



Complete Agenda



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

Democratic Service
Swyddfa'r Cyngor
CAERNARFON
Gwynedd
LL55 1SH

Meeting

JOINT PLANNING POLICY COMMITTEE

Date and Time

10.00 am, FRIDAY, 12TH MARCH, 2021

***A meeting of the Joint Local Development Plan Panel will follow this meeting**

Location

Virtual Meeting

Contact Point

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(DISTRIBUTED Thursday, 4 March 2021)

JOINT PLANNING POLICY COMMITTEE

MEMBERSHIP

GWYNEDD

Councillors

**Anne Lloyd Jones,
Berwyn Parry Jones,
Gareth Griffith,
Gareth A Roberts,
John Pughe Roberts,
Paul Rowlinson,
Owain Williams**

Isle of Anglesey

Councillors

**Richard Dew,
John Griffith,
Kenneth P Hughes,
Aled Morris Jones,
Richard O. Jones,
Nicola Roberts,
Robin Williams**

A G E N D A

1. APOLOGIES

To receive any apologies for absence

2. DECLARATION OF PERSONAL INTEREST

To receive any declaration of personal interest.

3. URGENT BUSINESS

To note any items that are a matter of urgency in the view of the Chairman for consideration.

4. MINUTES

4 - 5

The Chairman shall propose that the minutes of the meeting of this committee held 29 January 2021 be signed as a true record.

5. SUPPLEMENTARY PLANNING GUIDANCE (SPG) FOR ADOPTION: TOURIST FACILITIES AND ACCOMMODATION

6 - 90

To consider and approve the proposed responses to observations on the Supplementary Planning Guidance – Tourist Facilities and Accommodation, and adopt the Guidance

Agenda Item 4



JOINT LOCAL DEVELOPMENT PLAN

Joint Planning Policy Committee

10:00am 29th January 2021

Virtual Meeting

Present:

Isle of Anglesey County Council

Cllr Richard Dew
Cllr John Griffith
Cllr Kenneth P Hughes
Cllr Robin Williams

Gwynedd Council

Cllr Anne Lloyd Jones
Cllr Gareth Griffith
Cllr John Pughe Roberts
Cllr Paul Rowlinson
Cllr Owain Williams
Cllr Gareth Roberts

Officers:

Dewi Francis Jones	Chief Planning Officer (IACC)
Gareth Jones	Assistant Head, Environment (GC)
Rebeca Jones	Planning Policy Manager (JPPS)
Heledd Jones	Team Leader - (JPPS)
Robyn Jones	Legal Services Manager (IoACC)

Apologies:

Councillor Berwyn Parry Jones
Councillor Richard Owain Jones

1. APOLOGIES

Apologies as noted above.

2. DECLARATION OF PERSONAL INTEREST

There were no declarations of personal interest.

3. URGENT ITEMS

No urgent items were received.

4. MINUTES

The minutes of the Committee held on 4th September 2020 were accepted as a true record.

5. SUPPLEMENTARY PLANNING GUIDANCE: CHANGE OF USE OF COMMUNITY FACILITIES AND SERVICES, EMPLOYMENT SITE AND RETAIL UNITS

Heledd Jones gave a short presentation outlining the journey of the SPG so far. It was noted that the public consultation was undertaken between October and November 2020.

During the public consultation period 10 individual observations were received (these can be seen in appendix 1 of the report). It was noted that a full copy of the SPG was included in appendix 2, which incorporated some of the amendments suggested following public consultation.

Matters raised:

- As a result of Covid and Brexit shops are closing rather than new ones opening. It is very important that we are flexible with small businesses moving forward. There may well be big problems as a result of Brexit in particular.
- Happy with the SPG but want to note that there are many shops closing and this will need considering moving forward.

Response:

- Comments were noted

Decision

To approve the proposed response to the observations on the Supplementary Planning Guidance and adopt the Change of use of community facilities and services, employment site and retail units SPG.

Ends

Agenda Item 5

ITEM 5

MEETING	Joint Planning Policy Committee
DATE	12 March 2021
NAME	Supplementary Planning Guidance: Tourist Facilities and Accommodation
PURPOSE	To consider and approve the proposed responses to observations on the Supplementary Planning Guidance – Tourist Facilities and Accommodation, and adopt the Guidance.
RECOMMENDATION	<p>The Committee is requested to -</p> <ul style="list-style-type: none"> (i) Approve the proposed response to the observations about the Supplementary Planning Guidance: Tourist Facilities and Accommodation (ii) Adopt the SPG: Tourist Facilities and Accommodation, which replaces the previous relevant SPG (Holiday Accommodation (GC) and Holiday Accommodation (IoACC)) (iii) Delegate the right to Officers to make minor editorial amendments to the document before its publication, as required.
AUTHOR	Heledd Jones, Team Leader, Gwynedd and Anglesey Joint Planning Policy Service

1. Introduction

1.1 The Planning Authorities have committed to preparing a series of Supplementary Planning Guidance to support the Joint Local Development Plan. This report presents:

- i. A Consultation Report and Register regarding the Supplementary Planning Guidance: Tourist Facilities and Accommodation (Appendix 1).
- ii. A copy of the final draft of the Supplementary Planning Guidance: Tourist Facilities and Accommodation (Appendix 2).

2. The public consultation and final draft Guidance.

2.1 During the process of preparing the Guidance in question, the Joint Development Plan Panel has been involved in scrutinising its content. Having received consideration from the Joint Local Development Plan Panel the Guidance was given the seal of approval by the Joint Planning Policy Committee to be released for a public consultation (spring/summer 2018). Following this original public consultation period and in light of the observations received, it was considered appropriate to make further amendments to the Guidance in relation to two specific matters, namely:-

- 1. How to define an over-provision of self-service accommodation, and;

2. How to deal with applications for change of use and loss of hotels.
 - 2.2 As the SPG will be a material planning consideration following its adoption, the Councils considered that it was important for stakeholders to have their say on these significant changes. Therefore, at a meeting of the Joint Planning Policy Committee on 26 October 2018, the release of a further consultation document for public consultation was approved.
 - 2.3 During the meeting of the Joint Local Development Plan Panel held on 22 March 2019, the Consultation Report on this further consultation was presented, which noted that no further amendments to the Guidance were necessary as a result of the observations received during the period of further consultation, and requesting the right to submit the Guidance to a meeting of the Joint Planning Policy Committee for adoption.
 - 2.4 Following the meeting of the Joint Planning Policy Committee (March 2019), the Guidance was submitted to Gwynedd Council's Communities Scrutiny Committee on 4 April 2019. In light of the discussion at this meeting, it was considered appropriate to make a minor amendment to the wording of the Guidance. Furthermore, after receiving appeal decisions pertaining to the assessment of 'over-provision' of holiday accommodation, it became evident that a further amendment to the Guidance was needed.
 - 2.5 Because of the circumstances associated with preparing the Guidance, the Joint Planning Policy Committee has not had the opportunity to approve the proposed response to the second consultation period. The table showing the Council's response to the second consultation period is included in Appendix 1 (see appendix 2 of the document).
 - 2.6 A draft version of the revised SPG was approved for public consultation by the Joint Planning Policy Committee on 4 September, 2020. This draft was prepared in consultation with relevant officers from both Authorities. Prior to this, the SPG was reviewed by the Joint Local Development Plan Panel on 24 January 2020.
 - 2.7 The SPG was subject to a public consultation from 16 October to 27 November 2020.
 - 2.8 It is noted that the main amendment to the Guidance which led to the third consultation period related to making a further amendment to the definition associated with over-provision of holiday accommodation. The definition (see section 4.6 of the Guidance in Appendix 2) now includes a specific threshold in terms of when there is considered to be an over-provision of self-catering holiday accommodation within a particular area. In accordance with the revised direction within the Guidance, favourable consideration cannot be given to applications for self-catering holiday accommodation when the combined current rate of self-catering holiday accommodation and second homes has already reached the threshold of 15% of all the housing stock. It is considered that the setting of a definitive threshold will make it easier for Officers to assess 'over-provision' in the context of the requirement noted in Policy TWR 2 of the JLDP.
3. **The Communities Scrutiny Committee and the Partnership and Regeneration Scrutiny Committee (Isle of Anglesey County Council)**
 - 3.1 At the request of the Communities Scrutiny Committee (Gwynedd Council), the Guidance was submitted to the Committee for scrutiny. We originally reported to the Scrutiny Committee during

April 2019 following the second consultation period, and we then reported on the Guidance to them on 25 February, 2021. Because of the procedure of reporting on the Guidance in Gwynedd, this good practice was followed by also reporting on its contents to the Isle of Anglesey County Council's Partnership and Regeneration Scrutiny Committee.

3.2 The purpose of this process was to raise awareness amongst the members of both Scrutiny Committees of the development of the Supplementary Planning Guidance: 'Tourist Facilities and Accommodation' and ensure that the Guidance along with the relevant Consultation Report were scrutinised.

3.3 The following matters were identified during the meeting of the Partnership and Regeneration Scrutiny Committee (IoACC):-

- The ability of the threshold set in the Guidance to have control over the provision of holiday accommodation in coastal areas.
- Concern regarding the lack of responses to the consultation period, especially given the field it dealt with.
- General concern regarding the misuse of garages/houses for use as holiday accommodation.
- Questioned the purpose and status of Supplementary Planning Guidance in general

3.4 The following matters were noted by the Communities Scrutiny Committee:-

- Concern as to how the planning policy within the Joint Local Development Plan deals with touring and static caravan sites.

3.5 We note that both committees approved the report that was submitted to them.

4. Sustainability Assessment and Habitats Regulations Assessment

4.1 A screening assessment was undertaken to determine whether this Guidance should be the subject of a Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC and the associated Environmental Assessment of Associated Plans and Programmes Regulations 2004. A Habitat Regulations Assessment (HRA) of plans and programmes which could affect sites of international importance is one of the requirements of the Habitats Directive (92/42/EEC). Therefore, the Guidance was assessed to determine whether a full, appropriate assessment was required under the Habitats Regulations.

4.2 The Regulations notes the process for Authorities to undertake a screening opinion. As the Guidance supports policies that have been the subject of a SEA, the conclusion was that the Guidance was not required to be subject to a SEA. The Plan's policies were assessed under the Habitats Regulations and it was concluded that an Appropriate Assessment of the Plan was not needed. As the Guidance supports some of those policies, the screening assessment referred to in paragraph 3.1 above concluded that an Appropriate Assessment of this Guidance was not required.

4.3 In accordance with the processes for the above-named Regulations, the screening assessment was sent to Natural Resources Wales and CADW, namely the specific environmental statutory bodies. These bodies had to express their views within a five-week period.

4.4 This process has led to a decision that the Councils' screening assessment is accurate, and, therefore, there is no need for a SEA or Appropriate Assessment of the Guidance. A Screening Statement will be published accordingly.

5. National Planning Policy Guidance

5.1 On 24 February 2021 a revised version of Planning Policy Wales was published, which is the 11th Edition. The National Planning Policy guidance in relation to tourism remains unchanged within the revised version of Planning Policy Wales, however, it is noted that the Guidance has been amended to ensure that correct references are made to sections of the current National Planning Policy guidance as applicable.

5.2 Also, on the same day 'Future Wales: The National Plan 2040' was published. A paragraph has been added to the Guidance (para 2.1) that refers to the National Plan in the context of the guidance given in relation to tourism.

6. Next steps

6.1 Following its adoption, the Guidance will be a material planning consideration.

6.2 A copy of the final Guidance will be available to view on the websites of both Councils and a hard copy will be available to view at the offices of both Planning Services and at the office of the Joint Planning Policy Service when restrictions allow.

6.3 A copy of the Public Consultation Report will be available to view on the websites of both Councils and a hard copy will be available to view at the offices of both Planning Services and at the office of the Joint Planning Policy Service when restrictions allow.

6.4 A copy of the Sustainability Assessment and Habitats Regulations Assessment Screening Statement will be available to view on the websites of both Councils and a hard copy will be available to view at the offices of both Planning Services and the office of the Joint Planning Policy Service when restrictions allow.

6.5 We will inform everyone who contributed to the public consultation of the decision to adopt this Guidance.

7. Recommendation

7.1 The Committee is asked to -

- (iv) Approve the proposed response to the observations on the Supplementary Planning Guidance: Tourist Facilities and Accommodation
- (v) Adopt the SPG: Tourist Facilities and Accommodation, which replaces the previous relevant SPG (Holiday Accommodation (GC) and Holiday Accommodation (IoACC))
- (vi) Delegate the right to Officers to make minor editorial amendments to the document before its publication, as required.

APPENDICES:

Appendix 1: Public Consultation Report on the Supplementary Planning Guidance: Change of use of community facilities and services, employment sites and retail units

Appendix 2: Supplementary Planning Guidance: Change of use of community facilities and services, employment sites and retail units

**TOURISM FACILITIES AND ACCOMMODATION
SUPPLEMENTARY PLANNING GUIDANCE**

**CONSULTATION REPORT AND OFFICER'S
RECOMMENDATIONS ON THE FURTHER
PROPOSED CHANGES DOCUMENT**



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

MARCH 2021

Contents

1.0	BACKGROUND	3
	Purpose of Supplementary Planning Guidance (SPG).....	3
	The Policy Context	3
	The need for Supplementary Planning Guidance	3
	The Status of Supplementary Planning Guidance.....	3
2.0	TOURISM FACILITIES AND ACCOMMODATION SUPPLEMENTARY PLANNING GUIDANCE.....	4
	Public Consultation	4
	APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND OFFICERS’ RECOMMENDATIONS (OCTOBER/NOVEMBER 2020 CONSULTATION PERIOD)	6
	APPENDIX 2 – SUMMARY OF COMMENTS RECEIVED AND OFFICERS’ RECOMMENDATIONS (DECEMBER 2018 TO JANUARY 2019)	Error! Bookmark not defined.

1.0 BACKGROUND

Purpose of Supplementary Planning Guidance (SPG)

- 1.1 The Purpose of SPGs are to:
- assist the applicants and their agents in preparing planning applications and in guiding them in discussions with officers about how to apply relevant policies in the Joint Local Development Plan before submitting planning applications,
 - assist officers to assess planning applications, and officers and councillors to make decisions about planning applications
 - help Planning Inspectors make decisions on appeals.
- 1.2 The general aim is to improve the quality of new developments and facilitate a consistent and transparent way of making decisions that align with relevant policies in the Joint Local Development Plan.

The Policy Context

Local Development Plan

- 1.3 Under planning legislation, the planning policies for every area are contained within the 'development plan'. The Gwynedd and Anglesey Joint Local Development Plan was adopted on 31 July 2017. It relates to the Gwynedd and Anglesey Planning Authority areas.
- 1.4 The Plan provides wide-ranging policies along with allocations for the main land uses, such as housing, employment and retail; it will help shape the future of the Plan area physically and environmentally, and will also influence it economically, socially and culturally. The Plan, therefore:
- enables the Local Planning Authorities to make rational and consistent decisions on planning applications by providing a policy framework that is consistent with national policy; and
 - guides developments to suitable areas during the period up to 2026.

The need for Supplementary Planning Guidance

- 1.5 Although the Plan contains policies that enable the Local Planning Authority to make consistent and transparent decisions on development applications, it cannot provide all the detailed advice required by officers and prospective applicants to steer proposals locally. In order to provide this detailed advice, the Councils are preparing a range of SPGs to support the Plan that will provide more detailed guidance on a variety of topics and matters to help interpret and implement the Plan's policies and proposals.

The Status of Supplementary Planning Guidance

- 1.6 Supplementary Planning Guidance (SPG) will be material planning considerations during the process of assessing and determining planning applications. Welsh Government and the Planning Inspectorate will place considerable weight on supplementary planning guidance that stem from , and are consistent with, a development plan. The SPGs cannot introduce any new planning policies or amend existing policies.

1.7 Once it has been adopted a SPG should, therefore, be given substantial weight as a material planning consideration.

2.0 TOURISM FACILITIES AND ACCOMMODATION SUPPLEMENTARY PLANNING GUIDANCE

2.1 The SPG covers all forms and scales of holiday accommodation and tourism attractions. Tourism is a dynamic sector and is subject to continuous change. It plays a significant role in the plan area's economy. The visitor economy provides jobs, services and facilities that are essential to the well-being and enjoyment of local communities and residents in the plan area. The importance of tourism can be seen in the table1 below:

2017	Gwynedd*	Anglesey
Total economic impact of tourism	£1.06 billion	£304.23 million
Total visitor numbers (millions)	7.28	1.71
Number of staying visitors (millions)	3.53	1.03
Number of day visitors (millions)	3.75	0.68
Number of FTE2 jobs supported by tourism spend	15,601	4,102

*includes Snowdonia National Park

2.2 Both Anglesey and Gwynedd benefit from extensive natural and cultural assets that offer considerable potential for residents and visitors to enjoy. However new tourism developments can have a negative impact upon the local environment and communities if they are insensitively developed or inappropriately located.

2.3 Both Gwynedd Council and the Isle of Anglesey County Council are committed to the principles of sustainability and the Joint Local Development Plan has sustainable development at its core and recognises that all development in the plan area should embody these principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of the plan area.

Public Consultation

2.4 The draft Tourism Facilities and Accommodation Supplementary Planning Guidance (SPG) was originally the subject of a public consultation exercise between the 17th May and the 28th June, 2018. The Councils considered all representations that were received during the original public consultation.

2.5 Most of the changes to the SPG that are considered necessary to respond to issues raised in representations are minor changes that do not lead to any significant changes to the SPG. However, it was considered that representations received on two issues required relatively significant changes to the SPG. These issues were:

1. How to define overconcentration of self-catering accommodation, and;
2. How to deal with applications for the change of use and the loss of hotels.

2.6 As the SPGs will become material planning considerations once adopted, the Councils consider that it is important for stakeholders to have their say in these significant changes before the

¹ STEAM Report 2017

² FTE = Full Time Employment

SPG is adopted and approved the release of a further consultation document for public consultation in the meeting of the Joint Planning Policy Committee on the 26 October 2018.

- 2.7 A total of 8 comments were received: 2 in support of the proposed changes and 6 objections. During a meeting of the Joint Local Development Plan Panel held on 22 March, 2019 the Consultation Report following this further consultation was reported, noting that no further changes would need to be made to the Guidance in light of the comments received during the further consultation period and requesting the right to present the Guidance to the Joint Planning Policy Committee for adoption (see Appendix 2 attached which includes a summary of the comments received and the Councils response).
- 2.8 Since the meeting of the Joint Planning Policy Panel (March, 2019) the Guidance has been presented to Gwynedd Council's Communities Scrutiny Committee on 4 April, 2019. As a result of the discussion held during this meeting it was considered appropriate to make further amendments to the wording of the Guidance. Further, recent appeals decision relating to the considerations associated with the assessment of 'overprovision' of holiday accommodation have highlighted the need to make a further amendment to the Guidance.
- 2.9 A draft of the SPG was approved for public consultation by the Joint Planning Policy Committee on September 4, 2020. This draft has been prepared in consultation with relevant officers from both Authorities. Prior to this, the SPG was reviewed by the Joint Local Development Plan Panel on January 24, 2020.
- 2.10 The SPG was the subject of a public consultation period between 16th October and 27th November, 2020.
- 2.8 Details of the public consultation were placed on both Council's websites and emails/ letters were sent to all Councillors, Community Councils, planning agents, statutory consultees, environmental bodies, neighbouring authorities and those who had made previous comments and declared an interest in the SPG.
- 2.9 A number of platforms were available for interested parties to respond to the consultation which were:
- Online word and pdf response form - available on both websites and
 - Paper copies were made available in all libraries and Siop Gwynedd and also available on request from the JPPU
 - Email
 - Letter
- 2.13 A total of 15 valid comments were received. Detailed consideration was given to all representations received. Further, it is noted that 8 invalid comments have been received (see second table in appendix 1). As these comments relate to parts of the document that were not subject to the public consultation period no further consideration has been given to these comments.
- 2.14 The following section (Appendix 1) summarises the comments received, including the Councils' response to them and, where appropriate, recommends any changes required to the SPG in light of the comment. Any proposed change to the wording of the CCA is noted in an **underlined bold font**.

APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND OFFICERS’ RECOMMENDATIONS (OCTOBER/NOVEMBER 2020 CONSULTATION PERIOD)

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
1.	Support	Llanengan Community Council	Section 4.6	<p>Support the proposed changes unanimously.</p> <p>The inclusion of the sentence "Furthermore, it is noted that consideration should be given to the rate of second homes within a community" applies very much to the Llanengan community given that over 50% of Abersoch houses alone are second homes. Reference to AirBnB is also supported because there are so many of them.</p> <p>It is concerns at all Council meetings when discussing planning applications that the owners are expanding to expand the self catering facilities in order to attract more 'heads'. As a result this reduces the availability of 'affordable' housing and increases their value beyond the grasp of local residents.</p>	<p><u>RECOMMENDATION</u> – Accept the supporting comment.</p>
2.	Objection	Bourne Leisure	4.6.1-4.6.6	<p>Draft paragraphs 4.6.1- 4.6.6 seeks to include additional criteria within section 4.6 to help define overconcentration of self-catering accommodation within communities. The criteria proposed within section 4.6 has a focus on controlling self-catering units within communities/settlements (e.g. Airbnb and holiday lets). Bourne Leisure has no objection to this in principle, but the Company is keen to ensure that the criteria would not have unintentional consequences by also being applied to purpose-built holiday resorts such as those operated by Bourne Leisure should, if in the future, it wishes to introduce fixed base self-catering accommodation within its established parks. We emphasise that Bourne Leisure’s potential future operations would not add to the saturation or clustering of self-catered accommodation/ Airbnb apartments within settlements which is what this section is trying to achieve.</p>	<p>The wording of the present Guidance is clear in terms of when the principles as contained in part 4.6 needs to be considered when assessing TWR 2 applications. If there was an application for permanent holiday accommodation, meaning a structure that would be built on the site and cannot be dismantled and re-built in another location, regardless of being located in a holiday park would still have to comply with the principles of Policy TWR 2 and the associated SPG.</p> <p><u>RECOMMENDATION</u> – No change</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation	
Page 16				<p>We therefore request that it is made explicit in the new wording that the criteria do not apply to existing holiday parks or complexes where the sole purpose of the park is to provide holiday accommodation and associated facilities. To achieve this, we suggest that paragraph 4.6.2 is amended as follows (rewording underlined and in bold)</p> <p>“Examples of this type of accommodation include self-catering holiday accommodation (including Airbnb) along with dedicated holiday accommodation (i.e. permanent units that have been granted planning permission for the purpose of holiday use). <u>This type of accommodation does not include self-catering units located within Holiday parks or complexes....</u>”</p> <p>To ensure clarity, we also recommend the following addition to draft paragraph 4.6.6 (rewording underlined and in bold):</p> <ul style="list-style-type: none"> • <u>A proposal located within an existing holiday park or complex”.</u> 		
	3.	Objection	Cadnant Planning Ltd.	4.6.1	<p>Policy TWR 2 does not specifically read that development should not lead to an excess of self-catering holiday accommodation. It relates to self-catering and serviced.</p>	<p>Agree with the comment. In order to ensure consistency with the policy and relevant criteria it is recommended that the reference to self-catering is deleted.</p> <p><u>RECOMMENDATION – Amend the paragraph wording as follows:-</u></p> <p>“Policy TWR 2 (criterion 5) clearly states that no holiday accommodation provision should lead to an 'excess' of self-catering holiday accommodation in a specific area.”</p>
	4.	Objection	Cadnant Planning Ltd.	4.6.2	<p>Lack of housing supply is not directly linked with the provision of holiday units which are controlled for that purpose. It relates to dwellings which are used for holiday</p>	<p>The list of impact associated with holiday accommodation included in paragraph 4.6.2 are examples only. It is recognised that holiday units that receive specific planning</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				<p>purposes but are not controlled for that purpose by way of a condition.</p> <p>Second homes is predominantly the factor that leads to increased house prices rather than the provision of holiday units which are specifically controlled for that purpose.</p> <p>This should be clarified in the SPG.</p>	<p>permission for that purpose do not have a direct impact on house prices. However, an increase in the numbers of holiday accommodation and the growth of an area as a holiday destination can have a knock-on effect on the housing market increasing the demand for housing in the area which results in increasing prices.</p> <p><u>RECOMMENDATION</u> – No change</p>
5.	Objection	Cadnant Planning Ltd.	4.6.5	<p>The guidance in the SPG navigates such units to land within the development boundary/within settlements or sites which are close to those settlements. The guidance therefore will inevitably force such units into residential areas within settlements. There is a conflict here and a better balance needs to be struck.</p> <p>The same consideration applies to local businesses providing for the needs of visitors more than the needs of residents. If holiday units are being pushed towards settlements, this is the effect that will be realised.</p>	<p>The locational guidance within the Guidance conforms with the guidance contained in the policy and relevant criteria. Further, it is not considered that there is a conflict as Policy TWR 2 promotes new development within the boundary or suitable previously developed land (which includes sites outside the development boundary).</p> <p><u>RECOMMENDATION</u> – No change</p>
6.	Objection	Cadnant Planning Ltd.	4.6.5	<p>For clarity and transparency, the SPG should provide evidence to demonstrate why the figure of 15% has been selected. There is no explanation within the draft SPG to explain this. As this would introduce a threshold which is not currently set by adopted planning policy within the JLDP, the threshold should be robustly examined and scrutinised with an additional opportunity to consult and engage with planning agents and members of the public.</p>	<p>Criterion 'v' of Policy TWR 2 clearly states that holiday accommodation proposals should not lead to an overprovision of such accommodation. In order to define what is meant by 'overprovision' a specific threshold is set within the Guidance.</p> <p>Where there are high numbers of holiday homes, this can mean fewer families in the settlement throughout the year to use services such as schools, buses, post offices, and their viability may be threatened by low occupancy.</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					<p>Research work conducted by the Lake District as part of their Local Development Plan evidence base refers to two research papers in relation to the impact of holiday homes on communities. The first '<i>Housing: An Effective Way to Sustain our Rural Communities</i>' which states '<i>the percentage of holiday homes should not be more than 20 per cent as this appears to affect the sustainability of any village.</i>' The second report, '<i>The Cumbria Housing Strategy 2006/2011</i>' goes a step further through its 'Core Indicators', suggesting that the percentage should not exceed 10 per cent. The National Park Authority uses this information as a guide when examining the impacts that second homes have on the sustainability of any community.</p> <p>Further, when examining the communities in Gwynedd and Anglesey where the combined figure of second homes and holiday accommodation is more than 15% of the housing stock, there appears to be a pattern in terms of, higher house prices, impact on the Welsh language and lack of facilities for the local population.</p> <p>The figure of 15% as included in the SPG is therefore considered to be fully justified and reasonably.</p> <p><u>RECOMMENDATION</u> – No change</p>
7.	Support	Cadnant Planning Ltd.	4.6.6.	The recognition of exceptional circumstances are welcomed as otherwise the Plan will lead to an abundance of disused	<u>RECOMMENDATION</u> – Accept the supporting comment.

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				outbuildings which are capable of being re-used which would fall into disrepair.	
8.	Objection	Cadnant Planning Ltd.	4.6.6	If the enterprise has suitable PDL, what is the harm of including this?	<p>The exception in order to support a rural enterprise is made specifically to protect derelict out-buildings that may be re-used. It is noted that these should only be an exception and that there is a need to ensure that the LPA has full control over this exception.</p> <p>Further, it is noted that land where there was agricultural use is excluded from the definition of from previously developed land (Planning Policy Wales).</p> <p><u>RECOMMENDATION</u> – No change</p>
9.	Objection	Cadnant Planning Ltd.	4.6.6	<p>A legal agreement should not be unnecessarily restrictive. As per guidance set out in TAN 6 'Practice Guidance', regard should be had to the normal 'churning' of land assets through their sale and acquisition and the effect of doing so upon the operation of the enterprise.</p> <p>In order to deal with similar policy requirements, other LPA's use a condition to require the unit to be run and managed in association with the farm holding to include the Agricultural Holding Number of the farm. This is considered to be a more appropriate mechanism rather than a legal agreement.</p>	<p>The comment relating to the requirement not to be unnecessarily restrictive is noted. The appropriate mechanism will be used to ensure that the holiday accommodation is tied with the rural enterprise. For example the holiday accommodation may be legally bound by a condition or legal agreement.</p> <p><u>RECOMMENDATION</u> – No change</p>
10.	Support	Cyngor Cymuned Llanellian	4.6	Support the amendment to section 4.6.	<u>RECOMMENDATION</u> – Accept the supporting comment.
11.	Objection	Cyngor Tref Porthmadog	4.6.5.	Supportive of the change to clause 4.6 It is noted that applications for self-service holiday accommodation will not be given favourable consideration when a combination of the current number of holiday accommodation and second	The point that has been raised is fair, particularly in relation to the example referred to as there may be differences between settlements located within the Community/Town/City Council area.

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				<p>homes 'within the Community/Town/City council area' exceeds 15%.</p> <p>Porthmadog Town Council strongly supports this, but asks to consider adding 'within a county council ward' or 'within a particular settlement' to these definitions (it would not replace them). This is because the number of second homes may be significantly higher in one part of a community/town council area than in another. For example, in the Porthmadog Town Council area which includes Porthmadog, Tremadog, Borth-y-Gest and Morfa Bychan, the problem is considerably worse in Borth-y-Gest and Morfa Bychan than it is in other parts of the town council area. If the figure for the town council area happened to fall below 15% slightly, it may still be appropriate to implement this policy in those parts of the area that would be above the threshold.</p>	<p>It is therefore considered necessary to amend the Guidance to give greater flexibility and to enable the LPA to take account of a local area when considering the current provision of holiday accommodation in exceptional/special cases.</p> <p><u>RECOMMENDATION</u> – Amend the SPG as follows:-</p> <p>“Area</p> <p>4.6.3 The provision of holiday accommodation should be considered within the area/settlement where the proposal is located, along with the wider area. Council Tax figures in terms of second homes and non-domestic holiday accommodation (business rate) are based on Community/Town/City Council area. In some cases, especially rural areas which border with a neighbouring community/town/city council, or are clearly influenced by it, it will be appropriate to give consideration to the level of provision in that area as well. <u>Further, there could be examples of cases where there is a high number of holiday accommodation in a particular settlement/area within a Community/Town/City Council area. In such exceptions the LPA may consider the local provision (i.e. beyond Town/City Community Council level) if it is considered appropriate and fair to do so.</u>”</p> <p>Last bullet point of paragraph 4.6.5:-</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					<ul style="list-style-type: none"> Quantity of holiday accommodation - Favourable consideration will not be given to applications for self-serviced holiday accommodation when the existing combination of holiday accommodation and second homes within the Community/Town/City Council area is higher than 15%. Council Tax information should be used as the information source in order to find this information. <u>Exceptions may arise, where it is considered that there is a high level (more than 15%) of holiday accommodation in a particular settlement/area within a Community/Town/City Council. In such circumstances, consideration may need to be given to provision beyond the Community/Town/City Council level.</u>
12.	Objection	Rod Bulmer	4.6.5 (bullet point 6)	<p>Whilst I understand and am supportive of the drivers behind the overall policy to limit over-provision I believe the simplified use of 15% is incorrect and will lead to unintended consequences unless the figures itself is adjusted or alternatively section 4.6.6 is further updated to detail additional exceptional circumstances.</p> <p>The threshold of 15% has already been met in many communities in Gwynedd. The primary driver for meeting this threshold has been the conversion of existing residential properties to furnished self catering holiday let properties. This has been driven by the attraction of avoiding the council tax premium and in many circumstances moving the property on to a zero level of business rates due to the low rateable value.</p>	<p>The comment made in relation to the taxation system and the current incentive to transfer over to pay business tax is noted. Changing the taxation system would mean a change in primary legislation. However having control over holiday accommodation that require planning permission is the responsibility of the LPA, therefore setting the threshold as set out in the SPG would assist with that aim.</p> <p>Criterion 'v' of Policy TWR 2 clearly states that holiday accommodation proposals should not lead to an overprovision of such accommodation. In order to define what is meant by 'overprovision' a specific threshold is set within the Guidance.</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				<p>For people who genuinely converting existing run down buildings in to holiday accommodation the 15% threshold will stop this from happening. This will have detrimental local impact as follows:</p> <ul style="list-style-type: none"> - significant trade will be removed from the area - building, maintenance, hospitality - existing derelict buildings will remain in place as an “eyesore” - over time the attractiveness of the area for inward investment will be reduced <p>As such imposing the 15% threshold as proposed will to all intents and purposes stops new development and conversion of derelict properties whilst allowing the continued transfer of existing residential properties in to furnished self catering holiday lets.</p> <p>It is proposed that the this guidance (and potentially other guidance) is updated in one or more of the ways set out below to address the real issue and not penalise:-</p> <ol style="list-style-type: none"> 1. Additional Exceptional Circumstances - the exceptional circumstances list should be updated to allow a greater level of flexibility for local planning authorities where the threshold is exceeded. Where the individual case can be evidenced to show “a positive impact on the local area” then there should be flexibility. As an example were derelict buildings are being converted from not being used to create jobs and trade. 2. Include a tolerance - 15-20% - In areas where the 15% threshold is breached there should a be a tolerance (say up to 20%. This would feel fair and would allow control to be maintained without a “blanket refusal” policy which in certain circumstances will not be beneficial to the local area. 	<p>Where there are high numbers of holiday homes, this can mean fewer families in the settlement throughout the year to use services such as schools, buses, post offices, and their viability may be threatened by low occupancy.</p> <p>Research work conducted by Lake District as part of their Local Development Plan evidence base refers to two research papers in relation to the impact of holiday homes on communities. The first '<i>Housing: An Effective Way to Sustain our Rural Communities</i>' which states '<i>the percentage of holiday homes should not be more than 20 per cent as this appears to affect the sustainability of any village.</i>' The second report, '<i>The Cumbria Housing Strategy 2006/2011</i>' goes a step further through its 'Core Indicators', suggesting that the percentage should not exceed 10 per cent. The National Park Authority uses this information as a guide when examining the impacts that second homes have on the sustainability of any community.</p> <p>Further, when examining the communities in Gwynedd and Anglesey where the combined figure of second homes and holiday accommodation is more than 15% of the housing stock, there appears to be a pattern in terms of, higher house prices, impact on the Welsh language and lack of facilities for the local population.</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				3. Change Residential Property Transfer to Business Property so that Planning Permission is required before doing so. In reality this is the primary driver of the issue in the local areas that exceed 15%. If this guidance was updated and required planning permission then a far more effective.	The figure of 15% as included in the SPG is therefore considered to be fully justified and reasonably. <u>RECOMMENDATION</u> – No change
13.	Support	Cyfoeth Naturiol Cymru	6.2.1	We welcome the amendment of paragraph 6.2.1 of the Tourism Accommodation and Facilities SPG to include the consideration of cumulative landscape impacts.	<u>RECOMMENDATION</u> – Accept the supporting comment.
14.	Support	Cyngor Cymuned Llanengan	6.21	Support the change.	<u>RECOMMENDATION</u> – Accept the supporting comment.
15.	Objection	Cadnant Planning Ltd.	6.2.1	Clarification is required here on the scale or number of additional units which may trigger a requirement for cumulative assessment of impact on services or transport, The requirement should only relate to development of 10 or more units of accommodation.	It is difficult to be prescriptive in terms of the thresholds where cumulative impact needs to be taken into account. Each case should be considered on its own merit. Matters such as form, location and sensitivity of the landscape can all be factors when considering the cumulative impact of development. <u>RECOMMENDATION</u> – No change

Page 23

The consultation held on the CCA specifically concerned the amendments to section 4.6 and paragraph 6.2.1 of the SPG. The sections which were the subject of the amendment were shown in bold writing and underlined. The following comments were received in relation to other parts of the Guidance which were not subject of the formal consultation period. Therefore, no further consideration has been given to the representations and it is not proposed to amend the Guidance in response to these comments:-

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
Objection	Dafydd Roberts	General	The principle of overprovision is expressed in 4.6.1 with respect to self-catering holiday accommodation.	Not a valid comment. The comment does not specifically relate to a part of

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
			<p>There has been a huge increase in the number of "shepherd huts" recently. It would also be prudent to consider an overprovision test for touring caravan parks, camping and temporary alternative camping accommodation, to commit to sustainability principles and to reduce the risk of congestion and overcrowding at the island's main visitor attractions, as seen in summer 2020.</p> <p>Facing a "gridlock" when trying to visit our beaches is likely to deter visitors from re-visiting.</p> <p>There are several references to "the local area" in the report. Where is the definition of "local area", and if visitors have cars - unless the whole island is a "local area".</p>	<p>the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>
<p>Objection</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 24</p>	<p>Bourne Leisure</p>	<p>1.1.7</p>	<p>The Status of Supplementary Planning Guidance</p> <p>Draft paragraph 1.1.7 states:-</p> <p>“This document should, therefore, be given substantial weight as a material planning consideration”</p> <p>Chapter 9 of the Development Plans Manual (edition 3) (DPM) states:-</p> <p>“Only the policies in the adopted development plan have special status under section 38(6) of the PCPA 2004 in deciding planning applications. However, Supplementary Planning Guidance (SPG) can be taken into account as a material consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight.”</p> <p>Whilst it is recognised that limited weight can only be given to SPG’s that have not followed the steps set out in the DPM, it is not automatically the case that significant weight is given where these procedures have been followed.</p> <p>Reference to the 2015 (edition 2) DPM in the Councils’ Procedural Note for preparing SPG has now been superseded by the latest manual, which does not give significant or substantial weight. To ensure “consistency” with</p>	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
			<p>chapter 9, we suggest that the word “substantial” is removed from draft paragraph 1.1.7. This will ensure that the weight given to the SPG is for the decision-maker to decide when permitting planning applications, and not automatically substantial, reflecting national policy and guidance.</p> <p>Bourne Leisure suggests that draft paragraph 1.1.7. is reworded as follows (rewording underlined and in bold):</p> <p>“This document should, therefore, be given substantial material weight as a planning consideration”</p>	
Objection	Cadnant Planning Ltd.	3.1.3.	Not all rural businesses are agricultural. This should be amended to include rural diversification rather than solely agriculture.	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>
Objection	Cadnant Planning Ltd.	3.3.2	<p>Table 1 of the SPG in relation to ‘Maintaining and Creating Distinctive and Sustainable Communities’ considers retail and commercial development as those which maintain and improve the vitality and viability of settlements and that relates to policies MAN 1-MAN 6 of the JLDP. Tourism developments do not fall into those categories.</p> <p>Policy PS1 does not therefore require tourism developments to be subject to WLS or WLIA, only to comply with criteria 4 and 5 of the policy.</p>	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>
Objection	Cadnant Planning Ltd.	4.4.2	This should read “Location – As the plan promotes sustainable development, proposals involving development on poorly sited development will not be considered to align with the Policy’s approach. In line with national planning policy it is expected that new development will be located within or close to existing settlements which already have the infrastructure to service the development and/or which are accessible via sustainable means of transport.”	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
Objection	Cadnant Planning Ltd.	4.6.8 (Business Plan)	<p>Business owners by their very nature have the expertise to prepare business plans and this needs to be reflected in the SPG. A business plan should not be considered inadequate purely on the basis of who has prepared that document. Architects are not commonly known for preparing business plans for example.</p> <p>If business plans prepared by a business person is acceptable by banks and lenders, the LPA should not be so prescriptive.</p> <p>It is considered to be more appropriate to suggest that support could be sought by a professional. If the LPA consider the business plan to be inadequate, then it would be reasonable to request for an adequate business plan to be submitted.</p>	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>
Objection Page 26	Cadnant Planning Ltd.	5.5.1 (Definition of a chalet)	<p>This should reflect the definition provided in the adopted JLDP.</p>	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>
Objection	Cadnant Planning Ltd.	6.6.1	<p>“Where possible, measures should be taken to restore the site to its original state when not in use / during the closed season.”</p> <p>This is considered to be an excessive requirement and should be removed. It is unsustainable to remove hard or even permeable stone surfaces during the closed season. More damage would be made to sites and the landscape generally, through the use of heavy machinery and plant required to replace stone-based touring pitches or tracks. Some sites only have “closed season of 4-6 weeks – it would be wholly impracticable to restore sites to their original state for these limited periods.</p>	<p>Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period.</p> <p><u>RECOMMENDATION</u> – No change</p>

APPENDIX 2 - SUMMARY OF COMMENTS RECEIVED AND OFFICERS' RECOMMENDATIONS (DECEMBER 2018 TO JANUARY 2019)

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
1	Objection	Natural Resources Wales	4.8	We do not wish to see existing hotels located in zone C converted to permanent residential use unless a Flood Consequences Assessment (FCA) is submitted as part of any application.	<p>Not Relevant This section of the SPG deals with the main principle of the loss of hotels and therefore does not provide advice on the suitability of alternative uses. The need for an FCA is covered by Policy PS 6 and National Planning Policy Guidance.</p> <p>Recommendation No changes required to the SPG in light of this comment</p>
Page 27 2	Objection	Bourne Leisure Ltd c/o Lichfields	4.6.2	<p>The criteria to be introduced in paragraph 4.6.2 is for the purpose of controlling self-catering units within communities/settlements. Bourne Leisure has no objection to this in principle but the Company is keen to ensure that the criteria would not have unintentional consequences by also being applied to purpose built holiday resorts such as those operated by Bourne Leisure should, in future, it wish to introduce fixed base self-catering accommodation within its established parks.</p> <p>We therefore request that it is made explicit in the new wording that the criteria does not apply to existing holiday parks or complexes where the sole purpose of the park is to provide holiday accommodation and associated facilities. To achieve this, we suggest that the first sentence of 4.6.2 is amended as follows:</p> <p><i>“Criteria which help define overconcentration of holiday accommodation <u>within defined settlements</u> include....”</i></p> <p>A suitable paragraph could also be provided to explain the approach sought. This would make it</p>	<p>Not Accepted Overconcentration of holiday accommodation can be issue both within settlement boundaries and in the open countryside. With reference to the provision of new self- catering units, criterion v of Policy TWR 2 does not differentiate between land within settlements and land outside settlements and therefore it would be inappropriate for the guidance to do so. Each application will be dealt with on its own merit.</p> <p>Recommendation No changes required to the SPG in light of this comment</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				clear that the criteria would not apply to holiday parks such as Hafan y Môr and Greenacres that lie outside the defined settlement boundary.	
3	Support	Llanengan Community Council	4.6.2 & 4.8	We support what is noted in the Proposed Changes, especially 4.6.2 which comes at the forefront of a recent planning decision in the community. Unfortunately the proposed change 4.8 comes too late for us to oppose another planning application.	Comment noted.
Page 28	Objection	Cadnant Planning	4.6.2	<p>The fourth point <i>“Lack of community facilities and services as local businesses cater for the needs of visitors more than the needs of local residents.”</i></p> <p>This should not be a measure of whether it is acceptable to create a self-catering unit as many units make use of conversions etc. Therefore, little weight should be put on this point in trying to determine over-concentration of units.</p>	<p>Not Accepted</p> <p>The proposed criteria in section 4.6.2 lists a set of indicators which aims to highlight factors that are considered relevant in order to define overconcentration of holiday accommodation. The closure of community facilities or the changing nature of a shop that traditionally sold convenience goods to the local population such as bread and milk to a shop that mainly sells items for tourists such as souvenirs could reflect the changing nature of the community.</p> <p>Recommendation</p> <p>No changes required to the SPG in light of this comment</p>
5	Objection	Llanystumdwy Community Council	4.6.2	<p>As no planning permission is needed to change a home to a holiday or second home it is currently impossible to control the numbers of self-catering holiday accommodation/beds that currently exist within communities and in the open countryside. Some areas have high numbers of self-catering holiday homes which has led to the loss of village community and resulted in changing the character of rural areas.</p> <p>The Planning Service should not take the word of agencies and lettings companies into account when supporting business plans that are submitted as part</p>	<p>Not Accepted</p> <p>The proposed criteria in section 4.6.2 lists a set of indicators which aims to highlight factors that are considered relevant in order to define overconcentration of holiday accommodation. An assessment of information about these indicators will help the decision maker determine whether a proposal for new build or change of use to holiday accommodation triggers criterion v in Policy TWR 2, i.e. that there is overconcentration in the area.</p> <p>Business plans are useful tools to demonstrate the robustness (or not) of any proposed holiday accommodation development which enables the</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation	
Page 29				<p>of a planning application. Permitting these applications is of interest to these companies.</p> <p>When a holiday accommodation business fails the owners can submit a change of use planning application to be allowed to change from self-catering accommodation to permanent dwelling. This proves that there is no need for more.</p> <p>Consideration must be given to the number of Air BnB properties.</p>	<p>Councils to assess whether the scheme has a realistic chance of being viable.</p> <p>Section 4.7 of the emerging SPG highlights the cascading conditions that will happen if it can be demonstrated that the holiday unit is no longer viable The following uses will be considered:</p> <ul style="list-style-type: none"> a) a suitable alternative employment use, or occupied by a person solely or mainly working on a rural enterprise in the locality; where there is/was a defined functional need; or if it can be demonstrated that there is no eligible alternative employment use, to those: b) who would be eligible for consideration for affordable housing under the local authority's housing policies; or if it can be demonstrated that there are no persons eligible for occupation under (a); c) widows, widowers or civil partners of the above and any resident dependants. <p>The Local Planning Authority has no control over the use of existing homes as holiday accommodation (Air BNB) as they do not usually need planning permission for change of use as they are the same use class, i.e. Class C3. The number of homes advertised as Air BnB can vary on a daily basis</p> <p>Recommendation No changes required to the SPG in light of this comment</p>	
	6	Support	Llanystumdwy Community Council	4.8	Agree with the proposal in the document on the change of use of existing hotels.	Comment noted
	7		Angela Gliddon	4.6.2	This document gives points to consider to decide what "overconcentration" of holiday	Not Accepted

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
Page 30				<p>accommodation is. I feel that some guidance on the proportion of such properties should be given. Perhaps a maximum of in seaside villages and in towns and rural villages.</p> <p>I am particularly concerned that the planning dept has no control over the purchase of second homes by outsiders and in my experience second homes frequently become holiday lets.</p> <p>Does the Planning Committee have to give permission for the change of use to holiday lets? Is it aware of the extent of these changes?</p>	<p>The number of properties used as holiday accommodation varies greatly between settlements. In addition, the character of settlements varies. Therefore it is not possible to provide guidance on the proportion of holiday accommodation considered appropriate per settlement. In any case, criteria iii & iv precludes the use of existing houses and the provision of such a facility within a primarily residential area. The proposed criteria in section 4.6.2 lists indicators which aim to define overconcentration of holiday accommodation.</p> <p>Planning Officers or Planning Committee have no control over second home ownership because people do not need planning permission to own a second home. The Planning Officers or Planning Committee have no control over the use of existing homes as holiday accommodation (Air BnB) as they do not usually need planning permission for change of use as they are the same use class.</p> <p>Planning Officers or Planning Committee do not have to give permission for the holiday accommodation but in refusing the application must state on what grounds the application is being refused. The criteria in 4.6.2 which aims to define overconcentration will help the Planning Officer or Planning Committee to make its decision.</p> <p>All proposed developments for holiday accommodation should conform to policy TWR2 of the Joint Local Development Plan. The Local Planning Authority and Planning Committee can refuse applications that do not conform, unless there are material considerations that outweigh the conflict with the adopted policy.</p>

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					<p>Recommendation No changes required to the SPG in light of this comment.</p>
8		Angela Gliddon	4.8	I understand the wishes of planners to retain the existence of hotels but feel these suggestions are rather draconian. They are likely to lead to low morale among hotel proprietors and allow their hotels to become run down on purpose. This would be the opposite result to what is wanted.	<p>Not Accepted Comments noted however the Local Planning Authority has no control over the intent of hoteliers.</p> <p>Recommendation No changes required to the SPG in light of this comment.</p>

**SUPPLEMENTARY PLANNING
GUIDANCE**

CONSULTATION DRAFT

**TOURISM FACILITIES
AND
ACCOMMODATION**



MARCH 2021

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN

Contents

1.0	Introduction and Purpose of the Supplementary Planning Guidance	4
1.1	Purpose	4
1.2	Introduction.....	5
2.0	Planning Policy Context	6
2.1	Future Wales: The National Plan 2040	6
2.2	National Planning Policy	6
2.3	Joint Local Development Plan.....	6
3.0	Tourism – Overarching Planning Considerations	8
3.1	High Quality Development	8
3.2	Landscape/Environmental Considerations	9
3.3	Welsh Language Considerations	11
4.0	Permanent Serviced and Self-Serviced Holiday Accommodation	12
4.1	Type of units.....	12
4.2	Scale of development.....	12
4.3	Converting existing buildings	13
4.4	Suitable previously developed land	14
4.5	Extensions to existing permanent holiday accommodation development business	15
4.7	Applications to delete the Occupancy Condition.....	18
4.8	Change of Use of Existing Hotels	18
5.0	Static Caravan, Chalets and Permanent Alternative Camping Accommodation	20
5.1	Type of Units	20
5.2	Standalone developments.....	20
5.3	Significant intensification	20
5.4	Coastal Change Management Areas	21
5.5	Using static caravans and chalets for residential purposes.....	22
6.0	Touring Caravan, Camping and Temporary Alternative Camping Accommodation	24
6.1	Type of Units	24
6.2	Landscape considerations	24
6.3	Highway considerations	25
6.4	Periods of Operation	25
6.5	Ancillary facilities	26
6.6	Excessive use of hard standings and man-made features	26
7.0	Occupancy Conditions	27
8.0	Visitor Attractions and Facilities	28
8.1	Location of Development	28
9.0	Further Information & Contacts	29
	Appendix 1 – Relevant JLDP Policies.....	30
	STRATEGIC POLICY PS 1: WELSH LANGUAGE AND CULTURE	30
	STRATEGIC POLICY PS 5: SUSTAINABLE DEVELOPMENT.....	30

POLICY PCYFF 2: DEVELOPMENT CRITERIA	31
POLICY PCYFF 3: DESIGN AND PLACE SHAPING	32
POLICY PCYFF 4: DESIGN AND LANDSCAPING	32
POLICY ARNA 1: COASTAL CHANGE MANAGEMENT AREA	33
POLICY TWR 1: VISITOR ATTRACTIONS AND FACILITIES	35
POLICY TWR 2: HOLIDAY ACCOMMODATION	35
POLICY TWR 3: STATIC CARAVAN AND CHALET SITES AND PERMANENT ALTERNATIVE CAMPING ACCOMMODATION	36
POLICY TWR 4: HOLIDAY OCCUPANCY	37
POLICY TAI 14: RESIDENTIAL USE OF CARAVANS.....	38
POLICY TWR 5: TOURING CARAVAN, CAMPING AND TEMPORARY ALTERNATIVE CAMPING ACCOMMODATION	39
Appendix 2 – LANDMAP Collector File Example (paragraph 3.6.2).....	40
Appendix 3 – Sensitivity and Capacity Maps (paragraph 5.3.3)	42
Appendix 4 - Business Plan Template (paragraph 4.6.8)	51
Appendix 5 – Coastal Change Management Areas (section 5.4).....	54

FINAL DRAFT

1.0 Introduction and Purpose of the Supplementary Planning Guidance

1.1 Purpose

1.1.1 The Purpose of this Guidance is to:

- assist the public and their agents in preparing planning applications and in guiding them in discussions with officers before submitting planning applications,
- assist officers to assess planning applications, and officers and councillors to make decisions about planning applications, and
- help Planning Inspectors make decisions on appeals.

1.1.2 The general aim is to improve the quality of new developments and facilitate a consistent and transparent way of making decisions.

The Policy Context

Local Development Plan

1.1.3 Under planning legislation, the planning policies for every area are contained within the 'development plan'. The Gwynedd and Anglesey Joint Local Development Plan was adopted on 31 July 2017. It relates to the Gwynedd and Anglesey Planning Authority area.

1.1.4 The Plan provides wide-ranging policies along with allocations for the main land uses, such as housing, employment and retail; it will help shape the future of the Plan area physically and environmentally, and will also influence it economically, socially and culturally. The Plan, therefore, attempts to:

- guide the Local Planning Authorities to make rational and consistent decisions on planning applications by providing a policy framework that is consistent with national policy; and
- guide developments to suitable areas during the period up to 2026.

The need for Supplementary Planning Guidance

1.1.5 Although the Plan contains policies that enable the Local Planning Authority to make consistent and transparent decisions on development applications, it cannot provide all the detailed advice required by officers and prospective applicants to steer proposals locally. In order to provide this detailed advice, the Councils are preparing a range of Supplementary Planning Guidances to support the Plan that will provide more detailed guidances on a variety of topics and matters to help interpret and implement the Plan's policies and proposals.

The Status of Supplementary Planning Guidance

1.1.6 Supplementary Planning Guidance (SPG) may be considered to be material planning considerations during the process of assessing and determining planning applications. Welsh Government and the Planning Inspectorate will place considerable weight on supplementary planning guidance that stem from, and are consistent with, a development plan. The SPGs do not introduce any new planning policies.

1.1.7 In accordance with Welsh Government advice, the SPG has been the subject of a public consultation and a resolution to adopt by the Joint Planning Policy Committee on behalf of the Councils. A draft version of this SPG was approved for public

consultation on *date* by *Committee name*. The supplementary planning guidance was the subject of a public consultation exercise between *date*. The x observations presented to the Councils were considered and, where appropriate, appropriate changes have been included in the final draft approved by the *Joint Planning Policy Committee* on *date* to be used as a material consideration when assessing and determining planning applications and appeals. A summary of the observations and the Councils' response are given in *Appendix or location of a Committee report*.

This document should, therefore, be given substantial weight as a material planning consideration.

1.2 Introduction

- 1.2.1 This SPG covers all forms and scales of holiday accommodation and tourism attractions. Tourism is a dynamic sector and is subject to continuous change. It plays a significant role in the plan area's economy. The visitor economy provides jobs, services and facilities that are essential to the well-being and enjoyment of local communities and residents in the plan area. The importance of tourism can be seen in the table¹ below:

2019	Gwynedd*	Anglesey
Total economic impact of tourism	£1.35 billion	£362.25 million
Total visitor numbers (millions)	7.81	1.79
Number of staying visitors (millions)	3.97	1.08
Number of day visitors (millions)	3.84	0.71
Number of FTE ² jobs supported by tourism spend	18,244	4,328

*includes Snowdonia National Park

- 1.2.2 Both Anglesey and Gwynedd benefit from extensive natural and cultural assets that offer considerable potential for residents and visitors to enjoy. However new tourism developments can have a negative impact upon the local environment and communities if they are insensitively developed or inappropriately located.
- 1.2.2 Both Gwynedd Council and the Isle of Anglesey County Council are committed to the principles of sustainability and the Joint Local Development Plan has sustainable development at its core and recognises that all development in the plan area should embody these principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of the plan area. See policy PS 5 Sustainable Development in Appendix 1.

¹ STEAM Report 2017

² FTE = Full Time Employment

2.0 Planning Policy Context

2.1 Future Wales: The National Plan 2040

- 2.1.1 'Future Wales: The National Plan 2040' recognises the importance of the tourism sector to the rural economy. A sustainable tourism sector is promoted along with the need to promote opportunities for active, green and cultural tourism. Policy 21 which specifically relates to the Regional Growth Area - North Wales Coastal Settlements identifies the need for Local Development Plans together with Strategic Development Plans to recognise the importance of the tourism sector to the area.

2.2 National Planning Policy

- 2.2.1 National planning policy guidance on tourism is set out in Planning Policy Wales (PPW, Edition 11, Feb 2021) and recognises that it involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales and that tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection (5.5.1).
- 2.2.2 It recognises that in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. New tourism developments should be sympathetic in nature and scale to the local environment (5.5.3). It also recognises that there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors (5.5.2).
- 2.2.3 Further guidance is also contained in the Technical Advice Notes (TAN) TAN13: Tourism (1997) which provides advice on hotel development, static and touring caravans and seasonal occupancy conditions. TAN6: Planning for Sustainable Communities (2010) contains advice such as the location of development and the conversion of buildings for holiday use.

2.3 Joint Local Development Plan

- 2.3.1 The Anglesey and Gwynedd Joint Local Development Plan (JLDP) was adopted on the 31st July 2017 and provides the planning policy framework for this SPG. The important role of tourism in the plan area is reflected in the JLDP which seeks to support and enable sustainable tourism development while at the same time ensuring that the natural and built environment are preserved and enhanced.
- 2.3.2 The overarching strategic policy for tourism in the JLDP is policy PS14: The Visitor Economy as set out below:

STRATEGIC POLICY PS14: THE VISITOR ECONOMY

Whilst ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment the Councils will support the development of a year-round local tourism industry by:

1. Focusing larger scale, active and sustainable tourism, cultural, the arts and leisure development in the sub-regional centre, urban service centres, and, where appropriate, local service centres;
2. Protecting and enhancing existing serviced accommodation and supporting the provision of new high quality serviced accommodation in the sub-regional, urban and local service centres and villages;

3. Managing and enhancing the provision of high quality un-serviced tourism accommodation in the form of self-catering cottages and apartments, camping, alternative luxury camping, static or touring caravan or chalet parks;
4. Supporting appropriately scaled new tourist provision and initiatives in sustainable locations in the countryside through the reuse of existing buildings, where appropriate, or as part of farm diversification, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives;
5. Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation and areas of visitor interest or their setting, and maximise opportunities to restore previous landscape damage.

2.3.3 This SPG contains the following information:

- Section 3 – Overarching Planning Considerations
- Section 4 – Permanent Serviced and Self-Serviced Accommodation
- Section 5 – Static Caravan, Chalet and Permanent Alternative Camping Accommodation Sites
- Section 6 – Touring Caravans, Camping and Temporary Alternative Camping Accommodation Sites
- Section 7 – Holiday Occupancy
- Section 8 – Visitor Attractions and Facilities

3.0 Tourism – Overarching Planning Considerations

There are a number of considerations that are relevant to the majority of proposals for new or extensions to tourism facilities and holiday accommodation which are set out below. Other considerations may, however, be relevant to the different types of proposals being put forward. These issues will be considered in later sections of this SPG.

3.1 High Quality Development

(Policy TWR 1 criterion ii; Policy TWR 2; Policy TWR 3 criterion 1; Policy TWR 5 criterion 1)

3.1.1 This refers to the quality of the development in terms of land-use considerations and not to any recognised grading scheme operated by the tourism industry. In addition to local policy requirements, national policy guidance states that development in rural areas should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas (TAN13: Transport, para 3.11).

3.1.2 All proposed tourism developments should be high quality in terms of design, layout and appearance. A primary consideration will be the overall quality of the ‘scheme’, measured against the requirements of the plan’s development management policies (see Appendix 1):

- Policy PCYFF2: Development Criteria, which states that development proposals should not have an adverse impact on the health, safety or amenity of the local community due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance.
- Policy PCYFF3: Design and Place Shaping, which states that all proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environment context and contributes to the creation of attractive, sustainable places, and,
- Policy PCYFF4: Design and Landscaping, which states that all proposals should integrate into their surroundings. Proposals that fail to show (in the manner appropriate to the nature, scale and location of the proposed development) how landscaping had been considered from the outset as part of the design proposal will be refused.

3.1.3 Central to deciding the land use effects of applications are the criteria which help to define a high quality development. No policy document can be prescriptive, or exhaustive, in describing the opportunities that may arise. In terms of the planning of high quality development the issues will normally relate to the type of factors identified below. (Please note this is not an exhaustive list and each application will be assessed on its merit).

Criteria which help define high quality development in terms of land use considerations include:

- Sites located in a sustainable location i.e. within or close to existing settlements where new development can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation and sites not normally lying in open countryside unless there is robust justification for this;

- Sites that are close to the main highway network and have good links to various modes of transport;
- Sites that are not visually intrusive on the landscape, are well screened and do not cause adverse harm to protected landscapes (e.g. the AONB and SLAs) or heritage assets (e.g. World Heritage Sites and Scheduled Ancient Monuments);
- Sites that are not located within zone C of the development advice maps (TAN15);
- Sites that are of a suitable scale to fit in with their surroundings;
- Sites that have existing landscape cover and no major visual impact;
- Protecting the undeveloped coast;
- Protecting and promoting biodiversity interest;
- Respect for the historic and natural environment;
- Helps reinforce and strengthen an existing tourism centre and makes better use of land by consolidating areas of existing tourism activity (tourist attractions, marina etc.);
- Enhancing suitable previously developed (brown field) land;
- Part of a scheme for agricultural diversification and supporting the rural economy.

3.2 Landscape/Environmental Considerations

(Policy TWR 3 criterion 1; Policy TWR 5 criterion 1)

3.2.1 Landscape character, natural and built conservation features, setting, the availability of views, site layout and screening are important considerations in assessing tourism proposals. The JLDP policies state that new developments should be located in an unobtrusive location. An unobtrusive location is defined in the plan as one which is well screened by existing landscape features and/or where units can be readily assimilated into the landscape without the need for excessive man made features.

3.2.2 Policy PCYFF4: Design and Landscaping states that all proposals should integrate into their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused. The policy gives guidance on the contents of a landscape scheme, and should, where relevant:

1. Demonstrate how the proposed development has given due consideration to the Landscape Character Area Assessment or Seascape Character Area Assessment;
2. Demonstrate how the proposed development respects the natural contours of the landscape;
3. Demonstrate how the proposed development respects and protects local and strategic views;
4. Respect, retain and complement any existing positive natural features, landscapes, or other features on site;
5. Identify trees, hedgerows, water courses and topographical features to be retained;
6. Provide justification for circumstances where the removal/loss of existing trees, hedgerows, water courses and topographical features cannot be avoided and provides details of replacements;
7. Provide details of any proposed new landscaping together with a phased programme of planting;

8. Demonstrate that any proposed new planting includes plants and trees of mainly native species of local provenance and does not include any non-native invasive species;
 9. Ensure that selection of species and planting position of any trees allows for them to grow to their mature height without detriment to nearby buildings, services and other planting; and
 10. Provide permeable hard surface landscaping.
- 3.2.3 Where appropriate, landscape visual impact assessment, and photomontages from viewpoints agreed with the LPA to demonstrate potential visual impacts of a proposed development should be provided along with mitigation measures to address the identified impacts.
- 3.2.4 A landscaping scheme by a suitably qualified person should be submitted with the application. Conditions will be used to ensure that the agreed landscaping scheme is implemented before the development becomes operational and is maintained in perpetuity.
- 3.2.5 There will be unsuitable sites in an open countryside location i.e. where there are no existing natural screening or when the development is in a prominent location, where no amount of landscaping will mitigate any impacts.
- 3.2.6 Applicants will be expected to demonstrate how they have considered the information provided by the Gwynedd Landscape Strategy³, Anglesey Landscape Strategy⁴, Landscape Sensitivity and Capacity Study⁵ and the LANDMAP resource⁶. LANDMAP is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated. It contains detailed surveys for individual areas called Collector Files. An example of a collector file can be found in Appendix 2.
- 3.2.7 Within the AONBs and SLAs all developments must have regard for the AONB and SLA special qualities. Applications that have a significant impact on these special qualities will be refused.

Further information regarding the special qualities can be found:

- Isle of Anglesey AONB Management Plan (2015 – 2020): <https://www.anglesey.gov.uk/documents/Docs-en/Countryside/Anglesey-AONB-Management-Plan-2015---2020.pdf>
- Llyn AONB Management Plan: <https://www.ahne-llyn-aonb.org/7/en-GB/Managing-the-AONB>
- Review of Special Landscape Areas in Gwynedd and Anglesey (2012): <https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies->

³ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Landscape-Sensitivity-and-Capacity-Assessment-\(DC.020\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Landscape-Sensitivity-and-Capacity-Assessment-(DC.020).pdf)

⁴ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Angesey-Landscape-Strategy---Update-2011-\(DC.011\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Angesey-Landscape-Strategy---Update-2011-(DC.011).pdf)

⁵ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Gwynedd-Landscape-Strategy-Update-2012-\(DC.010\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Gwynedd-Landscape-Strategy-Update-2012-(DC.010).pdf)

⁶ <https://landmap-maps.naturalresources.wales/>

[and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Review-of-SLAs-in-Gwynedd-and-Anglesey-\(DC.008\).pdf](#)

3.3 Welsh Language Considerations

(Policy PS 1; Policy PS 5 criterion 4)

- 3.3.1 The Welsh language plays an important role in the social, cultural and economic life of the Plan area's residents and visitors. Where development is proposed, consideration must be given to the enhancement and protection of the language and culture. Strategic Policy PS1 sets out the context for the assessment of the potential impact of proposals upon the language and culture (see Appendix 1).
- 3.3.2 In terms of tourism development the larger proposals that involve employing more than 50 people and/or with an area of 1,000sq metres will require a Welsh Language Statement, which will protect, promote and enhance the Welsh language. All proposals, irrespective of type, size or location, will be expected to comply with criterion 4 and 5 of PS1 which is the requirement of a bilingual signage scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies. It is expected that existing Welsh names are retained and appropriate Welsh names are used for new developments.
- 3.3.3 Criteria 3 of PS1 states that the Councils will refuse proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms.
- 3.3.4 Further information on the above can be found in the "Maintenance and creation of distinctive and sustainable communities" SPG (www.gwynedd.llyw.cymru/spg / www.anglesey.gov.uk/spg).

4.0 Permanent Serviced and Self-Serviced Holiday Accommodation

Policy TWR 2: Holiday Accommodation (see Appendix 1) provides the primary policy framework for the provision of new or the extension of existing permanent serviced and self-serviced holiday accommodation facilities. The main policy considerations are as follows:

- Type of Units
- Scale of development
- Converting existing buildings
- Suitable previously developed land
- Extensions to existing permanent holiday accommodation development
- Over-concentration of permanent self-catering holiday accommodation
- Planning Conditions

4.1 Type of units

- 4.1.1 The type of units considered under this policy are permanent buildings that are constructed on site over a period of time, unable to be dismantled and rebuilt elsewhere.

4.2 Scale of development

- 4.2.1 Criteria ii. of TWR 2 states that all proposed developments should be appropriate in scale having regard to the site, location and/or settlement in question. To ensure that this is achieved, the applicant will be expected to demonstrate that the proposal fully takes into account the character of both site and its surrounds and the site's existing or potential relationships with any important focal points, views, historic buildings etc. This assessment should be proportionate to the scale and context of the proposals. In line with national planning policy it is expected that large scale new developments will be located within to existing settlements or on suitable previously developed land, which already have the infrastructure to service the development, and protect the open countryside from inappropriate development. Factors that will be taken into account when assessing the scale of a proposal include:

1. That the site is of sufficient size to accommodate the proposal without prejudicing any appropriate provision of ancillary facilities such as soft landscaping and parking and service areas. (See policy PCYFF 4, Appendix 1).
2. That the scale of the development is compatible with, and fits comfortably into its surrounding (See policy PCYFF 3, Appendix 1).
3. In accord with the principles of promoting sustainable development it is important that new developments (including those on previously developed sites), which could substantially increase the number of journeys made by private vehicles, should be located within or as close as possible to, or within reasonable walking distance of the service centres identified in the Plan's settlement hierarchy, and/or within reasonable safe walking distance to public transport interchanges or routes, where feasible. In assessing the transport aspects of a proposal the LPA will balance the functional need for the proposal's location and its benefits to the local economy with the need to promote the most sustainable modes of transport.
4. That the scale of the development does not adversely impact on the cultural character of the local community but is proportionate to the size and character of existing buildings/business and any settlement it is located within or nearby.

4.3 Converting existing buildings

- 4.3.1 When assessing planning applications for the re-use or adaption of a building to either serviced or self-serviced holiday accommodation facilities, the primary consideration will be whether the nature and extent of the new use proposed for the building is acceptable in planning terms. Further information can be found in the “Conversion of Buildings in the Open Countryside SPG” (www.gwynedd.llyw.cymru/cca / www.anglesey.gov.uk/spg).
- 4.3.2 The following is a list of issues that will be considered in order to assess the building’s suitability to be used specifically as holiday accommodation:
- i. The building is structurally sound and capable of conversion without major or complete reconstruction, large extensions or major alterations;
 - ii. The building is suitable for the specific use;
 - iii. Any inherent characteristics of merit in the building are retained and any features of historical or architectural importance are safeguarded;
 - iv. The conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest;
 - v. Protecting biodiversity interests such as bats;
 - vi. The conversion respects the character, scale and setting of the existing building;
 - vii. Their form, bulk and general design are in keeping with their surroundings;
 - viii. The conversion does not lead to dispersal of activity on such scale as to prejudice town and village vitality;
 - ix. The need for new services to the property;
 - x. Whilst it should not normally be necessary to consider whether a building is no longer needed for its present purposes, it will be appropriate to investigate (a) the history of the building to establish whether it was ever used for the purpose for which it was claimed to have been built, and/or (b) the impact of its loss on any adjoining/nearby properties (e.g. loss of any curtilage buildings);
 - xi. The proposed use’s compatibility with existing adjoining/ nearby property’s use in terms of noise, traffic disturbance, lack of privacy for any adjoining property/ nearby property;
 - xii. The existing building’s effect on the landscape in terms of visual amenity and whether the proposal would secure an improvement in the external appearance of the building.
 - xiii. The proposal would not harm the amenities of neighbouring properties
- 4.3.3 Any application to convert an existing building must be accompanied by a full structural survey by a qualified person which demonstrates that the building is structurally capable of conversion without extensive rebuilding, alterations and extensions. The structural survey must relate to the proposed plans i.e. that the building can take the works proposed, and should include trial pits so that fundamental issues are known e.g. what foundations exist, is underpinning required etc.
- 4.3.4 Further guidance can be found in national planning policy guidance. Paragraph 3.2.1 of TAN 23: Economic Development⁷ states that the re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, **and tourism**, sport and recreation. In recognising this, local planning authorities are expected to adopt a positive approach to the conversion

⁷ <http://gov.wales/topics/planning/policy/tans/tan-23/?lang=en>

of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes.

4.4 Suitable previously developed land

4.4.1 In the case of proposals for new visitor attractions and serviced and self-serviced holiday accommodation, all development proposals will have to be either located within a development boundary or on **suitable** previously developed land. The JLDP uses the definition of previously developed land found in Planning Policy Wales (11th Edition, Feb 2021 which states:

Previously developed (also known as brownfield) land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures.

Excluded from the definition are:

- land and buildings currently in use for agricultural or forestry purposes;
- land which has not been developed previously, for example parks, recreation grounds, golf courses and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings;
- land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings;
- land which is species rich and biodiverse and may qualify as section 7 habitat' or be identified as having nature conservation value; fn Environment Act; and
- previously developed land subsequently put to an amenity use.

Notes:

1. The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas.
2. This relates to minerals and waste sites which would otherwise remain unrestored after use because the planning permission allowing them did not include a restoration condition. All other such sites will be restored to greenfield status, by virtue of the planning condition. It should be recognised, however, that non-hazardous landfills may not be able to accommodate built development without significant investment and long-term monitoring.
3. Nature conservation value may be identified through Green Infrastructure assessments (see Chapter 6).

4.4.2 Once established that the development is located on previously developed land (as defined in the box above) an assessment of its suitability must be undertaken. Factors that define the suitability of the previously developed land include:

- Location – As the plan promotes sustainable development, proposals involving development on poorly sited development will not be considered to align with the

Policy's approach. In line with national planning policy it is expected that new development will be located within or close to existing settlements which already have the infrastructure to service the development and which are accessible via sustainable means of transport.

- Nature of the previously developed land – Urban development (nature of and appearance) in the open countryside can often be considered as alien to its natural surroundings therefore careful consideration should be given to the visual/landscape impact of such development, i.e. new buildings located above a ridgeline or which occupy a top of slope/ridge location or would otherwise be a prominent feature in the landscape will be unacceptable. It should be ensured that any proposed development will not have a tangible greater impact on the character and openness of the surrounding area in comparison to that of the previously developed land.

4.4.3 All applications for demolition and rebuilding of an existing building must be accompanied by a structural survey in order to assess the structural condition of the existing building to ascertain whether it is capable of conversion or not. It is not the policy's intention to allow for the demolition of an existing structurally sound building in order to engineer new brownfield land.

4.5 Extensions to existing permanent holiday accommodation development business

4.5.1 Any application for extensions to existing permanent holiday accommodation developments must prove that there is an established link between the proposed and current development i.e. will form part of the same planning unit, must be part the same business and the application to extend the holiday accommodation business is part of a wider scheme to improve the business and tourist offer in the Plan area.

4.5.2 The scale and design of the proposed development should be commensurate with the existing business.

4.6 Defining over-provision

4.6.1 A high number of holiday accommodation or a concentration of holiday accommodation in a specific area can have a detrimental impact on the social fabric of those communities. Policy TWR 2 (criterion 5) clearly states that no holiday accommodation provision should lead to an 'excess' holiday accommodation in a specific area.

Defining the types of units that need to be considered

4.6.2 In considering an over-provision of self-catering holiday accommodation, consideration should be given to the provision and range of permanent self-catering holiday accommodation available. Examples of this type of accommodation include self-catering holiday accommodation (including Airbnb) along with dedicated holiday accommodation (i.e. permanent units that have been granted planning permission for the purpose of holiday use). Furthermore, consideration should be given to the rate of second homes within a community. Matters associated with the impact of second homes on communities often correspond to matters associated with 'self-catering holiday accommodation', for example high levels of second homes, along with holiday accommodation, can mean:

- A lack of housing supply in order to meet the local need;
- Impact on local services, the amenities of local residents and the community;
- A lack a permanent population in order to maintain and support local community facilities;
- Seasonal employment opportunities only;
- Impact on local house prices.

Area

- 4.6.3 The provision of holiday accommodation should be considered within the area/settlement where the proposal is located, along with the wider area. Council Tax figures in terms of second homes and non-domestic holiday accommodation (business rate) are based on Community/Town/City Council area. In some cases, especially rural areas which border with a neighbouring community/town/city council, or are clearly influenced by it, it will be appropriate to give consideration to the level of provision in that area as well. Further, there could be examples of cases where there is a high number of holiday accommodation in a particular settlement/area within a Community/Town/City Council area. In such exceptions the LPA may consider the local provision (i.e. beyond Town/City Community Council level) if it is considered appropriate and fair to do so.

Information sources

- 4.6.4 Council Tax information, along with any information deriving from the relevant Bed Stock Survey, should be used when attempting to gather information regarding the existing provision of holiday accommodation and second homes. Applicants are encouraged to contact the Joint Planning Policy Service to receive guidance in order to ensure that accurate and up to date information is used.

Defining over-provision

- 4.6.5 In assessing whether or not there is an over-provision of holiday accommodation, the following should be considered:
- Whether or not there is an even distribution of holiday accommodation across the area - A provision of holiday accommodation that has been distributed evenly across the area is a way of ensuring that it does not lead to pockets of empty properties during the winter and ensures that excess pressure is not applied on local services and infrastructure at the peak of the season;
 - Sociocultural impact – If holiday accommodation permeates into a traditionally residential area it can lead to a change in people's values and behaviour, and consequently, lead to them losing their cultural identity.
 - Impact on the amenities of local residents, e.g. complaints regarding noise, disturbance, increase in traffic etc.
 - Lack of community facilities and services - Local businesses providing for the needs of visitors more than the needs of local residents and only opening on a seasonal basis.

- Pressure on local infrastructure - The capability and capacity of local infrastructure to cope at the peak of the season.
- Quantity of holiday accommodation - Favourable consideration will not be given to applications for self-serviced holiday accommodation when the existing combination of holiday accommodation and second homes within the Community/Town/City Council area is higher than 15%. Council Tax information should be used as the information source in order to find this information. Exceptions may arise, where it is considered that there is a high level (more than 15%) of holiday accommodation in a particular settlement/area within a Community/Town/City Council. In such circumstances, consideration may need to be given to provision beyond the Community/Town/City Council level

4.6.6 It is recognised that some exceptional circumstances can arise where there are clear advantages to allowing holiday accommodation in an area that already has a high number of holiday accommodation and second homes (beyond the 15% threshold). These exceptional cases include:

- An enterprise associated with rural diversification. There would be a requirement to prove that the proposal is associated with an existing rural enterprise (in accordance with the definition included in Technical Advice Note 6: Planning for sustainable rural communities) and that the proposal contributes to sustaining that enterprise. Any such enterprise (the exception) should involve the conversion of a unoccupied traditional building(s) that are structurally sound, rather than new developments. Furthermore, the proposal should be legally bound to the existing rural enterprise.
- A proposal that would involve preserving and making alternative use of a listed building of historical value.

The business plan

4.6.7 The Business Plan is not expected to be a long and complex document, however detailed information supported by quantitative and qualitative information will be required (as applicable). Further, the level of detail/information expected to be included within the Business Plan needs to be commensurate with the proposal. Evidence which support any assumptions within the Business Plan should be included and annexed as appropriate within the Plan.

4.6.8 The Business Plan should be prepared by a qualified individual/company. For example, those undertaking the Business Plan could be an Architect, Professional Planner, Chartered Surveyor, Financial Advisor or an expert in the field of tourism (or a combination of these individuals) with the applicant's input in terms of the business' vision for the future. The 'Business Plan' should clearly state who has undertaken the Plan along with the individual's qualification in relation to undertaking the work.

4.6.9 All Business Plans will be assessed by the Planning Officer in consultation with competent officers within the Council. Further assistance may be required by external experts at the applicants' expense.

4.6.10 In order to give advice to applicants relating to what information should be included within the Business Plan a template has been included in appendix 4. Please note that the template is not definitive but it does give guidance on the type of information which is required. The template is an adaptation of guidance given by 'Business Wales' [<https://businesswales.gov.wales/zones/starting-up/business-plan>].

4.7 Applications to delete the Occupancy Condition

4.7.1 A planning condition will be placed on all applications that the property(ies) will be used for holiday accommodation purposes only. A number of these properties are located in the open countryside, away from the settlements identified in the JLDP, in areas where new residential development would not normally be permitted. If robust evidence is provided to demonstrate that the property is no longer viable as a holiday let, a sequential approach will be taken to manage the property's occupation, in line with national planning policy guidance. In the first instance, the applicant will need to demonstrate sound planning reasons that the property cannot be adapted for another employment use. Then, if it can be proven that no other employment uses can be found for the building then it could be suitable for workers who work on a rural enterprise locally and there are no existing dwellings available on the enterprise (subject to planning consent).

4.7.2 Finally, if the LPA is satisfied that there are no eligible rural enterprise workers seeking accommodation, the eligibility will be extended to local persons who would be eligible for consideration for affordable housing. In this respect, the views of the Housing Service should be sought regarding the local need for affordable housing.

4.7.3 For this purpose the occupancy of the property shall be restricted as follows:

The holiday unit/s shall be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence. The owners / operators of the holiday unit/s shall maintain an up-to-date register, log of the names of all owners / occupiers of the holiday unit/s on the site and of their main home addresses and shall make the information available at all reasonable times, to the Local Planning Authority.

If it can be demonstrated that the holiday unit is no longer viable, the following uses will be considered:

- a) a suitable alternative employment use, or occupied by a person solely or mainly working on a rural enterprise in the locality; where there is/was a defined functional need; or if it can be demonstrated that there is no eligible alternative employment use, to those:
- b) who would be eligible for consideration for affordable housing under the local authority's housing policies; or if it can be demonstrated that there are no persons eligible for occupation under (a);
- c) widows, widowers or civil partners of the above and any resident dependants.

4.7.4 The size of the converted or new holiday unit must not be excessive or it may not be affordable if, for some reason, the holiday property is no longer viable. Please note that this is relevant to properties classified as C3 use in the use class order.

4.8 Change of Use of Existing Hotels

4.8.1 Criteria 2 of Strategic Policy PS 14: The Visitor Economy states the Councils will support the development of a year-round local tourism industry by protecting and enhancing existing serviced accommodation. Applications for the change of use of hotels will be refused unless strong evidence is provided to prove that the hotel is no longer viable.

4.8.2 If the hotel is vacant and no longer functions as a business the applicant must prove that there has been a genuine attempt to market the business for sale for at least 12 months.

- 4.8.3 The evidence should include copies of the marketing/sales advertisements of the hotel together with written confirmation from the sales agents regarding the interest / proposals that have existed. It should be ensured that the marketing strategy to sell the business has targeted the most appropriate market i.e. the use of specialist agents that have an experience of marketing and selling hotels.
- 4.8.4 When considering proposals that would result in the change of use of a hotel, it will be necessary to receive financial evidence that the current business is not viable. A Financial Report should be submitted which proves that the current business has ceased to be financially viable and that it could not be expected to become financially viable in the future.

FINAL DRAFT

5.0 Static Caravan, Chalets and Permanent Alternative Camping Accommodation

Policy TWR 3: Static Caravan, Chalets and Permanent Alternative Camping Accommodation (see Appendix 1) provides the primary policy framework for the provision of new or the extension of existing sites. The main policy considerations are as follows:

- Type of units
- Standalone developments
- Significant intensification
- Coastal change management areas
- Using static caravans and chalets for residential purposes

5.1 Type of Units

5.1.1 The type of units that are acceptable under this policy are units which are capable of being dismantled and re-assembled elsewhere if required, they include prefabricated units which involve little construction on site.

- Caravan – means any structure designed for human habitation which is capable of being moved from one place to another as defined under the Caravan Sites and Control of Development Act 1960 (and amended by the Caravan Sites Act 1968).
- Chalet – A single storey semi-permanent prefabricated unit which can be dismantled and built elsewhere.
- Permanent Alternative Camping Accommodation - These are units, because of their degree of permanency, physical attachment to the ground and due to the nature of their design, cannot be entirely removed off site when not in use.

5.2 Standalone developments

5.2.1 Applications for standalone single caravans or chalets placed in a field or within the curtilage of residential dwellings without any associated facilities are not considered to be high quality development and therefore do not align with Policy TWR 3. These type of developments do not enhance the type and quality of tourist offer in the plan area and the cumulative effects of such developments can have a negative impact on the landscape.

5.3 Significant intensification

5.3.1 Policy TWR 3 stipulates that proposals for new static caravan or chalet developments which lie outside the Areas of Outstanding Natural Beauty (AONB) and Special Landscape Areas (SLAs) will only be permitted provided that the proposal conforms with the criteria listed within the policy. The first criteria states as follows:-

“i) it can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet sites in the locality.”

5.3.2 In order to define ‘intensification’ within the remit of Policy TWR 3, the explanation to the Policy refers to the ‘Isle of Anglesey, Gwynedd and Snowdonia National Park

Landscape Sensitivity and Capacity Study’ (Gillespies, 2014)⁸. Within the study each ‘Landscape Character Area’ (as defined by the Anglesey Landscape Strategy⁹ and the Gwynedd Landscape Strategy¹⁰) is assessed to determine the landscapes overall capacity for further caravan and chalet park developments. When considering applications for new developments, reference should therefore be made to the capacity of the local landscape as specified within the Landscape Sensitivity and Capacity Study.

- 5.3.3 The tables in Appendix 3 specify the various typologies for caravan and chalet park developments along with the overall capacity and sensitivity for each Landscape Character Area. The maps in Appendix 3 shows each Landscape Character Area and their capacity for static caravan and chalet developments.

5.4 Coastal Change Management Areas

- 5.4.1 Shoreline Management Plans (SMP) are developed by Coastal Groups with members mainly from local councils and the Environment Agency (which now forms part of Natural Resources Wales). They identify the most sustainable approach to managing the flood and coastal erosion risks to the coastline in the:

- short-term (up to 2025)
- medium term (2026 to 2055)
- long term (2056 to 2105)

The West Wales SMP 2¹¹ covers the plan area and provides a large-scale assessment of the risks associated with coastal processes during the above epochs and is the primary source of evidence in defining coastal change management areas. It sets a range of policies for the coastline which are:

- Hold the line
- No active intervention
- Managed realignment

- 5.4.2 Planning Policy Wales states that Local Authorities should help reduce the risk of flooding and the impact of coastal erosion by avoiding inappropriate development in vulnerable areas. A Coastal Change Management Area (CChMA) is defined where the accepted shoreline management plan policy is for ‘no active intervention’ or ‘managed realignment’ during the Plan period. Appendix 5 provides a schedule of coastal areas defined as the CChMA. The coastal areas included in the CChMA are those where the SMP 2 sets a ‘no active intervention’ or ‘managed realignment’ policy approach either up to 2025 or between 2026 and 2055 policy epochs or both policy epochs.

- 5.4.3 Policy TWR 3 does not allow for new units in the AONBs and SLAs. Criteria 2 of the policy, however, states that, in exceptional circumstances, proposals involving the relocation of an existing site already located in the AONBs or SLAs and the CChMA to another site outside CChMA provided that the new site is:

⁸ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Landscape-Sensitivity-and-Capacity-Assessment-\(DC.020\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Landscape-Sensitivity-and-Capacity-Assessment-(DC.020).pdf)

⁹ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Angesey-Landscape-Strategy---Update-2011-\(DC.011\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Angesey-Landscape-Strategy---Update-2011-(DC.011).pdf)

¹⁰ [https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Gwynedd-Landscape-Strategy-Update-2012-\(DC.010\).pdf](https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/Gwynedd-Landscape-Strategy-Update-2012-(DC.010).pdf)

¹¹ http://www.westofwalesmp.org/content.asp?nav=23&parent_directory_id=10

- i. of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and
- ii. located close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features. Preference will be given to brownfield sites.

5.5 Using static caravans and chalets for residential purposes

5.5.1 Caravans and other forms of non-permanent accommodation are generally considered to be unacceptable as permanent homes. However they may have a part to play in providing short term low cost accommodation where there is a proven need. Policy TAI 14: Residential Use of Caravans, Mobile Homes or other forms of Non-Permanent Accommodation provides the local policy framework to deal with such scenarios (see Appendix 1).

5.5.2 One of the possible scenarios includes making use of caravans and other forms of non-permanent accommodation as temporary accommodation required in association with an approved building project.

5.5.3 The following matters need to be considered when assessing a proposal for using caravans, mobile homes or other forms of non-permanent accommodation for temporary residential purposes:

1. Need
 - i. There is a demonstrable need for temporary residential accommodation for a limited period of time and the proposed use of caravans, mobile homes and other forms of non-permanent accommodation forms part of a robust construction worker accommodation strategy; ;
2. Location and accessibility
 - i. The proposed site is not located within an AONB or Special Landscape Area
 - ii. Outside an AONB or Special Landscape Area, the proposal doesn't lead to a significant intensification in the provision of static caravans, chalet or permanent alternative camping sites in the locality
 - iii. The proposed site is located within an agreed traveling distance from the approved building project and set out in the construction worker accommodation strategy.
 - iv. The proposed sites is well related to existing settlements in order to facilitate access to services and facilities such as health and retail.
 - v. The proposed site is located close to the main highway network and is close to public transport interchanges, bus routes and any park and ride parks/pickups in order to reduce dependency on the use of the private car.
 - vi. Adequate access can be provided without significantly harming landscape characteristics and features
3. Type and suitability of the accommodation and site
 - i. The unit must be suitable for year round occupancy in terms of, for example, adequate heating, ventilation and air conditioning
 - ii. The site must be deemed suitable for year round occupancy especially during the winter months where adverse weather could cause problems.
 - iii. The proposed development is of a high quality in terms of design, layout and appearance and is sited in an unobtrusive location, which is well screened by existing landscape features

- 5.5.4 For the avoidance of doubt, the use of touring caravans, camping or temporary alternative camping sites for temporary residential use is not promoted by Policy TWR 5 as touring caravan, tents and temporary alternative camping accommodation sites provide pitches for caravans, etc that are 'on tour', are not open throughout the year and are not deemed suitable for occupation during the winter months.

FINAL DRAFT

6.0 Touring Caravan, Camping and Temporary Alternative Camping Accommodation

Policy TWR 5: Touring Caravan, Camping and Temporary Alternative Camping Accommodation (see Appendix 1) provides the primary policy framework for the provision of new or the extension of existing sites. The main policy considerations are as follows:

- Type of Units
- Landscape considerations
- Highway considerations
- Periods of operation
- Ancillary facilities
- Excessive use of hardstanding and man-made features

6.1 Type of Units

6.1.1 The type of units covered by this policy include touring caravans, motorhomes, campervans, tents and temporary alternative camping accommodation such as bell tents and tee pees. Typically the holiday accommodation units covered by this policy have infrastructure requirements in the form of amenity blocks as many forms of units do not contain facilities such as toilets, showers and kitchens.

6.1.2 Temporary alternative camping units have less impacts on the landscape than permanent alternative camping accommodation (please see paragraph 5.1.1) and can be removed when not in use. Applicants will have to demonstrate how the unit will be removed when not in use.

6.2 Landscape considerations

6.2.1 Although in use for only part of the year, touring caravan and camping sites are often situated in prominent and open locations and can be very intrusive in the open countryside, particularly on the coast. Particularly heavily pressurised areas exist in many communities located on or near to the coast, including extensive parts of the Areas of Outstanding Natural Beauty. Appropriate consideration needs to be given to the cumulative impact of the proposal. As part of the considerations of the cumulative impact the Authority will require evidence to demonstrate that proposals for further units of accommodation in such areas will not add to servicing problems, or generate unacceptable traffic impacts or unacceptable harm the character or natural resources of these areas, following mitigation.

6.2.2 National Planning Policy guidance states that the primary objective for designating AONBs is the conservation and enhancement of their natural beauty. Development plan policies and development management decisions affecting AONBs should favour conservation of natural beauty, although it will also be appropriate to have regard to the economic and social well-being of the areas. Local authorities, other public bodies and other relevant authorities have a statutory duty to have regard to AONB purposes (PPW 5.3.5).

6.2.3 Both AONBs have a management plan that sets out the characteristics and special qualities of the landscape of the designation and how they will be conserved and enhanced¹². All developments within the AONBs (and areas that contribute to their

¹² <http://www.ahne-llyn-aonb.org/1/en-GB/Home>

setting) must have regard for these special qualities (Policy PS 19 and Policy AMG 1). Applications that have a significant impact on these special qualities will be refused (Policy PS 19).

6.2.4 As with all applications, the scale of development, landscape setting, site layout and screening are important considerations in assessing proposals. In all cases the applicant will need to submit a landscaping scheme (Policy PCYFF 4 – see section 3.2). Site design considerations can include:

- Avoid dense layouts with regimented rows
- Respond to the shape of landform, field patterns, and location of trees and other natural/ cultural features of the site for sustainable integration
- Use recessive natural colours for better visual integration within the landscape
- Minimise the influence of night time lighting. Use shielded lamps to avoid obtrusive lighting and locate lighting to protect night time character of the countryside

6.3 Highway considerations

6.3.1 It is important that new sites are located as close as possible to the main highway network (i.e. 'A' and 'B' class roads). Unclassified rural roads are generally single track lanes and are considered unsuitable for heavy volumes of traffic. Any proposal which in the Authority's opinion is not sited within close proximity to the main highway network will not be supported. Furthermore, these roads are generally bounded by natural/man made features (e.g. stone walls, cloddiau, hedgerows) which are important to the visual character of rural areas. Providing suitable access from new sites onto these roads may require the removal of important landscape features. The importance of such features are identified in the LANDMAP study and the Authority will be guided by the findings of this study. The Authority will expect applicants to demonstrate how they have considered the information provided by the LANDMAP study (see paragraph 6.2.1).

6.4 Periods of Operation

6.4.1 New touring, camping and temporary alternative camping sites may be permitted in areas where static caravan, chalets and permanent alternative camping sites are not i.e. AONBs and SLAs, because they can be considered acceptable in land use planning terms as having less impact on the landscape than static sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local environment. Policy TWR 5 does not promote the development of 'static touring sites' whereby the unit is left permanently on site throughout the whole holiday season and used only occasionally by its owner or other visitors. By allowing the units to stay on site all year round they have the same effect, in terms of land use planning and visual impact, as a new static caravan or chalet site. Criterion 7 of policy TWR 4 clearly stipulates that the site is used for touring purposes only and that any units are removed from site during periods when not in use. Where planning permission is granted for new touring sites a planning condition will be attached to the permission limiting the use of the site for touring purposes only.

6.4.2 Paragraph 6.3.87 states that since the countryside looks very different during the winter months, a condition will be attached to planning permissions for all new sites

<http://www.anglesey.gov.uk/planning-and-waste/countryside/areas-of-outstanding-natural-beauty-aonbs>

approved, limiting the operational period of the site to between 1st March and 31st October of the same year.

6.5 Ancillary facilities

- 6.5.1 Amenity blocks (showers, toilets, laundry and kitchen areas) are often required to accompany new touring caravan, camping and temporary alternative camping accommodation sites because these facilities are not usually incorporated within the accommodation itself. In such instances, the first preference for these facilities would be for the conversion of suitable existing buildings (as stated in criteria 4 of policy TWR 5. Where this is not possible, the need for new facilities needs to be clearly demonstrated, commensurate with the scale of the development, situated as near as possible to existing buildings, well screened and subject to other relevant policy considerations, including landscape impact. Careful consideration should be given to the scale and design of amenity facilities so that they are proportionate to the scale of the permitted site and to ensure the any harmful landscape and environmental impacts are minimised.
- 6.5.2 Ancillary facilities should be shared facilities and not individual facilities per pitch as to minimise the effect on the landscape.

6.6 Excessive use of hard standings and man-made features

- 6.6.1 In order to ensure minimum visual impact upon the landscape, especially during the closed season when there are no units on site, the proposed development should avoid excessive use of hard standings and man-made features. Where possible, measures should be taken to restore the site to its original state when not in use / during the closed season.
- 6.6.2 The use of hard standing for every touring units is not considered appropriate as they become a permanent feature on the landscape. Sites that require excessive hard standing because of local site conditions are considered unsuitable.
- 6.6.3 The JLDP and national planning policy guidance promotes the use of Sustainable Urban Drainage Systems (SUDS) (policy PS 5; Sustainable Development and policy PCYFF 6: Water Conservation). Policy PCYFF 4 states that permeable surfaces should be used.

7.0 Occupancy Conditions

- 7.1 Statistics¹³ show that the nature of holidays in the Plan area has become more diverse in location, season and duration in recent years. More people are choosing short breaks outside the traditional summer months. Both national and local planning guidance recognises the importance of having a year round sustainable tourism economy.
- 7.2 Whilst extending the season has many advantages in terms of supporting the tourist economy and reducing the disadvantages of seasonal staff, the demand for holiday accommodation may occur in areas which the provision of permanent housing would be contrary to national planning guidance. In all cases, the use of such visitor accommodation for permanent occupancy will not be acceptable. Holiday accommodation of all types must remain for the intended tourism purpose only so that the wider economic benefits are secured. Planning conditions will be used to ensure compliance.
- 7.3 Policy TWR 4 allows for proposals to extend the holiday season provided that:
- It can be demonstrated that the accommodation is being used exclusively for holiday purposes and does not become the occupant's main residence;
 - The accommodation **and** site is suitable for occupation during the winter months;
 - The extended season would not increase the consequences of an extreme flooding event;
 - The extended season will not have a detrimental effect on the local environment.
- 7.4 In order to ensure that the holiday accommodation is being used exclusively for the use intended the owners must keep an up to date register of the names of all owner/occupiers of the units and their main home address and be made available at all reasonable times to the local planning authority.
- 7.5 A seasonal occupancy condition will be imposed on all proposals which do not comply with the criteria in policy TWR4. Seasonal occupancy conditions will be placed on all new touring caravan, camping and temporary glamping sites.

¹³ STEAM Report 2016

8.0 Visitor Attractions and Facilities

Policy TWR 1: Visitor Attractions and Facilities (see Appendix 1) provides the primary policy framework for the provision of new or the extension of existing visitor attractions and facilities.

8.1 Location of Development

8.1.1 This policy aims to encourage the development of high quality sustainable tourism attractions and facilities in the right place. New attractions and facilities should be located, where possible, within settlement development boundaries where visitors can access a range of services by a choice of travel modes.

8.1.2 The policy stipulates that where there are no opportunities are available for development within the development boundary the Authority would consider other locations as follows:

- i. Re-using a suitable existing building – outside development boundaries proposals should first look at re-using existing buildings. More information regarding converting existing buildings can be found in section 5.2
- ii. Suitable previously developed land – please see section 5.3
- iii. A site closely related to other existing buildings that forms part of an existing tourist facility – new build developments could be permitted in certain areas of the open countryside if it can be demonstrated there are no sequentially preferable sites within development boundaries or no suitable existing building to re-use. On sites outside existing settlements, the Councils will permit tourism developments only in exceptional circumstances where the applicant has been able to demonstrate specific locational requirements and economic benefits which would justify allowing the proposal.
- iv. An activity restricted to a specific location due to its appropriate use of an existing historical or natural resource or its proximity to the attraction which it relates – the Plan recognises that some new tourism attractions and facilities will have specific locational requirements such as a lake or woodland. The criteria used to assess the its proximity to the attraction it relates includes the degree of separation and physical distance from the attraction. The landscape and visual impact of the proposed development and the ability to integrate the development into the landscape and townscape will also be important considerations in assessing the proposed development’s suitability.

9.0 Further Information & Contacts

For further information please contact the:

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<http://www.anglesey.gov.uk/planning-and-waste/planning-control/>

Appendix 1 – Relevant JLDP Policies¹⁴

STRATEGIC POLICY PS 1: WELSH LANGUAGE AND CULTURE

The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:

1. Requiring a Welsh Language Statement, which will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:
 - a. Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq. m. or more; or
 - b. Residential development which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies TAI 1 – TAI 6; or
 - c. Residential development of 5 or more housing units on allocated or windfall sites within development boundaries that doesn't address evidence of need and demand for housing recorded in a Housing Market Assessments and other relevant local sources of evidence.
2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow;
3. Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms;
4. Requiring a bilingual Signage Scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies;
5. Expect that Welsh names are used for new developments, house and street names.

STRATEGIC POLICY PS 5: SUSTAINABLE DEVELOPMENT

Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should:

1. Alleviate the causes of climate change and adapting to those impacts that are unavoidable in accordance with Strategic Policy PS 6;
2. Give priority to effective use of land and infrastructure, prioritizing wherever possible the reuse of previously developed land and buildings within the development boundaries of Sub Regional Centre, Urban and Local Service Centres, Villages or in the most appropriate places outside them in accordance with Strategic Policy PS 17, PS 13 and PS 14;
3. Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;

¹⁴ www.gwynedd.gov.uk/ldp

4. Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1;
5. Preserve and enhance the quality of the built and historic environment assets (including their setting), improving the understanding, appreciation of their social and economic contribution and sustainable use of them in accordance with Strategic Policy PS 20;
6. Protect and improve the quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make in accordance with Strategic Policy PS 19;
7. Reduce the effect on local resources, avoiding pollution and incorporating sustainable building principles in order to contribute to energy conservation and efficiency; using renewable energy; reducing / recycling waste; using materials from sustainable sources; and protecting soil quality;
8. Reduce the amount of water used and wasted; reducing the effect on water resources and quality; managing flood risk and maximizing use of sustainable drainage schemes; and progressing the objectives of the Western Wales River Basin Water Management Plan.

Proposals should also where appropriate:

9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units in accordance with Strategic Policy PS 16;
10. Promote a varied and responsive local economy that encourages investment and that will support Centres, Villages and rural areas in accordance with Strategic Policy PS 13;
11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13;
12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport in accordance with Strategic Policy PS 4;
13. Promote high standards of design that make a positive contribution to the local area, accessible places, that can respond to future requirements and that reduce crime, antisocial behaviour and the fear of crime in accordance with Policy PCYFF 3.

POLICY PCYFF 2: DEVELOPMENT CRITERIA

A proposal should demonstrate its compliance with:

1. Relevant policies in the Plan;
2. National planning policy and guidance.

Proposals should:

3. Make the most efficient use of land, including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances or site constraints that dictate a lower density);
4. Provide appropriate amenity space to serve existing and future occupants;

5. Include provision for storing, recycling and waste management during the construction period and occupancy period;
6. Include, where applicable, provision for the appropriate management and eradication of invasive species;

Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:

7. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance;
8. Land allocated for other development/ uses.

POLICY PCYFF 3: DESIGN AND PLACE SHAPING

All proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Innovative and energy efficient design will be particularly encouraged.

Proposal, including extensions and alterations to existing buildings and structures will only be permitted provided they conform to all of the following criteria, where relevant:

1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
2. It respects the context of the site and its place within the local landscape, including its impact on important principal gateways into Gwynedd or into Anglesey, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate, in line with Policy PCYFF 4;
4. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
5. It plays a full role in achieving and enhancing a safe and integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
6. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;
7. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities;
8. Where practical, include infrastructure for modern telecommunications and information;
9. Encourage active frontages at ground level where development is non-residential;
10. It helps create healthy and active environments, and considers the health and well-being of future users.

POLICY PCYFF 4: DESIGN AND LANDSCAPING

All proposals should integrate into their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused. A landscape scheme should, where relevant:

1. Demonstrate how the proposed development has given due consideration to the Landscape Character Area Assessment or Seascape Character Area Assessment;
2. Demonstrate how the proposed development respects the natural contours of the landscape;
3. Demonstrate how the proposed development respects and protects local and strategic views;
4. Respect, retain and complement any existing positive natural features, landscapes, or other features on site;
5. Identify trees, hedgerows, water courses and topographical features to be retained;
6. Provide justification for circumstances where the removal/loss of existing trees, hedgerows, water courses and topographical features cannot be avoided and provides details of replacements;
7. Provide details of any proposed new landscaping together with a phased programme of planting;
8. Demonstrate that any proposed new planting includes plants and trees of mainly native species of local provenance and does not include any non-native invasive species;
9. Ensure that selection of species and planting position of any trees allows for them to grow to their mature height without detriment to nearby buildings, services and other planting; and
10. Provide permeable hard surface landscaping.

POLICY ARNA 1: COASTAL CHANGE MANAGEMENT AREA

A Coastal Change Management Area (CChMA) is identified in Appendix 6.

New Residential Development

Proposals for new dwellings, replacement dwellings, subdivisions of existing buildings to residential use or conversion of existing buildings to residential use will be refused in the CChMA.

Relocation of Existing Permanent Dwellings in the Countryside

Proposals for the relocation of existing permanent dwellings in the countryside located in the CChMA predicted to be affected by coastal erosion and/or flood risk will be permitted provided they conform to the following criteria:

1. The development replaces a permanent dwelling which is affected or threatened by erosion and/or flood risk within 20 years of the date of the proposal; and
2. The relocated dwelling is located an appropriate distance inland with regard to CChMA and other information in the Shoreline Management Plan and where possible it is in a location that is:
 - i. in the case of an agricultural dwelling, within the farm holding or within or immediately adjacent to existing settlements, or

- ii. within or immediately adjacent to existing settlements close to the location from which it was displaced;
3. The existing site is cleared and made safe; and
4. The proposal should result in no detrimental impact on the landscape, townscape or biodiversity of the area.

New or Existing Non-Residential Buildings

5. New non-residential permanent buildings not associated with an existing use or building will not be permitted in areas within the CChMA predicted as being at risk from coastal change during the first indicative policy epoch up to 2025.
6. Proposals for the following types of new non-residential development will be permitted on sites within the CChMA predicted as being at risk from coastal change during the second indicative policy epoch (2026 – 2055), subject to a compliant Flood Consequence Assessment or a Stability Assessment:
 - i. development directly linked to the coastal area (e.g. beach huts, cafés, tea rooms, shops, short let holiday accommodation, touring caravan sites, camping sites, leisure activities); and
 - ii. providing substantial economic and social benefits to the community; and
 - iii. where it can be demonstrated that there will be no increased risk to life, nor any significant risk to property; and
 - iv. subject to either time-limited and/ or season-limited planning permission, as appropriate.
7. Redevelopment of, or extensions to, existing non-residential property or intensification of existing non-residential land uses on sites within the CChMA, will be permitted where it can be demonstrated by a TAN 15 compliant Flood Consequences Assessment or a Stability Assessment that there will be no increased risk to life, nor any significant risk to property and subject to a time-limited planning permission (where appropriate) and that the development complies with TAN 15 over the period of its permission.

Extensions to Existing Dwellings, Community Facilities or Services or Infrastructure

Proposals for the following types of development will be permitted in the CChMA, subject to a TAN 15 compliant Flood Consequences Assessment or a Stability Assessment:

8. Limited residential extensions that are closely related to the existing scale of the property and therefore doesn't result in a potential increase in the number of people living in the property;
9. Ancillary development within the curtilage of existing dwellings that require planning permission;
10. Key community infrastructure, which has to be sited in the CChMA to provide the intended benefit for the wider community and there are clear plans to manage the impact of coastal change on it and the services it provides;
11. Essential infrastructure, e.g. roads, provided that there are clear plans to manage the impact of coastal change on it, and that it will not have an adverse impact on rates of coastal change elsewhere.

New or Replacement Coastal Defence Scheme

Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the Shoreline Management Plan, and there will be no material adverse impact on the environment.

Managing Development

Planning conditions will be applied or a planning obligation will be secured where there is a need to: limit the planned life of a development or seasonal use; remove a time-limited development or existing dwellings on cessation of use; review relevant planning permissions; manage the occupancy of a relocated dwelling.

POLICY TWR 1: VISITOR ATTRACTIONS AND FACILITIES

Proposals to develop new visitor attractions and facilities or to improve and extend the standard of existing facilities will be encouraged to locate to sites within the development boundary.

Where there are no suitable opportunities within the development boundary, only proposals that involve the following will be granted:

1. The re-use of an existing building(s) or a suitable previously used site; or
2. The re-use of an existing building(s) or a site closely related to other existing buildings that forms part of an existing tourist facility; or
3. An activity restricted to a specific location due to its appropriate use of a historical or natural resource or its proximity to the attraction which it relates.

All proposals will be required to comply with all the following criteria:

- i. The scale, type and character of the proposed development is appropriate for its urban/rural setting;
- ii. The proposed development is of high quality in terms of design, layout and appearance;
- iii. The proposed development will support and extend the range of facilities within the Plan area;
- iv. The proposal is supported by evidence to demonstrate that there would be local employment opportunities.

Where appropriate, the development can be accessed by various modes of transport, especially sustainable modes of transport, such as walking, cycling and public transport.

POLICY TWR 2: HOLIDAY ACCOMMODATION

Proposals for:

1. The development of new permanent serviced or self-serviced holiday accommodation, or
2. The conversion of existing buildings into such accommodation, or
3. Extending existing holiday accommodation establishments,

will be permitted, provided they are of a high quality in terms of design, layout and appearance and that all the following criteria can be met:

- i. In the case of new build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site;
- ii. That the proposed development is appropriate in scale considering the site, location and/or settlement in question;
- iii. That the proposal will not result in a loss of permanent housing stock;
- iv. That the development is not sited within a primarily residential area or does not significantly harm the residential character of an area;
- v. That the development does not lead to an over-concentration of such accommodation within the area.

POLICY TWR 3: STATIC CARAVAN AND CHALET SITES AND PERMANENT ALTERNATIVE CAMPING ACCOMMODATION

1. Proposals for the development of new static caravan¹⁵ (i.e. single or twin caravan), holiday chalet¹⁶ sites or permanent alternative camping accommodation will be refused within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas. In other locations proposals for new static caravan or holiday chalet sites and permanent alternative camping accommodation will only be granted where:
 - a. It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and
 - b. That the proposed development is of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and
 - c. That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features.
2. In exceptional circumstances, proposals involving the relocation of an existing static or chalet site already located in the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas that forms part of the Coastal Change Management Area to another site will only be permitted providing that criteria 1. i – iii are met and the new site is located outside the Coastal Change Management Area.
3. Within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static and chalet sites by:
 - i. minor extensions to the site area, and/or

¹⁵ Defined under the Caravan Sites and Control of Development Act 1960 (as amended by the Caravan Sites Act 1968)

¹⁶ For the purpose of this Plan, a holiday chalet will be defined as any structure or suitable building intended for use as holiday accommodation, which is not defined by the statutory definition of caravan, that is:

- when it is not possible to transport the structure to the site in one piece, and/or
- that the structure/building prior to assembly is composed of more than two parts; and/or
- that the structure is placed on a purpose-built foundation, and /or
- that the structure, once assembled, cannot be removed from the site in one piece

- ii. the relocation of units from prominent settings to less prominent locations,

will be permitted providing all of the following criteria can be met:

- iii. the improvements does not increase the number of static caravan or chalet units on the site unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area;
- iv. that the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
- v. in the case of a site located within the Coastal Change Management Area, that the proposed development is also part of a scheme to improve the safety of occupiers or occupiers of caravans or chalets;
- vi. that the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- vii. is appropriate when considered against other policies in the Plan

4. Outside the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static caravan and chalet sites by:

- i. minor extensions to the site area, and/or
- ii. the relocation of units from prominent settings to less prominent locations, and/or,
- iii. a minor increase in the number of units on site,

will be permitted providing all of the following criteria can be met:

- iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
- v. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- vi. In the case of a site located within the Coastal Change Management Area, that the proposed development is part of a scheme to improve the safety of occupiers of occupiers of caravans or chalets;
- vii. That any increase in the number of static holiday caravan or holiday chalet units is minor and is commensurate with the scale of any improvements to the site;
- viii. Is appropriate when considered against other policies in the Plan

POLICY TWR 4: HOLIDAY OCCUPANCY

Proposals for new static caravans and chalets or proposals to extend the holiday season of existing static caravan and chalet sites will be granted provided it can be demonstrated that the accommodation is being used exclusively for holiday purposes and does not become the occupant's main or sole place of residence.

In cases involving extending the holiday season of existing static caravan and chalet sites, the following criteria must be satisfied:

1. The accommodation and site is suitable for occupation during the winter months;
2. The extended season would not increase the consequences of an extreme flooding event;

3. The extended season will not have a detrimental effect on the local environment.

POLICY TAI 14: RESIDENTIAL USE OF CARAVANS

New caravan or other forms of non-permanent accommodation sites for temporary residential use

As an exception to Strategic Policy PS 17 and Policy TAI 16, a proposal for a new site involving the siting of caravans or other forms of non-permanent accommodation for the purpose of temporary residential use will be granted planning permission, provided it conforms to all the following criteria:

1. The siting is for a limited period of time, and is required to accommodate temporary workers during construction of a specific approved building project; or
2. There is a proven need for a single caravan or other form of non-permanent accommodation in connection with the establishment of a new rural based enterprise, in line with national planning policy and guidance.

In the case of scenario 1 above:

- i. the siting of temporary residential caravans or other forms of non-permanent accommodation will be subject to the same locational considerations as set out in Policy TWR 3; and
- ii. the site is located so as to minimise the need to travel and promotes the use of sustainable transport modes to the approved building project site or a park and ride facility provided by the building project promoter; and
- iii. it can be demonstrated that the accommodation facilitates the delivery of the building project's construction workers' accommodation strategy.

Existing holiday caravans or other forms of non-permanent holiday accommodation

A proposal involving occupation of existing holiday caravans or other forms of non-permanent accommodation outside the usual occupancy season or the extension of existing sites for the purpose of temporary residential use will be granted planning permission, provided they conform to all the following criteria:

3. There is a proven need for temporary residential accommodation in association with an approved building project; and
4. The site is located so as to minimise the need to travel and promotes the use of sustainable transport modes to the approved building project site or a park and ride facility provided by the building project promoter; and
5. It can be demonstrated that the construction worker accommodation facilitates the delivery of the building project's construction workers' accommodation strategy; and
6. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry;
7. The proposal is appropriate when considered against Policy TWR 3.

Mechanisms to manage the development

Where planning permission is granted a planning condition will be attached, or an obligation will be secured, to ensure that:

8. Occupancy of the caravans or other form of non-permanent accommodation is confined to persons able to demonstrate the essential need for the accommodation; and
9. The permission is for a time-limited period only and, after which time the need for the accommodation ceases, the caravan or other form of non-permanent accommodation shall be removed from the site and the land restored to its former condition within a specified period, or serviced plots are retained for a future policy conforming use.

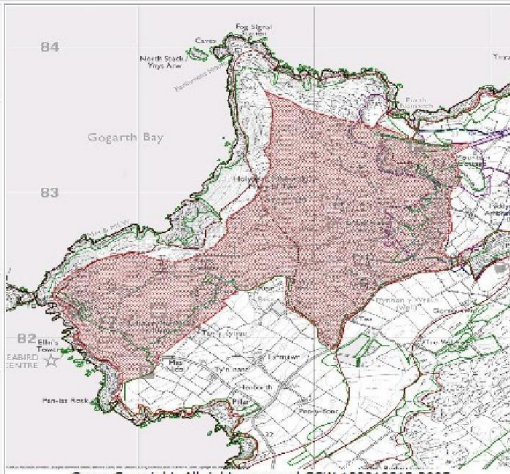
In the case of temporary residential caravans approved in accordance with this Policy, applications to renew temporary permissions will be assessed against the above criteria.

POLICY TWR 5: TOURING CARAVAN, CAMPING AND TEMPORARY ALTERNATIVE CAMPING ACCOMMODATION

Proposals for new touring caravan, camping or temporary alternative camping sites, extensions to existing sites or additional pitches will be granted provided they conform to the following criteria:

1. That the proposed development is of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape;
2. Avoids excessive areas of hard standing;
3. Have limited physical connection to the ground and is capable of being removed off the site out of season;
4. Any ancillary facilities should, if possible, be located within an existing building or as an extension to existing facilities. If no suitable buildings are available, the need for additional facilities needs to be clearly demonstrated and commensurate with the scale of the development.
5. That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features;
6. Occupation is limited to holiday use.
7. That the site is used for touring purposes only and any units are removed from the site during periods when not in use.

Appendix 2 – LANDMAP Collector File Example (paragraph 3.6.2)

Visual and Sensory	
Aspect Area Name	Holyhead Mountain
Aspect Area Classification	Upland/Hills, Lower Plateau & Scarp Slopes/Hillside & Scarp Slopes Moorland (Level 3)
Aspect Area Code	YNSMNV001
Date Of Survey : 25/01/2007	
	
Description	
Physical Form And Elements: Topographic Form?	High Hills/Mountains
Physical Form And Elements: Landcover Pattern?	Open Land
Aesthetic Qualities: Scale?	Vast
Aesthetic Qualities: Sense of Enclosure?	Exposed
Aesthetic Qualities: Diversity?	Simple
Aesthetic Qualities: Texture?	Rock Exposure
Aesthetic Qualities: Lines?	Angular
Aesthetic Qualities: Colour?	Moderate Contrasts
Aesthetic Qualities: Balance?	Harmonious
Aesthetic Qualities: Unity?	Unity
Aesthetic Qualities: Pattern?	Random
Aesthetic Qualities: Seasonal Interest?	Summer (Heather & gorse)
Other Factors: Level of Human Access?	Occasional
Other Factors: Night Time Light Pollution?	Negligible (Few buildings)
Other Factors: Use of Construction Materials?	Appropriate
What materials? Give Details:	Local stone
There are attractive views...	...both in and out (In from coastal path, Holyhead, much of Holy Island & n-w Anglesey. Out across sea to Llyn, Anglesey coast, Isle of Man, Ireland, Lake District, etc.)
There are detractive views...	...neither in or out (No major detractors in view)
Perceptual and Other Sensory Qualities	Attractive Tranquil Exposed Threatening Remote Wild Spiritual Smell
What is the sense of place/local distinctiveness	Strong (Unique location overlooking Anglesey & sea. Wildest part of Anglesey, but close to Holyhead.)
Evaluation	
Value:	Outstanding (Isolated wild mountain rising from sea, unspoilt, distinct landmark, fine views)
Condition:	Good (Mainly managed for wildlife)
Trend:	Constant (No change anticipated)
Recommendations	
Define the key qualities that should be conserved:	wildness, remoteness
Define the key qualities that should be enhanced:	
Define the key elements that should be conserved:	Upland moor habitats. Prehistoric & recent historic remains. Footpaths.
Define the key elements that should be enhanced:	Footpaths
Define the key elements that should be changed:	
Principal management recommendation:	Continue management with limited public access and interpretation, plus natural & historic conservation.
Tolerance To Change	
Are there any significant threats to the current integrity and condition of the visual & sensory features of the area?	Not known
Aspect Area Boundary	
To what level was this information site-surveyed?	Level 3
At 1:10,000, how much of the Aspect Area boundary is precise?	Most (Mainly follows walls)
What baseline information source was used for Aspect Area boundary mapping?	OS Raster
If OS Data was used, what was the scale?	1:25,000
What is the justification for the Aspect Area boundaries?	Boundary with fields to south. Break in slope with cliffs to seaward sides.
Bibliography	
List the key sources used for this assessment	"Mon Mam Cymru - The Guide to Anglesey" by P. Steele & R. Williams 2006
Assessment	

Additional Assessments	
Additional Comments	
Evaluation Matrix	
Evaluation Criteria: Overall Evaluation	Outstanding (Isolated wild mountain rising from sea, unspoilt, distinct landmark, fine views)
Justification of overall evaluation	mainly outstanding
Evaluation Criteria: Scenic quality	Outstanding (Isolated wild craggy mountain adjacent to coast. Fine panoramic views.)
Evaluation Criteria: Integrity	High (No major intrusive development, but masts, former quarries, etc.)
Evaluation Criteria: Character	Outstanding (Very distinctive landmark.)
Evaluation Criteria: Rarity	Outstanding (Only high hill on Anglesey. Isolated, unlike most mountains in Wales.)
Description	
Summary Description	On the north-west end of Holy Island, this is the highest hill on Anglesey, at 220m, rising steeply from the sea. It has a distinctive rounded profile seen from many parts of western Anglesey and as a landmark on approaching Holyhead from Ireland. Most of the mountain is open rocky moorland, with wildlife and historic interest. At the base of the eastern slopes is the Breakwater Quarry, now a country park, and Gorman, its associated quarry village with scattered houses and smallholdings. Considering its close proximity to Holyhead there is surprisingly little access, making it feel remote. There are fine panoramic views across Anglesey and the sea to Lleyn peninsula and Snowdonia in the distance. On a clear day the Lake District, Isle of Mann and Ireland can also be seen.
Physical form and elements: Settlement pattern	Linear
Physical form and elements: Boundary type	Stone Walls
Recommendations	
Existing management	Generally Appropriate
Existing management remarks:	Open access & country park.
Monitoring	
Has the information ever been verified in the field?	Yes (1:25000)
Does this area have a special or functional link with an adjacent area?	Yes (South Stack/North Stack cliffs (055). Backdrop to Holyhead (056))
During which season(s) was fieldwork carried out?	Late Summer
Date of monitoring?	2015-02-06
Monitoring undertaken by	Stages 1, 2 and 3 change detection, field verification and amendment completed by Bronwen Thomas, in conjunction with the planning authority. Quality Assurance completed by White Consultants.
Has this record been updated following monitoring work?	This record remains unchanged following monitoring work
Change indicated by	

Appendix 3 – Sensitivity and Capacity Maps (paragraph 5.3.3)

Development typologies

Site Typology	Indicative Criteria
Very Small	Up to 10 units (typically below 1 hectare in area)
Small	11 – 25 units (typically below 2 hectares in area)
Medium	26 – 75 (typically below 10 hectares in area)
Large	76 – 200 (typically below 15 hectares in area)
Very Large	Over 200 units (typically over 15 hectares in area)

Sensitivity Levels

Sensitivity	Definition
Very High	The key characteristics and qualities of the landscape are very highly sensitive to change from the type and scale of development being assessed.
High	The key characteristics and qualities of the landscape are highly sensitive to change from the type and scale of development being assessed.
Medium-High	The key characteristics and qualities of the landscape are sensitive to change from the type and scale of development being assessed.
Medium	Some of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of development being assessed.
Low-Medium	Few of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of development being assessed.
Low	Key characteristics and qualities of the landscape are robust and less likely to be adversely affected by the type and scale of development being assessed.

Capacity within each LCA

LCA	Indicative Overall Capacity	Sensitivity
Gwynedd		
G01	Within all areas that contribute to the setting of the National Park there is typically no capacity for static caravan/chalet park developments . However, outside these areas there may be some capacity for very small to small , well designed and sited static caravan/chalet park developments.	
G02	Within the SLAs (and all areas that contribute to their setting and the setting of the National Park), there is typically no capacity for static caravan/chalet park developments . Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	
G03	Within the SLA (and all areas that contribute to its setting and the setting of the National Park), there is typically no capacity for static caravan/chalet park developments . Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	

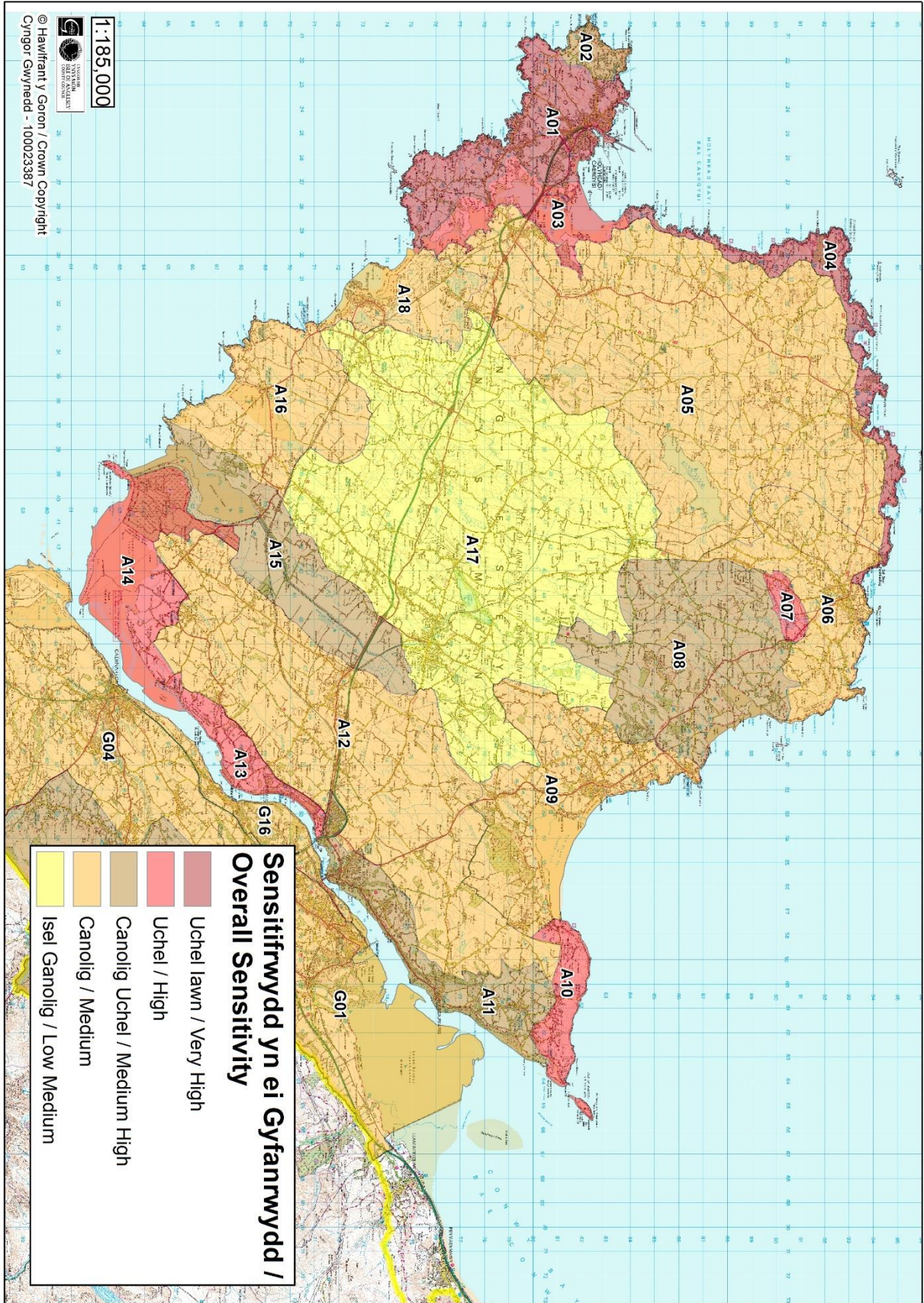
LCA	Indicative Overall Capacity	Sensitivity
G04	<p>Within the AONB and SLAs (and all areas that contribute to their setting and the setting of the National Park and WHS), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments, which should relate well to the existing built environment/urban landcover.</p>	
G05	<p>Within the SLA (and all areas that contribute to its setting and the setting of the AONB and National Park), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside these areas there may be some capacity for sensitively sited and well-designed very small developments, which should relate well to the existing built environment/urban landcover.</p>	
G06	<p>Typically no capacity for static caravan/chalet park developments (with the exception of very infrequent, very small scale development which should relate well to existing settlement/buildings).</p>	
G07	<p>Due to the considerable numbers of static caravan/chalet parks, there is very limited capacity, if any, for further static caravan/chalet park developments and extensions.</p>	
G08	<p>Within the areas that contribute to the setting of the SLAs and the National Park, there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments, which should relate well to the existing built environment/urban landcover.</p> <p>In all cases development should avoid the undeveloped coastal edge and its immediate setting and should be clearly separated so that their effects remain local and there is no collective/cumulative defining influence on the landscape.</p>	
G09	<p>Due to the considerable numbers of static caravan/chalet parks, in combination with the overall higher sensitivity, there is no capacity for further static caravan/chalet park developments and extensions.</p>	
G10	<p>Within the AONB and SLAs (and all areas that contribute to their setting and the setting of the National Park), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments, which should relate well to the existing built environment/urban landcover.</p> <p>In all cases development should avoid the undeveloped coastal edge and its immediate setting and should be clearly separated so that their effects remain local and there is no collective/cumulative defining influence on the landscape.</p>	
G11	<p>Within areas that contribute to the outlook and setting of the National Park and ELDP Areas of Natural Beauty, there is typically no capacity for static caravan/chalet park developments.</p>	

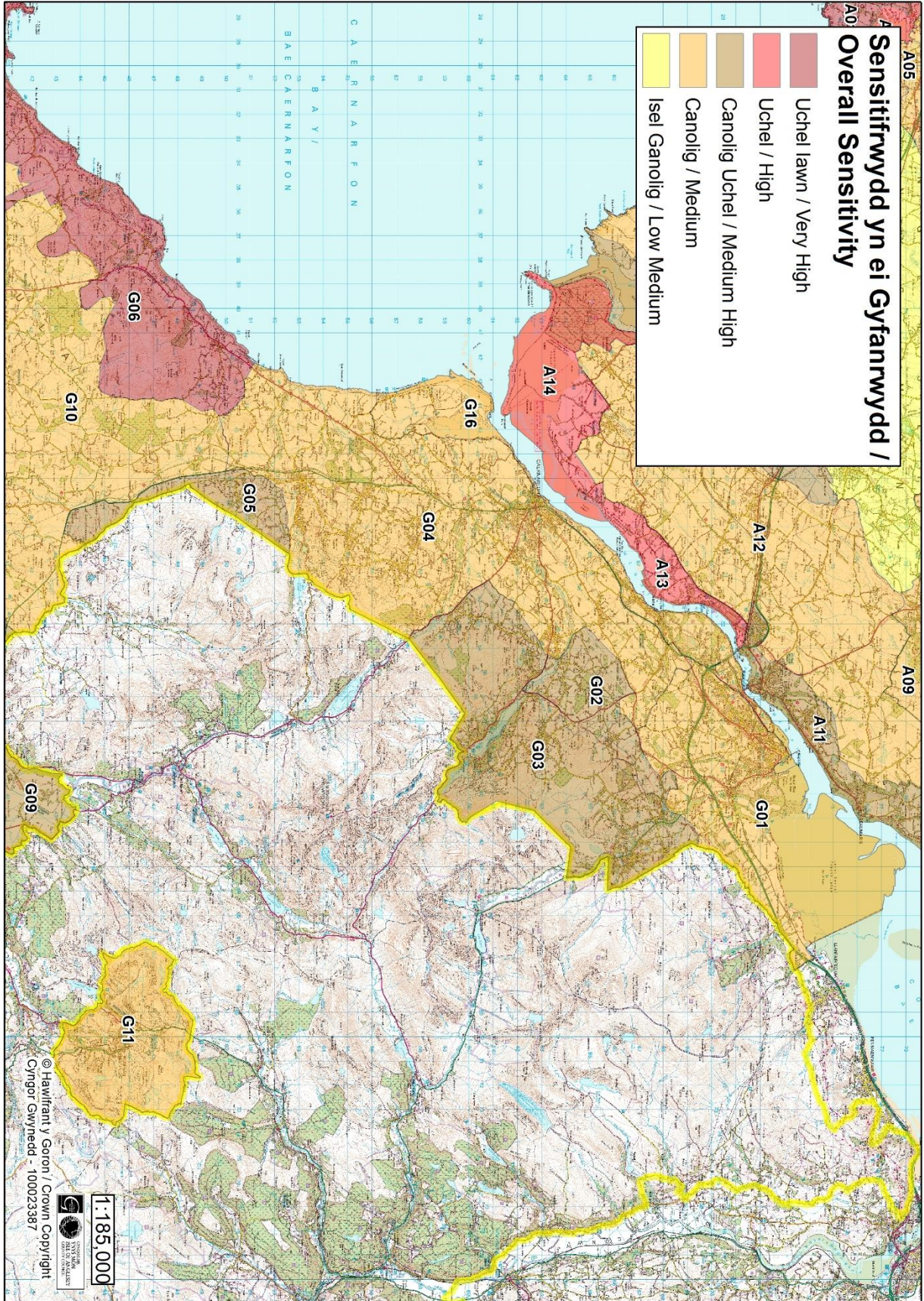
LCA	Indicative Overall Capacity	Sensitivity
	Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	
G12	There is typically no capacity for static caravan/chalet park developments throughout much of this LCA, although there may be limited capacity for very small to small, well designed and sited static caravan/chalet park developments to the south / south east of the LCA.	
G13	Due to the considerable numbers of static caravan/chalet parks, there is typically very limited capacity, if any, for further static caravan/chalet park developments and extensions.	
G14	Typically no capacity for static caravan/chalet park developments (with the exception of very infrequent sensitively sited and well-designed very small developments, which should relate well to the existing built environment/urban).	
G15	Due to the considerable numbers of static caravan/chalet parks, there is typically very limited capacity, if any, for further static caravan/chalet park developments and extensions.	
G16	Within the SLA (and all areas that contribute to its setting and the setting of the National Park, WHS and AONBs), there is typically no capacity for static caravan/chalet park developments. Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	
Anglesey		
A01	Typically no capacity for static caravan/chalet park developments within this LCA.	
A02	Within the AONB, and areas that contribute to its setting, there is typically no capacity for further static caravan/chalet park developments and extensions. Outside the AONB there may be very limited capacity for static caravan/chalet park developments and extensions, typically comprising very infrequent, very small scale well sited developments. In all cases development should avoid the undeveloped coastal edge and its immediate setting and should be clearly separated so that their effects remain local and there is no collective/cumulative defining influence on the landscape.	
A03	Typically no capacity for static caravan/chalet park developments or extensions within this LCA.	
A04	Typically no capacity for further static caravan/chalet park developments or extensions within this LCA.	
A05	Within the AONB and SLA (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments and extensions. Outside the AONB and SLA it is considered there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	

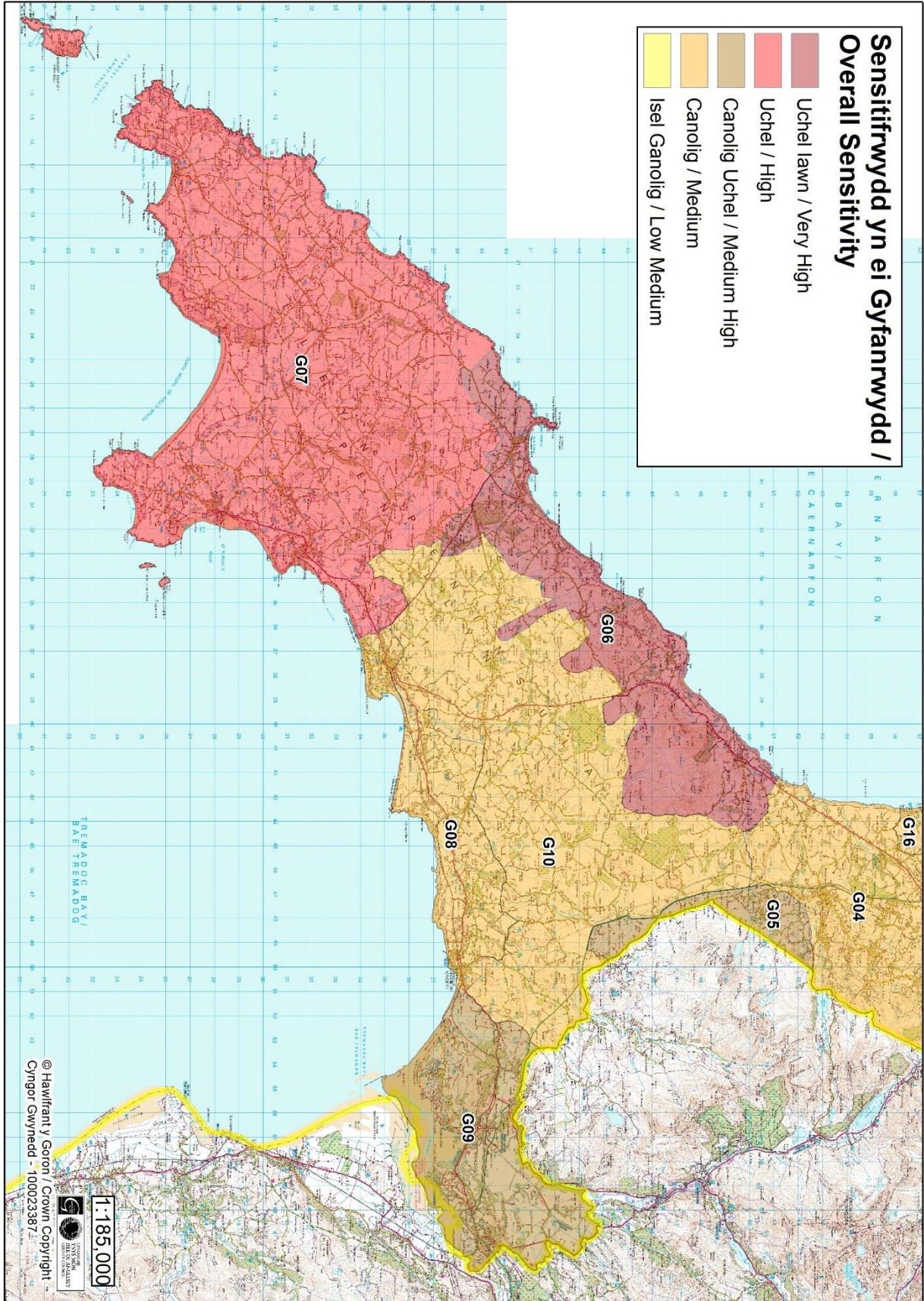
LCA	Indicative Overall Capacity	Sensitivity
A06	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments or extensions.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity for well sited very small to small scale developments.</p>	
A07	<p>Typically no capacity for static caravan/chalet park developments.</p>	
A08	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments or extensions.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity for very small to small scale developments, in particular where these may relate well to the existing built environment/settlements.</p>	
A09	<p>Within the AONB and SLA (and areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments and extensions.</p> <p>Outside the AONB there may be limited capacity for further very small to small well sited static caravan/chalet park developments and extensions.</p> <p>In all cases development should avoid the undeveloped coastal edge and its immediate setting.</p>	
A10	<p>Typically no capacity for static caravan/chalet park developments within this LCA.</p>	
A11	<p>Within the AONB and SLA (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments or extensions.</p> <p>Outside the AONB and SLA it is considered there may be limited capacity for very small to small scale well sited developments.</p>	
A12	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity for sensitively sited very small to small scale developments which should relate well to the existing built environment/urban landcover.</p>	
A13	<p>Typically no capacity for further static caravan/chalet park developments and/or extensions within this LCA.</p>	
A14	<p>Typically no capacity for static caravan/chalet park developments.</p>	
A15	<p>Typically no capacity for static caravan/chalet park developments within this LCA.</p>	
A16	<p>Within the AONB and SLA (and all areas that contribute to their setting), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside the AONB and SLA it is considered there may be limited capacity for very small to small scale developments, which should relate well to the existing built environment/urban landcover.</p>	

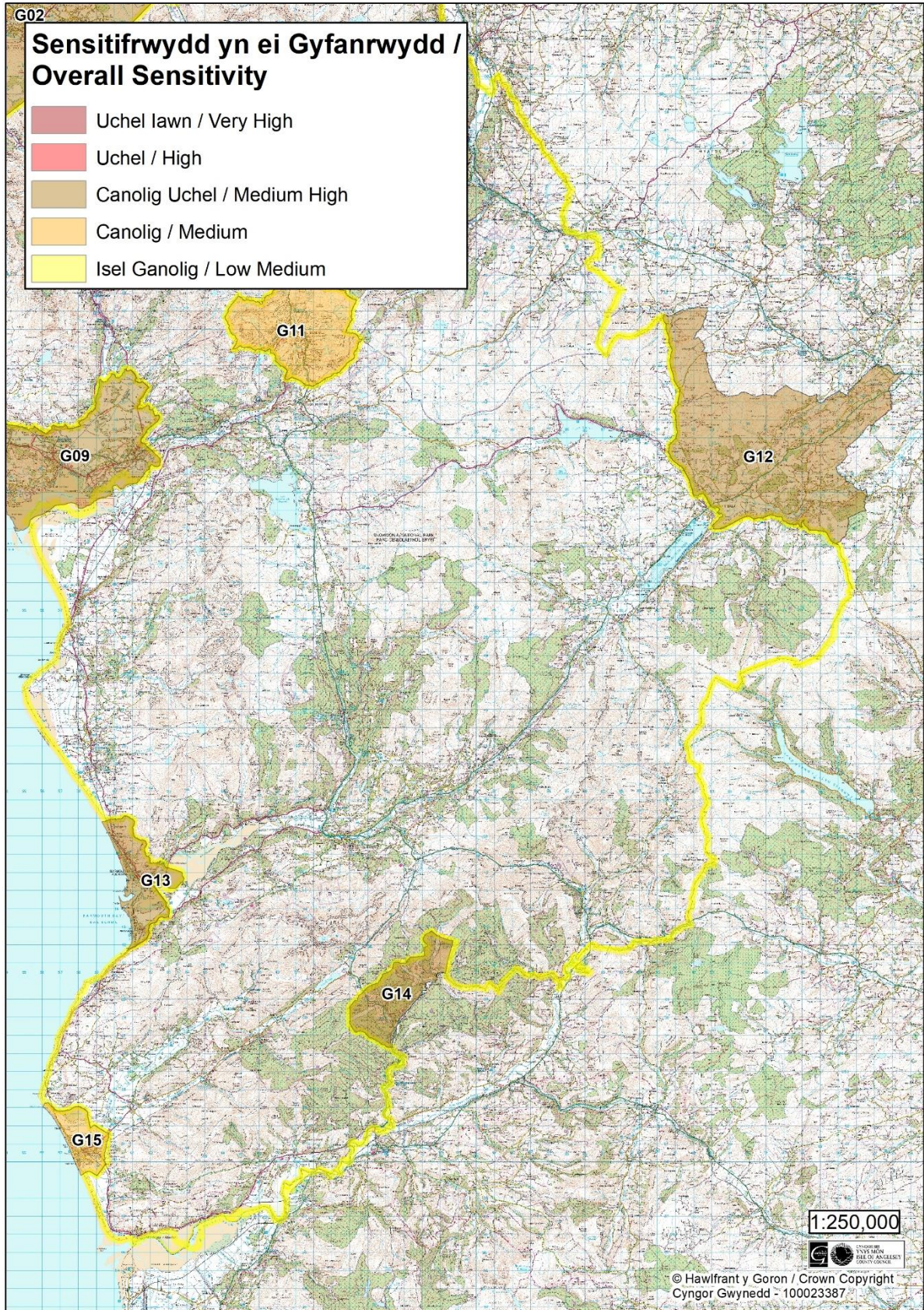
LCA	Indicative Overall Capacity	Sensitivity
A17	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments and extensions.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity for very small to small scale developments, and/or limited capacity for well-designed and sensitively sited larger scale developments, which should, in all cases relate well to the existing built environment/urban landcover.</p>	
A18	<p>Although a lower sensitivity to static caravan/chalet park developments may indicate a higher capacity in this LCA, there may be very limited capacity, if any, for further static caravan/chalet park developments and extensions. This is due to the relatively small size of the LCA together with the amount of modern development which already influences the landscape (including RAF Valley Airfield and several larger scale static caravan/chalet parks).</p>	

FINAL DRAFT









Appendix 4 - Business Plan Template (paragraph 4.6.8)

Authors Name (including relevant qualification) Business Name
1. Business Name Business Contact Details
2. Executive Summary (Suggest that this section is completed after completing other sections of the Business Plan).
3. Introduction and Overview of the Business (Provide a brief description of the business, who’s involved, what do you want to achieve and how will success be measured. Please remember to include a description of the type of accommodation which you will offer and explain if you have a Unique Selling Point (USP)).
4. The market and competitors – what is the current provision? What is the demand?

(Provide an overview of the market which you work within, including an analysis of your competitors, and explain how you will compete with them. Give details relating to your target market, customer needs and your means of satisfying those needs).

5. Sales and marketing strategy

(Explain your marketing strategy and how you're distinctive. Who are your customers? Is the business likely to create local job opportunities and contribute to the local economy? How does your business relate to any local, regional or national tourism strategies? Remember to include your pricing strategy and occupancy projections for the holiday units along with any supporting evidence relating to the marketing strategy).

6. Financial Information

(Information relating to the amount of equity required for the business to become operational should be included, i.e. what is the cost of building/conversion. In this section information should also be provided relating to weekly/monthly profit forecast (including the costing for the day to day running of the business utilities, insurance, wages etc). It will be best practice to include a number of projections, e.g. based upon occupancy rate of

25%, 50%, 75% and 100% and over a period of time (projections for a period of 5 years is suggested or until the business is economically viable).

7. Appendices

(All of the Business Plan supporting documents should be provided. They could include, research into the market, letters of intent or specific orders which relate to the business, references, portfolio of previous businesses, legal documentation and examples of marketing information. Please ensure that the appendices are referenced within the business plan).

Appendix 5 – Coastal Change Management Areas (section 5.4)

PDZ	SMP2 Policy Boundaries			Preferred Policies		
	MAN	PU	Policy Name	Policy Comments	2025	2055
11	22	PU11. 4	Ro Wen coast	This would involve relocation of property owners and businesses from Fairbourne	HTL	MR
		PU11. 5	Ro Wen spit		MR	MR
		PU11. 6	Fairbourne Embankment		HTL	MR
	24	PU11.15	Barmouth North	This may include the relocation of properties	HTL	MR
12	27	PU12.10	Briwet & Dwyrud Gorge	Maintain toll road and railway line	NAI	NAI
		PU12.11	Upper Dwyrud Estuary	Local Management of defences to maintain main roads	MR	NAI
		PU12.12	Penrhyndeudraeth Headland	This might not preclude local private management of defences subject to normal approvals	NAI	NAI
	28	PU12.15	Samson Bay		NAI	NAI
		PU12.16	Morfa Bychan	Sustain natural dune defence with management of access. Develop a long term management plan for adaptation within Holiday Park area and potential future flood risk to village.	MR	MR
	29	PU12.17	Criccieth Shingle Banks	Consideration of potential to realign the railway	HTL	MR
		PU12.19	Castle Headland		NAI	NAI
	30	PU12.21	Y Dryll		NAI	NAI
		PU12.22	Dwyfor	Consider impact on railway	MR	NAI
		PU12.23	Glanllynnau Cliffs	Maintain geological exposure	NAI	NAI
		PU12.24	Afon Wen	Concerns over long term sustainability. Consider possible realignment in land of the railway.	HTL	MR
		PU12.25	Penychain east	This might not preclude local private management of defences subject to normal approvals.	NAI	NAI
13	31	PU13.1	Penychain and western section of the bay		NAI	NAI
		PU13.2	Abererch	Subject to national consideration of railway	HTL	MR
		PU13.7	Golf Course	Detailed study to allow transition between Traeth Crugan and South Beach	HTL	MR
		PU13.8	Traeth Crugan	Intent to create new entrance estuary to the Afon Penrhos and to manage new defence to the core of Pwllheli	HTL	MR
		PU13.9	Llanbedrog	This would not preclude local management of the slipway area.	NAI	NAI
	32	PU13.10	Mynydd Tir Cwmwd		NAI	NAI
		PU13.11	The Warren	Progressive management of the retreating shoreline to maintain the beach	HTL	MR

PDZ	SMP2 Policy Boundaries			Preferred Policies		
	MAN	PU	Policy Name	Policy Comments	2025	2055
		PU13.12	Abersoch	Consider opening up tidal flooding of the Afon Soch and planning of future use of the entrance	HTL	MR
		PU13.14	Borth Fawr Central	Opportunity for adaptation	HTL	MR
		PU13.15	Machroes	This would not preclude local management of the road.	HTL	MR
	33	PU13.16	Machroes headland		NAI	NAI
		PU13.17	St Tudwal's islands		NAI	NAI
		PU13.18	Porth Ceiriad		NAI	NAI
		PU13.19	Cilan Headland		NAI	NAI
14	34	PU14.1	Mynydd Cilan West		NAI	NAI
		PU14.2	Porth Neigwl East	Local readjustment and dune management	NAI	NAI
		PU14.3	Porth Neigwl Centre		NAI	NAI
		PU14.4	Porth Neigwl West	Future realignment or loss of road	NAI	NAI
		PU14.5	Rhiw		NAI	NAI
	35	PU14.6	Ysgo		NAI	NAI
	36	PU14.7	Aberdaron East	Consider how the transition between Aberdaron Village frontage and this unit is managed to allow adaptation.	NAI	NAI
		PU14.8	Aberdaron Village and coastal slope	Develop Managed Realignment within a framework for sustainable development of the village. Address transport issues.	HTL	MR
		PU14.9	Uwchmynydd		NAI	NAI
	37	PU14.10	Ynys Enlli	Consider adaptation to landing stage	NAI	NAI
38	PU14.11	North West Llyn	Local management would not be precluded to allow adaptation of use within a principle of allowing natural evolution of the coast.	NAI	NAI	
15	39	PU15.1	Carreg Ddu to Trwyn y Tal	Overarching policy setting the base intent for the zone.	NAI	NAI
		PU15.2	Porth Dinllaen, including Morfa Nefyn	This would require detailed planning for adaptation at Porth Dinllaen and managed retreat at the access at Morfa Nefyn	HTL	MR
	40	PU15.4	Trwyn y Tal to Trwyn Maen Dylan	Overarching policy setting the base intent for the zone.	NAI	NAI
		PU15.5	Trefor	A detailed local plan would be needed to sustain amenity value of the area.	MR	MR
		PU15.6	Aberdesach	Local management of the shingle bank and river discharge to sustain natural defence of the area.	MR	MR
16	41	PU16.1	Pontllyfni	This would not preclude maintenance of private defence during the first epoch. Review flood risk to main road and sewage works	NAI	NAI
		PU16.2	Pontllyfni to Dinas Dinlle	Maintain sediment supply to the north	NAI	NAI

PDZ	SMP2 Policy Boundaries			Preferred Policies		
	MAN	PU	Policy Name	Policy Comments	2025	2055
		PU16.3	Dinas Dinlle	Manage transition between Dinas Dinlle Head and open coast with the intent to manage flood risk to village on higher ground.	HTL	MR
		PU16.4	Morfa Dinlle	Develop management to self sustaining dune frontage. This would not specifically preclude management of the local area at Fort Belan subject to normal approvals.	MR	MR
		PU16.5	Foryd bay	Manage flood defence initially with the intention of returning the bay to a naturally functioning system.	HTL	MR
		PU16.6	Traeth Abermenai	This would include further examination of potential flood risk to Dwyran, with the intent to provide defence.	NAI	NAI
		PU16.7	Abermenai Spit and Traeth Llanddwyn	Removal of forestry to allow width for coastal adjustment	NAI	NAI
	42	PU16.8	Newborough Forest	Removal of forestry to allow width for coastal adjustment	NAI	NAI
		PU16.10	Bodowen Cliffs		NAI	NAI
	43	PU16.13	Waterloo Port to Glan y Mor -Y Felinheli	This would not preclude local management through private funding subject to normal approvals.	NAI	NAI
		PU16.15	Glan-y-mor Lodge to Bridge		NAI	NAI
		PU16.16	Bridge to Barras		NAI	NAI
		PU16.17	Barras to Mermaid Inn	Intent to maintain access but with future need for adaptation to increased flood risk.	HTL	MR
	44	PU16.18	Llanfair Bay		NAI	NAI
		PU16.20	Pont Cadnant to Gallows point	This would not preclude private works subject to normal approvals.	NAI	NAI
		PU16.23	Drumlin		NAI	NAI
		PU16.25	Llanfaes to Penmon	Potential need to realign road	NAI	NAI
	45	PU16.26	Bridge to Garth		NAI	NAI
		PU16.30	Penrhyn Headland		NAI	NAI
	46	PU16.31	Afon Ogwen to Madryn		NAI	NAI
		PU16.32	Afon Aber	Adapt defences to maintain natural sediment drift with long term intent to protect transport route from potential flooding.	MR	MR
	17	47	PU17.1	Trwyn y Parc Headland		NAI
		PU17.2	Traeth mawr	Maintain natural function of dune system and estuary	NAI	NAI
		PU17.3	Aberffraw	Adapt road and quay to support natural function of the estuary	HTL	MR

PDZ	SMP2 Policy Boundaries			Preferred Policies			
	MAN	PU	Policy Name	Policy Comments	2025	2055	
		PU17.4	Aberffraw cliffs	This might not preclude appropriate management of the road at Porth Trecastell	NAI	NAI	
	48	PU17.5	Porth Nobla to Rhosneigr	This would not preclude management of defences at Cerrig Defaid in the first two epochs.	MR	MR	
		PU17.8	Traeth Crigyll and Traeth Cymyran	Relocation of facilities to RAF Valley	NAI	NAI	
	49	PU17.9	General policy for Southwest	Management to local bays is defined below.	MR	MR	
		PU17.10	Borthwen	This would not preclude local private defence subject to normal approvals	MR	MR	
		PU17.14	Northwest coast		NAI	NAI	
	50	PU17.16	Penrhos Bay	Examination of potential flood risk	MR	MR	
		PU17.17	Penrhos Headland	This would not preclude local private defence subject to normal approvals	NAI	NAI	
	51	PU17.19	General policy for Inland Sea	Local defence to sustain Four Mile Bridge and local defence against flood within hinterland	MR	MR	
	52	PU17.21	Newlands	Co-ordinated approach to slowing erosion	MR	MR	
		PU17.22	Afon Alaw	Long term planning to reduce residual flood risk	MR	MR	
		PU17.23	Traeth Gribin to Trwyn Cliperau	This would not preclude local private defence subject to normal approvals	MR	MR	
	18	53	PU18.1	Twyn Cliperau to Wylfa Head	Overarching policy for whole area, with local policy as set out below	NAI	NAI
			PU18.2	Porth Tywynmawr	Local adaption	NAI	NAI
			PU18.3	Porth Trefadog	Local adaption	MR	NAI
			PU18.4	Porth Trwyn		NAI	NAI
			PU18.5	Porth Swtan		NAI	NAI
			PU18.6	Cemlyn Bay and Headland	Requires a development of a detailed management plan	MR	NAI
54		PU18.8	Cemaes Bay west		NAI	NAI	
		PU18.12	Pig y Barcud Cliffs		NAI	NAI	
55		PU18.13	Trwyn y Parc to Trwyn Cwmryd	Overarching policy for whole area, with local policy as set out below	NAI	NAI	
		PU18.14	Porth Wen Brickworks	Critically examine need for maintain defence to support key historic feature	MR	MR	
		PU18.16	Trwyn Costog	Develop a planning frame to minimise future need for defence	MR	MR	
		PU18.18	Porth Elian	Relocate road and necessary.	HTL	MR	
56		PU19.1	General	Overarching policy for whole area with local policy as set out below.	NAI	NAI	
		PU19.2	Portobello	Local private management subject to normal approvals.	MR	MR	
		PU19.3	Traeth Dulas	Allow natural development of the estuary	NAI	NAI	
57		PU19.4	Porth Lydan	This would quite specially not exclude local works subject to normal approvals	MR	MR	

PDZ	SMP2 Policy Boundaries			Preferred Policies		
	MAN	PU	Policy Name	Policy Comments	2025	2055
		PU19.6	Moelfre to Traeth Bychan		NAI	NAI
		PU19.7	Traeth Bychan Centre	Local management towards allowing natural development of the beach	MR	NAI
		PU19.8	Traeth Bychan South		NAI	NAI
	58	PU19.9	Borth Wen Cliffs		NAI	NAI
		PU19.11	Trwyn Dwlban		NAI	NAI
		PU19.13	Croesfryn		NAI	NAI
		PU19.14	Afon Nodwydd	Development of a local management plan	MR	MR
		PU19.15	Llanddona Beach		NAI	NAI
		PU19.16	Trwyn Penmon Cliffs		NAI	NAI
		PU19.17	Puffin Island		NAI	NAI

Key:

PDZ = Policy Development Zones

MAN = Management Area

PU = Policy Unit

HTL = Hold the Line

NAI = No Active Intervention

MR = Managed Realignment