



Employment Land Study

Torfaen

Executive Summary

March 2020

Introduction

- i. This report provides an Employment Land Review to support the Torfaen Replacement Local Development Plan (LDP). The study links to, and is informed by, the Regional Employment Study for Torfaen, Blaenau Gwent, Monmouthshire, Caerphilly and Newport. The study updates previous employment land evidence base documents for the County Borough.

Methodology

- ii. Several research methods have been used, including site visits and interviews with property market stakeholders such as developers, investors and their agents. Major employers in the County Borough have been individually consulted, as have key public-sector agencies. Finally, the land supply has been assessed against forecast data to understand future land need. The methodology follows Welsh Government '*Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan*' on employment land reviews and accounts for other Welsh Government Policy, including TAN 23 and Planning Policy Wales.

Findings

- iii. The socio-economic profile of Torfaen shows modest population growth, 0.7 percent, over the last five years, against growth across Wales/UK of 1.7-3.7 percent. Torfaen's unemployment rate is high in the national context but close to average for the Cardiff Capitol Region (CCR). Torfaen has issues with skill levels with a low proportion of residents qualified to degree level.
- iv. As of 2017, Torfaen's economy supported 37,000 jobs. Over the last five years, employment growth has fluctuated upwards and downwards, with a period of employment decline between 2013 and 2016. Overall, employment has increased by 1 percent, below the 3 percent growth observed in Wales, the 5 percent growth in CCR and the 9 percent growth in Great Britain. Where employment growth has occurred, it has been driven by gains in some high-value service sectors, such as ICT, Business Administration, Professional Services and Finance and Insurance, an overall gain of 3,100 jobs. Manufacturing too has grown by 500 jobs.
- v. The largest sector in Torfaen's economy is manufacturing, with 6,500 jobs (17 percent of total employment), 2.2 times the proportional size of the manufacturing sector in Great Britain. This reflects the fact that while Torfaen may have lost much of its

traditional industry, it has been successful in attracting new high value manufacturing and production businesses.

- vi. Health is the second largest sector in the economy (6,000 jobs, 16 percent of total employment), however, in recent years most public sectors have seen significant declines in employment, suggesting that local dependence on the public sector is reducing.
- vii. In terms of commuting, Torfaen has a modest level of self-containment. Overall, 55 percent of residents in employment work within the local authority area. The strongest commuting relationships are with Newport, Caerphilly and Monmouthshire. In terms of migration, Torfaen is an attractive destination for short range migration from the urban parts of the CCR. It attracts people of all age groups apart from those of university age.
- viii. Stakeholders report demand for industrial units of 200-300 sqm, 1,500-2,000 sqm and then large inward investment requirements of 10,000 sqm. Good quality units of 1,500-2,000 sqm are the main shortage at present as the market is not delivering space in this size range. Additionally, a number of large local businesses are looking to grow, with unit requirements in the 2,000-18,000 sqm range, for freehold space. Most have been unable to find the space they need locally. While small units are being delivered in the Employment Areas, delivery on several major employment sites is inhibited by unwilling landowners, who want their land developed for housing.
- ix. Businesses consulted see Torfaen as a logistically sound location, with good motorway and A-road links providing reasonable access to local, Welsh and national markets. No respondents noted skills issues, and many praised the well skilled local workforce.
- x. Macro-economic issues are suppressing some short-term growth, but historically companies have struggled to obtain the land and property they need. Several local businesses have taken short term steps, such as leasing smaller units, but larger supply constraints remain.
- xi. The Torfaen commercial property market is predominantly focused on the industrial sector with a strong manufacturing presence. Torfaen's office market is predominantly local in nature.
- xii. Llantarnam Industrial Park, Cwmbran is identified as is the main strategic scheme of

Torfaen, attracting interest from a larger than local market and a focus for inward investment in the County Borough. Key is its strong offer of larger good quality premises, particularly larger industrial properties which are less common elsewhere in the County Borough, and its strong strategic position on the A4042, only 2.5 km north of the M4. Llantarnam, and Cwmbran more generally, occupy valuable positions off the M4, east of the congested Brynglas Tunnels, with strong access east towards England. Rents at Llantarnam are £65-£86/sqm (£6.00-£8.00/sqm), significantly higher than in secondary industrial locations in Cwmbran, which achieve rental values of £43-£65/sqm (£4.00-£6.00/sqft). Rents in the north of the County Borough are lower still, reducing to £38/sqm (£3.50/sqft) around Blaenavon. Llantarnam Industrial Park, Cwmbran is also a very popular office location with office rents at £108-£135/sqm (£10.00-£12.50/sqft).

- xiii. Cwmbran Town Centre's office market is focussed towards letting smaller suites to local financial/legal services firms, rather than attracting large-scale occupiers. There is no real office market in Pontypool apart from a few, 50-100 sqm suites above shops in the Town Centre, which meet local service sector needs.
- xiv. In addition to the supply of B1/B2/B8 land and premises, discussed below, a Life Sciences/Medi Park Hub is proposed to the immediate south the Grange University Hospital site, Cwmbran. A key new specialist employment facility for Wales, plans would see a Medi Park of some 5.2 ha delivered. Land and property will be made available to firms engaged in service and supply activities associated with the life sciences, as well as 'core R&D and production' in sectors such as biopharmaceuticals and medical technologies. Separate research has concluded that there is strong initial demand to support the proposal.

Employment Land Supply and Need

- xv. The maximum employment land supply, from 16 undeveloped LDP allocated sites, is 64.1 ha. Analysis suggests that 30.72 ha, 47.9 percent, of the above allocated LDP supply remains available as of late 2019/early 2020. Of this, 26.33 ha is likely to remain available over the medium and long term and could be allocated again in the next LDP.
- xvi. To assess need, three recognised methods of forecasting have been used, reflecting Welsh Practice Guidance:

- Practice Guidance Method One: Past Building Completions – Utilises all past take up data since 2007, identifying an annual average take-up rate of 42,301.5 sqm/year calculated on a 40 percent plot ratio
- Practice Guidance Method Two: Labour Demand Forecasting (Policy Off) – jobs growth, as identified in Oxford Economic (2019) forecast modelling, consistent with jobs densities and plot ratios defined in Welsh Practice Guidance
- Practice Guidance Method Two: Labour Demand Forecasting (Policy On) – jobs growth, as identified in Oxford Economic (2019) forecast modelling, but with an allowance for an extra 373 extra jobs to 2033 linked to Medi Park proposals. The jobs are split 50:50 between manufacturing and office-based uses. The model again uses jobs densities and plot ratios defined in Welsh Practice Guidance.

xvii. The outputs from all the models are outlined in Table ES1.

Table ES1 – Land Forecast Models – Summary

Model	Land Stock 2019, ha*	Land Need 2018-2033, ha	Flexibility Buffer (five years take-up rate) ha	Land Need Incl. flexibility buffer	Surplus, ha	Assumptions
Practice Guidance Method One: Past Building Completions	26.33	B1: 0.19 B1/B2: 6.96 B8:3.44 Total: 10.59	B1: 0.06 B1/B2: 2.32 B8:1.15 Total: 3.53	B1: 0.25 B1/B2: 9.28 B8:4.59 Total: 14.12	12.21	Based on historic (12 years) take-up of 2,820.1 sqm/year at a 40 percent plot ratio
Practice Guidance Method Two: Labour Demand Forecasting	26.33	<i>Net Change</i> B1: 4.42 B2/B8: (27.27) Total: (22.85) <i>Growth Only</i> B1: 5.12 B2/B8: 1.61 Total: 6.73	<i>Net Change</i> B1: 0.88 B2/B8: N/A Total: 0.88 <i>Growth Only</i> B1: 1.71 B2/B8: 0.54 Total: 2.25	<i>Net Change</i> B1: 5.30 B2/B8: (27.27) Total: (21.97) <i>Growth Only</i> B1: 6.83 B2/B8: 2.15 Total: 8.98	<i>Net Change</i> 48.30 <i>Growth Only</i> 17.35	Based on <i>Net Change</i> : Projected employment change across sectors <i>Growth Only</i> : Projected growth sectors
Practice Guidance Method Two: Labour Demand Forecasting (Policy On)	26.33	<i>Net Change</i> B1: 5.17 B2/B8: (24.17) Total: (19.00) <i>Growth Only</i> B1: 5.87 B2/B8: 1.61	<i>Net Change</i> B1: 1.72 B2/B8: N/A Total: 1.72 <i>Growth Only</i> B1: 1.96 B2/B8: 0.54	<i>Net Change</i> B1: 6.89 B2/B8: (24.17) Total: (17.28) <i>Growth Only</i> B1: 7.83 B2/B8: 2.15	<i>Net Change</i> 43.61 <i>Growth Only</i> 16.35	Policy On – 373 additional jobs Based on <i>Net Change</i> : Projected employment change across sectors

Model	Land Stock 2019, ha*	Land Need 2018-2033, ha	Flexibility Buffer (five years take-up rate) ha	Land Need Incl. flexibility buffer	Surplus, ha	Assumptions
		Total: 7.48	Total: 2.50	Total: 9.98		<i>Growth Only:</i> Projected growth sectors

Source: Torfaen CBC/BE Group, 2019

*Long term land supply based on currently available allocated LDP sites.

- xviii. The figures allow for a minimum five-year flexibility buffer to allow for choice and potential change in needs during the LDP period as well as providing some accounting for further possible losses in the supply.
- xix. A further model, Resident Workforce (Demand from New Labour) has been produced which indicates the additional employment land need from the local 2,685 jobs generated to 2033 by the projected housing growth rate of 320 dwellings/ha, as identified in the Replacement LDP, to be 13.58 ha. However, this represents the employment land requirement specifically from these 2,685 extra jobs and is not a forecast of OAN for the whole Torfaen economy.
- xx. The outstanding supply of employment land, allocated in the LDP, meets the baseline OAN under these forecast models.
- xxi. The jobs based forecast model suggests the County Borough has an oversupply of employment land. This indicates that all the current land supply may be surplus to requirements based on this quantitative assessment. However, the market assessment, comparison of projected jobs losses in the manufacturing sector against the real industrial growth that has been achieved recently (see Section 3.0), the specialist nature of the local manufacturing base (see Section 5.0), and reviewing the historic trends in employment change and land take up (see Section 7.0), suggest that these forecasts underestimate land needs significantly.
- xxii. Thus, evidence favours Practice Guidance Method One: Past Building Completions which generates a minimum requirement of 14.12 ha to 2033.

Recommendations

xxiii. This report has had full regard to the requirements of TAN 23 and Planning Policy Wales to encourage and deliver growth through the planning system. The key recommendation is:

That the Council should use Practice Guidance Method One: Past Building Completions and the main method of assessing needs. This suggests that the County Borough's minimum employment land requirements are 14.12 ha to 2033 (inclusive of a five-year buffer).

xxiv. However, the OAN calculation is only part of the story and market evidence suggests a greater level of qualitative need, while the land supply is expected to reduce in the short term:

- There is strong demand for larger industrial units in the County Borough. Stakeholders report demand for units of 1,500-2,000 sqm and then large regional inward investment requirements of 10,000 sqm, which Torfaen cannot compete for as it rarely has units of this size available.
- Torfaen Council have identified several large local businesses, seeking to grow and/or acquire more modern and efficient facilities, and especially to become owner occupiers, who have struggled to acquire the space they need
- A number of such enquiries have considered EET4/1: Craig y Felin but have been unable to reach agreements for the land
- The focus of demand is Cwmbran, and sites with good strategic road access.
- Against this need, only six vacant industrial units of more than 2,000 sqm were recorded in August 2019 and local developers are delivering smaller industrial options only

xxv. In terms of land supply, while 30.72 ha remains available to meet needs at the time of writing, 4.39 ha of this, in five sites, is expected to be taken up before the Replacement LDP is adopted. Strong demand may mean that short term land take up is even higher. Of the remaining 26.33 ha, around a quarter (6.55 ha) is focused at Blaenavon, or 40 percent without EET4/1: Craig y Felin. In Cwmbran, supply is dependent on the delivery of SAA3: Llantarnam Strategic Action Area and EET4/1: Craig y Felin. Questions of deliverability remain over both these sites. Redevelopment plans at Mamhilad Park Estate will remove at least a portion of this 72,000 sqm facility and displace some of the 150 businesses which operate from here.

xxvi. Thus, it is recommended that Torfaen allocate employment land above the OAN identified in this Study. Large sites will be required, focused in Cwmbran and Pontypool, which can meet multiple large business requirements, of 2.5-8 ha each and also accommodate a range of smaller requirements. Meeting these needs and depending on what strategic employment land can ultimately be delivered at EET4/1: Craig y Felin will require the LDP to provide a further 20-30 ha to 2033, additional to the realistic long term supply still available (26 ha).

xxvii. Protecting the remaining elements of the existing employment land supply will also be key and Table ES2 provides recommendations on the 17 allocated employment sites in Torfaen, particularly considering sites which should be protected for B-Class uses as a priority in the LDP

Table ES2 – Employment Land Recommendations

Policy ID.	Name	Realistic Land Supply, ha	Protect for B-Class use the in the new LDP?	Recommendations
EET1/2	Llantarnam Park Plot A	0.7	Yes (In principle)	The site should be retained for employment use. Development has now commenced on the site for Police HQ and take up of the land is thus expected in the short term. It is assumed this land will be taken up before the next LDP is adopted.
EET1/2	Llantarnam Park Plot B	0.4	Yes (In principle)	The site should be retained for employment use. Development has now commenced on the site for Police HQ car parking and take up of the land is thus expected in the short term, albeit it for infrastructure for an adjacent use. It is assumed this land will be taken up before the next LDP is adopted.
EET1/4	Llantarnam Park Plot C	0.83	Yes	The site should be retained for employment use. Key infill plot in a high value local employment area, which is attracting market interest. Site owner still actively seeking to dispose of the plot, for B-Class uses, in the short term.
EET2/1	Former Gas Works Site, Panteg Way	1.28	Yes	The site should be retained for employment use. Lower quality land, possibly with contamination, but also a large, regularly shaped and well located site. Would suit B2 or B8 uses which would be willing to operate from lower grade land. Land also has an identified requirement for a waste processing facility which would be a use consistent with the quality of this site and much of the surrounding employment area.
EET2/2	Lower Mill Field (North), Pontymoile	0.84	Yes	The site should be retained for employment use. Although backland and not of very high value, overall site represents a reasonable infill plot in an existing employment area. Site is on the market and would likely suit industrial uses.
EET2/3	Lower Mill Field (South), Pontymoile	0.0	Maybe	Protect as growth option for an existing employment area. However, not to the exclusion of all other options. There is no identified demand for B-Class uses here, at present. Plot could also support roadside uses or indeed sui-generis motor uses. Allocation should allow some flexibility to allow the site to respond to changing market demand.
EET2/4	Land South of Travelodge, Pontymoile	0.0	No	Consider for alternative uses. Prominent but constrained site, development for offices could be possible but challenging and there is no evidence of demand for this use here, at this time. Current demand is for roadside uses, which could generate higher values which would allow development. Site's main road position and the existing critical mass of roadside uses, to the north, through which the site would likely be accessed, also favour this alternative use.
EET2/5	Mamhilad Business Park	0.69	Yes	Of the two sites the 0.91 ha Carlisle Brakes plot will be held for the exclusive use of that company and cannot be counted as part of the supply to meet wider needs. The 0.69 ha Ultrapharm plot could be made available to other occupiers in the future. The new development at nearby Usk Vale suggests there is

Policy ID.	Name	Realistic Land Supply, ha	Protect for B-Class use the in the new LDP?	Recommendations
				market demand in this area, for industrial uses at least, and the land could meet future growth needs.
EET2/5	Usk Vale	2.0	Yes	The site should be retained for employment use. It is actively being developed and land in the south east is expected to comprise a further phase of development.
EET3/1	Varteg Road, Garndiffaith	0.0	Maybe	The site should be retained for employment use, but not to the exclusion of all other options. Overall a low value employment site, but one which has met some local needs in the past and may do so again. Any proposals for non B-Class employment uses, which may deliver superior economic value to this area, should be considered on their merits.
EET3/2	Gilchrist Thomas Industrial Estate	0.55	Yes	The site should be retained for employment use. Moderate quality but still useful expansion land for a well-established local industrial estate. The Council-owned land could either meet the growth needs of adjoining major employers or provide opportunities to deliver new micro business space.
EET3/3	Land at Kays & Kears Industrial Estate	6.0	Yes	The site should be retained for employment use. Key site for the north of the County Borough, held by an owner who is actively working to deliver B-Class uses on the site, along with infrastructure investment.
EET4/1	Craig y Felin	10.0	Yes	Review scale and nature of the allocation. Regional scale site which has attracted major requirements in the past, albeit infrequently and sometimes for non B-Class uses. Evidence is the landowner does not support the larger B2/B8 uses which are most likely to be delivered here and is seeking housing on the site. Given the scale of the site, and the fact that Torfaen is losing its other Regional Employment Allocation (EET4/2: Former Ty Coch Tip, Cwmbran), a full change of use to residential (or other non B-Class) uses should be resisted. However, given the scale of Torfaen's identified needs to 2033, scope exists for a compromise position, with a mixed-use development at Craig Y Felin. Such a mixed-use option would identify that the site is still needed for employment uses, but recognise that higher value uses (housing, other non B-Class uses) are needed to generate value to support the delivery of the employment element and open up the site. It is hoped such a compromise would encourage the owner to release land for development and give a more deliverable site. Given that the non B-Class uses would likely be delivered first, to generate value to open up the site for development, any consent for a mixed-use scheme would need to include sufficient safeguards to ensure the B-Class uses were delivered in an appropriate timeframe.
EET4/2	Former Ty Coch Tip, Cwmbran Drive and Hollybush Way	0.0	No	Do not retain as employment site in the emerging LDP. Despite some market interest, site constraints appear to render the vast majority of the site undevelopable for traditional B-Class uses. Site owners are putting forward options for infrastructure and leisure which appear, at least in in terms of the Solar Farm element, more deliverable
SAA1	Eastern Strip Strategic Action Area	0.46	Yes	Mixed use scheme. Protect the remaining B1 element. Consented scheme includes a B1 office on 0.46 ha of land. That office element is marketed and driven forward by Welsh Government, who are in negotiations with the County Borough Council for a 3,000 sqm scheme of grow-on accommodation for companies leaving the Springboard Centre. Thus, the chances of delivery remain good.
SAA3	Llantarnam Strategic Action Area	6.97	Yes	Review and plan for the delivery of land here. The three plots are well located on the edge of Llantarnam Industrial Park, although their deliverability is presently constrained by the narrow road access of Ty Coch Road. Addressing this, i.e. through the proposal consented in App 12/P/00288, will be key to making these plots deliverable. Access constraints may, in part, explain the lack of market interest to date. However, sites are also owned by a housing association which, as evidenced by its Candidate Sites submission, wishes to see the land developed for housing and (regardless of whether the Planning Condition for 18 months of active marketing has been met) is not strongly motivated to release the sites for B-Class uses. However, given the likely immediate take up of Llantarnam Park Sites A and B (EET1/2 and 1/3) for the Police HQ and the apparent undevelopability of EET4/2 Former Ty Coch Tip, the land supply in the Llantarnam/south Cwmbran area is increasingly limited. Thus, the additional loss of these sites is difficult to support as it would leave Llantarnam with only 1.4 ha of remaining development land. Although there are

Policy ID.	Name	Realistic Land Supply, ha	Protect for B-Class use the in the new LDP?	Recommendations
				limits to what the Council can push the landowners/developers to undertake, the preferred option would be for the Council would be to push for the delivery of the access improvements consented in App 12/P/00288 and ask that the land be marketed again, to a higher standard and with the better access in place.
		30.72		

Source: BE Group, 2019

xxviii. Table ES3 provides Area specific recommendations:

Table ES3 – Existing Employment Area Recommendations

Name	Size, ha	Recommendations (Safeguarding Yes/No/Maybe) Recommended Area Categorisation
Area 1: Ardep	0.65	Low value single building, largely not in B-Class use. Location is of limited economic value and protection is not a priority. (No) Neighbourhood Employment Sites
Area 2: Avondale Industrial Estate	15.33	Avondale Industrial state is a large site with some vacant land within. It is, however, surrounded by predominantly residential areas and therefore future growth may be restricted. The current estate is reasonably well occupied, with a strong property offer which should be protected. (Yes) Secondary Employment Sites
Area 3: Burtons	4.74	Facility for a major local employer which should be protected in the LDP. If the buildings became vacant, significant efforts to market the property for B2/B8 uses should be made, to meet strong local demand for larger units, before redevelopment or a new use was considered (Yes) Major Employment Sites
Area 4: Chapel Lane	2.57	Small, isolated and partly derelict site of modest economic value. Its protection for B-Class uses should not be considered a priority. (No) Neighbourhood Employment Sites
Area 5: Court Road Industrial Estate	11.53	Key local industrial estate. Overall, protect in the LDP. Some land in the north of the estate, at the junction of Court Road and Llantarnam Road, could be proposed for affordable housing in the Replacement LDP. This land comprises unused/underused hardstanding, some car parking and a small cafe. Other car parking would separate the housing from industrial operations. Its redevelopment, for housing, would have little impact on the operation of the wider industrial estate and could be progressed, subject to other planning issues. (Yes) Secondary Employment Sites
Area 6: Eastern Strip	13.99	Facilities for major local employers which should be protected in the LDP. If the buildings became vacant, significant efforts to market the property for B2/B8 uses should be made, to meet strong local demand for larger units, before redevelopment or a new use was considered. (Yes) Major Employment Sites
Area 7: Forgehammer Industrial Estate	2.98	The Estate falls into the Canalside Strategic Action Area which is proposed for housing and canal side uses. Generally, this is a low quality employment area although it continues to meet some local needs for budget space. The location should be protected, but not to the exclusion of alternative uses which would give superior economic and community benefits. (Maybe) Neighbourhood Employment Sites

Name	Size, ha	Recommendations (Safeguarding Yes/No/Maybe) Recommended Area Categorisation
Area 8: Forgeside Industrial Estate	1.02	The Estate falls into the Canalside Strategic Action Area which is proposed for housing and canal side uses. Generally, this is a low quality employment area although it continues to meet some local needs for budget space. The location should be protected, but not to the exclusion of alternative uses which would give superior economic and community benefits. (Maybe) Neighbourhood Employment Sites
Area 9: Grange Industrial Estate	2.72	Low quality but well used local industrial estate, protect in the LDP. (Yes) Key Local Employment Sites
Area 10: Hill Street	2.98	Popular local industrial estate, of reasonable quality. Protect in the LDP. (Yes) Key Local Employment Sites
Area 11: Knauf Insulation	12.44	Facilities for a major employer, protect in the LDP. If the buildings became vacant, significant efforts to market the property for B2/B8 uses should be made, to meet strong local demand for larger units, before redevelopment or a new use was considered. (Yes) Major Employment Sites
Area 12: Llantarnam IE	67.35	High quality, strategic employment area. Protect strongly in the LDP. (Yes) Major Employment Sites
Area 13: Oldbury	6.42	Locally successful employment area, protect in the LDP. (Yes) Key Local Employment Sites
Area 14: Somerset Industrial Estate	7.09	Reasonable quality, highly accessible local industrial estate. Some land could be lost to A1 retail, subject to planning, the rest should be protected in the LDP. (Yes) Secondary Employment Sites
Area 15: Springvale	24.07	Successful local industrial estate, protect in the LDP. (Yes) Secondary Employment Sites
Area 16: Station Road, Afon Terrace	4.03	Moderate quality, but still active employment area. Protect in the LDP. (Yes) Key Local Employment Sites

Name	Size, ha	Recommendations (Safeguarding Yes/No/Maybe) Recommended Area Categorisation
Area 17: Two Locks	0.26	Occupied premises which could be protected in the LDP, but not to the exclusion of options which would deliver stronger economic or community value. (Maybe) Neighbourhood Employment Sites
Area 18: Ty Coch, Ty Coch Way	21.76	Overall, a well-established and high quality industrial estate with a property offer which can compete for wider inward investment. It should be strongly protected in the Replacement LDP. It is understood that Festive Products is seeking to relocate to a new facility of some 12,000 sqm and seek to redevelop the existing site. Such a proposal needs to be considered on its merits. The estate should continue to be strongly protected as Ty Coch remains a key employment area for Torfaen (Yes) Major Employment Sites
Area 19: Cwmavon Brewery	0.75	In strictly economic terms, the site is of limited value. Rather the value is in the historic nature of the buildings. A broader range of uses, appropriate to the locations and listed status, could thus be considered to allow these buildings to be brought back into high value use. (Maybe) Neighbourhood Employment Sites
Area 20: Forgeside (Doncasters)	8.46	Facility for a major local employer which should be protected in the LDP. If the buildings became vacant, significant efforts to market the property for B2/B8 uses should be made, to meet strong local demand for larger units, before redevelopment or a new use was considered. (Yes) Neighbourhood Employment Sites
Area 21: Gilchrist Thomas Industrial Estate	15.41	The more dated buildings may need refurbishment in the future, however, the site should be retained for its current uses. (Yes) Secondary Employment Sites
Area 22: Kays and Kears	3.61	There is room for development on the west side of the site and plans for growth are being actively progressed. The current buildings are in a good state of repair and it should be retained for its current uses. (Yes) Secondary Employment Sites
Area 23: Steadmans Yard	1.10	Low value, small employment site in a residential area. It is of limited value to the local economy and it is not recommended that it be protected in the LDP. (No) Neighbourhood Employment Sites
Area 24: Abersychan Industrial estate	0.81	Small, but successful and well occupied local industrial estate. Protect in the LDP. (Yes) Key Local Employment Sites
Area 25: Limekiln Road	0.13	Low value, small group of employment premises, many in non B-Class use. Its protection in the LDP, for B-Class use, would be a low priority. (No) Neighbourhood Employment Sites
Area 26: Lower Mill North	4.35	Good quality offices and a warehouse, in active use at a key road junction. Protect in the LDP. (Yes) Secondary Employment Sites

Name	Size, ha	Recommendations (Safeguarding Yes/No/Maybe) Recommended Area Categorisation
Area 27: Mamilhad Business Park	6.20	Small but good quality business area with room for expansion. The location should be protected in the LDP. (Yes) Secondary Employment Sites
Area 28: Mamilhad Park	27.58	Overall, this is a successful business park, of sub-regional scale which should be protected in the Replacement LDP. Policy SAA4 Mamilhad Strategic Action Area allocated the wider area including land to the south for a new community including up to 1,700 dwellings (690 in the LDP Period). The current masterplan for the site, the subject of an underdetermined planning application would see approximately 22 hectares of residential development providing up to 900 dwellings, alongside a school and neighbourhood centre. In terms of employment the masterplan would see retained the office buildings of Caerleon House and Mamilhad House for employment along with the front section of Brecon House. Around 60 percent of the Nylon Spinners factory will be refurbished and retained for existing and new employment uses. From an employment perspective, Mamilhad Park Estate is a significant asset for the County Borough supporting 1,800 jobs and 150 businesses. Torfaen does not have the available space to relocate even a quarter of these businesses locally (neither do neighbouring authorities) and so the priority should be to protect as much of the business space, for B Class uses, as possible. The current masterplan would see the larger buildings on the site protected for B Class uses and it is recommended that the Council ensure that the employment provision in any new scheme does not fall below this level (Yes) Secondary Employment Sites
Area 29: Panteg	1.34	Successful local industrial estate, meeting local business needs. Protect in the LDP. (Yes) Key Local Employment Sites
Area 30: Polo Grounds	19.85	Location continues to have a function, supporting bad neighbour uses which might struggle to find space elsewhere. Protect in the LDP. (Yes) Key Local Employment Sites
Area 31: Pontnewynydd	7.77	Active and successful local industrial estate, protect in the LDP. (Yes) Key Local Employment Sites
Area 32: Pontyfelin	27.15	Site is home to several major employers for Torfaen and is a key source of larger industrial and warehouse premises, which can compete for inward investment in regional and national markets. The area should be strongly protected in the LDP. It is understood that the presently vacant building has been submitted as a candidate site for housing. Given the limited supply of larger industrial and warehouse units in the County Borough, both to allow local firms to grow and to support inward investment, particularly in Pontypool, it is not recommended that any large units be lost from the supply here. (Yes) Major Employment Sites
Area 33: Skew Fields	5.28	Active employment site, home to several major employers. Protect in the LDP. (Yes) Secondary Employment Sites
Area 34: South Pontypool Industrial Estate	8.83	Active local industrial estate in full use, protect in the LDP. (Yes) Key Local Employment Sites

Name	Size, ha	Recommendations (Safeguarding Yes/No/Maybe) Recommended Area Categorisation
Area 35: The Gwenalt	1.87	Low quality employment area. Site is in use and meeting some needs for vehicle facilities, with extensive parking, which could not be met elsewhere. Based on this, protect in the LDP, but not to the exclusion of options which may generate superior economic value. (Maybe) Neighbourhood Employment Sites
Area 36: The Pavilions	0.87	Reasonable quality premises, but mostly in Non B-Class use in a residential area. The location functions as a location for Sui Generis and retail-based services, not as an industrial estate/business park. It does not require protection in the LDP. (No) Neighbourhood Employment Sites

Source: BE Group, 2019

- Within the Major Employment Sites, non B-Class employment uses should not normally be permitted, unless a clear viability case can be made.
- For the Secondary/Key Local/Neighbourhood Employment Sites, a more flexible approach could be taken to help facilitate a broad range of economic development. In some cases, a more intensive mixed-use development could provide greater benefit to the local community than if the site was retained solely in employment use. Subordinate complementary or supporting uses could be permitted where a vitality and viability case can be made.
- Employment development outside the identified Employment Areas contributes to local employment activity and jobs. Any consideration of future non-employment changes of use, in such locations, should be addressed in the same way as land in Secondary-Neighbourhood Employment Sites.
- Protect at least 10 ha of EET4/1: Craig y Felin to meet market requirements for larger industrial units.
- TAN23 requires that sites should be fit for purpose and this means that they need to be deliverable. To achieve this, it is recommended that the Council and other relevant partners:
 - Work proactively with Welsh Government
 - Develop Delivery Strategies for Sites.
- The Council should work with neighbouring authorities on issues in which interests will overlap.
- Review and monitor the employment land and premises position and undertake this study again as part of the future Plan reviews, as 2033 is a long time in the future and much will happen before then
