

ashburne

FAO: Ms Barbara Prosser
LDP Programme Officer
CCBC
Ty Penallta
Tredomen
Ystrad Mynach

31 3 2010

Dear Ms Prosser,

Representor No: 3732

Please find attached my written submission regarding Ystrad Mynach Centre for consideration at the LDP hearing scheduled for 18 5 2010. Please take this in conjunction with my original letter of 28th October 2008.

Yours sincerely,



Gerard Lewis

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Examination of Caerphilly Local Development Plan. Additional Information. March 2010.

Objections to proposals made in the Development Plan submitted by the Officers of the Caerphilly County Borough Council are made in conjunction with the letter dated the 29th October 2008 submitted by myself Mr. Gerard Lewis [Local Business man] on the following two grounds.

- a. Proposals for the G.P.Surgery which impacts on the available town centre car parking and hence negatively affects trade in the town centre.
- b. Proposals to take the site presently occupied by Tesco into the Retail Area of Ystrad Mynach.
This item is referred to in the penultimate paragraph of the aforementioned letter .i.e. *'Any proposal which might have a further detrimental effect on our ability to trade profitably can only be objected to most strongly '.*

Objection a.

Parking for shoppers in Ystrad Mynach Town Centre has been a major problem for a considerable number of years. Ashburne has been in business since 1991 and the lack of parking facilities has been a source of complaint for our customers continuously.

Over the years several representations have been made to both the Local Authority and the Police and we have always been assured that they are aware of the difficulties. Current parking restrictions are not enforced leading to all day parking in restricted zones [30mins].The bus stop adjacent to the Bryn Seion Centre causes traffic congestion and requires serious attention. The problems associated with car parking together with point b. shown above combine to make the previously Established Retail Centre of Ystrad Mynach an increasingly difficult place to trade effectively and profitably.

Objection B.

The site presently occupied by Tesco cannot be regarded as part of the Retail Area of Ystrad Mynach.

To define the site within the Retail Area of Ystrad Mynach is to assume that it is part of and is complementary to the Town Centre .

It is now beyond question that the converse is true.

1.0

When Tesco applied to have the site it now occupies changed from its then L.D.P. designation as a Green Wedge to a Retail Site the following statements were made in a Report to the Development Services Committee dated the 18:10:1995 .

The County Planning Officer commented that '*the site is located outside the defined settlement limits and also forms part of an area allocated as Green Wedge.*

He also states that '*the proposed site therefore lies in the countryside and 'at that time' should be considered as an 'Edge of Centre' Site.*

The Gwent County Council Planning Officer when objecting to the proposal also stated that '*the development would lead to the loss of an important Green Wedge and thereby contribute to undesirable urban sprawl in the area*'. He also stated that for '*any spin off benefits to other traders ,evidence of this is somewhat inconclusive.*'

Note.

With regard to site designation current Planning Guidance [Wales] Technical Advice Note No.4 indicates an Edge of Centre site is designated as follows:-

Edge-of-centre: a location within **easy walking** distance of the centre normally not more than **200-300** metres from existing town centre shops, **providing parking facilities that serve the centre as well as the store, thus enabling one trip to serve several purposes. Lesser distances may be appropriate for smaller town centres** and local circumstances such as **topography** will also determine appropriate distances.

Fact.

The nearest car parking bay on the Tesco Site is located a minimum of .370m from the nearest building in the Town Centre which is a fast food take away and much further from the Main Retail Area . The first 100m to a pedestrian pavement has a steep upward gradient.

The site designation therefore is at best 'Out of Town' as the distance to the town centre is closer to 500 metres.

Appendix A shows a copy of the Ordnance Survey Plan for the Area which indicates quite clearly that Tesco occupies a site that was on a Green Wedge and is in a **pedestrian** area of Ystrad Mynach not the main Retail Area.

2.0

In defining the Site within the Retail Area the Planning Authority has conveniently eliminated the need to take a **Sequential** approach to any subsequent applications made by the present or any subsequent occupant . In determining any application for usage of the site the Local Authority Planning Officers **should** take into account the following Legislation:-

MIPPS. 02/2005. Retailing and Town Centres. Paragraph 10.3.

10.3. When determining a planning application for Retail or other uses best located in a Town Centre, including 'extensions' local Planning Authorities should take into account.:

a. compatibility with any community.

b. The sequential approach to site selection. i.e. If there is a better location for any proposal. Recent experience has indicated that designating the site in the Retail Area [even before it has been confirmed] meant that this approach was totally ignored by the Local Planning Authority when Tesco wished to carry out a much larger development on the site.

c. The impact on existing centres . Again conveniently overlooked.

The following Planning Guidance must also be taken into consideration where a site is considered to be Out of Centre.

MIPPS.02/2005. Paragraph 10.3.8

Out of Centre food supermarkets should not be allowed if their provision is likely to lead to the loss of general food retailing in the centre of smaller towns.

As shown in Appendix B Somerfield has left the Town Centre and the present Occupant of the unit vacated is having extreme difficulty in competing with Tesco.

The Retail Impact Analysis included in the original 1995 Planning Application concluded:-

' that there will be no material adverse effect on any retail centre ,indeed it is evident that the proposal will be of significant benefit to Ystrad Mynach as a whole by encouraging people to shop in and use the services of the town'.

As with many aspects of assumptions made by Planning Officers both with the original approval for the use of the Green Wedge as a Retail Site and recent Planning Applications the conclusions reached were to say the least flawed.

Since the usage of the Green Wedge was changed to accommodate Tesco the buying power of the multi national organisation has had a totally devastating and detrimental effect on the trading and profitability of the main Retail Area of Ystrad Mynach.

The businesses as shown in the **appendix B** have ceased to trade.

The number of vacant Retail Units in the town centre, most of which have been empty for some time are shown on photographs in **appendix C**.

Comment.

This will not encourage investment and should the site in question be given Ystrad Mynach Retail Area status will be the final nail in the coffin of Ystrad Mynach Town Centre.

The presence of Tesco on the site it occupies at Ystrad Mynach has most certainly affected the 'vitality and viability' of the Town Centre.

The current approach by Jane Davidson the Assembly minister for the Environment is indicated in a Plenary Document recently circulated.

' It is interesting for Members to know that when faced with applications for new retail developments, local planning authorities must consider fully the need, quantitative and qualitative, of such a development, including the effect on a town centre. When considering new sites for retailing, local planning authorities are expected to follow a sequential approach, which means that the first preference is given to town centres, followed by district and local centres, and only then to out-of-centre sites, in locations accessible by a choice of means of transport. We specifically say that out-of-centre supermarkets should not be allowed if their provision is likely to lead to the loss of general food retailing in the centre of small towns. That is critical, particularly for those members of the population who find it more difficult to access alternatives.

Nick Ramsay : I am very pleased to hear what you have just said. Do you agree that, although we all want to protect small community shops, too often, the supermarket/small shop argument is seen as a polarised one? In fact, the two can be complementary, but I am pleased that you just said that planners should consider very carefully the impact of out-of-town supermarkets on the town centre. In fact, it is better to have a planning scheme that allows for as much retail as possible to be in the centre of a town, ensuring that large out-of-town developments do not detract from that.

CONCLUSIONS.

The proposal to include the site occupied at present by Tesco into the Retail Area of Ystrad Mynach flies in the face of the above MIPPS Planning advice and the Planning Technical Advice Notes .

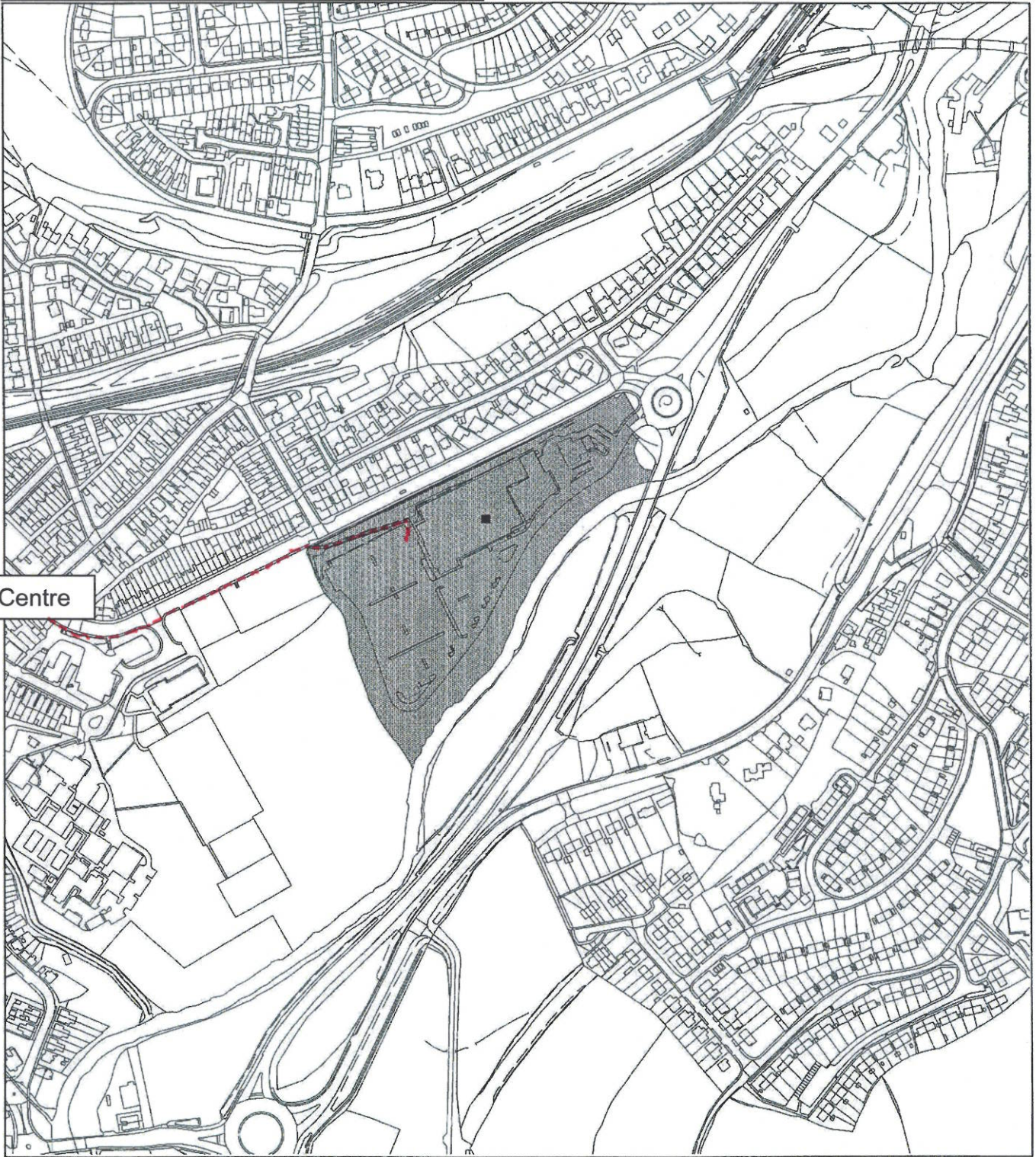
Now that the site is in being it must be classified as **Out of Town thereby requiring a sequential approach to be applied to its usage by the Local Authority Planning Officers and an even handed approach to Planning Legislation and Advice issued by the National Assembly.**

For Illustrative Purposes Only

APPENDIX A

Site occupied by Tesco shown shaded

Town Centre



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Atgynhychwyd o fapiad yr Arolwg Ordnans gyda chaniatod rheolwr Llyfrfa ei Mawrhydi hawlfraint y Goron. Mae atgynhyrchu heb awdurdod yn torri hawlfraint y Goron. Gall hyn arwain at erlyniad neu achos sifil. Cyngor Bwrdeistref Sirol Caerffili, 100023572, 2007.

Organisation	Caerphilly County Borough Council
Department	Planning Division
Scale	1:5000
Date	22 September 2009
SLA Number	100025372

APPENDIX B

RETAIL PREMISES CLOSURES YSTRAD MYNACH

Approximate closure date

1995-2010

Somerfield	2003	
Waters Butchers	2003	
Cottage Bakery	2005	
Jones Fruiterer		
Organs Fruiterer		
Costcutter	2003	
Fruiterer Penallta Road	2006	
Café Penallta Road	2006	
Matthews Builders Merchant		1998
Changes (clothes)	1997	
Davies (clothes)		
Edith Bell (clothes)		
Annettes (clothes)		
Wool Shop (Penallta Road)		1995
Rocking Horse (children's clothes)		
Cherry Tree (children's clothes)		
Newsagent Penallta Road	1998	
Photo Development (Bedwlwyn Road and Penallta Road) Foto Stop and PhotoMe		
1998		
Homes (Estate Agent)		2003
Motorworld	2008	
Richard Lewis (Furnishers)	2006	
Meryl Rossi (Florist)		2009
Job Centre	2004	

1990-1995

Cooperative Store and Bank
Bracchi's Café
Phillips Electrical
Redifusion
Perfect Settings (upholsterers)
Cobblers
Post Office Sorting Office

NOTE.

Two further premises are at present considering closure.

Replacements for the majority of the above have been in the form of FAST FOOD TAKEAWAYS, CHARITY SHOPS or REMAIN EMPTY and BOARDED UP.

APPENDIX C



EXISTING Vacant Town Centre Properties