

18 September 2019

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Conwy County Borough Council  
Civic Offices  
Colwyn Bay  
Conwy  
LL29 8AR

**By email only:** [cdll-ldp@conwy.gov.uk](mailto:cdll-ldp@conwy.gov.uk)

Dear Sirs,

## **Conwy County Borough Council (CCBC) Replacement Local Development Plan Stage 5 – Preferred Strategy (September 2019)**

On behalf of our client, Legal & General Assurance Society Limited (hereafter referred to as 'L&G'), Deloitte LLP (hereafter referred to as 'Deloitte'), we provide the following response to Stage 5 – Preferred Strategy of the CCBC Replacement Local Development Plan (RLDP).

### **Llandudno Junction Leisure Park**

Llandudno Junction Leisure Park is wholly owned by L&G. It consists of a nine screen multiplex cinema, operated by Cineworld and combination of restaurants, car parking and associated landscaping. L&G's ownership extends to the east to include the freehold of Conwy Business Centre.

Since opening in 2001, the Leisure Park has become a popular leisure destination for the North Wales sub-region, attracting local residents and tourists alike throughout the year. Having acquired the Leisure Park in October 2013, L&G's long-term objective is to improve the restaurant offer and create more choice for existing and future customers of the site.

The Leisure Park is highly accessible, located within Llandudno Junction and within easy reach of both Llandudno Junction train station and the strategic road network.

Tourism is an important part of the Conwy economy, supporting 12,208 full-time equivalent jobs and bringing £839m revenue to the County's economy annually<sup>1</sup>. Locations such as Llandudno Junction Leisure Park make a vital contribution to this sector and need to continue to evolve to remain attractive.

For the purposes of the retail hierarchy, Llandudno Junction is designated as a Town Centre in the RLDP.

L&G provides the following response to the Preferred Strategy.

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<sup>1</sup> CCBC – Topic Paper 4: Tourism

## Stage 5 – Preferred Strategy

Question	Response
<p><b>Summary comment</b> (100 words)</p>	<ul style="list-style-type: none"> <li>• L&amp;G supports the objectives of the RLDP that seek to safeguard the leisure function of Llandudno Junction Leisure Park.</li> <li>• Flexibility to enable such centres to respond to changing occupier and customer demands, particularly during a period of rapid structural change, is vital. The forthcoming criteria based policy for the Leisure Park should ensure a broad definition of 'leisure' (set out below), enabling flexibility in securing tenants and improving the diversity of offer.</li> <li>• Llandudno Junction should remain unchanged in its current position within the retail hierarchy as a Town Centre.</li> <li>• Surrounding allocations should maximise opportunity to integrate with the Leisure Park.</li> </ul>
<p><b>Comments on the proposed Vision and Objectives</b></p>	<p>L&amp;G is supportive <b>Strategic Objective 3</b> to achieve vibrant, attractive and viable town centres by encouraging a diversity of activities and uses.</p> <p>The Preferred Strategy recognises that leisure, entertainment and food and drink uses can benefit retail and commercial centres, whilst careful regard must be paid to safeguarding amenity when contributing towards an evening economy.</p> <p>Llandudno Junction Leisure Park makes a significant contribution to the leisure and entertainment offer of Llandudno and its overall vitality and viability. The Leisure Park is an established leisure location, appropriately positioned to minimise impact on the amenity of residents, whilst being highly accessible and sustainably located.</p> <p>The contribution of Llandudno Junction Leisure Park also includes a variety of jobs, including part time jobs suited to local young people or those seeking to work flexibly.</p> <p>These attributes mean that Llandudno Junction Leisure Park should remain a focus for future leisure and entertainment development and intensification.</p>
<p><b>Comments on the proposed levels of growth</b></p>	<p>Concentrated growth needs to be focused in the most sustainable locations. Whilst the Creuddyn Strategy Area will account for 30 per cent of housing growth and 30 per cent of job growth, there should be a recognition that the increasing population and economic growth should be supported by a diversity of leisure and tourism uses.</p> <p>Llandudno Junction Leisure Park has capacity to diversify and to intensify its mix of uses, and there should be an acknowledgement of this in the RLDP.</p>
<p><b>Comments on the proposed spatial strategy</b></p>	<p>L&amp;G supports the preferred strategy to focus development within the Coastal Development Strategy Area and on the most sustainable urban settlements – including Llandudno Junction.</p> <p>Llandudno Junction is recognised as a key economic hub, with excellent transport links and the opportunity to safeguard and enhance the existing employment offer.</p> <p>Llandudno Junction should remain unchanged in its current position within the retail hierarchy as a Town Centre.</p> <p>In the context of the evolution of town centres and high streets across the country, the RLDP should continue to protect such locations for leisure and entertainment uses that generate footfall and contribute to the vitality and viability of the centre.</p> <p>Flexibility to enable centres to respond to changing occupier and customer demands, particularly during a period of rapid structural change, is vital. Policy</p>

Question	Response
	support should be provided to convert spaces within town centre locations to follow market demands and new tenant trends.
<b>Comments on the proposed Strategic Policies</b>	<p>L&amp;G supports the objective of <b>Strategic Policy 16: Retail</b>, which will safeguard the leisure function of Llandudno Junction Leisure Park. As set out in Topic Paper 3 – Retail &amp; Town Centres, there is a recognition that a leisure designation for the Leisure Park will mean that these uses can be protected and controlled in future.</p> <p>Tourism is an important part of the Conwy economy, and policy support should be provided to enable locations such as the Junction Leisure Park to continue to evolve and remain attractive destinations for residents and tourists. L&amp;G supports the recognition in <b>Strategic Policy 28: Tourism</b> that development should provide a diversity of tourism attractions.</p> <p>Page 105 of the RLDP Preferred Strategy states that proposals at Llandudno Junction Leisure Park will be subject to a criteria based policy to protect its leisure function. The definition of 'leisure' in such a policy should be broad, in order to enable flexibility in securing tenants and improve the offer at the Leisure Park.</p> <p>Leisure could include entertainment uses, cinemas, restaurants, bars and pubs, casinos, health and fitness centres, indoor and outdoor sport and recreation facilities, and tourism related uses such as hotels and conference facilities.</p> <p>L&amp;G seek the opportunity to discuss wording of the leisure criteria based policy with CCBC planning officers.</p> <p>Llandudno Junction should remain within the retail hierarchy as a Town Centre. It is recognised that the boundaries for Town Centres will be detailed at Deposit Stage – L&amp;G seek confirmation that Llandudno Junction Leisure Park is included within this boundary.</p> <p>In allocating Llandudno Junction Leisure Park, consideration should be given to opportunities for the expansion of the site. This should include the integration of the site with surrounding redevelopment proposals or allocations.</p>

L&G support the development of the RLDP and would welcome the opportunity to discuss with planning officers the appropriate allocation of Llandudno Junction Leisure Park, in order to acknowledge its contribution to the leisure and tourism sector and that vitality and viability of the wider region.

L&G would also like to engage with the Council to understand the aspirations for other surrounding site allocations, given previous extensive discussions regarding redevelopment opportunities.

Please do contact either me or Ross Raftery ( [REDACTED] ) should you wish to discuss this letter further.

Yours sincerely,

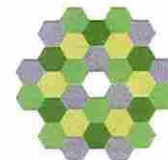
[REDACTED]

**Mark Underwood**  
Deloitte LLP

**Appendix A – L&G site ownership**

# Land Registry Current title plan

Title number **WA952077**  
Ordnance Survey map reference **SH7977NE**  
Scale **1:2500**  
Administrative area **Conwy**



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