

## **Hearing Session 5**

# **ECONOMY – EMPLOYMENT, RETAIL AND TOURISM**

**9.30 am, Tuesday 13 September 2016**

**Anglesey and Gwynedd Joint Local  
Development Plan**



**CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to the Economy – Employment, Retail and Tourism in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

## Matters and Issues Agenda

### 1 Introduction

### 2 Procedural Matters

#### Employment

**3 Is the overall figure of 638.7ha of safeguarded employment land, with an additional 60ha of allocated land and 144.1ha Reserve Sites (842.8ha total) appropriate to meet the needs of the Counties over the Plan period?**

**a. Is the level of employment land provision fully justified and supported by robust evidence?**

3.1 **Response** - Yes. Please refer to the Background Paper (DC.004) Employment Land Review and Explanatory Note - 'Employment Land Allocations in the emerging JLDP' (DA.016).

3.2 The Council commissioned URS Scott Wilson to undertake an Employment Land Review as a means of providing robust evidence to underpin and inform the supply and demand for employment land and premises within the Local Development Plan. The scope and structure of the Employment Land Study is in line with the recommendations of the guidance commissioned by the Office of the Deputy prime Minister (ODPM) 'Employment Land Reviews: Guidance Note' (2004), which was the available guidance on preparing employment land reviews. The Study is based upon a three stage assessment process, firstly, taking stock of the current situation; secondly, assessing the future requirements; and thirdly, identifying a new portfolio of sites.

3.3 Further justification regarding the employment land provision within the Plan is given within the 'Employment Land Allocations in the Emerging JLDP' Explanatory Note prepared by Amec Foster Wheeler. The Explanatory Note also refines/corrects the figures in terms of the extent of land which is being safeguarded/allocated. Following revising the figures, the Plan safeguards 650.1ha of employment land and allocates 55ha of employment land.

3.4 The Explanatory Note (DA016) confirms that the employment land provision within the Plan (subject to Focus Change) is appropriate for the Plan period on the basis that the Plans approach to the provision of employment land allows for the opportunities arising from prospective National Significant Infrastructure Projects to be realised.

**b. How does the proposed level of employment land provision compare to historic take up rates, past population growth trends and an ageing population?**

3.5 **Response** - The Employment Land Review Background Paper (DC.004, Section 6) details the methodology used to gather information regarding the future requirements of employment land within the Joint Local Development Plan Area. Evidence gathered includes an analysis of market enquiries for land and premises and

forecasted future demand for employment land using econometric modelling and historic take up trend analysis.

- 3.6 The study includes an econometric modelling forecast for each authority. This method of forecasting doesn't take into account the specific circumstances for economic development such as transportation, the availability and nature of sites, local regeneration and job creation initiatives, or locally sensitive or specific demand, for example the growth plans of major local businesses. However, the employment forecasts undertaken at a local level by ESYS Consulting (as part of the Employment Land Review) takes into account a number of these factors including recent developments in economic and financial markets and their implications for employment growth; the possible effects of a double – dip recession; and also Enterprise Zone designation. The method used is therefore considered to be more robust than employment land forecast.
- 3.7 There are risks in planning for future provision based purely on historic take up, the alternative in relying on econometric modelling (best case for Anglesey is 10.9 ha (0.77 ha p.a.) and best case for Gwynedd is 22.2 ha (1.58 ha p.a.) would not meet strategic policy objectives across national/regional and sub regional levels nor would it facilitate delivery of corporate objectives of either authority e.g. Energy Island Programme, Gwynedd Regeneration Strategy, Meirionnydd Employment Plan.
- 3.8 The Plan's Strategy isn't based upon repeating former population growth trends as seen by the Welsh Government population projections. The Plan seeks to create a circumstance where the working age population will increase. There is therefore a synergy between the housing provision and the employment land provision.
- 3.9 The Councils are of the opinion that the Plan doesn't over-provide for employment land given the unique opportunities which are likely to present themselves during the Plan's lifetime. The approach taken is in line with TAN23 (PCC12) which states at paragraph 4.5.2 in section 4 that land provision targets may be higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that opportunities can be realised.

<b>4 Does the spatial distribution of employment land have regard to the Wales Spatial Plan and is it consistent with the overall development strategy proposed through the LDP?</b>
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<b>a. Is the Plan's overall approach to employment growth compatible with the levels of residential development proposed over the Plan period?</b>
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- 4.1 **Response** - Yes. The evidence base includes a robust assessment of the likely additional housing required as a result of the anticipated economic growth within the Plan area. This is set out in Topic Paper 4B – Describing the Housing Growth (2016) (PT.010).
- 4.2 It is clear that a new build at Wylfa and other Anglesey Energy Island Programme investments would mean that the employment situation on Anglesey, Gwynedd and beyond would be greatly enhanced.
- 4.3 In formulating the housing growth provided for within the Plan consideration was given to a number of scenarios. The scenarios identify the potential population and

household growth over the Plan period, as well as the total number of dwellings and the average annual dwelling numbers. The scenarios include:-

- ‘trend’ scenarios based on varying migration assumptions,
- ‘dwelling-led’ scenarios based on growth in the number of housing units, and
- ‘jobs-led’ scenarios, which are driven by growth in jobs available in the area, linked to the potential transformational changes linked to Wylfa Newydd and other related investments.

- 4.4 Topic Paper 4B provides an overview of the analysis undertaken and is supplemented by a post submission explanatory note (Employment Land Allocations in the Emerging JLDP’ – DA.016). The preferred housing growth of 7,184 (excluding 10% slippage) over the Plan period is considered to be able to satisfy the trend based need for housing within the Plan period whilst allowing sufficient number to support future economic growth aspirations. The housing growth is therefore based on a combination of housing-led and employment led growth scenario.
- 4.5 Economic growth generates wealth and raises living standards and is driven by an increase in employment and productivity. This in turn enables households to purchase products, which includes housing. Lowering of housing provision could result in a failure to deliver the Plan’s objectives. It could require a lowering of employment land provision. It could promote a commuter population as opposed to sustainable local communities.
- 4.6 Therefore, the Councils consider that there is a clear correlation between the levels of housing growth and employment growth

<b>b. How are the economic and residential strategies aligned?</b>
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- 4.7 **Response** - In formulating the Plan, regard was given to PPW, which requires a joined up approach to housing and employment and encourages development plans to align economic and housing strategies (para 7.1.3 of Planning Policy Wales, Edition 8, 2016) (PCC.09).
- 4.8 The Plan’s Spatial Strategy sets out a settlement hierarchy which lists the towns, villages and clusters and specifies the role/function of the settlement and the anticipated growth level within each category. Topic Paper 5A Developing the Settlement Hierarchy (PT.012) sets out the approach to categorising the individual settlements. The Sub-Regional Centre and Urban/Local Service Centres are the most sustainable settlements in terms of providing a range of facilities and services, which address the needs of their own population as well as a network of other settlements.
- 4.9 Figure 1 and Figure 2 within the ‘Employment Land Allocations Within the Emerging JLDP’ Explanatory Note (Amec Foster Wheeler) (DA.016) demonstrates that the amount of employment land when averaged out against the different settlement categories matches the spatial strategy, suggesting that employment development will take place in close proximity to local workforce.
- 4.10 The Plan’s strategy focusses upon providing key development opportunities in the sustainable settlements as identified within the Plan. 75% of the proposed housing growth within the Plan area is located within the Sub-regional Centre and Urban/Local Service Centre. These are the location of most of the

safeguarded/allocated employment sites. The correlation of housing and employment growth is therefore an indication of the alignment of the growth strategies.

- 4.11 In terms of the WSP coverage the Plan area is split between two spatial plan areas namely: North West Wales Eryri and Mon and Central Wales, each of which include variations in approach in defining their respective hierarchies. The Plan has closely aligned the higher levels of its settlement hierarchy with that of the WSP.

<b>c. Is the hierarchy of employment sites appropriate? Is the Plan's approach to employment land provision in rural areas consistent with Planning Policy Wales, Technical Advice Note 6 and Technical Advice Note 23?</b>
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- 4.12 **Response** - The hierarchy of employment sites is divided into prime and secondary tiers, further guidance regarding the hierarchy of employment land is given in para 10.3 of Background Paper (DC.004) Employment Land Review. Prime sites are those that are considered to be most attractive using market criteria and are more likely to be developed in the short term. Secondary sites may be in slightly more inferior locations in terms of access/market presence compared with prime sites but they retain an important role as they represent opportunity, especially in relation to the Energy Island Programme along with the need to serve a more local need in more remote rural areas. It is therefore considered that the hierarchy of employment land provides a balanced portfolio of land which addresses the employment needs and opportunities of the area and which aligns with the economic and spatial strategy of the Plan.

- 4.13 TAN23 (PCC.012) advocates economic development within rural areas as a means of creating more sustainable rural communities where people can live and work. It also recognises that some established rural business may require expansion or modernisation in-situ, due to limitations relating to relocation of the business. The principles of TAN23 are further echoed in TAN6 – 'Planning for Sustainable Rural Communities' which notes that Planning Authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local prosperity and minimise the need to travel for employment. Therefore, in line with national planning policy and guidance, Policy CYF 5 within the Plan advocates economic development within rural areas. The Policy allows for the conversion of rural buildings for business use or modification of residential units to allow working from home. The Policy also allows for new business/industrial units, provided that the proposal conforms with the criteria based policy. It is therefore considered that the Plan's approach to employment land provision in rural areas is fully consistent with National Policy Guidance.

<b>d. Is the Plan's employment land strategy compatible with the emerging strategies of neighbouring authorities, for example, the potential influence of Trawsfynydd and Llanbedr Airfield?</b>
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- 4.14 **Response** - This is a joint local development plan and therefore represents close collaboration between the Isle of Anglesey County Council and Gwynedd Council. The Snowdonia National Park Authority occupies part of Gwynedd in land terms, however, that area is covered by its respective LDP. The Gwynedd Local Planning Authority adjoins 4 other local planning authority areas: Conwy County Borough Council, Denbighshire County Council, Powys County Council and Ceredigion County Council. The Councils have had regular contact with neighbouring authorities

both individually (particularly Snowdonia National Park Authority) and collectively at regional level (through the North Wales Planning Policy Officers Group).

- 4.15 Where relevant the Councils have engaged with neighbouring authorities to ensure cross boundary compatibility and/ or continuity. Discussions at the Eryri pre-Deposit stage ensured a consistent approach as far as is reasonably possible, which is replicated in the Joint LDP. Therefore, it is considered that constructive discussions between Councils/ Authorities and sharing of information and experience has minimised the risk of conflicting policies and ensured an appropriate level of integration.
- 4.16 In addition to the above, neighbouring local authorities have been regularly consulted at all stages in the Plan preparation process, which provided a formal opportunity to comment on the emerging Plan and influence its development.
- 4.17 Further the Employment Land Review (Background Paper DC.004) has considered the impact of potential influences (outside the Plan area) with particular consideration given to Llanbedr Airfield and the decommissioning of Trawsfynydd (for example).
- 4.18 An Assessment of Employment Land – Background Paper is in the process of being prepared by the Snowdonia National Park Authority, the purpose of the document is to inform the review of the Eryri Local Development Plan, and to a lesser extent, the National Park Management Plan. The paper highlights the importance of the Snowdonia Enterprise Zone designation. The Snowdonia Enterprise Zone which includes the former nuclear power station site at Trawsfynydd and the former airfield site at Llanbedr has the potential to create new quality job opportunities. The aim for the Trawsfynydd site is to become a hub for innovative low carbon technology enterprises and associated Research & Development and for ICT/Digital Enterprises. A development Masterplan has been produced for Llanbedr Airfield which identifies new development areas. The current operators of the site foresee the potential for further development of testing unmanned aerial vehicle systems and invested in the facilities at the site to cater for this expansion. This will allow modest employment growth at the site but many of the technical jobs required for testing will be temporary in nature and restricted to testing periods.
- 4.19 The Employment Land Review also highlights the need to work collaboratively as North Wales Authorities as a means of providing a stronger voice to gain inward financial investment. Since preparing the Background Paper, North Wales Planning Authorities along with Economic Development sections have worked collaboratively to prepare the Regional Employment Land Strategy for North Wales, referred to in the Explanatory Note 'Employment Land Allocations in the Emerging JLDP' (DA.016). The need for the strategy emerged through research undertaken by the North Wales Economic Ambitions Board and follows the publication of 'North Wales Economic Ambition: A Strategy for Change'. The commission builds upon the short term priorities identified in the strategy for change which recognises inward investment and enterprise as two key economic drivers. In achieving these priorities the strategy recognises the need for a new protocol for joint working in these areas of economic development; ensuring that all investment leads and decisions are dealt with in a coordinated and holistic manner. Central to this is the need to understand the role and function of strategic employment sites across the region and planning clear investment priorities to ensure adequate employment sites. Some of the safeguarded and allocated sites within the Plan (Policy CYF1) are recognised within the Hierarchy of Strategic Employment Sites, the status of the sites within the North Wales Employment Land study has been specified within the table in Policy CYF1. The sites

within the Plan area have been categorised as either strategic sites of regional importance (meaning that they have a critical role in achieving regional and contributing to national economic development) or strategic sub-regional sites (meaning that they have a more general and localised focus for economic development).

- 4.20 Therefore, the Councils consider that the Plan's employment strategy is compatible with strategies of adjoining authorities, both current and emerging.

**5 Do the safeguarded and allocated sites meet the different economic and employment needs of the area and how deliverable are they over the Plan period?**

**a. Are the safeguarded sites and allocations realistic and economically viable?**

5.1 **Response** - Yes. The identification of employment sites reflects the findings of the Employment Land Review (Background Paper DC.004) which considers that the employment land supply and allocations as set out in the Plan are consistent with the areas of demand for employment land.

5.2 Gathering a funding mechanism for delivery of the sites is a crucial factor for delivery. Over recent years there has been a lack of private sector investment in the area, however, it is anticipated that further investment will be achieved through funding programmes connected to the Anglesey Energy Island programme and Wylfa Newydd. In terms of delivery, measures are underway to secure EU funding through the North Wales Economic Ambitions Board (NWEAB) collaboration and sites being identified and endorsed as strategically important to the wider Energy Island Programme.

5.3 As part of the Enterprise Zone designation which has been afforded to some of the allocations/safeguarded sites there will be a suite of finance packages available to kick start development along with the availability of support and incentive packages. Explanatory Note - 'Employment Land Allocations in the emerging JLDP' (DA.00?) also highlights the investment opportunities which are likely to arise from the Enterprise Zone designation given the availability of enhanced Capital Allowance.

**b. Are there any constraints that could have an effect on the deliverability of sites over the Plan period?**

5.4 **Response** - The Employment Land (DC.004) assesses the constraints to development of the proposed allocations. These are set out in 9.1 & 9.2 along with Appendix 3 of the Employment Land Review.

5.5 There are some on site issues relating to some of the sites in terms of the need for improved access or on-site infrastructure. These however are deemed to be standard development costs. For the allocated employment sites the 'Deliverability of Sites' Topic Paper (DA015) gives further details regarding the infrastructure requirement of allocated sites.

5.6 Delivery of some the sites is largely dependent upon the Wylfa Newydd and development relating to the Energy Island Programme being realised.

**c. What are the timescale for anticipated delivery?**



- 5.7 **Response** - The Employment Land Review (Background Paper, DC.004) makes a judgement on the realistic timescale for redevelopment of each of the sites for employment uses (0-5 years, 5-10 years or 10-15 years). In general, those sites that scored highest were judged to be deliverable in the short term and those that scored lowest (and had significant delivery constraints), in the long term.
- 5.8 In terms of the sites which are likely to be required to address the requirements associated with Wylfa Newydd or other elements of the Energy Island programme, it is likely that those site won't be brought forward until there is greater certainty regarding the development of Wylfa Newydd. The DCO application is due to be submitted in 2017 with the peak construction period anticipated for 2022/2023.

**6 How does the employment land strategy relate to the Anglesey Energy Island programme? What would trigger the release of the land designated as 'reserve sites' for the Anglesey Energy Island programme and what mechanisms would be in place to resist these sites being developed early in the Plan period?**

- 6.1 **Response:** The Anglesey Energy Island Programme is a collective effort between several stakeholders within the public and private sector working in partnership to put Anglesey at the forefront of energy research and development, production and servicing, bringing with it potentially huge economic rewards.
- 6.2 There are currently a number of private sector developers proposing to develop low carbon renewable major energy projects on Anglesey. The Isle of Anglesey County Council see the development of these major projects as key in transforming the Island's economy for the future and providing a sustainable long-term high quality of life for Anglesey's residents.
- 6.3 Currently, the two most prominent projects being proposed are the Nuclear New Build at Wylfa and National Grid North Wales Grid Connection, which are referred to as Nationally Significant Infrastructure Projects (NSIPs).
- 6.4 It is imperative that the Plan can accommodate for developments along with any foreseen associated and supply chain developments relating to the Energy Island Programme and the allocated sites reflect a degree of flexibility in relation to the site selection process. The Plan allocates three sites specifically as reserve sites relating to the Energy Island Programme. As stated in in Policy CYF1 before consideration can be given to releasing these lands for employment purposes, need would have to be demonstrated, along with evidence that the proposed development on the site is directly related to realising the objectives of the Energy Island Programme and that there are no other suitable safeguarded/allocated employment sites that could meet this need.

**7 Does the Plan incorporate robust monitoring and review mechanisms that would enable the economic and employment strategy to respond effectively to changing circumstances?**

- 7.1 **Response:** The Plan will be underpinned by a robust Monitoring Framework which will be used to monitor the implementation of policies and proposals contained in the Plan. This will directly feed into the Annual Monitoring Report (AMR) and, in turn be used to inform any future Plan reviews.

- 7.2 Targets, indicators and trigger points have been set out in the revised monitoring framework (DA.010c) which aims to provide a mechanism for ensuring the proposed sites come forward as planned. The Councils are prepared to make minor changes to the Monitoring Framework to ensure it provides the best possible mechanism to monitor and take advantage of evolving best practice as incorporated in recently adopted Plans.
- 7.3 If particular targets are not met, trigger points will be activated and investigated in the Annual Monitoring Report to establish whether any further actions are required e.g. revision of policies or a review of the LDP.

## 8 Any other matters

### Retail

#### 9.0 Is the Plan's Retail Strategy consistent with the vision and objectives of the Plan and the overall development strategy?

- 9.1 **Response** - Yes. The Retail Strategy is considered to be consistent with the vision and objectives of the Plan and the overall development strategy. The Plan's vision seeks to foster vibrant and lively communities that celebrate their unique culture, heritage and environment and being places where people chose to live work and visit ((paragraph 5.6 of the Deposit Plan 2015). The vision provides a brief description of the Councils aspirations for the future roles of named towns and un-named villages and clusters that includes reference to their retailing function.
- 9.2 The Retail Study (2013) undertaken to inform the Plan identified the centres within the settlement hierarchy that have significant retail function. The main categories in the retail hierarchy are as follows: Sub-regional, Urban, and Local. The Retail Hierarchy in the Plan is not the same as the Settlement Hierarchy because the Settlement Hierarchy is based on a wider range of factors including demography, education, health, transport, economy, type and scale of existing facilities and services within each community. Appendix 4 of the Plan and Topic Papers 5 and 5A: Developing the Settlement Hierarchy (PT011 and PT012) explain the rationale for the Plan's Settlement Hierarchy in greater detail. The following table highlights the role of the settlements within the retail hierarchy in relation to the Wales Spatial Plan and the spatial Strategy within the Plan:-

Categorisation in Wales Spatial Plan	Categorisation in Deposit Plan's Settlement Hierarchy	Retail Hierarchy
Key settlement of national significant: Bangor	Sub-regional centre: Bangor	Sub-regional Centre: Bangor
Primary Key Settlement: Caernarfon, Porthmadog, Pwllheli, Llangefni, Holyhead	Urban Service Centres: Caernarfon, Porthmadog, Pwllheli, Llangefni, Holyhead, Amlwch, Blaenau Ffestiniog	Urban Retail Centre: Caernarfon, Holyhead, Llangefni, Porthmadog, Pwllheli
Cross-boundary settlement: Penrhyndeudraeth, Blaenau Ffestiniog	These settlements are included in the Local Service Centre and the Urban Service Centre, respectively.	These settlements are included in the Local Service Centre and the Urban Service Centre, respectively.

Key settlement: Bethesda, Llanberis, Nefyn, Tywyn, Abermaw, Beaumaris, Amlwch	Local Service Centres: Llanberis, Nefyn, Tywyn, Abermaw, Beaumaris, Abersoch, Criccieth, Llanrug, Benllech, Bodedern, Cemaes, Gaerwen, Llanfairpwll, Porthaethwy, Pentraeth, Rhosneigr, Y Fali.	Local Retail Centre: Abersoch, Abermaw, Amlwch, Benllech, Bethesda, Beaumaris, Blaenau Ffestiniog, Cemaes Criccieth, Llanberis, Llanfairpwll, Menai Bridge, Nefyn, Penrhyndeudraeth, Penygroes, Rhosneigr, Tywyn, Valley
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**a. Does the retail growth strategy of the Plan take into account the envisaged growth in other sectors, particularly housing and employment?**

- 9.3 **Response** - The Retail Study (2013) was used to inform the Plan. The Study was based on well-established techniques and includes the following three stages, assessment of demand, assessment of supply and assessment of need. Further information about the Study Methodology is set out in pages 13 -26 of the Retail Study undertaken by Applied Planning (DC006). The study took into account population projections and socio-economic profile based on Postal Code Zones. Adjustments have been made to take account of different forms of retailing including catalogue mail order shopping as well as internet shopping. Adjustments have also been made to take account that the effects of tourism expenditure will not be uniform over the whole of the Plan area.
- 9.4 The quantum and distribution of retail growth aligns with the Plan's spatial strategy and the residential and employment growth anticipated during the Plan period.
- 9.5 The Plan's Spatial Strategy sets out a settlement hierarchy, which lists the towns, villages and clusters and specifies the role/function of the settlement and the anticipated growth level within each category. Topic Paper 5A Developing the Settlement Hierarchy (PT.012) sets out the approach to categorising the individual settlements. The Sub-Regional Centre and Urban/Local Service Centres are the most sustainable settlements in terms of providing a range of facilities and services, which address the needs of their own population as well as a network of other settlements. The Sub-Regional and Urban Service Centres are also described as the Plan's higher order Retail Centres and assigned the majority of retail development in Policy PS 12. This sustainable approach to retail provision seeks to deliver retail to the communities where the most need will be generated and where the most opportunities exist. The Plan responds to the evidence at a point in time and the dynamic nature of the retail market in the Plan area. The Plan includes criteria based Policies that would support proposals for retail provision in line with the Spatial Strategy for the Plan area.

**b. Does Strategic Policy PS12 provide an appropriate hierarchy of retail centres? Will the Plan protect the respective roles of the centres within such a hierarchy?**

- 9.6 **Response** - Yes. Strategic Policy PS12 refers to three main categories in the retail hierarchy as follows: Sub-regional, Urban, and Local centres. Policy PS12 seeks to

resist development that would detract from their vitality and viability and protecting against the loss of retail units within primary Retail Areas as shown on the Proposals Maps. The Policy states that shops and services in Local Retail Centres and smaller villages that provide for the day-to-day needs of communities are safeguarded against their unnecessary loss and proposals for multi-purpose community services are safeguarded.

- 9.6 The approach taken within the JLDP in terms of defining the settlement within the retail hierarchy complies with the current Development Plan framework for both authorities. Further the Retail Study (DC006) has also confirmed the status of the settlements position within the Retail Hierarchy.

**c. Are the boundaries of the town centres correctly defined within the Plan?**

- 9.7 **Response** - Yes. The boundaries have been informed by information collated for the Gwynedd and Anglesey Retail Study 2013 (DC006). Maps are included in the report that provide clear advice to the Councils about the extent of the shopping areas within each Centre. Part 3 of the report provides clear advice about the extent of the primary shopping area, that is, the retail core where there is a high concentration of retail uses. The rest of the retail area (within the town centre boundary) is relatively more dispersed in terms of the retail function and includes a variety of land uses that are common to town centres.

**10.0 Is the Plan's Retail Strategy founded on a robust, credible and up to date evidence base and is it consistent with national Policy, including that set out in Planning Policy Wales (PPW) and Technical Advice Note 4: Retail?**

- 10.1 **Response** - Yes. National policy guidance was an important consideration when forming the retail policies within the JLDP. The retail policies within the Plan are also based upon the Retail Study (DC006). The study provides comprehensive information on shopping patterns for both convenience and comparison shopping across the Plan area, dividing the area into zones and giving a clear indication of quantitative and qualitative need.

- 10.2 Planning Policy Wales (PPW) (paragraph 10.2.1) refers to the need for development plans to establish a hierarchy of centres and identify the retail settlements which fulfil a specific function, the principles included within PPW are further supported by TAN4:-

*“Development plans should establish the existing hierarchy of centres, identify those which fulfil specialist functions and be clear about their future roles. Development plans should also identify changing pressures and opportunities and devise appropriate responses to them. In some situations it may be necessary to take pro-active steps to identify town or city centre locations for expansion. In others it may be necessary to identify measures to reinvigorate centres, or to manage decline in the relative importance of a centre as other centres expand. Dealing with change may mean redefining the boundaries of centres (and see 10.2.11) or identifying acceptable changes of use.”*

- 10.3 The Councils are of the view that that the Plan's Retail Strategy is based on robust, credible and up-to-date evidence and is consistent with PPW and TAN4 Retail. In

formulating the Plan's Retail Strategy account has also been taken to information within Topic Paper 7 Retail (PT014).

**a. Is the Background Paper entitled 'Gwynedd and Anglesey Retail Study' (2013) sufficiently robust and up to date to inform the Plan's Retail Strategy?**

10.4 **Response** - Yes. Please see the Council's response to Question 10 above. Given the nature of retailing in the Plan area and the location of other retail centres outside the Plan area, it is considered that the findings of the 2013 Retail Study (DC006) and its conclusions remain valid and relevant for the Plan.

10.5 The Plan will be underpinned by a robust Monitoring Framework that will be used to monitor the implementation of policies and proposals contained in the Plan. This will directly feed into the Annual Monitoring Report (AMR) and, in turn be used to inform any future Plan reviews. The Councils are prepared to make minor changes to the Monitoring Framework to ensure it provides the best possible mechanism to monitor and take advantage of evolving best practice as incorporated in recently adopted Plans. The Plan will be due for review in 2021.

**b. Are the provisions of Strategic Policy PS12 consistent with the recommendations of the Retail Study'.**

10.5 **Response** - Yes, the provisions of Strategic Policy PS12 are considered to be consistent with the recommendations of the Retail Study.

**11.0 Does Policy MAN2: Primary Retail Areas (Retail Core) provide an appropriate level of protection and flexibility to effectively manage the Urban Retail Centres identified in the retail hierarchy?**

**a. What is the strategy for protecting retail uses within the non primary shopping areas i.e. secondary areas?**

11.1 **Response** - The Plan identifies town centres which include primary shopping areas. By default the area within the town centre that is outside the defined boundary of the primary shopping areas is regarded as the secondary areas. The protection afforded to retail areas within the town centre is introduced in Policy PS12 and Policy MAN1. The aim of both policies is to support existing centres and to ensure that retail proposals are directed towards the town centre provided that the development conforms with the criteria included within the policy.

11.2 Planning Policy Wales encourages mixed use town centre developments paragraph 10.2.4 states as follows:-

*"10.2.4 Although retailing should continue to underpin town, district, local and village centres it is only one of the factors which contribute towards their well-being. Policies should encourage a diversity of uses in centres. Mixed use developments, for example combining retailing with entertainment, restaurants and housing, should be encouraged so as to promote lively centres as well as to reduce the need to travel to visit a range of facilities. Leisure uses can benefit town and district centres and with adequate attention to safeguarding amenities can contribute to a successful evening economy."*

- 11.3 Criteria 1 of Strategic Policy PS12 – Town Centre and Retail Developments encourages mixed use town centre developments in accordance with the guidance given in Planning Policy Wales and TAN4. Upon reflection, it is deemed necessary to amend the wording of Policy MAN1 through a proposed Matters of Arising Change. The proposed amendment will reflect the fact that proposals to change the use of an existing town centre use (retail/leisure) outside the Primary Shopping Area should be scrutinised in order to ensure that the Town Centres retain their vibrancy and viability. The proposed amended wording to Policy MAN1 is as follows:-

**“Proposals that would lead to the loss of existing retail/leisure use (as defined by PPW) outside of the Primary Retail Area but within the defined town centre will be resisted unless it can be demonstrated that:-**

- 1. The existing use is inappropriate or surplus to requirements, and**
- 2. There is clear evidence that the current use has ceased to be financially viable, and**
- 3. No other suitable retail/leisure use can be established, and**
- 4. There is evidence of genuine attempts to market the facility, which have been unsuccessful.**

**Within the Primary Retail Areas, designated in Bangor, Caernarfon, Porthmadog, Pwllheli, Holyhead and Llangefni as shown on the Proposals Map, the change of use of ground floor premises (A1 shops) to any other use will be resisted”**

**b. Should Secondary Retail Areas/Frontages be included on the Proposals Maps?**

- 11.4 **Response** - No. The role of the town centre (as defined by the proposal maps) serves the same purpose as a secondary retail area. Paragraph 10.2.7 of Planning Policy Wales (Edition 8, January 2016) suggests that Development Plans could recognise primary as well as secondary retail frontages stating that secondary retail frontages are areas of mixed commercial development, for example restaurants, banks and financial institutions. By default any area outside the Primary Retail Area that is within the town centre boundary is deemed to be Secondary retail area. It is not therefore deemed necessary to amend the Plan to include the secondary retail frontage as the town centre boundary affords protection to mixed use leisure and retail developments in compliance with Policy PS12 and MAN1.

**c. Should Primary and Secondary areas be extended to Local Retail Centres?**

- 11.5 **Response** - No. As specified within the Retail Study (DC.006), the role of Local Centres is to provide essential services to the local community and the immediate surrounding area. Convenience retailing and services such as chemists, hairdressers, post offices and banks play an important role in Local Centres with the higher order centres providing for most comparison shopping requirements.
- 11.6 The town centre area of local retail centres as defined within the plan include mixed use (retail, leisure and residential). Defining a primary retail area within the local retail centres would be difficult as there is no definitive Primary Retail Area. By defining the town centre area within the local centres it encourages mixed use development, which encourages the viability and vitality of the town centre resulting in accordance with the guidance given in chapter 10 of Planning Policy Wales.

**12.0 Does Policy MAN3: *Retailing Outside Defined Town Centres but Within Development Boundaries* provide an appropriate framework for the consideration of proposals for new retail development outside of those town centres identified within the retail hierarchy?**

**a. Does Policy MAN3 provide an appropriate level of protection for retail uses within such centres whilst also being sufficiently flexible to allow for complementary uses?**

12.1 **Response** - Yes. The criteria contained within Policy MAN3 are considered to be consistent with the sequential test set out in national policy, which requires proposers of new retail developments to demonstrate that consideration has first been given to town centre, then edge of centre locations before an out of centre location is considered. PPW paragraph 10.3.4 states:

“Developers should be able to demonstrate that all potential town centre options, and then edge of centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered for key town centre uses. The onus of proof that more central sites have been thoroughly assessed rests with the developer and, in the case of appeal Welsh Ministers will need to be convinced that this assessment has been undertaken. This approach also requires flexibility and realism from local planning authorities, developers and retailers.”

12.2 Additionally, in considering such proposals, national policy also requires local planning authorities to fully consider the likely cumulative impact of retail proposals on the vitality and viability of existing retail centres:

“For major new retail proposals, local planning authorities should consider not only the incremental effects of that proposal but also the likely cumulative effects of recently completed developments, together with outstanding planning permissions and development plan commitments, in the catchment areas of those centres.”  
(Paragraph 10.3.6 of PPW refers)

**b. Should the policy extend to, or identify, District Centres within the larger settlements?**

12.3 **Response** - No. Some of the larger settlements within the Plan area include smaller scale retail areas, which have not been defined within the Plan. Although these areas have not been defined, policy MAN3 affords them a level of protection by safeguarding the retail use (within the development boundary) unless it can be demonstrated that the criteria as defined within the policy can be met. It therefore is not deemed necessary to identify the district centres within the Plan, as the current policy framework protects the retail uses.

**13.0 Is Policy MAN6: *Retailing in the Countryside* appropriate and is it consistent with national Policy, including that set out in Planning Policy Wales and Technical Advice Note 4: *Retail* and the development strategy of the Plan?**

13.1 **Response** - Section 4 of Planning Policy Wales encourages mixed use development within rural communities (including employment, affordable housing, retail, education and leisure for example as a means of supporting community facilities within rural

areas and the delivery of environmentally sound modernisation. Policy MAN6 conforms with the principles of Planning Policy Wales by providing a set of criteria, which requires compliance when considering proposals for retailing in the countryside. Further TAN6, Planning for Sustainable Rural Communities (2010), para 3.8.2 also supports the principle of appropriate small scale retail developments.

**14.0 Is the Plan's Retail Strategy sufficiently flexible to respond to changing circumstances and does it include clear and appropriate mechanisms for implementation and monitoring?**

14.1 **Response** - Yes. The policies within the Plan have been designed to support the longer term viability of retail provision across both authorities. Within these policies, provision is made to enable change to be managed where this is based on sound and robust evidence. In this regard, the Plan shall provide flexibility in so much as it relates to those changes which are considered to be necessary to enable existing centres to adapt to changing circumstances that will enable them to retain or enhance their vitality and viability as prescribed within national policy.

14.2 In addition, the Plan will be underpinned by a robust monitoring framework, which will be used to monitor the implementation of policies and proposals contained in the Plan. This will directly feed into the Annual Monitoring Report (AMR) and, in turn, will be used to inform any future Plan reviews.

**15 Any other matters**

**Tourism**

**16 Does the Plan, through Strategic Policy PS11 and Policies TWR1 and TWR2 provide an appropriate framework for the consideration of proposals for new or enhanced tourism and leisure facilities and accommodation?**

16.1 **Response** - Yes. As sustainable development is a core principle underpinning planning, Policies PS11, TWR1 and TWR2 aim to encourage the development of high quality sustainable tourism attractions, facilities and accommodation in the right place. The Policies address objective SO13 and supports the tourism objectives and principles of Planning Policy Wales (8<sup>th</sup> Ed, Jan 2016) to encourage sustainable tourism, that is accessible by a wide variety of sustainable means of travel and to manage the tourism sector in ways that minimise the environmental impact. The policies within the plan are aligned with both Anglesey and Gwynedd's Destination Management Plans.

16.2 TWR1 establishes the sustainable locations where new attractions and facilities will be permitted. It states that new attractions and facilities should ideally be located within a development boundary where visitors can access a range of services by a choice of travel. However, the policy also recognises that, in exceptional circumstances, some attractions and facilities require an open countryside, non-urban location which in turn can result in rural employment gain. In the open countryside proposals should first look at previously developed land or underused/redundant buildings in order to protect the countryside from inappropriate development. Further discussion with Horizon Nuclear Power has revealed the possibility that the scope of policy TWR1 could be further clarified. Details of the possible amendment are included in the Statement of Common Ground between the



Isle of Anglesey County Council and Horizon Nuclear Power which will be discussed in Hearing Session 9: Wylfa Newydd.

- 16.3 Policy TWR2 covers a range of both serviced and self-serviced accommodation and also establishes the sustainable locations where new attractions and facilities will be permitted. Policy PS11 and Policy TWR2 recognise that managing the wide range of high quality accommodation is essential in providing visitors with choice.

**17 Does Policy TWR3 achieve an appropriate balance of provision and restraint in relation to existing and proposed development?**

- 17.1 **Response** - Yes, Policy TWR3 does achieve an appropriate balance of provision and restraint in relation to existing and proposed development. The Plan recognises that static caravan and chalet sites are important sources of holiday accommodation within the Plan area. However, the proliferation of static caravan and chalet parks along the coastline, much of which is designated as Areas of Outstanding Natural Beauty (AONB), has had a detrimental effect on the appearance of the landscape. The high number of existing sites on the coastline (as shown in section 4.4 of Topic Paper 9: Tourism, PT.013) means that these areas within the Plan area are already well served by such uses.
- 17.2 The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study (DC.020) was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The cumulative impacts of static caravan and chalet developments within the AONB and along the coastline can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. The Sensitivity and Capacity Study concluded that within the AONBs and Special Landscape Areas (SLAs) (and all areas that contribute to their setting), that there is typically no capacity for further static caravan/chalet park developments or extensions.
- 17.3 This approach is consistent with national planning policy guidance. PPW states that Local Authorities have a duty to protect certain areas of the countryside such as AONBs and undeveloped coastlines (paragraph 11.1.6) unless there is evidence to state otherwise. No compelling evidence was submitted by objectors on this issue.
- 17.4 However, the policy does recognise that the re-location of existing holiday parks located within the AONB and the SLA which are also within the Coastal Change Management Zone can be justified on the basis. Focus Change NF54 also states that existing static and chalet parks that are located within the AONB, SLA and Coastal Change Management Zone may also benefit from a small increase in units in order to facilitate their retention, provided the proposal is supplemented with a business case to justify the increase.
- 17.5 It is also pertinent to note that neighbouring authorities have also taken a similar approach in terms of differentiating between the heavily pressurised coastal areas, AONBs/SLAs and the less pressurised inland areas in respect of proposals for static and caravan parks.

**18 Does policy TWR4 comply with national planning guidance in terms of year round occupancy and is the use of a condition restricting the operational period appropriate?**

- 18.1 **Response** - Yes, policy TWR4 does comply with national planning guidance in terms of year round occupancy. As standards of the holiday units and facilities on sites improve, and demands within the holiday industry change there is pressure for the holiday occupancy period to be extended. Planning Policy Wales, at paragraph 11.1.4 (PC.009) states that the planning system should seek to promote a tourism sector that is sustainable in order to contribute towards economic development, conservation, rural diversification, urban regeneration and social inclusion-in doing so consideration will need to be given to the needs of visitors and local communities
- 18.2 National planning guidance allows for proposals to extend the occupation period of holiday units subject to some conditions. Paragraph 15 in TAN 13: Tourism (PC.012) states that a holiday occupancy condition would seem more appropriate than a seasonal occupancy condition where there is a need to reduce pressure on local services. It also states that Authorities should continue to use seasonal occupancy conditions to prevent the permanent residential use of accommodation which, by the character of its construction or design, is unsuitable for continuous occupation especially in the winter months. This is reiterated in policy TWR3.
- 18.4 In terms of the use of conditions, seasonal or occupancy planning conditions are widely used by local planning authorities to ensure the holiday accommodation is used for its intended purpose. Many self-catering holiday units, static and touring caravan sites in the Plan area are located in areas where the provision of permanent housing would be contrary to national and local planning policies which seek to manage development, for example, in order to safeguard the open countryside. The policy recognises that not all sites in the Plan area would be suitable for year round occupation because of the quality of their facilities. Placing conditions on these developments can ensure that holiday accommodation is used for its intended purpose and **does not become a permanent place of residence.**
- 18.5 Some objectors to the plan have raised concerns regarding the difficulty in enforcing occupancy restriction conditions. It is the Councils' view that it is no more onerous or difficult to detect a contravention in an occupancy restriction condition than the seasonal restriction condition.

**19 Does policy TWR5 provide adequate protection to the Area of Outstanding Natural Beauty and Special Landscape Areas? Does the policy provide clarity on the type of development which would be acceptable on existing touring caravan sites?**

- 19.1 **Response** - Yes, policy TWR 5 does provide adequate protection to the AONBs and SLAs. In line with national planning policy, designation as a AONB or a SLA in itself does not preclude development. Touring caravan, camping sites and temporary alternative camping accommodation are considered more acceptable in land use planning terms as having less of an impact on the landscape than static caravan and chalet sites. This is because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape. The criterion within the policy aims to mitigate any potential environmental/landscape impacts.
- 19.2 The reasoned justification for the policy states that these sites can often be located in prominent and open locations and can at times be intrusive in the open countryside. It recognises that heavily pressured areas exist in many communities located on or near the coast, including extensive parts of both AONBs. In accordance with

national planning policy, the Councils will require strong evidence that proposals for further units of accommodation in such areas will not add to servicing problems or harm the character or natural resources of these areas.

- 19.3 The type of accommodation acceptable under this policy is temporary units, which are capable of being removed from site when not in use. The Policy does not list the type of units that will be acceptable because the alternative camping market is constantly evolving and changing and listing the acceptable type of units may limit the scope of high quality tourism developments. In terms of providing clarity on the type of development which would be acceptable under this Policy, Appendix 9 of the Deposit Plan and a post submission document, i.e. Scope of SPG and draft timetable (DA.010B), sets out the intention to produce a SPG, which will provide further guidance. Any units with a degree of permanency which will be on site all year round will be dealt with under Policy TWR5 of the Plan.

<b>20.0 Any other matters</b>
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