

VALE OF GLAMORGAN
REPLACEMENT LOCAL DEVELOPMENT PLAN
2021 - 2036

Retail Centre Uses

November 2025



BACKGROUND PAPER - BP47A



This document is available in Welsh / Mae'r ddogfen hon ar gael yn Gymraeg

Executive Summary

- I. This background paper is one of a series produced by the Vale of Glamorgan Council and forms part of the evidence base to inform the policies and site allocations in the Deposit Replacement Local Development Plan (RLDP). Each background paper can be read in isolation or together with other background papers to gain a wider understanding of the land use issues facing the Vale of Glamorgan.
- II. This paper reviews existing national and local policy regarding retail uses in designated retail centres. It assesses the approach that should be taken to address the proportion of A1 and non-A1 uses within the retail centres designated boundaries and the impacts of an overconcentration of non-A1 uses. The paper works in conjunction with BP47 – Retail Boundaries Review in providing more flexibility in the use of retail units.
- III. As a result of this background paper no detailed policy is recommended to provide maximum limits to non-A1 uses in the different types of centres in the retail hierarchy. It recognises the removal of primary and secondary frontages allows for flexibility in the retail centre, but that significant overconcentration's of non-A1 uses would still harm the viability and attractiveness of the centres.
- IV. Instead, it is recommended that the proportion of each use is monitored at each Annual Monitoring Period (AMR) over the course of the RLDP's adoption and significant increases in non-A1 uses and decreases in A1 uses should require intervention. This should be done for both town and district centre as well as village, local and neighbourhood centres. No specific monitoring targets have been set in this background paper due to the monitoring period being some time from the preparation of this paper and the changes likely to occur in the composition of the Vale of Glamorgan's retail centre.

Contents

1. Introduction	1
2. Policy Context	2
National Planning Policy	2
Local Policy	3
3. Nexus Report	5
4. Retail data	6
5. Conclusions and recommendations	11

1. Introduction

- 1.1 This Background Paper forms one of a series produced by the Vale of Glamorgan Council as part of the evidence used to inform policies and site allocations in the Replacement Local Development Plan (RLDP) 2021-2036. Conclusions from this review will form part of the evidence base for the RLDP to identify the concentrations of different use classes in the Vale's retail town and district retail centres and measures to ensure the importance of A1 uses and their role in maintaining a vibrant retail scene.
- 1.2 The Paper examines the existing distribution and concentration of ground floor use classes within the Vale of Glamorgan's designated town and district retail centres. In particular it considers the relationship between A1 retail uses and other commercial, service, and complementary uses, and the extent to which this balance supports the character of centres. Since the adoption of the Local Development Plan (LDP) in 2017, retail centres have experienced significant change driven by evolving consumer behaviour, increased online shopping, and the impacts of the COVID-19 pandemic. For these reasons, Policy RCS1 updates Policy requirements for the RLDP for changing Class A1 uses to reflect the trends that have been observed since the LDP's adoption in 2017.
- 1.3 The review is informed by the Nexus Retail and Commercial Leisure Study (June 2023), which assessed the health and performance of the Vale's town and district centres and made recommendations on supporting resilient and active centres. It is also informed by the Council's ongoing monitoring of retail centres, including data on changes in occupancy, vacancy rates, and use class composition. This evidence is used to identify areas where concentrations of non-retail uses may be undermining retail function, and what changes can be made to policy to maintain healthy town and district centres. This data and guidance from national policy is what has informed Policy RCS1.

2. Policy Context

National Planning Policy

- 2.1 Section 4.3 of Planning Policy Wales (PPW) Edition 12 (February 2024) covers Retail and Commercial Centres and development. This section of PPW also covers the importance of A1 uses and their role maintaining a vibrant retail scene.
- 2.2 Paragraph 4.3.31 states that “Primary areas are typically characterised by a high proportion of A1 retail uses, and their designation requires an understanding of the existing distribution of uses in a centre together with careful consideration of a centre’s role and how it relates to the retail strategy for the area.”
- 2.3 While protecting A1 uses is important, Local authorities must promote viable retail centres as the most sustainable locations and focal points for new retail units while sustaining and enhancing their vibrancy and role. Paragraph 4.3.35 of PPW therefore states *‘Achieving diversity of uses and activities may require a flexible approach to planning. Where the right balance of use and activity is not being achieved, planning authorities should consider making changes to the acceptable uses in primary or secondary areas, or the retail and commercial centre boundaries themselves.’*
- 2.4 Further to this point, Paragraph 4.3.36 states that in situations of economic decline, protective measures on A1 uses should be overruled in favour of centre’s viability and vitality- *“Planning authorities should assess retail and commercial centre performance and the effectiveness of development plan policies by monitoring their health. They should use the strategy in their development plan to manage change and take action where necessary to address this. Where economic decline is impacting on a retail and commercial centre, emphasis on retaining A1 uses in premises either in primary or secondary areas, which have been vacant for a period of time, may undermine a centre’s viability and vitality. In such circumstances planning authorities should consider how non-A1 uses may play a greater role to increasing diversity and reducing vacancy levels.”*
- 2.5 Finally, Paragraph 4.3.37 states the importance of rationalising centre boundaries to concentrate A1 uses, *“On the periphery of a retail and commercial centre that has been assessed to be in decline by a planning authority, and where regeneration initiatives are thought unlikely to be successful, changes to the retail and commercial centre boundary may be appropriate. Rationalising a centre’s boundary can help concentrate both A1 and non-A1 uses in a smaller more viable area, whilst potentially releasing property outside the new boundary for residential and other appropriate uses. Within a retail and commercial centre boundary change of use to residential may also be acceptable and help contribute to the viability and vibrancy of a centre.”*

2.6 **Technical Advice Note (TAN) 4: Retail and Commercial Developments (2016)** provides further guidance on how a centre's circumstances and financial success should inform how much protection is given to A1 uses. Paragraph 9.2 states "*When the retail industry is buoyant and a centre's economic performance is strong such a distribution of uses is likely to be the most appropriate approach, and restrictions to non-A1 uses in primary areas Technical Advice Note 4 – November 2016 – Retail and Commercial Development 13 Technical Advice Note 4 – November 2016 – Retail and Commercial Development are likely to apply. However, when a retail and commercial centre's performance is poor, due perhaps to local or national economic conditions, and frontages become characterised by persistently high vacancy rates, local planning authorities should consider applying a more flexible strategy*"

2.7 TAN 4 goes on to discuss how local authorities may apply different restrictions to changes of use from A1 to non-A1 uses in primary frontages and adjusting the restrictions at different frontages. However, the Vale of Glamorgan Council intends to remove the primary and secondary frontage designations as recommended in the Nexus report (2023) and included in the Retail Boundaries Review Background Paper. TAN 4 also states in regard to residential uses in retail centres "*Whilst residential use is unlikely to be appropriate at ground floor level in primary areas, residential use on upper floors can add to a centres vibrancy and viability, increasing footfall and contributing to both the daytime and evening economies of a centre.*"

2.8 **Future Wales: The National Plan 2040** is the national development framework and direction for Wales to address key national priorities. Policy 6 'Town Centre First' recognises the need to make town centres multi-functional places. It seeks to include new and diverse uses within town centres, that should have good public transport access. This includes the protection, location, and vitality of shops within town centres, including A1 uses.

2.9 **Building Better Places (2020): The Planning System Delivering Resilient and Brighter Futures** sets out the Welsh Government's planning policy priorities to support recovery following the Covid-19 pandemic. In relation to retail and A1 uses, the document emphasises the need for town and retail centres to adapt to changing economic conditions and consumer behaviour by operating in a more flexible and sustainable manner. It recognises that centres must respond to structural changes in retailing, stating that planning policy should support "*more flexible and mixed-use town centres which can respond to changing economic circumstances*".

Local Policy

2.10 Objective 6 of the **Adopted Local Development Plan (2017)** is 'to reinforce the vitality, viability and attractiveness of the Vale of Glamorgan's town, district, local and neighbourhood shopping centres.' To achieve this, the LDP sets out a retail hierarchy in Policy MG12 – Retail Hierarchy. The centres within this hierarchy are discussed in Section 3.

- 2.11 Policy MG14 on Non-A1 Retail Uses within Town and District Centres sets the policy framework against which applications for non-A1 uses at ground floor level would be considered. This policy differentiates between primary and secondary frontages with maps of the frontages set out in Appendix 5 of the LDP. This policy currently protects A1 uses from overconcentration of non-A1 uses in centres although as aforementioned these designations are to be removed.
- 2.12 Policy MG15 on Non-A1 Retail Uses within Local and Neighbourhood Retail Centres applies a similar framework to the smaller centres set out in the hierarchy of policy MG12. This Policy also protects A1 uses, in proportion to their hierarchy within the LDP.
- 2.13 Supplementary Planning Guidance (SPG) is also available on **Retail and Town Centre Development (2023)**, which supports the implementation of the policies in the LDP. The SPG was updated to reflect changes in national policy on the role and function of town centres and as a consequence it highlights that the Council will adopt a more flexible approach to the application of Policies MG14 and MG15 and will give weight to the benefits that can be secured from other non-A1 uses that can benefit the overall vitality and viability of the retail centres.

3. Nexus Report

- 3.1 The Vale of Glamorgan commissioned a Retail and Leisure Study to be conducted which was co-ordinated by Nexus Planning in June 2023. The Study reflects the requirements of PPW and TAN 4: Retail and Commercial Development (2016) and was informed by the Vale of Glamorgan's adopted LDP. It provides guidance to inform the RLDP regarding retail centre hierarchy, boundaries and spatial extent of centres and policy approaches to retail.
- 3.2 The study assesses the health and performance of the five town and district centre in the Vale of Glamorgan through a combination of quantitative and qualitative indicators including the distribution of use classes, vacancy rates and market representation. It also covers the contribution that non-retail uses have to the overall vitality and viability of centres.
- 3.3 The Nexus Report identifies that the town and district centres of the Vale experience similar structural challenges to centres across the country including a reduced demand for traditional A1 retail units and increased vacancies. The study concludes that rigid protection of A1 uses is not required in many centres and that a more flexible approach to the management of non-A1 uses is required to support resilience. A1 retail remains important but is complemented by a variety of other uses and services that contribute to footfall, evening economies and dwelling time particularly when integrated well into the centre.
- 3.4 A key recommendation of the report is the removal of primary and secondary frontage designations within the town and district centres. The report identifies these measures as overly rigid policies on retail and no longer reflect how centres operate. Nexus concluded these designations may unintentionally constrain what could be beneficial; uses to centres and fulfil retail demand where it is weaker or where vacancies are higher. The Vale of Glamorgan Council has accepted this recommendation and will remove the primary and secondary frontages from its centres as included in the Retail Boundaries Background Paper.
- 3.5 While advocating for flexibility, the Nexus Study recognises that an unmanaged proliferation of non-A1 uses particularly where clustered can erode retail character, reduce shopping choice and weaken the centre's role. The Study therefore supports a balanced approach whereby non-A1 uses are encouraged where they contribute positively to activity and diversification, but some form of control should be retained to prevent overconcentration and the loss of a critical mass of A1 retail uses. The Study recognises the need for policies to reflect the differing roles and functions of centres within the retail hierarchy. The Council will therefore consider varying approaches as opposed to a uniform policy for all centres. This is further discussed in section 4.
- 3.6 This Background Paper builds on the Nexus Report and the evidence and suggestions it presents using updated retail monitoring data to assess the current proportion and distribution of non-A1 uses across the Vale's retail centres. Policies should support mixed-use adaptable centres advocated by the study, PPW and Future Wales.

4. Retail data

- 4.1 The retail data provided through the Nexus report is used in addition to retail data held by the council to assess the composition of the retail scene in each centre and across the Vale.
- 4.2 Objective 7 of the RLDP – Fostering Diverse, Vibrant and Connected Communities aims to 'Enable diversification of uses within town and local commercial and service centres to offer a mix of retail, leisure, commercial and community uses. To achieve this and as mentioned in Sections 2 and 3, the RLDP sets out an updated retail hierarchy in Policy SP10 – Retail, Commercial and Service Centres and the boundaries for each type of retail centre in the appendices to the plan. The RLDP policy on Resilient Town Centres, lists A1, A2, A3 (excluding hot food takeaways), D1 and D2 uses as development types that will be supported. It states any change from these uses must adhere to a checklist of criteria stated in the policy and exclusion of takeaways from this policy means a requirement for a separate set of criteria for permission.
- 4.3 Retail centres in the Vale mark the focal points of various communities of different sizes and cultures. They provide a variety of activities to their surrounding communities from convenience and comparison goods to health, education and office spaces. These centres however face issues impacting the retail scene that damage the composition and vitality of retail centres and their occupied units. It is important to ensure the variety of units and retail uses in retail centres is well balanced in order to keep them as a convenient hub for goods and services where then individuals do not have to travel further from their local area in order to obtain basic convenience goods needed on a daily basis.
- 4.4 As PPW states, A1 retailing uses should underpin retail and commercial centres with primary shopping areas being characterised by a high proportion of A1 uses. Primary and secondary frontages would normally control the proportion of non-A1 uses permitted in the area dependent on the frontage designation that retail development and changes of use were proposed in. With the removal of primary and secondary frontages suggested in BP47 Retail Boundaries Review through the recommendation made in the Nexus Report, there is an increased need to ensure a higher proportion of and promoting A1 uses in retail centres through other means. The removal opens up the whole retail centre to be more flexible instead of having the primary designated area more tightly controlled than the secondary and restricting potential to bring forward new uses. Alternative measures will ensure that the vitality, viability and attractiveness of retail centres are still supported where non-A1 uses are still controlled in regard to the whole retail centre.
- 4.5 In order to provide a more flexible approach than primary and secondary frontage designations that control non-A1 uses but still have a limit on the proportion of these uses in the retail centre an alternative is required to determine and prevent an overconcentration. It is considered that the most effective way to do this is through

monitoring the proportion of different retail centre uses within the centre boundaries. This should be done through an indicator contained in the Annual Monitoring Report (AMR) for the RLDP monitoring the proportion of each type of use to determine the concentration of non-A1 uses in each centre.

- 4.6 The Councils evidence base and retail data can be used to define what an overconcentration of non-A1 uses would constitute during the monitoring periods. The Council currently monitor data and uses of retail centres and have done so over the adopted LDP AMR periods. As part of this a dataset containing information on every unit within the boundaries of every retail centre is held and updated yearly to inform the retail monitoring. The most recent retail monitoring background data from April 2025 has therefore been used. However, this data has been amended to include units in the data that were not previously included in the LDP monitoring because of the retail centre boundary changes proposed in the Retail Boundaries Background Paper for the RLDP. The use of these new units for inclusion was identified through use of GIS, Google Streetview and site visits to confirm the location and use of these units.
- 4.7 Tables 1a and 1b show the number of units of each use class in every retail centre in the Vale of Glamorgan based off this data collected. These tables also include the percentage of the total units that are non-A1 units in each. The tables only include use classes that are frequently found in that type of retail centre in the hierarchy.

Table 1a: Number of each type of use class retail unit and proportion that are non-A1 in town and district centres in the Vale of Glamorgan

Retail Centre	A1	A2	A3	B1	B2	C1	D1	D2	Sui-Generis	Vacant	Total	Total minus vacant	% of A1	% of non-A1	% of non-A1 minus Vacant
Barry Holton Road	71	17	26	5	0	0	9	1	17	29	175	146	40.57	59.43	51.37
Barry High Street/Broad Street	50	12	32	1	0	0	2	2	11	14	124	110	40.32	59.68	54.55
Llantwit Major	44	11	20	1	0	0	9	0	9	7	101	94	43.56	56.44	53.19
Penarth	96	17	44	4	0	0	7	1	7	18	194	176	49.48	50.52	45.45
Cowbridge	76	11	20	2	0	2	9	1	5	21	147	126	51.70	48.30	39.68

Table 1b: Number of each type of use class retail unit and proportion that are non-A1 in village, local and neighbourhood centres and out of centre areas in the Vale of Glamorgan

Retail Centre	A1	A2	A3	B1	D1	Sui-Generis	Vacant	Total units	Total minus vacant	% of A1	% of non-A1	% of non-A1 minus Vacant
Local, neighbourhood and village centres												
Main Street	7	0	4	0	0	1	4	16	12	43.75	56.25	41.67
Barry Road	4	1	3	0	0	0	1	9	8	44.44	55.56	50.00
Vere Street	4	0	3	0	1	0	2	10	8	40.00	60.00	50.00
Park Crescent	17	3	2	2	1	4	8	37	29	45.95	54.05	41.38
Skomer Road	1	0	3	0	0	0	0	4	4	25.00	75.00	75.00
Cwm Talwg Centre	4	0	3	0	0	1	1	9	8	44.44	55.56	50.00
Bron Y Mor	1	0	4	0	0	0	0	5	5	20.00	80.00	80.00
Park Road	1	0	0	1	1	2	0	5	5	20.00	80.00	80.00
Pill Street	3	0	1	0	0	0	0	4	4	75.00	25.00	25.00
Cornerswell Road	10	1	4	0	2	4	2	23	21	43.48	56.52	52.38
Tennyson Road	4	0	2	0	0	0	0	6	6	66.67	33.33	33.33
Dinas Powys Village	5	3	9	0	0	0	2	19	17	26.32	73.68	70.59

Cardiff Road, Dinas Powys	4	2	3	0	0	4	0	13	13	30.77	69.23	69.23
Castle Court - The Parade	4	0	2	0	1	0	1	8	7	50.00	50.00	42.86
Camms Corner	6	1	0	0	0	2	0	9	9	66.67	33.33	33.33
Fontygary, Rhoose	7	1	2	0	2	1	0	13	13	53.85	46.15	46.15
The Square, St Athan	8	0	3	0	3	0	1	15	14	53.33	46.67	42.86
Boverton	3	0	2	0	0	1	1	7	6	42.86	57.14	50.00
Crawshay Drive	1	0	0	0	1	0	0	2	2	50.00	50.00	50.00
Upper Holton Road*	15	2	10	0	0	2	2	32	30	46.88	53.13	46.67
Out of centre retail												
Barry Waterfront RP	7	0	4	0	0	2	0	13	13	53.85	46.15	46.15
Dockside RP*	14	0	17	0	0	4	6	44	38	31.82	68.18	55.26
Palmerstone Centre	2	0	0	0	0	0	0	2	2	100.00	0.00	0.00
Pencoedtre Centre	1	0	0	0	0	0	0	1	1	100.00	0.00	0.00
Highlight Park	2	0	0	0	0	0	0	2	2	100.00	0.00	0.00
Terra Nova Way	1	0	0	0	0	2	0	3	3	33.33	66.67	66.67
Penarth Road RP	5	0	0	0	0	1	0	6	6	83.33	16.67	16.67
Culverhouse RP	2	0	0	0	0	3	0	5	5	40.00	60.00	60.00
Valegate RP	7	0	1	0	0	0	0	8	8	87.50	12.50	12.50
Brooklands RP	3	0	3	0	0	0	0	6	6	50.00	50.00	50.00

*Centres that have additional units in other use classes not included on the table that contribute to their total number of units.

4.8 The data from tables 1a and b show the variety of retail uses that exist in the Vale of Glamorgan's retail centres. It also calculates the percentage of non-A1 retail uses with vacant units included and excluded. For the purposes of this paper the column with vacant units excluded is used when referring to percentage of non-A1 uses in retail centres and in determining suitable measures. This is so the policy and its measures are based off the composition of the active frontage as vacant units have no existing use class. The town and district retail centres mostly reflect a similar proportion of non-A1 units with Cowbridge, Penarth, Llantwit Major, Holton Road and Barry High Street all having a proportion between 39% and 55%.

4.9 The local, neighbourhood and village centres vary in their proportion of non-A1 units. Across these the lowest proportion of non-A1 uses is 25% at Pill Street, Penarth. Meanwhile the highest proportion is 80% at both Bron Y Mor and Park Road. These percentages however do not necessarily imply a high number of non-A1 uses but instead a high ratio when compared to the total number of retail units.

4.10 In town and district centres the total number of retail units are much higher than the rest of the retail centres in the retail hierarchy. Therefore, the number of non-A1 uses as a percentage of the total number of retail units is far lower compared to some of the village, local and neighbourhood centres. At these centres the percentage that are non-A1 uses increases e.g. at Park Road and Bron y Mor. Because of these variations in the nature of retail centres a single measure cannot be applied to all retail centres as one collective.

4.11 Ultimately there would be a need to apply different limits to different retail centres of different sizes (measured by total number of units) as one limit can either be too restrictive or too flexible. These can render proposed measures ineffective or harmful to the retail centre and scene by restricting the number of uses that can come forward and leaving vacant units present in the centres for longer if no other use comes forward.

4.12 Based on the assessment of each retail centre and their proportion of non-A1 uses the nature of retail centres is considered too diverse to be able to effectively apply a policy for limiting the concentrations of non-A1 uses.

4.13 In addition to policies that aim to prevent an overconcentration of non-A1 uses in retail centres clusters of units can be harmful. Clustering of non-A1 uses in retail centres can damage the vitality and attractiveness of retail centres as excessively long continuous frontages of non-A1 uses can break up the shopping scene harmfully and create dead spaces on high streets.

4.14 While in some circumstances this may be effective it is not considered practical for the purposes of this paper. As non-A1 uses include everything other than commercial shops, limiting the number of non-A1 uses that can be adjacent together would be too restrictive particularly upon town and district centres, Imposing a more lenient measure

allowing a higher number of adjacent non-A1 units would render the policy ineffective due to the unlikely circumstances that such a high number of these uses would be located adjacent to each other.

5. Conclusions and recommendations

- 5.1 The Vale of Glamorgan's RLDP recognises the importance of its retail centres and maintaining their viability, vitality and attractiveness. Data and evidence produced by the Council and Nexus alongside the RLDP objectives support and justify the approach taken towards controlling the proportion of non-A1 retail uses in the Local Authorities retail centres.
- 5.2 Based on the evidence provided in this paper the Council should not permit an overconcentration of non-A1 uses in retail centres in the Council's policy on resilient retail centres. However, specific limits on different retail centres should not be included in the policy. The diverse nature of the Vale's retail centres even within different sections of the retail hierarchy make such a measure unsuitable. There is also difficulty in producing specific concentration limits due to the presence of vacant units. Excluding them from calculations means they remain unaccounted for if brought forward for non-A1 use and including them may hinder vacant units being brought back into use if they exceed the limits for non-A1 use presence.
- 5.3 Instead, the Council should monitor the proportion of non-A1 units as part of the RLDP's AMR's with two separate indicators. One for town and district centres and a second for local, neighbourhood and village centres. Monitoring of the RLDP policies is not due to be undertaken for some time after the preparation of this background paper and the composition of the Vale of Glamorgan's retail centres is likely to change over the period before annual monitoring commences. Therefore, detailed monitoring triggers to decide concentration limits for town and district and village, local and neighbourhood centres will be considered and determined at that point.



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