?
- c. Would the policy facilitate the provision of complementary tourism developments as sought by national policy<sup>14</sup>?

#### **5.6. Any other matters**

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<sup>9</sup> PPW paragraphs 4.3.19 and 4.3.23

<sup>10</sup> Plan paragraphs 4.40 and 6.8.27

<sup>11</sup> PPW paragraphs 4.3.44 and Chapter 6

<sup>12</sup> Retail and Commercial Leisure Study 2017 [SD30] paragraph 5.45

<sup>13</sup> Retail and Commercial Leisure Study 2017 [SD30]

<sup>14</sup> PPW paragraph 5.5.6