

**Proposed Coffee Shop with Drive Thru Facility
Land to the South of Cyfarthfa Retail Park, Swansea Road, Merthyr Tydfil**

Planning Statement

August 2024



7-10 Adam Street, London WC2N 6AA
www.burnettpd.co.uk

Contents

1. The Proposal 1

2. Relevant Planning History 4

3. Planning Policy Overview 6

4. Assessment 8

5. Summary & Conclusions 14

Appendices

1. Sequential Test Assessment – Merthyr Tydfil Town Centre

Burnett Planning & Development Limited
7-10 Adam Street
London
WC2N 6AA

www.burnettpd.co.uk

1. The Proposal

- 1.1 Corona Vulcan Merthyr Limited, the owner of Cyfarthfa Retail Park, has submitted a planning application for the development of a coffee shop with drive thru facility (mixed Class A1/A3) at land to the south of Cyfarthfa Retail Park, Swansea Road, Merthyr Tydfil.
- 1.2 The application site already has planning permission for a coffee shop with drive thru facility granted on 2 May 2019 under planning permission P/18/0399 and renewed under planning permission P/23/0254 dated 1 May 2024.
- 1.3 The Applicant has now agreed terms with Costa Limited, trading as Costa Coffee, to operate the proposed coffee shop with drive thru facility and the current planning application has been submitted for an amended form of development to meet Costa's requirements.
- 1.4 The revised proposals present a more efficient form of development that requires slightly less land take than the consented scheme. The current application site omits a strip of land on the south east boundary that was included in the approved application site and will now remain undeveloped.
- 1.5 The proposed coffee shop unit is the same size as that already approved, i.e. 167sqm gross. The building is sited in broadly the same position as approved but now sits parallel to the south west boundary of the site.
- 1.6 Consistent with the approved scheme, the drive thru lane extends around the south west side of the building, routing drive thru customer vehicles in a clockwise direction, with the collection booth positioned on the north east elevation. The main customer entrance is on the east elevation facing the car park.
- 1.7 The delivery door is on the west elevation. A 2m close boarded timber fence refuse bin enclosure is situated on the north west side of the drive thru lane screened from the adjacent roundabout by landscape planting.

- 1.8 The proposed site access is a new junction onto Swansea Road broadly as per the consented scheme. The applicant is willing to accept a condition, consistent with Condition 5 in the extant planning permission, that requires the installation of a barrier along the centre of the Swansea Road carriageway, opposite the proposed access, to prevent vehicles turning right into the site.
- 1.9 Pedestrian access from Swansea Road is provided which was also a feature of the approved scheme.
- 1.10 The proposed development has 17 car parking spaces including 2 spaces for blue badge holders and 2 spaces with EV charging facilities. Four cycle parking spaces are proposed in 2 Sheffield type stands.
- 1.11 Due to site levels the approved and proposed schemes both require retaining structures. The proposed scheme positions a grey stone clad retaining wall along part of the south west boundary which varies in height from 0.5m to 2m. The grey stone finish is in keeping with the local material palette, including the nearby Cyfarthfa Castle.
- 1.12 The revised layout allows for a similar amount of boundary landscaping compared to the approved scheme. Around 400sqm of land is to be landscaped in the proposed revised scheme compared to around 450sqm in the approved scheme which included 100sqm of additional land on the south east boundary that was to be largely landscaping that is not part of the current application site.
- 1.13 The proposed building is a contemporary design with bold, clean lines using high quality materials and finishes, including blue brick, western red cedar timber cladding, areas of white and red render, and dark grey and red polyester powder coated pressed metal canopies and parapets. Tall shopfront windows to the front elevation, with dark grey PPC metal frames, will provide visual amenity, allowing views into the building and outwards light-spill towards the car park.
- 1.14 The car park and footpaths will be finished in tarmac with grey textured paving to the building frontage and perimeter.

- 1.15 The proposal, which meets Costa's operational requirements, can finally deliver development on this vacant site that first got planning permission for coffee shop drive thru development over 5 years ago. Costa will employ 15 people in the proposed coffee shop in a mix of full time and part time positions.

2. Relevant Planning History

2.1 Planning permission P/18/0399 was granted on 2 May 2019 for;

“Erection of a coffee shop (use class A1/A3) with drive-thru facilities and associated car parking, service area and landscaping (Full)”

2.2 The Delegated Report noted the ancillary nature of the proposal, i.e.;

“...consideration is given to the particular nature of the proposal, to essentially provide an ancillary food and drink establishment to Cyfarthfa Retail Park. The provision of a coffee shop would likely have a limited catchment area, which would generally rely on business generated though linked trips to the retail park.”

2.3 Condition 1 in permission P/18/0399 required that the development shall be begun not later than 5 years from the date of the decision, i.e. not later than 2 May 2024.

2.4 In the period since permission P/18/0399 was granted, in May 2019, economic circumstances have changed significantly, particularly due to the COVID-19 pandemic. This affected the Applicant's ability to secure a tenant, which is a prerequisite to progressing with the development.

2.5 In October 2023, reflecting that a tenant had still not been secured, the Applicant submitted a planning application (P/23/0254) under Section 73(5) of the Town and Country Planning Act 1990 to vary Condition 1 in permission P/18/0399 to extend the time period for commencement of development.

2.6 Circular WGC 016/2014 – The Use of Planning Conditions for Development Management states (at paragraph 5.21) that as a general rule applications for renewal of planning permissions should only be refused where there has been some material change in planning circumstances since the original permission was granted; or continued failure to begin the development will contribute unacceptably to uncertainty about the future pattern of development in the area; or the application is premature because the permission still has a reasonable time to run.

2.7 The LPA was satisfied that none of the circumstances mentioned in Circular WGC 016/2014 applied to the renewal proposal. Planning permission P/23/0254 was

granted on 1 May 2024 and requires the development to be begun not later than 1 May 2029.

3. Planning Policy Overview

The Development Plan

- 3.1 Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 (the LDP) was adopted in January 2020. This post dates the approval of the original coffee shop with drive thru facility on the site under application P/18/0399, granted in May 2019 but the Replacement LDP was at an advanced stage in production when application P/18/0399 was being assessed having been submitted for Examination in January 2019.
- 3.2 The renewal application P/23/0254, granted in May 2024, was assessed under the current LDP and was found to be in conformity with it.
- 3.3 LDP Policy SW4: Settlement Boundaries encourages development within urban areas and supports the re-use of previously developed land.
- 3.4 Policy EcW3 identifies that Merthyr Tydfil Town Centre is the favoured location for retail, leisure, and other complementary development, being situated at the head of a retail hierarchy and being followed by the local centres of Dowlais, Gurnos, Cefn Coed and Brecon Road/Morgantown, Troedyrhiw, Aberfan, Treharris and a new local centre forming part of the 'Hoover Strategic Regeneration Area'.
- 3.5 The Policy states that outside the identified centres in the retail hierarchy, proposals will be subject to an assessment of need and a strict application of the sequential test.
- 3.6 Policy EcW6 identifies Cyfarthfa Retail Park as an “*out-of-town retailing area*”. This Policy states that proposals for retail development on new sites or existing retail areas in out-of-town locations, including changes of use, extensions, the merger or subdivision of existing units or amendments to existing planning conditions relating to the sale of goods will only be permitted where:
 - It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing town or local retail centre, and

- The proposal would not either individually or cumulatively with other existing or consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the town or local centres

3.7 LDP paragraph 6.7.54 states that retail impact assessment will be required where the proposal is for at least 2,500sqm gross floorspace and that retail impact assessments that are proportionate to the potential impacts may also be required for smaller retailing proposals.

3.8 Other relevant LDP policies include Policy SW11: Sustainable Design and Placemaking; Policy EnW1: Nature Conservation and Ecosystem Resilience; and Policy EnW4: Environmental Protection.

Planning Policy Wales

3.9 Planning Policy Wales Edition 12 was published in February 2024 and was a material consideration in the assessment of the renewal application P/23/0254.

3.10 PPW policies on placemaking and sustainable design; accessibility; retail need, impact and sequential test; landscape and biodiversity; and environmental quality are relevant to the consideration of the application.

4. Assessment

Land Use

- 4.1 The application site is within the settlement boundary and Primary Growth Area defined in the Replacement LDP, as was the case under LDP 2006 – 2021. Current LDP Policy SW4: Settlement Boundaries encourages development within urban areas and supports the re-use of previously developed land.
- 4.2 The Delegated Report on the original application P/18/0399 noted that the proposal would not be out of character with its surroundings, being located adjacent to the Retail Park, and that the principle of development was acceptable subject to compliance with other relevant LDP policies. The renewal application P/23/0254 was also found to be acceptable on the same basis.
- 4.3 The revised form of coffee shop with drive thru facility now proposed is not significantly different to that already approved and, therefore, the current application proposal is clearly an acceptable form of land use in principle and confirms with LDP Policy SW4.

Retail Impact

- 4.4 It has recently been established, in May 2024, under the approval of application P/23/0254 that the same size of coffee shop with drive thru facility as proposed in the current application is acceptable in terms of need, retail impact and sequential test.
- 4.5 The proposal is not for a scale or type of retail development that requires an assessment of need (i.e. a typical convenience goods or comparison goods needs assessment) and is too small to require retail impact assessment.
- 4.6 As reflected in the approval of the previous applications, assessment of retail need and retail impact is not required because of the particular nature of the proposal, i.e. essentially providing an ancillary food and drink establishment to Cyfarthfa Retail Park; with a limited catchment area unlikely to overlap with the catchment of town centre coffee shops/cafes.

- 4.7 In terms of the sequential test, again consistent with the assessment of the previous applications, the ancillary nature of the proposal and the inclusion of the drive thru facility mean that locating it as part of the established retail park is justified.
- 4.8 To the extent that it is necessary to give further consideration to town centre or edge of centre sites given this location specific justification, an up to date sequential assessment (Appendix 1) has not identified any suitable town centre or edge of centre opportunities that are available to accommodate the proposal in any event.
- 4.9 Consistent with the findings under application P/23/0254, none of the vacant units in the town centre are suitable to accommodate a drive thru lane. There are no town centre or edge of centre sites that are suitable and available to accommodate the proposal including the former bus station site at Victoria Street.
- 4.10 There are no suitable and available opportunities to accommodate the proposal in the local centres at Dowlais, Gurnos, Cefn Coed and Brecon Road/Morgantown, Troedryhiw, Aberfan, Treharris or at the proposed new local centre forming part of the 'Hoover Strategic Regeneration Area'.
- 4.11 The proposal complies with PPW paragraphs 4.3.13 – 4.3.29 and Replacement LDP Policy EcW3.

Design & Landscaping

- 4.12 The submitted Design & Access Statement explains that the proposal is for a sustainable design that responds to the constraints and opportunities presented by the site while meeting the operational requirements of the operator, Costa Limited, which is critical to the delivery of the development.
- 4.13 The proposal meets the relevant requirements of LDP Policy SW11. It is appropriate to its local context in terms of layout, form, scale, height, massing, elevational treatment and materials. It is a sustainable design that will integrate effectively into the local area providing an ancillary facility for the established Shopping Park and will enhance the street scene at this vacant site. It provides space and facilities for waste collections and recycling. It incorporates a good standard of landscape design

including native tree planting. It will create an active environment that will improve the safety of the site and adjoining footpath.

- 4.14 The proposal complies with relevant aspects of LDP Policy SW11 in terms of its design and landscaping.

Amenity

- 4.15 The Delegated Report on the original application found that the proposal would have a limited and acceptable impact on the amenities of nearby residents. The same conclusion was reached on the renewal application.
- 4.16 There has been no change in the proximity of residential development to the application site since the previous approvals. Therefore, the revised proposal is on conformity with LDP Policy SW11 and Policy EnW4 in terms of protecting amenity.

Highways & Accessibility

- 4.17 The application site is a sustainable location for a coffee shop with drive thru facility as evidenced by the previous approvals for this form of development.
- 4.18 The submitted Transport Statement (TS) explains that the proposed development will be accessible by all modes of transport being within walking and cycling distance of nearby residential areas, with numerous bus services calling at stops in the immediate vicinity. It is also immediately adjacent to and will function as part of the existing Retail Park thereby facilitating linked trips.
- 4.19 The TS explains that the level of car parking proposed (17 spaces), while less than in the consented scheme (24 spaces), is sufficient to meet the operational requirements of Costa. There will be no overspill parking onto the adjacent highway as there are no opportunities to park on the highway, and the development is adjacent to and accessible on foot to the main retail park car park on the other side of Swansea Road. Planning Policy Wales (paragraph 4.1.51 states that planning authorities must support schemes which keep parking levels down, especially off street parking, when well designed.

- 4.20 The proposal includes 4 cycle parking spaces consistent with the cycle parking provision in the consented scheme. The proposal also provides EV charging facilities for 2 bays which was not a feature of the consented scheme.
- 4.21 As set out in the TS, the scheme has been designed to accommodate the delivery and refuse requirements of the operator.
- 4.22 The TS states that the majority of the trips to the proposal are anticipated to be secondary, either diverted from existing facilities, linked to a visit to the local area, or pass-by, and that the applicant is willing to accept a condition to implement a barrier down the centre of the adjacent highway to enforce the left-in / left-out arrangement, i.e. the same as that imposed on the consented scheme. As such the proposal will not have an adverse traffic impact.
- 4.23 The proposal complies with PPW and LDP Policies (including LDP Policy SW11(5) and SW12) in terms of highway and accessibility considerations.

Biodiversity

- 4.24 Planning permission P/23/0254 was supported by a Preliminary Ecological Appraisal which concluded that there are no ecological constraints to the development of the site.
- 4.25 The revised proposals are for a slightly smaller site which omits a strip of land on the south east border which will remain undeveloped. Consistent with the previous PEA, the revised PEA submitted with the current application concludes that there are no ecological constraints to the development of the site.
- 4.26 To achieve net benefit for biodiversity (NBB) in accordance with PPW and the recommendations in the PEA, the revised application includes a similar amount of landscaped area as the consented scheme and the proposed landscape scheme includes formal tree planting and ornamental shrub/groundcover planting consisting of native species. Further enhancement measures in the form of bat boxes can also be secured by planning condition consistent with Condition 10 in permission P/23/0254.

- 4.27 The proposal complies with PPW and LDP Policy EnW1 in terms of preserving and enhancing biodiversity.

Drainage

- 4.28 Condition 7 in planning permission P/23/0254 states that no surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network. The stated reason is to prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment in accordance with Policy EcW4 [sic] of the Merthyr Tydfil County Borough Council Replacement Local Development Plan. The relevant Policy is Policy EnW4.
- 4.29 Policy EnW4 states that development proposals will be required to demonstrate that they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment including from pollution of land, surface water and land stability and land contamination. Paragraph 6.6.39 notes that all new developments of more than 1 dwelling house, or where construction is 100 square meters or more, will require SUDs for surface water that meets the statutory sustainable drainage standards set by Welsh Government. Approval from the SUDs Approval Body (SAB) will be required before construction takes place.
- 4.30 The submitted Drainage Strategy (Burrows Graham, 2 August 2024) explains that the site is underlain by a thick layer of made ground associated with the spoil from the Cyfarthfa ironworks, mixed with suspected spoil from nearby coal and ironstone mining operations. Due to the existence of colliery waste, the use of infiltration on the development has been discounted.
- 4.31 There are also no watercourses or public surface water sewers in the vicinity of the site, so this discounts these as options for discharge.
- 4.32 Therefore, it is proposed to discharge surface water to the combined sewer to the south of the site at a restricted rates of 0.9 l/s. Due to the protection provided by the permeable construction, a 25mm orifice from the car park is proposed.

- 4.33 The Drainage Strategy also explains that SUDS will be utilised. This will incorporate source control using permeable paving in car parking bays and site control measures through the use of attenuation and flow control devices which are incorporated to control storm water for all rainfall events. An application has been made for SAB approval.
- 4.34 The submitted Drainage Strategy demonstrates that the proposed surface water drainage scheme will not result in hydraulic overloading of the public sewerage system, that the health and safety of existing residents will be protected, and there will be no pollution of or detriment to the environment. As such the application accords with Policy EnW4

Land Stability

- 4.35 In terms of land stability considerations under Policy EnW4, the Mining Investigation Report (GIS, February 2023) explains that the site is underlain by shallow mine workings which will be stabilised by undertaking a grid drilling and pressure grout operation in accordance with approval to be obtained from the Coal Authority.

Contamination

- 4.36 With regard to land contamination considerations under Policy EnW4, the Ground Investigation Report (GIS, May 2022) identifies that the site is underlain by a significant thickness of predominantly colliery waste materials. Testing of samples of the made ground found no contaminants of concern, including asbestos. The report recommends that no further assessment or remedial action is necessary with respect to the health of end users.
- 4.37 In terms of determining the suitability of the soils for disposal to landfill, the Report records that the made ground waste stream would be classified as “Non-Hazardous Waste”. In addition, no asbestos was detected in the samples of made ground tested. The Report concludes that made ground can be disposed of at an Inert Waste Landfill site.
- 4.38 In terms of ground gases, the Report states that no gas protection measures and no radon protection measures are required.

5. Summary & Conclusions

- 5.1 Planning permission for a 167sqm gross coffee shop with drive thru facility development was approved at the application site in 2019 and renewed in 2024. The Applicant has now agreed terms with Costa Limited, trading as Costa Coffee, to operate the proposed 167sqm gross coffee shop with drive thru facility and the current application has been submitted to secure consent for a revised layout and design that meets Costa's operational requirements.
- 5.2 Since obtaining the original permission in May 2019, economic circumstances have changed significantly, particularly due to the COVID-19 pandemic. This affected the Applicant's ability to secure a tenant, which is a prerequisite to progressing with the development. It is of significant economic benefit that Costa has now been secured as the tenant as approval of the current application will finally deliver the already accepted type of development on this vacant site and will generate 15 job opportunities for local people in a mix of full time and part time positions.
- 5.3 The revised proposals present a more efficient form of development that requires slightly less land take than the consented scheme. The current application site measures 0.16 hectares compared to the 0.17 hectare site that has planning permission. The reduction in site area is a result of omitting a strip of land on the south east boundary that will remain undeveloped.
- 5.4 The proposed building is a contemporary design with bold, clean lines using high quality materials and finishes, and includes tall shopfront windows to the front elevation that will allow views into the building and outwards light-spill towards the car park.
- 5.5 The proposed retaining wall adjacent to the public footpath on the south west boundary will be finished in grey stone, in keeping with the local material palette, including the nearby Cyfarthfa Castle.
- 5.6 Full details of the proposed building materials are provided on the submitted drawings which avoids the need for the materials condition in the existing consent (condition 4 in P23/0254) to be reimposed.

- 5.7 Full details of facing materials and structural calculations for the retaining wall have been submitted for approval to avoid the need for condition 6 in permission P/23/0254 to be reimposed.
- 5.8 The application includes details of the positions, height, design, materials and type of boundary treatment to be erected, including highway barriers within the site, in order to avoid the need for condition 8 in permission P/23/0254 to be reimposed.
- 5.9 The revised scheme includes the same high level of accessibility to no car borne traffic as the consented scheme, including pedestrian and cycle access from Swansea Road. Four cycle parking spaces will be provided which is the same amount as in the consented scheme.
- 5.10 There will be 17 car parking spaces which meets the operator's requirements for this site. This includes 2 spaces for blue badge holders and 2 spaces with EV charging facilities. EV charging was not provided in the approved scheme.
- 5.11 There will be no overspill parking onto the adjacent highway as there are no opportunities to park on the highway, and the development is adjacent to and accessible on foot to the main retail park car park on the other side of Swansea Road. Planning Policy Wales (paragraph 4.1.51) states that planning authorities must support schemes which keep parking levels down, especially off street parking, when well designed.
- 5.12 The proposed vehicular site access is in a similar position to that already approved and the Applicant is prepared to accept the same condition as in the consented scheme (condition 5 in P23/0254) to implement a barrier down the centre of the adjacent highway to enforce the left-in / left-out arrangement.
- 5.13 The proposed layout incorporates a similar area of landscaping as the approved development with a landscape design that includes formal tree and ornamental shrub/groundcover planting, consisting of native species, in accordance with the recommended biodiversity enhancements in the Preliminary Ecological Appraisal. Net benefits for biodiversity (NBB) will also include the provision of bat boxes the details

of which can be secured by condition as per condition 10 in the renewal permission P/23/0254.

- 5.14 The layout has been designed to accommodate a sensitive external lighting scheme that meets operational requirements and protects biodiversity. Details of external lighting can be submitted and approved separately as per condition 11 in P/23/0254.
- 5.15 The submitted Drainage Strategy explains that it is necessary to discharge surface water to the combined sewer. The drainage strategy includes SUDS, incorporating source control using permeable paving in car parking bays and site control measures through the use of attenuation and flow control devices which are incorporated to control storm water for all rainfall events. An application has been made for SAB approval.
- 5.16 The proposed surface water drainage scheme will not result in hydraulic overloading of the public sewerage system, will protect the health and safety of existing residents, and there will be no pollution of or detriment to the environment. Therefore, condition 7 in P23/0254, which stated that no surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network, should not be reimposed.
- 5.17 Overall, the revised proposal is consistent with the LDP and PPW and should be granted planning permission.

APPENDIX 1

Merthyr Tydfil Town Centre – Vacant/Marketed units August 2024

Address	Size	Assessment
Unit 2, Beacons Place	Ground – 103sqm First – 112sqm Total – 215sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 9, Beacons Place	Ground – 361sqm Total – 361sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 1A, Graham Way, St Tydfil Shopping Centre	Ground – 26sqm Total – 26sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 5, Graham Way, St Tydfil Shopping Centre	Ground – 135sqm Total – 135sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 9a, Graham Way, St Tydfil Shopping Centre (Under Offer)	Ground – 273sqm Total – 273sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 10, Graham Way, St Tydfil Shopping Centre	Ground – 109sqm Total – 112sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 10a, Graham Way, St Tydfil Shopping Centre	Ground – 475sqm Basement – 300sqm Total – 784sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Floorspace split over two levels would not provide suitable configuration for a coffee shop drive thru. Conclusion: not suitable
Unit 10b, Graham Way, St Tydfil Shopping Centre	Ground – 990sqm Basement – 460sqm Total – 1,450sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Would not provide suitable configuration for a coffee shop drive thru. Conclusion: not suitable
8 River Walk, St Tydfil Shopping Centre	Upper Floor Level – 1,021sqm Total – 1,021sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Would not provide suitable configuration for a coffee shop drive thru. Conclusion: not suitable
56 – 57 Glebeland Street	Ground – 82sqm Total – 82sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
30 – 31 Lower High Street	Ground – 71sqm Basement – 37sqm Total – 108sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable

47 High Street	Ground – 208sqm First – 140sqm Basement – 70sqm Total – 409sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
60 High Street	Ground – 94sqm Total – 94sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
118 High Street	Ground – 44sqm Total – 44sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
119 High Street	Ground – 177sqm Total – 177sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
12 Market Square (Under Offer)	Ground – 118sqm Total – 118sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
16/18 Market Square (under offer)	Ground – 247sqm Total – 247sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
2A New Market Walk, St Tydfil Shopping Centre	Ground – 310sqm Total – 310sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
2B New Market Walk, St Tydfil Shopping Centre	Ground – 44sqm Total – 44sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
1 – 7 New Market Walk, St Tydfil Shopping Centre	Ground – 370sqm Total – 370sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
10 – 11 New Market Walk	Ground – 237sqm Total – 237sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
7 Victoria Street	Ground – 42sqm Total – 42sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
8 Victoria Street	Ground – 132sqm Total – 132sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable

Source: LoopNet; Hutchings & Thomas; Cooke & Arkwright; EJ Hales; Calan; Lambert Smith Hampton