TOURISM FACILITIES AND ACCOMMODATION SUPPLEMENTARY PLANNING GUIDANCE

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

CYNGOR GWYNEDD COUNCIL

CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL

MARCH 2021

Contents

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 form 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	Support the proposed changes unanimously. 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. 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.	RECOMMENDATION – Accept the supporting comment.
2.	Objection	Bourne Leisure	4.6.1-4.6.6	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.	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. RECOMMENDATION – No change

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				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) "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). **This type of accommodation does not include self-catering units located within Holiday parks or complexes…."** To ensure clarity, we also recommend the following addition to draft paragraph 4.6.6 (rewording underlined and in bold): • **A proposal located within an existing holiday park or complex".**	
3.	Objection	Cadnant Planning Ltd.	4.6.1	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.	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. RECOMMENDATION – Amend the paragraph wording as follows:- "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."
4.	Objection	Cadnant Planning Ltd.	4.6.2	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	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

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				purposes but are not controlled for that purpose by way of a condition. 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. This should be clarified in the SPG.	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. RECOMMENDATION – No change
5.	Objection	Cadnant Planning Ltd.	4.6.5	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. 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.	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). RECOMMENDATION – No change
6.	Objection	Cadnant Planning Ltd.	4.6.5	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.	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. 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.

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					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 '*Housing: An Effective Way to Sustain our Rural Communities*' which states '*the percentage of holiday homes should not be more than 20 per cent as this appears to affect the sustainability of any village*.' The second report, '*The Cumbria Housing Strategy 2006/2011*' 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. 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. The figure of 15% as included in the SPG is therefore considered to be fully justified and reasonably. <u>RECOMMENDATION</u> – No change
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>RECCOMMENDATION</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?	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. Further, it is noted that land where there was agricultural use is excluded from the definition of from previously developed land (Planning Policy Wales). RECOMMENDATION – No change
9.	Objection	Cadnant Planning Ltd.	4.6.6	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. 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.	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. RECOMMENDATION – No change
10.	Support	Cyngor Cymuned Llaneilian	4.6	Support the amendment to section 4.6.	RECOMMENDATION – 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
				homes 'within the Community/Town/City council area' exceeds 15%. 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.	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. RECOMMENDATION – Amend the SPG as follows:- "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."** Last bullet point of paragraph 4.6.5:-

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					• 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."**
12.	Obection	Rod Bulmer	4.6.5 (bullet point 6)	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. 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.	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. 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.

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				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: - 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 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. 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:- 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.	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. 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 '*Housing: An Effective Way to Sustain our Rural Communities*' which states '*the percentage of holiday homes should not be more than 20 per cent as this appears to affect the sustainability of any village*.' The second report, '*The Cumbria Housing Strategy 2006/2011*' 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. 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.

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. RECOMMENDATION – 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.	RECOMMENDATION – Accept the supporting comment.
14.	Support	Cyngor Cymuned Llanengan	6.21	Support the change.	RECOMMENDATION – 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. RECOMMENDATION – No change

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
			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. Facing a "gridlock" when trying to visit our beaches is likely to deter visitors from re-visiting. 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".	the SPG that was the subject of the consultation period. RECOMMENDATION – No change
Objection	Bourne Leisure	1.1.7	The Status of Supplementary Planning Guidance Draft paragraph 1.1.7 states:- “This document should, therefore, be given substantial weight as a material planning consideration” Chapter 9 of the Development Plans Manual (edition 3) (DPM) states:- “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.” 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. 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	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
			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. Bourne Leisure suggests that draft paragraph 1.1.7. is reworded as follows (rewording underlined and in bold): "This document should, therefore, be given ~~substantial~~ weight as a material planning consideration"	
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.	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change
Objection	Cadnant Planning Ltd.	3.3.2	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. 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.	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change
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."	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change

Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
Objection	Cadnant Planning Ltd.	4.6.8 (Business Plan)	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. If business plans prepared by a business person is acceptable by banks and lenders, the LPA should not be so prescriptive. 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.	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change
Objection	Cadnant Planning Ltd.	5.5.1 (Definition of a chalet)	This should reflect the definition provided in the adopted JLDP.	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change
Objection	Cadnant Planning Ltd.	6.6.1	"Where possible, measures should be taken to restore the site to its original state when not in use / during the closed season." 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.	Not a valid comment. The comment does not specifically relate to a part of the SPG that was the subject of the consultation period. RECOMMENDATION – No change

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.	**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. **Recommendation** No changes required to the SPG in light of this comment
2	Objection	Bourne Leisure Ltd c/o Lichfields	4.6.2	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. 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: *"Criteria which help define overconcentration of holiday accommodation <u>within defined settlements</u> include…."* A suitable paragraph could also be provided to explain the approach sought. This would make it	**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. **Recommendation** No changes required to the SPG in light of this comment

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.**
4	Objection	Cadnant Planning	4.6.2	The fourth point "*Lack of community facilities and services as local businesses cater for the needs of visitors more that the needs of local residents*." 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.	**Not Accepted** The proposed criteria in section 4.6.2 lists a set 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. **Recommendation** No changes required to the SPG in light of this comment
5	Objection	Llanystumdwy Community Council	4.6.2	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 exists 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. The Planning Service should not take the word of agencies and lettings companies into account when supporting business plans that are submitted as part	**Not Accepted** The proposed criteria in section 4.6.2 lists a set 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. Business plans are useful tools to demonstrate the robustness (or not) of any proposed holiday accommodation development which enables the

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
				of a planning application. Permitting these applications is of interest to these companies. 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. Consideration must be given to the number of Air BnB properties.	Councils to assess whether the scheme has a realistic chance of being viable. 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: 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. 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 **Recommendation** No changes required to the SPG in light of this comment
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
				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. 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. 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?	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. 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. 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. 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.

Rep Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
					Recommendation No changes required to the SPG in light of this comment.
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.	**Not Accepted** Comments noted however the Local Planning Authority has no control over the intent of hoteliers. **Recommendation** No changes required to the SPG in light of this comment.