Blaenau Gwent Retail and Leisure Study

August 2021

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Executive Summary

1) This study has been prepared jointly by Reeves Retail Planning Consultancy (RRPC) and Williams Gallagher (WG) on the instructions of Blaenau Gwent County Borough Council (BGCBC).

2) Its purpose is to provide an updated evidence base on retail and town centre uses (including leisure) to inform the Replacement Local Development Plan (RLDP) which the Council is in the process of preparing.

3) The study is based on new primary data, namely:

- A household survey undertaken by NEMS Market Research in June / July 2020. A total of 637 interviews were undertaken across 6 zones that reflect the settlement distribution within the County Borough area. The survey collected information on current shopping behaviour for food and non-food purchases, as well as information on how the town, district and local centres are used and respondents' views of the offer currently provided in the Blaenau Gwent town centres. Given the timing of the survey it also included questions on how shopping behaviour had been affected by the Covid-19 pandemic and specifically the first lockdown; and
- Health checks for Ebbw Vale, Abertillery, Brynmawr, Tredegar and Blaina, utilising the Council's annual town centre surveys and the household survey, as well as other data sources and evidence from site visits.

4) National trends relating to retailing and the changes being experienced in town centres, the food and beverage sector and other town centre uses have also been considered, along with the quantitative and qualitative capacity for additional convenience and comparison floorspace in Blaenau Gwent.

5) The study also considers the current provision of leisure uses within the defined centres and provides commentary on future capacity and demand.

6) The key outputs of the study comprise:

- A quantitative and qualitative assessment of the need for additional convenience and comparison provision during the plan period to 2033;
- An assessment of the current health of the main Blaenau Gwent town centres and their strengths, weaknesses, opportunities and threats (SWOT analysis);
- A review of the commercial leisure provision within the town centres, including existing provision, patterns of usage and future needs;
- Recommendations on the retail hierarchy in the area;
- A review of the town centre boundaries and Primary Retail Areas as currently defined; and
- Recommendations on how the current retail and town centre policies of the Local Development Plan could be updated to ensure they provide sufficient guidance and flexibility to meet the requirements set out in national planning policy.

Retail Capacity

7) This study has been undertaken at a time when many town centres and traditional high streets nationally are struggling to evolve quickly enough to adapt to the significant and fast-moving structural changes that have been seen in the retail sector since the economic recession. These include changes in shopping habits, the demise of many traditional retailers, ongoing competition from out of centre retailers and the growing use of online shopping for an increasing range of retail goods and some services.

8) More recently all retail and other town centre businesses have faced the challenges of the Covid-19 pandemic. The full impact of the latter is currently unknown, but experience to date suggests that the significant decline in the demand for retail floorspace in all centres will continue, resulting in increasing vacancies and limited demand from new occupiers.

9) It is also possible that the increased importance of 'local' shopping seen during the pandemic lockdowns may benefit the Blaenau Gwent centres, with shopping previously being undertaken in the larger centres being replaced by a combination of online and local shopping. However, centres still need to adapt if they are to survive and thrive. There will need to be a decreasing reliance on retail uses in the future and retail floorspace needs to be replaced by a greater mix of uses and draws.

10) This decreasing demand for retail provision is reflected in the findings of the quantitative retail capacity assessment for Blaenau Gwent which indicates no quantitative capacity for new retail floorspace during the Plan period to 2033.

11) This is based on the assumption that current town centres and out of centre provision maintain their current market shares (as evidenced by the 2020 household survey) . Further, both convenience and comparison capacity are found to be negative whether assessed using the most recent Experian population forecasts or the Aspirational Figures set out in the Deposit Plan.

12) This, purely quantitative assessment, suggests that there is already more than sufficient retail comparison floorspace within the County Borough to meet identified needs during the plan period. For convenience floorspace this reflects the combined effect of limited changes in overall convenience expenditure, declining spend in physical shops and the considerable capacity for existing stores to improve their performance (sales efficiencies) in the future.

13) For comparison goods, growth in comparison expenditure will be greater during the plan period, despite the greater proportion of spend being made online. However, the potential and need for existing retailers to improve their performance is greater, if such businesses are to remain profitable as business costs increase.

Table A8.28: Convenience Capacity - Blaenau Gwent (Base excluding Commitments)

		2018	2020	2025	2030	2033
Total Available Convenience Expenditure in Study Area (£m)	(a)	£136.68	£143.00	£134.01	£131.57	£130.32
Current Market share of Convenience destinations in study area	(b)	89.9%	89.9%	89.9%	89.9%	89.9%
Available Convenience Expenditure for destinations in study area	(c)	£122.93	£128.62	£120.53	£118.34	£117.22
Change in available spend to study area destinations (cumulative from 2018)	*(d)*		*£5.68*	*-£2.40*	*-£4.59*	*-£5.72*
Turnover of Convenience destinations (assuming no change in provision or sales efficiences)	(e)	£122.94	£122.94	£122.94	£122.94	£122.94
Turnover of Convenience destinations (allowing for changes in sales efficiences)	(f)	£122.94	£126.99	£122.84	£124.69	£125.82
Residual Convenience spend to support new convenience floorspace (cumulative) (£m)	**(g)**		£1.63	-£2.31	-£6.35	-£8.60
Benchmark Sales density for Convenience Floorspace (£ per sqm)	(h)		£9,812	£9,482	£9,736	£9,736
Amount of new convenience floorspace required (cumulative) (sqm net)	**(j)**		**166**	**-243**	**-652**	**-883**

Table A8.29 : Comparison Capacity - Blaenau Gwent (Base excluding Commitments)

		2018	2020	2025	2030	2035
Total Available Comparison Expenditure in Study Area	(a)	£149.33	£131.90	£155.60	£172.21	£183.88
Current Market share of Comparison destinations in study area	(b)	46.0%	46.0%	46.0%	46.0%	46.0%
Available Comparison Expenditure for destinations in study area	(c)	£68.67	£60.66	£71.56	£79.20	£84.56
Change in available spend to study area destinations (cumulative)	*(d)*		*-£8.02*	*£2.88*	*£10.52*	*£15.89*
Turnover of Comparison destinations (assuming no change in provision or sales efficiences)	(e)	£68.68	£68.68	£68.68	£68.68	£68.68
Turnover of Comparison destinations (allowing for changes in sales efficiences)	(f)	£68.68	£61.41	£74.48	£85.42	£93.07
Residual Comparison spend to support new comparison floorspace (cumulative)	**(g)**		**-£0.75**	**-£2.92**	**-£6.23**	**-£8.51**
Benchmark Sales density for Comparison Floorspace (£ per sqm)	(h)		£4,450	£5,410	£6,971	£6,971
Amount of new comparison floorspace required (cumulative) (sqm net)	**(i)**		**-169**	**-540**	**-893**	**-1,221**

14) These findings are consistent with recent experience in the County Borough, which has seen few of the committed retail proposals or allocations brought forward during the current LDP period and the decline in retail, particularly comparison, provision in town centres.

15) It should also be noted that the above figures exclude any committed retail schemes (i.e. those with planning permission) or sites that are allocated in the Local Development Plan. In practice, the only scheme now expected to come forward is the development of the NMC Factory and Bus Depot site in Brynmawr. Other commitments are not expected to come forward and there is no capacity requirement to retain previous retail allocations in the Replacement LDP.

Leisure Uses and Other Town Centre Uses

16) Leisure uses have always been an important element of a town centre offer but their relative significance has increased in recent years, as spend on eating out and other leisure activities has increased, whilst spending at shops in town centres has declined at least in relative terms.

17) The existing leisure offer in Blaenau Gwent's town centres is mainly related to the Food and Drink sector (Use Class A3) and is an important element of the overall offer making up a considerable proportion of the existing occupiers and floorspace. However, provision in the Blaenau Gwent centres is generally below the UK average. Only Abertillery is (marginally) above, whilst provision in Ebbw Vale is particularly low.

18) The difference in offer is more pronounced when the type of food and drink provision is considered. Blaenau Gwent centres have very high levels of fast food & takeaway provision, in most cases more than double the UK average in terms of the number of units. There is also a higher provision of cafes but very low 'restaurant' provision.

19) The quantitative capacity for other town centre uses including leisure uses is more difficult to assess than for retail, given the wide variety of other uses that the term can be applied to and the lack of reliable data to indicate what may be an appropriate level of provision in a particular centre or area.

20) However, there are many uses that are or could be accommodated in the Blaenau Gwent town centres and where the available expenditure locally is significant. Examples include a possible £25.25m available for spending on restaurant and café meals, £11.47m for alcoholic drinks (consumed away from home) and a total of £19.72m for takeaway meals and snacks.

21) With leisure spend overall expected to increase by between 0.9% and 2.9% per annum from 2023 onwards, and by considerably more than that in 2021 and 2022 after the sharp decline in 2020, it is clear that the role of leisure and retail services within town centres will continue to be important during the plan period. Further, given that the majority of services and leisure activities require a physical presence at the business location, the uses can contribute to the vitality of a town centre.

22) There would also appear to be a qualitative need to improve the mix of A3 uses within the Blaenau Gwent centres to better reflect the expenditure available to spend on eating out in cafes / restaurants compared with fast food & takeaways. The former uses also support the vitality of town centres to a greater extent than fast food and takeaway uses as they are both more likely to be open at the same time as the retail uses ie during the daytime trading hours, and have greater potential to increase the dwell-time of visitors.

Town Centre Health Checks and Boundary Recommendations

23) The Retail Hierarchy in Blaenau Gwent currently defines Ebbw Vale as a Principal Town Centre with a sub-regional role and Abertillery, Brynmawr and Tredegar as District Town Centres. Blaina is defined as a Local Town Centre. Below Blaina are a number of neighbourhood centres.

24) This offer is complemented by the out of town retail provision in the County Borough, which for convenience provision comprises Tesco and Morrison's in Ebbw Vale; Asda at Lakeside Retail Park,

Brynmawr and Tesco in Abertillery. The main comparison provision is at Lakeside Retail Park in Brynmawr and the B&M Home store at Rhyd y Blew Retail Park, Ebbw Vale. Until mid-2020 there was also a major comparison offer at the Festival Shopping Outlet Centre in Ebbw Vale.

25) A review of the health of these centres has been undertaken, informed by the annual town centre occupancy surveys conducted by BGCBC, the 2020 household survey, site visits and national data. The findings have then been used to inform our recommendations on the updates required to current retail, leisure and town centre planning policies to ensure they reflect the current and future needs of the centres and enable the Council to support the objectives of:

- Promoting viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business;
- Sustaining and enhancing retail and commercial centres' vibrancy, viability and attractiveness; and
- Improving access to, and within retail and commercial centres, by all modes of transport, prioritising walking, cycling and public transport (PPW, para 4.3.3).

Ebbw Vale

26) Ebbw Vale is the largest town centre in Blaenau Gwent, both in terms of the total floorspace provided within the centre and the retail (Use Class A1) provision, and it is focused on the historic Bethcar Street / Market Street area which run north /south parallel to the A4046. These streets provide mainly small retail units in older shop units, although more modern mixed use development has occurred to the north, where the centre's main multi-storey car park is located as part of the Ebbw Vale Shopping Centre development.

27) Larger, more modern retail units are also provided centrally within the vicinity of The Walk and include several units occupied by national comparison retailers, a McDonalds and an Aldi store. All are served by surface car parking. These units and the closest units on Bethcar Street form the Primary Retail Area (PRA) where the main comparison offer is located.

28) The main convenience offer is also located in The Walk area, with Iceland being within the PRA and Aldi being just outside but within the defined town centre.

29) The centre also includes a number of banks and financial services, library and a public house in the former Picture House. These provide additional services in the northern parts of the centre.

30) The good convenience and comparison offer and below average vacancies suggests Ebbw Vale is a generally healthy town centre. The streetscape along Bethcar and Market Streets is generally of a high quality and the buildings are relatively well maintained. The centre has a higher proportion of national multiples than the other centres in Blaenau Gwent but is unable to provide the same offer as either Cwmbran town centre or Cyfarthfa Retail Park in Merthyr Tydfil. Despite this we consider that designation of Ebbw Vale as the Principal Town Centre within BGCBC remains appropriate.

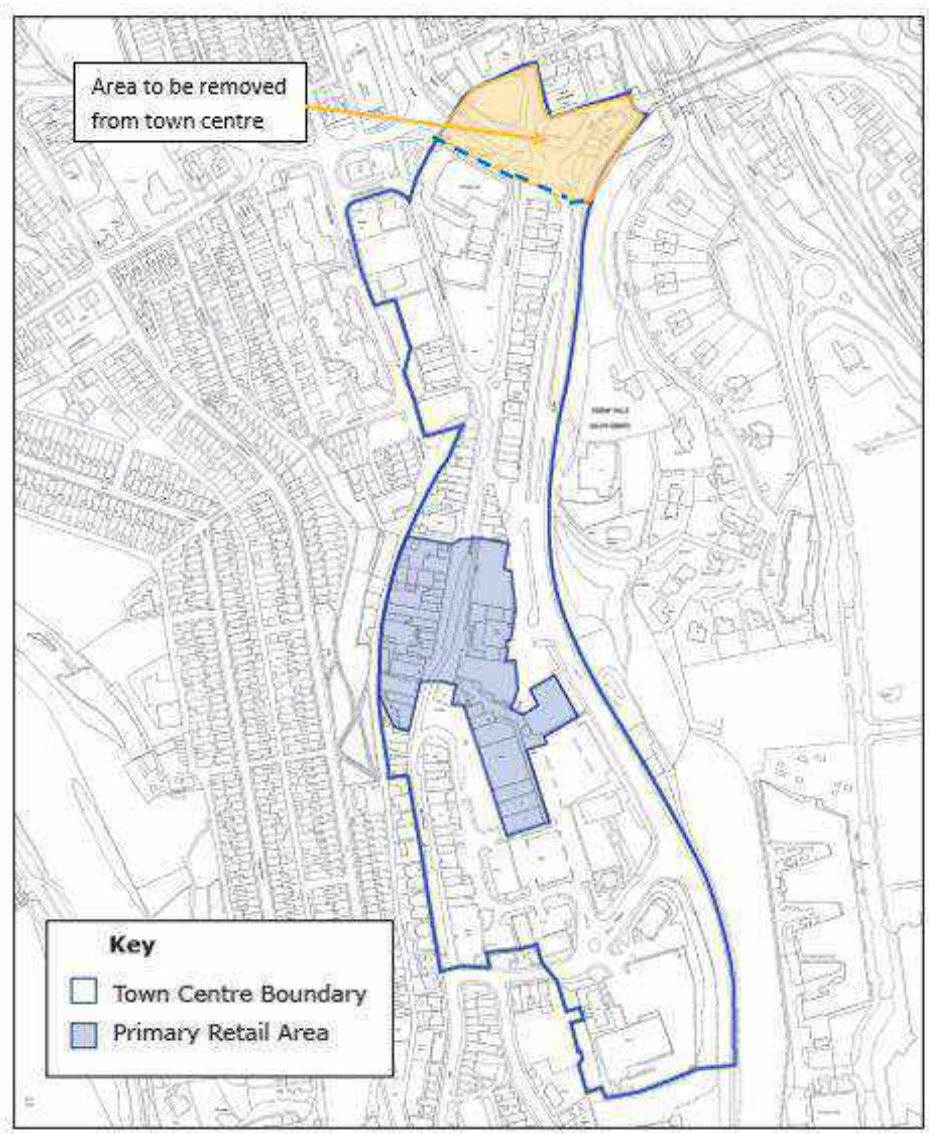
31) However, any further losses of retailers within The Walk have the potential to reduce the draw through this area weakening the potential for linked shopping trips from Aldi, a key draw to the centre, and there

would appear to be limited demand for new retailers to come to the town. This is evidenced by previously allocated sites in Ebbw Vale not having come forward for retail development.

32) Vacancy rates are not particularly high however, and we therefore consider that the current town centre boundary remains largely appropriate. Our only suggestion would be that the area north of the A4046 could be removed from the centre as it does not currently contribute to the health of the town centre and is physically separated from it.

33) The PRA in Ebbw Vale comprises the modern retail units to the south of the centre and the smaller, older units to the west of Bethcar Street. This is considered to remain appropriate going forward as it contains the larger units most likely to appeal to retailers in the future. The defined area also includes smaller units more likely to appeal to independents.

34) We therefore recommend that the PRA is retained as currently defined.



Abertillery

35) The defined town centre for Abertillery comprises two distinct areas, with the Primary Retail Area (PRA) covering Church Street and including a range of historic and more recent retail units. The northernmost properties adjoining Division Street / Foundry Bridge include the recently refurbished former Trinity Chapel and the entrance to the Anvil Court office premises, which has been developed to the rear of the older shop units on the west side of Church Street.

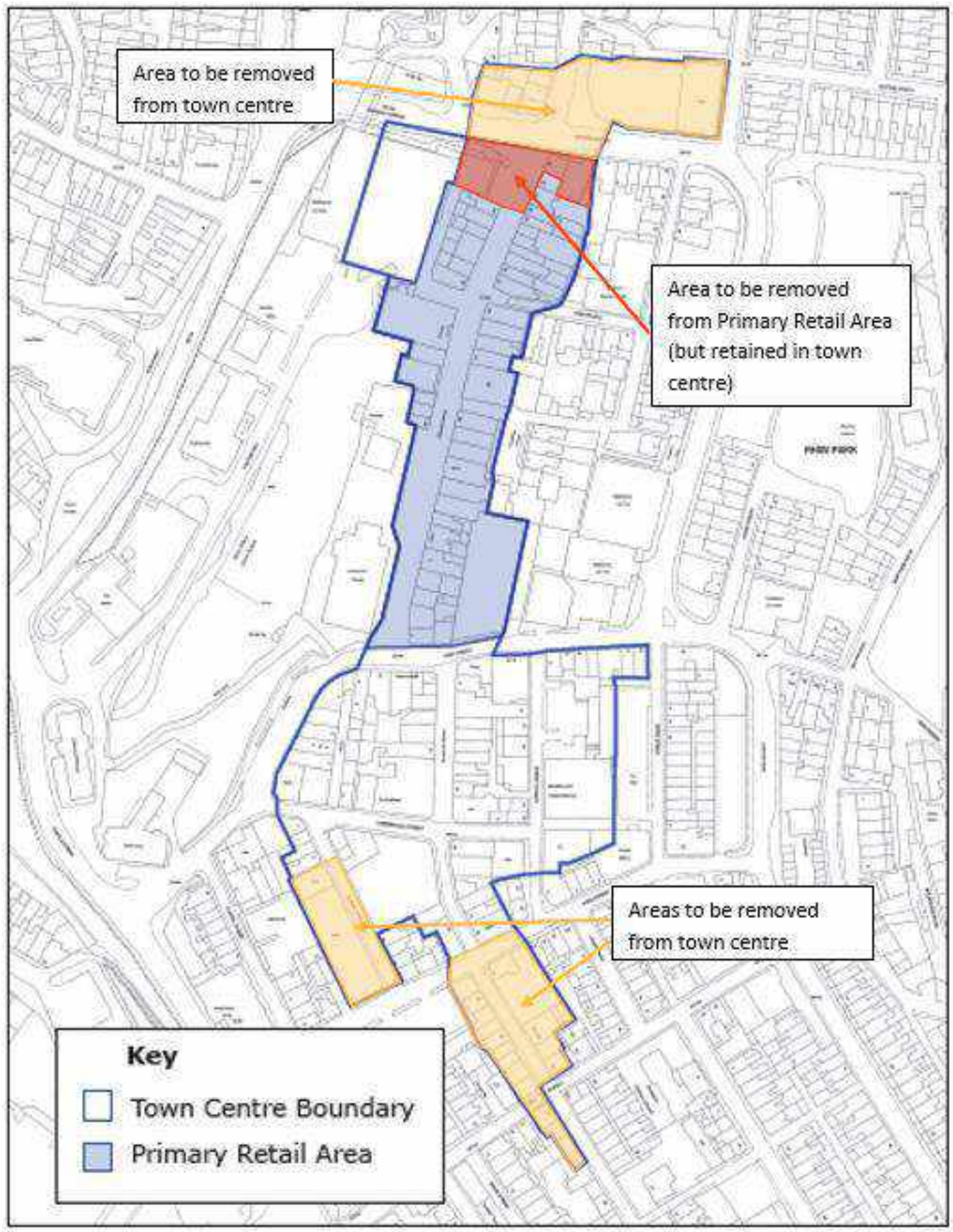
36) The town centre to the south comprises a small area of historic streets (Somerset Street, Market Street and High Street) including the Victorian Arcade and several older buildings of distinct character. The area also includes an Iceland foodstore in a more modern unit and The Met, a community arts, culture and business centre. Immediately adjoining the town centre boundary is the main decked car park for the town centre. Further west and separated from the town centre by changes in levels, are several community and service buildings, including the library. Beyond Castle Street and at a lower level again, is the modern Tesco store and petrol station with its own surface car parking.

37) The centre's retail provision is dominated by independent retailers, with only limited national multiple representation. The centre also has a limited financial services offer and the Post Office has moved from its own unit within Anvil Court to the Premier Store on Foundry Street.

38) Abertillery is a generally healthy and attractive centre that benefits from a good range of uses including employment in Anvil Court and a cultural/community offer at The Met. It is also likely to benefit from the draw of the edge-of-centre Tesco. However, the town centre appears to be oversized for its current role, as evidenced by the number of long term vacancies. The southern part of the town centre includes a number of buildings of character and The Victorian Arcade but lacks a clear role or focus of offer and the environmental quality of the area is poorer, making it less attractive.

39) Therefore, whilst we consider that the designation of Abertillery as a District Town Centres remains appropriate, the level of vacancies and particularly long term vacancies suggests that there is a need to reduce the size of the defined town centre. At present, the proportion of retail and other town centre uses declines south of Commercial Street and particularly south of King Street and removing some of these areas from the town centre is therefore recommended. The continued inclusion of the small number of properties north of Division Street should also be reviewed.

40) The PRA in Abertillery comprises the retail area along Church Street between Foundry Bridge / Division Street in the north and High Street in the south. This remains largely appropriate, but we would suggest that the area at the very north of Church Street is removed, given it does not provide a retail offer.



Brynmawr

41) Brynmawr town centre comprises two distinct areas, the relatively flat and open area around Market Square and the historic linear shopping street of Beaufort Street. The Primary Retail Area (PRA) is identified as the southern half of the latter. This area is dominated by independent retailers and services, the only significant national multiples represented being Lloyds Bank and the Post Office, both in the northern part of the centre.

42) The town centre offer is complemented by Lakeside Retail Park located some 300m (as the crow flies) to the south west of the town centre, which provides large modern retail units for Asda and several

comparison national multiples. These are a major draw to the town, but the linkage to the town centre is not particularly inviting and the proposed redevelopment of the NMC Factory and Bus Depot site has still to be completed.

43) Brynmawr is a generally healthy centre, despite the lack of national multiples and benefits from an attractive Market Place area, where the Market Hall cinema is also located. At the moment the town centre is performing relatively well but it has to be recognised that the centre is unique in that its main retail offer is at the nearby Lakeside Retail Park, outside of both the currently defined town centre and the PRA. As a result, the town centre has a different role and function from what would otherwise be expected, with the emphasis on mixed town centre uses and independent retail provision. However, it remains appropriately defined as a District Town Centre.

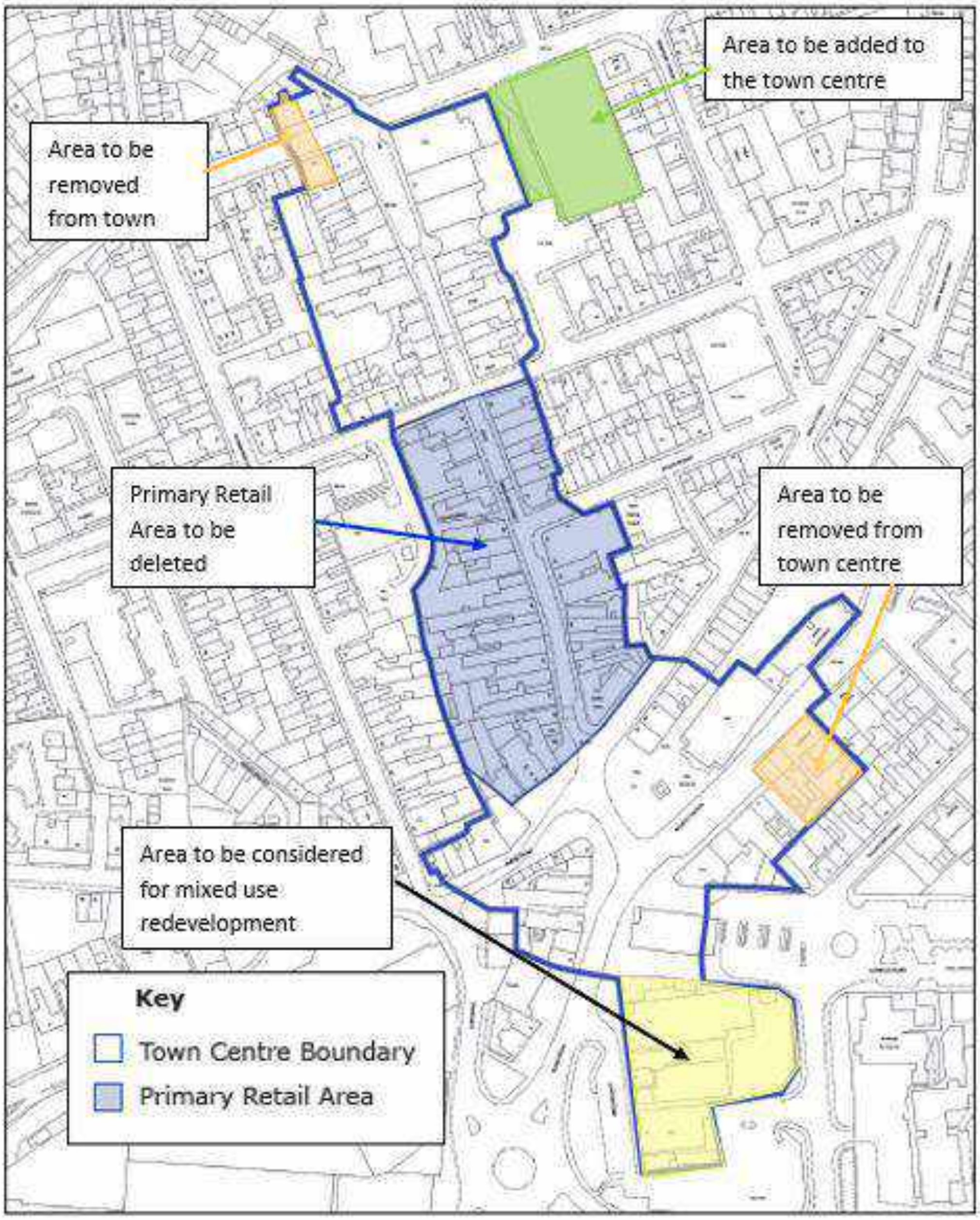
44) The long term success of the centre is likely to depend both on developing this complementary offer and seeking to increase interaction between the town centre and Lakeside Retail Park, given the significant footfall the latter attracts. If successful, this would be particularly beneficial for the area around Market Square, with the demand likely to be for complementary town centre uses.

45) In terms of the town centre boundary, we consider it would be appropriate to extend the town centre northwards to include the recent King Street development comprising One Stop and adjoining unit (proposed for restaurant use) but, with no quantitative or qualitative need to expand the centre, we consider there is potential to encourage other land uses at the northern end of Market Square, by removing a small number of properties from the town centre boundary. A small number of units on the west side of King Street could also be removed.

46) We have also reviewed the current role and future potential of the Station Road area, which, whilst within the town centre boundary and close to the bus station, provides a different mix of uses to the rest of the town centre. We do not see this changing in the foreseeable future, with the retail emphasis likely to continue to be towards the retail park. However, this area provides a different type and size of property to the rest of the centre and has the potential to accommodate other town centre uses where larger format / footprints are required or a mix of uses is appropriate. Further, such development on this site would offer greater benefit and potential linkage to the rest of the town centre.

47) We therefore recommend that this area is retained within the town centre, but the possibility of allocating it for mixed use redevelopment complementary to the rest of the town centre and the retail park should be explored.

48) Turning now to the PRA in Brynmawr this currently comprises the retail units at southern end of Beaufort Street. This area includes some of the larger retail units in the historic centre but future interest from the national multiples is more likely to centre on the retail park. This part of Beaufort Street no longer provides a different retail offer to the rest of the centre. We would therefore suggest that there is no policy requirement to define a PRA for Brynmawr and the current designation should be deleted.



Tredegar

49) Tredegar town centre is relatively large and has two distinct parts. The northern part is a linear centre running along Commercial Street and is formed of predominantly older shop units occupied by independent businesses. The northern part also includes the modern Gwent Shopping Centre, a precinct development that spans Stockton Way and links to the main surface car park for the centre. This provides larger modern retail units and forms the majority of the Primary Retail Area (PRA) along with the shops on the west side of Commercial Street.

50) The southern part of the centre includes the stretch of Castle Street running south from its junction with Commercial Street to The Circle. This historic area includes the Clock Tower and a number of larger

historic buildings, as well as the modern library complex. The whole area is included within the Tredegar Conservation Area and again, the main occupiers are independent businesses. However, the area also includes the main bank (Barclays) and a number of public houses.

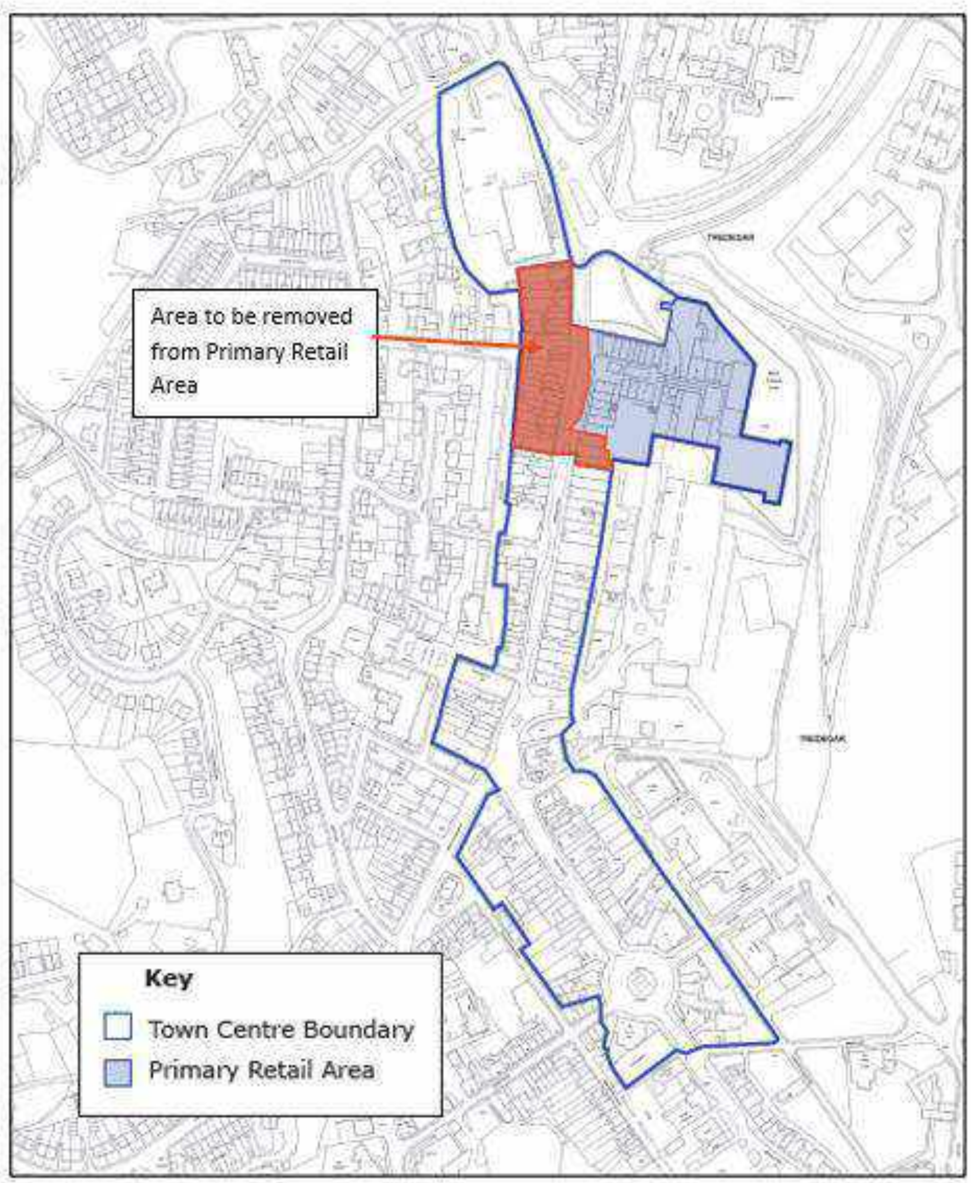
51) Tredegar is a relatively large centre and is generally healthy with average levels of vacancy in terms of floorspace. Its designation as a District Town Centre remains appropriate.

52) However, the location and long term nature of the vacancies, particularly within the Gwent Shopping Centre are a concern and are likely to be weakening the PRA. In contrast there is recent and on-going investment in the southern part of the centre, around The Circle, which appears to be well placed to meet an identified shortfall in leisure services including in the restaurant sector. The challenge will be to integrate the two parts of the centre and potentially reduce the amount of retail floorspace provided whilst maintaining the linkages and flows within the centre.

53) Overall, we consider the centre would benefit from a degree of consolidation, but the northern and southern parts of the centre are both important to its overall health and attractiveness and as such should be retained within the town centre boundary. As a result, we conclude that there is no current requirement to amend the boundary.

54) There is however, a need to consider how the two parts of the centre (Commercial Street and Castle Street) can be better integrated and developed in ways that complement and strengthen the centre as a whole.

55) We also recommend that the PRA is reduced in extent to cover the Gwent Shopping Centre and adjoining areas to consolidate the retail offer in the future.

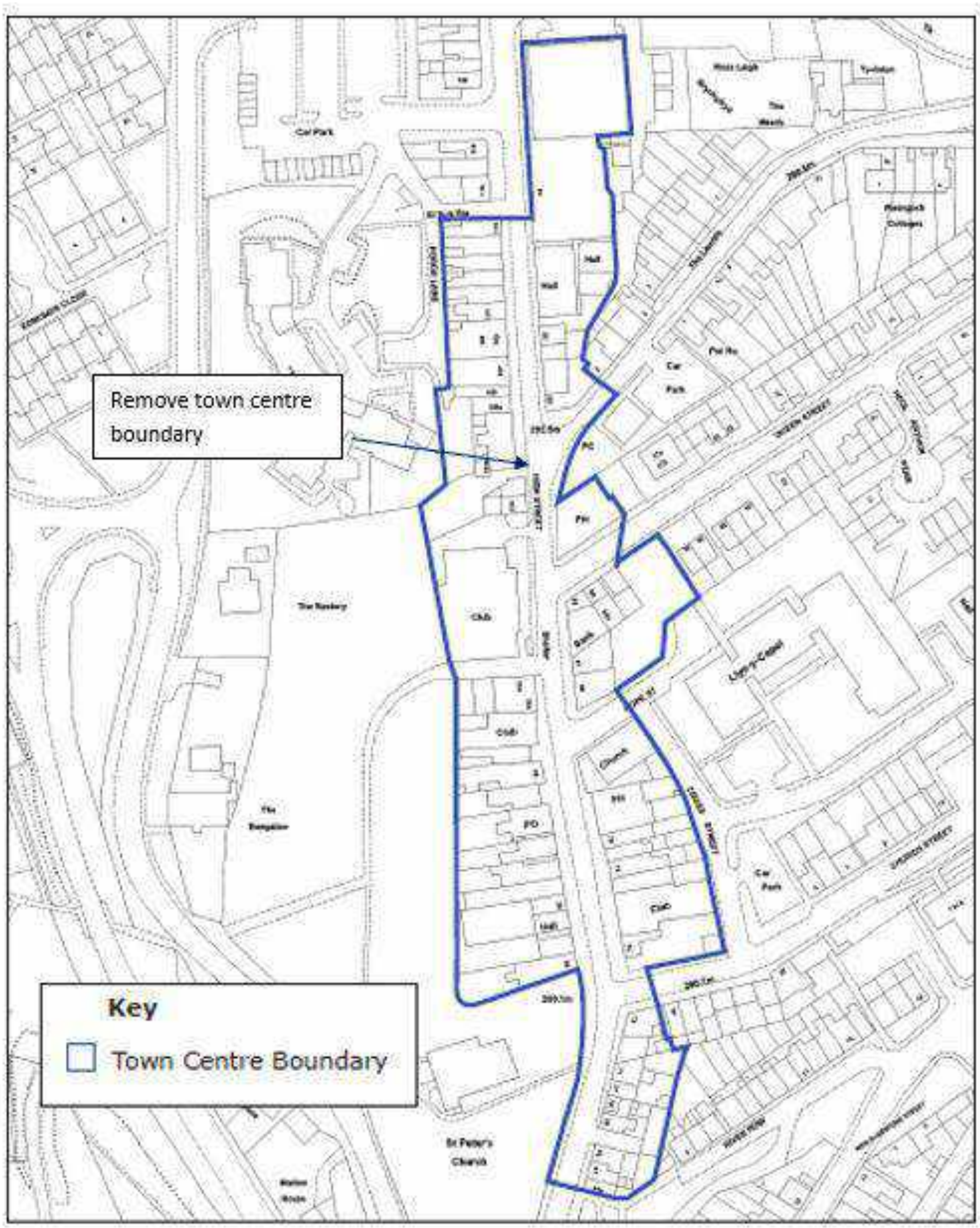


Blaina

56) Blaina is a local centre focused around the High Street and running from the Co-op foodstore in the north to the St Peter's Church area in the south. No Primary Retail Area (PRA) is designated and its retail, service and leisure offer is inter-dispersed with residential development. The centre includes several historic buildings and more modern development. With the exception of the Co-op and the Post Office all the businesses are independents.

57) Blaina is a weak centre in its current form as it contains a large number of vacant units, a considerable proportion of which have been vacant long-term. Several of the properties are also in poor condition. The nature of the centre also means that those shops and businesses which are trading well and serving the local community are separated by residential properties, reducing their impact and ability to support each other.

58) Blaina is larger than any of the neighbourhood centres in the Blaenau Gwent area but the nature of the offer and its primary purpose of meeting the needs of its local community is not considered to be significantly different. We would therefore suggest that there is no requirement to distinguish between Blaina and the neighbourhood centres in retail policy terms. A defined town centre boundary is therefore no longer appropriate.



Other LDP Policy Recommendations

59) Having established the retail hierarchy, town centre and Primary Retail Area boundaries which we consider should apply in the future, we have reviewed the current retail and town centre policies. These need to be updated to reflect the current and future needs of the centres.

Policy SP1 Northern Strategy Area – Sustainable Growth and Regeneration

60) Many of the principles set out in this policy remain valid (subject to any separate strategic review) and reflect the existing scale of the town centre offer within the Northern Strategy Area. Whilst there is no quantitative or qualitative need to allocate sites for retail development, it remains appropriate that any major expansion in the future should be focused on Ebbw Vale as the highest order retail / commercial centre in the County Borough.

61) The support for diversification of the economic base through mixed use development in the district hubs of Tredegar and Brynmawr where this supports and reinforces the roles of the town centres also continues to be an appropriate approach, given the important and sustainable role town centres have in providing for the needs of their local communities.

62) However, we would recommend that part (d) of the policy is updated as, whilst the expansion of the roles of town centres may be desirable, we consider that the focus for the district and local town centres should be on serving their local communities. Vibrant town centres that are popular with local residents are considerably more likely to attract tourists than tourism is to make a town centre vital and viable. However, such ambitions can be assisted by ensuring that a sequential approach to development is encouraged for all town centre uses, not just retail, as this improves the overall mix, offer and draw of a centre.

SP1 Northern Strategy Area – Sustainable Growth and Regeneration

Proposals in the Northern Strategy Area will be required to deliver sustainable growth and regeneration that benefits the whole of Blaenau Gwent. This will be achieved by: -

a) Supporting the creation of a network of sustainable hubs around the principal hub of Ebbw Vale.
b) Promoting Ebbw Vale as the principal hub for Blaenau Gwent, where the majority of social and economic growth will be accommodated including major retail expansion, administrative and cultural developments.
c) Delivering strategic sustainable regeneration flagship schemes at 'The Works' and 'Ebbw Vale Northern Corridor'.
d) Supporting ~~new~~ **and developing the** roles ~~for~~ **of Ebbw Vale and the** district ~~and local~~ town centres **to meet the culture, leisure and tourism needs of their local communities and visitors**.
    - ~~Tredegar District Town Centre will expand its tourism offer through maximising the benefits of local heritage;~~
    - ~~Brynmawr District Town Centre will explore opportunities to develop complementary roles around tourism; and~~
    - ~~Blaina Local Town Centre will build on and exploit its local heritage.~~

e) Enabling diversification of the economic base through mixed-use development in the district hubs of Tredegar and Brynmawr where it supports and reinforces the roles of the town centres.
f) Supporting a major destination attraction that would draw large numbers of people to the area and provide a significant number of jobs.

Policy SP2 Southern Strategy Area - Regeneration

63) The recognition that Abertillery town centre will have an important role in the regeneration of the Southern Strategy Area will continue to be an important policy consideration, as successful town centres are important for economic and social purposes.

64) However, consistent with the comments made regarding Policy SP1, we would suggest the emphasis for future policy should be on developing Abertillery town centre to meet the needs of the local population, rather than focusing on developing complementary roles around culture, leisure and tourism.

65) The household survey has shown that all the major centres in Blaenau Gwent have their own catchment area, and their future success will depend on meeting the needs of the residents within these areas. There will inevitably be a degree of overlap and trade leakage to higher order centres, as these provide more choice and range of goods and services. Improving public transport connections between Abertillery and Ebbw Vale may also result in the latter attracting some of the leakage from the Abertillery area. However, the effectiveness of such an approach will depend on the provision in Ebbw Vale relative to other nearby centres and the ease of access to the alternative offer from Abertillery.

66) For Abertillery, local geography and retail provision will always make Cwmbran an attractive choice for higher order shopping and service trips and, whilst the closure of the Festival Shopping Outlet Centre may provide some benefits for Ebbw Vale, reliance should not be placed on securing trade from the Abertillery area.

SP2 Southern Strategy Area – Regeneration

Proposals in the Southern Strategy Area will be required to regenerate the area by: -

a) Ensuring that the district hub of Abertillery is well connected with its hub area, Ebbw Vale and the wider region through safe, frequent and reliable public transport links;
b) Supporting Abertillery District Town Centre in developing **its role as a centre to meet the** ~~complementary roles around~~ culture, leisure and tourism **needs of its local community and visitors**;
c) Delivering 'Activity Tourism' opportunities in the area;
d) Ensuring the removal of dereliction by promoting the reuse of under used and derelict land and buildings;
e) Delivering regeneration schemes which provide residential development and infrastructure; and
f) Building on the unique identity of the area by protecting and enhancing the built heritage and the natural environment.

Policy SP3 The Retail Hierarchy and Vitality and Viability of the Town Centre

67) The retail hierarchy in Part 1 of Policy SP3 needs to be updated to reflect the proposed change to Blaina and we would suggest that the neighbourhood centres should also be listed in the policy.

68) Part 2 of the policy seeks to improve the vitality and viability of town centres. There has been no change in the need to improve town centre vitality and viability and as such the policy basis for this part of Policy SP3 remains. However, we would suggest that 2(b) should be updated to reflect the importance of other town centre and community uses in addition to retail.

69) Part 3 of Policy SP3 sets out the retail floorspace requirements during the plan period to 2021. This element of the policy is no longer required as there is no requirement to allocate any sites for retail development during the plan period.

SP3 The Retail Hierarchy and Vitality and Viability of the Town Centres

1) In order to deliver thriving town centres and protect local shopping facilities a retail hierarchy is defined as follows:

Principal Town Centre

a) Ebbw Vale will perform a sub-regional retail role.

District Town Centres

b) Abertillery, Tredegar and Brynmawr will act as district shopping centres principally to serve the needs of their districts. Brynmawr District Town Centre will be linked to the ~~new~~ retail provision at Lakeside Retail Park <u>**and the former NMC factory site**</u>.

~~Local Town Centre~~

~~c) Blaina will act as a local shopping centre that will be protected and enhanced to provide facilities for the local community.~~

Neighbourhood Centres

d) Local shops in <u>**the**</u> neighbourhood centres <u>**listed below**</u> will be protected to meet every day local shopping needs.

i. <u>**Abertillery, Alexandra Road**</u>

ii. <u>**Abertillery, Commercial Road**</u>

iii. <u>**Blaina**</u>

iv. <u>**Cwm, Canning Street**</u>

v. <u>**Cwm, Marine Street**</u>

vi. <u>**Cwm, Mill Terrace**</u>

vii. <u>**Ebbw Vale, Beaufort Rise**</u>

viii. <u>**Ebbw Vale, Cambridge Gardens**</u>

ix. **Ebbw Vale, Church Street**

x. **Ebbw Vale, Park Place, Waunlwyd**

xi. **Ebbw Vale, Queensway, Garnlydan**

xii. **Ebbw Vale, Tredegar Road, Hilltop**

xiii. **Swffryd, Walters Avenue**

xiv. **Tredegar, Attlee Way**

xv. **Tredegar, Park Place**

2) In order to improve the vitality and viability of the town centres:

a) Shops, offices and other commercial premises, where appropriate, will be upgraded by means of refurbishment and redevelopment;

b) Opportunities to improve the retail, **service and leisure** offer will be implemented;

c) The provision of better vehicular access and circulation arrangements, improved public transport facilities and provision of additional car parking spaces will be provided where necessary; and

d) Disabled access and facilities will be improved.

~~3) In order to address local retailing needs, provision for 10,200 sq m of comparison and 2,445 sq m of convenience floorspace is required over the plan period.~~

DM5 Principal and District Town Centre Management

70) This policy, which applies to Ebbw Vale, Abertillery, Brynmawr and Tredegar both defines Primary Retail Areas (PRAs) and sets out the polices which will apply. It also seeks to improve the vitality and viability of the town centres through the refurbishment / redevelopment of existing properties and other opportunities, the provision of better accessibility and circulation arrangements and improved disabled access.

71) However, given the various structural changes that have been seen in the retail sector and shopping behaviour, a policy that rigidly seeks to retain A1 uses in any location, risks increasing vacancies.

72) Thus, whilst retail is an essential component of any town centre and a policy that seeks to protect core areas remains appropriate, it is also important that such areas are not disadvantaged if the demand for retail space is limited.

73) A town centre's vitality and viability can be supported by a range of different uses and their relative importance varies between locations and over time. Indeed, some appropriate town centre uses may not even have been identified at the present time and may emerge as technology or other markets evolve.

74) It is therefore important that the policy response is flexible enough to adapt to changing circumstances, whilst providing appropriate policy guidance.

75) With respect to PRAs it is our view that a policy that seeks to restrict such areas to retail uses only is no longer appropriate, and going forward policies need to balance the preference for retail alongside encouraging other appropriate uses. In this respect, the relevance is less that of the end use but its contribution to town centre vitality and viability, particularly during daytime trading hours.

76) We would suggest Policy DM5 could be updated as follows:

DM5 Principal and District Town Centre Management

Development proposals incorporating a change of use of ground floor premises in Principal and District Town Centres will be subject to the following management:

a) **Where** Primary Retail Areas are identified, **the Council will seek to retain and enhance** ~~only~~ A1 uses ~~will be permitted~~ **whilst seeking a reduction in the number of vacant ground floor commercial uses. Proposals for the change of use, or redevelopment of premises away from retail (Use Class A1) will only be supported where it can be demonstrated that:**

   i. **The proposal will contribute to the centre's vitality and viability during daytime trading hours; and**

   ii. **Proportionate evidence has been provided to demonstrate that the premises are no longer required for retail purposes.**

b) Outside of defined Primary Retail Areas but within the Town Centre boundaries:

   i. A2, **B1, C1**, D1 and D2 uses will be encouraged; ~~outside the Primary Retail Area.~~

   ii. **Food and drink uses (Use Class A3) that operate principally during normal daytime trading hours will be encouraged;**

   iii. **Other** A3 uses **that principally operate outside daytime trading hours** will not be permitted where they harm the vitality, ~~and~~ viability ~~and retail~~ **or** mix of **uses in** the area as a result of a proliferation of this type of use; **and**

   iv. **The change of use of the ground floor units to residential use will be permitted where the use is appropriate and in accordance with other policies within this plan and National Planning Policy. The introduction of residential uses will not be permitted where it will fragment the retail and commercial frontages or impact on the vibrancy and viability of the centre.**

~~c) Within the town centres, the change of use of the ground floor units to residential use will not be permitted.~~

DM6 Management of Blaina Local Town Centre

77) On the basis of our advice above, there is no requirement to distinguish between Blaina and the neighbourhood centres in retail policy terms. We also consider that the definition of a centre boundary is of less relevance in Blaina and other smaller centres, given the greater mix of uses and more dispersed nature of the retail offer.

78) We would therefore suggest that a new policy relating to retail and commercial uses in such centres be included instead of the existing policy DM6, which would cover a wider range of centres and circumstances.

DM6 Management of ~~Blaina~~ ~~Local Town Centre and~~ Neighbourhood Centres

Development proposals incorporating a change of use of ground floor premises in ~~Blaina Local Town Centre~~ **the Neighbourhood Centres (including Blaina),** will be subject to the following management:

a) Retail, professional and financial services, entertainment and leisure and community uses will be supported.

b) A3 uses will not be permitted where they harm the vitality, and viability and retail mix of the area as a result of a proliferation of this type of use.

c) ~~In the case of a~~ Change of use to residential **use**, **will be permitted where the use is appropriate and in accordance with other policies within this plan and National Planning Policy and where it will not impact on the vibrancy and viability of the centre** ~~the retention of the retail site for retail/commercial purposes has been fully explored without success by way of marketing for appropriate retail/commercial purposes at reasonable market rates for a minimum of 12 months~~.

MU1 Ebbw Vale Northern Corridor

79) As a strategic mixed-use allocation, a review of the Ebbw Vale Northern Corridor Framework is outside the scope of this study. However, the inclusion of a commercial leisure hub, and other leisure-related uses would remain appropriate provided such uses could not be accommodated within Ebbw Vale town centre. Development in the Northern Corridor should complement, rather than compete with the existing retail and commercial centres.

80) The quantitative need for specific provision has not been identified in this study, but we would suggest that any commercially viable site in this location is likely to draw on a wider catchment area than the existing town centres, and, depending on the nature of the offer, could draw from outside of the County Borough.

81) We would also suggest that any proposals for food and drink provision should be intrinsically linked to the rest of the leisure offer and not provided as separate / standalone units which otherwise may be capable of development within Ebbw Vale or Tredegar town centres.

MU3 NMC Factory and Bus Depot

82) This site continues to be an important link between Lakeside Retail Park and Brynmawr Town Centre and the implementation of the approved retail development is to be welcomed.

83) Until this permission has been implemented and the development is complete, it would be advisable to retain the site allocation in the LDP. However, we would suggest it should remain as an edge-of-centre, rather than an in-centre site, to ensure its use remains as complementary to the town centre.

AA1 Action Areas

84) There is no longer any quantitative need for additional convenience or comparison provision in Ebbw Vale or the County Borough during the period to 2033, but the Southern Gateway and Market Square sites remain potential development opportunities that could benefit the town centre.

85) The Southern Gateway site is within the defined town centre and as such would remain a sequentially preferable site for retail or other town centre uses. We therefore do not consider that any specific retail policies are required for the site.

86) The Market Square site is partially within the defined town centre and partly outside (edge-of-centre), although we have suggested that the town centre boundary should be adjusted in this area to remove it from that designation.

87) The redevelopment of the area as an important link between the existing centre and the Northern Corridor development would not be affected by these changes, and it would remain sequentially preferable to any out of centre sites for retail and other town centre uses. However, with no quantitative need for additional retail provision, it is considered that the current allocation should be removed.

R1 Retail Allocations

88) Of the 6 sites allocated for retail development in the current LDP, none have come forward for development to date. There is therefore no requirement to retain the allocations in the replacement plan. Specifically:

- R1.1 Rhyd y Blew Retail Park, Ebbw Vale – this site has planning permission for 6,000 sqm net of non-food retail floorspace and, it is our understanding that the development has been partially implemented and thus, this is an extant permission. This means it could come forward for development at any time. However, it is not necessary to retain it as an allocation and instead it should be treated as any other out of centre retail site should new proposals come forward;
- R1.2 Extension to Festival Shopping Outlet Centre, Ebbw Vale – this permission has expired;
- R1.3 Tesco Extension, Ebbw Vale – this permission has expired;
- AA1.1 Southern Gateway, Ebbw Vale – discussed above. This allocation is no longer required but the site is within the town centre and thus should be considered as a potential sequential site should retail or the development of other town centre uses be promoted;
- AA1.2 Market Square, Ebbw Vale – discussed above. This allocation is no longer required but the site is partly in and partly on the edge of the town centre and thus should be considered as a potential sequential site should retail or the development of other town centre uses be promoted;
- R1.4 Market Square, Ebbw Vale – This allocation is no longer required but the site is within the town centre and thus should be considered as a potential sequential site should retail or the development of other town centre uses be promoted.

TM1 Tourism and Leisure

89) Policy TM1 allocates 7 sites for tourism related activities, some of which include the provision of leisure uses. We have therefore reviewed the allocated sites and would comment as follows:

- TM1.1 Eastern Valley Slopes – This allocation relates to outdoor recreation and leisure uses and as such is outside the scope of this study;
- TM1.2 Garden Festival – The closure of the Festival Park Outlet Centre is likely to mean that a wider review of the site's future is required. As such the relevance of continuing to promote the site as a major tourist destination is outside the scope of this study, although it seems unlikely that uses that could be promoted here would otherwise consider locating in any of the Blaenau Gwent town centres;
- TM1.3 Blue Lakes - This allocation relates to outdoor recreation and leisure uses and as such is outside the scope of this study;
- TM1.4 Bedwellty House and Park – This allocation relates to a network of historic buildings and landscapes and as such provide a different tourist offer to anything that could be provided in the town centres;
- TM1.5 Parc Bryn Bach (including a hotel) – This allocation relates to a countryside and recreational attraction and as such is outside the scope of this study;
- TM1.6 Nantyglo Roundhouse Towers – This allocation relates to a heritage asset and is outside the scope of this study; and
- TM1.7 Cwmtillery Lakes - This allocation relates to outdoor recreation and leisure uses and as such is outside the scope of this study.