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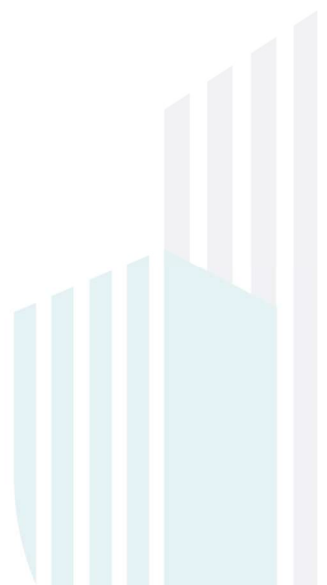
Unit D Pentrebach Retail Park, Pentrebach

Planning Statement

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T. 07908 914054 | E. jonathan@urbanagile.co.uk | www.urbanagile.co.uk

The XYZ Building, 2 Hardman Boulevard, Manchester M3 3AQ



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1 Introduction

- 1.1 This Planning Statement has been prepared by Urban Agile Limited on behalf of Pure Gym Limited ('PureGym') and supports a full planning application at Unit D Pentrebach Retail Park. The planning application seeks permission for the flexible change of use of Unit D from Class A1 to Class D2.

The Application Site

- 1.2 Pentrebach Retail Park (also known as Triangle Business Centre) is located adjacent to the A4060, approximately 1km to the south of Merthyr Tydfil. It current comprises seven retail warehouse units and a smaller retail pod occupied by Greggs. Existing occupiers include Dreams, Halfords, Iceland and Ruggers.
- 1.3 Unit D is a modern, freestanding unit that has been occupied by Sports Direct with a service yard to the side elevation. It provides existing floorspace of 1,530 sq. m over ground and mezzanine levels. The site is surrounded by commercial uses including offices and a freestanding Co-op store. To the opposite side of the A4060 dual carriageway there is a large care home know as Greenhill Manor.

Planning History

- 1.4 Planning permission for Unit D was granted in 1998 as a non-food retail unit (ref. P/98/0360). In 2014, the Council issued a lawful development certificate to confirm that, in absence of any conditions controlling the retail use, the unit benefited from unrestricted Class A1 use (ref. P/14/0261). We also note that planning permission was granted at the retail park in 2017 for the *'Change of use of Unit C3 from retail (Use Class A1) to a flexible use for an indoor trampoline park (Use Class D2) and its reversion to an A1 retail use'* (ref. P/17/0150). This permission was not implemented and Unit C3 has since been occupied as an extension to the existing Home Bargains store at the retail park.

The Proposed Development

- 1.5 This planning permission seeks permission for the following development:
- 'Change of use from Class A1 (retail) to a flexible use for Class D2 (gym) or reversion to Class A1 use.'*
- 1.6 The purpose of the proposal is to secure permission for use as a gym within Class D2 but to provide appropriate flexibility to enable Unit D to revert to the existing Class A1 retail use at a future point. The description of development is therefore similar to that previously permitted by the Council in respect of Unit C3 under permission ref. P/17/0150.
- 1.7 The proposed gym is to be operated by PureGym, the UK's largest gym group with over 300 sites and more than 1 million members. PureGym's success is based on providing access to high-quality fitness facilities on an affordable and flexible, no-contract basis. Its digital offer is particularly strong and includes free and paid-for workout plans. The nearest existing

PureGym site is at Gallagher Retail Park in Caerphilly, approximately 15 miles to the south-east of Merthyr Tydfil.

- 1.8 Every gym provides an excellent range of fitness equipment and machinery, with a range of gym classes and other services such as personal training. Gyms operate on a 24-hour basis, seven days a week, providing access to the whole community, including those who work irregular shift patterns such as key workers. Each site typically provides up to 15 full and part-time jobs including management roles, personal trainers, gym instructors and cleaners.
- 1.9 The proposed gym at Pentrebach Retail Park is expected to comprise a main gym area, free weights area, functional zone and dedicated spaces for group exercise classes. In addition, changing facilities and showers will be provided, together with separate staff areas. The existing mezzanine within Unit D will be removed as part of the change of use, reducing the overall floorspace within the unit from 1,530 sq. m to 1,110 sq. m.

Figure 1.1 - Typical PureGym interior



Structure of this Statement

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

2 Relevant Planning Policy

- 2.1 In this section we summarise the planning policy that is relevant to the consideration of the proposed development. This includes Planning Policy Wales (PPW) and the development plan for Merthyr Tydfil which currently comprises the adopted Replacement Local Development Plan 2016 - 2031.

National Planning Policy

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

Local Planning Policy

- 2.5 The Merthyr Tydfil Replacement Local Development Plan (LDP) was adopted in January 2020 and sets out key objectives for the Borough including LDP Objective 15 which seeks to support sustainable tourism, leisure and recreation developments. Relevant policies within the LDP are summarised as follows:
- Policy SW11 (Sustainable Design and Placemaking) – this policy states that development must contribute to the creation of attractive and sustainable places through high, quality, sustainable and inclusive design. It sets out a number of criteria that may be appropriate to new development including being appropriate to its local context, not resulting in unacceptable impact on local amenity, allowing access for the widest range of people possible and demonstrating that any traffic movements will not have an unacceptable impact on amenity or highway safety, promoting the creation of healthy and active environments, and reducing opportunities for crime and anti-social behaviour.
 - Policy SW13 (Protecting and Improving Local Community Facilities) – states that the provision of new and enhanced community facilities will be supported subject to satisfying other relevant LDP policies. Paragraph 6.4.90 of the LDP confirms that

community facilities perform various functions that cover a broad range of activities and services that can be delivered by the public, private and third sectors, including leisure and recreational facilities.

- Policy EnW4 (Environmental Protection) – proposals will be required to demonstrate that they will not result in an unacceptable impact on people, residential amenity, property and/or the natural environment including through noise, vibration, dust, odour nuisance and light pollution, or any other identified risk to public health and safety.
- Policy EcW7 (Tourism, Leisure and Recreation Development) – this policy states that tourism, leisure and recreation development within settlement boundaries is generally supported.

3 Principle of the Proposed Development

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

Improving Community Facilities and Healthy Environments

- 3.2 One of PPW's key planning principles is to facilitate accessible and healthy environments, including by promoting mental and physical well-being. Policy SW13 of the LDP seeks to support new local community facilities, including leisure and recreation facilities that are delivered by the private sector. Merthyr Tydfil has lower life expectancy for both males and females when compared to the average for Wales and scores for mental and physical health are worse than the Welsh average. 65% of adults in Merthyr Tydfil do not meet physical activity recommendations and 62% of adults have obesity or excess weight (Sources: Wales Centre for Health and British Heart Foundation).
- 3.3 PureGym is at the forefront of the affordable health and fitness sector which serves to extend access via low-cost membership and flexible terms, providing high quality and accessible gym facilities to all members of the community, including shift workers at nearby employment sites who will be able to make use of 24-hour opening.
- 3.4 The flexible, low-cost offer is particularly attractive to those on lower incomes. This in turn promotes healthier lifestyles, participation in sport and other recreational activities, and consequently delivers social and economic benefits. Approximately a third of PureGym members have not previously been members of a gym or health club and the proposed development will therefore help to promote healthy and inclusive communities, whilst supporting a reduction in health inequalities. The proposal will therefore support the relevant objectives of PPW and Policy SW13 of the LDP.

Sequential Assessment

- 3.5 Policy EcW7 of the LDP states that leisure and recreation uses within existing settlement boundaries will generally be supported and the development of leisure facilities at Pentrebach Retail Park would accord with this element of the development plan. Planning permission has previously been granted for Class D2 use at the retail park in 2017 (ref. P/17/0150). This permission has not been implemented, with Unit C3 now forming part of an extension to the existing Home Bargains store.
- 3.6 Nevertheless, we note that PPW also requires the application of a sequential test when considering the location of new retail and commercial development. The application site is in an out-of-centre location, approximately 1.5 km to the south of the defined boundaries of Merthyr Tydfil Town Centre. As such and to demonstrate a robust and policy-compliant approach, we have considered the availability and suitability of alternative sites within sequentially preferable locations.

Area of Search and Flexibility

- 3.7 The proposed gym is intended to primarily serve residents of the Merthyr Tydfil urban area, including Pentrebach and Troedyrhiw to the south. As such, this contiguous built-up area is considered to comprise the primary catchment area. Within this area, the Proposals Map associated with the LDP identifies the town centre at Merthyr Tydfil and five local centres at Brecon Road, Cefn Coed, Dowlais, Gurnos and Troedyrhiw. Given the scale and nature of the proposed development, our sequential assessment is focussed on alternative sites within and on the edges of the town centre. However, we have also had regard to the local centres where appropriate.
- 3.8 PureGym intends to operate one of its large-format gyms at Pentrebach Retail Park with floorspace of 1,110 sq. m. As a budget gym operator, ancillary facilities at PureGym are kept to a minimum and do not include features that might be found in health clubs such as swimming pools or customer cafes. The proposed gym will therefore provide a secure entrance, changing rooms with toilet and shower facilities, areas for cardiovascular fitness machines, functional fitness equipment, weight machines and free weight equipment, together with dedicated spaces for fitness classes. In addition, there will be spaces for staff and other back-of-house facilities and circulation space (including stairs and lifts where appropriate). Adequate circulation space is considered to be particularly important following the pandemic.
- 3.9 All these elements are considered to be essential as core components of the PureGym offer. Smaller sites may not be suitable for PureGym if they require elements of this core offer to be removed or do not provide the flexibility to adapt to social distancing (following the extended closure of gyms during the pandemic this is considered to be critical to future business resilience). With this in mind, suitable alternative sites should provide +/- 10% of the proposed floorspace of 1,110 sq. m. Alternative sites could therefore be considered that provide between approximately 1,000 sq. m and 1,350 sq. m of floorspace. Such sites must provide large floorplates to accommodate the necessary equipment and facilities, and appropriate ceiling heights.
- 3.10 In addition, alternative sites must have good access to car parking (preferably dedicated, free car parking). Whilst a reasonable proportion of gym users will travel by more sustainable modes, many will do so as part of existing vehicle trips. The busiest times of the gym will be on weekdays between 7 and 9am and between 5 and 7pm. This reflects the fact that many members will choose to use the gym before or after the normal working day and will travel to the gym on the way to or from their place of work. The absence of suitable car parking will significantly inhibit these elements of the proposed gym's trade and may compromise the viability of any alternative site.
- 3.11 Finally, we note that alternative sites should ideally be available immediately or within a period of 12 months from the date of this application. This represents a reasonable period for the delivery of the applicant's proposed investment and realisation of its identified benefits.

Sequentially Preferable Sites

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

at Table 3.1. For completeness, we have listed all sites that provide floorspace of more than 100 sq. m.

Table 3.1 Available Sites within Merthyr Tydfil Town Centre

Site Address	Comments
Unit 2 Beacons Place	This unit provides floorspace of 187 sq. m over ground and first floor with Beacons Place Shopping Centre. The available floorspace is significantly smaller than the proposed development and is therefore unsuitable.
10 Graham Way	A small corner unit within St Tydfil Shopping Centre providing floorspace of 109 sq. m at ground level. On the basis of its floorspace alone, this site is unsuitable for the proposed development.
10a Graham Way	A ground floor retail unit within the St Tydfil Shopping Centre that was previously occupied by Wilko. It provides floorspace of 785 sq. m. As such, this unit is over 300 sq. m smaller than the proposed floorspace at the application site. The shopping centre is not currently open on a 24-hour basis and car parking is some distance to the west adjacent to the A4054, compromising the accessibility and safety of this site. As such, this unit would not be suitable for the proposed development.
10b Graham Way	Another ground floor unit providing floorspace of 990 sq. m, below the search parameters identified. In addition, and as noted above, the site provides poor access for those travelling by car and at night. We note that many members visit the gym daily and as part of existing commuter trips. In combination, these constraints make this site unsuitable for the proposed development.
43-35 High Street	This ground floor property provides 1,003 sq. m of floorspace and comprises three adjoining retail units. However, it is only available on a freehold basis with the majority of the floorspace occupied by Heron Foods which does not have a break in its lease until 2028. The two smaller units are also currently occupied. This site is therefore considered to be unavailable for the purposes of the proposed development.
12 Market Square	This is a small ground floor unit providing floorspace of 119 sq. m. At around 10% of the proposed floorspace at the application site, this unit is clearly unsuitable for the proposed development.
3 New Market Walk	Located on the edge of St Tydfil Shopping Centre, this unit provides 371 sq. m at ground floor and 217 sq. m at basement level. The total floorspace of 588 sq. m is significantly smaller than the proposed floorspace at the application site and this site is therefore unsuitable.
10-11 New Market Walk	This unit provides 237 sq. m of floorspace at ground floor within St Tydfil Shopping Centre. On the basis of its size alone, this unit is unsuitable for the application scheme.

- 3.13 The largest available property within Merthyr Tydfil Town Centre is at 43-45 High Street. However, this property is available on a freehold basis with sitting tenants and is unlikely to become available for alternative tenants until 2028. The next largest available units in the town centre are within the St Tydfil Shopping Centre. These units fall outside of the search parameters that have been identified above and it would be necessary to remove core elements of the proposed gym to fit the proposed development into these sites. Furthermore, the shopping centre is not open 24 hours a day and car parking is located more than 200 metres to the west, on the opposite side of the River Taff. This will not provide appropriate access for regular gym users or those using the gym at night. All other available units that we have identified within or on the edges of the town centre are considerably smaller than the application site and therefore unsuitable for the proposed development.
- 3.14 We have also sought to identify alternative sites within relevant local centres in Merthyr Tydfil. All these centres are traditional, tightly bounded centres or small neighbourhood parades containing small commercial units. As such, we have not identified any sequentially preferable sites within or on the edges of these local centres.
- 3.15 This review of sequentially preferable sites has therefore demonstrated that, having regard to an appropriate degree of flexibility, there are no alternative sites that are both available and suitable for the proposed development. The proposal therefore accords with the relevant provisions of paragraphs 4.3.18 to 4.3.24 of PPW.

Promoting Sustainable Economic Growth

- 3.16 Both PPW and the LDP seek to support sustainable economic growth. The application scheme will deliver a long-term investment in this part of the County Borough and will provide a high quality but affordable fitness facility that will serve to diversify the existing leisure and service offer within Merthyr Tydfil. The flexible format of the PureGym concept, including its 24-hour opening and the absence of fixed term contracts, will support flexible working and enable the benefits of gym membership to be enjoyed by all members of the local community.
- 3.17 The proposal will also support new investment at Pentrebach Retail Park, introducing a national gym operator, diversifying the range of leisure uses available and encouraging further commercial investment including in adjoining employment areas (with this type of facility being attractive for potential occupiers). In addition, the proposed development will make the efficient use of existing land and buildings (avoiding any long period of vacancy) and create up to 15 full and part-time jobs. These jobs will prove particularly attractive to younger people with access to the PureGym Academy which provides career diplomas in gym instruction and personal training.

Summary

- 3.18 In summary, the proposed development is acceptable in principle. It will support sustainable economic development within this part of Merthyr Tydfil, creating new jobs, increasing the range of affordable and accessible health and fitness facilities available within the County Borough and contributing to the health and wellbeing of the local community, in accordance with the objectives of PPW and Policies SW13 and EcW7 of the LDP. It has also been

demonstrated that the proposal will accord with the sequential approach for leisure uses set out within PPW.

4 Other Matters

Amenity and Security

- 4.1 PureGym operates on a 24-hour basis, 7 days a week to enable its members, including those who work shifts and key workers, to fit their fitness regimes around their working patterns. The use of the application site as a gym and its 24-hour operation will not have any adverse impacts on neighbouring properties.
- 4.2 Unit D Pentrebach Retail Park is a freestanding commercial unit that is surrounded by other commercial uses and is adjacent to the A4060 dual carriageway. Group exercise classes are not held at night and the number of visitors to the gym at night will be relatively low. On weekdays, there will typically be an average of 10-15 visitors per hour between 2300 and 0600 (falling to 5 or fewer per hour during the early hours), with lower numbers at weekends. Gym members normally arrive individually and are almost certain to do so during night-time hours. Those who arrive by car at these times will be able to park as closely to the gym entrance as possible. There will consequently be no issues with noise, groups of people or any sort of anti-social behaviour.
- 4.3 In terms of security, access to the gym will be controlled at all times via secure entry pods, which can only be operated by the use of an 8-digit PIN code that is individual to each member. This PIN is also required to access changing rooms and the gym will be covered by an extensive CCTV network. There will also be 'Help' points located throughout the gym which will allow staff at an alarm receiving centre to communicate with those on site. Such systems operate successfully at over 300 existing PureGym sites.
- 4.4 It is therefore clear that the proposed use will have no adverse impacts on amenities and that significant safeguards will be put in place as part of the standard fit-out and operation of the gym to prevent crime and anti-social behaviour. The proposal will therefore accord with the relevant requirements of Policy EnW4 of the LDP.

Transport and Access

- 4.5 The application site is accessible via various modes of transport, including on foot with footpaths connecting the retail park to the residential areas to the south. There are four bus stops within 100 metres of the application site on Merthyr Road (A4054) and at the entrance to Pentrebach House. These provide access to regular services between Aberfan, Bedlinog, Merthyr Tydfil, Pontypridd and intervening destinations. The railway station at Pentrebach is approximately 200 metres to the south of the application site providing services at up to 10-20 minute intervals to Merthyr Tydfil and destinations including Barry Island, Bridgend and Cardiff Central. The application site therefore enjoys good accessibility and is sustainably located.
- 4.6 The application site is also well placed to cater for linked trips for commuters, those working at Triangle Business Centre, the Hoover distribution centre and Dragon Parc, and also to visitors to other retail facilities at Pentrebach Retail Park. Access and parking facilities at the application site are well established and we are not aware of any issues with their operation. The car park at the retail park currently provides parking for approximately 285 vehicles.

- 4.7 It should be noted that the proposed development will reduce the floorspace of the application site by 420 sq. m and that parking demand associated with the gym would fall outside of the peak trading times of the neighbouring retail units i.e. early morning and early evening on a weekday. Fewer members would use the gym at a weekend, when neighbouring retail facilities are likely to be at their busiest. The existing car parking arrangements are therefore sufficient to meet parking requirements associated with the proposed gym use and the change of use will not have any material impacts on the operation of the highway network.
- 4.8 The servicing requirements of the proposed gym are minimal compared to the permitted retail use at the application site and it will generate significantly fewer delivery/waste collection vehicle movements. It is therefore considered that the proposals will accord with Policy SW11 of the LDP.

5 Summary and Conclusions

- 5.1 This Planning Statement has been prepared to support a planning application for the change of use of Unit D Pentrebach Retail Park. The proposed change of use is intended to enable the occupation of the application site by PureGym and the operation of a high quality, affordable 24-hour fitness facility. Planning permission is sought on a flexible basis to allow Class D2 (gym) use or the reversion of Unit D to Class A1 (retail) use.
- 5.2 This Statement has demonstrated the acceptability of the proposed development in terms of national and local planning policy. We have demonstrated that the application scheme will deliver sustainable economic growth in accordance with PPW and the Merthyr Tydfil County Borough LDP, provide new employment opportunities for up to 15 people and create real social benefits in terms of providing affordable and accessible fitness facilities that will promote the health of local communities. This will serve to reduce health inequalities within Merthyr Tydfil and address existing health issues within the Borough including life expectancy figures that are well below the Welsh average and high levels of physical inactivity and obesity.
- 5.3 A sequential assessment has been carried out which has found that there are no available and suitable alternatives to the application site in sequentially preferable locations. Policies SW13 and EcW7 of the LDP are supportive of the development of leisure uses, especially where these comprise community facilities such as gyms, within defined settlement boundaries. In this case, the proposal involves a change of use on an existing retail park and will result in a reduction in overall floorspace at the site. The proposed change of use is therefore acceptable in principle.
- 5.4 The location of the proposed gym is highly accessible, served by adequate car parking and providing access to good-quality public transport facilities. The application site is a freestanding building in a commercial area that is adjacent to a dual carriageway. The operation of a gym will not have any unacceptable impacts on the amenities of neighbouring properties. PureGym adopts extensive measures to ensure a safe and secure environment for its members. The proposal will therefore also accord with the relevant provisions of Policies SW11 and EnW4 of the LDP.
- 5.5 We therefore consider that this proposal meets all relevant requirements of local and national planning policy, and we commend this planning application to the Council.

