Powys Replacement Local Development Plan (RLDP)

Report: Review of retail and town centre hierarchy, health and boundaries

Prepared for Powys County Council

May 2023

Table of Contents

Version Number:	2.0 draft
Approved by:	OD
Date:	30/05/23

Figures and tables

1 Introduction

This report has been prepared jointly by Owen Davies Consulting and Chilmark Consulting on behalf of Powys County Council (the Council). Its purpose is to provide an updated evidence base on retail and town centre uses to inform the Replacement Local Development Plan (RLDP) which the Council is in the process of preparing.

The RLDP is intended to be operative by April 2026 when the adopted Local Development Plan (LDP) reaches Its end date (on 31st March 2026). In common with the LDP, the RLDP will cover the whole of Powys excluding the area in the Brecon Beacons National Park where the Brecon Beacons National Park Authority (BBNPA) is the Local Planning Authority.

2 The Brief

This study seeks to provide details of the main centres in Powys and to understand the changing retail and economic pressures they are experiencing. It advises on an appropriate approach to the town centre strategy for the RLDP area that will build on identified opportunities and manage change in a positive way for the local communities the centres serve.

Specifically, it is required to:

- Establish an evidence base of town centre uses and change and the health of each centre.
- Establish a hierarchy of retail and commercial centres;
- Review potential changes to the defined town centre boundaries.
- Consider the future roles of these centres during the period to 2037.

Further studies will examine the:

- Retail capacity/needs assessment, including potential for new allocations.
- Reviewing of primary and secondary frontages.
- Review town centre policies.

The report has been supported with retail data provided by the Local Data Company – Powys County Council 2019-2022 Analysis, supplemented with additional survey information provided by Owen Davies Consulting for Llanwrtyd Wells, Llanfair Caereinion, and Llanfyllin town centres.

3 Planning Policy Context

Planning Policy Wales

National planning policy guidance is set out in Planning Policy Wales (PPW). To support the Government's primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, PPW identifies a number of overarching objectives for retail and commercial centres. These are recognised as hubs of social and economic activity and the focal point for the diverse range of services which support the needs of local communities. They are highly accessible by different modes of transport and are therefore the most sustainable locations for new development.

The national objectives for town centres are to:

- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business;
- Sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness; and
- Improve access to, and within retail and commercial centres, by all modes of transport, prioritising walking, cycling and public transport (para 4.3.3).

These objectives are to be delivered by local planning authorities through their development plans and national policy requires that:

- Retail and commercial centres should be identified in development plans (para 4.3.2);
- Development plans should provide a clear strategy for retail development, to include policies that will achieve vibrant, attractive and viable retail and commercial centres (para 4.3.4). These should be based on an understanding of the changing retail pressures affecting the centres and devise appropriate responses whether to growth or decline (para 4.3.6);
- A hierarchy of retail and commercial centres should be established and boundaries for the centres should be shown on the Proposals Map (para 4.3.10). Centres should be categorised by their function, size, scale, form and location and a framework for their future roles should be set out (paras 4.3.11 & 4.3.12);
- Policies should encourage a diversity of uses in a centre, recognising that this contributes to vibrancy and viability. Diversity can also reduce vacancy levels (para 4.3.36);

- Policies should identify which retail and commercial centres have primary and secondary shopping areas. These should be defined on the Proposals Map and the plan should include policies describing the types of uses that are likely to be acceptable in these areas (para 4.3.32 and 4.3.33);
- Mixed and general diversity of use developments should be encouraged where appropriate (para 4.3.34);
- The health of centres should be monitored and planning authorities should consider making changes made to the policies or boundaries if the right balance of acceptable use and activity is not being achieved (paras 4.3.35 – 4.3.36);
- The development plan process should include an assessment of the need for additional retail development. This should include a consideration of quantitative and qualitative need (para 4.3.13);
- Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace (para 4.3.15);
- Qualitative need may be an important consideration in certain circumstances where it supports the objectives of the local development plan or national planning policy. However, it is for the planning authority to determine and justify the weight given to any qualitative assessment (paras 4.3.15 – 4.3.17);
- If a need is identified, the most appropriate form, scale, and location for provision should be considered (para 4.3.8), in accordance with the 'town centre first' policy (para 4.3.18);
- The strategy and policies of the development plan should set out a framework for the authority's retail and commercial centres, taking into account the strategies of adjoining authorities to support a successful retailing sector (para 4.3.4);
- Development plans should include criteria based policies against which retail proposals can be assessed, even if there is no identified need (para 4.3.9);
- Development plans should also include policies to protect existing retail sites from inappropriate development, unless there is evidence that an existing retail site is no longer required (para 4.3.24);
- Policies and supplementary planning guidance should support the management of retail and commercial centres (para 4.3.39); and
- Residential uses should be encouraged where town centres have been in decline and where boundaries are amended to free up land for residential and other appropriate uses (para 4.3.37).

PPW is also explicit as to the types of other uses considered to be complementary to retail and therefore appropriate in retail and commercial centres. These include:

- Financial and professional services (A2);
- Food and drink (A3);
- Offices (B1);
- Hotels (C1);
- Educational and other non-residential establishments (D1);
- Leisure (D2); and
- Other uses such as launderettes and theatres (para 4.3.21).

The contribution of a vibrant and viable evening and night-time economy is also recognised, although the compatibility of the offer with nearby residential uses should be considered (para 4.3.43). Similarly, creative and cultural business clusters can be important catalysts for regeneration (para 4.3.46).

Technical Advice Note 4: Retail and Commercial Development

PPW is supported by a series of Technical Advice Notes (TANs) including Technical Advice Note 4: Retail and Commercial Development (TAN4) which provides further guidance on retail and town centre policy, both in relation to policy making and development management.
It sets out a requirement for local planning authorities to plan positively to protect and enhance the vibrancy, viability and attractiveness of their retail and commercial centres and to develop their retail evidence base. It also provides additional guidance on:

- How to define retail and commercial centre hierarchies, including the need to consider the future status of a centre;
- The types of policies that may be appropriate in relation to changes of use and the degree of flexibility a local planning authority wishes to see;
- The development of a clear strategy for retail and commercial centres during the plan period;
- The factors that should be considered in deciding how any identified retail need should be met, or how decline should be managed to ensure that communities retain access to the goods and services they require;
- The benefits of developing the night-time economy in relevant centres;
- How quantitative retail need should be assessed, noting that the outcome can be sensitive to small changes in the assumptions. No particular

methodology is prescribed, but assessments should be prepared in a clear logical and transparent way using robust and realistic evidence;

- The appropriate times to consider qualitative need and when retail development may be justified on this basis;
- The 'town centre first' approach to development and how the sequential test should be applied both in relation to development plan site allocations and planning applications for retail or other town centre uses;
- The need to consider the impact any new site allocations may have on existing retail and commercial centres;
- The use of designated Primary and Secondary Shopping Areas to promote and maintain an effective distribution and balance of uses within a centre, noting that the level of flexibility applied is likely to reflect the centre's retail performance and demand for space; and
- The need to undertake regular assessments or 'health checks' of centres as a means of monitoring change over time, using a range of indicators to measure vitality, attractiveness and viability. A number of specific measures are referenced but TAN4 recognises that locally specific indicators may also be relevant.

4 Other National Policy and Guidance

Other documents that may be of relevance include the following:

Future Wales – The National Plan 2040 (February 2021)

Future Wales–the National Plan 2040 is the national development framework and sets out the direction for development in Wales to 2040. It is the highest tier of development plan and is focussed on solutions to issues and challenges at a national level. Its specific purpose is to ensure that the planning system at all levels is consistent with and supports the delivery of the Welsh Government's strategic aims and policies.

As a result, it does not contain statements on all land use planning issues set out in Planning Policy Wales but instead has policies on issues which the Welsh Government considers to be a national priority or are matters which are distinctly spatial and require national leadership. In relation to retail and town centre matters, Future Wales is clear that existing cities and large towns will be the main focus for development and identifies three National Growth Areas. Future Wales also identifies four Regions within which are National and Regional Growth Areas which should retain and enhance the commercial and public service base that make them focal points in their areas. Within the Mid Wales Region, Regional Growth Areas are Identified within Powys. ·and the ones located within the RLDP area include

- The Heart of Wales, including Llandrindod Wells and Builth Wells
- Bro Hafren, including Welshpool and Newtown

Future Wales sets out a 'Town Centre First' approach to development (Policy 6) which extends the well-established approach for retail development to a wider range of land uses including significant new commercial, education, health, leisure and public service facilities as well. This recognises the changing nature of town centres, which are moving away from their traditional retail roles. Health and vibrancy, however, can be maintained by widening the uses accommodated in centres, which also benefit from good access by public transport to and from the whole town or city and, where appropriate, the wider region.

A sequential approach must be used to inform the identification of the best location for these developments, with the aim of making town centres multi-functional places and the focus of growth and regeneration. Intensification and diversification in and around town centres is also supported.

Powys Local Development Plan

The Powys Local Development Plan (2011-2026) was adopted by Powys County Council in April 2018.

Strategic Policy SP4 – Retail Growth identified the County's towns as its main centres for convenience, and in some cases comparison shopping, although some needs are met by larger retail centres (towns, cities and retail outlets) outside the county. Significant supermarket retail development was identified, most notably supermarkets in Llandrindod Wells, Newtown, Welshpool and Ystradgynlais, and there was interest from investors in other towns such as Machynlleth and Presteigne.

A retail study[1] was undertaken in 2011 and updated in 2015 to inform the LDP and this found, having regard to recent (to 2015) development, that whilst there was no significant need for additional comparison floor space, the study update recognised a need within the Plan period for additional convenience floor space to be allocated in the Presteigne area. The study update considered that any additional comparison floor space requirements could be accommodated utilising vacant premises within existing retail centres.

The LDP strategy sought to improve the vibrancy and vitality of the retail centres with the classification of primary and secondary retail frontages within recognised Town Centre Areas to improve facilities and ensure the town centres remain attractive shopping destinations. Supporting policies focused on making the retail centres more resilient and able to compete more effectively with out-of-County retail centres and the growth of internet shopping.

Policy R1 - New Retail Development defined a retail centre hierarchy which recognised the specific role and function of the current retail offer within the County and as a framework for determining future development proposals. The Retail Hierarchy for Powys consists of three tiers of provision. The differences between the levels of the hierarchy are determined by a number of factors

- The number, type and range of shopping services provided by the centre;
- The character and attractiveness of the centre;
- The size of its catchment area; and

---

[1] Powys Retail Study, September 2012, Nathaniel Lichfield & Partners

- Accessibility by means of different transport modes.

Table 1: Adopted LDP Town Centre Hierarchy

Area Retail Centres:	Llandrindod Wells, Llanidloes, Machynlleth, Newtown and Welshpool.
District Retail Centres:	Builth Wells, Knighton, Presteigne, Rhayader and Ystradgynlais.
Local Retail Centres:	Llanfair Caereinion, Llanfyllin, Llanwrtyd Wells and Montgomery.

Area Retail Centres: The largest retail centres in the County are accessible to a wide range of transport modes, containing a wide range of retail outlets, financial and professional services, both nationally and locally owned. They serve not only their resident population, but also a wide catchment area due to the nature of retail facilities and services they offer. Settlements categorised as Area Retail Centres are therefore considered to be strategically important in terms of their retail and service provision and best suited to accommodate large new retail developments.

District Retail Centres: These provide significant retail facilities for their immediate hinterlands and for visitors to the area but do not perform the wider role of Area Retail Centres. They have a good range of shops and services and whilst capable of satisfactorily accommodating modest new retail developments, are less well suited to larger developments.

Local Retail Centres*:* These tend to have lesser catchment areas and are generally characterised by either a very compact retail area or a dispersal of several shops. They offer a limited range of facilities and services, including banking and postal services, many of which are essential for day to day basic needs and for the successful operation of local businesses. They often form the focal point to the community, with community facilities located either within or close to the Town Centre Areas.

Within each of the Area, District and Local Retail Centres in the retail hierarchy, a defined Town Centre Area has been identified.

The Replacement Local Development Plan

The RLDP is at a relatively early stage of preparation and the current retail hierarchy will be reviewed based on evidence from this document and roles will be explored for the town centres given that the change in people's shopping habits means town centres need to diversify and broaden their offer to create footfall. Town centres need to have clear roles so they do not compete against each other, but policy must also be flexible.

Steps to enhance the vitality and attractiveness of the town centres indicates that the town centre area boundaries will be reviewed and drawn in recognition of the need for a degree of flexibility in maintaining occupancy and footfall and to enable a tailored approach to be taken for each centre having regard to health checks placemaking and investment plans.

5 Town Centre Trends

The Powys Retail Study Addendum 2015 considered changes in the retail sector nationally and the implications for Powys. At the time the economic downturn had a significant impact on the retail sector. Several national operators had failed (e.g. Woolworths and Peacocks), leaving major voids within centres and retail parks.

This trend has not had a significant impact on Powys because most of the affected businesses did not have stores within the County. Many town centre development schemes were delayed and some of the main food store operators had seen a reduction in growth. The economic downturn and forecasts suggested that past rates of growth were unlikely to be achieved in the short term (5 years), but the underlying trend over the medium (5 to 10 years) and long terms (beyond 10 years) was expected to pick up again.

New forms of retailing (e.g. multi-channel shopping) had continued to grow, as an alternative to more traditional shopping. Home/electronic shopping had increased with the growth in the use of personal computers, smart phones and the internet. Click and collect shopping had become more popular. The future growth of multi-channel retailing including home computing, internet connections and interactive TV were expected to continue to influence retailing in the high street and from traditional stores. On-line shopping had experienced rapid growth since the late 1990s but in proportional terms remained a relatively low percentage of total retail expenditure (about 12% of all retail expenditure).

The period since 2015 has confirmed that several the trends witnessed at that time, were not just the result of the economic recession but represented permanent changes in the way people shop. The on-going threats to individual retailers and to the UK's town and city centres continue to be the subject of much study and debate. This includes recognition by the UK and Welsh Governments, with the launching of their respective 'Levelling Up' and 'Transforming Towns' initiatives.

However, the speed of change has increased dramatically over recent decades and many town centres are now struggling to transform in response to the structural changes they are experiencing. These include:

- the unprecedented growth of online shopping
- too much surplus retail space
- individual stores being too big for current retailer needs; and
- fragmented property ownership retailers face high fixed costs including business rates and rent

In practice there have been a considerable range of factors affecting town centres and many of the trends seen to date were expected to continue in the future, even before the impact of Covid-19 pandemic.

The factors include:

- Growth in the amount and range of retail goods and service purchases being made online and a corresponding fall in footfall within centres;
- Food and grocery development concentrated on smaller, convenience store and 'discounter' outlets to reflect changing consumer shopping patterns. There is also less loyalty to a single retailer, with the discounters in particular benefitting from regular, if not weekly shopping trips from an increasing number of customers;
- Comparison retailers rationalising their physical store portfolios both in and out of centre;
- Those retailers seeking to expand are often in the discount/value sector and are seeking cheaper, larger units for the sale of a mix of products, often including some bulky goods;
- Continued demise of many well-known and established retail brands;
- Increased spend on eating out and socialising, although in different types of venue to the traditional 'public house', including experiential leisure venues; and
- Increased demand in some retail service sectors, such as tattoo parlours and nail and beauty parlours, where the physical presence of the customer is required.

Independent retailers have generally been more resilient, with the decline in the convenience, comparison, service and leisure sectors being lower than for multiples. There has also been growth of opportunistic retailers, who have been able to expand into newly vacated properties; and the leisure/hospitality industry has continued to face challenges post pandemic, including the shortage of skilled staff.

Other factors that have been affecting town centres in the last few years following the pandemic include:

- The rise of working from home –the reduction in the number of office workers in larger town and city centres has had an impact on footfall levels and spend profiles. In contrast, smaller and commuter towns have experienced some growth because of the increase in local spend linked with home working.

- Home/electronic shopping –the pandemic drove an increase in internet sales and a shift away from in-person shopping but much of this trend has reversed, leaving internet shopping at a similar level as pre-pandemic around 25%

- Vacancies – the 2021 peak vacancy rates consistently have declined and are now broadly in line with pre-pandemic levels at around 16%. (Local Data Company data for the Welsh Retail Consortium)

- Independent businesses – Growth in the number of independent businesses during the pandemic which has continued post-pandemic. There are signs of slowdown with the growing cost of operating businesses and a wider inflationary environment.

- Period of high inflation – Inflation has rapidly risen since 2021 and peaked at above 10%. Prices of most goods and services have risen, increasing living costs and reducing consumers' discretionary spending. Similarly, the cost of operating a high street business has increased significantly with energy costs soaring and is having an impact on store viability.

- Ability to recruit staff –labour shortage with most businesses sectors reporting challenges in recruiting staff. This has been most pronounced in the hospitality sector and is having a knock-on effect on businesses' growth and store openings. (Survey by UK Hospitality)

6 Assessing the Town Centre Hierarchy

PPW states that planning authorities should establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposals map. Drawing on the findings from the town centre health checks and wider evidence base, our review has:

- Examined size, scale, form, function and location of the retail and commercial centres.
- Reviewed each centre by type using current and alternative definitions.
- Examined strategic plans and initiatives about the spatial component influencing the hierarchy including the National Plan, Growth Deal, Regional Economic Framework and other Powys economic strategies.

PPW also requires planning authorities to consider strategies in adjoining authorities, and in this case, this study has examined relevant documents from Ceredigion, Carmarthenshire, Gwynedd, Bannau Brecheiniog, Snowdonia, Flintshire, Wrexham, Neath Port Talbot, Herefordshire and Shropshire.

Carmarthen, Bangor, Shrewsbury and Hereford are recognised as regional retail centres within their respective development plans – in the case of Carmarthen in a deposit rather than adopted development plan.

Powys sits in the Mid Wales Region with Ceredigion and the BBNPA (in Powys). The joint regional Retail Capacity Study forms part of the evidence base for Ceredigion's Replacement LDP and recommends adopting a regional retail hierarchy that classifies Aberystwyth as a sub-regional retail centre. The Study provides a framework for establishing a regional retail hierarchy that recognises the regional role and function of larger settlement(s) in predominantly rural areas. This study has drawn from the approach adopted by Ceredigion to review the Powys town centre hierarchy (Table 2) as part of the RLDP.

Figure 1: Ceredigion Regional Retail Hierarchy RLD

Sub Regional Centres	Ceredigion is made up of 6 main towns, a range of smaller towns and larger villages followed by a plethora of smaller villages Aberystwyth is identified as the largest and most varied shopping facilities acting as a regional centre for the mid Wales area.
Primary Towns	
Secondary Towns	
Tertiary Town Centres	
Local Service Towns	

Strategic policy

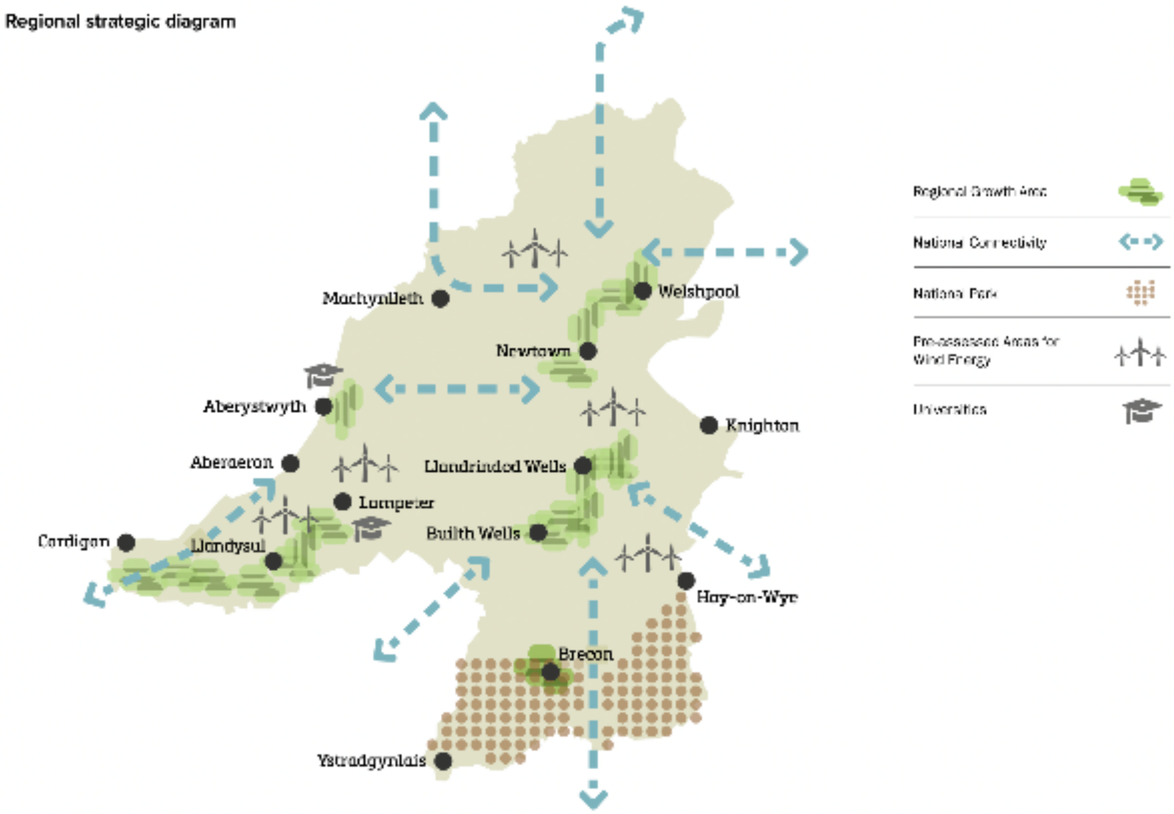
Future Wales supports sustainable growth and development in a series of inter-connected towns across the Mid Wales region known as Regional Growth Areas. These areas have been identified to meet the regional housing, employment and social needs of Mid Wales and places a specific emphasis on the importance of these towns. The two Regional Growth Areas (shown in Figure 2) of importance to the hierarchy are:

- The Heart of Wales, including Llandrindod Wells, Builth Wells and Rhayader[2]
- Bro Hafren, including Welshpool, Newtown and Llanidloes

.

[2] The towns included in the Growth Areas have been confirmed with Welsh Government by Powys CC.

Figure 2: Regional Strategic Diagram (Source: Future Wales)



The Mid Wales Growth Deal, Mid Wales Regional Economic Framework, Powys Well-being Plan and the Council's Corporate Improvement Plan have been reviewed and whilst these plans do not specify the spatial significance of individual towns, the importance of Newtown has been identified as the largest town in Powys and one of two main urban centres for the Mid Wales region.

Scale and diversity

Table 2 shows the total number of commercial units found within each defined town centre by business category identified within the town centre health checks. It has been used as a starting point and to inform the assessment of town centre hierarchy in terms of scale and diversity. The evidence highlights that both Newtown and Welshpool are approximately 50% larger than the other Area Retail Centres in Powys, and in terms of scale alone are considered to fall within their own level of the hierarchy.

The other key finding is that Builth Wells (identified as a District Retail Centre In the adopted LDP - Table 1) is like higher order Area Centres in terms of its scale and diversity. In comparison to Llandrindod Wells, Builth Wells is considered to be more diverse and balanced in the range of town centre uses.

Table 2: Total number of commercial units by retail centre and business category

	Comparison	Convenience	Leisure	Service	Vacant	Total
Newtown	44	13	38	45	32	178
Welshpool	62	9	31	43	19	170
Llanidloes	25	9	23	10	18	86
Llandrindod Wells	19	4	9	25	11	72
Machynlleth	29	6	11	14	5	65
Builth Wells	20	6	18	12	7	63
Rhayader	16	5	10	10	0	41
Knighton	14	3	10	10	2	39
Ystradgynlais	11	6	7	10	0	35
Llanfyllin	7	5	8	7	0	28
Presteigne	9	5	7	5	1	27
Montgomery	5	1	9	3	0	18
Llanfair Caereinion	1	3	4	6	1	15
Llanwrtyd Wells	3	2	6	1	2	14

The evidence finds that **Newtown** and **Welshpool** provide the largest and most varied shopping facilities. The difference between Newtown and Welshpool is the former has a regional role including an administrative centre for Welsh Government and Powys County Council. The Newtown town centre is also strategically important in terms of its provision of modern office and retail floorspace and considered in hierarchy terms to be of the same level of importance for mid Wales as Aberystwyth.

Recommended revised town centre hierarchy.

This study has reviewed the Powys LDP town centre hierarchy based on the planning policy and guidance, the scale and diversity of centres as has been set out in the individual town centre health checks (Appendix A). These take into consideration the whole retail offer including, for example, edge of town supermarkets. Although the current hierarchy was considered to be generally robust it was found to benefit from an update to reflect a regional approach.

The study finds **Newtown** has distinctive characteristics and is more appropriately categorised as a Sub-Regional Centre in alignment with Aberystwyth in Ceredigion. In addition, the study identifies that Powys has five primary towns (Table 4)

Welshpool, Llanidloes, Llandrindod Wells, Machynlleth and Builth Wells serving large spatial areas and meeting the needs for shopping and local services not met within secondary and local towns. Secondary towns include **Rhayader, Knighton, Ystradgynlais** and **Presteigne** are of smaller scale and have smaller local catchments typically meeting local needs with some specialised provision. This hierarchy is supplemented by local towns and larger villages which may provide essential items required to meet day to day needs including **Llanfyllin, Montgomery, Llanfair Caereinion and Llanwrtyd Wells.**

Figure 3: Analysis of the town centre hierarchy proposed by this Study

Town Centre	Regional Growth Area	Current LDP Town Centre Hierarchy	Proposed hierarchy with new definitions
Newtown	✓	Area Retail Centre	Sub Regional Centre
Welshpool	✓		Primary Town
Llanidloes	✓		
Llandrindod Wells	✓		
Machynlleth			
Builth Wells	✓	District Retail Centre	
Rhayader	✓		Secondary Town
Knighton			
Ystradgynlais			
Presteigne			
Llanfyllin		Local Retail Centre	Local Town
Montgomery			
Llanfair Caereinion			
Llanwrtyd Wells			

7 Town Centre Health Checks & Boundary Reviews

Health checks have been undertaken for the fourteen retail centres in Powys to inform the assessment of the hierarchy as well as the defined town centre boundaries. The findings are set out in **Appendix A** and have utilised the results from the Local Data Company town centre surveys as well as new data collected from additional survey and site visits.

PPW states the need to define town centres with boundaries reflecting their function, size, scale, form and location. The guidance, supported by Future Wales, also recognises the need for the health and vibrancy of the centre to reflect their multi-functional nature and the focus of growth and regeneration. Changes to the defined town centre boundary are encouraged and have been reviewed as part of this study (Appendix A) to ensure the right balance of use and activity are being achieved. The types of other uses considered to be complementary to retail and therefore appropriate in retail and commercial centres include:

- Financial and professional services (A2);
- Food and drink (A3);
- Offices (B1);
- Hotels (C1);
- Educational and other non-residential establishments (D1);
- Leisure (D2); and
- Other uses such as launderettes and theatres

Most town centres face development pressures, whether from edge and out of centre developments or the change of use and loss of activity from the high street. Centres of different scale and function in the hierarchy also have different scale of opportunities with the potential to support their regeneration, growth and the 'town centre first' approach.

Higher order centres in the revised hierarchy include sub-regional centres and primary towns would normally benefit from widely drawn town centre boundaries closely reflecting the multi-functional nature and wide range of the uses accommodated and allowing for their potential growth and regeneration in line with the town centre first approach. Within these larger town centres, the most important areas will need to be protected with primary and secondary shopping frontage areas policies (to be reviewed at a future stage).

Lower order secondary and local towns are smaller and serve a more localised area and are likely to face less pressure from edge and out of town developments. However, these town centres are likely to need protecting to ensure their character and concentration of current uses are maintained and regenerated.

43A Frogmore Street,
Abergavenny, NP7 7AN
Wales