

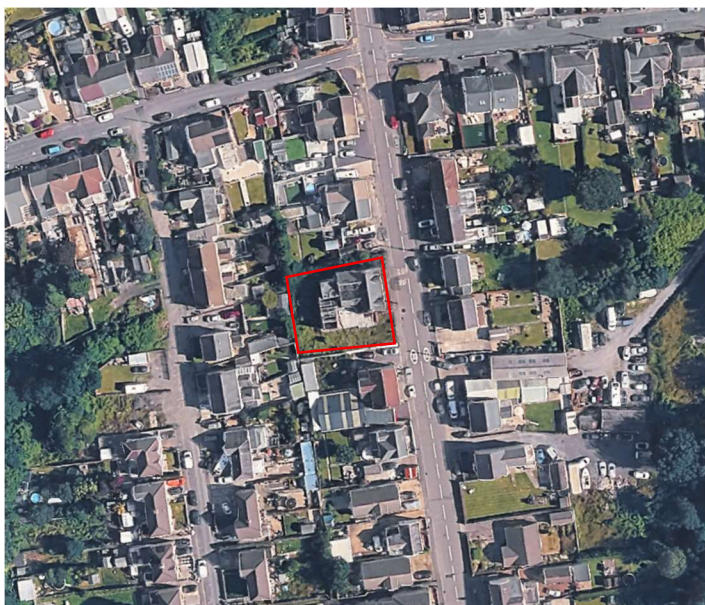
Sequential Assessment

Preface

- 1.1. The Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial development (Planning Policy Wales, paragraph 4.3.18).
- 1.2. The sequential approach requires development proposals to prioritise locations within designated centres, followed by edge-of-centre sites and, only where suitable sites are not available, out-of-centre locations that are accessible by a choice of transport modes.
- 1.3. This Assessment has been undertaken and prepared to assess the proposal's compliance with the policy requirement.
- 1.4. It should be noted that an assessment of the need for the proposed retail use, and an assessment of the potential impact of the proposal on the vitality and viability of the defined centres or investment within them is set out separately to this assessment – in the Retail Need & Impact Assessment undertaken by Reeves Retail. This assessment should be read in conjunction with the Reeves Retail assessment accordingly.
- 1.5. As such, this assessment concerns compliance with the sequential test – which means showing that for retail developments proposed on sites outside of defined centres, there is no suitable and available site for a similar development, either in the centre or on its edge.
- 1.6. The scope of this assessment, and the sites needing to be assessed, has been discussed with, and agreed by, the Local Planning Authority – in pre-application dialogue. This has identified two potential sites in need of assessment. Details of these sites is set out later in this submission.

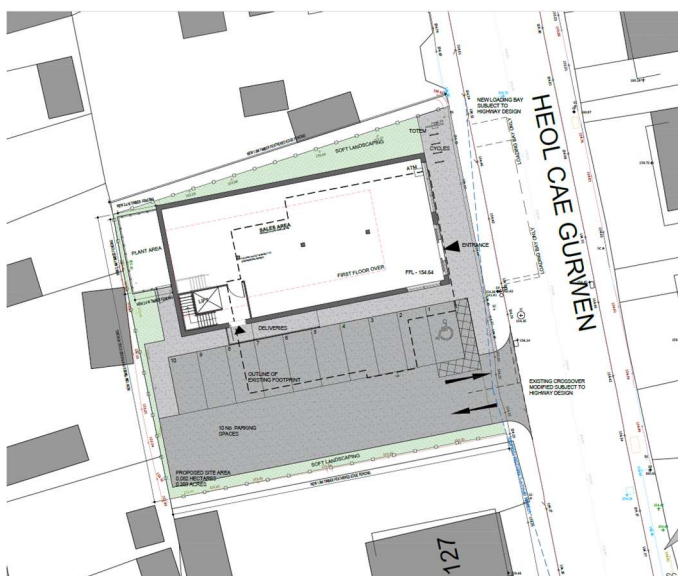
The Site / The Proposal

- 1.7. Prior to undertaking any assessment, it is necessary to set out the proposal, and the site that it is proposed to be accommodated on.
- 1.8. The proposed development site is located on Heol-Cae-Gurwen, the main thoroughfare through the established residential village of Gwaun-Cae-Gurwen. The site currently comprises a derelict former club building, with areas of overgrown vegetation to the rear. The site is classified as a previously developed (brownfield) site located within defined settlement limits.
- 1.9. An aerial image depicting the site's location can be seen below for reference.



Aerial view of the site (approximate site outline in red)

- 1.10. As set out in more detail with the Planning Statement, the proposed development comprises the Demolition of Former Club and Development of a Tesco Express Store. For ease of reference, the plans submitted in support of the application can be found below.



Proposed Site Plan

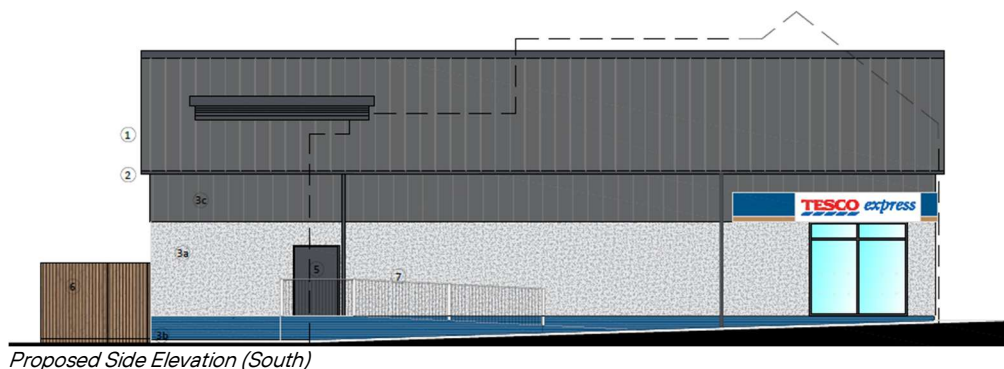
(N.B. - Dashed line shows outline/footprint of the existing building)



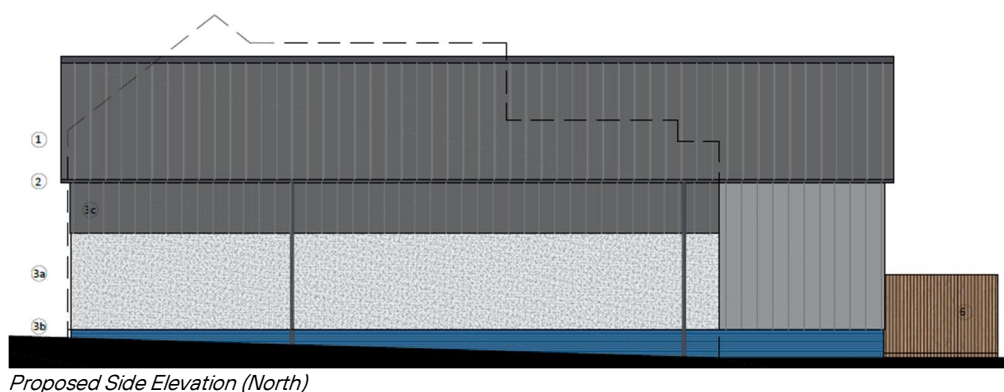
Proposed Front Elevation (East)

Rear Elevation (West)

(N.B. - Dashed line shows outline/footprint of the existing building)

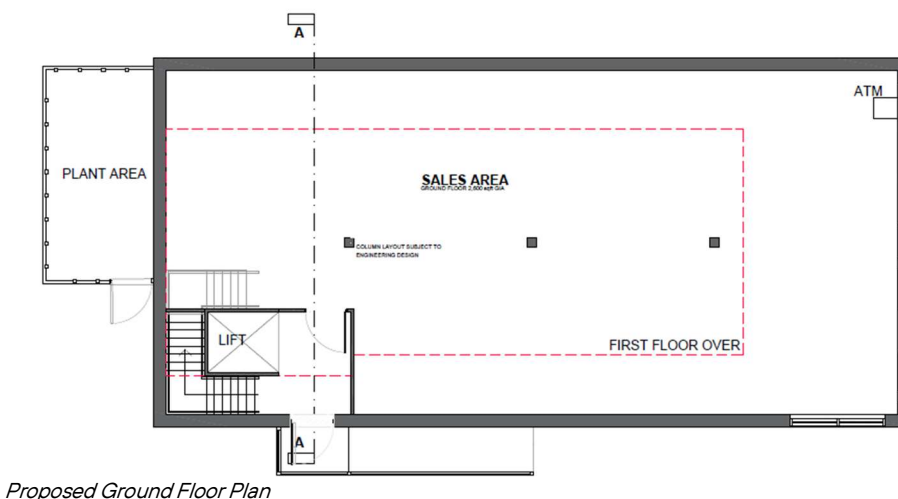


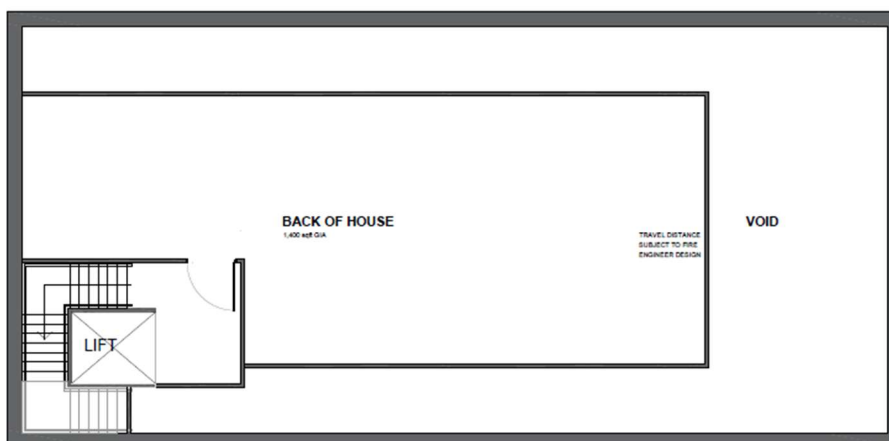
(N.B. - Dashed line shows outline/footprint of the existing building)



(N.B. - Dashed line shows outline/footprint of the existing building)

Floor Plans





Proposed First Floor Plan

Planning Policy Position

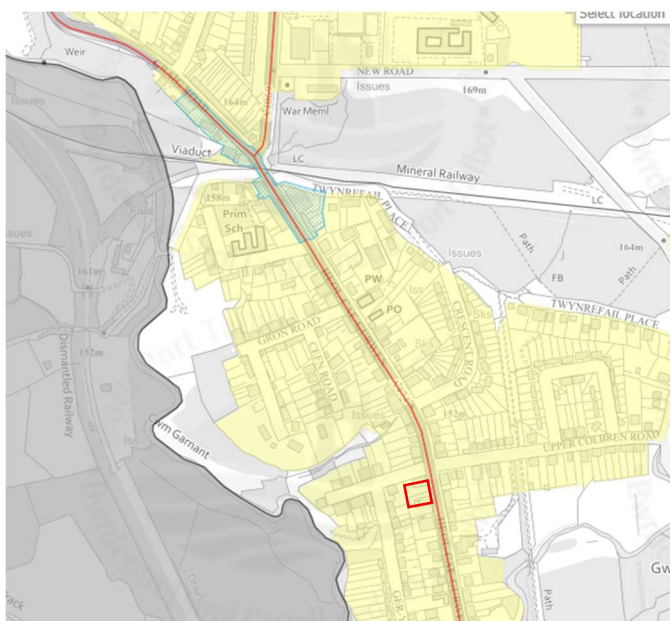
National Planning Policy

- 1.11. National Planning Policy is set out in the Welsh Government's Planning Policy Wales (PPW), the most recent edition of which was published in February 2024 (Edition 12). It is supplemented by a number of Technical Advice Notes (TANs) which provide additional Government guidance on topic specific matters, including TAN 4: Retail and Commercial Development.
- 1.12. The purpose of PPW is to set out the land use planning policies of the Welsh Government and has the primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
- 1.13. The Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. In implementing this policy, PPW requires that applicants seeking permission for retail and town centre uses outside of defined town centres demonstrate:
- A need for a proposed retail use. This need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative, with precedence given to the former particularly as the basis for development plan allocations (para 4.3.15). Considerations that may represent qualitative need are set out in para 4.3.16 and include factors such as:
 - The site being highly accessible by walking, cycling or public transport;
 - The proposal contributing to a substantial reduction in car journeys; or
 - The proposal addressing locally defined deficiencies in provision in terms of quality and quantity, including where it may alleviate a lack of convenience goods provision in a disadvantaged area.
 - Compliance with the sequential test, which means showing that for retail developments proposed on sites outside of defined centres, there is no suitable and available site for a similar development, either in the centre or on its edge; and

- That the proposal will not have a significant adverse impact on the vitality and viability of the defined centres or investment within them. A retail impact assessment is specifically required for developments of 2,500 sqm gross or more, but TAN4 confirms that retail impact assessments may be required for smaller developments but should be proportionate to potential impacts.

Local Planning Policy

- 1.14. The current adopted Development Plan for the Local Planning Authority comprises the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) which was formally adopted by the Council on the 27th January 2016.
- 1.15. Extracts of the adopted LDP Proposals Map and Constraints Map are provided below:

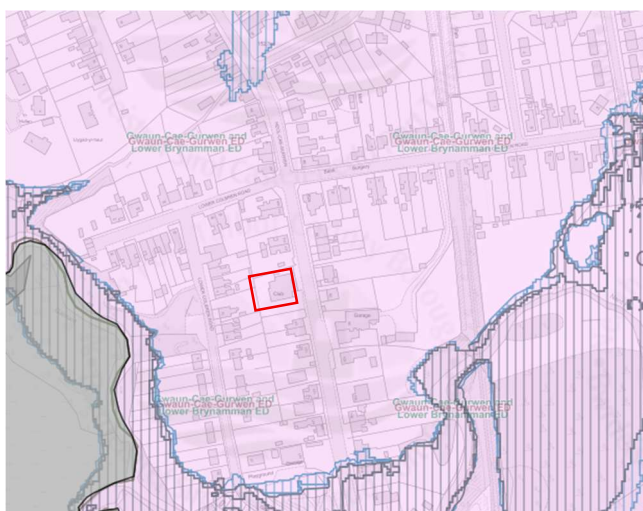


Proposals Map (Approximate Site Location Outlined in Red)

Key	Description
	Site
	Settlement Limit
	Core Road Network
	Local Centre

- 1.16. The LDP Proposals Map (as extracted above) confirms that the site is:

- Located within the Settlement Boundary;
- Located adjacent to Core Road Network; and
- In close proximity to the Local Centre.



Constraints Map (Approximate Site Location in Red)

Key	Description
	Site
	Amman Valley
	River Flood Zone 2
	River Flood Zone 3

1.17. As per the above LDP Constraints Map, the site is:

- Located in the Amman Valley; and
- Not affected by any Flood Risk Designations.

1.18. Based on the map extracts above, and in consideration of the nature of the proposed development, a number of policies are of relevance to the proposals. These are set out in detail in the submitted Planning Statement.

Sequential Assessment

Background

- 1.19. First and foremost, it is important to note that the proposed development is seeking to address a long standing market requirement for, and accordingly needs to be located within, Gwaun Cae Gurwen. This is confirmed by E.J. Hales (Appendix D – E.J. Hales Letter), which highlights the long-standing and pressing need for an additional store in this location. The correspondence confirms that E.J. Hales have acted as Tesco's agents in Wales for over 50 years and explains the process by which target locations are identified, with particular emphasis on recognising areas that are underserved in terms of convenience store provision. This demonstrates the practical need for a new store within Gwaun Cae Gurwen, based on Tesco's operational requirements, the identified deficiency in local convenience shopping provision, and the leakage of expenditure that is known to take place.
- 1.20. In addition, the Retail Assessment prepared by Reeves Retail Planning Consultancy demonstrates the theoretical need for a convenience store within Gwaun Cae Gurwen. The Assessment identifies sufficient expenditure capacity within the catchment area to support additional convenience retail floorspace, thereby establishing a quantitative need for the proposed development. The Retail Assessment also identifies a considerable leakage of expenditure from the catchment and locality. This evidence confirms that the local area has the economic capacity to sustain an additional convenience store, further supporting the proposal in principle

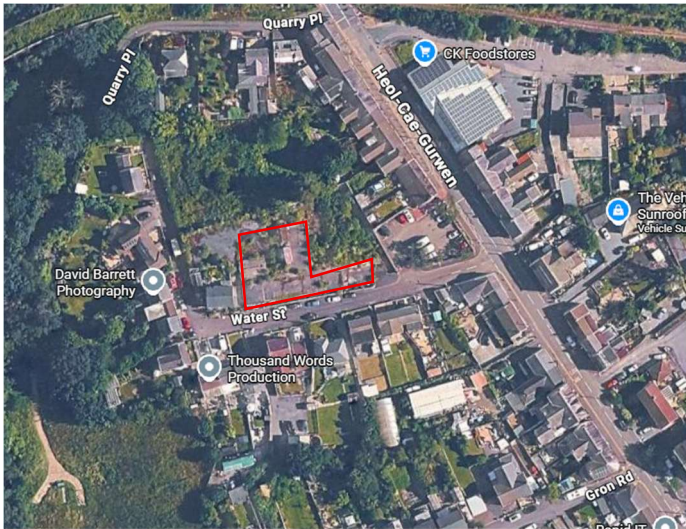
Identified Sites

- 1.21. In assessing potential alternative sites and premises, extensive pre-application dialogue with the LPA has been undertaken. Over and above this, the following requirements have been applied to determine whether there are any other (potentially sequentially preferable) sites that are suitable for the proposed development:
- The site must be located within Gwaun Cae Gurwen;
 - Any alternative site or unit must be able to provide a similar amount of floorspace as the proposed 372 sqm proposed by the development. Some reduction in floorspace may be possible if the internal layout is appropriate, but anything significantly smaller would not be suitable as it would meet a different market requirement. Accommodating a use in a unit larger than necessary is also likely to increase operational and business costs unnecessarily, and therefore units above 1000 sqm are unlikely to be suitable for the proposed use;
 - Any site or unit must be capable of being serviced appropriately; and
 - Any site or unit must be able to provide some car parking on site or have convenient access to parking nearby. No minimum requirement is set out in the sequential assessment to ensure sufficient flexibility is demonstrated, in identifying potential sites but some provision is required.
- 1.22. A review of vacant sites and premises within and adjacent to the Local Centre has been undertaken through site visits and online investigations, and the scope of this has been agreed with the LPA.
- 1.23. Several vacant units were identified; however, these are significantly smaller than the floorspace required to accommodate the proposed store, and can therefore be discounted on suitability grounds. These include:

- 1A Heol Cae Gurwen;
- 45 Heol Cae Gurwen; and
- 47 Heol Cae Gurwen.

1.24. The remaining sites identified through the assessment and the Council's pre-application response to the extensive dialogue held, are considered below. At the outset there are no 'within centre' locations that need to be assessed, as none exist.

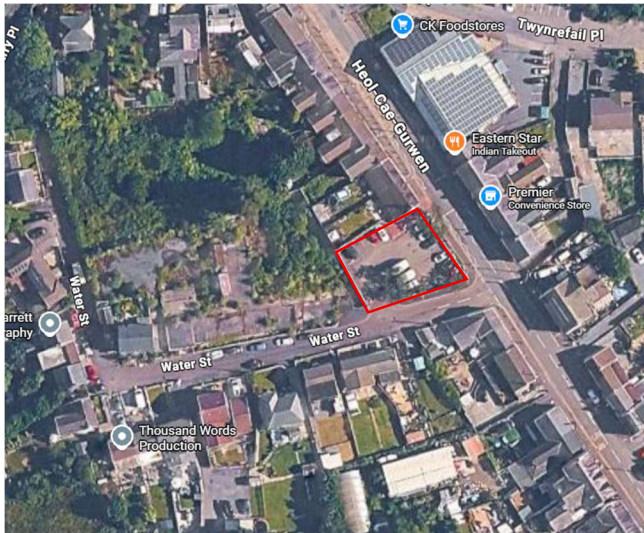
Site 1 – Water Street (Former School)

Site Details	
Site Location	Located on Water Street, a residential cul-de-sac accessed from Heol Cae Gurwen, within the settlement of Gwaun Cae Gurwen. An extract showing the site and its location can be found below:  <i>Aerial Imagery of Site, Approx. Site Location Outlined in Red</i>
Photos	

Site Size	The site comprises / amounts to circa. 1200sqm.
Site Status / Classification	Previously developed land – site of former school (now demolished) Within defined settlement limits.
Relationship to Local Centre	In relation to the site's relationship with the defined Local Centre, it can be seen from the Neath Port Talbot Policies Map below that the site is located outside of, albeit in close proximity to, the designated Local Centre. The site would be classed as 'Edge of Centre' for the purposes of any Sequential Site Assessment.  <i>Approx. Site Location Outlined in Red</i>
Road Frontage	As can be seen from the aerial imagery and site photos, the site is located on a residential street, and is accessible via a junction with Heol Cae Gurwen – the main thoroughfare. The site does not benefit from a prominent road frontage, and is not situated along a main thoroughfare within the settlement.
Highways / Access	The site is access via Water Street – a narrow, residential street. The proposal would require regular HGV deliveries, and it is considered that delivery vehicles would experience difficulties accessing, manoeuvring and turning within the surrounding road network. Accordingly, the site's highway / access arrangements weigh against its suitability for the proposed development.
Suitability	The site is large enough to accommodate the proposed store and associated car parking. The site is accessed via a small residential street, which is part centre lined to the first (eastern) section, albeit not for its entire length (including that part of the site frontage from where access will need to be gained. Deliveries to any proposed store would likely give rise to highways conflict. The site has limited visibility with the main roadway thoroughfare through the settlement, and would be of little appeal to commercial operators as a result.
Availability	The site benefits from an extant planning permission for the development of 10 dwellings (planning application reference P2022/0726). The owners / developers of the site and scheme have confirmed in writing that : " <i>Our intention is to develop the site for residential houses as per the approved planning</i>". The site is therefore not available for the proposed retail development.

Deliverability / Conclusion	The site is committed to an alternative land use – a residential scheme will planning permission. The site owners have confirmed that it is not for sale. The site has restricted access / frontage – both in highway and commercial operator appeal terms. The site is neither available or deliverable for the proposed use / development.
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Site 2 – Council Owned Car Park

Site Details	
Site Location	The site is located on Heol Cae Gurwen and is accessed via Water Street. The site serves as the primary car parking area for the Local Centre. An extract showing the site's location and context is provided below.  <i>Aerial Imagery of Site, Approx. Site Location Outlined in Red</i>
Photos	

	
Site Size	The site comprises 571 sqm. The site is too small to accommodate the proposed development.
Site Status / Classification	Previously developed land – an existing public car park (in use) Within defined settlement limits.
Relationship to Local Centre	In relation to the site's relationship with the Local Centre, the extract below demonstrates that the site lies outside, but directly adjoining, the defined Local Centre boundary. The site would be classed as 'Edge of Centre' for the purposes of any Sequential Site Assessment.  <i>Approx. Site Location Outlined in Red</i>
Road Frontage	Whilst the site fronts onto Heol Cae Gurwen, the existing vehicular access is taken from Water Street, a residential road. As such, direct access to the site is not provided from the principal commercial frontage of Heol Cae Gurwen.
Highways / Access	Whilst the site fronts onto Heol Cae Gurwen, vehicular access is obtained via Water Street. A convenience store would require regular HGV deliveries, and it is considered that delivery vehicles would experience difficulties accessing, manoeuvring and turning within the surrounding residential road network Accordingly, the site's highway / access arrangements weigh against its suitability for the proposed development.

Suitability	The site is not large enough to accommodate the proposed store and associated car parking. The site is accessed via a small residential street, which is part centre lined to the first (eastern) section. The site has visibility with the main roadway thoroughfare through the settlement, and would be of appeal to commercial operators as a result.
Availability	The site functions as a / the key public parking facility serving the defined retail centre of Gwaun Cae Gurwen. Its redevelopment would result in the significant loss of essential parking provision that supports the hierarchy, accessibility, and functioning of the centre. The removal of this facility would be likely to undermine the vitality and viability of the retail centre, contrary to the objectives of Policy R2. In particular, Criterion 1, which seeks to ensure that development within designated centres <i>"enhances the vitality, viability and attractiveness of the centre"</i>. The loss of the car park would fail to meet policy requirements. The owners of the land (NPT Council) have been approached and it has been confirmed that the land is not for sale. The site cannot be considered a suitable or available sequentially preferable alternative.
Deliverability / Conclusion	The site is not suitable – being too small to accommodate the proposed development. The site is committed to an existing land use – public car parking. The land is not available accordingly. The site owners have confirmed that it is not for sale.

Interim Summary

- 1.25. In light of the above findings, the table below summarises the key reasons why neither of the alternative sites are considered to be suitable, available or deliverable.

Site / Property Address	Overall Conclusion
Water Street (Former School)	Whilst potentially large enough to accommodate the proposed use and development, the site is neither suitable (by virtue of access), available (as a result of being committed to an alternative scheme), and is not therefore deliverable.
Water Street (Council Owned Car Park)	The site is too small, and in any event, its development for the proposed use and scheme (even if possible), would result in the loss of an existing public car park facility that functions with and for the local centre. The site has been confirmed to not be available for sale, and therefore redevelopment. The site is therefore not deliverable for a range of reasons.

Summary & Conclusion

- 1.26. The assessment demonstrates that no sites or premises within, or in close proximity to, the Gwaun-Cae-Gurwen Local Centre are suitable, available, and / or deliverable for the proposed development. Any identified vacant units within and in the vicinity of the centre are substantially below the floorspace required to deliver the proposed retail offer, whilst the potentially sequentially preferable (edge of centre) sites are either unavailable or unsuitable for the detailed reasons outlined above.
- 1.27. Having regard to the requirements of the sequential approach, it is therefore concluded that there are no sequentially preferable sites within Gwaun-Cae-Gurwen capable of accommodating the proposed development. The application site represents the most appropriate and available location to meet the identified retail need - it being in close proximity to the centre in any event, and accessible to and from it by a range and choice of sustainable means of transport. The site is also previously developed land, in pressing need of regeneration as a result of the building that occupies the site.
- 1.28. For these reasons the proposal is considered to comply with the sequential test and the objectives of national and local planning policy.