

Marvel Limited

Sequential Site Search

Rhydycar West (P/23/0065)

by CarneySweeney

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1.0 Introduction

- 1.1.1 This report addresses the search for sequentially preferable sites undertaken in respect of an outline application at Land To The South West Of The A470/A4102 Roundabout at Rhydycar West (LPA ref: P/23/0065) for:

“Outline application for erection of a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Water park (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), Outdoor Activity Centre, Hotel Accommodation (up to 418 bedrooms), Woodland Lodge accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure.”

- 1.1.2 Comments from the MTCBC Planning Policy and Implementation Section, dated 10 May 2023 draw attention to the requirement for a sequential test, noting that *“there is no actual assessment of any alternative site included [in the application]. Again, given the scale and nature of the proposals, a sequential test proportionate to the proposals would be expected.”*
- 1.1.3 Furthermore, it became apparent at a meeting on 4 October 2024 that the lead Policy Officer did not consider that a sequential search had been undertaken at all. This is incorrect and fails to take account of the information set out in section 4.2 of the Environmental Statement for example.
- 1.1.4 This statement, therefore, seeks to pull together and expand on the work undertaken to date.



2.0 Policy

- 2.1.1 For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area (Section 38 (4) of the Planning and Compulsory Purchase Act 2004 (as amended)).
- 2.1.2 The National Development Framework comprises “Future Wales: The National Plan 2040” (published February 2021). No strategic development plan exists for the area and the Merthyr Tydfil Replacement Local Development Plan 2016-2031 was adopted in January 2020. The Development Plan for the application site, therefore, comprises Future Wales and the Replacement LDP.

2.2 Future Wales

- 2.2.1 Policy 6 of Future Wales (Town Centre First) outlines the national planning policy approach in relation to the location of certain types of development. The policy states:

“Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region. A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.”

2.3 Merthyr Tydfil Replacement LDP

- 2.3.1 Policy EcW3 (Retail Hierarchy - Supporting Retailing Provision) states that Merthyr Tydfil town centre is the favoured location for retail, leisure, and other complementary development:

“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’. Proposals for new and enhanced retail, leisure and other complementary provision in all these centres will be permitted where they improve the vitality and viability of the centre(s) concerned.

Outside the above centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they



avoid causing harm to town/local centre vitality and viability.”

- 2.3.2 Supporting paragraph 6.7.30 states *“Consistent with the sequential approach, Merthyr Tydfil town centre as the largest centre would be expected to be the main focus for retail and leisure development given it has the best prospects for attracting in-centre investment from developers and multiple operators. It is also the most sustainable location for retail development, in terms of increasing access to services, facilities and public transport.”*

2.4 Material Considerations

- 2.4.1 Material considerations in respect of the sequential test comprise Technical Advice Note 4 (Retail and Commercial Development, November 2016) as well as relevant appeal and Court decisions regarding the test’s application in practice.

Technical Advice Note 4

- 2.4.2 TAN 4 notes that the sequential location of development plan allocations or planning applications should be considered in the following order:

- Firstly, within retail and commercial centres identified in the retail hierarchy. Local planning authorities should ensure that any ... planning application is of an appropriate scale in relation to the role and function of the centre.
- If no suitable sites are available in retail and commercial centres then edge-of-centre locations should be considered, with preference given to brownfield sites that are or will be well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport.
- Only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and then outside, a settlement area be considered. Where out of centre sites are concerned preference should be given to brownfield sites which are or will be well served by a choice of means of transport and are close to an established retail and commercial centre.

- 2.4.3 Paragraph 7.2 states that *“Suitability refers to a site or building’s attributes and whether these are sufficient to meet the development requirements of a particular proposal. Where a developer favours a development site on the edge of or outside a retail and commercial centre the developers will need to provide evidence to explain why potential sites or buildings within the centre are unable to accommodate the format, scale and design of a proposed development.”*



Relevant appeal and court decisions

- 2.4.4 A particularly relevant and reasonably recent appeal relates to a proposal by Great Lakes UK Limited against the decision of Cherwell District Council dated 11 May 2021¹ (known as “Great Wolf”). The proposal was to provide a new leisure resort incorporating a waterpark, a family entertainment centre, a hotel, conferencing facilities and restaurants with associated access, parking and landscaping. In determining the appeal, the Inspector considered whether the appeal site represented a locationally sustainable choice with specific reference to the sequential test, as set out in the National Planning Policy Framework, as applied in England. The Inspector notes:

“Criticism is levelled at the appellant’s approach of only looking at allocated sites. However, given the requirement of the sequential test is to look at town centre sites and then edge-of-centre sites it would be unusual that sites of the scale appropriate to accommodate the development, were not included in a relevant development plan. In that context the approach adopted by the appellant is reasonable and has demonstrated there are no sequentially preferable sites available. Moreover, there is, as far as I am aware, no requirement for the appellant to undertake an assessment of every piece of land within its likely catchment area on the basis that the development is essentially footloose and could go anywhere. Given the scale of the search area, that, in my view, would be manifestly unreasonable.” (paragraph 69) (underlining added)

“Taken in the round, with the package of transport measure proposed, the proposed development would, given its nature, be in a location that can be made locationally sustainable. In this context the proposal would not conflict with the objectives of Policy SLE 3 or the Framework.” (paragraph 73)

- 2.4.5 Numerous other appeal precedents and case law relate to the application of the sequential approach, as follows:
- For a sequentially preferable site to be suitable, it must be “suitable for the development proposed by the applicant.” The “whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer.” (Dundee², paras 24 and 38);

¹ APP/C3105/W/20/3259189 “Great Wolf”

² Tesco Stores Ltd v. Dundee City Council [2012] UKSC13



- *“to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer.”* (Dundee, para 28). The relevant question to ask is *“whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.”* (Dundee, para 29). Accordingly, the application of the sequential test is *“for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.”* (Dundee, para 38);
- *“The policy concerning the sequential approach... must be applied in a manner which complies with the legally binding case law on the meaning of the sequential approach. Plainly the case in question (Dundee) is of seminal importance”* (Rushden Lakes³, para 8.44);
- *“There is no longer any such [disaggregation] requirement stated in the NPPF. [The NPPF] cannot be read so as to imply that a major, and extremely controversial, part of previously stated national policy lives on by implication in the NPPF. Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF.”* (Rushden Lakes, para 8.47). *“there is no requirement to disaggregate”* (SoS decision letter for Rushden Lakes, para 16);
- *“both applicants and local planning authorities are expected to ‘demonstrate flexibility on issues such as format and scale’. What bounds can reasonably be set on an applicant’s preference and intentions as to ‘format and scale’ in any individual case will always, and necessarily, depend on the facts and circumstances of that particular case. The policy in paragraph 24 of the NPPF should not be seen as prescriptive in this respect. It plainly is not”.* (Warners Retail High Court judgement⁴, para 30)
- *“In carrying out the sequential test it is acknowledged that whilst Framework paragraph 24 indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme. The sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites. There is nothing in the evidence before me to suggest that the applicant has pitched the scale of the scheme so that would be impossible to identify a town centre site”* (para 11.7 of Inspector’s Report, Scotch Corner called-in application⁵). The SoS specifically agreed with the Inspector at IR11.7 (para 11 of his decision letter).d

³ APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014

⁴ Warners Retail (Moreton) Limited v Cotswold District Council [2016] EWCA Civ 606

⁵ APP/V2723/V/15/3132873 and APP/V2723/V/16/3143678



- The Inspector's Report of The Mall, Cribbs Causeway call-in decision⁶ noted at paragraphs 567 and 568 that:

"There was debate at the inquiry about whether proposals should be split into different parts so that they can be accommodated on several town centre sites. Whereas past retail policy and guidance has adopted a disaggregation approach this is not embodied in either the Framework or the PG as was confirmed by the Court of Appeal in Warners Retail. The Secretary of State reached a similar conclusion in his decisions on Rushden Lakes, Scotch Corner and Honiton Road. Whilst the Inspector in the Kingswood, Hull appeal decision did endorse a disaggregated approach this seems to have been influenced by a wording of the relevant policy and the availability or [sic] two allocated sites."

"In the Tollgate Village case the Inspector did consider that there was scope for disaggregating the proposals and spreading them onto different sites, even though ultimately such sites were found not to be available. However, the findings here were case specific and it is noted that they were not specifically endorsed by the Secretary of State in his decision. As a general principle an approach that involves disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above. The town centre uses in the application proposals would comprise the retail and leisure uses and to divide them up would change the broad nature of the development in this case."

2.4.6 While it is recognised that the above court and appeal references relate to areas outside of Wales, the nature of the sequential test is broadly consistent across England, Wales and Scotland. Just as the Supreme Court decision in the Dundee case had clear relevance in England, so too does that decision and the referenced English appeal decision have relevance in Wales. Indeed, against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5:

"To maximise the opportunities for new development in centres, developers and retailers will need to be more flexible and innovative about the format, design and scale of proposed development and the amount of car parking, tailoring these to fit the local circumstances. Rather than propose developments with a mixture of large-scale retail and/or leisure uses and a large amount of car parking which can only be accommodated at single site out-of-centre or even out-of-town locations, developers

⁶ APP/P0119/V/17/3170627



are expected to demonstrate why they could not develop elements of the larger scheme on a site, or a number of sites, in more central locations with less car parking.”

- 2.4.7 This wording, which required disaggregation of elements of a scheme onto multiple sites was removed from PPW version 9 and all subsequent versions of PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). Had the Welsh Government wanted developers to adopt a disaggregation approach, it could and would have done so by adding a simple statement to that effect into PPW. It is clear, therefore that disaggregation is not a policy requirement.
- 2.4.8 What would be a reasonable and appropriate level of flexibility will depend on the particular circumstances of the sequential site and the proposals that it is being expected to accommodate (see The Mall, Cribbs Causeway appeal). For a site to be preferable it must be suitable and available for the broad type of development which is proposed in the application by approximate size, type, and intended purpose. It is recognised that the current application is in outline, however, the commercial input into the development from existing operators clearly shows the commercial requirements for co-locating the Indoor Snow Centre, Indoor Waterpark, other leisure uses and the accommodation on a single site to operate as a single ‘all year round’ resort (see below). Fundamentally, the test is to be applied in a real world context (see Dundee decision).



3.0 Operator Requirements

- 3.1.1 As set out in the Environmental Statement, to comprehend the potentially suitable alternative site location options, it is first essential to understand the basic requirements of the proposals from the operators as well as from Snowsport Cymru Wales and GB Snowsport.
- 3.1.2 Detailed discussions have already been undertaken with potential experienced operators of the proposed snow anchored resort that currently operate attractions both in and outside the UK. The operations model will provide an extensive range of leisure, tourism, activity and sporting facilities within a resort complex. The UK has been identified as a key unserved market for this type of indoor snow centre as none exist in the UK. The demand for such a facility in the UK is well evidenced, as summarised below.
- 3.1.3 The UK ski holiday market alone is worth £2.9 billion⁷, with around 4 million active skiers – 2 million of which travel abroad for ski holidays on an annual basis. Popular destinations for skiers from the UK include France (55% of trips), Austria (26% of trips), Italy (18% of trips) and Switzerland (13% of trips)⁸. According to the Ski Club of Great Britain⁹, average expenditure per head for a week's skiing stands at £1,335, 70% of which is spent on travel, accommodation and passes, with the remaining 30% spent on in-resort entertainment, dining and retail. The Ski Club of Great Britain Consumer Research 2019 study found that the most important non ski related driver for destination was overall travel time. This suggests that having a stronger domestic ski offer could boost the number of domestic visitors. Furthermore, with 77% of travel to ski holidays taken by plane¹⁰, changing travel habits in line with reduced flying as people look to reduce their carbon footprint may also boost a domestic offer. The demand picture is further bolstered by a report by Mintel¹¹ which surveyed attitudes towards skiing in the UK, which noted that 30% of respondents interested in taking a ski holiday, 25% would be interested in taking a snow sports holiday in a trip within the UK. Moreover 33% of people interested in taking a snow sports holiday would like to practice/learn on an artificial/indoor slope in the UK before going. For further information please see the submitted Strategic Economic Benefits Report.
- 3.1.4 The facility is supported by GB Snowsport and Snowsport Cymru Wales to establish the UK National Centre of Snowsport Excellence and will be the official home and training headquarters for the Welsh and GB national and Olympic and Paralympic snow sports teams

⁷ The British Ski Holiday Market, LHM Marketing, 2019.

⁸ State of the Snowsports Market Consumer Research May 2022

⁹ Ski Club of Great Britain Consumer Research 2019

¹⁰ State of the Snowsports Market Consumer Research May 2022

¹¹ Mintel UK Skiing and Snowboarding Market Report



and elite athletes. It will be based on similar successful facilities in Europe, such as SnowWorld at Landgraaf (Netherlands), Neuss (Germany) and Alpincenter at Bottrop (Germany). The snow centre will be built to FIS (International Ski Federation) specification, enabling the venue to host regional, national, and international competitions together with international team training. The snow centre itself is estimated to generate c. 750,000 visitors per annum and will comprise the UK's largest multi-slope and freestyle snow park (including extensive beginners' slopes and children's fun play area).

3.1.5 The proposals will incorporate a hotel resort complex of varying different service levels (i.e. value through to premium) and will comprise on-site restaurants, spa facility and potentially, a location for events. In terms of other leisure facilities, the scheme will provide indoor/outdoor water park and indoor/outdoor activity centre. Likewise, up to 30 woodland lodges are proposed. In addition, the resort will have events space for c.150 people catering for conferences, corporate and other private events. In total, the proposals are expected to generate a need for 842 direct Full Time Equivalent employees across the various elements of the resort, and therefore will require a readily available employee base within commuting distance of the elected site. This does not take into account indirect full time employment opportunities and ripple effects which will be significant.

3.1.6 Any main town centre uses such as on site restaurants or gift shop proposed will remain ancillary to the tourism / leisure offer and will not be a destination in their own right. In this regard, it is noted that when considering the Afan Valley Adventure Resort in Croeserw Cymmer for 600 lodges/apartments, 100-bed hotel with spa, central plaza comprising restaurants, leisure activities and shops, adventure activities (including X-sports, alpine/ski, forest activities) and other restaurants (P2018/0493) which was granted on 18 January 2022, a similar position was taken by Neath Port Talbot officers, stating:

"The proposed town centre uses – such as restaurants and cafes, some retail floorspace and a single screen cinema – would be ancillary to the leisure function of the Resort and will not be a destination in their own right".

3.1.7 Likewise, in the Rushton Lakes decisions the Inspector noted that *"it is illogical to suggest that shoppers at Rushden Lakes wanting somewhere to eat and drink should be directed to restaurants at Northampton and Kettering."*

3.1.8 Notwithstanding the existing provision of snowdomes in and across the UK including Castleford, Manchester, Tamworth, Milton Keynes and Hemel Hempstead, according to GB Snowsport and Snowsport Cymru Wales there is no suitable existing provision to accommodate the Welsh and GB Olympic and Paralympic snow sport team's training requirements and a wider resort complex necessary to deliver the slope viably anywhere in



the UK. GB Snowsport and Snowsport Cymru Wales currently travel to Europe and as far afield South America and New Zealand to meet their training requirements. None of the existing or proposed facilities in the UK can meet FIS standards and requirements nor do they provide suitable ancillary facilities. As such, the prospective operators, GB Snowsport and Snowsport Cymru Wales have sought to identify suitable locations in the UK for the provision of an indoor snow centre to accommodate this identified need.

- 3.1.9 The facilities considered included sites in London, Manchester and Edinburgh, all of which had insufficient site size, insufficient maximum slope length and an inability to provide additional resort facilities to provide an attractive year round destination.
- 3.1.10 Likewise, Snowsport Cymru Wales (SCW) and GB Snowsport have been seeking a UK base for their training operations due to the extent of their use of indoor facilities outside of Wales and the UK. Travel abroad for training (especially for extended periods) gives rise to substantial associated costs and stress for able bodied and para sport athletes meaning they have difficulty hitting their 'snow time' targets. The existing facilities within the UK are not comparable to and substantially inferior to those in Europe which means they are not capable of hosting FIS competitions due to not meeting the FIS requirements.



4.0 Quantitative and Locational Scheme Parameters

4.1.1 The scheme parameters from a quantitative and locational perspective are set out below:

4.2 Essential

- A site of c. 25-30 ha which is available for development within a short timeframe (the need for the facility being now/overdue);
- To be within acceptable travel-time of target population by multiple modes;
- Good connectivity to a train station for onward transit;
- Good links to key major road networks;
- Compatible with neighbouring land uses (i.e. no sensitive neighbours);
- To be co-located or proximate to other 'adventure sports' facilities to allow for linked trips and to benefit from existing customer base profile;
- Favourable topography to support design requirements and configuration of a predominantly ground supported functional ski-slope (i.e. an area with a minimum gradient of approximately 1:5 to accommodate the ski slope);
- Sufficient space and technical specifications to provide an FIS compliant length slope and sufficient ancillary accommodation required to host international events;
- Existing or potential to provide suitable servicing infrastructure requirements (water, drainage, sewerage, electric, gas, telecoms and broadband);

4.3 Desirable

- Woodland environment to provide an appropriate natural environment for the snow centre, outdoor leisure and lodge elements;
- Regeneration / socio-economic benefits – a key aspiration is to ensure the proposals offer a range of new skilled and unskilled job opportunities in an area of high unemployment / deprivation;
- Sufficient space to provide a slope length of c.400m length with appropriate topography to provide vertical drop of 80 metres to achieve the 1:5 slope required.



4.3.1 The resort development necessitates a site physically able to accommodate the following key elements, across c. 20 ha of land:

- Indoor Snow Centre – 2.8 ha
- Indoor Tropical Water Park – 0.49 ha
- Hotel Accommodation including:
 - The Luxury Spa Wing – 0.13 ha
 - Sports and value hotel – 0.14 ha
 - Resort hotel – 0.49 ha
- Indoor Adventure Centre – 0.58 ha
- Outdoor Adventure Centre – 0.15 ha
- Woodland Lodges – 3.2 ha
- Associated roads, parking, piazza and landscaping – 12.65 ha

4.3.2 Notwithstanding the above references to required site size, the sequential site search has shown very considerable flexibility in reviewing sites of 4.5ha for the core elements of the scheme only.



5.0 Alternative Location Search

- 5.1.1 Investigations have confirmed that there is a clear deficit of indoor snow centre facilities in the South Wales market. Whilst hybrid planning permission was granted in June 2013 for mixed use development within Cardiff International Sports Village, which included the provision of a ski slope measuring c. 75 m high and c. 250 m in length (ref: 12/01861/DCI) (as renewed by virtue of the Section 73 application ref: 16/00006/MJR), the proposals have not yet been delivered to date due to viability concerns. Indeed, the most recent attempt to renew the permission, submitted in 2019 under reference 19/01343/MJR, has stalled and is yet to be determined while Cardiff Council is now consulting on developing the site without the ski facilities, focussing instead on cycling/velodrome provision. Note that this proposed indoor snow centre would not be capable of FIS certification so could not be comparable to the facility being propose at Rhydycar. In comparison, it is considered that the comprehensive nature of the Rhydycar proposals, i.e. including various leisure / tourism elements which underpin the viability will play a key role in securing the delivery of the proposals.
- 5.1.2 Notwithstanding deficit of indoor snow centre facilities in the South Wales market, MTCBC Policy Officer suggested that the search of a suitable and preferable site ought to encompass the whole of Wales. PPW notes that *“The nature of a proposed use is likely to determine what type of centre (i.e. higher or lower order centre) is most appropriate as a starting point for the sequential approach process”* (para 4.3.21).
- 5.1.3 Furthermore, in line with the Great Wolf appeal decision referenced above *“it would be unusual that sites of the scale appropriate to accommodate the development, were not included in a relevant development plan. In that context the approach adopted by the appellant is reasonable and has demonstrated there are no sequentially preferable sites available. Moreover, there is, as far as I am aware, no requirement for the appellant to undertake an assessment of every piece of land within its likely catchment area on the basis that the development is essentially footloose and could go anywhere. Given the scale of the search area, that, in my view, would be manifestly unreasonable.”*
- 5.1.4 In order to be within acceptable travel-time of target population by multiple modes to facilitate staffing of the resort, this assessment has focussed on centres with a population size equivalent to Merthyr Tydfil or larger, as follows. It is these centres we have focussed on in the following **Appendices 1-10**:

Cardiff	348,535
Swansea	170,085
Newport	130,890



Barry	56,605
Bridgend	51,760
Cwmbran	47,090
Wrexham	44,785
Llanelli	42,155
Neath	40,730
Merthyr Tydfil	39,535



6.0 Conclusions

- 6.1.1 Development of a scheme of this nature has the potential for significant positive economic and reputational effects. Cardiff, Swansea, Newport, Barry, Bridgend, Cwmbran, Wrexham, Llanelli, Neath and Merthyr Tydfil have been examined for sequentially preferable sites in **Appendices 1-10**. No suitable viable and available sequentially preferable site exists.
- 6.1.2 The Rhydycar West application site is the preferable location for the resort. Given Merthyr Tydfil's socio economic situation (see Chapter 5 of the submitted Environmental Statement), it is considered to be a location where the benefits of the scheme could also have the biggest positive impact.
- 6.1.3 In summary, the application site:
- Has received no objections to the planning application from Welsh Government and Statutory Consultees.
 - Is served by two rail stations; Merthyr Tydfil and Pentre Bach (c.1km and c.1.2km distant respectively) and a bus station. A free shuttle bus service to Merthyr Tydfil train station, bus station and town centre forms part of the scheme (for staff and visitor use);
 - Offers good connectivity to major road networks i.e. A470/A465/M4 corridor;
 - Lies close to centres of population and would support the South Wales economy with Merthyr Tydfil lying equidistant to the three main South Wales cities of Swansea, Cardiff & Newport (all within 30-40 miles driving distance) and likewise the central Valleys communities;
 - Is of an appropriate size to accommodate an FIS compliant indoor snow centre and all necessary ancillary accommodation and facilities to host competitions and provide a year round resort;
 - Has appropriate topography to accommodate the approximately 1:5 slope required, albeit with some cut and fill being required;
 - Is available for development immediately;
 - Is compatible with the surrounding land uses and does not raise any objection regarding impact on sensitive land uses;
 - Is set within a green and wooded environment;
 - Whilst there are known environmental constraints within and close to the application site (namely the SSSI, SINC and SAMs), the precise red line boundary has been chosen to minimise impact, such that it is considered the impact on such designations will be overcome by virtue of appropriate mitigation and management creating a net benefit. This has been confirmed by the absence of any objections from statutory consultees;

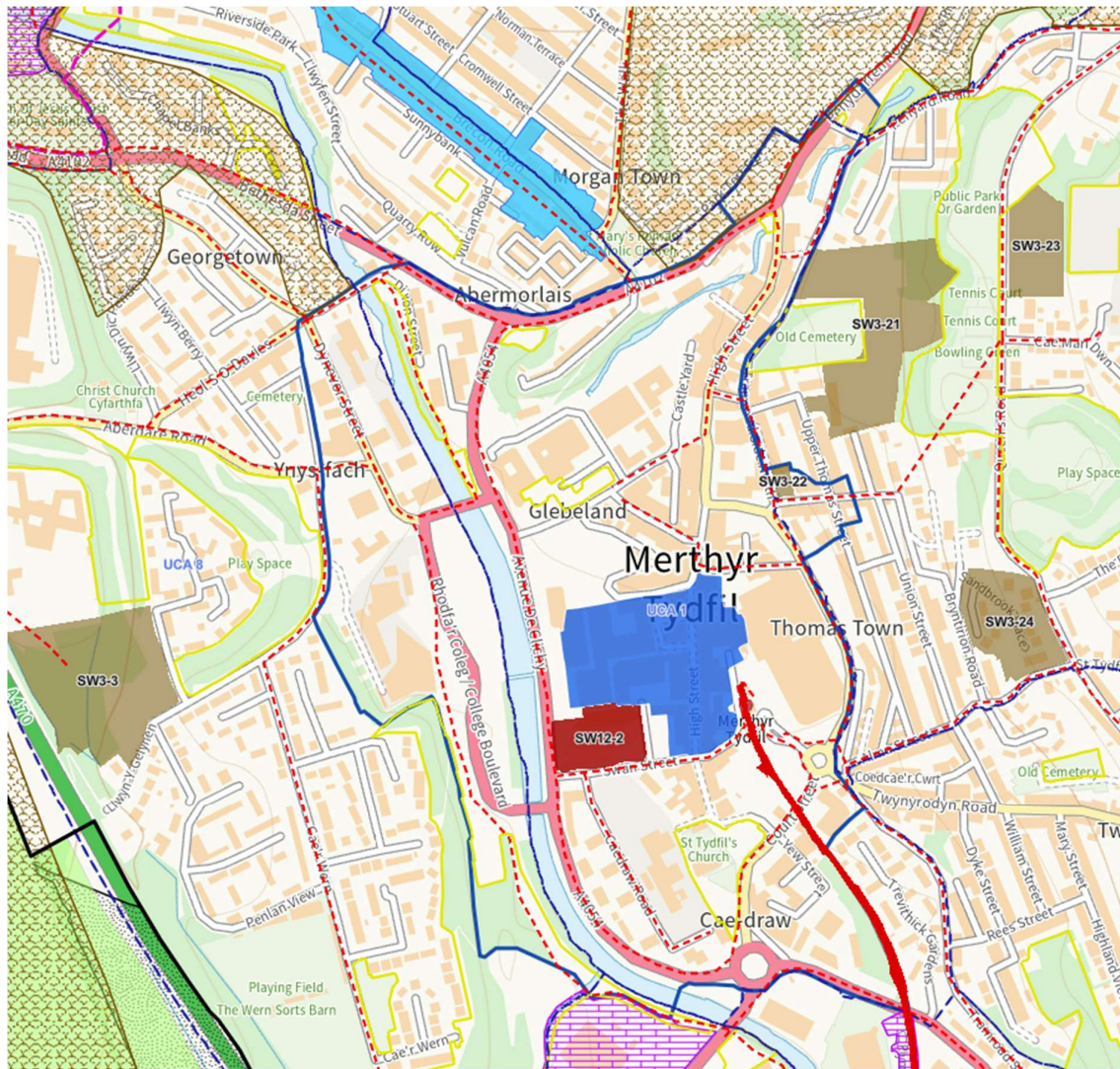


- Lies near adjacent to Bike Park Wales, and proximate to South Wales Zip World Tower and Bannau Brycheiniog National Park;
- Will allow for the beneficial remediation of a site with on-site coal mining and highways legacy;
- In view of the findings of the Welsh Index of Multiple Deprivation which confirms that Merthyr Tydfil has the second highest proportion of 'most deprived' areas in Wales, behind Blaenau Gwent – there exists significant opportunity for the proposals to result in extensive regeneration and socio-economic benefits to the Merthyr Valleys communities, through various means including the creation of new jobs, spin-off investment and trade in existing facilities and services and through community initiatives at the Resort itself. As set out above, this socio-economic regeneration could not be delivered in Merthyr Tydfil town centre.

6.1.4 The proposed leisure resort development with indoor snow centre on the Rhydycar West site would address the identified need within South Wales and take advantage of the connectivity to the wider outdoor activity market in the surrounding area. A policy compliant sequential test has been carried out.



APPENDIX 1 – MERTHYR TYDIL



The Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation alone have a footprint of over 4.5 hectares. A 4.5ha square would measure 212m x 212m, as shown indicatively below.



The entire Merthyr Tydfil town centre area (blue line) measures 45.9ha. The primary Shopping Area (blue shading) measures 3.1ha. Accordingly, the site required for just the Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation is approximately 10% of the area covered by Merthyr Town Centre and almost 1.5 times the Primary Shopping Area. The site required for the leisure resort development (which requires a site of c.20ha) is almost 6.5 times the primary shopping area and almost half the size of the entire town centre area.

No such site exists within the town centre (the largest collection of vacant units/sites being towards the north of the Centre where High Street becomes Pontmorlais, but with this combined vacancy being less than a tenth of the area required).

Looking outside of the town centre, site allocations are listed in Appendix 1 of the LDP. There are none which come close to the application site size, however, sites which satisfy the flexible area requirement of 4.5ha are as follows:

SW3.1 – Hoover Factory Site

While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. Furthermore, the site forms the key regeneration of the LDP, including its largest housing allocation (440 dwellings) and described as being “integral to success of the LDP strategy”. As such, the site is not available for the proposed development or suitable in respect of its topography.

SW3.7 – South of Castle Park

Large enough to accommodate the core elements of the development but itself in an out of centre location and served by residential roads and with no road-side presence from surrounding main roads. As a housing allocation it cannot be considered suitable for the leisure scheme proposed. The site is not, therefore, suitable or sequentially preferable.

SW3.18 - Twynyrodyn

As for the site above, this site is large enough to accommodate the core elements of the development but itself in an out of centre location. It, therefore, is not sequentially preferable. It is also served by residential roads and has no road-side presence from surrounding main roads. As a housing allocation it cannot be considered suitable for the leisure scheme proposed. The site is therefore not suitable or sequentially preferable.

SW3.20 - Bradley Gardens 2, Penyard

Again, this site is large enough to accommodate the core elements of the development but itself in an out of centre location and so is not suitable or sequentially preferable. As a housing allocation it cannot

be considered suitable for the leisure scheme proposed. The site is therefore not suitable or sequentially preferable.

SW3.29 – Project Riverside, Merthyr Vale

SW3.32 – Adjacent to Manor View, Trelewis

SW3.33 – Stormtown, Trelewis

These sites are located outside of the town Merthyr Tydfil, far from the principle designated centre where policy EcW3 confirms as the appropriate location for significant development such as that proposed. They are all housing allocations which cannot be considered suitable for the leisure scheme proposed. The sites are therefore not suitable or sequentially preferable.

EcW1.2 – Goatmill Road

This site is large enough to accommodate the core elements of the development but itself in an out of centre location and so is not suitable or sequentially preferable. As an employment allocation it cannot be considered suitable for the leisure scheme proposed. The site is therefore not suitable or sequentially preferable.

EcW1.3 – Ffos y Fran

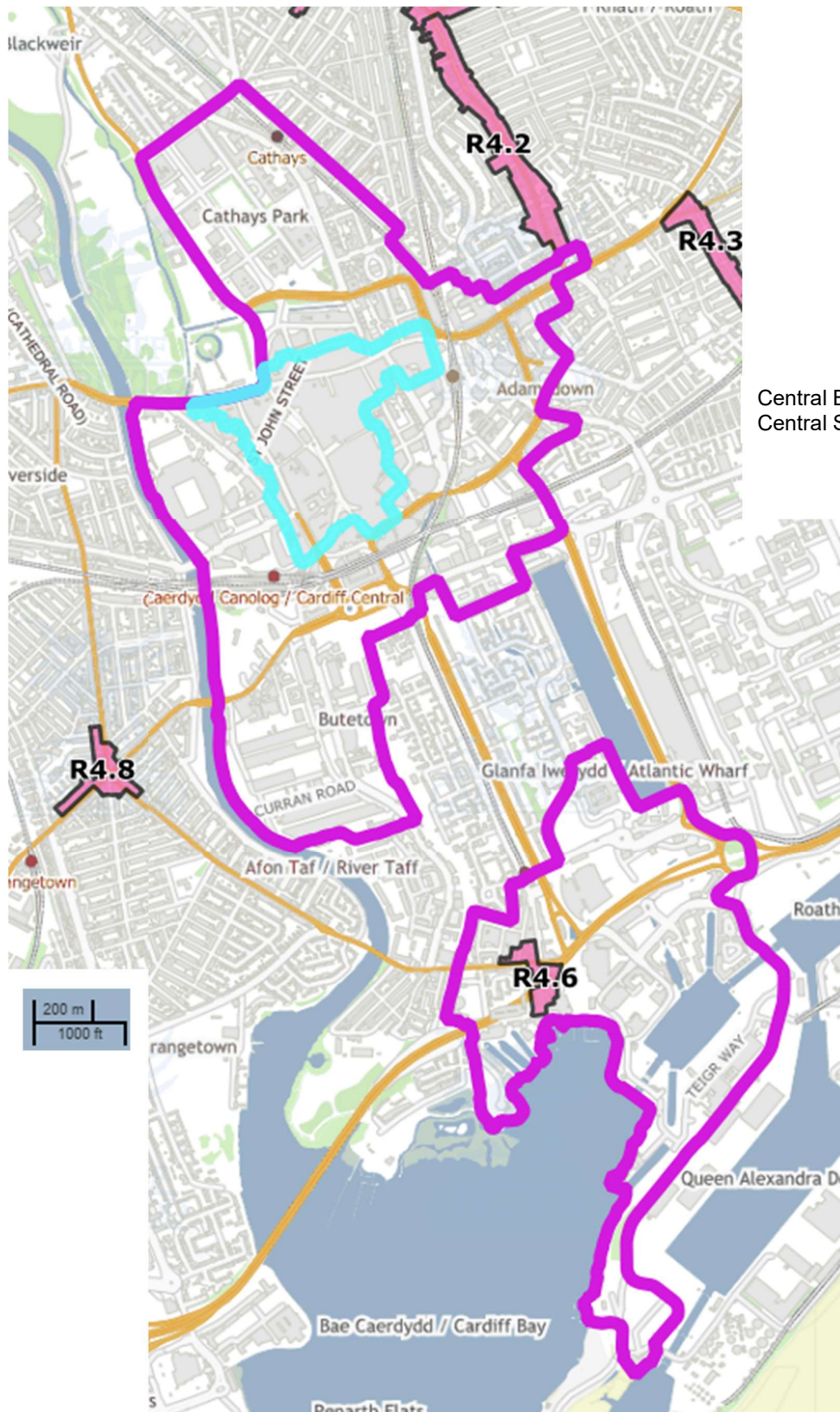
This site is large enough to accommodate the core elements of the development but itself in an out of centre and inaccessible location by non-car modes. It is not suitable or sequentially preferable. As an employment allocation it cannot be considered suitable for the leisure scheme proposed. The site is therefore not suitable or sequentially preferable.

Conclusion

Even taking a very flexible approach there are no sites in Merthyr Tydfil which could accommodate even the core elements of the proposed development (leaving aside necessary parking, servicing and landscaping etc). The Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation alone have a footprint of over 4.5 hectares – an area approximately 10% of the area covered by Merthyr Town Centre. No such site exists.

Furthermore, the site would have to be suitable for the nature and form of the development which, even allowing for flexibility, would have to accommodate appropriate access, the slope required for the Indoor Snow Centre and a natural environment, as required for a resort of this nature. There are simply not sites within or on the edge of the town centre which are large enough or which meet these requirements. All this being the case, no suitable viable and available sequentially preferable site exists.

APPENDIX 2 – CARDIFF



Central Bay Business Area (Purple)
Central Shopping Area (Blue)



The Cardiff LDP contains eight strategic allocations, all of which are of a size sufficient to accommodate the development and thus warrant further consideration:

Ref	Site	Size	Comment
A	Cardiff Central Enterprise Zone and Regional Transport Hub	78.8	Major employment-led allocation including a Regional Transport Hub together with other mixed uses in Cardiff city centre in order to fulfil Cardiff's role as economic driver of the city-region, provide major employment opportunities focused on financial and business services and maximise the advantages of its location adjacent to the Central Station and Cardiff Bus Station. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. The site is also flat. As such, the site is not suitable or available.
B	Former Gas Works, Ferry Road	9.9	Housing-based scheme of 500 homes and other associated community uses. As a strategic housing allocation it cannot be considered suitable or available for the leisure scheme proposed. The site is also flat and so unsuited for the snow centre development. As such, the site is not suitable or available.
C	North-West Cardiff	346	Comprehensive development of approximately 5,000 homes within the Plan period including employment and other associated community uses. As a strategic housing allocation it cannot be considered suitable or available for the leisure scheme proposed. The site is also largely flat with insufficient slope to support the snow centre. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
D	North of Junction 33 on M4	106	Mixed use of approximately 2,000 homes, employment, other associated community uses and a strategic park and ride site. As a strategic housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Indeed, the residential development is well under way, further underscoring the unavailability of the site. The site is also largely flat with insufficient slope to support the snow centre. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.

E	South of Creigiau	35	Housing-based scheme of approximately 650 homes representing a southern extension of the existing village. As a strategic housing allocation it cannot be considered suitable or available for the leisure scheme proposed. The site is also largely flat with insufficient slope to support the snow centre. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
F	North-East Cardiff	237	Comprehensive development of approximately 4,500 homes, employment and other associated community uses. As a strategic housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Indeed, the residential development is well under way, further underscoring the unavailability of the site. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
G	East of Pontprennau Link Road	80.7	Housing-based scheme of approximately 1,300 with associated community uses. As a strategic housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Indeed, the residential development is largely complete, further underscoring the unavailability of the site. The site is also largely flat with insufficient slope to support the snow centre. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
H	South of St Mellons Business Park	100	Strategic employment site, the subject of a current application called into the Welsh Ministers. As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Being the subject of a live and extensively progressed application further underscores its lack of availability. The site is also largely flat with insufficient slope to support the snow centre. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.

None of the non strategic housing allocations are large enough to accommodate even just the Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation (4.5ha), as set out below:

H1: NON-STRATEGIC HOUSING SITES

The following non-strategic sites are allocated for housing:			
Table 3: SUMMARY OF NON-STRATEGIC HOUSING SITES			
Site Ref.	Site Name	Estimated Units	Site Size (Ha)
H1.1	Land at Areas 9-12, St Mellons	150	3.98
H1.2	Land rear of Clive Street	80	2.87
H1.3	Rookwood Hospital	90	3.40
H1.4	Former Lansdowne Hospital	75	1.51
H1.5	Land at Dan-y-Garth, Penttyrch	47	2.49
H1.6	Land at former St John's College	64	2.50
H1.7	Ely Bridge Farm, Dyfrig Road, Ely	41	0.72
H1.8	Electrocoin Automatics Ltd, Caerphilly Road	20	0.61
H1.9	Land at Mill Road, Tongwynlais	5	0.40

The only non strategic employment allocation, Land at Maindy Road, Cathays is also too small at just 3.3ha.

APPENDIX 3 – SWANSEA

Strategic Development Areas – Sites A-L

RC3 Swansea Central Area Retail Centre

INSET MAP

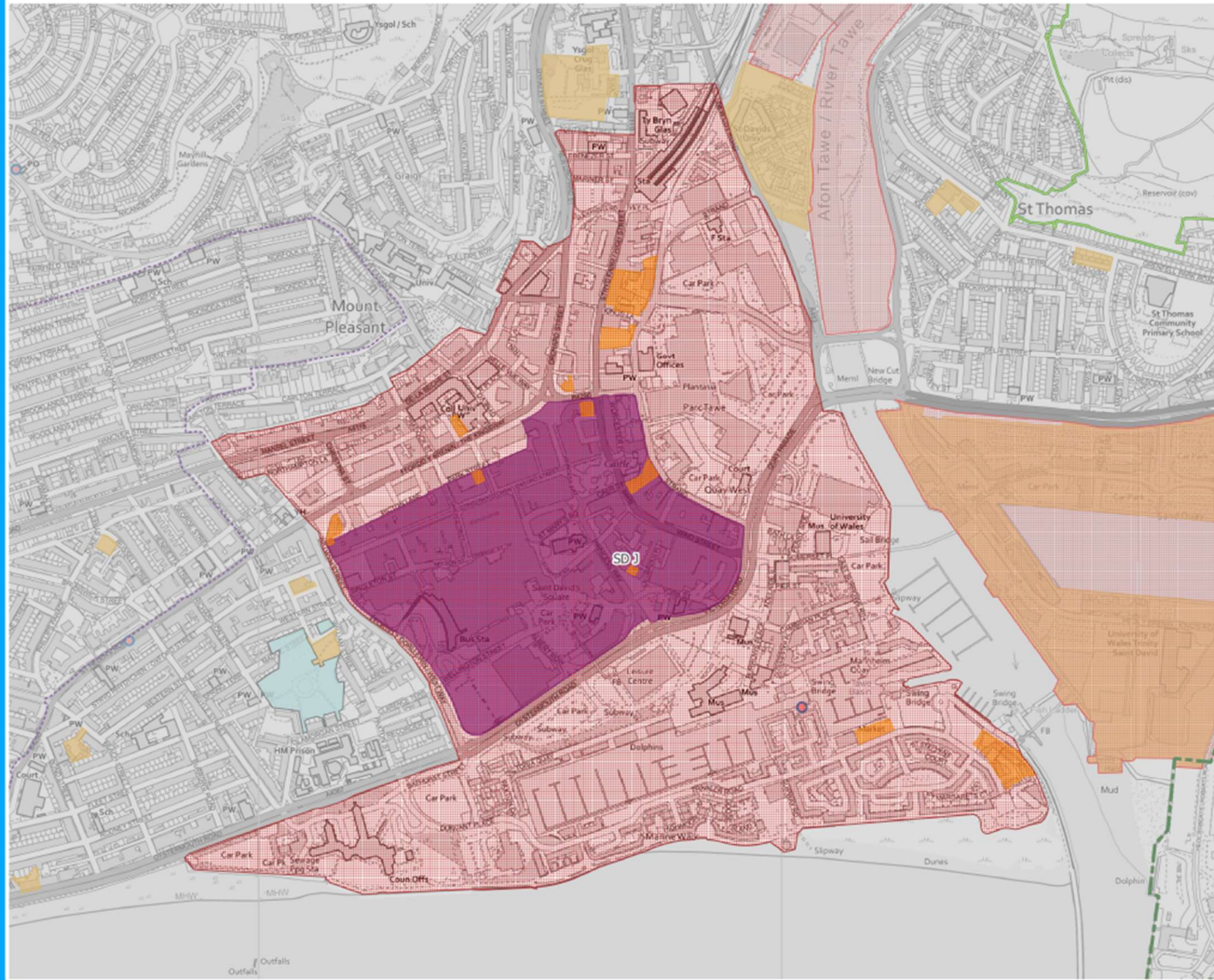


Scale 1:14000

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19 - Swansea Central Area



The Swansea LDP contains 12 strategic allocations, all of which are of a size sufficient to accommodate the development and thus warrant further consideration:

Ref	Site	Size	Comment
A	South of Glanffrwd Road, Pontarddulais	26	Site A is allocated for a comprehensive, residential led, development of circa 486 homes during the Plan period, incorporating a Primary School, leisure and recreation facilities, public open space and appropriate community facilities, employment and commercial uses. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises open space associated with the residential development. Being the subject of a live and extensively progressed application further underscores its lack of availability. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
B	North of Garden Village	50	Site B is allocated for a comprehensive, residential led, development of circa 700 homes during the Plan period, incorporating a Primary School, leisure and recreation facilities, public open space and flexible units for local facilities and commercial uses. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises open space associated with the residential development. The site has planning permission approved with conditions being actively discharged, which further underscores its lack of availability. Furthermore, the site is out of centre. As such, the site is not suitable, available or sequentially preferable.
C	South of A4240, Penllergaer	50	Site C is allocated for a comprehensive, residential led, mixed use development of circa 644 homes during the Plan period, incorporating Primary School, leisure and recreation facilities, public realm, public open space and appropriate community and commercial uses. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises open space/allotments associated with the residential development. The site has planning permission approved with conditions being actively discharged, which further underscores its lack of availability. Furthermore, the site is out of centre. As such, the site is not suitable, available or sequentially preferable.



D	West of Llangyfelach Road, Penderry	114	Site D is allocated for a comprehensive, residential led, development of circa 1,088 homes during the Plan period, incorporating a mix of low-medium and high density residential, a new local centre with commercial units, Primary School, a mix of public realm, open space, play provision and a new community building. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The site has planning permission approved with conditions being actively discharged, which further underscores its lack of availability. Furthermore, the site is out of centre. As such, the site is not suitable, available or sequentially preferable.
E	North of Clasemont Road, Morriston	24	Site E is allocated for a comprehensive, residential led, development of circa 490 homes during the Plan period, incorporating a Primary School, leisure and recreation facilities, public open space and appropriate community facilities and commercial uses. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises 'restricted access greenspace associated with the residential development. The site is the subject of recent EIA screening and scoping opinions for development pursuant to the allocation, which further underscores its lack of availability. Furthermore, the site is out of centre. As such, the site is not suitable, available or sequentially preferable.
F	Cefn Coed Hospital, Cockett	32	Site F is allocated for a comprehensive residential led, mixed use development of circa 371 homes during the Plan period, incorporating leisure and recreation facilities, public open space and retained health facilities. As a strategic housing led mixed allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises 'public access greenspace associated with the residential development. The site is within NHS ownership and current use, with aspirations for continued mental health serviced delivery from a significant part of the site, which further underscores its lack of availability. Furthermore, the site is out of centre with relatively poor accessibility. As such, the site is not suitable, available or sequentially preferable.



G	Northwest of M4 J46, Llangyfelach	200	Site G is allocated for a comprehensive mixed use development of circa 565 homes, incorporating a mix of low-medium and high density residential, a new local centre with commercial units, Primary School, a mix of public realm, open space and play provision, new community buildings, and a strategic business park with 14 hectares of potential development areas that could accommodate appropriate B1 and B2 uses. As a strategic housing and employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site is in Welsh Government ownership, which has stretching targets for housing delivery. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
H	North of Waunarlwydd/ Fforestfach	150	Site H is allocated for a comprehensive mixed use development of circa 716 homes during the Plan period, incorporating public realm, a Primary School, commercial units, community buildings and a Regional Employment Site with 26 hectares of potential development areas that could accommodate appropriate B1, B2 and B8 uses. As a strategic housing and employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the eastern part of the site is the subject of a recent EIA screening opinion for residential development pursuant to the allocation, which further underscores its lack of availability. Furthermore, the site is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
I	Swansea Vale	190	Site I is allocated for a comprehensive, residential led, mixed use development of circa 410 homes during the Plan period, and the completion of the Swansea Vale business park for commercial and employment use with 4 hectares of potential development areas that could accommodate appropriate B1 and B2 uses, with appropriate leisure uses. As a strategic housing and employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. The associated Concept plan in the LDP confirms the leisure element of this allocation comprises public access greenspace/recreation associated with the residential development. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.



J	Swansea Central Area	150	Site J is allocated for a range of regeneration projects with the overall aim of creating a vibrant, distinctive, Central Area that capitalises on its unique assets to become a destination of regional and national significance. It includes proposals for a high quality retail and leisure led scheme, mixed use waterfront developments, circa 856 homes, 4 hectares of potential development areas that could accommodate B1 uses, and area initiatives and environmental enhancements during the Plan period. This large strategic site comprises the City Centre of Swansea and is, inevitably, in a multiplicity of ownerships. The allocated seeks regeneration via a number of small and disparate development sites which are individually too small to accommodate the proposed development. Furthermore, the area, which is adjacent to the coast and the River Tawe, is flat and lacks the topography to accommodate the snow centre. As such, the site is not suitable or available.
K	Fabian Way Corridor	180	Site K is allocated for mixed commercial, residential (525 dwellings) and employment development with 12 hectares of potential development areas that could accommodate appropriate B1, B2 and B8 uses to complement the role of the Swansea Central Area as the City Region economic driver, facilitating an Innovation Corridor to support University expansion, and capturing the benefits of the planned Tidal Lagoon. As a strategic housing and employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
L	Tawe Riverside Corridor and Hafod Morfa Copper Works	50	Land and buildings are allocated for a mixed use heritage and culture led regeneration site consisting of up to 258 dwellings, employment uses (B1), leisure and community uses, and contributing towards the preservation and enhancement of the area's unique historic and cultural heritage. The LDP notes that the site has numerous listed buildings and structures of importance for their industrial history, which represent a significant regeneration opportunity. Any development proposals must positively reflect the historic riverside character. The policy also notes that the Hafod/Morfa Copperworks Project seeks to deliver regeneration opportunities for the site through the restoration of the historic buildings and the creation of new uses, which will form part of a vibrant, multi-purpose hub for homes, work, education, leisure, commercial activity and tourism. A longer term aspiration for the site is to pursue designation as a World Heritage Site. The allocation clearly does not envisage large footprint leisure and cannot be considered suitable for the leisure scheme proposed. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.



The only non strategic housing allocations large enough to accommodate the 4.5 hectares required for the Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation are as follows:

Site H1.3 - Townhill Campus, Townhill Road, Townhill

Large enough to accommodate the core elements of the development but itself in an out of centre location and served by residential roads and with no road-side presence from surrounding main roads. As a housing allocation it cannot be considered suitable for the leisure scheme proposed. Furthermore, the site has planning permission for development in accordance with its allocation and operations have begun on site. The site is not, therefore, suitable, available or sequentially preferable.

Site H1.5 - Land at Upper Bank, Nantong Way, Landore

As a housing allocation it cannot be considered suitable for the leisure scheme proposed. While the site is large enough to accommodate the core elements of the development it is in an out of centre location and thus not sequentially preferable. Furthermore, the site's 1:10 slope is only half that needed to accommodate the snow centre. The site is not, therefore, suitable or sequentially preferable.

Site H1.21 - Former Cefn Gorwydd Colliery, Gorwydd Road, Gowerton

The site is in an out of centre location and served by residential roads and with no road-side presence from surrounding main roads. As a housing allocation it cannot be considered suitable for the leisure scheme proposed.

Site H1.23 - Land at Carmel Road and Bryntirion Road, Pontlliw

As a housing allocation it cannot be considered suitable for the leisure scheme proposed. While the site is large enough to accommodate the core elements of the development it is in an out of centre location with poor communication links and thus not sequentially preferable. Furthermore, the site has planning permission for development in accordance with its allocation and cannot be considered available. Furthermore, the site is flat and lacks the topography to accommodate the snow centre. The site is not, therefore, suitable, available or sequentially preferable.

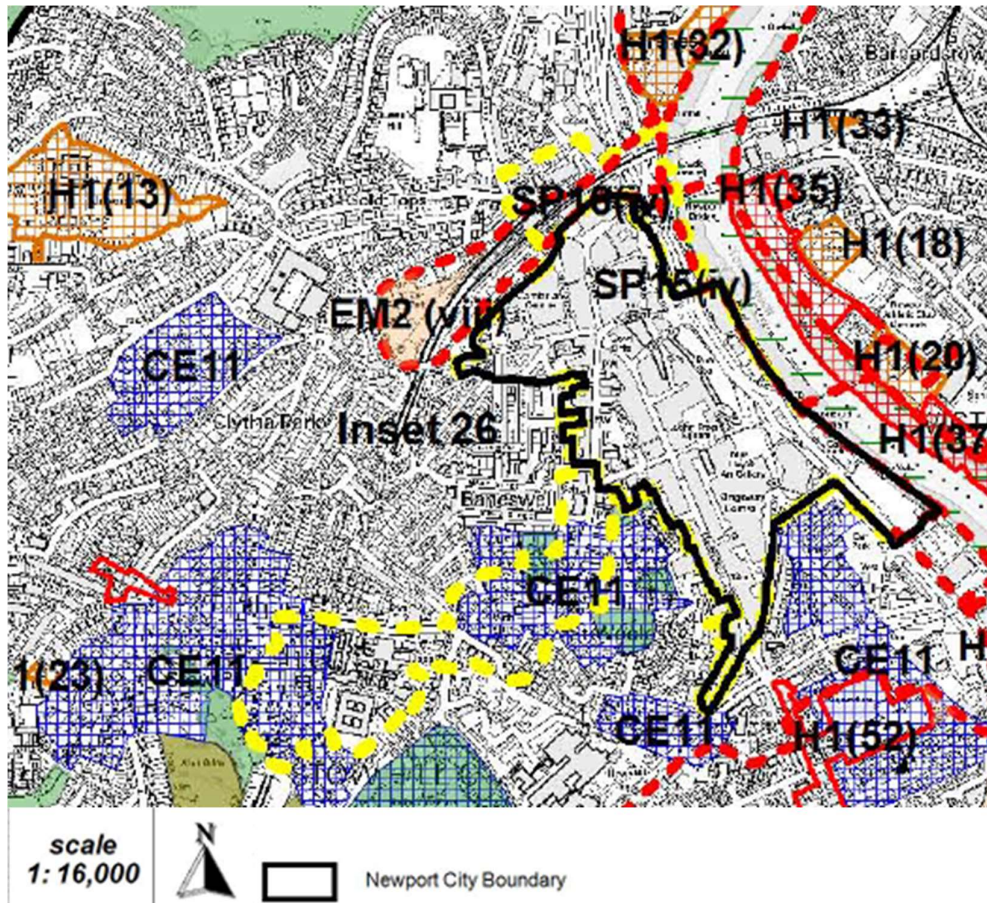
Site H1.26 - Land at Former Penllergaer Civic Offices, Penllergaer

The site has been developed in accordance with its allocation and cannot be considered available.



APPENDIX 4 – NEWPORT





Newport Town Centre



The Newport LDP contains 64 housing allocations and nine employment allocations. Of the housing allocations 17 are of a size sufficient to accommodate the core elements of the development and thus warrant further consideration:

LDP Ref	Site Name	Ha	Remaining units	Comments
H3	Llanwern Village	44	253	Planning permission is in place and development well underway. The site is flat and unable to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
H4	Pirelli	6.5	75	This site has been fully developed in accordance with its allocation and is no longer available.
H10	Pencoed Castle	9.60	12	Planning permission in place for development in accordance with the site's allocation. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with poor transportation/active travel links. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is not suitable, available or sequentially preferable.
H12	Former Tredegar Park Golf Course*	9.3	30	This site has been fully developed in accordance with its allocation and is no longer available.
H13	Allt Yr Yn Campus	5.7	118	This site has been fully developed in accordance with its allocation and is no longer available.
H14	Monmouthshire Bank Sidings	11.3	35	This site has been fully developed in accordance with its allocation and is no longer available.
H38	Lysaghts Village (Orb works)	11.8	338	This site has been fully developed in accordance with its allocation and is no longer available.
H39	Former Bettws Comprehensive	5.9	125	This site has been fully developed in accordance with its allocation and is no longer available.



H41	Trinity View	19.4	6	This site has been fully developed in accordance with its allocation and is no longer available.
H45	Lysaghts Parc	5.8	100	This site has been fully developed in accordance with its allocation and is no longer available.
H47	Glan Llyn	193	441	Planning permission is in place and development well underway. The site is flat and unable to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
H51	Whitehead Works	18.7	120	Planning permission is in place and development well underway. The site is flat and unable to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
H52	Old Town Dock Remainder	13.9	350	Planning permission is in place and conditions being actively discharged. The site is flat and unable to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
H54	Jubilee Park, Former Alcan Site	40	930	This site has been fully developed in accordance with its allocation and is no longer available.
H55	Jigsaw Site, Ringland	7.8	200	Planning permission in place for development in accordance with its allocation and is no longer available. The site has a mild slope forward insufficient to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.



H56	Opposite Belmont Lodge	6.92	122	Planning permission in place for golf related development and new homes. The site is flat and lacks the topography to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
H58	Panasonic	7.20	250	This site has been fully developed in accordance with its allocation and is no longer available.

Of the employment allocations six are of a size sufficient to accommodate core elements of the development and thus warrant further consideration:

LDP Ref	Site Name	Ha	Use	Comments
EM1 i	DUFFRYN	38.5	B1, B2, B8	The supporting text to this policy notes that "the owner (Welsh Government) has designated the site for single large user projects of at least 10ha at a time." It is very unlikely that the Welsh Government would release part of this land for leisure development at odds with its Development Plan allocation. Certainly, as a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with relatively poor transportation links. As such, the site is not suitable, available or sequentially preferable.
EM ii	EAST OF QUEENSWAY MEADOWS, SOUTH OF GLAN LLYN	27	B1, B2, B8	The supporting text to this policy notes that "This site is well connected to the Southern Distributor Road and is an excellent strategic location for B1, B2 and B8 uses." It is, however, out of centre with poor public transport and active travel links. As above, "this site is owned by Welsh Government and has been designated for single large user projects of at least 10ha at a time". It is very unlikely that the Welsh Government would release part of this land for leisure development at odds with its Development Plan allocation. Certainly, as a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre. As such, the site is not suitable, available or sequentially preferable.



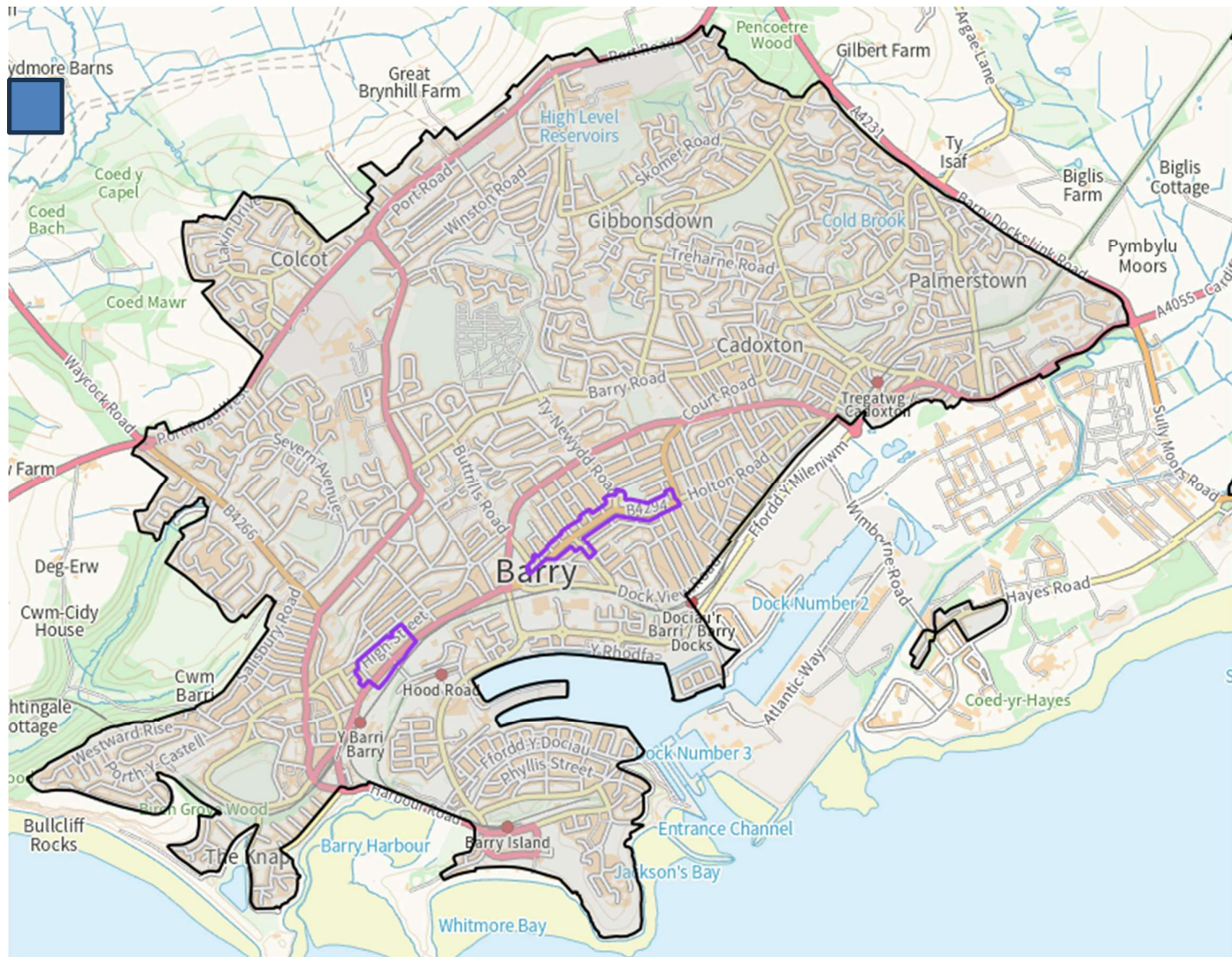
EM iii	CELTIC SPRINGS	6	B1	As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site is flat, lacking the slope necessary to accommodate the snow centre, and is out of centre with poor public transport and active travel links. As such, the site is not suitable, available or sequentially preferable.
EM iv	SOLUTIA	43	B1, B2, B8	The supporting text to this policy notes that "This site is well connected to the Southern Distributor Road and is an excellent strategic location for B1, B2 and B8 uses. Proximity to Newport International Sports Village also gives it potential for leisure uses related to the Sports Village." However, the site is almost entirely flat, rising less than a metre across its entire length. Accordingly, it lacks the slope necessary to accommodate the snow centre. The site is also out of centre with relatively poor public transport and active travel links. As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. As such, the site is not suitable, available or sequentially preferable.
EM v	GWENT EUROPARK	16	B8	The supporting text to this policy notes that "It is very well located for access to the motorway and rail network." However, it is out of centre (located to the east of the former Llanwern steelworks site) with very poor public transport and active travel links. However, the site is entirely flat (lacking the slope necessary to accommodate the snow centre) and entirely within a SSSI. As a strategic employment allocation, it cannot be considered suitable for the leisure scheme proposed and the site has been development for employment purposes since the LDP was adopted and thus is unavailable. The site is not suitable, available or sequentially preferable.
EM vii	CELTIC BUSINESS PARK (LLANWERN FORMER STEELWORKS EASTERN END)	35.5	B1, B2, B8	The site is out of centre (located on the former Llanwern steelworks site) with very poor public transport and active travel links. It is entirely flat and lacks the slope necessary to accommodate the snow centre. As a strategic employment allocation, it cannot be considered suitable for the leisure scheme proposed and the site has been development for employment purposes since the LDP was adopted and thus is unavailable. The site is not suitable, available or sequentially preferable.



APPENDIX 5 – BARRY



Barry Town Centre and Settlement Boundary



The Vale of Glamorgan LDP contains 48 housing allocations and 11 employment allocations. There are 16 housing allocations and eight employment allocations of a size sufficient to accommodate the core elements of the development and thus warrant further consideration (allocations in “minor rural settlements” have not been considered further due to their inerrant inappropriateness):

LDP Ref	Site Name	Ha	Use	Comments
MG2(1)	Phase 2, Barry Waterfront	48.55	Housing, retail, hotel, office, leisure, community	Planning permission is in place and development well underway – the site cannot be considered as available. The site is flat and unable to accommodate the snow centre. As such, the site is neither suitable, nor available for the development proposed.
MG2(2)	Land at Higher End, St. Athan	9.78	Housing	The majority of this site has been developed in accordance with its allocation and is no longer available. The undeveloped western element is of insufficient size to accommodate the proposed development, flat, served by minor roads only and not within acceptable travel-time of target population by multiple modes. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. As such, the site is neither suitable, nor available for the development proposed.
MG2(3)	Land at Church Farm, St. Athan	8.4	Housing	While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. Being in the vicinity of St Athan (rather than Barry), the site is not within acceptable travel-time of target population by multiple modes. The site itself is in an out of centre location. It is not, therefore, suitable or sequentially preferable.



MG2(7)	Land between new Northern Access Road and Eglwys Brewis Road, Llantwit Major	15.8	Housing	This western half of this site is owned by Welsh Government and has planning permission (subject to a legal agreement) for development in line with its allocation. It is very unlikely that the Welsh Government would release part of this land for leisure development at odds with its Development Plan allocation, particularly given the Welsh Government's commitment to house building – the site cannot be considered as available. Certainly, as a housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site lacks the slope necessary to accommodate the snow centre and is not within acceptable travel-time of target population by multiple modes. The site itself is in an out of centre location and is not, therefore, suitable, available or sequentially preferable.
MG2(9)	White Farm	12.1	Housing	This site has been fully developed in accordance with its allocation and is no longer available.
MG2(10)	Land to the east of Pencoedtre Lane	2.8	Housing	This site has been considered notwithstanding its size due to its proximity to the site below. However, it has been fully developed in accordance with its allocation and is no longer available.
MG2(11)	Land to the west of Pencoedtre Lane	4.45	Housing	Too small to accommodate even the core elements of the development and included on this list in case it could be combined with site MG2(10), which is not the case (see above). The site is flat and unable to accommodate the snow centre. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed.
MG2(20)	Land to the north and west of Darren Close, Cowbridge	27	Housing	The vast majority of this site has been developed in accordance with its allocation and is no longer available.



MG2(24)	Land at Upper Cosmeston Farm, Lavernock	22.2	Housing	This site is owned by Welsh Government and has planning permission for development in line with its allocation. It is very unlikely that the Welsh Government would release part of this land for leisure development at odds with its Development Plan allocation, particularly given the Welsh Government's commitment to house building – the site cannot be considered as available. Certainly, as a housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the site lacks the slope necessary to accommodate the snow centre. As such, the site is not suitable, available or sequentially preferable.
MG2(28)	Land at and adjoining St. Cyres School, Murch Road	13.2	Housing	This site has been fully developed in accordance with its allocation and is no longer available.
MG2(32)	Land south of Llandough Hill / Penarth Road	5.23	Housing	The longest dimension of this site is c270m, insufficient to accommodate the Snow slope length. Furthermore, the topography of the land drops only 10m over than length, giving a slope of just 1:27, insufficient to provide the necessary fall for the snow slope. As such, the site is unsuitable for the proposed development.
MG2(34)	Llandough Landings	6	Housing	This site is a flat site constrained by an active rail line to the west and the River Ely to the east, resulting in unsuitable topography to accommodate the Snow Centre and unsuitable access options.
MG2(35)	Land north of the Railway Line, Rhoose	25.82	Housing	The vast majority of this site has been developed in accordance with its allocation and is no longer available. The undeveloped eastern element is flat and served by minor roads only. The proximity of the site to Cardiff Airport runway is also likely to cause significant concerns. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. As such, the site is neither suitable, nor available for the development proposed.



MG2(37)	Land West of Swanbridge Road, Sully	20	Housing	The vast majority of this site has been developed in accordance with its allocation and is no longer available.
MG2(38)	Land to the west of Port Road, Wenvoe	6.98	Housing	The vast majority of this site has been developed in accordance with its allocation and the remainder is an operational garden centre and is therefore no longer available.
MG2(42)	ITV Wales, Culverhouse Cross	7.13	Housing	This site has been fully developed in accordance with its allocation and is no longer available.
MG9(1)	Land to the South of Junction 34 M4 Hensol	55.19	B1, B2, B8	The site comprises a “strategically located flagship sites that will stimulate inward investment and consolidate the role of the Vale of Glamorgan within the Capital Region”. It cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. The site is not, therefore, suitable, available or sequentially preferable.
MG9(2)	Land adjacent to Cardiff Airport and Port	77.4	B1, B2, B8	As above, the site comprises a “strategically located flagship sites that will stimulate inward investment and consolidate the role of the Vale of Glamorgan within the Capital Region”. It cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. The proximity of the site to Cardiff Airport runway is also likely to cause significant concerns. The site is not, therefore, suitable, available or sequentially preferable.



MG9(3)	St Athan, Aerospace Business Park	305	Employment/ Education	Now known as 'Bro Tathan', this site forms a flagship site in the Welsh Government's portfolio of land and is subject of a recent submitted planning application for employment development, in line with its allocation. The site cannot be considered suitable or available for the leisure development proposed. The proximity of the site to Cardiff Airport runway is also likely to cause significant concerns. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. The site is not, therefore, suitable, available or sequentially preferable.
MG9(4)	Atlantic Trading Estate	9.14	B1, B2, B8	This allocation is made up of seven proximate, but not adjoining, individual sites. None but the largest of these are of a size sufficient to accommodate the core elements of the development and even this site has a maximum dimension insufficient to accommodate the snow centre. All sites are also flat and allocated for employment development. As such, the allocation is unsuitable for the proposed development.
MG9(5)	Land at Ffordd y Mileniwm	8.9	B1, B2, B8	As an employment allocation it cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. As such, the allocation is unsuitable for the proposed development.
MG9(7)	Hayes Road, Sully	7.5	B1, B8	As an employment allocation it cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, this coastal site is flat and so unable to accommodate a ground bearing snow slope. As such, the allocation is unsuitable for the proposed development.

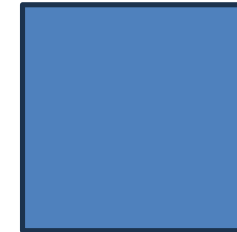
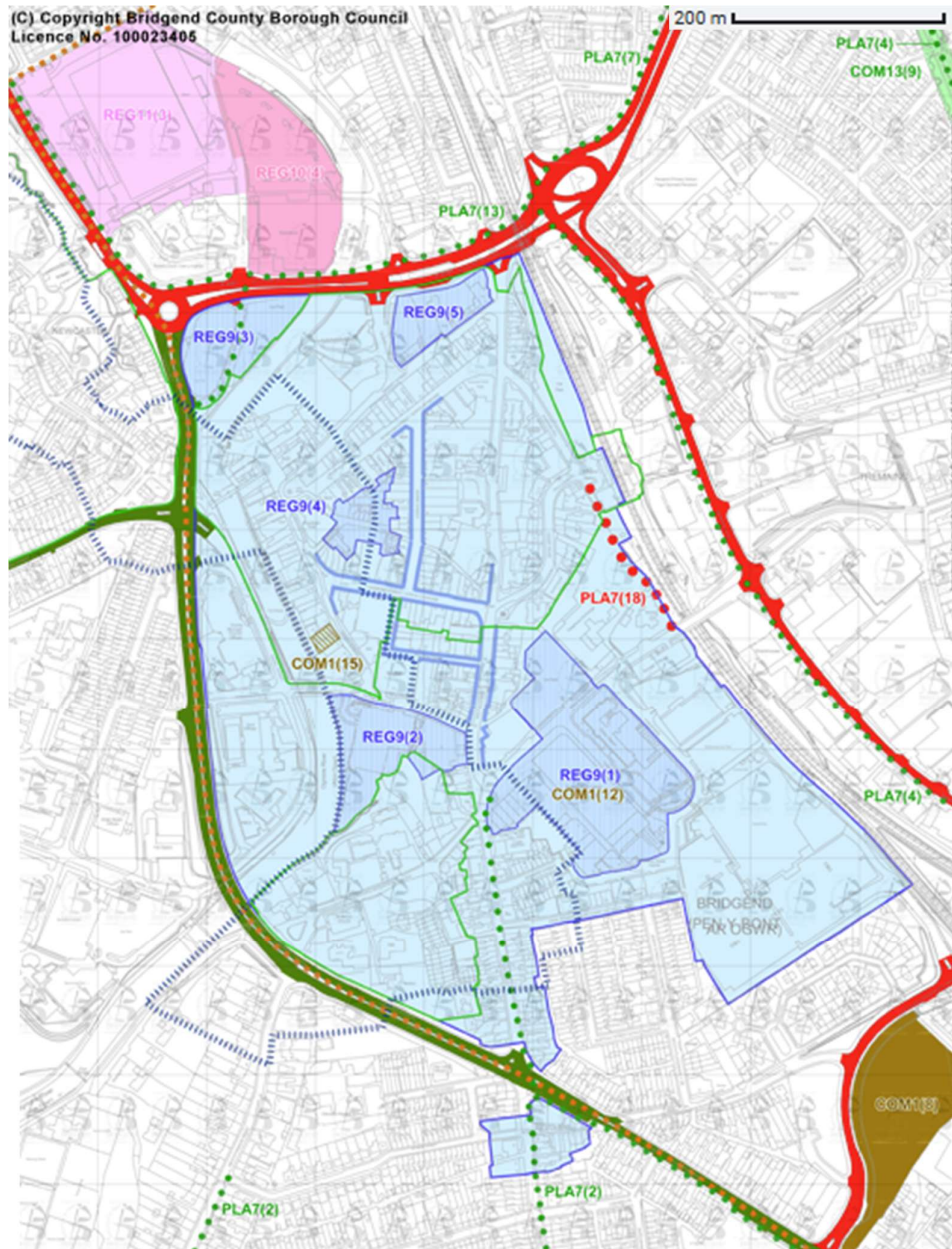


MG9(9)	Llandow Trading Estate	6.8	B1, B2, B8	As an employment allocation it cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, this former WWII airfield site is flat and so unable to accommodate a ground bearing snow slope. Furthermore, the site is in an out of centre location in the rural Valo of Glamorgan and thus is not sequentially preferable and is inaccessible by non-car modes. As such, the allocation is unsuitable for the proposed development.
MG9(11)	Land to the South of Junction 34 M4 Hensol	6.64	B1, B2	See MG9(1) comments, above.



APPENDIX 6 – BRIDGEND





Bridgend Town Centre

The Bridgend Replacement LDP contains a number of strategic housing and employment allocations as well as non-strategic housing allocations which are of a size sufficient to accommodate the development and thus warrant further consideration:

LDP Ref	Site Name	Size (Ha)	Comment
Strategic Sites			
PLA1 SP2(1)	Porthcawl Waterfront	41.32	Allocated for a comprehensive, regeneration-led, mixed-use development including circa 1,100 homes, new Welsh primary school, classroom extension at the existing English primary school, new food store, leisure facilities, new bus terminus, recreation facilities, community facilities and commercial uses. Part of the site has been developed (Aldi food store, new bus terminus) or is currently being developed (maritime centre complex), in accordance with its allocation. As the site forms a strategic mixed-use regeneration site in the LDP, including a housing allocation for 1,100 dwellings and is described as being “essential to the delivery of the LDP”, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore while the remaining site allocation is large enough to accommodate the development, the land is flat and so unable to accommodate a ground bearing snow slope. As such, the site is not suitable or available.
PLA2 SP2(2)	Land South of Bridgend (Island Farm)	49.95	Allocated for a comprehensive mixed-use development including circa 788 homes, new primary school, relocation of Heronsbridge Special School, leisure facilities, recreation facilities, community facilities, employment and commercial uses. The site forms a strategic mixed-use urban extension site in the LDP, including a housing allocation for 788 dwellings and is described as being “essential to the delivery of the LDP”, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore while the site is large enough to accommodate the development, the land is flat and so unable to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is not suitable or available.



PLA3 SP2(3)	Land West of Bridgend	36.86	Allocated for comprehensive residential led development including circa 804 homes, new Primary School, recreation facilities, public open space and community facilities. The site forms a strategic mixed-use urban extension site in the LDP, including a housing allocation for 850 dwellings and is described as being “essential to the delivery of the LDP”, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, while the land is gently sloping in parts (approx 1:30), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is neither suitable nor available.
PLA4 SP2(4)	Land East of Pencoed	44.27	Allocated for a comprehensive mixed-use development including circa 804 homes, new primary school, recreation facilities, community facilities and commercial uses. The site forms a strategic mixed-use urban extension site in the LDP, including a housing allocation for 804 dwellings and is described as being “essential to the delivery of the LDP”, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, while the site is large enough to accommodate the development, the land is flat and so unable to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is not suitable or available.
PLA5 SP2(5)	Land East of Pyle, Kenfig Hill and North Cornelly	99.86	Allocated for comprehensive, residential led mixed-use development including circa 2,003 homes, two primary schools, leisure and recreation facilities, community facilities and commercial uses. The site forms a strategic mixed-use urban extension site in the LDP, including a housing allocation for 2,003 dwellings and is described as being “essential to the delivery of the LDP”, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, while the land has undulating slopes (ranging from approx. 1:20 to 1:27), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is not suitable, available or sequentially preferable.



Non-Strategic Housing Allocations			
COM1(1)	Craig y Parcau, Bridgend	6.6	Allocated for approximately 108 homes across two different parcels of land. The land is flat and so unable to accommodate a ground bearing snow slope, and it is also out of centre and as such, the site is not suitable or sequentially preferable.
COM1(2)	Land south of Pont Rhyd-y-Cyff, Maesteg	5.5	Allocated for approximately 108 homes. While the land is gently sloping (approx 1:26), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. Furthermore, the site out of centre and as such, the site is neither suitable or sequentially preferable.
COM1(4)	Land south of Pont Rhyd-y-Cyff, Maesteg	7.33	Allocated for approximately 102 homes. The land is flat and so unable to accommodate a ground bearing snow slope, and it is also out of centre and as such, the site is not suitable or sequentially preferable.
COM1(5)	Former Cooper Standard Site, Maesteg	7.7	Allocated for approximately 102 homes. The land is flat and so unable to accommodate a ground bearing snow slope. Furthermore, outline planning permission was granted in May 2024 (Ref: P/12/808/OUT) for a mixed use development incorporating circa 201 houses which underscores its lack of availability. As such, the site is neither suitable nor available.
Long-Term Regeneration Sites			
COM1 (R1)	Coegnant Reclamation Site	9.2	While the land does slope (approx 1:32), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. Furthermore, the site has relatively poor accessibility. As such the site is not suitable for the proposed development.
COM1 (R2)	Maesteg Washery	9	While the land does slope (approx 1:15), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. As such the site is not suitable for the proposed development.
Employment Allocations			
ENT1 (1)	Brocastle, Bridgend	20.4	A strategic employment site which is described as “representing the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy” in the LDP. As a strategic employment allocation, it cannot be considered available for the leisure scheme proposed. Furthermore, while the land has undulating slopes (ranging from approx. 1:45 to 1:55), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is not suitable, available or sequentially preferable.



ENT1 (2)	Pencoed Technology Park	5.4	A strategic employment site which is described as “representing the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy” in the LDP. As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the land is flat and so unable to accommodate a ground bearing snow slope and is also out of centre and as such, the site is not suitable, available or sequentially preferable.
ENT1 (3)	Brackla Industrial Estate	7.7	A strategic employment site which is described as “representing the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy” in the LDP. As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the land is relatively flat and so unable to accommodate a ground bearing snow slope and is also out of centre and as such, the site is not suitable, available or sequentially preferable.
ENT1 (4)	Bridgend Industrial Estate	9.2	A strategic employment site which is described as “representing the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy” in the LDP. As a strategic employment allocation, it cannot be considered available for the leisure scheme proposed. The site is also completely flat and so unable to accommodate a ground bearing snow slope. As such the site is cannot be considered suitable.
ENT1 (8)	Waterton Industrial Estate		A strategic employment site which is described as “representing the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy” in the LDP. As a strategic employment allocation, it cannot be considered suitable or available for the leisure scheme proposed. The site is also completely flat and so unable to accommodate a ground bearing snow slope. As such the site is cannot be considered suitable.



APPENDIX 7 – CWMBRAN



The Torfaen LDP contains a number of strategic sites and housing allocations which are of a size sufficient to accommodate the development and thus warrant further consideration:

LDP Ref	Site Name	Size (Ha)	Comment
Strategic Sites			
SSA1	Eastern Strip Central Strategic Action Area, Cwmbran	13.4	Allocated for an employment led mixed-use regeneration scheme including B1 and B2 uses, a hotel, a foodstore, leisure uses and public open space. The Council's vision for this site, as set out in the LDP, is of a comprehensive redevelopment of the site through a commercial/employment led mixed-use regeneration scheme to create a quality and distinctive location that integrates in design, physical and visual terms with the Town Centre. As such it cannot be considered available for the leisure scheme proposed. Furthermore while the site is large enough to accommodate the development, the land is completely flat and so unable to accommodate a ground bearing snow slope and is therefore considered to be not suitable.
SAA2	Canalside Strategic Action Area, Cwmbran	6.2	Allocated for mixed use development comprising 150 dwellings, canal side uses and public open space. The Council's vision for this site, as set out in the LDP, is the development of a vibrant and distinctive new town centre quarter for Cwmbran. The allocation is made up of a number of different land parcels which appear to be in a multiplicity of ownerships. The allocation seeks regeneration via a number of small and disparate development sites which are individually too small to accommodate the proposed development. Furthermore, the area, which is adjacent to the Canal is relatively flat and lacks the topography to accommodate the snow centre. As such, the site is not suitable or available for the leisure scheme proposed.



SAA3	Llantarnam Strategic Action Area, Cwmbran	29	Allocated for circa 450 dwellings, employment land (Class B1), a neighbourhood centre and informal recreation provision. The Council's vision for this site, as set out in the LDP, is to unite the fragmented employment and residential areas in South Llantarnam through the creation of a quality mixed use community with a new neighbourhood centre providing facilities for both the existing and future community. The site has planning permission for development and has been largely developed, leaving a residual site of approx 9 hectares. Whilst this would be large enough to accommodate the development, the land is flat and so unable to accommodate a ground bearing snow slope. Furthermore, there is an existing overhead electricity line that crosses the middle of the site (north to south) which acts as a major constraint to development. The site is also out of centre and as such, the site is considered to be not suitable.
SAA4	Mamhilad Strategic Action Area, Pontypool	72	Allocated for the construction of approximately 1,700 dwellings, employment uses, re-use of the Grade II* Listed Building, neighbourhood centre, primary school, open space and recreation facilities as part of a mixed use scheme to create a sustainable urban village. The Council's vision for this site, as set out in the LDP, is the transformation of a dated employment area and surrounding land to a mixed use sustainable urban village. As the site forms a strategic sustainable urban village in the LDP, including a housing allocation for 1,704 dwellings, it cannot be considered available for the leisure scheme proposed. The northern part of the site (covering 50 ha of the site allocation) is the subject of a live and extensively progressed application (Ref: 17/P/0468/OUT) for the development of up to 900 dwellings. This further underscores its lack of availability. Furthermore, the land is flat and so unable to accommodate a ground bearing snow slope. It is also out of centre and as such, the site is not suitable, available or sequentially preferable.



SAA5	The British Strategic Action Area, Talywain, Pontypool	72	Allocated for a major land reclamation scheme which will prepare the land required for future redevelopment as part of a long term regeneration scheme and make safe the surrounding land. While the land has changes in topography and is sloping (ranging from approx. 1:10 to 1:30), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. It is also out of centre and is not within acceptable travel-time of target population by multiple modes. As such, the site is not suitable or sequentially preferable.
SAA6	South Sebastopol Strategic Action Area, Cwmbran	103	Allocated for an urban village comprising a new sustainable community consisting of 1,200 dwellings, education provision, community facilities, neighbourhood centre, playing pitch provision and public open space. Outline planning permission for a residential-led, urban expansion project comprising up to 1200 new homes, ancillary retail and community development, allotments, playing fields and strategic landscaping was granted in 2014 (Ref: 14/P/00362) and the majority of this site has been fully developed in accordance with its allocation with the remaining land expected to come forward for housing. The site is therefore no longer available.
SAA7	Llanfrechfa Grange Strategic Action Area, Cwmbran	44	Allocated for the construction of a Specialist and Critical Care Centre Hospital, approximately 300 dwellings, 4.8 hectares of associated employment land (healthcare related uses), community facilities, playing pitch provision, children's play areas and public open space. The Grange Hospital has been developed on the southern part of the allocation opening in November 2020 leaving a residual site of approx 10 hectares. Whilst this would be large enough to accommodate the development, the land is flat and so unable to accommodate a ground bearing snow slope. The site is also out of centre and as such, the site is considered to be not suitable or sequentially preferable.

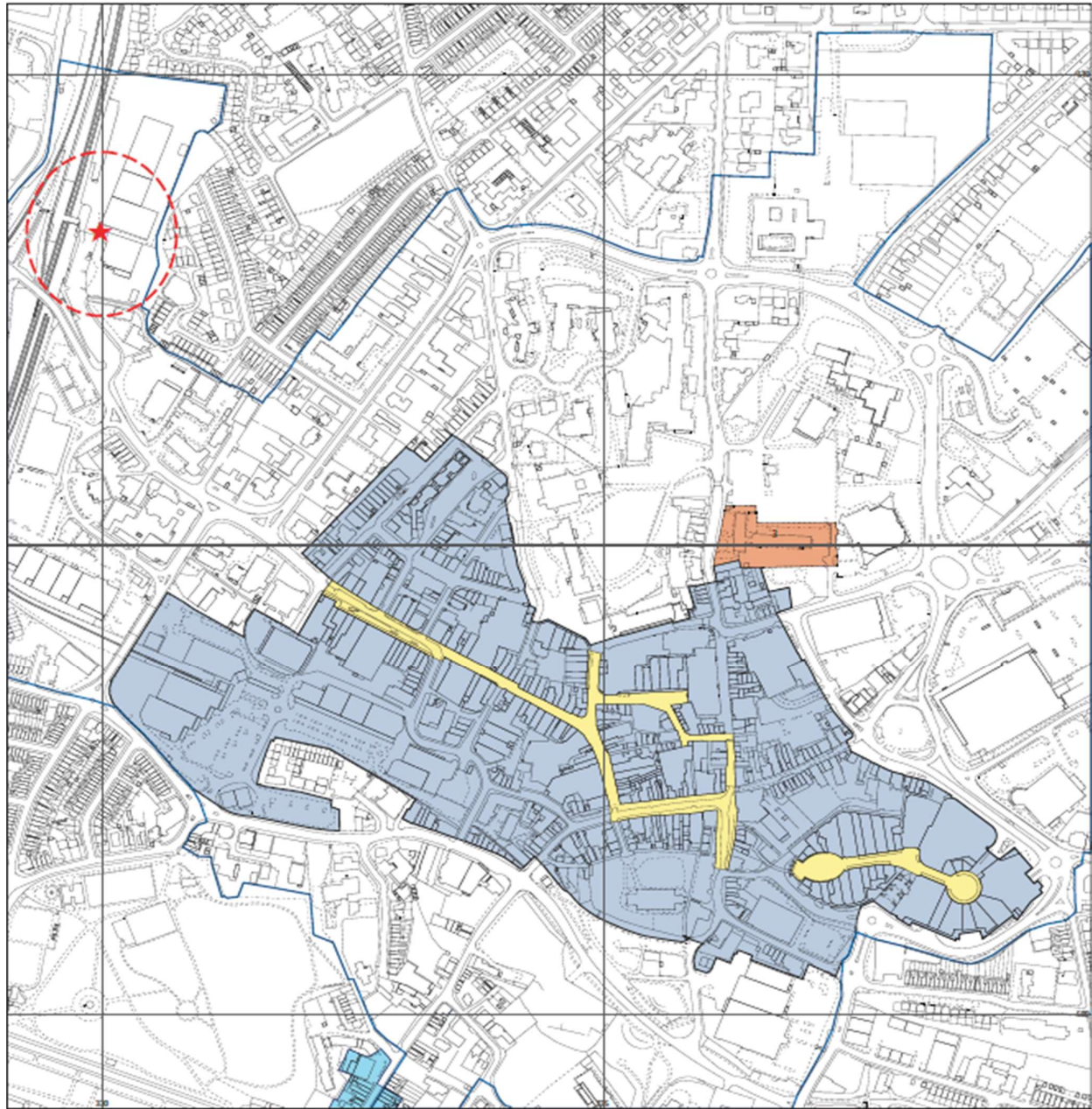


Strategic Housing Sites			
H1/1	County Hall and Police HQ, Llanyravon		Allocated for approximately 220 homes. This site comprises of two employment uses (namely the former County Hall and the Gwent Police Headquarters) with associated parking and access routes. Areas of woodland also form part of this site. The site is 12.14ha in total, but only 5.48ha is expected to be net developable. As a strategic housing allocation, it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the northern part of the allocation (site occupied by the former County Hall) had planning permission approved in May 2020 for 143 dwellings (Ref: 18/P/0798/FUL) with conditions currently being actively discharged, which further underscores its lack of availability. The remaining land to the south at 3.2ha is not large enough to accommodate the proposed development. Furthermore, the site is out of centre. As such, the site is not suitable, available or sequentially preferable.
H1/2	Former Police College & Adjacent Land, St. Dials	20.75	Allocated for 350 dwellings. This site has been developed for housing in accordance with its allocation. Phases 1 and 2 consisting of 327 homes (Ref: 15/P/01453/FUL) and 17/P/0548/FUL) have been completed and are occupied. Planning permission for Phase 3 (84 homes) was granted in March 2024 (Ref: 22/P/0298/FUL) with conditions having been discharged. This site is no longer available.
H2/1	Former Trevethin School, Penygarn	4.2	Allocated for 115 dwellings. This site has been fully developed in accordance with its allocation and is no longer available.
H2/2	Animal Pound & Adjacent Land, Wainfelin	20.4	Allocated for 135 dwellings. This a sloping site (approx. 1:10) however it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. The site is also out of centre and accessed by residential streets only, providing inappropriate access for the proposed development. The site is therefore considered unsuitable.
H2/3	Pontypool College, Cwmyrnyscoy	5.2	Allocated for 140 dwellings. Whilst the site does slope in parts (approx. 1:25) it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. The site is also out of centre and accessed by residential streets only, providing inappropriate access for the proposed development. The site is therefore considered unsuitable.



APPENDIX 8 – WREXHAM





Wrexham Town Centre



The Wrexham LDP contains eight strategic sites and housing allocations which are of a size sufficient to accommodate the development and thus warrant further consideration:

Strategic Housing Sites			
LDP Ref	Site Name	Size (Ha)	Comments
H1	Mold Road/A483	22	This site is allocated for approximately 375 homes and so cannot be considered appropriate for the leisure development proposed. Furthermore, the site is relatively flat (less than 1:10), therefore it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. The site is also out of centre so is not sequentially preferable.
H6	Land off B5070, Chirk	6	This site is allocated for approximately 180 dwellings and so cannot be considered appropriate for the leisure development proposed. While a sloping site (approx. 1:10), it lacks the slope necessary (1:5) to accommodate a ground bearing snow slope. Furthermore, the longest dimension of the site is just 395m, which is insufficient to accommodate the 400m run of the snow slope. Being over 10km from the towns of Wrexham to the north and Oswestry to the south and in a relatively rural part of the country, the site is not within the acceptable travel-time of target population by multiple modes of transport. As such, this site is not suitable.
H10	Land at Home Farm, Llay	16	This site is allocated for approximately 362 dwellings and so cannot be considered appropriate for the leisure development proposed. Residential development at this site is well under way and partially completed, therefore this site is unavailable for the leisure scheme proposed.
H12	Land at Gatewen Road, New Broughton	5	This site is allocated for approximately 112 dwellings and so cannot be considered appropriate for the leisure development proposed. It is in an out of centre location. While large enough to accommodate the core elements of the development, the site is flat and therefore unable to accommodate a ground bearing snow slope. The site itself is served by minor roads and cannot provide appropriate access.
H17	Land North & South, Rossett Road, Rossett	6	The site is allocated for approximately 137 dwellings and so cannot be considered appropriate for the leisure development proposed. The site is flat and lacks the slope necessary to accommodate the snow centre. The site is out of centre with relatively poor public transport and active travel links. Furthermore, planning permission has been approved for 132 homes (ref. P/2018/0560) with conditions being actively discharged, which underscores the lack of availability of the site.

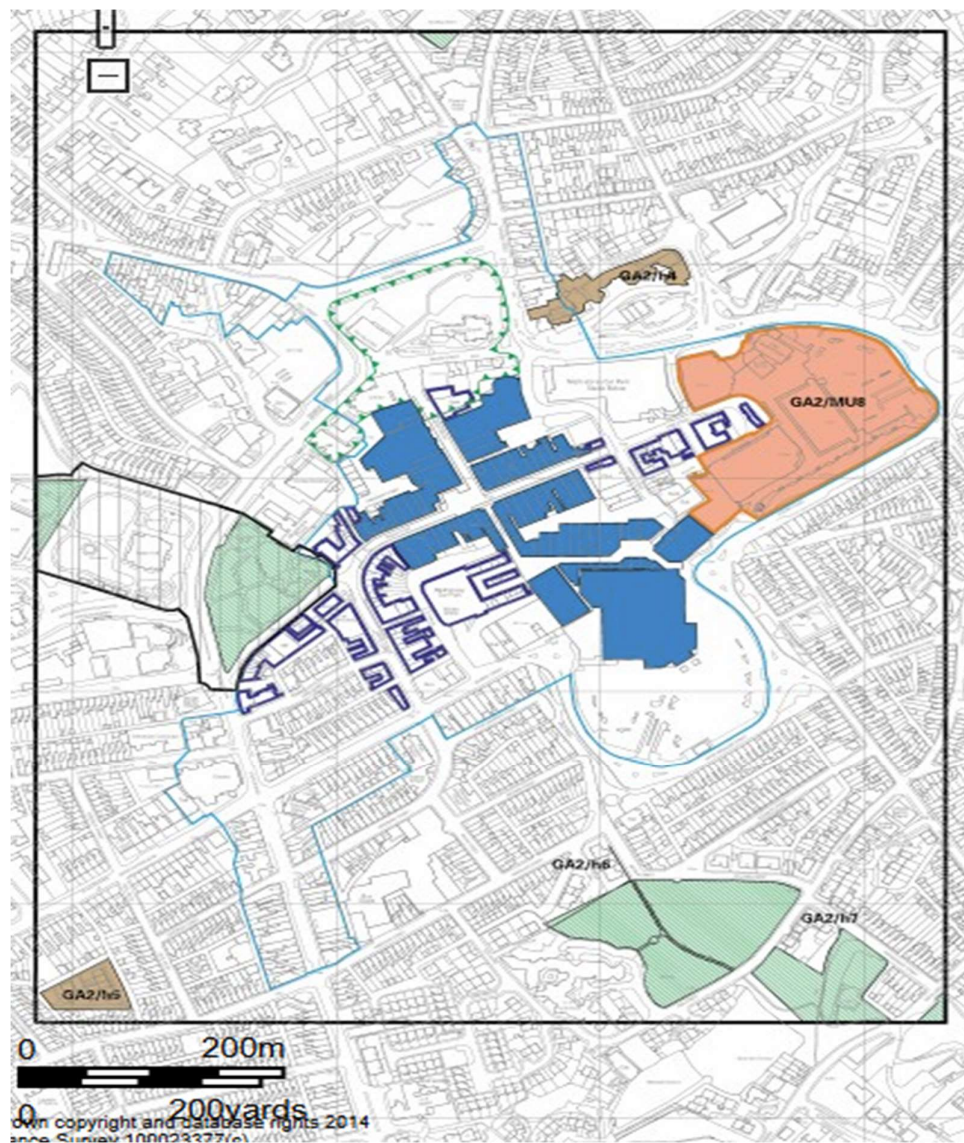


Strategic Sites			
KSS1	Land at Lower Berse Farm	70	Allocated to deliver a residential mixed used scheme with a minimum of 1500 new dwellings. KSS1 is one of the three Key Strategic Sites (KSS) identified in the LDP, the delivery of which plays a crucial role in the implementation of the Plan's strategy. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. The mix of uses envisaged in the policy encompass education (a primary school), open space, community facilities, active travel and public transport – not built leisure of the type proposed in the application. The site is also broadly flat and therefore unable to accommodate a ground bearing snow slope.
KSS2	Land East of Cefn Road	92	A masterplan is in place for this site to deliver a minimum of 1680 new dwellings and necessary infrastructure. KSS2 is one of the three Key Strategic Sites (KSS) identified in the LDP, the delivery of which plays a crucial role in the implementation of the Plan's strategy. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. As above, the mix of uses envisaged in the policy does not encompass built leisure of the type proposed in the application. The site is also broadly flat and therefore unable to accommodate a ground bearing snow slope.
KSS3	Land to the north of Bryn Lane, Wrexham Industrial Estate	28	Allocated for employment land for employment purposes including an ecological network and residential buffer zone. KSS3 is one of the three Key Strategic Sites and the only employment allocation identified in the LDP, the delivery of which plays a crucial role in the implementation of the Plan's strategy. The findings of the Employment Land Review indicates a growing land supply shortfall, relative to identified demand at Wrexham Industrial Estate. The evidence therefore indicates that there is a need to allocate further land at Wrexham Industrial Estate to provide sites which can meet both the needs of existing firms and be marketed to future inward investors. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. The site is also broadly flat and therefore unable to accommodate a ground bearing snow slope.



APPENDIX 9 – LLANELLI





Llanelli Town Centre



The Carmarthenshire LDP contains 11 strategic allocations, which are of a size sufficient to accommodate the development and thus warrant further consideration:

Strategic Sites			
LDP Ref	Site Name	Size (Ha)	Comments
GA1/MU1	West Carmarthen	130	Located on the western edge of Carmarthen, the site forms an important gateway to the town. The site occupies an area of 129.5 hectares and incorporates St David's Hospital. The site plays a key role in the delivery of growth for Carmarthen in accordance with the strategy and the town's position as a Growth Area within the LDP. It is currently the subject of SPG in the form of a Planning and Development Brief. A variety of uses are proposed for the site, including residential with a notional allocation for 1,100 units, education, amenity/recreation and employment. Significant parts of the site are set aside to protect the site's landscape and cultural heritage aspects. Being in the vicinity of Carmarthen (rather than Llanelli), the site is not within acceptable travel-time of target population by multiple modes. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, development of the site is well under way, particularly in the south and east, rendering the site as unavailable. The site's 1:40 slope is wholly unsuitable to accommodate the snow centre. Finally, the site is out of centre and so is not sequentially preferable. As such, the site is unavailable and unsuitable and not sequentially preferable.
GA1/MU2	Pibwrlwyd, Carmarthen	34.7	Located to the south of Carmarthen, the site is located within an area dominated by employment, retail and educational facilities. Part of it falls within the campus of Coleg Sir Gâr. Situated at a strategic location in close proximity to the A48, this largely flat green field site occupies a total area of 34.7 ha, which when taking out the College campus covers an area of 29.56ha. Strategically, the site represents a key area for future employment growth for Carmarthen, consolidating and enhancing the status of Carmarthen regionally by delivering sustainable growth. A development brief in the form of SPG has been prepared and adopted. Being in the vicinity of Carmarthen (rather than Llanelli), the site is not within acceptable travel-time of target population by multiple



			modes. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. Furthermore, the site forms the key employment of the LDP and cannot be considered suitable or available for the leisure scheme proposed. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. As such, the site is unsuitable and not sequentially preferable.
GA2/MU9	South Llanelli Strategic Zone, Delta Lakes	9.2	This site has been fully developed in accordance with its allocation and is no longer available.
GA2/H13, GA2 H12 & GA2/MU3	South Llanelli Strategic Zone, Machynys	1.8, 1.5 & 11.2	This area offers potential for a mixed use proposal incorporating residential, amenity (Eco park) and commercial leisure. It should be noted that the residential element on the area to the west (GA2/H14) has planning permission for 205 units and is nearing completion, whilst the residential development at Pentre Nicklaus is now substantively complete. It is considered that the area identified for amenity use (GA2/MU3) will provide an important mitigation and amenity function for the area. As a strategic allocation it cannot be considered suitable or available for the leisure scheme proposed. Furthermore, development of the site is well under way, particularly in the south and east, rendering the site as unavailable. Furthermore, this coastal site is flat and lacks the slope necessary to accommodate the snow centre. Finally, the site is out of centre and so is not sequentially preferable. As such, the site is unavailable and unsuitable and not sequentially preferable.
GA2/H13, GA2/MU9 & GA2/H15	South Llanelli Strategic Zone, The Avenue	1.8, 9.2 & 2.3	This area either side of the Avenue offer potential for a mix of uses including social and residential care, private health care (for Brain Injury Trust facility) and residential (allowance of 60 units on housing allocation GA2/H13 and 60 units on GA2/H15). The area east of The Avenue has been developed and the parcel west of The Avenue is too small to accommodate the development. It is al flat, served by local roads and out of centre. As such the site is unavailable and unsuitable and not sequentially preferable.
GA2/MU1	South Llanelli Strategic Zone, Old Castle Works	6	It is considered that a mix of uses would be appropriate for this area, with the focus being on the visitor economy, heritage and commercial leisure The site has been cleared with the Grade II listed Tinnings building remaining. The focus will be on bringing the site forward to establish how this historic structure may be effectively and acceptably incorporated into any proposals. The site offers potential for commercial leisure.



			As an allocation for (inter alia) commercial leisure, the site is potentially suitable in principle. However, the site is flat and 400m along it's longest axis to its southern tip (meaning the usable length of the site is c350m) Accordingly, the site is unable to physically accommodate neither the vertical nor horizontal requirements of the snow centre. The site is out of centre and so is not sequentially preferable. The site is unsuitable.
GA2/E1	Dafen, Llanelli	22.8	Located on the A4138 north eastern gateway into Llanelli, the site forms part of an area with a focus on employment related uses. The strategic designation is underpinned by the site's direct access to the M4, together with its current mix of employment uses. These uses range from the automotive productions associated with Calsonic etc through to The Beacon and its office and meeting space. All of these issues provide a steer as to the need for a continuation and consolidation of employment related activity on the site. The site is strategic in size and consists of some 22.80ha of proposed employment land. Dafen therefore represents an important employment area for Llanelli and indeed the whole County. The site affords an opportunity to provide a level of provision consistent with Llanelli's designation as a growth area whilst delivering opportunities for sustainable growth and employment creation. This will assist in achieving the delivery of the LDP strategic objectives, particularly in terms of the promotion of investment and innovation. As can be seen from the above, the allocation forms a key employment allocation of the LDP and cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the allocation comprises of infill opportunities around existing employment units, all but the largest of which are below the 4.5ha search threshold. The largest site has itself been partially developed with c18ha remaining but is irregular in shape meaning the longest usable dimension is c350m. Added to this, the site's topography is broadly flat, with a slop of c1:40. Accordingly, the site is unable to physically accommodate neither the vertical nor horizontal requirements of the snow centre. The site is out of centre and so is not sequentially preferable. The site is unsuitable.
GA3/MU1	Cross Hands Strategic Zone, Cross Hands West	17.3	The site offers the potential for a range of uses with proposals in place for retail, health care (resource centre), residential (220 units), amenity/recreation and the provision roads linking through the site to adjacent communities. The site has planning permission for a mixed use development.



			This site has been almost fully developed in accordance with its allocation and is no longer available.
GA3/MU2	Emlyn Brickworks Site, Cross Hands East	18	Allocated for a mix of uses consisting of residential (allowance for 250 units), community facilities and amenity. Being in the vicinity of Crosshands (rather than Llanelli), the site is not within acceptable travel-time of target population by multiple modes. The site is subject of an implemented and extant planning permission, suggesting the site is unavailable. Moreover, while large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. Furthermore, the site is out of centre. The site is not, therefore, suitable, available or sequentially preferable.
GA3/E7	Cross Hands Strategic Zone, Cross Hands East	18.5	This site is proposed for predominately employment use with appropriate associated uses. It is situated adjacent to the current business/retail park and provides an opportunity to consolidate on the current economic and employment activities within the Cross Hands area. The proposal includes the provision of part of the Cross Hands Economic Link Road (see Policy SP9) as set out within the RTP and Carmarthenshire's Priorities for Transport. Planning permission has been granted for the link road and the employment area with funding secured. Being in the vicinity of Crosshands (rather than Llanelli), the site is not within acceptable travel-time of target population by multiple modes. Furthermore, the Cross Hands Economic Link Road referenced above has been constructed along with other associated estate roads dividing the site up into development plots, none of which are large enough to accommodate the development. This investment underscores the importance of this employment site to the LDP strategy – the site cannot be considered suitable or available for the leisure scheme proposed. The site and individual plots are flat and unable to accommodate the slope required for the Snow Centre. The site is out of centre. The site is not, therefore, suitable, available or sequentially preferable.
GA3/E8	Cross Hands Strategic Zone, Cross Hands West Food Park	8.5	This site situated on the western side of the A48 provides an opportunity to consolidate on the successes experienced in developing the area to date. In this respect, a number of development areas and plateaus have been prepared to allow the completion of development in this area. The site is considered appropriate for employment (B1, B2 and B8) with an emphasis on uses consistent with the food park theme.



			Being in the vicinity of Crosshands (rather than Llanelli), the site is not within acceptable travel-time of target population by multiple modes. Furthermore, the allocation comprises of infill opportunities around existing employment units, all of which are below the 4.5ha search threshold. All of the sites are flat and out of centre. The sites are not, therefore, suitable or sequentially preferable.
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The only employment allocations large enough to accommodate the 4.5 hectares required and which are not covered above are as follows:

Employment Land				
LDP Ref	Site Name	Size (Ha)	Use Class	Comments
GA1/E1	Cillefwr Industrial Estate, Carmarthen	4.38	B1, B2, B8	Slightly below the minimum threshold in combination, this allocation actually comprises three physically separate land parcels which are unable to accommodate the development proposed. The allocation is unsuitable.
GA3/E11	Parc Hendre, Capel Hendre	11.783	B1, B2, B8	This site wraps around existing employment units resulting in a difficult and irregularly shaped site. The site is almost totally flat, out of centre and not within acceptable travel-time of target population by multiple modes. The site is unsuitable and not sequentially preferable.

The only housing allocations large enough to accommodate the 4.5 hectares required for the Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation and which are not covered above are as follows:

Housing			
LDP Ref	Site Name	Size (Ha)	Comments
GA1/h1	Carmarthen (GA1)	7.2	Greenfield site allocated for 180 dwellings and cannot be considered suitable or available for the leisure scheme proposed. The site is irregular in shape, tapering to a point in the south meaning the longest usable dimension is c350m. Added to this, the site's topography up to c1:10. Accordingly, the site is unable to physically accommodate neither the vertical nor horizontal requirements of the snow centre. The site is out of centre and accessed by residential streets only, providing inappropriate access for the proposed development. The site is

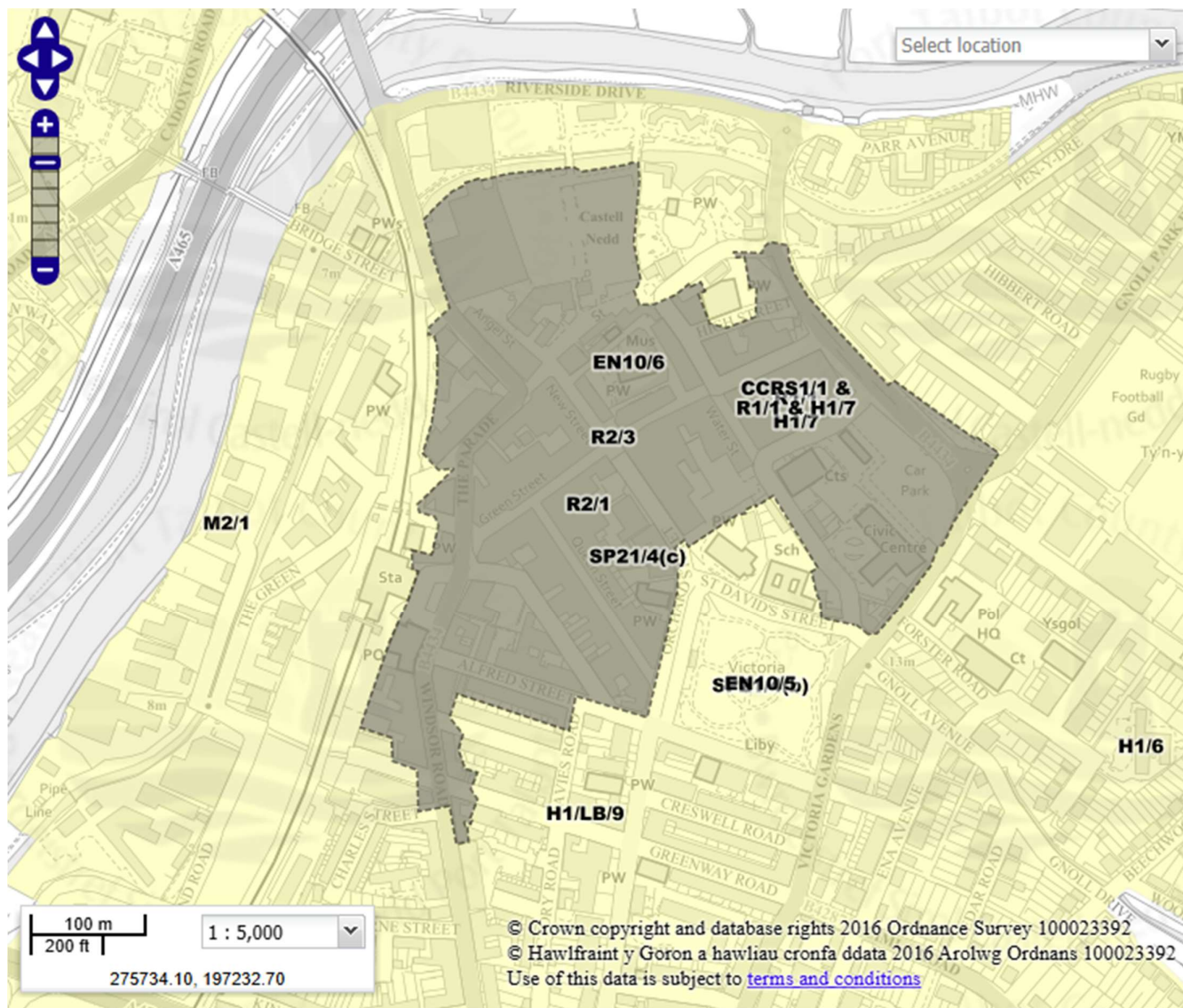


			unsuitable.
GA1/h17	Carmarthen (GA1)	6.3	This site has been fully developed in accordance with its allocation and is no longer available.
GA2/h2	Llanelli (GA2)	8	This site has been fully developed in accordance with its allocation and is no longer available.
GA2/h27	Llanelli (GA2)	5.5	While large enough to accommodate the core elements of the development, the site is lozenge shaped and almost totally flat. Even if the snow Centre were able to be sited within the lozenge, it lacks the topography to accommodate the snow centre. As such, the site is not suitable.
GA2/h30, 31, 56	Llanelli (GA2)	16	Taken together these adjoining sites are allocated for 455 dwellings and cannot be considered suitable or available for the leisure scheme proposed. The sites are accessed by residential streets only, providing inappropriate access for the proposed development. Furthermore, at a slope of 1:13 it lacks the topography to accommodate the snow centre. As such, the site is not suitable.
GA2/h35	Llanelli (GA2)	12.6	As a significant housing allocation the site cannot be considered suitable or available for the leisure scheme proposed. While large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. The site itself is in an out of centre location. It is not, therefore, sequentially preferable.

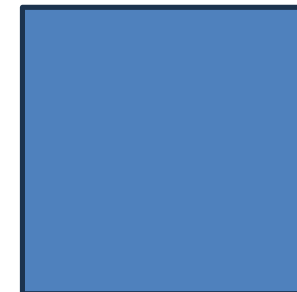


APPENDIX 10 – NEATH





Neath Town Centre



The Neath Port Talbot LDP contains 3 Strategic allocations which are of a size sufficient to accommodate the development and thus warrant further consideration:

Ref	Site	Use	Comment
SRA1, H1/LB/5, EC1/3	Coed Darcy Strategic Regeneration Area	C3, B1	Coed Darcy Urban Village was granted outline planning permission in 2008. Once completed the development will comprise approximately 4,000 dwellings, 41,200 sqm of business use, up to 3,000 sqm of retail floorspace (to provide for the needs of the Urban Village), other commercial development, education and community facilities and associated infrastructure. This site is under-construction. Planning permission is in place and development well underway. The site is a housing allocation necessary to achieve the LDP's strategy. As such, the site is neither suitable, nor available for the development proposed. Site is currently under construction for 1,800 new homes, a new school and new shops being built.
SRA2, H1/17, EC1/4, R1/3	Harbourside Strategic Regeneration Area	C3, B1, B2, B8, A1	The Harbourside SRA is an extensive area of brownfield former dockland close to Port Talbot town centre. It provides an important opportunity for comprehensive mixed use development in a sustainable central location and the redevelopment project is being promoted by the Local Authority in conjunction with private sector developers. As a strategic regeneration site within the LDP the site cannot be considered suitable or available for the leisure scheme proposed. Furthermore, the area has been subdivided into separate parcels by dual carriageways, some of which have been developed and none of which are large enough to accommodate the core elements of the development. The site is also flat and lacking the topography needed to support the Snow Centre. As such, the site is unsuitable and unavailable.
CCUC1	Coastal Corridor University Campus	D1	This site has been fully developed in accordance with its allocation and is no longer available.



The only housing allocations large enough to accommodate the 4.5 hectares required for the Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation and which are not covered above are as follows (sites in Glyneath and Ystalyfera have been discounted as they are not located within acceptable travel-time of target population by multiple modes):

Housing Site			
LDP Ref	Site Name	Size (Ha)	Comments
H1/2	Leiros Park Extension, Bryncoch	10	The greenfield site adjoins an established residential area on the north eastern edge of Bryncoch with good access to Neath Town Centre. While the site has a north to south fall, the slope in this direction is just 1:9 and the dimension is only 300m. The east west dimension is better, at c.480, however there is no east west slope to speak of (1:40). Accordingly, the site lacks the topography to accommodate the snow centre. Furthermore, the site is served by residential estate roads, wholly unsuitable to cater for the likely trip attraction of the proposed development. The site is unsuitable.
H1/9	Crymlyn Grove (Phase 3), Skewen	5.6	The greenfield site is located to the rear of the Crymlyn Parc Estate. The maximum dimension of the site is just 320m with only a 4m fall across this length. As such, the site is too small and lacks the necessary slope to accommodate the Snow Center. Furthermore, the site is served by residential estate roads, wholly unsuitable to cater for the likely trip attraction of the proposed development. The site is unsuitable.
H1/10	Wern Goch, Skewen	4.2	This site has been developed in accordance with its allocation and is no longer available.
H1/11	Neath Road / Fairyland Road, Tonna	11.6	The greenfield site lies adjacent to the 'Hunters Ridge' and 'Paddocks' development in Tonna and is bordered to the west by Neath Road and the south by Fairyland Road. The site is partly developed for housing and is thus unavailable. The site is also almost totally flat with just a 5m fall across the site. As such, the site is unsuitable.
H1/LB/5	Coed Darcy Urban Village, Llandarcy	248	See strategic site SRA1, above.
H1/12	Blaenbaglan School (land to the rear of), Baglan	5.9	The greenfield site wraps around part of the eastern edge of the established residential area of Baglan and immediately to the rear of the school. The site's slope of approximately 1:10 is half that required to support the Snow centre. Furthermore the site is accessible for residential roads and country lanes only and lacks the access and road-side profile necessary to support the proposed development. The site is unsuitable.
H1/14	Western Logs, Cwmafan	5.9	The brownfield site is located to the south east of Cwmafan. The site has a slope of c.1:35 which is insufficient to accommodate the proposed Snow Centre. Further, as an allocated housing site, it cannot be considered suitable or available for the leisure scheme proposed. It is also questionable whether Afan Valley Road has sufficient capacity



			to accommodate the traffic likely to be generated by the proposal. The site is considered unsuitable.
H1/17	Harbourside, Port Talbot	10	See strategic site SRA2, above.
H1/LB/13	Blaenbaglan Farm, Baglan	10.2	The greenfield site wraps around part of the eastern edge of the established residential area of Baglan. The site benefits from an extant consent and Certificate of Lawful Development. The site's slope of approximately 1:10 is half that required to support the Sno centre. Furthermore the site is accessible for residential roads and country lanes only and lacks the access and road-side profile necessary to support the proposed development. The site is unsuitable.
H1/23	Park Avenue, Glynneath	13.2	The predominantly greenfield site, located to the south of Park Avenue in Glynneath, is being promoted as a mixed use regeneration scheme comprising retail and residential elements. Glynneath is not within acceptable travel-time of target population by multiple modes. Moreover the site is flat and unable to provide the slope necessary for the Snow Centre. The site is unsuitable.
H1/28	Bryn Brych Farm, Rhos	6	Three quarters of this site has been developed in accordance with its allocation and is no longer available. The residual element is too small to accommodate the proposed development. The site is unsuitable.
H1/31	Tirbach Washery, Ystalyfera	7	This brownfield site is located at the north eastern edge of Ystalyfera. Ystalyfera is not within acceptable travel-time of target population by multiple modes. The site's topography and shape is such the site sloped west to east with the widest point being c200m and thus too small for the Snow Centre length. The site has no significant north/south slope. As such, the site is not able to provide the slope necessary for the Snow Centre. The site is unsuitable.

The only employment allocations large enough to accommodate the 4.5 hectares required for the Indoor Snow Centre, Indoor Waterpark, Indoor Activity Centre and hotel accommodation and which are not covered above are as follows:

Employment Site			
LDP Ref	Site Name	Size (Ha)	Comments
EC1/1	Baglan Bay	75	This site is allocated for employment land to meet the needs of the energy sector and the western corner of the site has been developed for this purpose - it cannot be considered suitable or available for the leisure scheme proposed. While the remaining area is large enough to accommodate the core elements of the development, the site is flat and so unable to accommodate a ground bearing snow slope. The site is not, therefore, suitable or sequentially preferable.



EC1/2	Junction 38 (M4), Margam	6	This greenfield site adjacent to the M4 is an employment allocation with the LPD and therefore not suitable for the leisure development proposed. Furthermore, the site is flat, lacking the slop necessary to accommodate the snow centre. The site itself is in an out of centre location. It is not, therefore, sequentially preferable. The site is not, therefore, suitable or sequentially preferable.
EC1/4	Land within Harbourside SRA	7	See strategic site SRA2, above.

