

POWYS EMPLOYMENT NEEDS ASSESSMENT

Position Statement

JANUARY 2016

CONTENTS

1	INTRODUCTION	1
2	REGIONAL EVIDENCE.....	2
3	IMPROVING LOCAL ECONOMIC CONTEXT	4
4	DISTRIBUTION OF ALLOCATIONS.....	7
5	NEWTOWN SITE INVENTORY	9
6	IMPORTANCE OF WELSH LANGUAGE STRONGHOLDS	16
7	SITE DELIVERABILITY.....	19
8	SUMMARY	21

1 Introduction

- 1.1.1 The Powys Employment Needs Assessment (hereafter referred to as ‘the Assessment’) was produced in October 2012. The Assessment comprises a Core Report and three Technical Reports relating to the socio-economic context; a property market overview and supply analysis; and a demand analysis respectively.
- 1.1.2 An initial Deposit Draft LDP was published for public consultation in 2014. The representation received from Welsh Government advised the Council that further supporting evidence should be available to support the LDP; as a result an Addendum to the original Assessment was prepared in early 2015 (referred to hereafter as ‘the 2015 Addendum’).
- 1.1.3 A revised Deposit Draft LDP was issued for public consultation in the summer of 2015. In recognition of further comments received on the revised Deposit Draft by Welsh Government, together with the provision of new policy guidance in relation to the economy in September 2015, and increasing levels of economic activity apparent within Powys, it was considered timely to produce a new Position Statement in relation to the original Assessment.
- 1.1.4 This report is structured as follows:
- Section 2** sets out the latest policy context and assesses the regional evidence relating to the ‘larger than local’ approach described in TAN23;
 - Section 3** summarises the most recent changes within the Powys economy, including evidence of economic activity;
 - Section 4** provides a review of the distribution of employment site allocations;
 - Section 5** contains an inventory of employment land sites within the Newtown area, considering allocated sites, potential sites and existing stock;
 - Section 6** considers the impact of site allocations on Welsh Language strongholds;
 - Section 7** explores further issues relating to viability and site deliverability; and
 - Section 8** summarises the main findings of the Position Statement.

2 Regional Evidence

- 2.1.1 The 2015 Addendum referenced the new TAN23 'Economic Development' which was published in February 2014. In relation to employment land provision, TAN23 notes that assessments should allow for 'flexibility, competition and choice' and that whilst land provision targets may be higher than anticipated demand, to allow for the chance that the assessments are too low, persistent oversupply of employment land should be avoided.
- 2.1.2 TAN23 also refers to 'larger than local' planning, stating that 'market forces do not respect local authority boundaries' and that the planning system should steer development to the most efficient and sustainable locations. The document notes that it is for individual local authorities to identify the most appropriate strategic affiliation and groupings and functional economic areas and to consider the evidence base for each.
- 2.1.3 In September 2015, a new Practice Guidance note was published by Welsh Government entitled 'Building an Economic Development Evidence Base to Support a Local Development Plan' and provides a methodology to help LPAs produce robust evidence bases to underpin sound plans and development management decisions. The Guidance builds on the 'larger than local' theme outlined in TAN23, setting out information about the identification of strategic level policies and sites for inclusion in LPA development plans.
- 2.1.4 How the 'larger than local' theme relates to Powys, the original Assessment and 2015 Addendum, is considered in further detail here. Firstly, it should be noted that in most other locations in Wales, LPAs cover fairly small geographies and there is therefore a clear rationale for joint working given commonality of issues and functional linkages. The case in Powys is far less clear cut, primarily because of the scale of the County.
- 2.1.5 A review of travel to work data (Census 2011) identifies that overall, Powys is very self-contained, with 87% of all workers also living in the area (this figure includes those that work from home and those that have no fixed place of work, but who live in Powys). The original Assessment divided Powys into four geographical sub-areas for the purposes of description and understanding of spatial implications (rather than fixed zones with clear boundaries). The four broad sub-areas are Machynlleth; Severn Valley and North; Central; and Ystradgynlais. Looking at these sub-areas individually in terms of levels of self-containment it can be seen that:
- Both Central and the Severn Valley and North sub-areas have very high levels of self-containment (above 90%). Labour movement here is primarily from over the English border into these sub-areas;
 - The Machynlleth sub-area has a self-containment level of around 80% (also relatively high), with flows into the sub-area seen from Ceredigion and Gwynedd; and
 - The Ystradgynlais sub-area exhibits the lowest levels of self-containment of the four, with a level of around 60%. Here, the major flow of workers is from the Neath Port Talbot urban area (contributing approximately 25% of workers in the sub-area and c.1% of Powys workers in total), with other flows from Swansea and Carmarthenshire.
- 2.1.6 Whilst Ystradgynlais is the least self-contained sub-area, it is also small in terms of total employment, providing about 4% of all Powys based employment. Machynlleth contributes a similar proportion. Therefore the bulk of employment (71%) is located within the central and Severn Valley/North sub-areas, which are also the most self-contained.
- 2.1.7 The statistics in the preceding paragraphs refer to specific sub-areas within Powys; however when considering the County as a whole, there does not appear to be a strong

case for major cross-border working – either between Powys and adjoining Welsh Local Planning Authority areas or between Powys and England. It is appropriate that linkages from individual zones are recognised and co-operation undertaken where necessary, however in absolute terms the linkages would appear to be relatively small (in absolute terms, the greatest flow into Powys is from Shropshire and this only constitutes some 3% of workers in Powys as a whole). The Practice Guidance refers to the need for 'larger than local' areas to be considered where 'practicable'; in the Powys context, due to the scale of the County and extent of existing economic flows and limited linkages outside all of the market sub-areas, it is not considered that this approach is necessary.

3 Improving Local Economic Context

- 3.1.1 The 2015 Addendum highlighted that, in the intervening years since the original Assessment was produced in 2012, the national UK economy has shown signs of economic recovery. For Powys, high levels of participation as recorded by economic activity and employment rates have been exhibited. For example, 80.5% of residents of working age in Powys were economically active during the period July 2014 to June 2015, compared to a figure of 74.8% for Wales as a whole (Nomisweb 2015); similarly, jobs density in Powys (i.e. the ratio of total jobs to working age population) was 0.86, compared to 0.72 for Wales as a whole (Nomisweb 2013). However, the value generated has remained relatively low, with high levels of self-employment and part-time working and low earnings compared to the national average. The 2015 Addendum concluded that, overall, labour market indicators in Powys are moving in a positive direction as the economy recovers.
- 3.1.2 There is currently evidence of strong demand from businesses, exhibited by:
- i) the level of enquiries processed in relation to specific sites and premises;
 - ii) planning applications submitted in relation to undeveloped plots; and
 - iii) surveys/research undertaken (for example a survey undertaken of its members by the Mid Wales Manufacturing Group in early 2015 which identified that 47% of respondents were looking for additional space in the next two years and 41% of respondents identifying that they are looking for more than 5,000 sq.ft. of industrial space).
- 3.1.3 Table 3-1 below provides a summary of recent enquiries and planning applications for specific sites in Powys.

Table 3-1 Summary of Recent Enquiries and Applications

Site	Comments
Broadaxe Business Park, Presteigne	Welsh Government has been granted conditional consent for a planning application (P/2015/0554) for the extension of infrastructure to service the site, in response to four strong enquiries from local businesses requiring plots of land to expand.
Broadaxe Business Park, Presteigne	Conditional consent granted in 2014 for two live/work units and a single storey workshop.
Broadaxe Business Park, Presteigne	Conditional consent granted in 2013 for the erection of a retail and warehouse storage building and associated yard.
Buttington Cross Enterprise Park, Welshpool	Two undeveloped plots at present – planning consent granted in 2015 to Penycoed Construction for the erection of a factory building and associated office (P/2014/1141). Planning application submitted by Adcock Associates in September 2015 (subsequently withdrawn) for the construction of a petrol filling station and associated works.
Buttington Cross Enterprise Park, Welshpool	Conditional consent granted in 2015 for the erection of a storage building in association with Wipack UK Ltd.
Buttington Cross Enterprise Park, Welshpool	Conditional consent granted in 2014 for the extension to an existing factory at Unit 5.

Powys Employment Needs Assessment

Buttington Quarry	Existing industrial employment site of c.5ha with an additional 6-7ha potentially available within the 'worked out' quarry void, suitable for B1, B2 and B8 use classes. The existing site is home to the quarry operators and a distribution company at present. Interest has recently been expressed in locating here from a haulage company (lease due to be completed shortly).
Offa's Dyke Business Park, Welshpool	Conditional consent granted in 2015 for the erection of a new manufacturing space (P/2015/0748).
Offa's Dyke Business Park, Welshpool	Extension to factory granted in 2015 (P/2015/0127).
Offa's Dyke Business Park	Current enquiries being processed from three businesses may result in 11.5 acres (4.65ha) being developed.
Abermule, Newtown	Powys County Council regeneration section is currently working in partnership with Welsh Government to provide units at this site.
Parc Hafren, Llanidloes	Consent granted 2012 (P/2012/0611) and 2013 (P/2013/0729) for highways salt dome and ancillary buildings and landscaping resulting in 0.5ha currently being developed.
Wyeside Enterprise Park, Builth Wells	Consent granted 2013 (P/2013/0703) for a transport depot and workshop. Consent granted 2013 (P/2013/0334) for extension to an existing business unit to increase production and storage.
Churchstoke	There is potential interest on this site (approximately half of the allocated site) from a local business looking to expand its operations (the business is currently growing at a rate of approximately 15% per year).
Gypsy Castle Lane, Hay-on-Wye	Mixed use site. Potential development of the site may be focused around incorporating a higher housing element within the existing site boundary.
Three Cocks, Hay-on-Wye	Mixed use site. The site includes the committed areas of existing employment/retail permissions on the Griffiths Trailers site and the old Laura Ashley site (both permissions have been implemented). Pre-application discussion taken place with regard to the potential for additional land to the right of the entrance of Hay Road and to the rear of the 'Laura Ashley' permission. The promoter contends this would provide better buffering of the site rear boundary and assist delivery of employment and housing growth on the site, with the site being developed in phases early in the Plan period.

3.1.3 This section has identified that there is evidence of recovery in the Powys economy exhibited by increasing levels of demand. The findings set out in Table 3-1 illustrate the level of interest across a range of sites of various sizes within the County over the last

twelve months. The findings support the conclusions of the Employment Needs Assessment (2012) and associated Addendum, by providing further evidence that a broad range of sites in terms of sizes and locations is clearly needed within Powys to accommodate this increasing demand. In terms of the size and typology of sites required across the B1, B2 and B8 Use Classes, it is clearly prudent to provide a mixture of appropriately sized sites and premises in locations across the County during the Plan period.

4 Distribution of Allocations

4.1.1 Policy E1 of the revised Deposit Draft LDP (2015) relates to 'Employment Proposals on Allocated Employment Sites' and identifies that 49ha of land has been allocated for employment development within the County (B1, B2 and B8 uses). This falls within the 40-56ha range identified within the original Employment Needs Assessment. In addition, Policy E3 allows for employment led mixed-use developments at appropriate identified sites.

4.1.2 Sites originally allocated within the Deposit Draft LDP (2015) are listed in Table 4-1 below.

Table 4-1 Allocated Employment Sites in the Deposit Draft LDP (2015)

Site Name	Location	Size of Development Area (ha)	Category
<u>Ystradgynlais</u>			
Woodlands Business Park	Ystradgynlais	2.31	High Quality
		2.31 ha.	
<u>Central Powys</u>			
Wyeside Enterprise Park	Builth Wells	1.2	High Quality
Gypsy Castle Lane	Hay-on-Wye	2.4	Mixed Use
Heart of Wales Business Park	Llandrindod Wells	4.3	Prestige
Broadaxe Business Park	Presteigne	2.4	Local
Brynberth Enterprise Park	Rhayader	3.7	Local
Land adj. Gwernyfed Avenue	Three Cocks	3.4	Mixed Use
		17.4 ha.	
<u>Severn Valley & North</u>			
Great Oaks Business Park	Llanidloes	0.4	High Quality
Parc Hafren	Llanidloes	1.68	Local
Llanidloes Road	Newtown	2	High Quality
St. Giles Golf Course	Newtown	4	Mixed Use
Abermule Business Park	Abermule	2.6	High Quality
Churchstoke	Churchstoke	1.54	Local
Buttington Cross Enterprise Park	Welshpool	1.5	Prestige
Buttington Quarry	Trewern	6	Local
Offa's Dyke Business Park	Welshpool	7.3	Prestige
Four Crosses	Four Crosses	0.75	Local
		27.77 ha.	
<u>Machynlleth</u>			

Treowain Enterprise Park	Machynlleth	1.3	High Quality
		1.3 ha.	
Total		48.78 ha.	

- 4.1.3 Potential deliverability issues have been raised with regard to two of the sites in the Newtown area, namely the Llanidloes Road site and St. Giles Golf Course. With regard to the former, which is classified as a high quality site, deliverability issues are associated with the proportion of the total area of the site identified on the proposals maps (4.14ha) which is located within a C2 floodzone. This issue resulted in the identifiable developable area being reduced to that indicated in Table 4-1 above (2 ha). The site promoters have agreed the necessity for a detailed topographical site survey, accompanied by a Flood Consequences Assessment in order to determine how much of the site beyond the currently identified developable area can be developed. Once produced this shall provide material evidence to support the ongoing allocation of the site and its phased development.
- 4.1.4 The St. Giles Golf Course was allocated in the Powys UDP as a premium employment site; the Deposit Draft LDP identifies its suitability as a mixed use site. The golf course has been for sale; however whilst the site does not present constraints in terms of location factors (for example access or flooding), the current land use and necessary investment required to convert the golf course into suitable employment land may restrict its potential from a market viability perspective. Whilst there has been some recent interest in the site, this has been for a supermarket rather than employment development. Consultations with the landowners during the preparation of this Position Statement indicate that the site will not come forward for employment purposes during the lifetime of the Plan, and as a consequence it will be de-allocated.
- 4.1.5 Other (non-employment) developments granted consent have impacted upon the areas of developable land available for employment at other allocated sites (e.g. Churchstoke), and in support of this Position Statement, the Planning Authority has re-assessed and re-measured the available developable land at all allocated sites identified in the Deposit Draft LDP (2015). The updated version of Table 4.1 above is presented in the update to the Employment and Economic Development Topic Paper (January 2016).
- 4.1.6 The Powys Employment Needs Assessment identified three prestige, strategic employment sites; Heart of Wales at Llandrindod Wells, Buttington Cross and Offa's Dyke in Welshpool are geared to providing long term and high quality capacity beyond the current Plan period.
- 4.1.7 The combination of re-measuring and deliverability issues associated with the Golf Course site is such that the overall quantity of employment land to be allocated within the LDP will be reduced to **45ha**. Whilst this still falls within the range identified as appropriate within the original Assessment (and which is supported by the 2015 Addendum), there is a potential shortfall of sites within the Newtown area, which is identified as a primary key settlement in the Wales Spatial Plan and a Town in the Draft Deposit LDP spatial strategy. This is explored further in the following section.

5 Newtown Site Inventory

5.1.1 In order to identify whether or not the potential shortfall of sites in the Newtown area is likely to be significant, a survey of other employment allocations, candidate sites, undeveloped areas within the development boundary and existing employment stock has been undertaken within the Newtown area. In relation to existing employment stock, the survey has identified where there may currently be vacant units. Other factors that need to be taken into consideration include the fact that the Newtown Bypass was given approval by Transport Minister Edwina Hart in October 2015, with a potential completion date of 2018. The route of the bypass runs to the south of Newtown and south of the Mochdre Industrial Estate. The findings of the Newtown survey are described below. An inventory of employment land and sites within the Newtown area is provided in Tables 5-2 to 5-4 below, (this follows the broad methodology set out in the recent Practice Guidance (September 2015)). The tables set out information in relation to:

- Allocated sites** area of site and/or floorspace; the current position regarding take-up of units; information relating to current planning applications or recent enquiries from developers.
- Other sites** these relate to proposed candidate sites and alternative sites within the Newtown area. Information relates to site area, and known issues/constraints.
- Other opportunities** these relate both to existing employment stock within the Newtown area that may be vacant or under-used as well as to areas of potentially developable land (white land) within the Newtown settlement boundary.

Table 5-2 Allocated Sites in the Newtown Area

Allocated Sites	Area (ha)	Comments
Abermule Business Park	2.6	<p>The site is within close proximity to Newtown and major road links. Site preparation and infrastructure works are complete.</p> <p>Allocated in the deposit Draft LDP for High Quality employment use. Discussions with WG have identified that, in order to provide more flexibility for the site in terms of its end-use, the site can be re-defined as 'High Quality / Local', provided that the quality of the local use is sufficiently high not to detract from the site's environment.</p> <p>In addition, the Regeneration Team at Powys County Council have been working in partnership with WG to provide medium sized units on the site.</p>

Table 5-3 Other Proposed Employment Sites from the Candidate Site Register in the Newtown Area

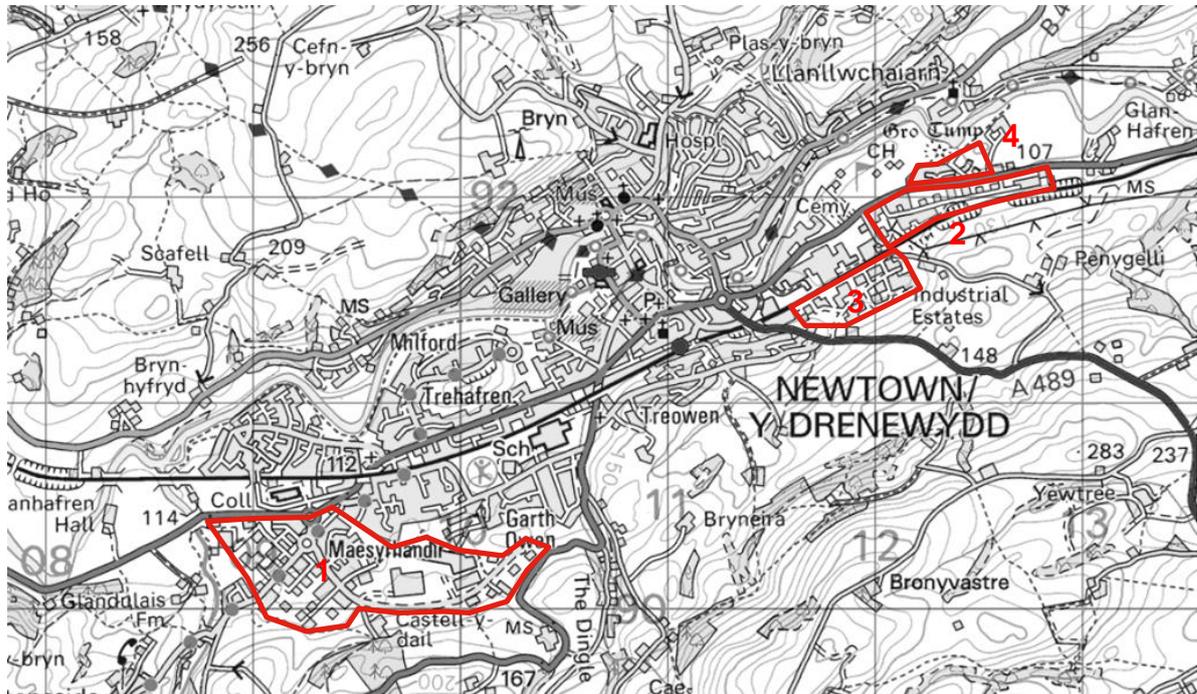
Proposed Sites (candidate site no.)	Area (ha) or Floorspace (m ²)	Current Position
(1133) – Employment – Mochdre	0.83	Comments from the Site Status Report identify that the land lies outside but adjoining the current UDP development boundary, adjacent to existing industrial premises on the strategically important Mochdre Industrial Estate. The site is also located on the protected route of the proposed Newtown by-pass and as such (given the recent approval for this project), it is not considered suitable for allocation.
(586) – Mixed use (residential / employment / recreation / leisure	23.01	This is a significant area of agricultural land and woodland adjoining the existing UDP settlement boundary to the south of Newtown. For example the majority of the northern part of the site lies on the protected route of the proposed Newtown by-pass; the southern part of the site would be considered open countryside, and is also significantly affected by a nationally significant high pressure gas pipeline. The Site Status Report considers that whilst there may be smaller developable areas of the proposed site adjoining the existing employment development and therefore suitable for employment use and that the acceptability of development here may be determined through the planning application process. The site is therefore not considered suitable for allocation.
(249) – Residential / employment	5.36	The site is considered to be in open countryside, in addition to which there would be significant highways access constraints to the site's development. The site lies on the protected route of the by-pass, the development of which would leave little if any developable land. As such the site is not considered suitable for allocation.
(589) – Residential / employment	3.35	The site comprises two parcels of relatively flat pasture land on the outskirts of Newtown. The south-western parcel of land (589A) is not considered suitable for allocation within the Site Status Report by virtue of constraints relating to access and flooding. The parcel of land to the north and east of Glandulais Drive (589-B) is similarly constrained by access issues (the

		<p>Glandulais Drive junction is considered to be sub-standard) and part of the site is located within the floodplain.</p> <p>The Site Status Report does not consider the site as a whole to be suitable for allocation, however, the site lies within the existing settlement boundary and as such, its acceptability for development may be determined through the planning application process.</p>
(660) – Mixed use	2	<p>The site lies to the west of Newtown but is not adjacent to the settlement boundary. The site has previously been allocated for residential development in the Deposit Version Montgomeryshire Local Plan but was omitted in the modifications to that document.</p> <p>The Site Status Report identified issues and constraints associated with the site including its visibility on the approach to Newtown from the west, and lack of adequate highways access (although both issues may be addressed with the construction of the Newtown bypass).</p> <p>The Site Status Report noted that the acceptability of this site for allocation would be subject to confirmation of by-pass proposals and further discussion with stakeholders, but other, more suitable, sites were available to meet settlement requirements during the Plan period.</p>
(903) – Residential / employment / mixed use	2.72	<p>Existing primary school site within the settlement boundary adjoining existing residential area. Acceptability of the site for development may be determined through the planning application process. The site is therefore not considered suitable for allocation.</p>

5.1.2 Candidate site 660 was subject of a Representation during the consultation phase of the Draft Deposit LDP in July 2015 and was re-submitted as an Alternative Site. However, the detached location of the site away from the settlement boundary and the issues originally identified in the Site Status Report in respect to this site remain and in response to the representation the site has not been recommended for allocation within the LDP.

5.1.3 There are four existing industrial estates / business parks located within Newtown, namely the Mochdre Industrial Estate, Dyffryn Enterprise Park, Vastre Industrial Estate and the St Giles Business Park (Figure 1). Current vacancy rates at each of these locations is summarised in Table 5-4.

Figure 5-1 Location of Existing Industrial Estates / Business Parks in Newtown



1) Mochdre Industrial Estate 2) Dyffryn Enterprise Park 3) Vastre Industrial Estate 4) St Giles Business Park
 Topography © Crown Copyright and Database Rights 2015 Ordnance Survey 100025371

Table 5-4 Inventory of Existing Stock in the Newtown Area

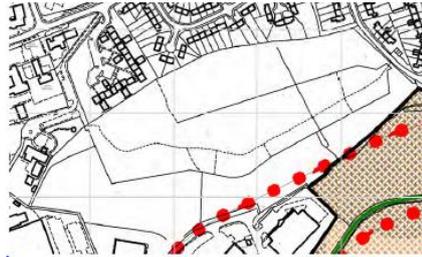
Existing Stock	Unit Availability
Dyffryn Enterprise Park	<p>Dyffryn Enterprise Park offers 21 units, of a range of sizes, including an area of smaller workshop type units. The majority of units are used for B2 and B8 uses.</p> <p>At the time of survey, 19 units were found to be occupied, giving an occupancy rate of 90%.</p> <p>The two units available at the site are 9,380 sq.ft. and 13,785 sq.ft. in size.</p>
Mochdre Industrial Estate	<p>The Estate includes B1, B2 and B8 uses. At the time of survey, an occupancy rate of 90% was identified. Eight units are currently available to let within the Estate, ranging in size from 800 sq.ft. to 6,300 sq.ft.. The majority of vacant units are located towards the entrance of the Estate.</p>
Vastre Industrial Estate	<p>At the time of survey, an occupancy rate of 89% was identified for the Industrial Estate.</p> <p>Five vacant units are currently available at the Estate, ranging in size from 505 sq.ft. to 3,245 sq.ft.</p>

St Giles Business Park	<p>The Business Park contains nine units, of which six are currently occupied (giving an occupancy rate of 67%).</p> <p>The three vacant units are of sizes 1,391 sq.ft., 1,519 sq.ft. and 2,567 sq.ft.</p>
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5.1.4 Outside of the business parks / industrial estates, other employment opportunities identified within the Newtown area are summarised in Table 5-5 below. These include both vacancies within existing stock as well as potentially developable land (white land) within the Newtown settlement boundary. Where appropriate, the numbers of available units and corresponding sizes has been provided.

Table 5-5 Other Employment Opportunities

Location	Comments
The Business Centre, Gas Street	<p>Located to the east of the town centre, offering retail/workshop premises with ancillary offices extending to just over 2,000 sq.ft.</p> <p>The property, which has an established A1/B1 use, comprises a retail unit (1,007 sq.ft.), rear workshop (358 sq.ft.) and first floor office accommodation (500 sq.ft.).</p>
Royal Welsh Warehouse, Station Road	<p>Located 0.3 miles to the south of the town centre, offering a variety of retail, office and storage opportunities. The lower and upper ground floors and first floor are currently occupied by well-known companies including Littlewoods. Recently refurbished.</p> <p>Currently there is 31,800 sq.ft. of space available which may be available in sections (second and third floors of the building).</p>
St David's House, New Road	<p>Located to the south of the town centre, offering long and short-term office lettings. At present three office suites are available – 180 sq.ft, 260 sq.ft. and 340 sq.ft. Marketing information for the site identifies that more suites may be available shortly.</p>
Commercial premises, Kerry Road	<p>Commercial/industrial unit offering 5,440 sq.ft. of space.</p>
Former Peugeot Express Fit unit, Stone Street	<p>Former vehicle repair workshop.</p>
Commercial unit, Chapel Street	<p>2,000 sq.ft. of space located to the west of the town centre.</p>
Commercial / industrial units, New Road	<p>5,000 and 6,000 sq.ft. units found to the south of the town centre.</p>
Former garage, Severn Square	<p>Former garage building comprising 4,735 sq.ft. close to Newtown town centre.</p>

Former Malthouse and builders yard, Bryn Street	Currently being marketed as a redevelopment opportunity for residential use.
New Road site	Development opportunity comprising 710 sq.ft to the south of the town centre on New Road. Previously a garage. Site likely to require extensive development work.
Area to rear of Laura Ashley depot, Mochdre Industrial Estate	Site occupying the green space at the rear of the Laura Ashley depot, comprising approximately 0.85ha.
	Undeveloped site immediately to the south of the A489 and to the north of the Mochdre Industrial Estate. The site is approximately 0.72ha in area and has been proposed as a candidate site (CS 140) for retail / hotel / pub / commercial use. The site is located within the development boundary and has the potential for employment uses. However, the Site Status Report noted highways and ecological constraints precluded its allocation. Its acceptability for development may therefore be determined through the planning application process.
	This site is a discrete hill located to the south west of Newtown, positioned to the north of Dolfor Road, to the south of the Plantation Road residential development, to the east of the Mochdre Industrial Estate and Cedewain School. Whilst the site in its entirety is unlikely to be suitable for development, there may be pockets of land (particularly adjacent to the Industrial Estate) which are suitable. The northern part of the site is currently the subject of a residential development application (P/2014/0482).
	Located in north-east Newtown at the southern edge of the Vastre Industrial Estate, comprising approximately 1.95ha of land.
	The site, which is approximately 1.5ha in size, is located to the south west of Newtown, south of Heol Ashley and adjacent to the Mochdre Industrial Estate. The site comprises two parcels of land bisected by an access lane to Castell-y-dail.

5.1.5 The review of allocated sites, existing stock and other employment opportunities identified within the Newtown area has shown that there is currently a range of sites and premises of both size and status available to potential developers/businesses, including the serviced but undeveloped site at Abermule. The review of the other (candidate) sites has confirmed that none of these sites are suitable for allocation within the draft LDP and that the constraints

originally identified during the surveys to inform the Site Status Report remain. However, to offset the loss of the Golf Course site, a further 5-6ha of potentially developable land (white land) within the Newtown settlement boundary has been identified. It is not considered that it would be necessary to allocate this land for employment purposes. For these sites, proposals for development for employment purposes would be tested by criteria-based policies contained in the Deposit Draft LDP.

- 5.1.6 Plan period. This study has identified that in terms of employment land provision in and around the settlement of Newtown, the review of vacant premises and “white land” has proven there are sufficient sites and premises available to ensure range and flexibility. This Position Statement has acknowledged that whilst only one employment site will remain allocated in Newtown, proposed LDP Policy E2 will enable other sites to come forward if necessary. Should there appear to be constraint at any stage during the Plan period in terms of employment land provision, appropriate monitoring will identify the requirement and it can be considered during review of the Plan.

- 6.1.3 LDP policies that support Welsh Language and Culture across the whole County include providing appropriate employment and retail provision and opportunities to build and sustain strong local economies, enabling Welsh speakers to work where they live and therefore assist in deterring people (particularly young people) from moving away from the region.
- 6.1.4 A Welsh Language Impact Assessment of Communities in the Upper Swansea Valley was undertaken in 2013 by Menter Iaith Castell-Nedd Port Talbot to help inform the preparation of the Powys LDP, through the examination of a community in Ystradgynlais to help understand the likely impacts of new development on Welsh speaking communities. The study concluded that whilst new housing development can have an influence on Welsh speaking communities, other factors such as demographics, household size and employment can also have influence over the linguistic balance of a community. Drivers of change identified in the Topic Paper include declining traditional industries – for example the decline in mining activities in the Ystradgynlais area and the shift away from more traditional farming practices in Wales generally. Key issues include the need for policies to ensure a sufficient level and range of economic opportunities, including sites and premises to support and develop local communities.
- 6.1.5 The Sustainability Appraisal prepared for the revised Deposit Draft LDP in June 2015 states that ‘overall, the delivery of 6,071 dwellings and 49ha of employment land is expected to have a significant positive effect on Strategic Environmental Assessment (SEA) Objectives 3 (enhancing the provision of housing, employment and community services) and may help to protect and enhance Welsh language and culture through the delivery of housing and jobs to meet local needs’. The SEA also refers to significant positive effects of LDP policies in relation to the SEA Objectives relating to cultural heritage (SEA Objective 16, Welsh language and culture) and goes on to state that ‘housing policies support the protection and enhancement of Welsh language because by meeting local needs, Welsh speakers will have better opportunities to stay within their communities’. The assessment of Employment Policies E1, E2, E3 and E4 concludes that there will be a minor positive impact on SEA Objectives relating to cultural heritage, noting that ‘a sufficient level and range of economic opportunities, including sites and premises to support and develop local communities’ is provided.
- 6.1.6 The assessment of individual site allocations considers the effects of proposed allocations on Welsh language and culture, noting some uncertainty at this stage – new housing and the creation of jobs associated with employment land provision may help to retain indigenous Welsh speaking populations in the County / encourage Welsh speakers to return, or on the other hand it may attract non-Welsh speakers which could affect Welsh-speaking communities. It is anticipated that potentially negative impacts could be mitigated through appropriate Development Management policies within the LDP (previously DM2 and DM3 prior to Focussed Changes).
- 6.1.7 The revised allocation of 45ha identified in this Position Statement covers employment sites across Powys, both within and outside of the Welsh language stronghold areas. The purpose of the employment allocation is fundamentally to provide flexibility and choice to existing as well as new businesses within Powys and to thereby cater for the employment needs of existing communities. Whilst specific developments (for example high quality or niche new businesses) may lead to a degree of in-migration from outside of Powys, this is anticipated to be at the local level only and, as described earlier, could be mitigated by appropriate policies within the LDP.
- 6.1.8 Both the Machynlleth and Ystradgynlais areas are identified as Welsh language strongholds. Both areas have high quality employment site allocations in the revised Deposit Draft LDP – 2.31ha at the Woodlands Business Park in Ystradgynlais and 1.3ha

(now revised to 1.7ha) at the Treowain Enterprise Park in Machynlleth. However in both areas there is also a range of other employment opportunities outside of allocated sites.

- 6.1.9 The Welsh Language Impact Assessment noted that ‘although new development can reinvigorate the community it is also likely to create new pressures for the language’. There is therefore a delicate balance to be struck between the provision of sufficient housing and employment to retain the current Welsh speakers within these communities, but to not to over-provide such that an influx of non-Welsh speakers erodes the nature of the Welsh speaking strongholds. The outcomes of this assessment are reflected in the relatively small employment land allocations in these areas as described in 6.1.8. The level of self-containment within the sub-areas was referred to earlier in this report. In the sub-areas which are Welsh language strongholds – a level of 80% for the Machynlleth area (relatively self-contained), whilst much lower for Ystradgynlais (some 60%), reflecting the daily in-migration of workers from the Neath Port Talbot area. The travel to work pattern exhibited for the Ystradgynlais is not considered to be of concern, given the low employment base for this area anyway (4% of total Powys employment).

7 Site Deliverability

- 7.1.1 This section considers further issues associated with site deliverability. A main principle of the development plan is to act as an effective tool for the delivery of sustainable development and local aspirations. This accords with the requirements of Welsh Government, which has identified the importance of 'deliverability' as a key guiding principle for LDPs. Site delivery is highlighted as being a pertinent issue as it holds significant implications for the content of LDPs and the way that they are produced. Consequently, it is important that delivery is considered throughout the LDP preparation process.
- 7.1.2 Deliverability is also a key element of meeting the tests of soundness, as set out in Planning Policy Wales (PPW) (Edition 8 January 2016), the Welsh Government LDP Manual (Edition 2, 2015) and updated examination guidance prepared by the Planning Inspectorate (PINS August 2015). The LDP Manual refers to deliverability issues, stating that 'it is important to be able to demonstrate that there are no fundamental impediments to the development of the sites allocated in the plan' and that the plan strategy is to take account of a range of matters, including a broad assessment of the deliverability and viability of strategic sites. PPW identifies three soundness tests, of which Test 3 covers issues such as can the sites allocated be delivered; is the Plan sufficiently flexible; and will development be viable.
- 7.1.3 This policy position reflects the growing recognition within planning of the critical link that exists between the aspirations set out within development plans and the delivery of individual site allocations in achieving timely and sustainable development during the course of the Plan period and to remove the uncertainty that has hitherto existed around the deliverability of site allocations.
- 7.1.4 Key to site deliverability can be the issue of viability. Development sites are heterogeneous, with many variables, including the market, labour and material costs as well as unforeseen abnormalities or problems; the other side of the coin relates to how attractive a site might be for developers (for example an accessible site with good transport links and well connected with potential markets would be more attractive than a site where the opposite is the case). Some locations will inevitably be more viable than others.
- 7.1.5 The broader issue facing Powys relates particularly to the commercial viability of the redevelopment of existing sites. The original Assessment identified that the primary driver of future employment land and property requirements is anticipated to be the need to replace and upgrade the existing supply of premises in order to tackle issues of dilapidation and the need to deliver the required type and quality of premises for modern business occupiers (the estimate of requirements within this category was identified as being between 21-29ha). The challenge therefore very much relates to the need to find creative mechanisms to deliver.
- 7.1.6 Both the original Assessment and the 2015 Addendum identified four Local Growth Zones (LGZs) created in Powys to support regeneration activities, of which three are currently being progressed, namely:
- The Severn Valley (covering Welshpool, Newtown and Llanidloes);
 - Llandrindod Wells; and
 - Brecon, Bronllys and Talgarth.
- 7.1.7 Within the Severn Valley, funding has been provided by Welsh Government to take forward the Sirrolli EFFECT model for the period up to the end of March 2016, which focuses on using a community based enterprise facilitator to work with individuals to promote an enterprise culture and encourage self-employment. The project aims to support 30 existing

businesses and seven social enterprises as well as to create 25 new start-ups and create and safeguard 75 jobs in the Severn Valley.¹

- 7.1.8 Economic regeneration models such as the LGZs can help prioritise areas where commercial property market failure is a particular issue and help enable public sector intervention. This can take the form of bringing sites forward through the provision of new-build or refurbished premises as appropriate. Examples have included high quality infrastructure works undertaken at Offa's Dyke Industrial Park (Welshpool) and at Abermule (Newtown) as part of the EU supported Severn Valley Strategic Regeneration Programme.
- 7.1.9 An additional focus on economic regeneration is in Ystradgynlais to the south of the County, which falls into the Western Valleys Communities First cluster (working across both Powys and Neath Port Talbot). Funding from Welsh Government will be used to work towards the long-term sustainability and well-being of communities.
- 7.1.10 The 2015 Addendum identified that supply broadly matches the forecast allowance for each of the four sub-areas outlined in the original Assessment. The exception was noted as being the Central Powys area, which broadly covers the settlements of Rhayader, Llandrindod Wells and Builth Wells and where the level of employment land supply (25ha) potentially exceeds the demand requirement (9.6-13.5ha).
- 7.1.11 All of the sites allocated for employment land have been assessed for constraints and none of the assessments have identified significant constraint issues, which has also been confirmed in consultation with the site owners. Furthermore, as well as the emerging interest evidenced in Section 3, many of the allocated sites are existing, serviced sites which already have partial occupation indicating that delivery is possible.

¹ <http://gov.wales/newsroom/businessandeconomy/2014/8787822/?lang=en>

8 Summary

8.1.1 In summary, the main findings of this Draft Position Statement are as follows:

- The Employment Needs Assessment and subsequent evidence documents (the 2015 Addendum and this Draft Position Statement) have provided guidance as to how the right types, scale and location of premises can be made available to enable economic development in Powys. It should be emphasised that the allocation of employment land includes uplift to cater for where need may come forward and ensure flexibility and choice for businesses and developers across the County. In addition, three prestige, strategic employment sites; Heart of Wales at Llandrindod Wells, Buttington Cross and Offa's Dyke in Welshpool are geared to providing long term and high quality capacity beyond the current Plan period;
- That there does not appear to be a strong case for major cross-border working, when considering Powys as a whole in line with the 'larger than local' guidance set out in TAN23 and associated Practice Guidance. In the Powys context, due to the scale of the County and extent of existing economic flows and linkages outside of the area, it is not considered that this approach is necessary;
- There is currently evidence of strong demand from businesses, exhibited both by the level of enquiries processed in relation to specific sites and premises; planning applications submitted in relation to undeveloped plots; and surveys/research that has been undertaken;
- The loss of up to 4ha of employment land in the Newtown area (St Giles Golf Course) has been identified. Accordingly, a review has been undertaken of other sites and employment opportunities within the Newtown area to identify what alternative provision may exist. Newtown is one of the economic hubs of the County; the impact of the proposed by-pass on future employment growth needs also to be considered. The review has identified that there is currently a range of sites and premises of both size and status available to potential developers/businesses. Should there appear to be constraint at any stage during the Plan period in terms of employment land provision, appropriate monitoring will identify the requirement and it can be considered during review of the Plan;
- No adverse impact on Welsh language strongholds as a result of the current employment land allocations has been identified. The allocations are considered to provide appropriate opportunities within strongholds for people to access employment, and are not considered to lead to excessive in-migration and the dilution of the Welsh speaking community;
- Finally, in relation to site viability and deliverability, it is considered that the challenge very much relates to the need to find creative mechanisms to deliver sites, for example through the use of the Local Growth Zones or alternative measures that may come forward during the Plan period.

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