Further submission from Gwynedd County Councillor Mike Stevens ID 406 Objection Number 631 11 August 2016

The Deposit Plan 2015 is not sound as the methodology used in Topic Paper 5 May 2013 which it is derived from is flawed. This is clear from figures used in the scoring system which underscores Tywyn which is designated as a Local Service Centre in comparison with Blaenau Ffestiniog, Porthmadog, and Pwllheli which are designated Urban Service Centres. The conclusions are not evidence based as can be seen from the examples below.

See Topic paper 5: Developing the Settlement Strategy, pages 58, 62, 63, 69, 73, 74

Petrol Stations Tywyn receives 0 points when it had two which was equal to Porthmadog which received 2 points.

Cinema/Theatre Tywyn receives 0 points when it has one of the most up to date digital cinemas in Wales. In addition the recently refurbished Neuadd Pendre has live performance from prestigious West End artists. Porthmadog receives 1 point despite the fact their cinema was closed and has since been demolished.

Places of Worship Tywyn receives 2 points which is 1 point less than Porthmadog and Blaenau Ffestiniog. Given the fact Tywyn has eight places of worship (see appendix "A") it is questionable if those towns have significantly more to receive the extra point.

Public Houses Tywyn receives 2 points which is 1 point les than Porthmadog, Blaenau Ffestiniog and Pwllheli. Again given the fact Tywyn has three public house, 2 social clubs, and a wine bar (see appendix "B") it is again questionable if those other towns have significantly more to receive the extra point.

Doctors Surgery Tywyn receives 3 points which is 3 points less than Porthmadog and Blaenau Ffestiniog. When the paper was compiled Tywyn had a large health centre with four doctors two triage nurses and numerous clinics. These services have now relocated to the newly built 15 bed extension of Tywyn hospital. Again it is questionable if these other towns have significantly more medical services to justify 3 extra points difference. NOTE on 12 November 2015 I telephoned the Joint Planning Policy Unit to ask had they visited Tywyn to make this assessment? Their officer said they had not and they had based their information on the Betsi Cadwalader web site?

Dentist. Tywyn receives 3 points which is 3 points less than Porthmadog, Pwllheli and Blaenau Ffestiniog. Can this points difference really be justified?

Summary Statement

The scoring is inaccurate and grossly unfair to the people of Tywyn. With a few adjustments Tywyn achieves a higher points total than the three comparable towns. The conclusions reached are not evidence based but appear to be predetermined in order to justify concentrating development and growth in the north whilst stifling the south of the county. The Joint Planning Policy Unit being based in Bangor has little empathy with south Gwynedd and I doubt during this process that they even bothered to visit Tywyn or the surrounding area?

The Gwynedd Unitary Development Plan 2001-2016 designated Tywyn as a Local Centre. Porthmadog Pwllheli and Blaenau Ffestiniog were designated as Urban Centres and as such the development plan stated they would be "the focus for substantial development" In the intervening ten years Tywyn has been starved of the same level of investment and development that they have received. Despite this Tywyn has forged ahead and even the flawed Topic Paper 5 shows it is equal to and in some instances superior in infrastructure and services to the comparable towns designated as Urban Centres. The question has to be poses, had Tywyn not been stifled and held back had it received the same level of focus, development, investment and been given the same opportunities over the past ten years where would the town be now?

Because of the geography of Gwynedd Tywyn can be described as the "mother" town of the area its position makes a natural location as Urban Centre. The six surrounding villages (attached map A1) of Aberdyfi, Bryncrug, Llanegryn, Abergynolwyn, Rhoslefain and Llwyngwril look to Tywyn as their centre for resources such as major shopping needs, hospital, doctors, care homes, banks, legal services, financial services, post office, farming supplies, building supplies, garden centre, secondary school and a thriving enterprise park.

The Deposit Plan 2015 (page 269) states Local Service Centres have **some** employment and retail opportunities"? Tywyn has **excellent** employment and retail opportunities and is the main employment centre for the area. The Plan goes onto say "and very good links with either an Urban Service Centre or the Sub-Regional Centre, whichever is nearest". The nearest to Tywyn is Porthmadog which is an 80 mile round trip which cannot be described as having good links with the south of the county. At this point a mention has to be given to the A487 road which is the main arterial coastal road from north to south Wales. The road has to cross the river Dyfi at Machynlleth over a bridge that was built in the 17th century for donkey carts. It is a notorious pinch point that results in the road being closed due to flooding or damage from large lorry's trying to negotiate the very tight turn on the bridge. This further illustrates how south Gwynedd has been starved of investment. What other European country would allow such a situation to exist in the 21st century?

The Deposit Plan (page 155) allows for up to 55% development in the Urban Centre areas but only 20% in local service centres. There is already an acute housing shortage in Tywyn with a need for affordable housing. Currently there are 107 people on the housing list for Tywyn which is 50% more than for Blaenau Ffestiniog.

There can be no justification for concentrating the majority of development and resources in the north of Gwynedd. There can be no justification for depriving and starving the people of Meirionydd of development and growth. The future hopes and aspirations of people, young families and children in south Gwynedd must be given equal status as those in the north of the County which every sense of equality and fairness would point to. We must offer a vibrant future for our young people and families so they do not feel they are in a declining area and are forced to move away. To that end the largest town, Tywyn must be designated as an Urban Centre to allow for a focus of development, investment and growth to ensure the long term sustainability and viability of the whole area.

These facts demonstrate that the plan is not sound as it does not make adequate provision for development in the south of Gwynedd for the reasons stated. I therefore appeal to the Inspectors to re-designate Tywyn in the Deposit Plan 2015 as an Urban Service Centre equal in status to Porthmadog, Blaenau Ffestiniog and Pwllheli. This will ensure a fair, equal and balanced plan for all the people of Gwynedd.

Appendix "A"

Places of Worship in Tywyn, St Cadfans Church of Wales, St David's Roman Catholic, English Baptist Church, Welsh Presbyterian Chapel, Welsh Methodist Chapel, Capel Bethel, Kingdom Hall Jehovah's Witnesses and Tywyn Spiritualist Church,

Appendix "B"

Public House in Tywyn, The White Hall, The Tredegar Arms, The Victorian Slipway. Other licensed establishments, Tywyn Ex Servicemen Club, Neptune Social Club and Proper Gander Wine Bar. There is also the Corbett Arms Hotel which is currently closed and it is hoped once acquired by new owners will re-open. There are also a number of licensed restaurants in the town

Attached Map A1

Illustrating the geography of Gwynedd and the remoteness of communities in the south from the Sub Regional and Urban centres.

Additional Note. On 18 March 2016 Gwynedd Council held an extraordinary meeting to discuss the Joint Local Development Plan as there was great concern that the plan did not reflect the views and recommendation of Councillors. From all sides of the chamber and from all political groups there was condemnation of the plan. During the debate a number of Councillors who were members of the JLDP committee said their views had been completely ignored. It was felt a majority of the recommendations and view in the Deposit Plan 2015 were those of planning officers who seemed to have a "we know best" attitude. A Councillor made a proposal of "no confidence" in the JLDP however the legal officer Iwan Evans said it could not proceed for legal reasons? I feel the inspectors must be made aware of these facts.

Cllr Mike Stevens

MAP A1

The map clearly illustrates how the Deposit Plan 2015 concentrates all the focus for development and growth in the north of Gwynedd to the detriment of communities in the south.

The map also illustrates the strategic importance of Tywyn to the communities and people of the south of Gwynedd.

