

**Unit 2 Cyfarthfa North
Cyfarthfa Retail Park, Merthyr Tydfil**

Proposed Change of Use from Class A1 Use to Class D2 Gym use

Planning Statement

January 2023



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1. The Proposal

- 1.1 This Planning Statement is submitted in support of a planning application made on behalf of Corona Vulcan Merthyr Limited, the owner of Cyfarthfa Retail Park, for the proposed change of use of Unit 2, Cyfarthfa North, from Class A1 use to Class D2 gym use.
- 1.2 Unit 2 is currently occupied by Oak Furnitureland. The change of use is proposed in order to allow the unit to be occupied by a national multiple low cost gym operator.¹
- 1.3 There are no national multiple low cost gym operators in Merthyr Tydfil and national multiple gym operator representation overall in Merthyr Tydfil is currently limited to the Everlast gym at Unit 1, Cyfarthfa Retail Park. The occupation of Unit 2 Cyfarthfa North by a national multiple low cost gym operator will provide additional affordable choice in health and fitness facilities for the local population.
- 1.4 The Unit has a ground floor gross internal area of 956sqm and a mezzanine floor measuring 826sqm. The total gross internal area is 1,782sqm. ² This is sufficient floorspace to meet the business model requirements of national multiple low cost gym operators.

¹ Unit 2 Cyfarthfa North, Cyfarthfa Retail Park is identified as Unit 15 Cyfarthfa Retail Park on the Planning Portal

² SqM figures rounded

2. The Site & Relevant Planning History

- 2.1 Unit 2 forms part of Cyfarthfa North which was developed as the second phase of the Cyfarthfa Retail Park development. The Cyfarthfa North development was approved under Planning Permission P/12/0219, dated 14 March 2013, and amended under Planning Permission P/13/0156 dated 5 August 2013.
- 2.2 The Cyfarthfa North site consists of three retail units and associated car parking and servicing. Unit 1 is occupied by B&Q. Unit 2 is occupied by Oak Furnitureland. Unit 3 is occupied by Pets at Home. Under condition 29 in Planning Permission P/13/0156, the retail units are restricted to the sale of bulky non-food goods only.
- 2.3 Planning Permission P/17/0105 dated 31 May 2017 permitted the installation of a mezzanine floor in Unit 2.³

³ In planning permission P/17/0105 the unit is referred to as Unit 15, Cyfarthfa Retail Park

3. Planning Policy Overview

The Development Plan

- 3.1 Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 (the LDP) paragraph 6.7.26 states that Cyfarthfa Retail Park provides “*an established out-of-centre retail park in close proximity to the Town Centre.*”
- 3.2 Policy EcW3 identifies that Merthyr Tydfil Town Centre is the favoured location for retail, leisure, and other complementary development, being situated at the head of a retail hierarchy and being followed by the local centres of Dowlais, Gurnos, Cefn Coed and Brecon Road/Morgantown, Troedyrhiw, Aberfan, Treharris and a new local centre forming part of the ‘Hoover Strategic Regeneration Area’.
- 3.3 Policy EcW7 states that tourism, leisure and recreation development within settlement boundaries is “*generally supported*”. Paragraph 6.7.58 states that, in line with the Welsh Government’s ‘town centres first’ principle a sequential approach will be adopted when determining applications for complementary uses such as leisure facilities where these are proposed outside a Town Centre location.
- 3.4 Policy SW11 states that where appropriate ‘new development’ will be required to allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council’s parking standards.
- 3.5 Cyfarthfa North is located within the Cyfarthfa Conservation Area and Cyfarthfa Urban Character Area. The application proposal is for a change of use and does not include any external alterations to the premises (which will be the subject of a separate application if necessary). The application proposal does not, therefore, raise any issues in terms of impact on the character and appearance of the Conservation Area and no assessment is required under Policy CW1: The Historic Environment.

Planning Policy Wales

- 3.6 Planning Policy Wales (PPW)⁴ (paragraph 3.19) states that the built and natural environment is a key determinant of health and well-being and that the planning system has an important role in shaping the social, economic, environmental and cultural factors which determine health and which promote or impact on well-being in line with the Healthier Wales goal. It states that the way places work and operate can have an impact on the choices people make in their everyday lives, including their travel and recreational choices and how easy it may be to socialise with others.
- 3.7 PPW paragraph 4.3.18 states that under the 'town centres first' policy planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses.
- 3.8 If a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out-of-centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered (PPW paragraph 4.3.19).

⁴ Edition 11, February 2021

4. Assessment

Sequential Test

- 4.1 Merthyr Tydfil Town Centre is the relevant centre to be assessed. Local centres identified under LDP Policy EcW3 are not included. This reflects the local shopping function of the Local Centres and that the LDP identifies Cyfarthfa Retail Park as a preferred location for meeting needs that cannot be accommodated in the Town Centre.
- 4.2 Merthyr Tydfil Town Centre is generally characterised by having small unit sizes.
- 4.3 An assessment of the suitability of premises that are currently being marketed in the Town Centre is set out at Appendix 1.
- 4.4 In terms of suitability, the assessment in Appendix 1 adopts reasonable flexibility having regard to the need that the application proposal will meet, which is to accommodate a national multiple low cost gym operator in a unit of broadly (but not exactly) the size proposed (1,782sqm).
- 4.5 The largest unit being marketed in the Town Centre is Unit 10b, Graham Way, St Tydfil Shopping Centre, which is 990sqm ground/460sqm basement and only provides 1,450sqm floorspace overall. This equates to only 81% of the gym floorspace proposed in the application and is too small to accommodate the application proposal adopting reasonable flexibility. This unit is also unsuitable as it does not provide adjacent free surface level car parking which is an important characteristic of the suitability of the application site to accommodate a national multiple low cost gym operator.
- 4.6 The assessment at Appendix 1 demonstrates that there are no available opportunities in the Town Centre that are suitable to accommodate the application proposal adopting reasonable flexibility.
- 4.7 No suitable, more accessible, opportunities have been identified on the edge of the Town Centre that are available to accommodate the application proposal adopting reasonable flexibility.
- 4.8 It is therefore concluded that the application proposal passes the sequential test.

Traffic Impact

- 4.9 Policy SW11(5) states that where appropriate ‘new development’ will be required to allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council’s parking standards.
- 4.10 Unit 2 already exists, and forms part of an established and accessible commercial location, and the proposal does not involve the creation of any additional floorspace. In these circumstances it is clear that the proposed change of use to gym use is not likely to have any material impact on amenity or any significant adverse traffic impact. The proposal will also not result in any additional car parking requirements compared with the established use of the premises.
- 4.11 The proposal will widen the mix of uses at Cyfarthfa North, facilitating linked trips and reducing the need to travel.

Other Material Considerations

- 4.12 In accordance with PPW (paragraph 3.19) the proposed gym will provide a new affordable facility for local people to meet their health and fitness needs and to socialise, and therefore promotes health and well-being in line with the Healthier Wales goal.
- 4.13 It is noted that in approving an application (P/21/0387) for a change of use from industrial use to gymnastics facility at Unit 6 – 7 Cyfarthfa Industrial Estate, the LPA attached significant weight to the contribution that the proposal would make to meeting well-being objectives; i.e.

“The duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under Section 3 of the Well-Being of Future Generations (Wales) Act 2015 (“the WBFG Act”) has been taken into consideration when determining this application. In reaching the following recommendation, the ways of working set out at section 5 of the WBFG Act have been considered and thus its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.”

- 4.14 The well-being benefits of the proposed gym use at Unit 2 Cyfarthfa North also weigh in favour of the application being approved.

5. Conclusions

- 5.1 The proposed change of use of Unit 2 Cyfarthfa North, from Class A1 use to Class D2 gym use, will facilitate the occupation of Unit 2 by a national multiple low cost gym operator providing additional affordable choice in health and fitness facilities for the local population and contributing to well-being in line with the Healthier Wales goal.
- 5.2 The sequential test assessment has demonstrated that there are no suitable opportunities available within or on the edge of Merthyr Tydfil Town Centre to meet the need that the application proposal will meet adopting reasonable flexibility.
- 5.3 The proposal will widen the mix of uses at Cyfarthfa North, facilitating linked trips and reducing the need to travel.
- 5.4 Unit 2 already exists, and forms part of an established and accessible commercial location, and the proposal does not involve the creation of any additional floorspace. In these circumstances it is clear that the proposed change of use to gym use will have no impact on amenity and is not likely to have any significant adverse traffic impact or result in any additional car parking requirements.
- 5.5 The proposal is consistent with the LDP and PPW and should be granted planning permission.

APPENDIX 1

Merthyr Tydfil Town Centre – Vacant/Marketed units January 2023

Address	Size	Assessment
Unit 2 Beacons Place	Ground – 80sqm First – 106sqm Total – 186sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 5, Graham Way, St Tydfil Shopping Centre	Ground – 135sqm Total – 135sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 9a, Graham Way, St Tydfil Shopping Centre (under offer)	Ground - 273sqm Total – 273sqm	Too small to accommodate the application proposal adopting reasonable flexibility Conclusion: not suitable
Unit 10, Graham Way, St Tydfil Shopping Centre	Ground – 112sqm Total – 112sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 10a, Graham Way, St Tydfil Shopping Centre	Ground – 484sqm Basement – 300sqm Total – 784sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 10b, Graham Way, St Tydfil Shopping Centre	Ground – 990sqm Basement – 460sqm Total – 1,450sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
8 River Walk, St Tydfil Shopping Centre	Upper Floor Level – 1,021sqm Total – 1,021sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
3 Glebeland Street	Basement – 30sqm Ground – 57sqm First – 42sqm Second – 39sqm Total – 169sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
56 – 57 Glebeland Street	Ground – 82sqm Total – 82sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
30 – 31 Lower High Street	Ground – 71sqm Basement – 37sqm Total – 108sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable

59 High Street	Ground – 92sqm Basement – 46sqm Total – 138sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
119 High Street	Ground – 177sqm Total – 177sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
Unit 2, Lower High Street	Ground – 236sqm Total – 236sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
12 Market Square	Ground – 118sqm Total – 118sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
16/18 Market Square	Ground – 247sqm Total – 247sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
3 New Market Walk	Ground – 371sqm Total – 371sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
10 – 11 New Market Walk	Ground – 237sqm Total – 237sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable
37 Victoria Street	Ground – 81sqm First – 55sqm Total – 136sqm	Too small to accommodate the application proposal adopting reasonable flexibility. Conclusion: not suitable

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