



**Uned Polisi Cynllunio ar y Cyd Gwynedd & Môn
Joint Planning Policy Unit Anglesey & Gwynedd**

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Your ref :

Mr Richard Duggan

Date: 9 January 2017

Inspector
c/o Programme Officer

Dear Sir,

Re: Gwynedd and Anglesey Joint Local Development Plan (2011 – 2026) - Examination

I refer to your letter dated 14 October 2016. I apologise for the delay in replying. Here is the response to the points in the order they were raised in your letter.

1. Holyhead Waterfront Regeneration Plan

1.1 The Isle of Anglesey County Council granted outline planning permission to Conygar Stenaline Ltd for a mixed use development with a new marina, residential property, a hotel, commercial and leisure and retail use, along with ancillary works to reclaim land and provide servicing infrastructure at Holyhead Waterfront, Holyhead on 14/02/14. The outline permission is subject to a number of conditions and a 106 Agreement. See a copy of the Committee Report and the Decision Notice for information in Appendix 1a and 1b to this letter. The following provides a summary of the matters managed by a Section 106 Agreement:

- (i) Need to present and agree an Affordable Housing Scheme before development is commenced;
- (ii) Provide for up to 50% affordable housing (intermediate) in accordance with the Interim Policy – Large Sites (February 2011);
- (iii) Not to remove affordable housing without conforming to a specific procedure;
- (iv) Contribute to reasonable costs associated with administrating and running a Local Liaison Committee;
- (v) To implement and pay for realising a “Links Scheme” that will create links and physical improvements between the site and Holyhead Town Centre;
- (vi) To implement and pay for realising a “Mitigation Scheme” that will relate to measures to create visitor management facilities to the Breakwater Country Park; create habitats to compensate for the loss of habitats as a result of the development; access links between the development and the Breakwater Country Park.

1.2 The map in Appendix 2 shows the location of the Isle of Anglesey County Council's administrative boundary

and provides a copy of the master-plan submitted by Conygar Stenaline Ltd.

- 1.3 Although there is no firm opinion as to whether the Planning Authority's rights extend below the low water mark (namely the administrative boundary shown on the map in Appendix 2), it is obvious that a local authority area can extend to the sea and below the low water mark in some circumstances, e.g. to include the harbour authority area.
- 1.4 In this case, the section of the site that is sea-bed equates to land (and thus, equates to a physical hereditament covered under section 336 of the 1990 Act), by being a part of the property and authorisation of the Harbour Authority under various Parliamentary Acts dating from the nineteenth century onwards. Stena Line Ports Ltd is one of the applicants and they are the Port Authority for Holyhead port. Amongst other things, they have leased the land, including the sea-bed, to another party.
- 1.5 As per the requirement, the application was referred to Welsh Ministers by the Local Planning Authority, but it was not 'called-in' for a decision.
- 1.6 You will note from the decision notice that the planning permission makes it mandatory for the applicant to submit an application for approval of the reserved matters by the end of 5 years from the permission date. You will also note from the decision notice that the consent is also subject to a number of conditions that requires the applicant to submit detailed information about developments associated with the 'Enabling, Access and Infrastructure Preliminary Work' (which includes the following: development stages, new sea-walls, marina basin, pontoons and moorings, service drainage infrastructure, access roads and highway works and perimeter sea-walls). This is therefore an ambitious development that needs to see a number of developments taking place before the main sections of the development, including the residential development, can take place. The enabling work includes raising land levels in many areas; which currently lie below sea level.
- 1.7 In 2015, an objection was received regarding the exclusion of sections of the site that had the benefit of planning permission from the Deposit Plan. The objection referred to the fact that the developer was busy commissioning the detailed design and engineering studies required in order to complete a reserved matters application. At the time of the public consultation regarding the Deposit Plan in 2015 the Isle of Anglesey County Council had not received an application to approve reserved matters or information regarding the matters for development that will be associated with the significant 'Enabling, Access and Infrastructure Preliminary Work'. Whilst accepting that there is no onus on an objector to submit a statement for discussion at a Public Hearing, it is considered reasonable to note the objector did not take advantage of an opportunity to submit information about work undertaken to date (if any) to develop the details of the proposal. Having discussed the matter with a Development Management officer I am able to confirm that no additional information has been submitted to the Council in relation to the reserved matters at the time of writing this letter.
- 1.8 Submitting and obtaining planning permission is an important step forward. Nonetheless, there is considerable emphasis on ensuring that the Plan should be deliverable. The Councils have tried to ensure that there is reasonable certainty that all the sites and the scale of development identified in the Plan are deliverable, and therefore able to demonstrate it can facilitate a continuous 5 years supply of land for housing. The Councils are mindful of the experience of other rural Councils who have included large mixed use sites that include housing allocations, where no development has taken place. They are also aware of the need to avoid identifying sites on the Proposals Maps, whose development could extend beyond the Plan period. It is considered that the objector at the Deposit and Examination stage has not shown clearly that there is reasonable likelihood for all this development to be delivered within the Plan period. Based on the information to hand about this proposed development (i.e. its complexity, the need for a considerable amount of additional detailed/ technical information before key aspects can be delivered, associated costs in providing the required information and delivery of infrastructure, coupled with the lack of progress in providing that information nearly three years since outline consent was granted), there is a reasonable possibility that not all the application site will be developed within the Plan period.

- 1.9 As noted in paragraph 1.1 above, permission has been granted for a mixed development including the construction of a marina (500 moorings) and a mix of ancillary developments (i.e. uses that would provide essential support to the marina). In brief, the ancillary developments include:
- i. Commercial / leisure use
 - ii. Training centre - sailing / youth centre
 - iii. Maritime Museum with visitor centre
 - iv. Marine workshops
 - v. Residential units
- 1.10 In essence, planning permission was granted for a tourism / leisure development. The Plan does not allocate land for tourism/leisure proposals. Such proposals can be directed to some locations; however, it is considered that allocating specific sites can be counter-productive as permanently directing a development to a site that is not deemed suitable by the market could mean that development will not happen in another location. In order to promote tourism / leisure development that is important to the local economy, the Plan includes a number of criteria policies in order to ensure that the development happens in the correct locations and on the correct scale.
- 1.11 This approach acknowledges in some circumstances that some new facilities and attractions can only be located in certain locations including in open countryside, particularly those associated with outdoor heritage and leisure assets. The preferred approach is to facilitate this possibility. Similarly, this approach will make allowance for unexpected tourism development, on a large scale, where there will be a need to weigh up the potential economic benefit against detrimental impacts and mitigation measures. It is believed that implementing a positive policy approach will give businesses confidence to invest by giving assurance that other considerations will be given due attention.
- 1.12 In the next paragraphs, more details will be given about the above-mentioned elements of the mixed use project, noting how the Plan's policies promote them.
- 1.13 Commercial/ leisure use - the development includes 4,040 m² of commercial / leisure use; namely a mix of retail use (A1, A2, A3) and business (B1). It is noted that the proposed uses would be directly associated with the marina's operation. At the planning application stage, it was assessed that they would not normally be located in a town centre, nor would they therefore directly compete or be likely to undermine the viability of a town centre. It was resolved that a condition could be included to ensure a reduced impact on the town centre and to remove permitted development rights to convert A3 and A2 uses into A1. Policy MAN3 (see section 2 of the letter) can promote this type of development.
- 1.14 Sailing training / youth centre, maritime museum, with visitor centre, marine workshops - these are clearly elements with a close connection to the proposed marina and the site's location on the sea-edge. The Plan's current policies promote this type of development without a need for an allocation.
- 1.15 Hotel - Policy TWR 2 in the Plan promotes new hotels in the Plan area.
- 1.16 Residential units - the development would include 252 one and two bedroom flats. 252 of these would be in 2, 3 or 4 storey blocks mainly located near the marina and the "Porth y Felin" area. There are three additional elements that can be described as a conventional housing development, including 28 two-bedroom housing units, 40 three-bedroom housing units and 6 four/five bedroom housing units. In the context of the preparing the Plan, consideration needed to be given to the specific type of accommodation intended in the proposed development. They are all class C3 use. Nevertheless, it is reasonable to note that the majority of the flats are one and two-bedroom, in large blocks, mainly located near the marina and promenade. It is considered that these flats would be attractive to a specific market, i.e. households who are looking for a marina mooring located alongside accommodation, or accommodation to use whilst on holiday. As such, and as noted in the report to the Planning Committee, these units are not considered to be conventional houses in that would probably not address a need for

permanent residential accommodation. As noted in the report to the Planning Committee it would not be expected for a housing allocation or a site with planning permission in another location to provide them.

- 1.17 As noted in paragraph 1.1 above, a Section 106 Agreement sets a requirement for the provision of up to 50% affordable housing (intermediate) in accordance with the Interim Policy – Large Sites, which is a material planning consideration. Therefore, the Council's starting position would be that 50% of all the residential units would be affordable. However, the Council could be faced with a possibility that the cost of providing the infrastructure required to facilitate elements of the development and the requirements of the Section 106 may not allow the proposal to maintain the 50% target. The revised Affordable Housing Viability Study places Holyhead in a house price area that has a 10% indicative affordable housing target.
- 1.18 From the Plan's perspective, careful attention also needed to be given to the fact that extensive parts of the area for the residential element are currently located within a C2 flood zone - land that is currently below sea level. It is noted that the flooding assessment had been submitted with the planning application and that the former Environment Agency was satisfied that measures such as raising land levels to create platforms for the development, erection of sea-wall, etc. would make the development acceptable subject to conditions to ensure that the risks and consequences of flooding are appropriately controlled. Implementing the conditions will involve significant investment in infrastructure in order to comply with the conditions.
- 1.19 It is noted that the objector has referred to the possibility of the development's ability to provide accommodation for the construction workers of Wylfa Newydd, which suggests an element of uncertainty in terms of the delivery of the scheme as proposed in the planning application during the Plan period.
- 1.20 After giving careful consideration to the lack of technical reports to the Council; that the majority of the units would accommodate persons with a specific location need to reside near the marina or persons on holiday and would therefore not be conventional housing; that sections of the site are in C2 flood zones; reference to the site's availability as temporary accommodation for construction workers, it was decided to allocate only the section of the existing proposal set aside/ designed mainly for conventional housing. This section of the site, which is subject of the outline permission, is outside C2 flood zone. The Plan's standard development density was applied to identify an indicative number of housing units on the allocation. This approach avoids reliance on a mixed use development site that is relatively large, whose success depends on the favourable conclusions of a number of technical studies that had not been completed at the time of preparing the Plan nor presented to the Council at the time of writing this letter.
- 1.21 The Plan will be monitored annually, with a review to take place in 4 years. This will allow the Councils to address the impact of granting planning permission to reserved matters and development commencing on the site.

2 Retail provision

- 2.1 As you note in your letter, the Retail Study has identified a net quantitative need for additional comparison goods space during the Plan period in the following centres:

<u>Retail Centre</u>	<u>2011 – 2021</u>	<u>2022 - 2026</u>	<u>Indicative total (net)</u>
<u>Bangor</u>	<u>5,105 m²</u>	<u>2,808 m²</u>	<u>7,913 m²</u>
<u>Pwllheli</u>	<u>413 m²</u>	<u>359 m²</u>	<u>772 m²</u>

<u>Llangefni</u>	<u>44 m²</u>	<u>448 m²</u>	<u>492 m²</u>
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- 2.2 The Plan has identified town centres on the proposals maps. The town centres include the main shopping areas (if they are large enough to do so) and areas that include land uses expected to be seen mainly in towns, either in the main shopping area or alongside it. In accordance with Planning Policy Wales, the aim of the Plan is to protect town centres in order to maintain and improve the range and choice of what can be obtained in sustainable areas and retain expenditure in the towns.
- 2.3 No specific sites have been allocated to address the identified need in the Study thus far, for many reasons:
- The candidate sites identified in the Study for Bangor and Pwllheli were not available. Each one is used either as a public car park or as space associated with current retail units;
 - A site was included on the Candidate Sites Register in Pwllheli (SP765) for mixed use and reference was made to retail use. However, it is a greenfield site in a C1 flood risk area. Since then, an objection was received to the fact that the site was not included in the Deposit Plan for housing, which is a sign that ideas for developing the site are speculative in nature;
 - No information was received about other alternative sites at the call for sites stage;
 - There were no other obvious sites available at the time of preparing the Deposit Plan;
 - On the basis that there is a lack of prominent sites available or likely to be available, it was considered that a criteria based policy would facilitate development to address the need on appropriate sites. There was also concern that allocating specific sites could be counter-productive because directing development permanently to a site that is not deemed suitable by the market could mean that development will not happen in another location, which could be consistent with the relevant policy;
 - The area identified by Bangor City Council at the time of the public consultation on the Deposit Plan as a candidate area for regeneration is in multiple-ownership, there are several current land uses, and Gwynedd Council has no schemes or resources to regenerate the area;
 - No objection was received from a retail development company due to the lack of land allocation for retail.
- 2.4 After giving further consideration to the matter, including revisiting: Planning Policy Wales; the boundaries of town centres in Bangor, Llangefni and Pwllheli and the surrounding areas; the wording of the Plan's retail policies, the Councils wish to introduce the following Matters Arising Change in order to facilitate sufficient opportunities for the required development in the future and in order to address the matters raised in your letter regarding the information submitted in the policies and their explanations.
- 2.5 Matters Arising Change - extend the boundaries of Bangor town centre to (i) include additional retail property (Aldi supermarket) that was granted permission on the basis that it was in an appropriate edge of town centre location, and the Menai multi-storey car park, that is managed by the owners of Menai Shopping Centre, and (ii) space in the rear of the former Debenhams store on the High Street. It is believed that doing that will be consistent with the principles behind the identification of town centre boundaries in the Plan area, as described in paragraph 2.2 above. Extending the boundaries in the way suggested would confirm the area's 'role' shown on the map in Appendix 3 as a candidate 'edge of centre' location. Currently, this area on the outskirts of the centre includes: Bangor University's School of Engineering Sciences, a Night Club, offices, residential use - houses, flats and bespoke student accommodation (provided by the private sector). It would add to the potential choice of sites that a proposed developer would need to look at during the planning application stage if no unexpected site becomes available within the town centre.
- 2.6 No changes need to be made to the boundaries of Llangefni or Pwllheli town centres. Although there is no obvious site within the boundary of the town centre to address the additional demand anticipated, it is believed that the location of the current boundaries is sufficient to identify reasonable sequential sites to investigate at the planning application phase - see maps in Appendix 4.

- 2.7 Matters Arising Change to paragraph 7.3.83a to show a timetable to address the need in the various centres, to confirm that indicative figures have been identified, not total figures, and that they are net figures, not gross figures. Note that this MAC replaces the wording included in the Councils' original response to Action Point S5/PG6:

7.3.83a However, in respect of comparison goods, the Study concludes that there was potential for some 9,353 sq. m. net floor space to be provided over the Plan period as noted below:

- 7,913 m² Bangor
- 176 m² Caernarfon
- 772 m² Pwllheli
- 492 m² Llangefni

<u>Retail Centre</u>	<u>2011 – 2021</u>	<u>2022 - 2026</u>	<u>Indicative total (net)</u>
<u>Bangor</u>	<u>5,105 m²</u>	<u>2,808 m²</u>	<u>7,913 m²</u>
<u>Caernarfon</u>	<u>–</u>	<u>176 m²</u>	<u>176 m²</u>
<u>Pwllheli</u>	<u>413 m²</u>	<u>359 m²</u>	<u>772 m²</u>
<u>Llangefni</u>	<u>44 m²</u>	<u>448 m²</u>	<u>492 m²</u>

- 2.8 Matters Arising Change to Policy PS 12 to confirm that indicative figures have been identified, not total figures; that they are net, not gross, figures; and to correct criterion 3.

STRATEGIC POLICY PS12: TOWN CENTRES AND RETAIL

The Councils will work with partner organisations and the local community to protect and enhance the vitality and viability of town centres in the Plan area in recognition of their retail, service and social functions in accordance with the following retail hierarchy:

Gwynedd	Sub-regional Retail Centre	Bangor
	Urban Retail Centre	Caernarfon, Porthmadog, Pwllheli
	Local Retail Centre	Abersoch, Abermaw, Bethesda, Blaenau Ffestiniog, Cricieth, Llanberis, Nefyn, Penrhyndeudraeth, Penygroes, Tywyn
Ynys Môn	Urban Retail Centre	Holyhead, Llangefni
	Local Retail Centre	Amlwch, Benllech, Beaumaris, Cemaes, Llanfairpwll, Menai Bridge, Rhosneigr, Valley

The Councils will promote the vitality and viability of town ~~/city~~ centres in the Sub-regional Retail Centres, the Urban Retail Centres and the Local Retail Centre as shown on the Proposals Maps by:

1. Encouraging a diverse mix of suitable uses (as defined in PPW-Planning Policy Wales and TAN Technical Advice Note 4) in high quality environments that attract a wide range of people at different times of the day, and which are safe and accessible to all;
2. Ensuring that new investment will be consistent with the scale and function of the city/town centre in accordance with the retail hierarchy;
3. Facilitating the provision of ~~a total of approximately~~ 372 square metres (net) of new convenience floor space ~~and 9,353 sq. m. net of comparison floor space~~ by 2026 in accordance with the conclusions of the Retail Study (2013) in the appropriate locations;

in the following town retail centres:

- 200 m² net Caernarfon
- 172 m² net Pwllheli

and, in terms of comparison goods , facilitate provision of approximately the potential for 9,353 square metres (net) of floor space by 2026 in accordance with the conclusions of the Retail Study (2013) in appropriate locations in the following retail centres:

- 7,913 m² net Bangor
- 176 m² net Caernarfon
- 772 m² net Pwllheli
- 492 m² net Llangefni

3. Resisting development that detract from their vitality and viability and protecting against the loss of retail units within the Primary Retail Areas, as shown on the proposal maps;
4. Maximising opportunities to re-use suitable buildings within town centres;
5. Restricting the expansion of out-of-town retailing and leisure development;
6. Encouraging sustainable links between the workplace, home and town centres.

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 supported.

- 2.9 The Councils have considered whether a reference should be included to the detailed timetable referred to in paragraphs 7.3.83 and 7.3.83a and they are of the opinion that the reference to the timetable in these paragraphs is sufficient.
- 2.10 Matters Arising Change to Policy MAN 3 and its explanation in order to remove words that were included twice in the Welsh version of the Policy; change criteria 4 and 5 in order to improve clarity; change the explanation to confirm that proposals for retail developments outside town centres must satisfy the sequential test and provide further guidance than what is currently included in the explanation.

POLICY MAN 3: RETAILING OUTSIDE DEFINED TOWN CENTRES BUT WITHIN DEVELOPMENT BOUNDARIES

Shops located outside defined town centres but within the development boundary will be safeguarded by refusing proposals for other uses unless it can be demonstrated that all the following criteria can be met:

1. That there is a similar service available within reasonable walking distance;
2. If there is no similar service present, that the property has been on the market for a reasonable selling price or rent for a continuous period of 6 months;
3. That the new use will not have detrimental impact on the amenities of adjacent uses.

Proposals for new small scale convenience shops that meet the daily needs of residents for essential daily goods will be approved, provided that they do not jeopardise the viability and vitality of existing town centres in the retail hierarchy and do not form part of an industrial estate.

Proposals for major retail development and sub-division of existing retail units outside the defined town centre boundaries will only be granted provided they conform to the following criteria:

4. The development would not undermine the retail hierarchy set out in Policy PS 12 in the Strategic Policies and detailed Policy MAN1; and

5. The development either by itself or in combination with other permitted or allocated retail developments would not undermine the vitality and viability ~~of the defined town centre of any of the centres;~~
6. Evidence of need for additional provision has been demonstrated;
7. The sequential approach set out in ~~Planning Policy Wales national planning policy and guidance and in the Plan has been satisfied.~~

7.3.96 Proposals outside the defined town centres ~~on edge of town centre sites or outside the town centre will be carefully controlled in order to support the town centres of the retail centres listed in Policy PS 12. The Retail Study (2013) has identified the possible need for additional retail space at specific periods during the Plan period (see paragraph 7.3.83 and 7.3.83a). The Plan, in accordance with Planning Policy Wales, is aware that thriving town centres are essential to maintain the area's communities. The Councils have not been able to identify specific sites within the relevant town centres to address the possible additional demand. Nevertheless, in terms of selecting a location to address the possible additional demand, proposals will be determined by to use the sequential approach outlined in Chapter 10 of Planning Policy Wales. If it can be shown through this test that there is no suitable town-centre site available, emphasis will be placed on assessing edge of town centre sites before looking at sites outside the centre for key town centre uses. This approach will expect developers and retailers to be flexible and innovative in terms of format, design and scale of the proposed development and the amount of car parking required, tailoring these to fit local circumstances.~~

7.3.96a Proposals for retail uses on industrial estates unrelated to factories selling their own products will not normally be permitted because retail development in such locations can have the effect of limiting the range and quality of sites available for employment uses as well as having a detrimental impact on the vitality, attractiveness and viability of existing town and local centres.

7.3.99 ~~Planning Policy Wales establishes the approach to applying the needs and sequential tests for retail development.~~

2.11 Additional work - see above, and the maps in Appendix 3 and 4, that the Councils have identified many sites/ areas on the outskirts of the town centres of Bangor, Llangefni and Pwllheli that could be acceptable in terms of the sequential test. They are close enough to the edges of the Town Centre to be able to walk from one to the other and to take advantage of bus routes and bus stops. There are no physical barriers to make it difficult for shoppers to move from one place to another. They offer opportunities to share current parking facilities. Paragraph 5.3 of TAN 4 – Retail and Commercial Developments (NCT) (November 2016) states the following:

“If that need requires new sites to be identified then local planning authorities should seek to identify sites within established retail and commercial centres depending on the scale of provision. If after investigation suitable sites within established centres are not available local authorities should consider whether a centre’s boundaries should be extended in order to meet the need identified before out of centre sites are considered (see further guidance on the sequential test in section 7). The identification of these sites will need to take into account their availability and deliverability for new development within the plan period as well as the opportunities to regenerate or support retail and commercial centres through new development”

2.12 Consideration was given to including the sites seen in Appendix 3 and 4 in the town centre boundaries but they do not include a concentration of uses one would expect to see in a defined town centre. The Councils do not own all the sites; some are likely to be in the ownership of a number of individuals / companies. The majority are used for other purposes at present and there is no sign at present that this will not continue in

the near future.

- 2.13 The Councils intend to undertake research to identify the owners of the property and obtain understanding of the plans for the property in the medium/long-term, e.g. one of the properties in the potential search zone in Bangor is owned by Bangor University and it is understood that they are currently reviewing their Property Strategy. After receiving information about land ownership and plans for the future, it is intended to undertake further work in order to conclude whether it is practical and viable to allocate specific sites to address the possible need that has been identified. This will need to be done in consultation with representatives from the retail / commercial sector and other services within the Councils, e.g. economic development, property. In accordance with paragraph 10.2.15 Planning Policy Wales (9th Edition, 2016) the Councils will need to undertake an impact assessment to determine how the proposed development could affect nearby retail and commercial centres. All in all undertaking this work in accordance with national planning policy and guidance will entail a complex piece of work that will likely require the Councils to commission a consultant to assist them. This would inevitably lead to a delay in the overall Plan preparation process in order to allow time to prepare a brief, commission a suitable consultant and prepare a response to the study's output.
- 2.14 Instead it is anticipated that this proposed work would update the annual monitoring work that will take place and it could influence any response that could be required if the criteria based policy doesn't work satisfactorily.
- 2.15 Bearing in mind the point we have reached in the process of preparing the Plan, the time that would be required to undertake the work described above, the need to have a new Plan to replace the Gwynedd Unitary Development Plan (that is coming to the end of its period this year) and the need to replace the development plan for Anglesey (which is outdated), it is believed that the criteria policy approach is the best way forward. This approach should ensure that we should be able to consult on Matters Arising Changes in a timely manner and hopefully be able to adopt a new Plan in the Spring 2017. It is considered that we have shown, subject to the Matters Arising Changes, that the Plan provides sufficient assurance to developers in terms of the Councils' expectations in terms of identifying suitable sequential sites.

3 Other town centre boundaries

- 3.1 I wish to confirm that the Joint Planning Policy Unit has reviewed each defined town centre, in particular Abersoch and Blaenau Ffestiniog, where objection was received regarding the location of the town centre boundaries. This was undertaken by using the LLPG tier (database of addresses kept by the local authority and that have been categorised according to use, i.e. residential, commercial, etc.) and through site visits.
- 3.2 In the case of Blaenau Ffestiniog, there are retail units and other uses that one would expect to be seen in retail centres in locations outside the defined town centre. However, there isn't a sufficient concentration of them to warrant identifying them as an extension to the town centre seen in the Plan. In addition, the Retail Study notes that the justification for the old long high street has disappeared and there is a need to focus on the core area. In the case of Abersoch, again, there are shopping units located beyond the defined town centre. However, there is a clear gap between them and the core shopping area (the town centre) and they are very small groups. The work of reviewing the other town centres has not identified the need to alter the boundaries of other town centres in the Plan area. The Councils are confident that they have identified the core shopping areas that need to be focused on and that the policies promote suitable alternative uses outside the town centres, and therefore the centres will continue to be maintained and strengthened.

I trust that the content of the letter and its appendices sufficiently addresses the issues raised in your letter.

Yours sincerely

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