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Anglesey & Gwynedd Joint Local Development Plan EXAMINATION	

Ms N H Davies
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14/10/2016

Dear Ms Davies,

Anglesey and Gwynedd Joint Local Development Plan 2011-2026 Examination

Following on from the discussions held at the Examination Hearing Sessions 5 and 14 there are certain matters that were raised which we consider need further clarification or consideration.

1. Holyhead Waterfront Regeneration

The proposed development by Conygar Stena Line Ltd at Holyhead Waterfront was discussed at Session 14 and you advised me that the development had been granted outline planning permission. You also clarified that much of the development area lies below the mean high water mark and that the JLDP only allocates the land above the mean high water mark. Having considered your response, including that provided in relation to Action Point S14/PG1 we request that you provide further clarification on the outline planning permission given that it is not clear whether it extends beyond the administrative boundary of the local planning authority. If it does extend beyond this boundary a comment on the status of the permission is sought. You are also requested to provide further details on the overall development proposal, it's likely deliverability and any implications for the Plan, for example, should the Plan recognise the various aspects of the proposed development to provide clarity? Has the impact of the overall development on housing supply, including affordable housing, been considered?

2. Retail Provision

During the discussion at Session 5, I drew attention to the conclusions set out within the Gwynedd and Anglesey Retail Study (2012), and specifically, the identified quantitative need for additional convenience and comparison goods floorspace over the Plan period. I also questioned whether the Plan should also identify sites or allocate sites to accommodate the requirement. The Councils explained that they had taken account of the retail study but decided not to allocate sites, instead relying on the criteria based policies of the Plan as well as market forces and National Policy to facilitate this need.

In this regard, I would draw your attention to Planning Policy Wales (Edition 8, 2016) (PPW) which states:

10.2.9 Local planning authorities should consider through their development plans whether new sites should be identified in town, district, local or village centres for retail development, leisure development or other uses best located in centres.

10.2.12 Local planning authorities should take a positive approach, in partnership with the private sector, in identifying additional sites which accord with this approach.

10.2.13 Development plans should:

- *allocate sites for new retail and leisure facilities and other uses best located in town centres, where there is assessed to be a quantitative or qualitative need using the sequential approach;*

In light of this national policy context, the absence of any retail allocations in those towns where a significant level of need has been identified merits further consideration.

It is accepted that the identified need for convenience goods floorspace within Caernarfon and Pwllheli, and comparison goods floorspace in Caernarfon, is modest. However, this is not the case for comparison goods within Bangor, Pwllheli and Llangefni. Notwithstanding the criteria based policies of the Plan it is not clear how it makes adequate provision for the delivery of the required retail floorspace in a way which would be consistent with the aims of the Plan and National Policy in terms of the sequential test approach.

The Councils are requested to either: (i) provide further explanation to justify its approach; or (ii) reconsider its approach in this respect by introducing MACs to identify retail site allocations to meet the identified need for comparison goods retailing in the relevant settlements. In considering the acceptability of the present approach it will be necessary to establish whether the Plan provides adequate clarity and direction in terms of facilitating the scale of retail development that is required. Are there potential sites that have been identified to meet this need in appropriate locations? Have the town centre limits been drawn with sufficient capacity to facilitate sufficient opportunities for the required development? In the absence of allocations would the Plan provide sufficient certainty for developers to pursue proposals in areas of need? Would the absence of allocated sites make it difficult to resist proposals on sequentially poor sites?

If the Councils choose to pursue option (i), it should also address the implications of undertaking option (ii) in the event that we are not persuaded by the additional explanation provided to justify the present approach. Have the Council's considered the availability of sites that have a potential to be allocated for this purpose?

Bearing in mind the provisions of paragraph 10.2.12 of PPW the Plan should make it clear that the floorspace requirements set out within Policy PS12 are a guide for the future retail needs of those settlements rather than maximum figures. Consideration should be given to whether the reference to these requirements should be qualified by a reference to the timescales identified in the retail study (rather than, or in addition to, the references in paragraphs 7.3.83 & 83a that the Councils have suggested in response to Action Point S5/PG6). On a detailed point it is noted that criterion 3 of Policy PS12 refers to 'retail town centres' for convenience goods but only refers to 'retail centres' for comparison goods. There appears to be no reason for the different terminology which should be

avoided. It is assumed that the reference should be to 'retail centres'. These changes should be presented as Matters Arising Changes.

A MAC is also required to clarify that the floorspace requirements are net rather than gross figures. This is made clear in the retail study, but the only reference to this in PS12 was deleted by a Focussed Change.

Finally, in response to an objection raised to the extent of the Beaumaris Town Centre the Councils have confirmed in Action Point S15/PG1 that they accept that the boundary of the centre should be amended. During hearing session 5 questions were raised regarding the town centre boundaries of Blaenau Ffestiniog and Abersoch as well as Beaumaris. The Councils are requested to review the boundaries of every designated town centres, particularly in response to specific objections that have been raised with a view to either confirming the boundaries or suggesting amendments, as has been undertaken for Beaumaris.

You are requested to respond to the above points, setting out a timescale for any further work which you may intend to undertake, by 8 November 2016. The Monitoring Session (Session 16), which is scheduled for 1 November 2016, will provide an opportunity for further discussion on these points and to confirm the arrangements for the submission of additional work. This letter and any additional information or further exchanges regarding these matters will be placed on the examination website for the information of other interested parties.

If you require further clarification on any of the above then please do not hesitate to contact me via the Programme Officer.

Yours sincerely

Richard Duggan

Inspector