

PLANNING COMMITTEE	DATE: 21/03/2022
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

Number: 4

Application Number: C22/0078/37/LL

Date Registered: 01/02/2022

Application Type: Full

Community: Llanaelhaearn

Ward: Llanaelhaearn

Proposal: Conversion of building into a Holiday Unit

Location: Uwch Hafoty, Trefor, LL54 5NB

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This is the second submission of a full application to convert and extend a former residential dwelling into a self-contained holiday unit with an associated parking space together with the installation of treatment works. What remains of the structure in its dilapidated and unused state is a rectangular building with extensive sections of the original external stone walls that have deteriorated in terms of condition and form. No roof of any type exists. The existing openings have not been secured and therefore access into the building is unrestricted and some vegetation can be seen within the internal floors of the structure. It appears that some fairly recent re-pointing work has been undertaken on some of the external walls and it can be seen that the structure itself looking from the inside has cracks on the structure's gable ends, and has significantly deteriorated.
- 1.2 The site is located on the steep northern slopes of Yr Eifl approximately 0.8km south west of the village of Trefor. A narrow and winding public road leads up a substantial slope from the village towards a path/track that leads to the site itself, with the public road then diverting and carrying on towards the village of Llanaelhaearn further on to the south east. The track that approaches and passes the site forms part of the Wales Coastal Path while other public footpaths cross the frontage of the existing ruin and another part of the site. The site is located in a prominent and elevated location in open countryside, outside any current development boundaries. The site and its surroundings are located within the Llŷn AONB and the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest. The nearest boundaries of Yr Eifl Site of Special Scientific Interest as well as the boundary of Yr Eifl scheduled monument protected zone is approximately 135m south of the site.
- 1.3 The existing one-storey ruin is simple in its form with traditional stone walls. It is seen that land clearance work has been undertaken near the site including engineering works directly to the rear of the structure and in locations to the side and further down in front of the site. The existing access that acts as an entrance to the site is narrow, steep and overgrown with substantial earth-banks either side of the path.
- 1.4 It is proposed to convert and extend the existing structure by erecting a new roof that entails that the height of the ridge and proposed chimneys would likely to be higher than the original. Internally, there would be a living room/kitchen/ dining room with a bedroom and a separate bathroom. The proposal is to retain the existing openings in this building together with including new standard openings within the roof space at the back.
- 1.5 The site plan does not define the curtilage and it can be seen that a parking and turning space would be provided lower down from the structure while the treatment works equipment would be installed on land north-west of the site.
- 1.6 A structural report has been submitted as part of the application together with a business plan/statement of justification.
- 1.7 The application is submitted to the Committee at the request of the Local Member.

2. Relevant Policies:

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Planning Policy Wales emphasise that planning decisions should be in accordance with the Development Plan, unless material planning considerations indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.
- 2.2 The Well-being of Future Generations (Wales) Act 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the seven well-being goals within the Act. This

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report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

2.3 **Anglesey and Gwynedd Joint Local Development Plan 2011-2026, adopted 31 July 2017**

PCYFF 1: Development Boundaries

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PS 5: Sustainable developments

AMG 1: Areas of Outstanding Natural Beauty Management Plans

AMG 5: Local Biodiversity Conservation

PS 19: Conserving and where appropriate enhancing the natural environment

PS 1: The Welsh Language and Culture

PS 4: Sustainable Transport, Development and Accessibility

TRA 2: Parking standards

TRA 4: Managing transport impacts

CYF 6 - Re-use and adapt rural buildings or a residential unit for business use or construct new units for business/industry.

PS 14: The Visitor Economy

TWR 2: Holiday Accommodation

AT 1: Conservation Areas, World Heritage Sites and Landscapes, Parks and Registered Historic Gardens

PS 20: Preserving and where appropriate enhancing heritage assets

The following are also relevant in this case:

Supplementary Planning Guidance (SPG): Replacement Dwellings and Conversions in the Countryside

SPG: Holiday accommodation

2.4 **National Policies:**

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 11 - February 2021)

Technical Advice Note 12: Design

Technical Advice Note 13: Tourism

Technical Advice Note 18: Transport

Technical Advice Note 23: Economic Development

Technical Advice Note 6: Planning for Sustainable Rural Communities

3. **Relevant Planning History:**

- Application C21/0828/37/LL - Conversion of building into a Holiday Unit together with installation of treatment works - refused 12/10/21
- Application C08D/0270/37/LL – Reinstatement of a former dwelling – refused 12/08/08
Appeal Number APP/Q6810/A/2087410 - appeal against refusal of application C08D/0270/37/LL – the appeal was refused 10/03/09
- Application C05D/0594/37/LL - full application to convert a dwelling into a new residential dwelling and create a new access - refused 08/12/05
- Application 2/17/196 - Full application to convert a ruin into a residential dwelling - refused 18/09/89

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4. Consultations:

Community/Town Council: Support

Transportation Unit: Not received

Natural Resources Wales: No observations

Welsh Water: Standard conditions and advice

Public Protection Unit: Not received

Biodiversity Unit: No survey was submitted with the application and it can be seen from photographs submitted that there are a number of holes and cracks in the walls that may provide roosting sites for birds and bats. It is therefore suggested that an initial roosting assessment is submitted to determine if the work would affect protected species.

Rights of Way Unit: Public footpath number 7 Llanaelhaearn, south of the building will need to be protected during and after the development. Consideration must also be given to the section of the path that crosses the front of the proposed development but has not been noted on the plans.

AONB Unit: Uwch Hafoty is in a prominent location in the landscape above the village of Trefor and is in the AONB. It was a traditional one-storey cottage, however, by now it is a ruin without a roof and with fragile external walls. Substantial re-building work would be required for it to be reinstated as a dwelling unit. The development would reinstate the original character of the cottage and the materials are traditional. It appears that the development accords with policies HP2 and HP3 in the AONB Management Plan and with suitable arrangements to control ancillary developments it is not believed that the development would affect the AONB.

Public Consultation:

A notice was posted on site and nearby residents were informed. The advertising period has expired and no letter / correspondence of objection has been received.

5. Assessment of the material planning considerations:

The principle of the development

5.1 The site is located in open countryside in a remote location on the steep slopes of Yr Eifl. Policy PCYFF1 of the LDP states that outside the development boundaries, proposals will be refused unless they are in accordance with specific policies in the LDP or national planning policies or that the proposal shows that its location in the countryside is essential, while criterion 1 of policy PCYFF 2 notes that the proposal should demonstrate its compliance with all the relevant policies in the plan.

5.2 When considering the suitability of the building for conversion for a specific use, consideration needs to be given to national guidance set out in TAN 23: Economic Development (February 2014). The relevant paragraph in this TAN is 3.2.1, which notes as follows: *"The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for*

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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 of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes on the basis that:

- i. they are suitable for the specific use;
- ii. conversion does not lead to dispersal of activity on such scale as to prejudice town and village vitality;
- iii. their form, bulk and general design are in keeping with their surroundings;
- iv. imposing conditions on a planning permission overcomes any planning objections, for example on environmental or traffic grounds, which would otherwise outweigh the advantage of re-use;
- v. if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction;
- vi. conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.

5.3 In relation to bullet point (v) above, the applicant is expected to satisfy this aspect by submitting a 'structural report' carried out by a competent person, as part of the planning application.

5.4 The SPG: Replacement Dwellings and Conversions in the Countryside, gives further guidance on what is expected from structural reports, namely:

- It must be ensured that the report is drawn up by a qualified person, such as a Structural Engineer (para. 2.5)
- The information submitted should be in the form of a Report. Where appropriate, the use of drawings and photographs are encouraged to show the building's condition (para. 2.5).
- Any Structural Report should be comprehensive and thorough and include information about the condition of the building and its suitability for the proposed use. A Report that is only based on a visual inspection of the building will not be acceptable (para. 2.7).

5.5 In this case, a Structural Report was submitted by a qualified person dealing with a survey of the site and also notes that a test hole was excavated sometime in the past (no specific date); this confirms that the building's foundations are set on shale. The Survey concludes due to the thickness of the existing walls and the fact that the foundations are on rock, the structure of the house is solid and re-roofing and re-pointing the walls, together with reducing land at the rear of the building would make it habitable. It further states that the land level should be reduced to be lower than the existing internal level; if the foundations are not completely on rock, the foundations will have to be underpinned; re-pointing the internal and external walls with local re-building and measures to prevent water internally; install a new granite lintel above the fireplace and re-build above; erect a new roof; insulation and lining of external walls; provide an external toilet; undertake work to the access road.

5.6 Having considered the above assessment, although the Structural Report is of the opinion that it would be possible to convert the existing building into a holiday unit, such a proposal would obviously mean undertaking extensive structural work to the existing structure, that in the opinion of the LPA is a dilapidated and abandoned structure. The results of the Structural Report have not undoubtedly convinced the LPA that the existing structure could be converted into a living unit without firstly undertaking extensive structural work to it. It has to be considered that previous decisions regarding this site, including the appeal, have also noted concern about the work and as a result of the work, it would be tantamount to building a completely new building.

5.7 In relation to the condition, attention is drawn to paragraph 9.1 of the SPG: Replacement Dwellings and Conversions in the Countryside. This notes:

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"Any building in the countryside proposed for conversion should be a permanent building of sound construction. Developments that entail significant re-building work will not be permitted as this would be tantamount to constructing a new building. The walls should be structurally sound and should be eaves level in height. Any building in the countryside that is in such a dilapidated condition where substantial parts of it would have to be replaced or that the building would have to be completely replaced, will not be acceptable. This will ensure that the special character and appearance of the building will not be damaged. As a guide, an application for the conversion of a building should not be considered if it is necessary to rebuild more than 10% of the total wall area when it is necessary to restore the roof, or 20% of the total wall area if there is no need to restore the roof."

- 5.8 In considering the fragile and dilapidated condition of the existing structure (that has in reality been in this state for over 30 years) it is believed that the proposal cannot comply with all the requirements of Policy CYF 6 (that requires the building to be structurally sound) or the relevant advice included in TAN 23 and to this end, therefore, it is believed that the proposal is not acceptable and the existing structure is unsuitable for conversion into a living unit in the form of a holiday unit.
- 5.9 Policy TWR 2 supports the re-use of existing sites for alternative use, provided that the development is of a high quality in terms of design, setting and appearance, and provided that the criteria listed within the Policy can be met. The most relevant criteria in relation to this application are criteria (i) and (ii). They state *"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"* and *"that the proposed development is appropriate in scale considering the site, location and/or settlement in question"*. The definition of previously developed land is very clear as it is stated that it is land where there is, or was, permanent structures. It also states that land where there are remains of any construction or activity that has merged into the landscape over time, will not be included. Therefore, in this case as previously noted, it is not deemed that the site or the dwelling in question is suitable for conversion due to its dilapidated condition that has now merged into the local landscape and as a result the scale of the development would be tantamount to the construction of a new house outside any existing development boundary.
- 5.10 Criterion 'v' of Policy TWR 2 states: *"That the development does not lead to an over-concentration of such accommodation within the area."* When considering this criterion it should be ensured that a Business Plan is submitted as part of the application to include the necessary information in terms of the vision for the proposal and to ensure there is a market for this type of use (paragraph 6.3.67 of the JLDP). In addition, consideration should be given to the existing provision of holiday accommodation within the local area. In this case, a Business Plan has been submitted with the application.
- 5.11 Furthermore, Supplementary Planning Guidance: Tourist Facilities and Accommodation (March 2021) notes that 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. The SPG expands on this matter by noting that favourable consideration should not be given to applications for holiday accommodation where 15% or more of the housing stock are second homes, or where a high percentage of all holiday accommodation are self-serviced units. In accordance with the guidance included in the SPG, as there are 10.37% of second homes in the Llanaelhaearn Community Council area according to the latest combined figures (October 2021), therefore the threshold in terms of the number of second homes has not been reached. Bearing this in mind, it is considered that the proposal is in accordance with this element of the relevant SPG.

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Visual amenities

- 5.12 The site is situated in a prominent location the countryside. The proposal would involve the conversion and extension of the ruin on the site offering a design and finish to convey the likely elevations of the original building. What is left of the original structure has a traditional appearance, with stone walls and the proposal is to erect a new roof in a form and finish that will match. It is characteristic of a large number of vacant and dilapidated ruins throughout the county. Despite fundamental concerns about the proposal, including what it would entail visually through the re-building work that would inevitably be required, the plan itself in terms of design and what is shown is not totally unacceptable as it would respect the traditional appearance of the former cottage that was in use at one time, therefore, in terms of specific consideration it is not believed that it would be unacceptable in terms of the relevant requirements of policy PCYFF 3. If the structure was in a better condition or had been protected and safeguarded for future use, it is likely that there would be more justification for redevelopment, however, the condition of what is here, and has been for many years, is very poor and has deteriorated over time to its existing dilapidated state. This has been confirmed time after time having looked at the planning history including an appeal that sought to reinstate the site for residential use.
- 5.13 It is not believed that the proposal would affect the wider landscape designations including the AONB that is relevant to this area on the grounds of its size and form, therefore it is not considered unacceptable based on the relevant requirements of AMG 1, PS 19, AT 1 and PS 20.

General and residential amenities

- 5.14 The application was advertised on site and nearby residents were notified by letter. The site is located in open countryside on land that is unlikely to affect other residential amenities within the local area. It is not considered that the proposal would be likely to have a significantly harmful impact on neighbouring residents in terms of distances between the site and the nearest dwellings and the nature of the land and therefore it is considered that the proposal is acceptable in terms of the relevant requirements of criterion 7 of policy PCYFF 2.

Transport and access matters

- 5.15 No response had been received from the Council's Transportation Unit at the time of writing. However, having assessed the proposal in terms of its size and parking and access provision, it is not believed that the proposal would be unacceptable in terms of the specific requirements concerning these considerations and therefore it would comply with the relevant policy requirements of policies TRA 2 and TRA 4 of the LDP that deal with these specific matters.

Biodiversity matters

- 5.16 Should the application be acceptable based on all the other matters, it would be customary to ask the applicant to submit an initial survey as required by the Biodiversity Unit to assess the structure for the presence of protected species. However, because of the fundamental objection to the proposal, it would not be reasonable or fair for the applicant to prepare and pay for such a report as this would not be enough to overturn the basic concerns regarding this proposal.

Sustainability matters

- 5.17 Access to the site is gained from an unclassified public road that links the village of Trefor with Llanaelhaearn. Although it is a public road, it is narrow and winding and therefore causes obvious barriers to its users and is not suitable for large vehicles or regular use made by the residents of the

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existing houses that are scattered along the road. A track veers off the public road that leads up steeply towards the site. It is evident that the distance of approximately 0.8km from the village of Trefor and approximately 3km from the village of Llanaelhaearn does not appear to be excessive, however, what needs to be considered is the nature and form of the road from the site towards the nearest villages. For example, there is no pavement for pedestrians and the steep gradient of the road from Trefor is especially difficult. What is a matter of concern in terms of sustainability matters is the need to use vehicles to come and go from the site because of the distances and the lack of facilities such as shops within a reasonable walking distance. It is not believed that it would be practicable at all to use a bicycle to come and go despite what is noted otherwise in the statement of justification submitted with the application. It is not in a convenient location as claimed and therefore it is not believed that it would be attractive to a number of visitors because of the obvious inconvenience in terms of access to and from the site.

- 5.18 Point 12 of Policy PS 5 relates to sustainable travel. However, as already noted, it is not considered that the site in question is sustainable, and it cannot be easily reached through various modes including walking, cycling and public transport, which minimises the need to travel by private transport. Therefore, the application site is in a rural location, of considerable distance to the nearest village with shops and services. As a result of the proposed development's rural location along with the restricted and steep nature of the local highways network, holiday visitors would be likely to use their own transport to travel to the site. Any users who wish to use the nearest bus stop in Trefor would firstly have to walk down the steep hill and then wait for a bus, before travelling to their destination and would then have to face a steep hill upwards on the way back. Therefore, it is very likely that users of the units would use private transport to travel each day. Due to the distances and the country roads, only some journeys would be likely to be made on foot or by bicycle. Therefore, by failing to reduce the need to travel with private transportation, the proposal fails to meet the requirements of Policy PS 5 and the requirements of Planning Policy Wales which promote sustainable developments. It is therefore considered that the proposal is contrary to criterion 12 of Policy PS 5 as the proposal would not reduce the need to travel by private transport.

Paragraph 6.3.1 of the SPG: Maintaining and Creating Distinctive and Sustainable Communities, specifically refers to highway considerations and notes:

"It is important that new sites are located as near as possible to the main highways network (i.e. class A and B). Unclassified country roads are usually single-track lanes and are considered unsuitable for heavy traffic. No proposal will be supported when the Authority is of the view that it has not been located close to the main highway network. In addition to this, the boundaries of these roads mainly consist of man-made natural features (e.g. stone walls, cloddiau, hedges) which are important to the visual character of rural areas. In order to provide suitable access from new sites to these roads this could involve getting rid of important landscape features.

While further guidance in the SPG states:

Sustainable developments reduce the need for travel by locating them close to essential facilities and services. Locating developments in places that are close to footpaths, cycle paths and public transport reduces the need for travelling in a private vehicle.

- 5.19 Although proposals that require the use of private vehicles are not prohibited by the LDP, Policy PS 5 promotes the application of sustainable development principles in all new developments, including reference to the most appropriate locations, and reducing the need to travel by private transport.
- 5.20 It should be borne in mind that visitors to the site would not have experience of using this specific road and possibly the rural network of roads as are found here. If this location was served by a road of a higher standard, it is likely that there would be less concern, but due to the nature and appearance of sections of the existing road, it is not believed that the site is suitable.

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5.21 As the application site is in open countryside, away from local infrastructure and access to facilities/services, and the dependency on private transport, it is not considered that the site is in a sustainable location as referred to in criterion 4 of policy PS 14, and point 12 of policy PS 5 and therefore as a result it would not comply.

Relevant Planning History

5.22 In this case and as noted previously, it can be seen from the planning history for a period of over 30 years that previous planning applications to convert or re-use the ruin had consistently been refused. Indeed, the first example dates back to over 32 years ago. It can also be seen that an appeal was submitted to the decision to refuse the application back in 2008. The information in this appeal notes that the residential use was abandoned in the 1960s with the roof of the structure having fallen in around 1977. The planning inspector noted at the time in the report that the proposal was not one for the reinstatement of a former dwelling, but was one of rebuilding on the remains of a derelict building to form a new dwelling. Briefly, he also noted:

- that the structure had been exposed to the elements for a lengthy period
- in a poor condition and therefore substantial rebuilding work was required
- the building was a relic of a long-departed way of life on a remote hillside
- the proposal would be tantamount to the construction of a new dwelling in the countryside

5.23 The report concludes by saying *"In view of the condition of the building, its isolation on a steep hillside away from the village of Trefor and poor road access, I consider that the site would not be suitable for any form of housing development"*.

5.24 It is not believed that the situation has changed at all since this decision, and what is noted in the four bullet points continue to be totally relevant in terms of this situation today.

5.25 Therefore, bearing in mind that the planning history including the appeal decision has consistently stated over an extensive period that re-using this ruin would not be acceptable, it is therefore evident that the site is unsuitable for development. If concerns were highlighted in an appeal made nearly 13 years ago about the condition of the structure left, it stands to reason that the condition has not changed and certainly it has not improved over the last few years and the likelihood is that it has deteriorated even more. The previous applications and this appeal decision have stated clearly that this site is not suitable for residential use and therefore it is not believed that there is any justification to consider that the current proposal is acceptable.

Linguistic matters

5.26 In this case, it is not believed that the proposal meets with the threshold requirements of PS 1 in terms of the need to submit a Welsh Language Statement, specifically considering the scale and type of the proposed development, the proposal would not be relevant to the categories as defined by criteria 1a, 1b and 1c, and therefore a statement will not be required based on these requirements within Policy PS 1. Due to the type and size of the proposal there is no need for a Language Assessment under criterion (2) of Policy PS 1.

5.27 However, consideration should be given to the Welsh language in accordance with the arrangements for screening applications within Appendix 5 of 'Maintaining and Creating Distinctive and Sustainable Communities SPG'. Given the guidance as outlined in the SPG, and based on a full assessment of the relevant requirements, it is not believed that the scale of the proposal is contrary to the specific categories as outlined within the SPG screening system. However, information has been submitted in the statement of justification that notes how consideration was given to language matters and therefore it is considered that the proposal is acceptable in terms of the requirements of PS 1.

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6. Conclusions:

6.1 It is a requirement for the LPA to assess the application against current policies, and on the basis of the above assessment, it does not as a whole conform. Also, in this case, it can be seen that there has been a planning history for many years and has consistently refused the re-development of this site. The appeal decision gives a basis and an undisputed opinion about the suitability of the site and the condition of the structure for re-use and reinstating the structure is tantamount to erecting a new house in the countryside. Therefore, having considered the above and all the relevant planning matters including local and national policies and guidance, as well as the observations received and the relevant planning history including the appeal decision to refuse the previous application, it is believed that this proposal is unacceptable as it fails to satisfy the requirements of the relevant policies as noted above.

7. Recommendation: To refuse

7.1 To delegate powers to the Senior Planning Manager to refuse the application:

1. It is considered that the proposal is contrary to the requirements of criteria 2(i) and (ii) of Policy TWR 2 as well as criterion 3(i) of Policy CYF 6 of the Anglesey and Gwynedd Joint Local Development Plan 2017 and to the advice included in Supplementary Planning Guidance: Replacement Dwellings and Conversions in the Countryside and Technical Advice Note 23: Economic Development due to the fragile and dilapidated condition of the existing structure.
2. The proposal involves the creation of new holiday accommodation in open countryside away from the main road network. It is not considered that the proposal makes use of a suitable site in the countryside as it is an unsustainable site where the majority of the visitors would be dependent on private vehicle use. The proposal, therefore, does not comply with the relevant requirements of policies PS 14 and PS 5 of the Anglesey and Gwynedd Joint Local Development Plan, 2017, along with the advice contained in Supplementary Planning Guidance: Tourist Facilities and Accommodation and Maintaining and Creating Distinctive and Sustainable Communities, Technical Advice Note 18: Transportation and Planning Policy Wales, Edition 11, 2021.