

PLANNING, RETAIL AND DESIGN AND ACCESS STATEMENT

UNITS 2 & 3A

LAKESIDE RETAIL PARK

BLAINA ROAD

BRYNMAWR

NP23 4SL

PREPARED ON BEHALF OF

CDS (SUPERSTORES INTERNATIONAL) LTD

August 2022

MWA

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Appendices:

Appendix [1] Copy of planning permission No. C/2004/0050 dated 17th June 2004.

Appendix [2] Copy of planning permission No. C/2006/0519 dated 8th December 2006.

Appendix [3] Copy of planning permission No. C/2021/0345 dated 28th April 2022.

Appendix [4] Planning officer's report in respect of App. No. C/2021/0345.

Appendix [5] Retail impact tables.

1.0 INTRODUCTION

- 1.1 CDS (Superstores International) Ltd trading as The Range proposes to occupy Units 2 and 3A at Lakeside Retail Park on the edge of Brynmawr Town Centre. In order to enable beneficial occupation of the units, the Applicant requires the ability to construct an internal trading mezzanine extending to 1,425 sq.m. gross, equating to a trading (sales) area of 1,205 sq.m.
- 1.2 Home Bargains (Unit 2) will occupy a new unit on the NMC factory site later this year. Unit 3A was occupied by Peacocks and is vacant. The current application by The Range would therefore enable beneficial occupation of the two units, creating new employment and attracting substantial private sector investment in the retail park at no cost to public funds.
- 1.3 The following plans are submitted with the application:

Drawing	Drawing No.	Scale
Site location plan	0000-100	1: 1250
Existing Elevations	0000-200	1: 100 @ A1
Proposed Elevations	0000-300	1: 200 @ A1
Proposed Ground and Mezzanine Floors	0000-400	1: 100 @ A1 1: 200 @ A1

- 1.4 The report is set out as follows:

Section 2 – This describes the trading characteristics of The Range including its business model. We also summarise the relevant planning history and describe the proposed development.

Section 3 – The planning policy framework is summarised including the statutory development plan. Non-statutory considerations include Planning Policy Wales (2021).

Section 4 - This section reviews the most recent information on shopping patterns contained within the Blaenau Gwent Retail and Leisure Study (August 2021)(BGRLS) prepared by Williams Gallagher and Reeves Retail.

Section 5 – The provides information on quantitative and qualitative need having regard to PPW.

Section 6 - This demonstrates the acceptability of the proposal against the sequential test.

Section 7 - Our approach to impact assessment is provided based on data within the BGRLS.

Section 8 – Details are provided on the material considerations favouring the grant of consent.

Section 9 – The section provides a summary of our overall conclusions.

2.0 THE RANGE AND THE PROPOSED DEVELOPMENT

(i) The Range concept

- 2.1 CDS originated in the South-West where its first store on Fore Street in Exeter commenced trading in 1984. However, soon after there was a realisation that customers were willing to buy a wider range of products and, as such, further retail space in out of centre locations was required. CDS opened its first 'superstore' at Sugar Mills Business Park in Plymouth in 1988 where the administration headquarters of the company remain today.
- 2.2 During the early 1990s the company directors developed the store concept in greater depth and realised that further expansion required a change in the nature of the business. A second company - CDS (Furnishing and Fabrics) Limited - was established through a desire to see the business expand on a broader front. Its first store was opened in Exeter in 1996, followed by Plymouth in 1997 and Newport in 1998. In August 1998, the two companies merged, primarily to enable CDS to present a sharper focus to their customer base.
- 2.3 During October 1998 the first Range concept store was opened in Cardiff. The store represented a whole new concept for the company and based itself around the 'homewares' market and the interests in 'lifestyle' that have dominated the recent retailing market. The new concept sought to concentrate on the home and garden from a lifestyle angle, rather than the DIY angle which was considered to be a saturated market. More stores were opened, and older CDS stores were rebranded utilising these principles.
- 2.4 Turning to the retail concept, The Range aim to offer 'mid-price' home and garden products, drawing together everything that could be needed for the home at 'affordable' prices. This all-encompassing product range is considered to be unique in the UK market (i.e. no other retailers currently cater for all aspects of the home from a lifestyle angle), and it is one that demands a large amount of retail space, good design and a comprehensive buying ability to ensure a consistent supply of interesting and often unique stock.
- 2.5 The core element of the product range is the complementary nature of many of the products and the synergy that exists between the ranges. The idea is to draw customers to the different areas and become a one-stop shop for home and garden products. The principal product lines are:

- Furniture and textiles (and other items associated with the improvement of the home);
- Camping and bulky leisure goods – these include tents and associated products (but not outdoor clothing) and garden play equipment and toys (swings, pools, slides);
- Household and garden goods – these include items such as plastic storage, rotary lines, dustbins, ironing boards, cooking utensils, tableware, pots, pans, and ceramics;
- DIY and lighting;
- Office supplies; and
- Pet products.

2.6 The above goods all form an integral part of The Range’s business model, with a store typically stocking a product line of approximately 65,000 items. The range of goods are predominantly bulky in nature, and the offer is entirely different to say John Lewis for example, who operate at the higher end of the home and leisure market.

2.7 The Range currently has a portfolio of over 200 stores nationwide.

2.8 The Range does not tend to operate either within a town or city centre due to the retailer’s space requirements and, significantly, the inability to afford greater rent in prime retail locations.

2.9 The Range’s smallest store (which is notably too small) is 1,680 square metres gross at Burton-on-Trent and the largest store is over 8,000 square metres gross. In order to stock the full range of products, the company normally requires a minimum store size of 3,500 square metres gross (3,000 square metres net sales). Any smaller and The Range would be limited to selling a reduced range of products. The Range trade from a cross-section of stores. The largest is at Gateshead which extends to approximately 8,000 sq.m. gross. The smallest stores are between 1,680-2,200 sq.m. gross and which normally do not contain a garden centre. In this context the proposed mezzanine will enable the company to maximise the number of goods which can be displayed and sold. Without it the company would be unable to provide a sufficient range of products to be commercially viable and attractive to customers.

2.10 Table 2.1 summarises the company’s classification of the various groups of store by size in June 2020.

Table 2.1: Size distribution of The Range stores (2020)

Category	Floorspace range sq.m. gross excluding garden centres	No of stores	No. with garden centres
1	6,131-8,039	8	6
2	5,587-6,039	7	6
3	4,933-5,574	17	13
4	4,270-4,905	19	16
5	3,800-4,218	22	19
6	3,264-3,790	37	34
7	2,844-3,259	31	26
8	2,265-2,823	30	18
9	1,680-2,208	15	5
Total	-	186	143

- 2.11 Of the total number of stores the majority (77%) typically have a garden centre. The average store size falls within the 3,200-4,200 sq.m. gross, range.
- 2.12 Given the nature and extent of the bulky retail offer sold by The Range (with over 65,000 Stock Keep Units or SKUs), being able to trade from large floor areas (whether it is on one or two levels) is absolutely essential.
- 2.13 In terms of management and staffing, the company is structured along traditional store responsibility lines with a head office reporting and administration structure. The management is aware of the need to retain key staff (most of who are locally employed) and the effect that these people can have on the 'culture' and motivation within each retail store.
- 2.14 The store will generate around 65 employment opportunities. These direct jobs would be both full time and part time positions and, with the exception of store management, area available to local people. The Full Time Equivalent (FTE) positions are estimated to be 45, which is due to the mix of part-time and full-time positions, which create more flexibility for colleagues and the company. This level of job creation is undoubtedly significant.
- 2.15 Job opportunities within the store would be across a range of skills. In addition to jobs within the store itself, other employment opportunities will be created. These include jobs created by the store fit out and merchandising of the store, together with the involvement in the future maintenance and security of the retail unit; cleaners and security guards.

2. Relevant planning history

2.16 Planning permission No. C/2004/0050 granted on 21st June 2004 permitted the construction of the retail park¹. A copy is attached as **Appendix [1]**. Condition 16 imposed on the permission states:

The Units marked 1-4 on the approved plan in the western portion of the site shall be used for A1 non-retail use only².

2.17 In addition condition 15 prevents the installation of mezzanine floors:

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995, no retail mezzanine floors shall be inserted into the buildings hereby approved.

2.18 Condition 17 restricted the overall maximum floorspace within Units 1-4 to 3,500 sq.m. It also restricted any sub-division but did not preclude amalgamation.

2.19 The three conditions were imposed because the impact of the development on the adjacent centre has been considered in the light of the submitted information only. They do not specifically refer to the impact on the vitality and viability of existing centres.

2.20 Planning permission No. C/2006/0519 dated 8th December 2006 varied the terms of condition 16 imposed on planning permission No. C/2004/0050. A copy is attached as **Appendix [2]**. The condition states:

The units marked 1-4 on the approved plan shall be used for non-food use only;

(a) Except Unit 1A may be used for the sale of food which shall be predominantly frozen food and shall not exceed 465 sq.m. For the avoidance of doubt, "predominantly" shall mean that freezer cabinets shall occupy not less than 60% of the sales floor area (excluding circulation space and checkouts).

(b) Un unit 2, a maximum of 30% of the net floorspace may be used for the sale of pre-packaged food and drink products. For the avoidance of doubt, this consent shall not extend to the sale of frozen or fresh produce. Fresh produce is defined as produce with a normal shelf life of less than 28 days.

2.21 This condition was imposed in order to protect the long term vitality and viability of Brynmawr Town Centre. All the goods proposed to be sold from The Range store fall within the ambit of non-food goods.

2.22 Subsequently the Council granted planning permission No. C/2021/0345 dated 28th April 2022. A copy of this permission is attached as **Appendix [3]**. This varied condition 16(b)

¹ Construction of A1 food and non-food retail units and A3 family pub.

² We assume that refers to the use of the units for "non-food retail use only."

imposed on planning permission No. C/2006/0519 to permit the sale of convenience goods from units 2 and 3A not exceeding 1,441 sq.m. gross. This permission has not been implemented although as we discuss in Section 4 of our report, it is of relevance in so far as the Council accepted that the proposal met the sequential and impact tests.

3. Site location and context

2.23 Units 2 and 3A lie within the terrace of units along the western portion of the site. There are seven units in the terrace as summarised in Table 2.2.

Table 2.2: Units within the retail park

Unit	Occupier	Sq.m. gross
1A	Farmfoods	465
1B	Poundland	465
2	Formerly Home Bargains	930
3A	Formerly Peacocks	511
3B	Halfords	465
4A	Card Factory	273
4B	Pets at Home	368

2,24 The application site encompassing Units 2 and 3A therefore have a gross internal floor area of 1,441 sq.m.

2.25 Th retail park lies to the south of Brynmawr town centre and is accessible to and from the centre by car, on foot and by cycle. It is agreed by the Council as comprising an edge of centre retail destination.

4. The proposed development

2.26 The proposal is summarised in Table 2.3:

Table 2.3: Existing and proposed gross and net floorspace (sq.m.)

Existing floorspace	Sq.m. GIA
Unit 2	930
Unit 3A	511
Proposed ground floor	
Gross	1,441
Net (sales)	1,298
Proposed mezzanine	
Gross	1,425

Net (sales)	1,205
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2.27 Thus, the total gross floor area within the combined Units 2 and 3A will be 2,866 sq.m.

(i) Use

2.28 The proposal involves land associated with their use as a shop falling within Class A1.

Amount and scale

2.29 The proposal involve the addition of a further 1,425 sq.m. gross within the two units. No change to the scale (height, mass) of the two units which will be amalgamated, will result.

(iii) Layout and landscaping

2.30 Given the nature of the proposal no change to the layout of the retail park or additional landscaping is proposed.

(ii) Appearance

2.31 There will be no external changes to the building as a consequence of the additional mezzanine floor.

(iv) Access and car parking

2.32 There will be no change to the number of car parking spaces serving the retail park.

2.33 Nor will the rear service yard affect delivery vehicles to the site.

3.0 RELEVANT PLANNING POLICY

A. The development plan

- 3.1 The development plan comprises the Blaenau Gwent County Borough Local Development Plan up to 2021 which was adopted in November 2012.
- 3.2 The LDP recognises that the area has experienced significant change since the 1980's and suffers from high levels of unemployment and economic inactivity (paragraph 3.10). A key challenge is to secure jobs for the future including with the service sector and in addition to attract new investment. Thus the LDP seeks to create a network of sustainable vibrant valley communities and create opportunities for sustainable economic growth. Promoting the vitality and viability of town centres is also noted as being a further objective.
- 3.3 **Policy SP1 Northern Strategy Area – Sustainable Growth and Regeneration** confirms that Ebbw Vale is the principal hub at the centre of the network hierarchy, where the majority of social and economic growth will be accommodated³. Brynmawr is designated as a District Town Centre and the focus will be exploring opportunities to develop complementary roles around tourism. Blaina Local Town Centre will build on and exploit its local heritage.
- 3.4 **Policy SP3 The retail hierarchy and vitality and viability of the town centres,** confirms the retail hierarchy with Ebbw Vale as the Principal Town Centre and Brynmawr as a District Town Centre. Blaina is identified as a Local Town Centre with a local shopping role. It identifies a need for 10,200 sq.m. of comparison goods retail floorspace and 2,445 sq.m. of convenience goods floorspace⁴.
- 3.5 In terms of development management, **Policy DM1 New development,** sets out a series of criteria against which new development will be assessed. It requires that development should be compatible with other uses in the locality and ensures that it is accessible by a range of means of transport, is safe and provides appropriate levels of car parking and servicing.

³ The centre is expected to perform a sub-regional role.

⁴ This has been updated in the Blaenau Gwent Retail and Leisure Study (August 2021).

2. Planning Policy Wales (February 2021)

- 3.6 Section 4 of PPW deals with retail and commercial development. Paragraph 4.3.15 advises that in establishing whether a need exists outside existing centres, this may be quantitative and/or qualitative in nature. Quantitative need addresses unmet demand for the provision concerned. Qualitative considerations include both positive and negative considerations including amongst other matters, the degree to which it supports the objectives of the retail strategy, the accessibility of the site, whether it contributes to a reduction in car journeys and if it adds to the attractiveness and vibrancy of a centre (paragraph 4.3.16).
- 3.7 Paragraph 4.3.18 advises that the Welsh government adopts a 'town centre first' policy approach. An assessment should be made as to whether a site or building within an existing centre is suitable and available followed by edge of centre sites and then out of centre locations.
- 3.8 In terms of retail impact, paragraph 4.3.25 advises that retail development outside designated retail and commercial centres can impact on the viability and vibrancy of a centre. Impacts resulting from such development may include changes in turnover and trading ability, consumer choice and travel patterns. As well as impact on regeneration strategies. Paragraph 4.3.26 states that all schemes involving retail development of or in excess of 2,500 sq.m. gross should be supported by a retail impact assessment on the edge of or outside designated retail and commercial centres. The application proposes floorspace well below this threshold. However, discussions with Council officers have confirmed that a retail impact assessment should be provided (in accordance with paragraph 4.3.27 of the PPW) in order to assess in particular the potential impact on Brynmawr Town Centre.
- 3.9 Retail development is classified in the PPW as a form of economic development (paragraphs 5.4.1 and 5.4.2), which can deliver sustainable long term prosperity, jobs and incomes.

3. Technical Advice Note 4: Retail and Commercial Development (November 2016)

- 3.10 TAN4 supports the interpretation and application of national policy within PPW. It confirms that urban and rural centres should be the focus for new retail development and are the most sustainable locations to shop and work.
- 3.11 In terms of need, TAN4 confirms that the starting point for quantitative need is based on forecasting expenditure on comparison and convenience goods over a period of time. This is then assessed against current levels of provision (paragraph 6.1). Such assessments can

feed into the retail strategy for the development plan where local planning authorities should make decisions on the future type, location, and scale of new retail development (paragraph 6.4).

3.12 The TAN recognises that aspects of qualitative need are harder to justify (paragraph 6.6). It reiterates and expands upon the main components set out within PPW.

3.13 With regard to retail impact, TAN4 at paragraph 8.2 confirms that these are required where retail development of 2,500 sq.m. gross or more is proposed in edge or out of centre locations. It confirms that smaller retail proposals may also be subject to impact assessment “where the local planning authority believe it would have a significant impact on a retail and commercial centre.” (our emphasis).

3.14 A range of impact criteria are identified in paragraph 8.3:

- Impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area.
- Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.
- Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.
- The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
- Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.
- Assessment of the proportion of customers using the development traveling by different modes of transport.
- Impact on travel patterns over the catchment area.
- Any significant environmental impacts

4.0 BLAENAU GWENT RETAIL AND LEISURE STUDY (2021)

4.1 The BGRLS provides the most up to date information on the health of existing centres, shopping patterns and qualitative and quantitative need.

Health checks

(i) Ebbw Vale Town Centre

4.2 The study confirms that Ebbw Vale is the largest town centre in Blaenau Gwent both in terms of total floorspace and retail provision. It confirms that the pattern of streets mainly provide small retail units although larger more modern units are provided in the vicinity of The Walk which include several national comparison goods retailers in addition to Iceland and Aldi.

4.3 It confirms that the good convenience and comparison goods offer and below average vacancies suggests that Ebbw Vale is generally a healthy town centre.

(ii) Brynmawr

4.4 The study notes that the town centre is complemented by the Lakeside Retail Park which is located approximately 300 metres to the south west of the town centre based on a straight line distance. The large retail units are a draw to the town but it notes that the linkage to the town centre is not particularly inviting and the redevelopment of the NMC factory site had yet to be implemented⁵.



⁵ This is now virtually complete and has further enhanced pedestrian access between the retail park and the town centre.

- 4.5 Overall Brynmawr is judged to be a generally healthy centre despite the lack of national multiples and is performing relatively well. Long term success depends on increasing the interaction between the town centre and the Lakeside Retail Park and this would particularly benefit the area around Market Square.

(iii) Blaina

- 4.6 This is defined as a local centre which is performing poorly due to a larger number of vacant units with several properties in poor condition. The study concludes that it is little different from neighbourhood centres and the town centre boundary should be removed.

Retail Offer and shopping patterns

- 4.7 The study confirms that the main out of centre retail provision within the County Borough is provided by Lakeside Retail Park. Other outlets include Tesco and Morrisons at Ebbw Vale and the B&M Homestore at Rhyd y Blew Retail Park also in Ebbw Vale.
- 4.8 Based on 637 telephone household interviews across 6 zones, the study noted that the impact of Covid-19 had increased the level of internet purchases. Brynmawr was the second most frequently visited location in Blaenau Gwent with half of all respondents visiting either the town centre or Lakeside Retail Park on at least a monthly basis and nearly three quarters visiting at least occasionally. Zone 3 within which the town is located, attracted 80% of respondents at least one a week with 90% at least once a month. Inflows from other zones were also significant with 62% of Zone 5 (Abertillery) visiting at least once a month along with 50% within Zone 2 (Ebbw Vale North). The most popular reason for visiting is the Lakeside Retail Park.

Retail capacity and quantitative and qualitative need

- 4.9 The study does not predict a quantitative need for further comparison goods retail space based on a constant market share of 46%. Nor the study concludes is there any indication that existing centres are overtrading. It recognises that a significant proportion of comparison goods retail expenditure is via the internet. At the time the study was undertaken Home Bargains and Peacocks were still trading from Lakeside Retail Park.
- 4.10 In terms of qualitative need, the study concludes that there is no requirement to allocate new sites for retail development since none of the towns are considered to be locally deficient in retail provision.

5.0 QUANTITATIVE AND QUALITATIVE NEED

1. Quantitative need

5.1 We have referred in Section 4 to the conclusions of the BGRLS which suggests that there is no quantitative need for additional comparison goods retail space in the County Borough. At the time this study was undertaken Home Bargains was trading from Unit 2 and Peacocks from Unit 3A. We set out in **Table 5.1** an estimate of their likely turnover.

Table 5.1: Estimated turnover of Home Bargains and Peacocks in 2020 based on company average sales densities (2018 prices)

Occupier	Assumed sales density (£ sq.m.)	Sales area (sq.m.)	Comparison goods turnover (£ms)
Home Bargains			
- Comparison goods	£4,345	550 ⁶	£2.39
- Convenience goods	£4,345	271	£1.18
Peacocks	£1,109	410	£0.45
Total			
All goods	-	-	£4.02
- Comparison goods	-	-	£2.84

5.2 In **Table 5.2** we set out the estimated turnover within The Range. Typically mezzanine floors trade at below average company levels (typically around 50%) due to the nature of the floorspace provided. However we have applied the company average turnover to the total net sales area on the ground and mezzanine floors.

⁶ Based on 85% net trading area of 790 sq.m. which 30% devoted to the sale of convenience goods (271 sq.m.).

Table 5.2: Estimated base and design year turnover of proposed development

Occupier	Estimated sales density (£ sq.m.) 2020	Estimated sales density (£.sq.m.) 2025 ⁷	Total sales area ⁸	Comparison goods turnover (£ms) 2020	Comparison goods turnover (£ms) 2025
The Range	1,777	1,962	2,503	4.44	£4.91
- Mezzanine	1,777	1,962	1,205	-	£2.36

5.3 On this basis the occupation of the two units by The Range will not materially alter the comparison goods turnover generated by the two previous occupiers, giving rise to an increase of £1.46m of comparison goods but generating overall a very similar total all goods turnovers. In addition since the existing permission enables the sale of any non-food goods without restriction, there is scope for it to be occupied by a retailer with a substantially greater sales density. Experian’s Retail Planner Briefing Note 19 (January 2022) advises that the average sales density for all comparison goods retailers in 2020 was £6,152 sq.m. (2018 prices). Thus Units 2 and 3A based on this average could generate a turnover of around £7.6m (without any additional mezzanine space).

2. Qualitative need

5.4 Our conclusions in respect of qualitative need are summarised in **Table 5.3**, in the context of the proposed development.

Table 5.3: PPW - Qualitative need considerations

Criterion	Comment
1. Supports the objectives of the retail strategy or an adopted development plan	Lakeside Retail Park is the principal retail warehouse park in the County Borough and is recognised as providing an important shopping destination. The BGRLS confirms that it has a close relationship to the town centre and provides large modern retail units which meet the needs of national retailers. It is an important destination for both comparison and convenience goods shopping

⁷ With improved floorspace efficiency at 2% per annum.

⁸ Ground floor = 1,298 sq.m. ; Mezzanine floor = 1,205 sq.m.

	<p>and is important to ensuring that residents can shop locally.</p> <p>It would make beneficial use of consented and operational retail space in a location where the principle of edge-of centre retailing has been well established and is supported as part of the retail strategy for the County Borough.</p>
2. Is highly accessible	<p>The site is accessible by a range of means of transport including by bus, walk, cycle and car. The highly accessible nature of the site has been confirmed by the Council in respect of App. No. C/2021/0345 which related to the change of use of Units 2 and 4A to enable the sale of convenience goods. A copy of the report is attached as Appendix [4].</p>
3. Contributes to a substantial reduction in car journeys	<p>By extending the non-food retail offer associated with the introduction of The Range, shoppers will have a greater opportunity to meet their shopping needs within the County Borough and reduce the need to travel further afield. The retail study confirms for example that the Cyfarthfa Retail Park in Merthyr Tydfil is the principal destination for DIY/garden and pet relates goods. The proposal would enable a greater proportion of expenditure on these and other products to be retained locally. In addition shoppers seeking a Range store have to travel significant distances to Newport, Cardiff, Swansea, Gloucester or Hereford. The proposal will redress this deficiency.</p>
4. Contributes to the co-location of facilities	<p>It will complement other stores already trading on the retail park and would enable all units to be beneficially occupied.</p>
5. Significantly contributes to the vibrancy, attractiveness, and viability of a centre	<p>The proposal will contribute to the attractiveness and viability of Lakeside Retail Park which is noted to be an important shopping destination with reasonable links to and from Brynmawr Town Centre. This has been enhanced by the redevelopment of the NMC site immediately to the north.</p>
6. Assists in reducing over-trading	<p>There is no indication that the retail park or the town centres are overtrading.</p>
7. Address locally defined deficiencies	<p>The proposal is aimed at meeting the operational needs of The Range which has concluded that to trade effectively and offer its full products lines that a full floor mezzanine is required. It would also enable the company to open its first store in this part of south Wales.</p>
8. Alleviates a lack of convenience goods provision	<p>This criterion is not relevant to the proposal.</p>

3.8 In respect of other qualitative considerations, these are summarised in Table 5.4.

Table 5.4: Additional qualitative need considerations

Criterion	Comment
1. Standard of existing retail facilities	The proposal will improve the standard of shopping facilities in the County Borough and enable the full potential of the retail park to be fulfilled.
2. Range and mix of goods	The range and mix of goods would be enhanced by the provision of the mezzanine floor because this would provide the necessary retail space to maximise the company's product range which could be displayed. The proposed mezzanine is therefore locationally specific to the site and the existing operator.
3. Distribution of retail provision	The distribution of provision accords with Policy SP3 which confirms that the shopping needs of Brynmawr will be linked to new retail provision at Lakeside Retail Park. Thus the importance of the retail park in meeting the shopping needs of local residents is encapsulated within the development plan.
4. Impact on travel patterns	The scheme would enable a greater proportion of comparison goods shopping trips to be retained reducing travel to centres further afield such as Merthyr Tydfil.
5. Vibrant valley communities	Policy SB1 specifically supports spatial growth which promotes the full and effective use of urban land within settlement boundaries.

6.0 SATISFYING THE SEQUENTIAL APPROACH

1. Introduction and the adopted approach

6.1 Lakeside Retail Park is located on the edge of Brynmawr Town Centre. Consequently in accordance with paragraph 4.3.18 of PPW it is necessary to undertake an assessment of whether there are suitable and available sites within existing centres within the primary catchment area of the proposed development. As confirmed in the retail study the retail park draws the majority of its turnover from Zones 2 (Ebbw Vale North), 3 (Brynmawr) and 4 (Blaina) and these have been used as the PCA. The three main centres within these zones have therefore been subject to further assessment.

6.2 In summary, applying the sequential test means:

1. First assessing whether there are any available sites that are suitable in sequentially preferable locations
2. Acknowledging the market and locational requirements of the uses concerned
3. Ensuring the assessment is proportionate and appropriate to the given proposal
4. Being flexible to demonstrate whether more central sites have been fully considered

6.3 In interpreting the need for flexibility⁹ the Supreme Court in *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13¹⁰ held that in defining the term 'suitable' reference should be made to the design of the developer's proposal subject to the demonstration of flexibility and realism. It was held that the issue of suitability must be directed at the developer's proposals and not to some alternative scheme which might be suggested by the Local Planning Authority. In other words, any assessment must reflect the fact that a retail operator operates in the real world.

6.4 The principles underpinning the suitability of an alternative site was also discussed in the case of *R (on the application of Zurich Assurance Ltd T/A Threadneedle Property Investment v North Lincolnshire Council* [2012]¹¹. At paragraph 62 of the judgement¹² the Court¹³ held:

"Working in the real world, the committee were entitled (and indeed, bound) to take into account the evidence that any arrangement in which Marks and Spencer used the TJ Hughes unit (the only available unit in Scunthorpe town

⁹ The judgment remains relevant since it deals with the concept of flexibility which is retained within NPPF 2021.

¹⁰ Although applying to a case in Scotland, Inspectors in England and Wales often refer to this judgment in assessing the suitability of alternative sites for retail development.

¹¹ EWHC 3708 (Admin).

¹² 20th December 2012.

¹³ Justice Higginbottom.

centre) would not be commercially viable, and that, because of that lack of viability, Marks and Spencer would not locate to Scunthorpe town centre in the event that this Application for the site was refused.”

- 6.5 These judgments established two principles when interpreting and applying planning policy.
1. Decision makers cannot interpret planning policy in any way they choose subject only to the limits of rationality. Interpretation of planning policy is a matter of law and policy statements should be interpreted objectively in accordance with the language used, read always in its proper context (Lord Reed, paragraph 18 in *Tesco Stores Ltd*).
 2. In assessing whether a town centre site was 'suitable' this refers to the suitability of sites for the development specifically proposed (paragraph 25 of *Tesco Stores Ltd*).
- 6.6 There is no requirement with the development plan or PPW for the mezzanine to be disaggregated from the proposed Range store. Rather the sequential, test is applied with the following principles in mind:
1. It relates entirely what is proposed taking into account operator and commercial realities
 2. The *Dundee* case is legally binding.
 3. The question is whether an alternative site is suitable for the proposed development, not whether a proposal could be altered or reduced to be made to fit the alternative site.
 4. The proposal as a whole needs to be considered and should not be disaggregated.
 5. The sequential test is only concerned with sites that are available within a reasonable period of time.

2. Site location

- 6.7 As confirmed in the LDP Lakeside Retail Park is located within the settlement boundary of Brynmawr (Policy SB1 of the LDP) in an edge of centre location. This was confirmed in relation to a previous application (No. C/2021/0345), the planning officer's report is attached as **Appendix [4]**. Thus only sites which are within existing centres within the primary catchment area of the proposed development should be subject to sequential assessment.
- 6.8 The sequential assessment has also been completed in the context of The Range's business model. The Range has a minimum floorspace requirement in this location of 2,800 sq.m. gross with on-site car parking. The larger stores typically have up to 65,000 product lines across 16 departments including DIY, homewares, furniture, lighting, arts and crafts, garden products including a garden centre.
- 6.10 We have undertaken a sequential assessment and have adopted the following minimum thresholds for assessing the suitability or alternative premises/sites applying flexibility in format and scale (Table 6.1).

Table 6.1: Sequential site parameters

Unit	Minimum floor area sq.m. gross	Minimum site requirement
The Range	2,800	1.1ha

6.11 Since the Range typically seek to re-use existing space as is this case, and since the company does not normally develop its own stores¹⁴, the company would not consider constructing a new unit in or on the edge of the town centre the following points are therefore relevant in applying the sequential test:

- CDS (Superstores International) Ltd are not developers and do not typically build their own stores.
- Their primary focus is on re-occupying and re-profiling existing second-hand retail space which has become or is becoming redundant to the former or existing occupiers.
- The company requires the ability to sell both bulky and non-bulky non-food goods from a minimum of 2,800 square metres.
- A demised at grade customer car park of an appropriate size is required directly adjacent to the retail unit to allow the safe and direct transfer of goods from store to customer vehicle, in particular for the purchase of bulky goods.
- The company requires the provision of an outside area to store trolleys.
- The company favour locations with good accessibility to the strategic highway network and/or in close proximity to other retail warehouse operators providing customers with an ability to compare goods and prices.

6.12 In terms of the primary catchment area this has been defined as primarily being comprised of Zone 2 (Ebbw Vale North), Zone 3 (Brynmawr) and Zone 4 (Blaina). While some trade will be drawn from outside of these three zones, the majority of the proposed turnover will be generated by residents in these locations.

6.13 On this basis we have assessed the following centres:

- Ebbw Vale: Principal Town Centre
- Brynmawr: District Town Centre

¹⁴ The exception is in Plymouth where the company is constructing a new Range store. However, this is in conjunction with the development of a new national headquarters at Derriford.

- Blaina: Local Town Centre

6.14 We have firstly assessed town centre shop units and other vacant units within the centres. We have then examined sites allocated for retail development within the LDP.

1. Available premises within the existing centres

	Suitability considerations
1.	Individually the units within the existing centres are generally too small to meet the requirements of The Range which sells in the order of 65,000 items. Operating from two or more stores would reduce rather than increase the efficiency of the company. This has a bearing not only on the inherent attractiveness and sustainability of allowing the display of a larger number of items under a single roof, but it also reduces the costs and overheads which we address under viability.
2.	The company has been increasing the number of products (but not the range of comparison goods) within each goods category. This means that the display areas have been increasing. The company has estimated based on an analysis of the town centre and the proposed catchment that a minimum of 2,800 sq.m. gross is required. If this were split between two buildings more rather than less space would be required because of the inherent inefficiencies of trading from a range of units and the duplication and triplication of non-sales space which would arise. This will apply particularly to retailers selling bulky durable goods such as DIY, furniture, carpets, and domestic appliances. All of these goods are sold by The Range. Separating the mezzanine as part of a second store which would also require disaggregating the permitted range of goods, would lead to a reduced retail offer.
3.	The Range seeks to maximise the areas available for product display and to ensure that customers are able to move freely around the store. The core concept is based on 'cross-selling and dual-sighting' of products. If the products were split between more than one location, the benefits to both the retailer and the customer fail to materialise. The company did try and operate four separate units in Plymouth. However, trading levels were significantly reduced reflecting the fact that they were not attractive to the customer. Subsequently the company has closed two units. The productivity of the operation remains below company norms because of the generally unsuitable trading format and split sites. This would be contrary to the Government's desire to secure competition between retailers and enhanced consumer choice. None of the town centre units therefore offer a realistic proposition for The Range.
4.	There is no scope to extend any of the outlets or to insert mezzanines to achieve viable trading levels. The company were able in respect of an 1,858 sq.m. gross unit in Bristol, fortunate in being able to add a mezzanine floor after it ran into trading difficulties. In the case of the town centre units, there would be no scope to increase the sales area or create a multi-storey development.
5.	Trading from more than one unit would require separate leases with different property owners. The timing, terms and renewal of the leases are likely to be materially different and it is possible that some landlords would seek to extract considerably more favourable terms knowing that the company needed to trade from more than one unit.

6.	Delivery schedules and frequency would be increased reflecting the smaller size of the store. In addition, it might be necessary to seek to reduce the size of delivery vehicles given the difficulty in accessing some of the smaller units.
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Viability considerations	
1.	The markedly reduced trading area would provide limited ability for the company to display even one of its main product ranges. It would not be suitable for the sale of its bulky items because of the limited space, generally cramped and unattractive internal layout, and inability to trade from more than the ground level. In turn this would have a materially adverse impact on its overall trading levels and profitability. Each store within the company's portfolio is operated as a profit centre. The company does not trade on the basis that one store would subsidise another. Therefore, operating from two units or more in the town centre would require each store to achieve profitable levels within a specified period. Failure to achieve satisfactory trading levels would lead to closure as in the case of Plymouth.
2.	The Range does not trade at larger profit margins which reflects the nature of the goods sold and its pricing strategy. The profit margin is low compared with 'High Street' retailers such as Marks and Spencer, Next, River Island, and John Lewis. These retailers also generate significant higher sales densities (typically in excess of £5,000-£6,000 sq.m.) and are able therefore to sustain the much higher rents demanded by landlords in town centre locations. In contrast The Range generates sales densities comparable with many retail warehouse operators but not town centre uses. Disaggregating the mezzanine will reduce rather than increase the sales density (as confirmed by the company's trading performance in Bristol which is from a single store of below ideal size).
3.	Increased operational costs from operating at more than one site would be substantial. This would relate to a duplication of employment opportunities with each store requiring individual managers and assistant managers together with sales, office, IT, warehouse, and maintenance employees. IT and infrastructure costs would increase.
4.	It would reduce the identity and attractiveness of the brand again impacting upon the overall turnover and therefore profitability of the unit.
5.	Trading from more than one unit would require separate leases with different landlords. The timing, terms and renewal of the leases are likely to be materially different and it is possible that some property owners would seek to extract considerably more favourable terms knowing that the company needed to trade from more than one unit.
6.	The company's approach to retailing is to offer value for money items at low prices. As the company has confirmed this means that it is very sensitive to any increases on overheads. Renting town centre premises is appreciably higher than space in out of centre locations. When coupled with the narrower net margins, lower sales density relative to High Street retailers, price elasticity, and higher overheads, the units would not be commercially viable and would we believe ultimately lead to the outlets failing to achieve even the minimum net margins required for profitability. In this context it is of course necessary to recognise the importance of achieving the net margin because this is required to sustain the company's existing position and growth in the future.

6.15 Within Ebbw Vale town centre the former BrightHouse unit is vacant. However this extends to approximately 675 sq.m. gross and is therefore too small to meet the requirements of The Range.

BrightHouse unit, The Walk



- 6.16 Within Brynmawr Town Centre there are a range of smaller units but all of these are typically between 75-200 sq.m. gross and are too small to accommodate a Range store.

2. Town Centres sites

(a) Ebbw Vale Town Centre

- 6.17 **Policy AA1.1 Southern Gateway** promotes 500 sq.m. of convenience goods floorspace. The site lies within the defined town centre boundary and is intended to provide a link to 'The Work's under Policy MU2. However as the BGRLNS confirms there is no quantitative need for further convenience goods floorspace. The site is largely already fully occupied by The Walk and an Aldi supermarket and therefore it is not available nor suitable for the development of a 3,000 sq.m. gross retail warehouse store.

Part of Southern Gateway (Policy AA.1.1)



6.18 **Policy AA1.2: Market Square** supports mixed-use development at the northern end of the town centre to link into the Northern Corridor site. However, this area is largely fully occupied and contains a range of uses including a car workshop. Various highway improvements works are associated with the allocation. Although the policy supports 1,300 sq.m. of comparison goods retailing (which in any event would be too small to meet the requirements of The Range), the BGRLS advises that the site lies partly within and partly outside the defined town centre, and the town centre boundary should be adjusted to remove it from the designation. Thus in effect it would become an edge of centre site which is not sequentially preferable. The retail study also recommends that it is no longer allocated for comparison goods retailing.

Part of land associated with Market Square (Policy AA.12)



- 6.19 Notwithstanding the above the site is not considered to be likely to become available within a reasonable period of time and is any event not suitable being too small to accommodate the required size of store required by the Applicant.
- 6.20 **Policy R.14 Market Square** is a very small site within the town centre used as a car park. It is too small to accommodate a large format retail warehouse and is therefore not suitable. Its use as a car park also contributes to the vitality and viability of the town centre.

(b) Brynmawr Town Centre

- 6.21 There are no retail allocations within the town centre. Policy MU3 allocates the former NMC site but this is not available having been developed for a discount food store, a new Home Bargains store and Greggs.

(c) Blaina Local Centre

- 6.22 There are no sites allocated for retail development within the town centre and we have not identified any opportunities. The retail study suggests that in any event the town centre boundary should be removed given its status within the retail hierarchy.

Overall conclusions

- 6.23 The absence of any in centre sites which are suitable and available is consistent with the Council's conclusion in respect of App. No. C/2021/0345. That related a store of less than half the size now under consideration and it was concluded that Lakeside Retail Park

involved and edge of centre location. PPW at paragraph 4.3.23 specifically acknowledges that some stores particularly those selling bulky goods and requiring large showrooms may not find suitable sites and buildings within existing retail and commercial centres and they should be located in first instance in edge of centre locations.

6.24 We therefore conclude that the sequential test is passed.

7.0 ASSESSING RETAIL IMPACT

1. Introduction

- 7.1 Pre-application discussions with the Council confirmed that a retail impact assessment should be provided notwithstanding the fact that the proposed floorspace falls below the 2,500 sq.m. threshold set out in PPW. The original permission precluded the installation of mezzanine floors in order to protect the vitality and viability of Brynmawr town centre.
- 7.2 Accordingly a proportionate retail impact assessment has been undertaken reflecting the modest nature of the additional space proposed whilst recognising that the design year turnover of The Range in 2025 will not be materially different from that associated with the previous occupiers of the two units.

2. Base and design year assumptions

- 7.3 We have based our assessment on data contained within the BGRLS which provides the most up to date information on shopping patterns.
- 7.4 The following assumptions have been adopted:

Primary Catchment Area (PCA):	Study area zones 2 and 3 from which up to 70% of the trade will be drawn
Population and expenditure:	Based on BGRLS
Base year:	2020
Design year:	2025 ¹⁵
Price base:	At constant 2018 prices.
Net floorspace:	1,205 sq.m.
Estimated design year turnover of the mezzanine :	Comparison Goods - £2.36m ¹⁶
Centres assessed for impact:	Ebbw Vale and Brynmawr Town Centres

¹⁵ This assumes store opening in 2023 with a first settled trading year in 2025.

¹⁶ Based on company trading density of in 2019 and applied to internal net sales area of the additional mezzanine floorspace of 1,205 sq.m. net. No discount has been applied to the trading density on the mezzanine although The Range confirm that typically they trade at around 50-60% of the ground floor retail space.

3. Comparison goods expenditure flows 2025-2025

7.5 We set out in **Appendix [5]**, relevant tables relating to the retail impact assessment. The following tables are provided:

Table reference	Table description
Table 1	Population by study zone
Table 2	Comparison goods expenditure per head 2018-2033 (2018 prices)
Table 3	Total available comparison expenditure 2018-2033 excluding SFT ¹⁷ (2018 prices)
Table 4	Comparison Turnover of centres/stores 2018
Table 5	Comparison Turnover of centre/stores 2020
Table 6	Comparison Turnover of centre/stores 2025
Table 7	Comparison Turnover of centre/stores 2030
Table 8	Trade draw by zone to The Range
Table 9	Trade diversion by NMC development in 2025 ¹⁸
Table 10	Cumulative impact in 2025

7.6 All of these tables apart from **Tables [8], [9] and [10]** have been sourced from the retail study.

4. Trade draw and impact

7.7 **Table [8]** sets out the estimated trade draw to the proposed development having regard to the trading characteristics of The Range and the retail park. The retail study confirms that the main destinations for the types of goods sold by The Range are as follows:

Table 7.1: Most popular destinations for comparison goods shopping: All zones

Type of goods All zones	Most popular	2 nd choice	3 rd choice
Recreational goods	Internet/delivered	Ebbw Vale Town Centre	Lakeside Retail Park
Furniture/carpet/floor coverings	Internet/delivered	Ebbw Vale Town Centre	Cyfarthfa Retail Park, Merthyr Tydfil
Items for the house	Internet/delivered	Cyfarthfa Retail Park	Lakeside Retail Park

¹⁷ Special Forms of Trading.

¹⁸ This is based on the turnover and trade draw estimates provided by JLL in its Retail Statement Addendum (March 2017).

DIY/garden/pet related	Cyfarthfa Retail Park	Ebbw Vale Town Centre	B&M Home store, Rhyd-y-Blew, Ebbw Vale
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7.8 The trade draw is based on the sales predicted to be achieved in the mezzanine in 2025. As a worst case we have not discounted the design year turnover to reflect the comparison goods turnover achieved by the previous occupiers of the two units. The trade draw reflects the predicted comparison goods shopping patterns in 2025, which

7.9 **Table [9]** includes as a first step the predicted comparison goods impact associated with the NMC development based on the agreed trade diversion associated Unit 3 in that scheme¹⁹. **Table [10]** then includes the cumulative impact associated with the proposed mezzanine floor within Units 2 and 3A. In summary the impact on existing centres is set out in Table 7.2.

Table 7.2: Retail impact summary

Centre/store	Comparison goods turnover 2025 (£ms)	Comparison goods trade diversion to NMC 2025 (£ms)	Solus impact (%) 2025	Comparison goods trade diversion to The Range 2025 (£ms)	Cumulative impact (%) 2025
1. Ebbw Vale TC	24.64	£0.39	1.6%	£0.20	2.4%
2. Brynmawr TC	4.44	£0.12	2.7%	£0.07	4.3%
Out of centre					
Festival Park FOC	15.98	-	-	£0.14	0.9%
Lakeside Retail Park ²⁰	10.81	£0.59	16.1%	£0.14	1.7%
Asda, Lakeside Retail Park	-	-	-	£0.12	1.7%
B&M Home Store, Ebbw Vale	-	-	-	£0.28	7.9%

¹⁹ Involving a store extending to 1,631 sq.m. with a design year comparison goods turnover of £3.94m (adjusted from the 2014 price based turnover of £3.28m). The unit is to be occupied by Home Bargains and will be likely to generate a comparison goods turnover greater than that estimated in the Retail Statement Addendum (March 2017) prepared by JLL> However we have not adjusted the turnover to reflect the transfer of trade from the former Home Bargains store at Lakeside Retail Park and therefore a net additional comparison goods turnover within Unit 3 assesses a worst case.

²⁰ Including comparison goods turnover within Asda.

Cyfarthfa Retail Park	32.87 ²¹	£0.04	0.1%	£0.47	1.6%
Elsewhere	-	£2.8	-	£0.94	-

7.10 The trade diversion has been assessed based on the impact on public and private sector investment and the vitality and viability of existing centres.

Impact on town centre investment

7.11 In assessing the impact on existing centres it is material to note that the two units were trading at the time of the retail study and were in themselves attracting a level of comparison goods expenditure. As we have noted in Section 5, the total turnover of the two units when occupied by Home Bargains and Peacocks is not materially different to the total turnover associated by their occupation by The Range. On this basis the introduction of The Range will not materially alter the comparison goods turnover of the existing centres.

7.12 In relation to Ebbw Vale Town Centre, this is the principal shopping centres in the County Borough and the retail study confirms that it is in reasonably good health. There are no existing or committed plans for further private or public investment and while the LDP supports further development at Southern Gateway (Policy AA1.1) Market Square (Policies AA1.2 and R1.4) none of the sites is subject to planning applications or permission for redevelopment. Indeed the retail study recommends that sites AA1.1 and AA1.2 are no longer required to be allocated for town centre and other uses. The level of trade diversion will have no material impact on the role and function of this centre. Based on the cumulative impact 2025 the town centre will trade in excess of £3m higher than in 2020 and in 2030 it will trade £5.8m higher allowing scope for existing retailers to improve their sales and enable new retailers to start to occupy some of the smaller units.

7.13 With regard to Brynmawr Town Centre, the NMC redevelopment is almost complete and there is no known private or public sector developments within the town centre itself. The proposal will enhance the commercial attractiveness of the retail park and thereby encourage a greater proportion of shoppers to visit the town as a whole.

7.14 The scheme will not have a material impact on Blaina Local Centre.

²¹ From study area only.

Impact on town centre vitality and viability

- 7.15 The majority of the trade will be drawn from similar stores and on the whole the impact on retailers within existing centres will be modest. The assessment confirms that all centres will trade above 2020 levels following the NMC redevelopment and the proposed mezzanine.
- 7.16 The retail study confirms that **Ebbw Vale Town Centre** is generally healthy with a good convenience and comparison goods offer. One of its strengths is the high proportion of national multiples and relatively low vacancy rate. The majority of the town's turnover is generated by convenience goods which will remain unaffected by the proposal. The retail study confirms nonetheless that it has a strong comparison offer with a good range of national multiples and independent retailers. This is complemented by a good range of financial and service uses to provide a complementary range of uses which all combine to underpin its vitality and viability. Financial and businesses uses are particularly important along with people visiting for food and drink purchases in bars, cafes and restaurants.
- 7.17 **Brynmawr Town Centre** is also agreed to be generally healthy despite the lack of national multiples. The retail study notes that the centre benefits from the proximity of Lakeside Retail Park and the challenge is to increase the connectivity between the two. This in part will be enhanced following the completion of the NMC development which will provide greater opportunities for linked shopping and other trips. The retail study confirms that almost 19% of visitors visiting once a week use it for financial and business services, with 9.5% for sports/health and fitness, 10% to visit bars/pubs and around 20% for visiting cafes/coffee shops and restaurants. Thus its vitality and viability is underpinned by a range of non-Class A1 uses. Cumulatively the proposed development increases the impact on the town centre from 2.7% to 4.3%. This is not considered to be materially adverse and does not make any allowance for an increased level of linked trips and expenditure generated by the increased attractiveness of the town following the completion of both development.
- 7.18 Overall it is not considered that the mezzanine will have a material impact on the health of local centres in terms of consumer choice and trade. Overall it will therefore accord with the LDP and PPW.

8.0 MATERIAL CONSIDERATIONS FAVOURING THE GRANT OF CONSENT

8.1 The scheme will deliver a number of benefits which are considered to be of relevance to a determination of the planning application.

1. The Proposed Development will Secure Sustainable Economic Growth

8.2 It will accord with PPW's objective of promoting sustainable economic growth and SB1 of the LDP which seeks to deliver a network of sustainable and vibrant valley communities.

8.3 The proposal would continue to make the most efficient use of the units on the edge of the town centre. This accords with Policy SB1.

8.4 The proposal would generate significant community benefits through creating a number of new jobs and generating earnings. A report by the UK Commission for Employment and Skills: Retail (2012) confirms the importance of the retail sector to the UK economy.

- Retail is a major part of the UK economy, accounting for around 10 per cent of all employment and approximately five per cent of GDP. The sector is also important due to its direct supply of goods and services to consumers.
- The sector provides employment opportunities, through the provision of part-time employment and non-standard hours of work, to people who might otherwise struggle to find work which allows them to manage their commitments outside of work. It also provides employment to many young people.
- The recent recession has adversely affected employment in retail, though in relative terms, the decline in employment in retail (at around four per cent) has not been as great as in many other sectors (e.g., construction and manufacturing).
- In the post-recession period, harsh trading conditions have persisted as have lower levels of consumer confidence. As a result, a number of changes are taking place in the retail sector including growth in the discount/value sector and the increasing importance of multi-channel operations. The Range provides one such service offering discount, value sector goods.

8.5 In terms of the number of colleagues employed, the company estimates the following will be required:

- Colleagues (Permanent) – 65
- Full Time (30 hours plus) – 20
- Part Time (less than 30 Hours) – 45

- 8.6 These figures would be inflated at seasonal times such as Christmas, Halloween/Bonfire night and during summer months. This would equate to a further 10 FTE.
- 8.7 The main benefits for colleagues are set out below:
- Up to 30 days paid holidays per annum (pro rata for part time and inclusive of Bank Holidays)
 - Free uniforms (where applicable)
 - Colleague discount (includes family members living in the same household)
 - Pension scheme
 - Training and development programmes
- 8.8 In terms of remuneration, general associates are paid around £9 per hour. However, management and supervisory roles would be recruited on a salary basis and these range from £18,000-£40,000 per annum. A store of the size proposed will have approximately 15 supervisory roles for the different product departments and different functions (e.g., cash office).
- 8.9 Table 8.1 below demonstrates that the increase in employment positions at the site would lead to an increase the earnings in the local economy by approximately £1.3m per annum.

Table 8.1: Economic Growth as a consequence of the proposal

	<i>No. of FTE Jobs</i>	<i>Average Weekly Pay</i>	<i>Weeks in a Year</i>	<i>Earnings (£m/annum)</i>
Proposal	45	£569	52	£1.33

Note:

Average weekly pay from mean average weekly pay for the retail trade, except of motor vehicles and motorcycles as taken from the ONS Annual Survey of Hours and Earnings, 2018

Value to the Local Economy = No. of Jobs x Average Weekly Pay x 52

- 8.10 The number of jobs created by occupation of the units is a material benefit, given the current state of the UK economy. As noted above a range of jobs will be provided from management and supervisor staff level to clerical, administrative and service positions. Retail jobs are socially inclusive by providing the range of jobs in both full and part-time positions. Reducing barriers of entry to employment positions is a key part of the enabling social progress, which is encompassed within the economic and social roles that the planning system performs. The Range have a company policy of securing local people to work in their stores.

8.11 The increase in earnings is a significant positive benefit. The increase in earnings will generate associated wider benefits for the local economy through increased spending power of residents, which in turn will help support other businesses in the locality. There is an urgent need to create job opportunities now particularly given the scale of shop closures nationally, both within town centre and in out of centre locations. Private investment is needed to secure employment growth as the size of the budget deficit means that the Government has decided that it cannot increase its borrowings to secure growth through a public sector led stimulus. The impact of Covid-19 has also heightened the need for economic development to boost tax receipts and create local employment opportunities. In short, the government is relying more than ever on private sector investment to stimulate the economy. The government wants the private sector to invest now. Accordingly, the requirement for economic investment is a national imperative.

2. The Application Site is in an Accessible Location

8.12 The site is accessible by a variety of modes of transport within convenient walking distance of the town centre and forms a well-established retail destination.

3. Reducing social exclusion

8.13 The general area has a customer base which comprises less affluent households which are attracted to products that are offered at discount prices. However, The Range also appeals to more affluent households. This proposal is at a scale and format which will complement provision within the area as part of established out of centre shopping destination whilst increasing choice and social inclusion in a sustainable manner.

4. Improving the choice of shopping

6.14 The scheme would ensure that The Range is able to secure representation in the area and improve the range of retail outlets in a sustainable location on the edge of the town centre, complementing existing shops on the retail park and increasing the opportunities for linked shopping and other trips to and from the town centre. It would also assist in retaining a greater proportion of local expenditure supporting jobs and reducing the number and length of shopping trips particularly to Merthyr Tydfil.

5. Meeting government objectives

8.15 It is considered that the proposal complies with the following relevant principles in PPW:

- Proactively driving and supporting sustainable economic development

- Seeking to secure high quality design and good standard of amenity for all existing and future occupants of land buildings
- Promoting the vitality of our main urban areas and valley communities
- Supporting the transition to a low carbon future
- Contributing to reducing pollution
- Reusing land that is previously developed
- Actively managing patterns of growth to make the fullest possible use of public transport, walking, and cycling and focus development in locations which are or can be made sustainable.

9.0 OVERALL CONCLUSIONS

9.1 In summary therefore:

- The application relates to **consented** retail floorspace, which has planning permission for retail use including the construction of a new garden centre.
- No change in the primary nature of the permitted retail use would occur.
- It would improve the range and quality of shopping within the County Borough and the Range has a confirmed need to gain representation within the area.
- The application is supported by evidence addressing the sequential and impact tests. The Council in granting permission for the sale of food and convenience goods from the units agreed that there were no sequentially suitable and available sites within existing town centres.
- The application site is previously developed.
- It involves private sector investment in Brynmawr at no cost to public funds. The total investment by The Range and landlord will be in excess of £1.0m.
- It will deliver 65 full and part time employment opportunities.
- There is no indication that the scheme would give rise to a significant adverse impact on any existing centres.