

Brecon Beacons Local Development Plan 2007 – 2022

Hearing Session 4: Economic Wellbeing

Matters & Issues Agenda

1. Welcome and Introduction

2. Procedural Matters

3. Employment and Housing Alignment

- a) It is recognised in the evidence¹ that the LDP housing requirement of 1,996 over the Plan period will not result in a job-housing alignment and will lead to the loss of 1,430 people of working age population. Will this undermine delivery of the National Park Management Plan Vision and LDP strategy for employment generation which is to enhance the socio-economic wellbeing of its communities?

4. Employment Land Provision

- a) The Employment Land Review (ELR) identifies that 1.5 ha of land for B Class employment use is required to 2022 but makes clear that this is a minimum requirement. The LDP allocates 2.06 ha of employment land. Will this allow sufficient flexibility for a range and choice of sites to meet the needs of current and potential future employers in the National Park?
- b) Given that the ELR findings suggest that many of the vacant premises are not best suited to meet the needs of current and potential future occupiers, will the allocation of 2.06 ha of employment land be sufficient to meet these needs?
- c) The ELR indicates that smaller-scale start-up employment units within property hot spots such as Brecon and Hay-on-Wye are required. Will the strategy deliver sufficient opportunities to foster start-up companies in these areas?
- d) A number of allocated employment sites are former UDP allocations. What evidence is there that these are likely to come forward during the Plan period?
- e) Are the LDP policies sufficiently flexible to allow for B use class employment development on windfall sites?
- f) Have opportunities for utilising brownfield land, redundant sites and buildings been fully evaluated? Should the LDP evaluate the potential of the former Talgarth hospital site and Cwrt-y-Gollen site as a mixed-use/employment site?

¹ NLP Assessment of Future Need for Housing report dated July 2012

5. Waste Strategy

- a) Does the LDP adequately demonstrate that there are potential suitable sites available for a local waste facility if the need arises?
- b) Of the 10 sites examined in the ELR, 4 were considered to warrant further investigation should the need for a local waste facility arise. Have these sites been examined further?
- c) Is Policy 42 sufficiently flexible in terms of improving cross border consistency?

6. Farm Diversification and rural economy activities

- a) The ELR recommends that agriculture and forestry activities are promoted as key economic sectors. Is this adequately reflected in the LDP?
- b) Is there sufficient encouragement for farm diversification particularly that which is interconnected with agriculture and adds value to farming activities, as recommended in the ELR?
- c) Should specific reference be made to supporting appropriate food-based businesses which are an important part of the rural economy?

7. Retail

- a) What evidence is there that consideration was given to whether there is a need for additional provision for retail and the allocation of additional retail sites?
- b) Are the retail policies sufficiently flexible to allow for additional retail provision in retail centres should the need arise?
- c) A retail centre has not been identified for Sennybridge which has been re-classified as a Key (Level 2) Settlement but it has not been identified in Policy 24. Should either Policy 24 be amended to identify a retail centre for Sennybridge or Policy 26 amended to include Level 2 settlements?
- d) Are the retail policies sufficiently robust to maintain and enhance the vitality and viability of town centres – particularly in areas such as Hay-on-Wye where shop variety attracts visitors?
- e) Does the proposed hierarchy of the Talgarth retail centre reflect its functional and historic use? Are the retail premises on High Street included in the retail centre?
- f) Should specific reference be made to garden centres and market gardens in Policy 26 Neighbourhood, Village and Rural Shops?

8. Tourism

- a) The ELR suggests that the value of tourism could be enhanced through reducing seasonality and increasing levels of expenditure by visitors. Do the LDP policies assist in promoting off-peak tourism proposals?

9. Monitoring Framework

- a) Are there robust monitoring and review mechanisms in place that will enable the Plan to respond to changing circumstances?

6. Any Other Matters

- a) Any matters arising in relation to PPW, Edition 5²

DRAFT

² Planning Policy Wales, Edition 5, November 2012

Appendix 1: Miscellaneous Policy Matters

Employment

AFC-7-13

- Is there sufficient justification for the allocation of land adjoining Defynnog Road as a mixed use site? The ELR suggests that it is 'poor' in relation to its suitability for employment use. Furthermore, there is no indication of the proportion of uses expected to be delivered on the site. Appendix 2 of the ELR says that the site is not suitable for housing. This casts serious doubt whether the site is likely to be developed for mixed-use.

AFC-7-16 and AFC-7-17

- Is there unnecessary duplication between Policy 17 and Policy 19? Could these policies be combined within a single policy?

AFC-7-21 Policy 18 'Protection of Employment Sites and Buildings

- Criterion c) of the policy requires applicants to demonstrate that the potential for continued use of the site or premises for employment use has been fully considered through the continued marketing of the site for a continuous period of at least 12 months. Is this too short in marginal areas and would 2 years may be more appropriate as suggested by The Countryside Council for Wales (CCW)?
- Should Policy 18 include a requirement as to when the marketing will need to have been undertaken, for example, 12 months immediately prior to the submission of the application?
- Should an indication of how proposals would be considered under the 'cascade approach' be provided? Does the policy provide a sufficiently clear indication of what types of development are likely to be considered acceptable?

Agriculture and Forestry

7.5.1 Housing for Essential Rural Enterprise Needs

- Should this section be in the housing chapter?
- Does this section repeat national planning policy? Would cross-referencing to PPW Technical Advice Note (TAN) 6 suffice?
- Is it sufficiently clear that rural enterprise dwellings are exempt from the affordable housing requirement set out in Policy 13?
- Paragraph 7.5.1.2 refers to "Other Planning Requirements Test" which should be cross-referenced to TAN 6.

Retail

- The LDP refers to 'Retail Centre' but the Proposals Map refers to 'Retail Core' – should these be aligned?

SP13 Retail Strategy

- The policy refers to primary retail cores in criterion 1 and to retail centres in criterion 2 which is confusing.
- Policy 24 criterion a) refers to proposals being permitted for changes of use including to a "sui generis use that would normally be found in a Retail Centre" and b) refers to proposals being permitted for new developments including for a "sui generis use normally found in that Retail Centre." This needs further clarification. "Sui Generis" could include theatres, nightclubs, retail warehouse clubs, amusement arcades and motor car showrooms. Would the policy have unintended consequences?
- Policy 24 criterion c) ii) refers to a marketing exercise. Should more detail be provided?

Policy 26A Change of Use of Public Houses

- A new policy 26A is proposed through FC 7-P-24-b. Paragraph 7.7.6.4.b makes clear that changes of use are only permitted within Class A3 to A1 where there is a display window at ground floor level. Should this be reflected in the Policy wording?
- Should the reasoned justification include reference to supporting community-run pubs?

Tourism

- Is there a conflict between paragraph 7.8.4.1 which says that "the provision of new accommodation which is not capable of occupation during Winter is not compatible with the objective of increasing the supply of accommodation which is available for accommodation throughout the season" with paragraph 7.8.6.5 which says that restrictions for touring caravans will be in place from 31 October to 1 March?