



Complete Agenda

Democracy Services
Council Offices
CAERNARFON
Gwynedd
LL55 1SH

Meeting

COMMUNITIES SCRUTINY COMMITTEE

Date and Time

10.30 am, THURSDAY, 25TH FEBRUARY, 2021

Location

Cyfarfod Rhithiol / Virtual Meeting

Contact Point

Natalie Lloyd Jones

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(DISTRIBUTED 17/02/21)

COMMUNITIES SCRUTINY COMMITTEE

MEMBERSHIP (18)

Plaid Cymru (10)

Councillors

Elwyn Edwards
Linda Morgan

Annwen Hughes
Edgar Wyn Owen
Simon Glyn

Aled Wyn Jones
Gethin Glyn Williams
Berwyn Parry Jones

Dafydd Owen

Independent (5)

Councillors

Kevin Morris Jones
Elwyn Jones
Angela Russell

Mike Stevens
Elfed Powell Roberts

Llais Gwynedd (2)

Councillors

Robert Glyn Daniels

Owain Williams

Individual Member (1)

Councillor
Stephen W. Churchman

Ex-officio Members

Chair and Vice-Chair of the Council

Other Invited Members

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 ITEMS

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

4. MINUTES

4 - 9

The Chairman shall propose that the minutes of the meeting of this Committee, held on 10th December, 2020 be signed as a true record.

5. RIGHTS OF WAY IMPROVEMENT PLAN REVIEW

10 - 86

CABINET MEMBER: Councillor Gareth W Griffith

To consider the report.

6. SUPPLEMENTARY PLANNING GUIDANCE: TOURIST FACILITIES AND ACCOMMODATION

87 - 167

CABINET MEMBER: Councillor Gareth W Griffith

To consider the report.

7. PUBLIC PROTECTION SERVICES: WORK DURING THE PANDEMIC

168 - 174

CABINET MEMBER: Councillor Gareth W Griffith.

To consider the report.

Communities Scrutiny Committee 10 December 2020

Attendance:

COUNCILLORS: Stephen Churchman, Glyn Daniels, Elwyn Edwards, Simon Glyn, Annwen Hughes, Aled Wyn Jones, Berwyn Parry Jones, Elwyn Jones, Kevin Morris Jones, Dafydd Owen, Edgar Wyn Owen, Elfed Roberts (Chair), Angela Russell, Mike Stevens, Gethin Glyn Williams, Gruffydd Williams and Owain Williams

Officers present:

Bethan Adams (Scrutiny Advisor), Lowri Haf Evans and Natalie Jones (Democracy Services Officers).

Present for item 5:

Dilwyn Williams (Chief Executive / Member of the Gwynedd and Anglesey Public Services Board) and Nonn Hughes (Manager of the Gwynedd and Anglesey Public Services Board)

Present for item 6:

Councillor Gareth Griffith (Cabinet Member for the Environment), Dafydd Wyn Williams (Head of Environment Department), Ceri Hughes Thomas (Parking and Street Works Manager) and Dafydd Edwards (Head of Finance Department)

Present for item 7:

Councillor Gareth Griffith (Cabinet Member for the Environment), Councillor Craig ab Iago (Cabinet Member for Housing and Property), Gareth Jones (Environment Assistant Head), Heledd Jones (Team Leader – Joint Planning Policy Unit – Gwynedd and Anglesey) and Dafydd Edwards (Head of Finance Department)

1. APOLOGIES

Apologies were received from Councillor Linda Morgan

2. DECLARATION OF PERSONAL INTEREST

Councillors Aled W Jones, Annwen Hughes, Kevin M Jones, Angela Russell, Gethin G Williams and Elwyn Jones in item 7 on the agenda as they owned or were a relation to someone close who owned holiday accommodation

The members were of the opinion that they were prejudicial interests, and they withdrew from the meeting during the discussions on the item.

3. URGENT ITEMS

None to note.

4. MINUTES

The Chair signed the minutes of the previous meeting of this committee held on 22 October 2020, as a true record.

5. Governance Structure and Delivery Arrangements of the Gwynedd and Anglesey Public Services Board

A report was submitted outlining the governance arrangements of the Public Services Board (PSB). The contents of the report were expanded upon and a brief update was provided on the developments within the priority fields along with the work of the sub-groups responsible for those fields. Since March 2020, in light of the covid-19 pandemic, it was explained that public bodies had had to adjust to respond to the health crisis by changing their way of working and communicating with others. Reference was made to a workshop held in September 2020 to discuss the Board's role in the recovery of communities from the pandemic.

As a result of the workshop's findings the work streams of the existing sub-groups were revised together with their work programmes, and milestones were agreed. It was also agreed to undertake further research in some areas (financial poverty and youth unemployment) to ascertain the latest situation. The findings of this research would be presented to the Public Services Board on 16 December 2020.

Another finding of the workshop was that a number of the partners responded to the wellbeing needs of our communities as individual organisations. It was explained that the PSB noted that they wanted to avoid work duplication, and they were investigating how they could operate without duplicating the work undertaken by individual partners in order to add value to the current plans. One way to avoid work duplication was that the Board from time to time invites other partners to give presentations on their work such as the Skills Partnership and the Community Safety Partnership.

Members expressed their thanks for the report.

During the discussion, the following observations were made by Members:-

- If the Board's work was to be scrutinised then information was needed regarding measures, targets, data, successes
- Why were the Police not part of the Board?
- There was a lack of houses available to buy locally
- The countryside was suffering with services moving or closing down in communities
- The ethos of Housing Associations was to buy local housing rather than build housing for local people – it was necessary to focus on the element of re-building to protect the Welsh language and to ensure that any funding received e.g. Council Tax Premium for second homes would be invested in those areas that suffer from the impact

In response to an observation that the Welsh Government had not anticipated the need to contribute to the costs of coastal maintenance in response to the increase in use / visitors as a result of the pandemic, it was suggested that the Government's mindset needed to adapt to understand that some coastal issues were beyond Local Authority strategies. It was highlighted that Gwynedd had already had to deal with additional costs to maintain infrastructure due to the increase in use.

It was added that the Future Generations Commissioner noted that public bodies had to focus on how their decisions would have a long-term impact, working together to prevent problems from happening and to recognise that no individual public body can respond to the major challenges. The need to discuss the visitors' structure was agreed and it was noted that a working group had been established to look at the current lack of provision together with trying to find a system for sustainable tourism.

In response to a comment about getting Gwynedd Council to lead on housing matters rather than the Chief Executive of a Commercial Housing Company, it was noted that Gwynedd Council's Housing and Property Department would present a Housing Action Plan to the Cabinet on 15 December outlining suitable plans to deliver the Council's vision to secure suitable housing for the County's residents. The Housing and Property Department will collaborate with Housing Associations to complete specific plans to push the plan forward. It was added that the work of the Housing Sub-group was to establish an innovative programme to build new, affordable housing in the County e.g. building low carbon housing, or 'pre-constructed housing' in Wales. It was emphasised that the Sub-group's work was to look at new opportunities or construction methods with the Gwynedd Housing Strategy and the Gwynedd Housing Action Plan firmly in the hands of Gwynedd Council.

In response to a comment that there was no poverty sub-group, although it had been identified as a priority area, it was noted that the Public Services Board wished to look at poverty but work duplication was a concern. It was added that the intention was to seek arrangements to identify where the gaps were and to maximise what can be done to tackle poverty. Members were reminded that further research was being conducted to ascertain the latest situation and to submit a report to the Board on 16 December 2020.

RESOLVED

To accept the report and to note the observations.

6. Update – Parking Review

The Head of Environment Department presented a report giving an overview of its contents. The main purpose of the report was noted namely that the current strategy, adopted in 2015, would end in 2021. The committee was reminded that a Parking Task Group had been established to consider the need to increase income, along with the new challenges and opportunities that have arisen since the last parking strategy was established in February 2015.

It was reported that the task group had two main challenges namely to increase income to the target of £400,000 and secondly to achieve this without having an excessive impact on Gwynedd residents. It was explained that there had been several changes in parking practices over the last few years and these included;

- More tourists and as a result a greater demand for parking spaces.
- More electric cars were being bought and therefore there was an opportunity to install car charging points.
- Increased use of contactless payments, this highlighted the need to upgrade the pay machines in the car parks.
- An increase in motorhomes parking in inappropriate places.

The above points were expanded upon and the need was noted to offer a provision for card payments side by side with cash payments. It was noted that a provision for payment over the telephone had been established, however, this depended on a mobile phone and a sufficient signal to make the payments. However, it appeared that offering two options would facilitate raising more future income as it was possible for people without cash to use the car parks.

The concerns that had recently been highlighted were identified regarding motorhomes and their increase as restrictions had prevented foreign travel. It was explained that this was not an easy matter to resolve and the problem had existed for some years by now. It was noted that solutions such as, creating by-laws, increasing the number of enforcement officers and also adapting car parks to facilitate motorhome vehicles by

charging acceptable fees for the service.

Reference was made to the parking task group's recommendation to raise fees by 10% in the car parks as a way of increasing income. It was added that the task group had identified that fees should not be charged for parking for the disabled in disabled bays and therefore this would continue free of charge.

During the discussion, the following observations were made by members:-

- Concern was expressed regarding motorhomes parking in places without facilities and in areas of scientific interest and of Outstanding Natural Beauty (AONB). It was noted that there was evidence of users disposing of sewage waste in public places.
- The suggestion was made that we should press for the creation of by-laws to protect staying places in order that motorhomes do not park there.
- It was noted that local caravan businesses needed support and therefore the Council should not invest in offering services for these vehicles in car parks.
- Some members felt that the annual pass of £140 was high for some to pay as one sum, as it was not possible to pay in monthly instalments, however, it was welcomed that it was possible to buy a 6 months pass for half the cost.
- Some members noted that motorhomes were a valuable resource as they were self-contained now and included water supplies and waste facilities. It was suggested that a fee should be charged that was comparative to campsites for people to have an opportunity to park in towns and use shops and local services.
- Concerns were raised regarding parking in some villages, with the increase in holiday homes e.g. Airbnb, where parking spaces were occupied by tourists.

In response to the members' observations, the Head of the Environment Department agreed that the situation with motorhomes had been a concern for a while, however, he noted that it was a long process to create by-laws to prevent these vehicles from parking. It was noted that it was an idea to conduct a political conversation on the next steps.

In reference to the annual pass, it was noted that the possibility of paying monthly was impractical as it was not possible to ensure that payments continued once a pass had been issued to the residents. It was highlighted that it was possible to buy a 6 month pass in an effort to reduce the cost in a different way.

The Parking and Street Works Manager explained the parking fees structures and noted that the parking enforcement team was self-funding with income from fees and fines. As the income had been higher than the costs of employing the team, it may be shown that there was a possibility to increase the size of the team, which was essential to cope with the parking challenges. As well as this, he noted that the surplus could be used to re-invest to improve car parks and to upgrade the machines.

RESOLVED

To accept the update and support the recommendation of the Task Group that pay and display fees be increased by 10%.

7. RESEARCH PAPER: MANAGING THE USE OF DWELLINGS AS HOLIDAY HOMES

The research commissioned by the Cabinet in July 2019 was presented on how to try and address how we could restrict the number of houses that can be used for holiday purposes by looking at measures implemented in other places, and how the planning legislation could be changed in order to implement these in Wales. A request was made for the Committee's observations on the work prior to reporting to the Cabinet on 15

December 2020.

Attention was drawn to the definition of 'holiday homes' for the purpose of the work, as;

- Short-term let holiday units: A residential house (C3 use class) that is not regularly occupied and is let periodically for holiday use on a commercial basis.
- Second homes: A residential house (C3 use class) that is used occasionally by its owner (but not as a main residence) in addition to other visitors for holiday use.

A detailed and meaningful presentation was given to the work and the six recommendations were discussed. It was noted that the recommendations gave options in terms of the possible mechanism that could be implemented in order to have control and reduce the impact of holiday accommodation on communities. It was explained that some recommendations would be discussed jointly and were matters for the Welsh Government to implement, while it was possible to implement others at a local level e.g. implement local planning policies effectively – further consideration may be given to this recommendation in the short term and when reviewing the Joint Local Development Plan.

Members expressed their thanks for the report.

The Cabinet Member for the Environment expressed his disappointment that Cardiff City was the only other Authority that had contributed to the research, however, other counties had shown an interest since the report had been released publicly. He added that one County had already presented notices of motion before their Council. He accepted that the Council faced a challenge as the Government did not have much interest in the current situation, but with an operational document supported by evidence it would be possible to act and respond to the challenge.

The Head of Housing and Property congratulated the team for their work and added that the evidence gathered would put an end to the Welsh Government's excuses for not taking action. Having considered the Housing Premium, Gwynedd Housing Action Plan together with the research, it was highlighted that there was specific evidence to set a direction to control the use.

The Cabinet Member for Housing and Property added that the research paper presented facts that were now a tool to challenge the Welsh Government – the use must be controlled.

During the discussion, the following observations were made by Members:-

- The report was welcomed – it was a good foundation to begin lobbying and was a golden opportunity to change the system and to take responsibility and control of the situation.
- The report addressed matters such as AirBnB, however, not enough was being made to change the Planning Act by setting thresholds for control – it was necessary to persuade the Welsh Government to change the Act.
- The statistics were alarming
- It was necessary to act and challenge the Government to make a difference
- More details regarding employment were required as well as the high house prices in some areas – this would highlight how the Welsh language was losing its foothold – the Welsh language strongholds were losing their Welsh character.
- There was a need to close the loopholes so that old regulatory arrangements could not be avoided – 'short let holiday units' could be targeted – the owner was likely to transfer back to the 'second home' category as a way of avoiding control
- There was a suggestion to adopt 'intervention' – creating two tiers *holiday* and *local* that will protect the local housing stock and drive prices
- Need to consider Land Transaction Tax – an opportunity to increase the premium

- Matters outside the planning field that can be implemented e.g. tourist tax
- Control was required over 'second homes' – there were no opportunities or homes available for young people
- Control was needed over house letting and AirBnB – to ensure standards for letting and tidiness
- Need to restrict the numbers of holiday homes

In response to a comment regarding seeking control over holiday homes and the side effects that stem from this, the Assistant Head of the Environment noted that the brief was limited to looking at the use of open market housing as holiday homes / second homes. He added that the work included detailed and factual information (submitted by a number of departments) that presented valuable local and national evidence. He highlighted that there were no easy solutions and referred to work undertaken in Scotland as a good example that had proven that it was possible to control short-term holiday use by changing planning legislation and licensing. He noted that some of the recommendations needed to be implemented jointly at a national level, while others were local matters where evidence could be used to adapt local policies. He accepted that the Land Transaction Act was also a tool that may be used.

In response to a comment regarding the Tourist Tax and the fact that it had not been included as a recommendation for the Cabinet to consider, it was highlighted that this work was led by the Economic Development Department and therefore had not been included as one of the main recommendations.

In response to a comment that 'second homes' should be considered within a compulsory licensing scheme, it was noted that this would be extremely difficult to control via the planning system compared to 'holiday accommodation' which was commercial use and people coming and going where it could be demonstrated that there was change of use. As the control of second homes was difficult, since it was not possible to prove change of use, it was noted that the recommendation in terms of planning and licensing legislation followed the control of short-term holiday accommodation and sought to get an accurate picture of the situation at ground level and at the expense of this, in the future it would be possible to consider controlling this via local planning policies.

In response to the comment that the control of second homes was difficult, it was suggested that a challenge should be given to the Cabinet to consider setting a different category. Once the category was included it would be possible to control this.

RESOLVED

- **To accept the contents of the report.**
- **To thank officers for presenting evidence and detailed and useful information which may be used to try to convince Welsh Government to change its planning policies.**

The meeting commenced at 10.30am and concluded at 2.15pm.

Agenda Item 5

COMMITTEE	COMMUNITIES SCRUTINY COMMITTEE
DATE	25 February 2021
TITLE	SUBMISSION OF THE DRAFT RIGHTS OF WAY IMPROVEMENT PLAN (ROWIP)
CABINET MEMBER	Councillor Gareth W Griffith
AUTHOR	Dafydd Williams, Head of Environment Department
PURPOSE	To receive feedback and observations from the Scrutiny Committee on a draft version of the Rights of Way Improvement Plan and to approve its use for public consultation.

1. BACKGROUND

- 1.1 The Rights of Way Improvement Plan (RoWIP) is a strategic document to be used by Local Authorities in order to plan for the management, development and promotion of their rights of way network. Gwynedd's original RoWIP was prepared between 2004 and 2007, and was adopted by the Council and published in October 2007.
- 1.2 The Welsh Government has instructed Local Authorities to review their RoWIP and have set a timetable to prepare the review. In Gwynedd's case, the process of preparing the review should have been completed early in 2019. Gwynedd and several other Authorities have not been able to complete the process within the set timetable. The delay was as a result of work pressure within the Countryside Service including the emphasis placed on the Ffordd Gwynedd review.
- 1.3 It was intended to bring the Draft RoWIP to this Committee on the 2nd of April 2020, this was not possible due to Covid restrictions.

2. NEXT STEPS

- 2.1 A draft version of the RoWIP is enclosed, the document's structure corresponds to Government guidance and in several ways, it is similar to the original RoWIP available on the Council's website.

<https://www.gwynedd.llyw.cymru/cy/Cyngor/Strategaethau-a-pholisïau/Cynllunio-ac-amgylchedd/Cynllun-Gwella-Hawliau-Tramwy.aspx>

- 2.2 Nevertheless, the Review is different to the original Plan:

- The Review is not required to include detailed work programmes with estimates of costs. Instead, Statements of Action are presented that convey the aims and direction for the work area for a period of up to ten years. It would be unwise for any Authority to present detailed programmes and ambitious targets in light of the continuous uncertainty regarding Local Authority budgets. Instead, work programmes for a period of a year or two will be prepared that reflect the Authority's priorities and the levels of resources available.

- The Review presents three main themes rather than six, as in the Original Plan. These are the themes of the draft document:

Theme A: Maintenance and management of the Rights of Way Network and access to the Countryside

Theme B: The Definitive Map and Statement

Theme C: Assess and meet with users' needs

- 2.3 The Committee is requested for its feedback and observations on the content of the draft document and I wish to suggest that consideration is given to the following:
- Are there any areas that have not been considered or have not sufficiently been considered?
 - Do the Action Statements convey the requirements and aspirations of the people of Gwynedd regarding access to the Countryside for the next decade?
- 2.4 The draft document will be subject to a public consultation for a period of no less than 12 weeks. Prior to circulating the document the Committee's observations will be incorporated and the format and appearance of the document will be modified.

3. RECOMMENDATION

- 3.1 The Communities Scrutiny Committee is asked to offer observations on the draft Rights of Way Improvement Plan and subject to incorporating the observations, to authorise the Environment Department to use it for the purpose of public consultation. The Department will consider the observations received and will submit a final version of the RoWIP following the consultation period.

4. APPENDICES

- 4.1 Appendix 1: Draft Gwynedd Rights of Way Improvement Plan

Gwynedd Council

RIGHTS OF WAY IMPROVEMENT PLAN

REVIEW

Draft for submission to the Communities Scrutiny

Committee 25 February 2021

Contents

The vision and themes of the Rights of Way Improvement Plan

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- 1.1 Purpose of the Rights of Way Improvement Plan (RoWIP)
- 1.2 Preparing the new RoWIP
- 1.3 Description of the Gwynedd Area
- 1.4 Gwynedd Council
- 1.5 The Strategic Context
- 1.6 The Countryside Service and Ffordd Gwynedd
- 1.7 Evaluation to what extent the previous RoWIP was achieved
- 1.8 Access reform
- 1.9 Climate Change

Part 2. Theme A: Maintenance and management of the Rights of Way Network.

- 2.1 Gwynedd's Rights of Way Network
- 2.2 Responsibilities
- 2.3 Condition of the Network
- 2.4 Categorisation
- 2.5 Deficiencies
- 2.6 Resources for Rights of Way
- 2.7 Policies
- 2.8 Enforcement
- 2.9 Maintaining the Wales Coast Path
- 2.10 Information systems
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 - 2.11.1 Snowdonia National Park Authority
 - 2.11.2 Community and Town Councils
 - 2.11.3 Landowners
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- 2.12 Volunteers
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- 3.1 What is the Definitive Map and Statement
- 3.2 Use and importance of the Definitive Map and Statement
- 3.3 Definitive Map Modification Orders
- 3.4 Public Path Orders
- 3.5 Legal Event Orders
- 3.6 Cartographic problems and anomalies
- 3.7 Lost Ways

Part 4. Main Theme C: Meeting users' needs

- 4.1 To what extent do local rights of way satisfy the public now and in the future.
- 4.2 Walkers
- 4.3 Cyclists
- 4.4 Horse riders
- 4.5 Assessing the needs of people with sensory and mobility impairment
- 4.6 The demand for multi-use paths
- 4.7 Promoted paths
- 4.8 Biodiversity
- 4.9 Post Brexit agri-environment schemes

Appendices

Appendix 1 – Evaluation of previous RoWIP

Appendix 2 – Analysis of 2017 public consultation

The Vision

The vision of this Plan is that in Gwynedd we have access to the countryside, coast and green spaces that is available, is fit for purpose and safe to use.

To achieve the vision 3 themes have been identified which are key to delivering the ROWIP.

Theme A: Maintain and manage the Rights of Way Network and access to the countryside

Theme B: The definitive map and statement

Theme C: Assessing and meeting consumer needs

Statements of Action are presented for each theme; these will be the core objectives of the ROWIP.

It is emphasised that the ROWIP is not required to include detailed work programs for its life span, annual or the Countryside Service will prepare biannual work programs.

PART 1. Background

1.1 Purpose of the Rights of Way Improvement Plan

The Countryside and Rights of Way (CROW) Act 2000 placed a duty on Local Authorities to prepare a Rights of Way Improvement Plan (RoWIP), a strategic plan to manage, develop and promote the rights of way in their area.

The first RoWIP was prepared in the period between 2003 and 2007, and adopted in November 2007.

1.2 Preparing the new RoWIP

In 2016, the Welsh Government presented guidelines for Local Authorities to prepare a new RoWIP. In preparing the RoWIP it is a requirement of the Act that the following receive attention:

- The extent to which rights of way satisfy the public's requirements now and in the future.
- The opportunities offered by public rights of way for physical exercise and other recreational activities and to enjoy the outdoors.
- How accessible are local rights of way for blind or partially sighted persons and for others with mobility difficulties?

In addition, the amended RoWIP should ensure that it gets to grips with the following:

- Evaluation to what extent the previous RoWIP was achieved.
- An evaluation of the network's current condition and its history.
- Opportunities to contribute to the objectives of Active Travel
- Opportunities to contribute to Well-being objectives
- Opportunities to contribute towards achieving other plans and priorities.

1.3 Description of the Gwynedd Area

Landscape: Gwynedd has a spectacular landscape, and its quality is reflected in the landscape designations of the Snowdonia National Park and the Llŷn Area of Outstanding Natural Beauty. These include numerous Sites of Special Scientific Interest and Special Conservation Areas to protect habitats, species and geological features.

The people of Gwynedd: According to the 2011 Census, 121,874 people lived in Gwynedd, an increase of 5,031 since the 2001 census, with 65.4% able to speak Welsh. 49.2% of the population were men and 50.8% were women with 96.5% describing their ethnic group as white and mainly came from Wales or other UK countries. The Welsh Government estimate that the population of Gwynedd will continue to gradually increase to 126,200 in 2024 and 130,600 in 2034. It is also estimated that there will be an increase in the population aged over 75 years that will mainly be responsible for the increase in population. The population density in Gwynedd is low, 0.5 person per hectare compared with the Wales average of 1.5 person per hectare.

The economy: In the context of the RoWIP, there are two economic sectors that strongly influence access to the countryside, namely tourism and agriculture. It is estimated that over 7 million people visit Gwynedd annually, and on average, this produces approximately 1 billion a year for the County's economy. Various tourism businesses employ around 16,000 jobs. During the 2010 - 2020 decade, an increasing emphasis was seen on marketing Gwynedd as an attraction for various outdoor activities with walking identified as the most popular activity amongst visitors. Activities in the countryside such as cycling and mountain biking, climbing, observing wildlife and sailing are also popular activities.

Traditionally, agriculture has been the cornerstone of Gwynedd's economy and despite major changes since the Second World War; it continues to be a key industry that employs at least 5,000 people in 1,200 businesses. It is evident by now that a great number of agricultural businesses have diversified to be part of the tourism sector.

1.4 Gwynedd Council

Gwynedd Council is the local authority that encompasses the areas of the former District Councils of Arfon, Dwyfor and Meirionnydd. Although these geographical divisions no longer have a formal status the fact that Council's main offices are in Caernarfon, Pwllheli and Dolgellau means that some services continue to be undertaken based on the three areas.

The Council is responsible for all local government services including education, care, highways, planning and development control.

75 councillors are elected to represent the County's electorate; the Cabinet leads the Council, which is responsible for setting a strategic direction and operational policies.

1.5 The Strategic Context

The RoWIP cuts across and overlaps with local and national strategies and plans. These are the most relevant:

Gwynedd Council Plan 2018-23

This document identifies seven ambitions for the Council and people of Gwynedd, namely

- Enjoy happy, healthy and safe lives;
- Receive an education of the highest quality which will enable us to do what we want to do;
- Earn a sufficient salary to be able to support ourselves and our families;
- Live in quality homes within our communities;
- Live in a natural Welsh speaking society;
- Live with dignity and independently for as long as possible;

- Take advantage of the beauty of the County's natural environment.

Well-being Plans

The Well-being of Future Generations (Wales) Act 2015 placed a duty on public bodies to assess and prepare a well-being plan that meets with seven aims stated in the Act, namely

- A prosperous Wales;
- A more resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales where the Welsh language and culture is thriving;
- A globally responsible Wales.

The main messages of the Gwynedd Well-being Assessment that have been reflected in the Well-being Plan were:

- The need to maintain the healthy community spirit which is key to well-being;
- The importance of protecting the natural environment;
- Understanding the effect of the changing demography of our area;
- Protecting and promoting the Welsh language;
- Promoting the use of natural resources to improve health and well-being in the long term;
- Improving transport connections to enable access to services and facilities;
- The need for high quality jobs and housing that is affordable for local people;
- The effect of living in poverty on well-being;
- Ensuring every child has the opportunity to succeed.

Anglesey and Gwynedd Joint Local Development Plan

A plan that sets the strategic direction for land use in Gwynedd and Anglesey.

Policy PS4 is relevant to the aims of RoWIP.

Sustainable Transport, Development and Accessibility relevant to the RoWIP

Where possible safeguard, improve, enhance and promote and public rights of way (including footpaths, bridleways and byways) and cycleway networks to improve safety, accessibility (including disabled people) by these modes of travel and to increase health, leisure, well-being and tourism benefits for both local residents and visitors.

Environment (Wales) Act 2016

Part 1 of the Act presents the principles of a sustainable management method of working with natural resources namely how animals, plants, air, water, minerals and the land interact together and their link to people's well-being. The method to achieve this is by producing Area Statements. The Statements will note the priorities, risks and opportunities to manage our natural resources. Natural Resources Wales lead on the work of preparing seven Area Statements. The council areas of Gwynedd, Anglesey and Conwy have been included in the North West area statement.

The Statements consider public access provision and it is expected that they will be important documents when it comes to implement and fund the aims of RoWIP.

Active Travel (Wales) Act 2013

Active travel is travelling on foot or by bicycle for the purposes of work, education, to use public facilities, shopping. Travel for recreation is not considered active travel in the context of the Act.

The Act placed a statutory duty on Local Authorities to produce Active Travel maps for communities designated as Active Travel centres. These are the Gwynedd active travel centres:

Bangor, Caernarfon, Porthmadog, Barmouth, Bethesda and Rachub, Pwllheli, Dolgellau, Tywyn, Y Felinheli and Caeathro

Following a public consultation in 2016, maps have been prepared and these can be viewed on the Council's website.

<https://www.gwynedd.llyw.cymru/cy/Cyngor/Dweud-eich-dweud/Canlyniadau-ymgynghoriadau/Cynllun-Trafnidiaeth-Lleol-ar-y-Cyd.aspx>

Although the focus is on the urban areas, Active Travel schemes are an opportunity to create better connections within 45 minutes of travel to the centres. The rights of way network, as well as Lonydd Glas, are key to the development and growth of active travel in Gwynedd.

Tourism

The tourism sector is a key part of Gwynedd's economy with enjoyment of the countryside and beaches being the main reason given by 63% of visitors for visiting the County (*Gwynedd Tourism Review 2019*)

Over the past decade, the Gwynedd Destination Management Plan (2013 - 20) has led the Council's Tourism work. The main objectives of the Plan were to:

- extend the tourist season,
- Increase visitor spending,
- improve the quality of the visitor experience,
- improve the integration of tourism with other aspects of life,
- enhance the natural, built and cultural environment

The Covid pandemic has had a significant impact on the sector in Gwynedd with hotels and attractions having been closed for long periods. Following the relaxation of travel restrictions in the summer of 2020, some negative impacts of tourism on communities and the environment have been highlighted. This has stimulated a debate about what type of tourism industry is appropriate and sustainable for Gwynedd. In response, the Council will consider the industry in the context of the following principles:

- Celebrate and respect our communities, language and culture
- Maintain and respect our environment
- Ensure that the benefits to Gwynedd's communities are no greater than any disadvantages

Llŷn AONB Management Plan

It is a requirement to prepare and review a Management Plan for the Llŷn Area of Outstanding Natural Beauty in accordance with the requirements of the Countryside and Rights of Way Act. The current Plan is operational until 2020.

The Plan discusses eight subjects that are relevant to the AONB, including Rights of Way and Access.

Policies relevant to rights of way and access

MP1. Maintain, protect and promote key public rights of way in the area and ensure that they are available for use without obstruction.

MP2. Maintain the National Coast Path and create new links in accord with national standards and guidelines.

MP3. Promote the use of local circular routes and open access land in Llŷn.

MP4 Improve the provision for public rights of way (PRoW) users, including horse riders, cyclists and disabled people.

The AONB Team officers work closely with rights of way officers and the coastal path to implement plans and improvements on the ground.

Snowdonia National Park Plan

The Snowdonia National Park is required to prepare the National Park's Plan in accordance with the requirements of Section 61 of the Environment Act 1995 that sets two statutory purposes for the National Parks.

- Protect and improve the natural beauty, wildlife and cultural heritage.
- Promote opportunities for the public to understand and enjoy the special features of the National Parks.

The National Park Authority is preparing a new plan in 2020.

1.6 The Countryside Service and Ffordd Gwynedd

The Countryside Service is one of the Services that sits within the Environment Department. Other Services include - Planning, Public Protection, Public Transport, Parking and Street Works, Traffic and Projects and Building Control.

At the Departmental level, the Countryside Service works closely with other Services as well as with the Highways and Municipal Department, Legal Service and Estates Service.

In 2016, a structure was established for the following areas of work and duties:

- Maintain and manage the rights of way network and other routes such as Greenways
- Dealing with legal and enforcement issues related to the rights of way network including updating the Definition Map and the official statement and Highway Register.
- Develop and maintain the Coastal Path and work with organizations and communities to improve access opportunities.
- Address planning issues relating to rights of way, biodiversity, tree protection and landscape quality of the Llyn Area of Outstanding Natural Beauty (AONB)
- Implement projects, to improve access, protect habitats, and manage lands in the care of the Service.

In 2020 officers involved in the legal element of rights of way and the highway register were transferred to the Traffic and Projects Service.

STRUCTURE HERE

Gwynedd Council puts the culture of Ffordd Gwynedd - Putting the People of Gwynedd at the heart of everything we do. Each service will undertake a Ffordd Gwynedd review that

involves analysing working arrangements and processes identifying barriers, risks and opportunities. The following summarises the main risks identified in relation to Countryside Service access work:

- Reduced resources due to cuts resulting in a decline in service and how much the team can achieve
- Extra work pressure due to reduced staff causing increased workload and stress.
- Vexatious cases taking unequal officer time
- Lack of maintenance increases risk of accidents to consumers and insurance claims against the Council.
- Failure to deal with orders leading to challenges from applicants through the Planning Inspectorate.

1.7 Evaluation to what extent the previous RoWIP was achieved

When preparing the review it is necessary to re-visit the previous Gwynedd Council RoWIP, prepared between 2005 and 2007, and adopted as a Plan in November 2007.

The original RoWIP includes a Statement of Action split into six Themes namely:

Theme 1: Condition of the Rights of Way Network

Theme 2: The Definitive Map and Statement

Theme 3: Managing the network

Theme 4: Understanding User Needs

Theme 5: Current Access Provision

Theme 6: Promotion and Publicity

The six Action Themes comprise a total of 43 individual actions or options subject to funding availability.

The previous RoWIP managed to set a direction and guidance for the work of managing and maintaining the access network in Gwynedd, and it is reasonable to gather that the majority of the actions have been fully or partially achieved.

Appendix 1 gives an overview of what has been achieved by the previous RoWIP.

2.6 Access reform

In 2015, and in 2017, Welsh Government regarding the possibility of changing countryside access legislation undertook a consultation. The 2017 consultation looked at the following areas:

- Increase opportunities for outdoor recreation.
- Simplifying the processes to record and register rights of way
- Assess ways to improve communication regarding rights of way and responsible behaviour in the countryside.

Following the 2017 consultation, the Government put in place a process to consider in detail how some aspects of legislation could be changed to reducing bureaucracy on local authorities and at extending access opportunities.

In 2019, the task of looking in detail at a number of recommendations commenced, task groups were established under the lead of Natural Resources Wales looking at:

1. amending technical provisions around creating, diverting and extinguishing rights of way
2. removing the anomaly that prevents organised cycling events on bridleways
3. repeal some areas of the Countryside and Rights of Way (CROW) Act that are proving costly and inefficient, such as a closing date to register lost ways by 2026
4. Creating multi use paths , allowing cycling and horse riding on public footpaths,
5. Extending access land to the coast and cliffs.
6. Prepare one statutory digital map of all rights of ways, access land and national trails.

The task groups are due to report to Welsh Government with their recommendations on the way forward during the spring of 2021.

1.9 Climate Change

Gwynedd Council has declared a Climate Emergency, which conveys that the Authority recognises and is prepared to take action and to influence others to take steps to mitigate the effects of climate change.

The effects include

- Increased frequency of extreme weather events is already being felt in the County.
- Increased flood risk, 23,244 Gwynedd residents live in areas of high flood risk.
- Sea levels are predicted to rise by up to 1.9m by the year 2100; sea level rise is already a threat to coastal communities such as Fairbourne.

The above is already having an impact on path infrastructure, from loss of bridges, erosion of footpaths to loss of paths due to coastal cliff erosion. The implications of climate change must be considered when planning for the creation of new routes and major improvements to existing ones.

The Council will be preparing a Climate Change Action Plan that will set the direction for responding to the challenge. The impact on paths and green spaces will be addressed in the Plan.

DRAFT

Part 2: Theme A

Maintenance and management of the Rights of Way Network and access to the Countryside

2.1 The Rights of Way Network in Gwynedd

Gwynedd Council is responsible for the Rights of Way network, which is approximately 3800km long. A public right of way is defined as a highway available for public use to be used, free of charge, in accordance with its status and at any time.

Status		Length (km)
Footpath	walkers	3345
Bridleway	Walkers, horse riders, cyclists	305
Restricted Byway	Walkers, horse riders, cyclists, horse and carriage	79
Byway open to all traffic	Walkers, horse riders, cyclists, horse and carriage, motorised vehicles	39

In addition to the registered rights of way network, access provision available to the public includes:

- Lonydd Glas and Permissive Paths : over 60km
- Open Land (CROW Act 2000): 105,029ha (mainly mountain land within the National Park Area)

Since 2007, approximately 50km of new rights of way have been created. New rights of ways have been created in order to establish the Wales Coast Path in Gwynedd and to develop new multi-use paths such as Lôn Gwyrfai and Lôn Las Ogwen.

2.2 Responsibilities

Gwynedd Council is the highways authority with a statutory duty to protect and maintain the network. The public, community councils and others turn to the Council to safeguard and resolve practical and legal matters that arise.

The Council's main maintenance responsibilities are:

- Rights of way signage when paths leave the highway
- The surface of the most rights of way is the responsibility of the Council.
- Bridges and Structures
- Management of vegetation and removal of obstructions

It is the landowner's responsibility to maintain and repair path furniture such as stiles and gates including those installed by the Council and the National Park on category 1 and 2 path or as part of access improvement schemes.

2.2 Condition of the Network

Gwynedd Council has never undertaken a full assessment of the condition of its rights of way network. The most comprehensive survey was undertaken as part of the work to prepare the original RoWIP in 2004/05 when approximately 35% of the network was assessed.

Up to 2012/13 an annual assessment of 5% of the network was undertaken, this survey which carried out in line with national guidelines for measuring the performance of Welsh Local Authorities.

These surveys were stopped due to the lack of staff resources to administer and process the data. It was also felt that such a small sample, considering the size of the Gwynedd network and the associated effort, was an ineffective use of scarce resources.

In order to try to convey a picture of the network's condition and the financial implications of its maintenance, data collected by the Ramblers Association members as part of their Pathwatch campaign and information gathered by Council and National Park officers was used.

A summary of the information can be seen in table 2.

2.3 Categorisation

Before expanding on the network's condition, the categorisation system has to be considered. The Council adopted categorisation some 15 years ago in order to prioritise its efforts and resources to maintain paths. The system was established jointly with Town and Community Councils, the outcome was to place the majority of rights of way within one of five categories based on an assessment of their use and importance in terms of connectivity and potential to upgrade them. For convenience, the number of categories was reduced to four in 2010. Table 1 gives the category definition and the percentage of the network in each category.

Table 1

Category	Definition	% of the network;
1.	Paths that facilitate people's movements. These usually have significant usage or for connections within towns, villages or between public transport facilities, car parks and leisure attractions.	15
2.	Popular paths mainly used for recreational purposes including paths around communities, circular walks or access to beaches or promoted paths.	27
3.	Paths, whilst being less used, form significant connections between the paths in categories 1 and 2 or between communities.	46
4.(5)	Paths with only occasional use but still form part of a full and effective network. These can include possible connections between communities where there is not much to encourage walking.	12

As the main purpose of the categorisation system was to prioritise resources it was integrated within the Authority's Rights of Way Policies (*these are discussed in part 2.7*)

- Policy 1.3 deals with the Maintenance of stiles and gates
- Policy 1.4 deals with the maintenance of surfaces and controlling vegetation
- Policy 1.8 deals with surveys and the frequency of inspections of the condition of rights of way.

During the 2000's the maintenance of categories 1, 2 and 3 was prioritised, due to reduced resources since 2014 priority has been given to categories 1 and 2 only, which is approximately 42% of the network.

It would be reasonable to assume that a commitment to the categorisation system would in time impact on the physical condition of the paths. This impact can be seen by looking at the items of work undertaken on paths within the individual categories, for example for the year 2017 /18 the following were recorded

Work items on Category 1 paths	650
Work items on Category 2 paths	658
Work items on Category 3 paths	582
Total number of work items	1,890

This trend can also be seen in Table 2, showing the range and distribution of problems identified on 1.021 km of rights of way in categories 1, 2 and 3 , approximately 27% of the Gwynedd network. (source Pathwatch, recorded by Gwynedd and SNPA staff, 2018)

Main problems / deficiencies	Category 1	Category 2	Category 3
<i>Type of problem</i>	<i>Number of problems</i>	<i>Number of problems</i>	<i>Number of problems</i>
Roadside signs missing / broken	24	22	86
Missing / broken Way markers	23	23	35
Ladder stile /	1	4	19
Stile with one or two steps	1	8	26
Stone stile	0	1	1
Kissing gate	1	3	17
Gate < 1.2m	0	3	24
Gate 1.2m - 2m	2	7	21`
Gate /	0		10
Steps	2	1	1
Bridges < 2m	2	10	31
Bridges 2m - 5m	0	3	1
Bridges > 5m	3	4	1
Surface in poor condition	36	69	46
Side overgrowth / invasive plants	25	17	28
Surface vegetation	6	22	34
Felled trees	2	29	22
Land Use / quarry / forestry			17
Other	10	10	29

Whilst this information is, only a snapshot of the condition of the network it clearly points towards the conclusion that the condition of paths in categories 1 and 2 is overall better than those in categories 3 and 4.

During the public consultation conducted in 2017, there was some criticism of the categorisation system as it inevitably results in the deterioration of paths in the lower categories.

2.4 Problems encountered on rights of way

Problems on rights of way can be divided into three main types

Minor problems - seasonal overgrowth, fallen tree limbs, localises seasonal flooding, poorly installed and maintained furniture or lack of signage. These problems will be inconvenient to the user but do not necessarily make the path unusable.

Major problems - flooding and drainage problems, unsafe or dangerous bridges, landslips or fallen trees, defective and dangerous furniture, badly eroded surface. These problems are likely to make the path unusable but can in most cases be resolved with adequate resources.

Deliberate obstructions - paths obstructed by fences, walls or other barriers and by locked gates. It may be possible to resolve some of these problems with better furniture and signage, they may also be resolved with discussions between officers and the landowner or their representative if this fails the Council will have to take enforcement action.

These problems are evident in the responses received to the Public Consultation Questionnaire.

61.2% of those who answered stated they had come across a problem when using rights of way. Summary of response

Problem encountered	% of respondents
Deliberately blocked paths	54.3
Lack of signs or misleading signs	29.3
Overgrowth / fallen trees	28
Gates / stiles in poor condition	39.2
Bridges in poor or dangerous condition	21.4
Aggressive dogs	26.5

STATEMENT OF ACTION - 1

1a. Continue to prioritise paths in category 1 and 2

Although there is some criticism of the categorisation system; in the short term, this is the most practical system to keep the most popular paths in a satisfactory condition. It should be acknowledged that it is not possible to give full attention to every path in Categories 1 and 2, and the lack of maintenance on the remainder of the network leads to a backlog of work and costs if these are to be restored to an acceptable standard.

1b. Update and re-categorisation

To reflect the current needs of the County's communities, efforts will be made during the lifetime of the ROWIP to identify and pilot an effective and equitable way of updating and re-categorizing rights of way.

1c. Assessing the state of the network

The Ffordd Gwynedd review has highlighted that we do not have basic information about the condition of the network.

Efforts will be made to conduct a comprehensive survey of the condition of Gwynedd's rights of way to be used to establish a baseline against which to measure performance, assist in the re-categorization of paths and to prioritise available grant funding.

2.6 Resources for rights of way

The function to maintain the rights of way together with the funding lies within the Countryside Service. During the lifespan of the original RoWIP, the annual core budget for maintaining rights of way was reduced from £351k in 2007, to £170k in 2019. During this period, the Service lost five front line staff, two Rights of Way inspectors and three Countryside wardens.

From the existing budget, approximately £32,000 is allocated to support maintenance work (annual cut of vegetation); this leaves approximately £143,000 for everything else. Because of the categorisation system, the majority of the expenditure will be on category 1 and 2 paths, i.e. approximately 42% of the network (around 1,700km).

Additionally, the Service has a responsibility for maintaining the Lonydd Glas network; a core budget of £16,000 has remained fixed since 2010.

A sum of £50,000 has been allocated from the Councils structures budget towards maintaining and upgrading bridges and other structures on the rights of way network.

According to the original RoWIP, an annual budget of **£380,586** was required to maintain the furniture and annual control of vegetation on category 1, 2 and 3 paths. This estimate remains relevant, and if only paths in categories 1 and 2 are considered and bearing inflation in mind (average of 3%); a baseline budget of **£232k** is required to maintain

category 1 and 2 paths in a satisfactory condition. A satisfactory condition is defined as an unobstructed, signposted path with furniture that is safe and easy to use; the nature of the furniture will vary according to the status of the right of way.

The entire annual core budget is used for maintenance and reactive work in response to complaints or the impact of extreme weather. Increased pressure on the maintenance budget is anticipated due to the advent of ash die back a disease which will affect most of the County's ash trees. The Service will be required to take action to ensure public safety on lands for which it is responsible such as the Lonydd Glas. In addition, there will be a need to ensure that landowners take action to fell dangerous trees close to rights of way.

In order to make major improvements such as resurfacing path, erecting major bridges and new structures the Service has sought to secure grant funding, these are example of some of the grants received between 2010 and 2020.

- Over £900,000 was received via the Rights of Way Improvement fund between 2010 and 2017.
- Active Travel funding has contributed towards improvements to the Lonydd Glas and path identifies as Active Travel routes.
- £100k from the Coastal Communities fund towards establishing 18 circular paths off the Coastal Path.
- In 2020 / 21, £243,446 was secured from the Welsh Government Access Improvement grant programme. This fund will be available in 2021 / 22.
- Between 2017 and 2020, £85,000 was received towards access improvement within the Llyn AONB.

External grant funding is essential for major improvements to the network but the bidding process and successful delivery requires experienced staff to prepare applications, organize and oversee work. We must therefore ensure that we have the staff resources to make the most of the opportunities that arise and if possible, to include staff costs within grant applications.

STATEMENT OF ACTION 2

2a. The Service will make every attempt to secure grant monies for strategic improvements to the network by joint working within and outside the Council.

2b. Sufficient staff resources must be secured in order to bid for and deliver grant aided projects.

2.7 Policies

Following the publication of the original RoWIP, a Public Rights of Way Policies document was prepared and published. The current document can be viewed on the Council's website

<https://www.gwynedd.llyw.cymru/cy/Trigolion/Dogfennau-trigolion/Parcio,-ffyrdd-a-theithio/Polisiau-Hawliau-Tramwy.pdf>

The purpose of this document is to summarise and explain the Council's responsibilities and to give guidance for the physical maintenance work on the network together with the legal processes to protect and revise public rights of way.

The policy document places great emphasis on the Categorisation system, nevertheless, it is stressed that Categorisation is a system to prioritise resources and does not remove the Council from its statutory duties to maintain and protect the whole network including a responsibility for the public's health and safety, whatever the path category. When the Service receives reports from the public, priority has to be given to issues that may have an impact on public health and safety, including Council staff. In responding to such reports the Countryside Service, officers have to assess the risk and determine what action to take. If the damage is significant, for example a collapsed bridge or a path lost to the sea, there will be no choice but to close the path and try to secure resources to restore it. In such cases, priority is given to paths within category 1 and 2.

The document continues to be an effective tool and sets the basis for the Service's work, however, due to the reduction in staff resources and finance it is no longer possible to implement some of the document's recommendations. For example:

- Policy 1.8 Surveys and Inspections - it is not practically possible to maintain the level of condition surveys in accordance with the policy, namely that 50% of category 1 network paths are to be surveyed annually.
- The budget does not allow a proactive programme to cut vegetation and for improvements.

Since the publication of the Policies document, some changes have been seen in land use and farming methods that have an impact on rights of way.

- Policy 2.11 Electric Fences - it is necessary to review this policy to reflect the increase in use of electric fences for stock management.

STATEMENT OF ACTION 3

3a. Priority is given to respond to enquiries where there is a danger to public safety.

3b. The Rights of Way Policies document has to be updated to reflect the levels of current resources and other changes that have influenced rights of way over the last decade.

2.8 Enforcement

The Rights of Way Policies document outlines how officers will implement actions to force landowners and others to remove obstructions and protect public rights. The public can also present a formal notice to the Highways Authority to act to open an obstructed right of way.

In the vast majority of cases, every effort is made to resolve a dispute by persuasion and discussion with landowners and users. In the end, this approach leads to a better relationship between different parties and reduces the burden of bureaucracy. Since 2015, the Countryside Service has made only two cases of formal enforcement, which is evidence of the staff's ability to negotiate and to take fair and commensurate action in line with the circumstances.

In accordance with the Categorisation policies, priority is given to enforcement efforts for category 1 and 2 rights of way.

STATEMENT OF ACTION 4

4a. We aim to open up and have a well signed the public rights of way network

4.b Every effort will be made to avoid formal enforcement action by discussing and negotiating with landowners and stakeholders.

If there is no other option but to take formal proceedings, then efforts will be prioritised for category 1 and 2 paths.

2.9 Maintenance of the Coast Path

Gwynedd has played a key role in the development of the Wales Coast Path, with 300km or close to 25% of the Coastal Path in the County.

National standards were established to maintain the path and to ensure consistency throughout Wales. Since 2015, coastal Local Authorities in Wales have received annual funding towards maintaining the Coastal Path. Funding is apportioned according to a national formula, currently £643 is given for every km of paths or other access rights and £20 for every km for sections of the path on roads, beaches or promenades. This arrangement means that Gwynedd receives approximately £80,000 a year towards the maintenance of the Coast Path.

STATEMENT OF ACTION 5

5a. Gwynedd will continue to maintain the Coastal Path in accordance with national standards subject to the continuation of the current funding arrangement.

2.10 Information systems

Since around 2005 rights of way, officers have used the Countryside Access Management System (CAMS) a digital system for collecting and recording information about the condition of the rights of way network. In 2014/15, the use of system was reviewed to take advantage of technology that enabled remote working. Since 2015 officers have been, using tablets while out in the field to record work and problems. The value of having mobile technology has been demonstrated during the Covid pandemic, allowing rights of way officers to continue working.

The CAMS system was considered as part of the Service's Ffordd Gwynedd review and it was concluded that the system was an important tool for the work of the service, especially the ability to work remotely. However, it was recognised that the function for recording enquiries and complaints was difficult to use and was not being fully utilised.

ACTION STATEMENT 6

6a Having a fit for purpose technology is essential for recording information and working effectively in the field. Attention will be given to how best to make best use of the existing system and how it can be adapted to better meet the requirements of the Service

2.11 Partnership working

Many agencies and organizations contribute to providing countryside access in Gwynedd. The Countryside Service has a long tradition of working in partnership to achieve common goals for the benefit of all.

2.11.1 Snowdonia National Park Authority

The Snowdonia National Park Authority (SNPA) plays a leading role in access provision in Gwynedd. The Park area attracts over 4 million visitors a year, in 2018; there were 557,991 visitors to Snowdon and 66,241 to Cader Idris.

There are 2,409km (1,497 miles) of rights of way in the Park area, which is nearly 64% of Gwynedd's total network. From above 375km (233 miles) are SNPA promoted paths.

Gwynedd Council is the statutory highways authority with responsibility for all legal matters relating to rights of way within the Park area of Gwynedd. SNPA is responsible for open access land in accordance with the Countryside and Access Act 2000.

Over the years, the Park has concentrated effort and resources to maintain the most used routes and develop circular routes that serve local communities as well as visitors. They have also secured funding for the development of multi-purpose paths such as Lôn Gwyrfai and have begun to develop the Snowdon Circuit, which is a low-level route around Snowdon.

The original ROWIP stated the intention to negotiate a formal agreement between Gwynedd Council and the Park in order to establish a more integrated approach to access. The two authorities have agreed principles for joint working that recognize the roles of both organisations. Further steps will be needed over the coming years to build and strengthen the relationship.

ACTION STATEMENT 7

7a. Continue to build relationships and collaborate with SNPA

2.11.2 Community and Town Councils

Gwynedd Council recognises the importance of the work and input of the Community and Town Councils in maintaining rights of way within their areas. An engagement exercise over the winter of 2016/17 showed that the vast majority of Community and Town Councils were keen to see popular routes maintained and improved. Many councils understood that access opportunities are important to the economy and the well-being of local people.

In order to support the work of the Community Councils the Council continues to operate a reimbursement of maintenance costs undertaken by them. However, a reduction in the core budget has meant that this contribution has also been reduced.

Up to 2016 approximately £ 70,000 was repaid annually to the Community Councils, since 2016 the contribution has reduced to £ 32,000. The funding must only be used to maintain category 1 and 2 routes.

As a result of the change the number of community Councils taking advantage of the opportunity has reduced from 53 in 2016 to 48 in 2019 (note that some Councils have never been part of the arrangement and that 5 Penllyn CC is one entity of under the Penllyn Partnership). The reduction in funding available to the Community Councils has meant that the Council has had to take on the additional work in many areas. On the other hand, some Community and Town Councils have used their own budgets to increase their expenditure on maintaining paths within their area.

ACTION STATEMENT 8

8a. Continue to work with Community and Town Councils to support their maintenance of locally important footpaths.

2.11.3 Landowners

The vast majority of public rights of way cross private land and property and therefore it is essential that Countryside Service officers develop good relationships with a wide range of landowners and land managers. Without a constructive relationship, it would be extremely difficult to manage and improve access to the countryside.

The National Trust owns coastal lands and has been a key partner in the development of the Coastal Path.

Although a high percentage of paths are on agricultural and forestry land there are also paths within towns and villages, industrial estates, holiday centres and even crossing private gardens. The existence of paths close to houses can affect the privacy of residents and in such cases; staff must show diplomacy and tact when dealing with sensitive situations.

2.11.4 Natural Resources Wales

Natural Resources Wales (NRW) collaborates and influences the work of the Countryside Service in a number of ways.

- NRW is a significant landowner, particularly of forestland in Meirionnydd, there is a need to work with land managers to ensure that forestry works do not infringe on public rights.
- NRW is responsible for administering the Wales Coast Path grant that pays for a project officer, maintenance and improvements in addition to several grant funds including support for work within the Llŷn AONB
- NRW leads on the preparation and updating of the Area Statements and co-ordinates the Access Reform Programme.

2.11.5 User Groups

Contact with members of different user groups occur in a variety of ways. They assist the Service in reporting problems and identifying improvements needed.

Acquiring the perspective of a wheelchair user makes all the difference when designing new routes and their expertise is valuable in preparing improvements to bridleways and cycle ways.

Local representatives also respond to consultations on legal orders as well as lobbying and bringing issues to the attention of local and national politicians.

2.12 Volunteers

The Countryside Service has endeavoured over the years to support and increase volunteering opportunities for individuals and organisations. Volunteers have contributed to work on the rights of way network, the Lonydd Glas and on nature reserves and woodlands.

Volunteers are able to undertake a wide variety of tasks; however, supporting a volunteer workforce cannot happen without support and the organisational work undertaken by Service staff. At all times the main consideration has to be the health and safety of volunteers and to ensure that they have the equipment and materials to achieve the task.

There is now a better understanding of the benefits that individuals gain from volunteering

- improvement in physical and mental health,
- socialising,
- Gaining new experiences and skills.

There is an increase in interest in volunteering, however, this would not be very effective without a dedicated member of staff to organise and liaise the work of the volunteers.

ACTION STATEMENT 9

9a. The Service will identify opportunities to extend and strengthen links with organisations and individuals who are keen to volunteer and will seek funding to support their work.

2.14 Local Access Forums

Access Forums are statutory bodies that provide independent advice on access and outdoor recreation issues. Membership of the Forums covers a wide range of user and landholder interests.

There are three Local Access Forums in operation in the Gwynedd area. These are:

- Arfon and Dwyfor Forum - administered by the Countryside Service
- National Park North Forum - administered by SNPA
- National Park South Forum - administered by SNPA

The Forums respond to consultations by Government and public bodies on issues that will influence access and land use in Wales.

Part 3: Theme 2. The Definitive Map and Statement

3.1 What is the Definitive Map and Statement?

Because of the introduction of the National Parks and Access to the Countryside Act 1949, it became a requirement for local authorities to prepare a definitive map and statement.

The first step, that was started in the early 1950s, was to conduct a survey of the footpaths, bridleways or roads used as public paths. The survey led to the preparation of a draft map and then a provisional map. During the process, there was an opportunity for individuals, organisations and landowners to make representations and object to proposals to register rights of way.

The final step was to prepare the definitive map, in the case of Gwynedd this entailed two maps namely the definitive map for Merionethshire (publication date 13.8.1964) and the Caernarvonshire definitive map (publication date 2.1.1975).

3.2 Use and importance of the Definitive Map and Statement.

The Definitive Map is the foundation of the Authority's work in the field of rights of way and is key to the work of managing the Rights of Way network. This is the record that shows the location and status of the right of way and it cannot be altered in any way unless a legal order is confirmed.

The map's accuracy is vitally important when the Council considers Planning applications, or for prospective land or property buyers. Failure to consider the definitive map may lead to a dispute between neighbours and between individuals and the Council.

The Countryside Service on large numbers of A1 sized sheets keeps the Definitive Map, and hard copies are provided to the public, developers and landowners upon request. There is a digital version of the map that is used on Council mapping systems and provided to the Ordnance Survey; however, current legislation does not acknowledge the digital versions as the true definitive map.

In 2019, the digital version was placed on the Council's external website.

<https://www.gwynedd.llyw.cymru/map/default.htm?iaith=cy&xC=257293&yC=336548&layer=29&level=1>

The map can be used to submit a query or complaint regarding the condition of a specific path. Although the online map is an effective way of presenting information, it should not be depended upon to resolve uncertainty regarding the line of a path, and the public are encouraged to arrange to see a hard copy of the definitive map.

STATEMENT OF ACTION 10

10a. Keep and update the definitive map and written statement

10b Maintain and update the map on the Council's website and promote its use.

3.3 Definitive Map Modification Orders (DMMO):

Any user, landowner or land occupiers can apply to the highway authority to modify the Definitive Map. This is done via a Definitive Map Modification Order, in accordance with section 53b of the Wildlife and Countryside Act 1981.

When preparing the application the applicant must gather and present information to support the order, the Council will assess the application based on the evidence. The evidence may for example be evidence of use or documentary and historical evidence.

It is vital that the Council take a balanced view of the application and give a fair opportunity for supporters and objectors to present arguments in favour and against the Order.

Where possible efforts will be made to find a solution between the various interests, however, the likelihood is that the majority of applications will lead to a Public Inquiry.

Due to the emphasis on accuracy and the standard of evidence and the likelihood of having to justify the determination to accept or refuse an application in a public inquiry, it is inevitable that the process is heavy in terms of the Countryside Service officers' time as well as the Council's legal service.

Due to a series of budgetary cuts since 2010, currently one dedicated member of staff is available to deal with DMMOs as well as other orders. Consequently, there is a backlog of applications and as of January 2020, 60 applications had been registered. The public are able to see the full list DMMO applications on the Council's website.

On average, the Council receives three new application a year, currently it takes at least four years for a DMMO application to be completed especially if it leads to a Public Inquiry.

Of the 60 outstanding registered applications, 29 pre date the 1996 reorganisation of Local Government. It must be noted that the legislation does not allow the authority to disregard any application regardless of the date it was registered.

If an application has not been decided within 12 months of registration, the applicant may ask the Planning Inspectorate to set a timeframe for the Council to reach a decision

The Council can adopt a procedure to prioritise applications. Policy 3.3 of the Gwynedd Rights of Way Policy document sets out the criteria for prioritising applications. Experience of recent years has shown that there is a need to strengthen the criteria and to include a system to score and rank applications.

STATEMENT OF ACTION 11

11a. Procedures will be introduced to rank DMMO applications so as to make the best and most efficient use of available resources

The procedure will be explained to applicants and will be used to respond to appeals made to the Planning Inspectorate.

3.4 Public Path Orders (PPO)

If the Council considers that, a change to the Definitive Map is desirable then this may be made using several legal procedures and Public Path Orders. The main motivation for the Council in making or supporting a PPO is the resultant benefit to the network and users.

For example, S25 of the Highways Act 1980 is used to create new paths via an agreement with the landowner; S25 has been used successfully to improve the Coastal Path line.

A right of way may be diverted by using S119 of the Highways Act 1980; it is a useful tool to avoid hazard spots or to solve a dispute between a landowner and users.

3.5 Legal Event Orders (LEO)

The purpose of the LEO is to record onto the Definitive Map the changes that stem from DMMO, PPO or other events such as Side Road Orders made because of highway improvements.

The completion and processing of LEO ensures that the Definitive Map is updated and kept current.

3.6 Cartographic problems and anomalies

The Definitive Map has several types of discrepancies or anomalies for example, differences between what is shown on the map and what is written in the accompanying statement,

paths that end without any link to another path or highway, the line of a path shown going through a pre-existing building or structure.

Many of the discrepancies date back to the time when the draft map and the provisional map were prepared, nevertheless, such discrepancies can be grounds for a dispute between landowners and the Council and between one owner and another.

To resolve a large number of these anomalies, a DMMO process has to be followed; again, this would have significant resource implications.

The 2007 RoWIP, noted that around 200 anomalies had been identified requiring a DMMO to resolve them. Since then, unless cases have arisen that mean that it is essential to resolve a discrepancy it has not been possible to respond to the vast majority of the 200 anomalies. It is unlikely that resources will allow these anomalies to be resolved in the future and they have to be dealt with on a case-by-case basis.

STATEMENT OF ACTION 12

12a. The list of discrepancies and anomalies on the definitive map will be kept under review, steps will be taken to resolve them if resources permit.

3.7 Lost Ways

The term 'lost ways' is used to describe paths that have never been identified and recorded on the definitive map. The Countryside and Rights of Way Act, 2000 imposed a deadline of January 2026 to register 'lost ways', based purely on historical documentary evidence that is pre 1949.

It is worth noting that this Section of the Act has not been implemented in Wales and is under review within the Access Reform Programme.

Part 4 : Theme C. Meeting users' needs

4.1 To what extent do local rights of way satisfy the public now and in the future.

In order to try to identify users' needs the public were given an opportunity to give their views in an engagement campaign in 2017. There were 1,386 valid responses; a full report of the questionnaire's findings can be seen in Appendix 2.

It should be borne in mind that individuals, whatever their physical abilities, belong to more than one group of users.

In response to the Rights of Way questions

- 43.6% of those who responded said that they walked on public rights of way daily
- In response to the question "What are your main reasons for using Rights of Way?", 71.7% answered in order to keep fit, 59.1% to watch wildlife and enjoy the countryside and 38.8% said to take the dog for a walk.
- 61.2% of those who answered had come across a problem when using rights of way.
- One of the main findings of the consultation was that circular paths and local paths were favoured by the majority of users rather than long distance paths.
- In response to question asked in the Questionnaire, "Do you believe that the existing rights of way network is suitable and meets the needs of most users?" 44% stated that they were satisfied and 41% stated that they were not (15% had not answered)
- In response to a question regarding how the network could be improved, of those who answered they were not satisfied with the network, a high percentage were keen to see more cycle paths, bridleways and 18.3% believed that cyclists and horse riders should have the right to use the majority of footpaths.
- There was strong support to amend legislation to facilitate the work of Local Authorities to create and revise rights of way.

In addition to the questionnaire, the opinions of the Town and Community Councils and the Access Forums were sought. There were clear themes from the consultation namely the desire to have -

1. A network that provides easy connections within communities for recreation, keeping fit and active travel.
2. A network that offers better provision for all user sectors.

4.2 Walkers

Walkers have the right to use the whole rights of way network, with many walking their dogs or with a pram or a child's pushchair.

National evidence indicates that a walk of approximately three miles is what is usual for most people. The 2017 consultation demonstrated that many people wanted to have circular paths that are close to communities, convenient, and safe to use. This need was demonstrated during Covid lockdown in 2020 that showed increase use of path close to communities.

Many the paths can be improved for the benefit of all users by implementing the principles of least obstructive access, namely replacing stiles with gates and, if possible removing gates subject of course to the need for stock management.

4.3 Cyclists

Over the past decade cycling both on and off the highway has grown in popularity.

Cyclists can use rights of way that are bridleways, restricted byways and byways that are open to all traffic. Additionally, Gwynedd has a network of Lonydd Glas that are multi-use paths mainly developed on former railway lines.

The Lonydd Glas are also part of the national cycling network, Lôn Las Cymru (Number 8) that uses a combination of Lonydd Glas, quiet lanes and paths on Natural Resources Wales' forestry land.

The Lonydd Glas have also been identified as Active Travel paths as they provide easy travel between communities -

- Lôn Las Ogwen – Bangor – Glasinfryn – Tregarth – Bethesda
- Lôn Las Menai – Caernarfon – Y Felinheli
- Lôn Eifion – Caernarfon- Groeslon, Penygroes, Bryncir

The current network was developed and upgraded over a period of 20 years, the main paths now have a tarmacadam surface and major improvements have taken place as a result of

securing grants, e.g. opening a 'Twnnel Tywyll' (dark tunnel) to have a direct connection between Tregarth and Bethesda.

4.4 Horse riders

Only 10% of the rights of way network is available to horse riders. In addition, current provision is fragmented and this means that it is not possible to follow a journey without having to venture onto the highway. As there are obvious dangers linked to horse riding on a busy main road, the British Horse Society and other equestrian groups campaign to improve the provision for horse riders.

The Council can act to improve provision by

- Carrying out physical improvements to bridleways and existing byways, this may include modifying gates to make them easier to open and close when on horseback. Horse riders are also eager to have full use of the Lonydd Glas network. Currently, use is permitted on Lôn Las Ogwen and sections of Lôn Eifion, in the past it was resolved to limit the use of Lonydd Glas for the safety of horse riders and other users.
- Registering new rights or upgrading existing rights via the DMMO process. As noted in section 3.3, this system is often contentious and the majority of landowners and managers are unwilling to cooperate to upgrade a right of way from a footpath to a bridleway or byway.
- Include provision within Active Travel plans and projects, although equestrian use is not a consideration under current Active Travel guidance.

4.5 Assessing the needs of people with sensory and mobility impairment

According to the 2011 Census, 20.5% of the population of Gwynedd stated that their day-to-day activities were limited due to disability. It was noted that 9.7% (11,824) had a high level of restriction and 10.8% (13,184) had a low level of restriction.

The Council has a duty, in everything the Authority does to conform to the requirements of the Equalities Act 2010, to reduce inequality be that based on race, age, physical disability, religion or sexual orientation. It must also has to take into consideration the Well-being of Future Generations Act.

In the context of access to the countryside, the main attention is on how it is possible to respond to the needs of individuals with mobility difficulties or are blind or partially sighted.

In response to the consultation, 7% of those who responded stated that they did not use rights of way due to disability, age or poor health reasons.

It has to be recognised that the landscape and topography of Gwynedd will be a barrier to some users; however, this should not be an excuse not to take practical and reasonable steps to improve access for all.

Practical steps -

- Implement the least obstructive methods in relation to rights of way and Council managed paths. The obvious example would be to replace a stile with a gate, and if possible to totally remove the gate. This can also include reducing obstructions near the access to Lonydd Glas paths unless they are safety reasons that cannot be mitigated
- Install a tap rail on bridge parapets or boardwalks to assist blind or partially sighted persons to familiarise themselves with the location.
- Paths with level surfaces without potholes are much safer and convenient to use by wheelchairs and individuals who find it difficult to keep their balance.

Although practical steps are important, it is also necessary to consider that paths can be promoted better by using technology, signage and information in a way that is easy to reach and read. An obvious example would be to ensure that an interpretation panel is at a height that a wheelchair user could read it.

The Countryside Service has endeavoured over the years to understand and act for the benefit of individuals with sensory impairment. Nevertheless, there is room for closer cooperation with organisations and user groups to better understand the needs and aspirations of users.

STATEMENT OF ACTION 13

13a. Implement the least obstructive principle of access - replace stiles with gates where possible, reduce obstructions on Lonydd Glas and other multi-use paths.

13b. Identify and improve paths within convenient reach of communities to be used by local people and by people with mobility and sensory impairments.

13. c Work with partners within and outside the Council to identify opportunities to improve access for all.

13d. Raise awareness and promote paths that are suitable for all.

4.5 The demand for multi-use paths

It is evident from consultation with user groups and from enquires to the Countryside Service that there is a desire amongst a significant section of users for more multi-use paths. These are paths for walkers, cyclists and horse riders, which meet with the needs of people with mobility difficulties.

Extending the availability of multi-use paths would certainly meet the needs of the majority of users. For example the Lonydd Glas network are used for recreation, keeping fit, relaxing, for Active Travel (going to and from work or school) and are a valuable resource for the tourism industry in Gwynedd.

Whilst the Council has successfully collaborated over the years with others to extend the Lonydd Glas network and other multi-use paths, however there are legal and practical factors that can stop or delay progress, such as:

- To enable higher rights (cycling and horse riding) on an existing public footpath, the status of the path has to be changed. If the landowner does not support the change the Council or a third party has to resort to the use of the DMMO procedure or an order under S26 of Highways Act 1980. A path can also be upgraded to a Cycle Track under the Cycle Track Act 1984, but this would not permit equestrian use. In all cases, the legal process can be complex and can take many years to complete.
- In order to extend the Lonydd Glas network on land that has no legal public access rights. The path corridor would have to be purchased or new rights created.
- There are substantial costs associated with creating new multi-use paths, e.g. the total cost of extending Lôn Las Ogwen between Tregarth and Bethesda including opening 'Twnnel Tywyll' was approximately £800,000.
- Due to their popularity and range of users, multi user paths require a higher level of maintenance.
- Not everyone agrees with permitting every use of a path, there are concerns about safety, especially conflict between different users and in relation to uncontrolled dogs or feeling intimidated by horses or bikes ridden at speed. Whilst these concerns should not be dismissed, they can be overcome with good design, information and engagement with users.

The need for multi user paths is addressed within the Access Review process, with proposal for cyclists and horse riders to be allowed to use existing public footpath. The outcome of the Review is expected during 2021, however any legislative changes will take longer to implement.

STATEMENT OF ACTION 14

14a. The Council will favour improvements to the network that offer multi-use provision.

14b. Unless sound safety reasons exist, use of the Lonydd Glas network by horse riders should be permitted.

4.7 Promoted Paths

The Council has over the years to provide circular and long distance paths that facilitate and encourage access for the benefit of local residents and to meet the aspirations of tourists to enjoy the beauty and heritage of Gwynedd. These routes often follow a theme related to local history or wildlife.

The importance of walking tourism to the rural economy is clear, walking tourism is estimated to bring £ 550million annually to the Welsh economy with the coastal path accounting for £ 32m.

Most promoted routes use public rights of way, quiet roads and paths on land owned by organisations such as the National Trust. In creating a promotional route the Council recognises that the paths must be well maintained ensuring that the furniture is intact, safe and the paths clearly signed.

The Council Tourism Service has worked with the Countryside Service over the years to promote and market promoted routes locally, nationally and internationally. Most of the marketing takes place on the Snowdonia Mountains and Coast website. Although less popular now, traditional methods such as a leaflet, booklet or information panel are still used to promote a route. In recent years, it has become common for the information to be available only on the web and on smartphone apps.

Many routes and trails are promoted on line by organisations and enterprises who act independently of the Council or the SNPA.

Technology offers new opportunities, for example, the Coast Path has been filmed and can be followed using Google Street on Google maps.

Many promoted paths have been established with the help of one-off grants, not only by the Council but also by Community and Town Councils, regeneration agencies and community enterprises. This investment means that many paths are improved for the benefit of the wider community but in most cases grant funding does not provide cover ongoing maintenance and upkeep. The costs of this work has to be borne by the

Countryside Service, there are however, exceptions such as the Coast Path which receives an annual maintenance grant and the Snowdonia Slate Path which is managed as a Social Enterprise.

Unfortunately, some promoted paths have deteriorated due to lack of maintenance. Alternative means of maintaining promoted routes must therefore be considered, for example:

- Rationalize the routes and concentrate resources to ensure smaller numbers are in good condition.
- Encourage organisations who are considering establishing a promoted path with grant to consult with the Countryside Service at an early stage to discuss its creation and long-term maintenance.
- Establish and maintain a volunteer workforce.

During the Covid lockdown, local residents were very interested in rediscovering their localities and there was an increase in the use of paths that were close to towns and villages. Not only should efforts be made to improve the physical condition of the paths but also to promote them locally.

Statement of Action 15

15a. The Service will assess the quality and use of promoted journeys and consider rationalising them in the absence of a long-term arrangement. This work can be undertaken as part of a Categorisation review.

15b. Priority will be given to promoting access opportunities close to local communities

4.8 Biodiversity

Biodiversity and the ecosystem we live in are central to people's enjoyment of the countryside. The rights of way network, Greenways and open country allow people to enjoy and appreciate nature.

Gwynedd Council is required to maintain and enhance biodiversity in all that the Authority does in accordance with S6 of the Environment (Wales) Act 2016. Section 6 states that "A public authority must seek to protect and enhance biodiversity when exercising its functions in Wales, thereby promoting the resilience of ecosystems... "

Many of Gwynedd's lands, rivers and coast are designated for their ecological and geological importance. In addition, Gwynedd's countryside is dotted with areas supporting various species of mammals, birds, plants, reptiles and insects. Lands whether designated or not are important for wildlife and a balance must be struck between access needs and the protection of habitats and species. Care should always be taken when carrying out path improvements and upgrades as well as timing of annual maintenance to avoid disturbing nesting birds and cutting wildflowers.

Action Statement 16

16a. The Countryside Service will consider biodiversity matters when carrying out works to maintain and improve paths and will promote good practice amongst its partners.

4.9 Agri-environment schemes following Brexit

Britain's departure from the European Union requires the creation of a new framework for supporting the agricultural sector. For decades, schemes such as Tir Gofal and Glastir have contributed to improving natural habitats and restoring landscape features such as cloddiau and stonewalls. Although some landowners took the opportunity to create permissive paths there has been no direct support towards maintaining the rights of way network. There is the potential to incorporate maintaining rights of way within a new regime for subsidy payments to landowners.

DRAFT

DRAFT

Rights of Way Questionnaire

Submission Date: 2017-10-09

Authors: Research and Analytics Team

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1. Introduction

Gwynedd Council, jointly with the Snowdonia National Park Authority, intend to review and update the Rights of Way Improvement Plan (ROWIP).

The ROWIP is a strategic document to be used by Local Authorities in order to plan for the management, development and promotion of their rights of way network. The ROWIP sets a framework to identify, prioritise and plan for improvements to the rights of way network and access to the countryside for the benefit of walkers, cyclists, horse-riders, individuals with mobility problems and others.

Rights of Way include public footpaths, bridleways and byways (usually narrow lanes, often unsurfaced) but they do not include roads.

As part of the review, the service was eager to ascertain the views of the public to assist them to plan for how they could improve and maintain the Rights of Way network in Gwynedd. The responses to the questionnaire will therefore be considered when reviewing the ROWIP.

The Categorisation System

This procedure of categorising rights of way has been adopted by Gwynedd Council in order to assist to prioritise resources towards maintaining the rights of way network. The majority of the county's rights of way fall into one of four categories. Currently, the Council gives priority to paths in categories 1 and 2, namely approximately 45% of the network.

Category 1

The majority of these paths are extensively used and form links within towns, villages or between public transport facilities, car parks and attractions. They include:

- Paths and routes promoted by Gwynedd Council and the National Park including the Coast Path.
- Paths that connect urban areas or paths within urban areas.
- The Lonydd Glas network and the paths with high potential to be developed into "Active Travel" paths.

Category 2

Popular paths mainly used for recreational purposes including paths around communities, circular walks or access to open land or beaches. These include:

- Paths promoted by Gwynedd Council, the National Park and community organisations including Community Councils.
- Paths that are less likely to be suitable for development into "Active Travel" paths.

Category 3

These are paths that are rarely used, but nevertheless form links between paths in categories 1 and 2. They are paths with the potential to be used to promote walking between communities or to form a part of a route that can be promoted in the future.

Category 4

Paths without any obvious use or potential where an alternative provision of paths in higher categories is available. Usually, they do not have much potential to create useful links or form part of a promoted route. They also include paths with doubt regarding their status where it is unlikely that this will be resolved.

The questionnaire is part of preparatory work for the Rights of Way Improvement Plan review, which the Council is required to prepare in accordance with the Countryside and Access Act 2000. As part of the review, the service was eager to ascertain the views of the public to assist them to plan for how they could improve and maintain the Rights of Way network in Gwynedd. This report analyses the results of the questionnaire.

2. Methodology

In order to discover the views of Gwynedd residents on access needs to feed into the Rights of Way Improvement Plan, a questionnaire was used as a way of gathering information.

This questionnaire is based on the Wales outdoor leisure review conducted by Natural Resources Wales.

The questionnaire response period ran from 10 July to 1 September 2017.

A digital questionnaire was available on the 'Have your say' page, namely the consultation site on the Council's website, in order to gather the views of the general public.

Paper copies of the questionnaires were provided in each in every Siop Gwynedd, along with libraries and leisure centres across the county.

The consultation was promoted through the 'Have your say' page and through the Council's social media pages, namely Facebook and Twitter. The questionnaire was also promoted by Snowdonia National Park.

Responses were received through the post and through on-line questionnaires.

3. Response to the questionnaires

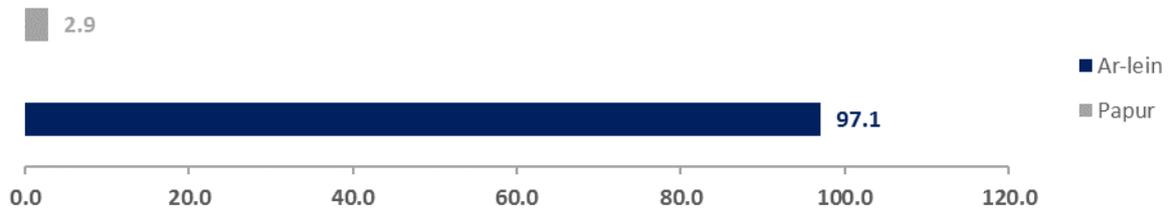
This section of the report will analyse the responses to the questionnaires.

3.01 How were the responses received?

A total of 1,386 valid responses were received to the questionnaire.

In *Graph001* you can see a breakdown of how the questionnaires were filled in. It is seen that the vast majority, namely 97.1% (Number=1,346) of the responses have been filled in on-line. Whilst the number of paper answers, 2.9% (N=40) are low in comparison.

Graph001



Your use of Rights of Way

3.02 Question 1. How often do you use rights of way for some of the activities below?

It can be seen from the table below that the most popular use made of rights of way was for walking - with almost half (43.6%) of responders noting that they walked every day, and almost one in every five (18.0%) noting that they walked twice a week. The second most popular activity was cycling - but people do this less often than walking (just over 25% do this at least once a week). The numbers who horse-ride is very low in comparison, almost 15% do this at least once a week.

Tabl001

	Daily	Twice a week	Weekly	Monthly	Occasionally	Never	No response
Walking	43.6%	18.0%	18.2%	6.8%	6.9%	2.0%	4.5%
Cycling	5.3%	9.7%	11.5%	9.7%	16.2%	18.0%	29.6%
Riding	6.3%	4.2%	4.3%	0.8%	4.6%	43.7%	36.1%
Horse and cart	0.6%	0.2%	0.6%	0.5%	2.0%	50.6%	45.4%
Other	2.4%	2.5%	2.1%	0.8%	2.3%	38.5%	51.4%

3.03 Question 2. If other – please note what activity?

Some activities being noted apart from the above were running, kayaking / canoeing and driving.

3.04 Question 3. If you have noted 'Never' for any of the above, what is your main reason/s for not using Rights of Way?

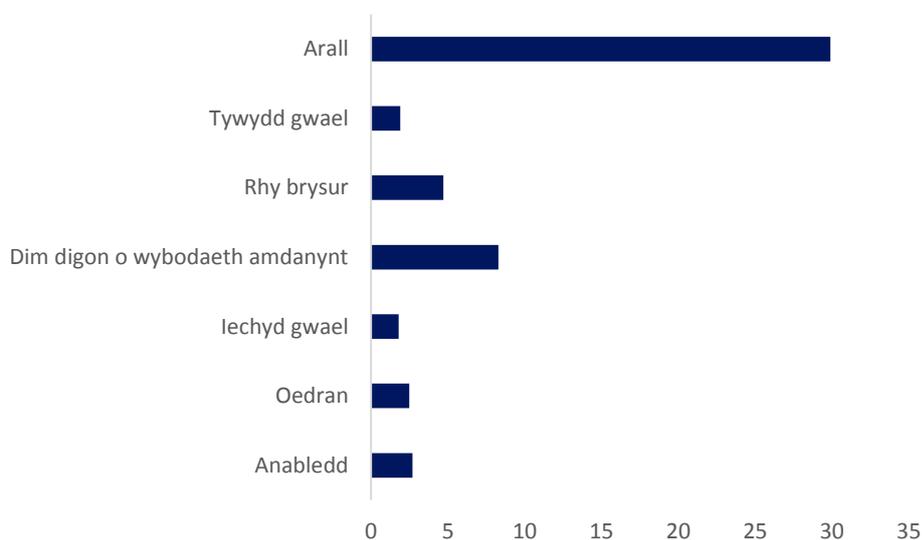
Note from the table below that the reason most people give for not using rights of way is that there is insufficient information about them (8.3%, N=115). Please see all responses in *Table002*.

Table002

	Number	Percentage
Disability	37	2.7
Age	34	2.5
Poor health	25	1.8
Insufficient information about them	115	8.3
Too busy	65	4.7

Poor weather	26	1.9
Other	415	29.9
<i>The percentages will not add to 100 as this is a multiple-choice question</i>		

For those who noted 'Other', namely 29.9% (N=415), the reason given was that they did not own a horse and cart or bicycle.



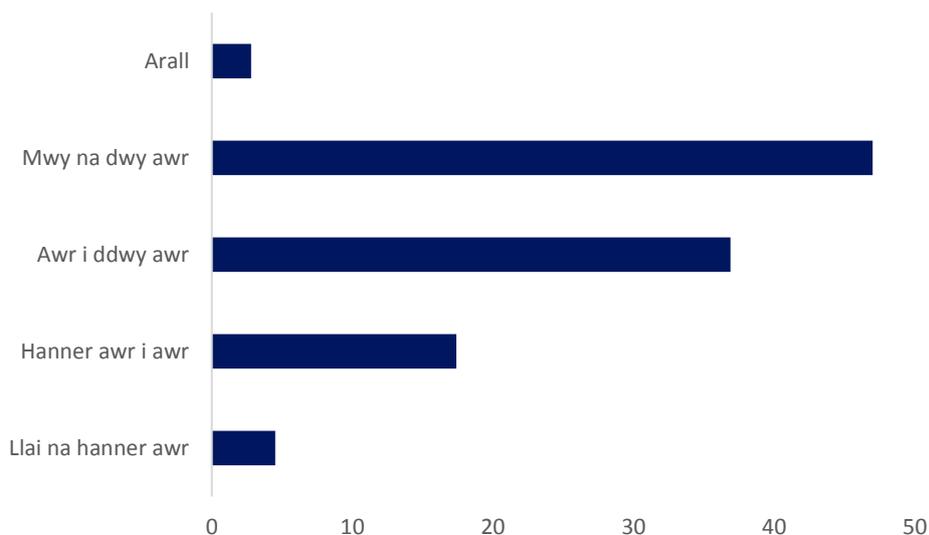
3.05 Question 4. How much time do you spend doing these activities at a time?

The most common answer to this question was 'more than two hours' with almost half (47.0%, N=652) of the responders noting this. Just over a third of the responders (36.9%, N=512) noted that they did the activities for an hour to two hours, with almost one in every five responders (17.4%, N=241) noting that they did the activities for half an hour to an hour.

Table003

	Number	Percentage
Less than half an hour	62	4.5
Half an hour to an hour	241	17.4
An hour to two hours	512	36.9
More than two hours	652	47.0
Other	39	2.8
<i>The percentages will not add to 100 as this is a multiple-choice question</i>		

Of those who had noted 'other' the answers varied from noting that they did activities throughout the day to noting that the times they did activities varied, dependent on the activity and the situation.



3.06 Question 5. What's your main reasons for using a Right of Way?

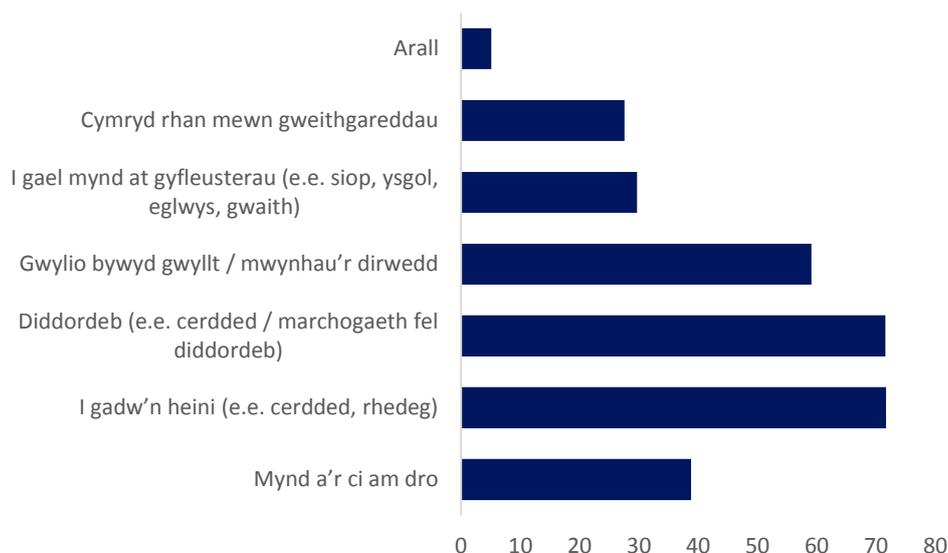
Note that almost three-quarters of the responders used rights of way to keep fit (71.7%, N=994) and because of their interests (71.6%, N=993). A large number also use them to watch wildlife / enjoy the landscape (59.1%, N=819).

Table004

	Number	Percentage
Taking the dog for a walk	538	38.8
To keep fit (e.g. walking, running)	994	71.7
Interests (e.g. walking / horse-riding as an interest)	993	71.6
Watching wildlife / enjoying the landscape	819	59.1
To access facilities (e.g. shop, school, church, work)	412	29.7
Taking part in activities	382	27.6
Other	71	5.1
Total		
<i>The percentages will not add to 100 as this is a multiple-choice question</i>		

Of those who noted 'other', the reasons included things such as working / going to work and to avoid roads.

Graph003



3.07 Question 6. Which of these methods of going to the countryside do you prefer?

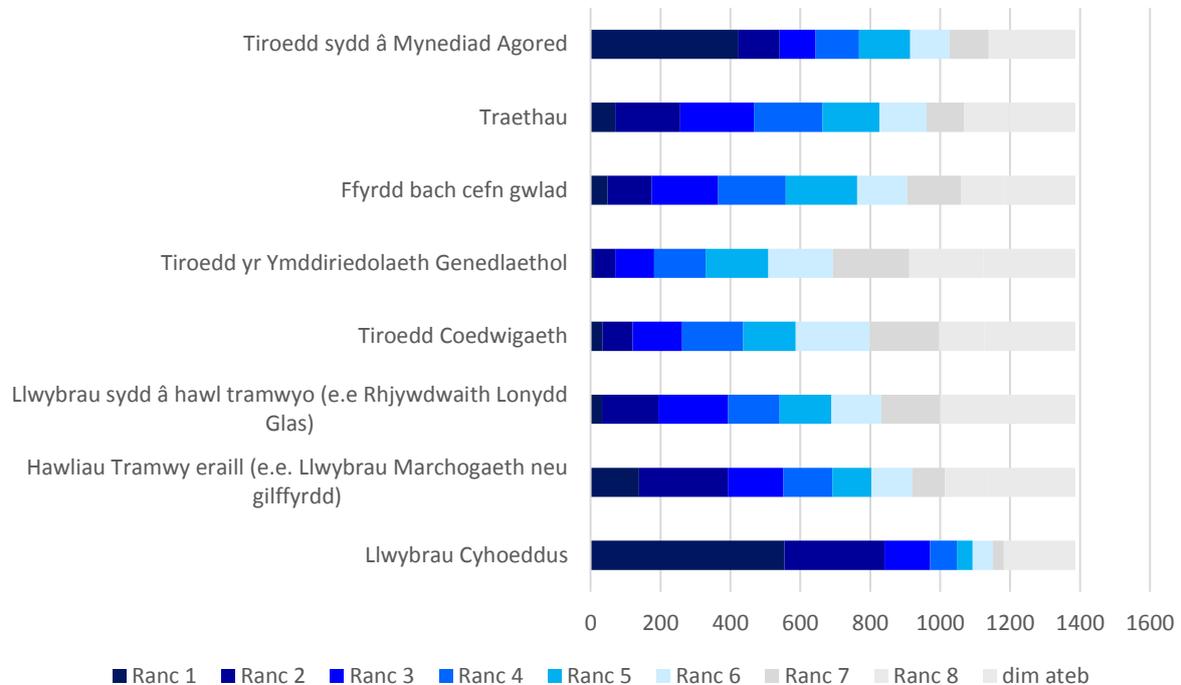
This question asked responders to rank the methods from 1 to 8. Note that the methods ranked highest are public paths and lands with open access. Those ranking lowest are the lands of the national trust, beaches and forestry lands.

Table005

	Rank 1	Rank 2	Rank 3	Rank 4	Rank 5	Rank 6	Rank 7	Rank 8
Public Footpaths	555 (40.0)	286 (20.6)	130 (9.4)	77 (5.6)	45 (3.2)	58 (4.2)	31 (2.2)	41 (3.0)
Other Rights of Way (e.g. Bridleways or Byways)	139 (10.0)	254 (18.3)	159 (11.5)	140 (10.1)	111 (8.0)	117 (8.4)	94 (6.8)	122 (8.8)
Paths with a right of way (e.g. Lonydd Glas Network)	33 (2.4)	161 (11.6)	200 (14.4)	147 (10.6)	148 (10.7)	143 (10.3)	168 (12.1)	128 (9.2)
Forestry Lands	35 (2.5)	85 (6.1)	142 (10.2)	175 (12.6)	150 (10.8)	212 (15.3)	198 (14.3)	129 (9.3)
National Trust Lands	10 (0.7)	61 (4.4)	111 (8.0)	147 (10.6)	180 (13.0)	185 (13.3)	218 (15.7)	212 (15.3)
Small rural lanes	49 (3.5)	126 (9.1)	190 (13.7)	193 (13.9)	205 (14.8)	143 (10.3)	155 (11.2)	123 (8.9)
Beaches	71 (5.1)	186 (13.4)	210 (15.2)	196 (14.1)	163 (11.8)	135 (9.7)	107 (7.7)	131 (9.5)

Lands with Open Access	421 (30.4)	120 (8.7)	103 (7.4)	124 (8.9)	146 (10.5)	113 (8.2)	112 (8.1)	104 (7.5)
<i>The percentages will not add up to 100 as this is a multiple-choice question</i>								

Graph004



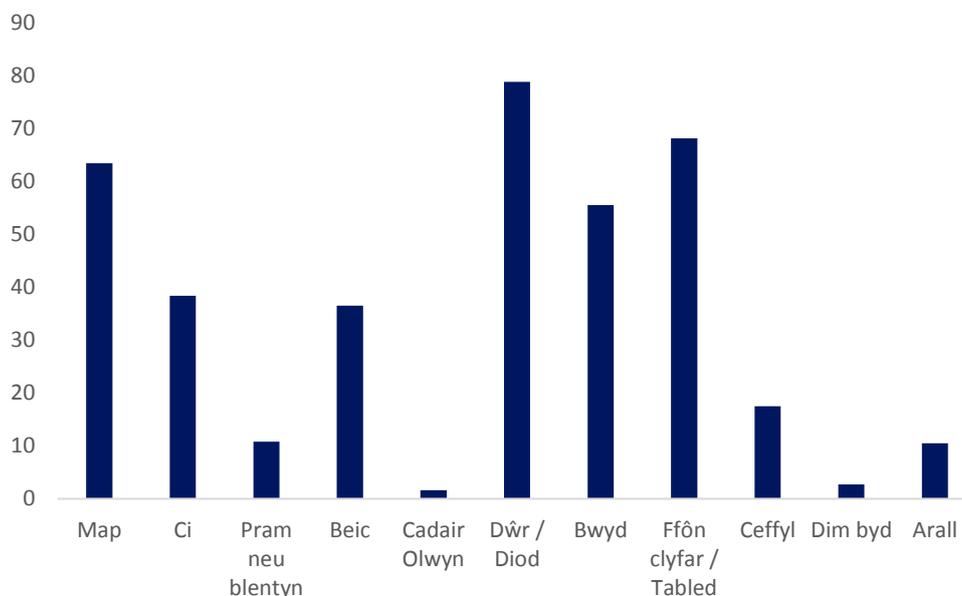
3.08 Question 7. If you use Rights of Way, which of the following would you take with you/use?

Note from the table below that the things that people were most likely to take with them when using rights of way were water/a drink (78.8%, N=1,092), a smart phone or tablet (68.1%, N=94\$) and a map (63.4%, N=879). A small number noted that they would take a wheelchair (1.6%, N=22). Some of the 'other' answers included suitable clothing, binoculars and a compass.

Table006

	Number	Percentage
Map	879	63.4
A dog	532	38.4
A pram or child	149	10.8
Bicycle	506	36.5
Wheelchair	22	1.6
Water / A drink	1092	78.8
Food	769	55.5
Smart phone / tablet	944	68.1
Horse	242	17.5
Nothing	38	2.7
Other	146	10.5
<i>The percentages will not add to 100 as this is a multiple-choice question</i>		

Graph005



3.09 Question 8. Have you come across any problems when using rights of way in Gwynedd?

Over half (61.2%, N=848) of the responders have come across problems when using rights of way in Gwynedd.

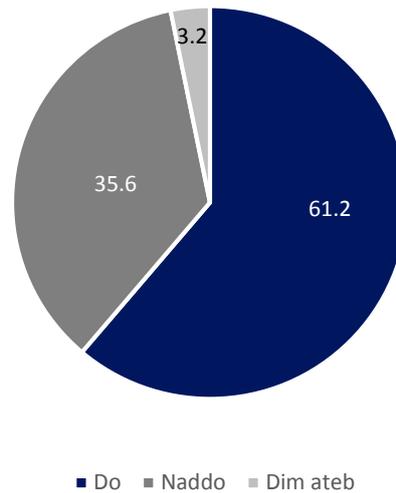
Table007

	Number	Percentage
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12

Yes	848	61.2
No	493	35.6
No response	45	3.2
Total	1386	100%

Graph006



3.10 Question 9. Have you come across the problems below whilst using rights of way in Gwynedd?

Those who answered 'Yes' in question 8 were asked to respond to this question.

The reasons most often noted as serious problems, namely a score of 5, was path intentionally obstructed (36.6%, N=261), lack of signage or misleading signage (29.3%, N=216), and overgrowth / fallen trees (28.0%, N=215).

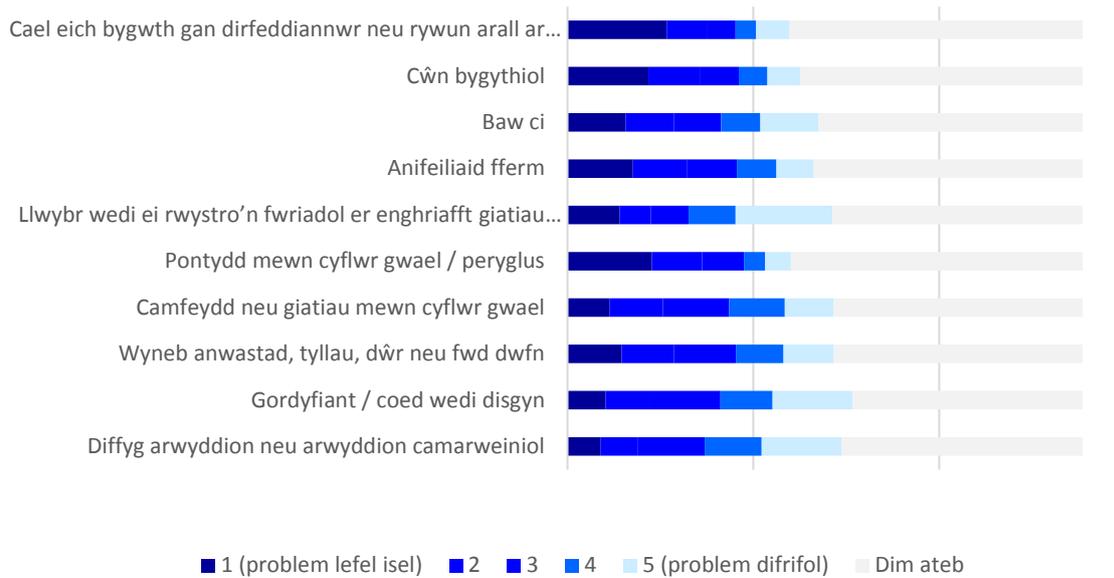
The ones that were low level problems to the responders were being threatened by landowners or others on the path (44.6%, N=267), bridges in poor/ dangerous condition (37.8%, N=227), and threatening dogs (34.8%, N=218).

Table008

	1 (low level problem)	2	3	4	5 (serious problem)
Lack of signage or misleading signage	90 (12.2%)	98 (13.3%)	181 (24.5%)	153 (20.7%)	216 (29.3%)

Overgrown / fallen trees	103 (13.4%)	117 (15.3%)	192 (25.0%)	140 (18.3%)	215 (28.0%)
Uneven surface, holes, deep water or mud	146 (20.4%)	141 (19.7%)	166 (23.2%)	128 (17.9%)	135 (18.9%)
Stiles or gates in a poor condition	113 (15.8%)	144 (20.1%)	178 (24.9%)	150 (20.9%)	131 (18.3%)
Bridges in poor / dangerous condition	227 (37.8%)	135 (22.5%)	113 (18.8%)	57 (9.5%)	69 (11.5%)
Path intentionally obstructed e.g. locked gates or a fence across the path	141 (19.8%)	84 (11.8%)	101 (14.2%)	126 (17.7%)	261 (36.6%)
Farm animals	176 (26.5%)	146 (22.0%)	134 (20.2%)	106 (16.0%)	101 (15.2%)
Dog fouling	156 (23.1%)	131 (19.4%)	126 (18.7%)	106 (15.7%)	156 (23.1%)
Threatening dogs	218 (34.8%)	140 (22.3%)	103 (16.4%)	77 (12.3%)	89 (14.2%)
Being threatened by a landowner or by someone else on the path	267 (44.6%)	110 (18.4%)	75 (12.5%)	56 (9.4%)	90 (15.1%)

Graph007



3.11 Question 10. Note below if you have any further observations on the problems you have encountered when using rights of way.

Those who had answered 'Yes' in question 8 were asked to respond to this question.

Some of the matters arising were blocked / closed paths, overgrown paths, lack of wheelchair access, lack of signage / path unclear, rubbish.

Your views

3.12 Question 11. What type of paths are most important to you?

Rate their importance from 1 to 5, where '1' equates to your most important and '5' equates to your least important.

Those who had answered 'Yes' in question 8 were asked to respond to this question.

Note from the table below that the type of paths that are most important to the responders are circular routes (43.5%, N=311) and local journeys in my area (42.0%, N=303). The type of paths that were least important to people were paths from one place to another (24.7%, N=168) and long-distance journeys (16.6%, N=113).

Table009

	1	2	3	4	5
Long-distance journeys	178 (26.1%)	112 (16.4%)	152 (22.3%)	126 (18.5%)	113 (16.6%)
Paths from one place to another (A to B)	169 (24.7%)	129 (18.9%)	173 (25.3%)	108 (15.8%)	104 (15.2%)
Circular Paths	311 (43.5%)	106 (14.8%)	93 (13.0%)	75 (10.5%)	130 (18.2%)
Themed journeys or journeys from a leaflet	120 (18.8%)	118 (18.5%)	166 (26.0%)	125 (19.6%)	110 (17.2%)
Local journey in my area	303 (42.0%)	116 (16.1%)	88 (12.2%)	64 (8.9%)	150 (20.8%)
Accessible paths	238 (35.2%)	99 (14.6%)	120 (17.7%)	67 (9.9%)	153 (22.6%)

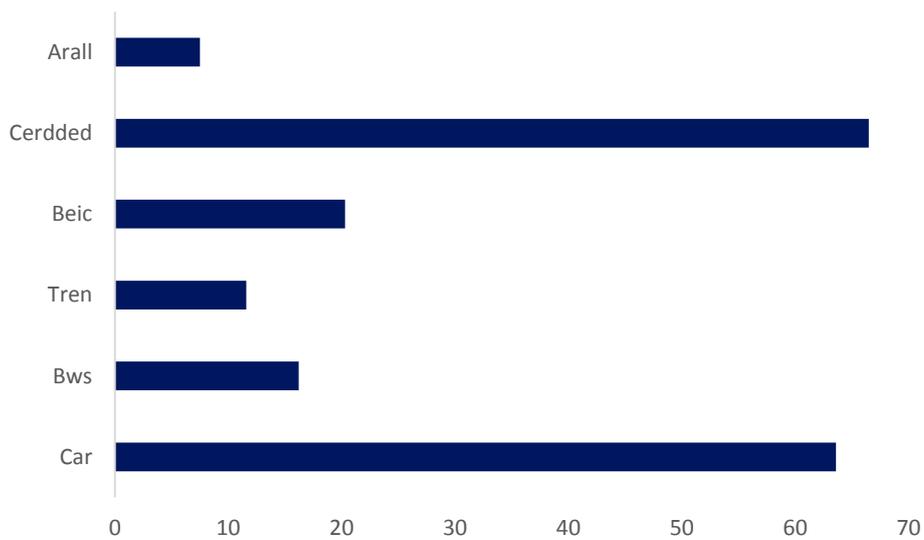
3.13 Question 12. How would you reach the walking path?

Note that the majority of responders reach the walking path either by walking (66.5%, N=922), or by using a car (63.6%, N=881).

Table010

	Number	Percentage
Car	881	63.6
Bus	225	16.2
Train	161	11.6
Bicycle	281	20.3
Walking	922	66.5
Other	104	7.5

Graph008



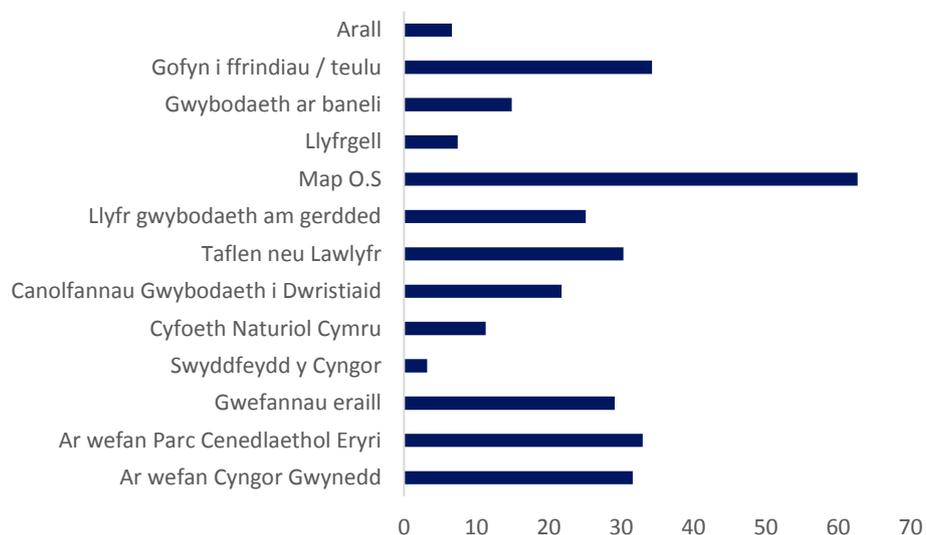
3.14 Question 13. Where would you search for information about Rights of Way?

The majority of responders noted that they would search for information about rights of way on an OS map (62.7%, N=869). Some of the other most common answers were asking friends / family (34.3%, N=476), on Snowdonia National Park's website (33.0%, N=457), and on Gwynedd Council's website (31.6%, N=438).

Table011

	Number	Percentage
On Gwynedd Council's website	438	31.6
On Snowdonia National Park's website	457	33.0
Other websites	404	29.1
Council Offices	44	3.2
Natural Resources Wales	157	11.3
Tourist Information Centres	302	21.8
Leaflet or Handbook	420	30.3
Walking guide book	348	25.1
O.S. Map	869	62.7
Library	102	7.4
Information on panels	207	14.9
Asking friends / family	476	34.3

Graph009



3.15 Question 14. What information about Rights of Way is most important to you?

The information about rights of way that is most important to the responders is general information about public footpaths, their use and general countryside (17.5%, N=243). A high number also rank the exact location of the starting point of paths as an important factor (16.6%, N=230). There was not much difference in the other categories, except that a number had ranked specific legal rights as less important (18.5%, N=256).

Table012

| Rank |
|------|------|------|------|------|------|------|------|------|------|------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | |

General information about public footpaths, their use and general countryside	243 (17.5%)	157 (11.3%)	96 (6.9%)	90 (6.5%)	83 (6.0%)	73 (5.3%)	69 (5.0%)	50 (3.6%)	67 (4.8%)	64 (4.6%)
Specific legal rights	66 (4.8%)	96 (6.9%)	49 (3.5%)	55 (4.0%)	52 (3.8%)	63 (4.5%)	75 (5.4%)	81 (5.8%)	107 (7.7%)	256 (18.5%)
Exact location of the starting point of paths	230 (16.6%)	212 (15.3%)	147 (10.6%)	126 (9.1%)	80 (5.8%)	78 (5.6%)	44 (3.2%)	39 (2.8%)	29 (2.1%)	17 (1.2%)
Journeys from specific locations and their distance	81 (5.8%)	151 (10.9%)	166 (12.0%)	131 (9.5%)	145 (10.5%)	98 (7.1%)	78 (5.6%)	53 (3.8%)	49 (3.5%)	16 (1.2%)
Paths marked with panels	65 (4.7%)	118 (8.5%)	128 (9.2%)	118 (8.5%)	127 (9.2%)	125 (9.0%)	94 (6.8%)	78 (5.6%)	71 (5.1%)	30 (2.2%)
Pamphlets about paths	25 (1.8%)	56 (4.0%)	94 (6.8%)	116 (8.4%)	106 (7.6%)	119 (8.6%)	117 (8.4%)	129 (9.3%)	109 (7.9%)	59 (4.3%)
The suitability of paths for different needs	77 (5.6%)	90 (6.5%)	103 (7.4%)	76 (5.5%)	78 (5.6%)	96 (6.9%)	127 (9.2%)	115 (8.3%)	117 (8.4%)	67 (4.8%)
Number and types of gates and stiles	17 (1.2%)	49 (3.5%)	70 (5.1%)	79 (5.7%)	65 (4.7%)	80 (5.8%)	99 (7.1%)	161 (11.6%)	167 (12.0%)	117 (8.4%)
Traffic and access to paths	39 (2.8%)	95 (6.9%)	106 (7.6%)	108 (7.8%)	125 (9.0%)	108 (7.8%)	111 (8.0%)	100 (7.2%)	80 (5.8%)	72 (5.2%)
Facilities nearby (toilets, car parks, refreshments)	312 (22.5%)	64 (4.6%)	82 (5.9%)	84 (6.1%)	89 (6.4%)	82 (5.9%)	86 (6.2%)	78 (5.6%)	80 (5.8%)	91 (6.6%)
<i>The percentages will not add to 100 as this is a multiple-choice question</i>										

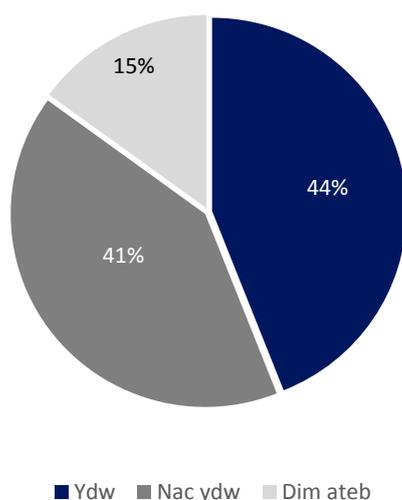
3.16 Question 15. Do you believe that the existing rights of way network is suitable and meets the needs of the majority of users?

These answers were relatively equal, with a slightly higher percentage, 44.0% (N=610) noting that existing rights of way were suitable, and 41.0% (N=568) noting that they did not believe that they were suitable.

Table013

	Number	Percentage
Yes	610	44.0
No	568	41.0
No response	208	15.0
Total	1386	100%

Graph010



3.17 Question 16. What do you believe are the main steps that should be taken to improve the network?

Those who had answered 'No' in question 15 were asked to respond to this question.

A higher percentage agreed with the observations that more land should be designated as open land, and that legislation should be changed to make it easier for Local Authorities to create, abolish or divert rights of way. A high percentage of the responders strongly disagreed with the statement that

there were too many paths, the majority of them are not used and the popular paths should be focussed on (16.6%, N=230).

Table014

	Strongly agree	Good idea but not a high priority	No specific opinion	Disagree, not a priority	Strongly disagree
There are too many paths, the majority of them are not used and the popular paths should be focussed on	39 (2.8%)	57 (4.1%)	80 (5.8%)	109 (7.9%)	230 (16.6%)
More cycling paths are needed	237 (17.1%)	115 (8.3%)	88 (6.3%)	37 (2.7%)	50 (3.6%)
More horse-riding paths are needed	204 (14.7%)	60 (4.3%)	158 (11.4%)	61 (4.4%)	52 (3.8%)
Need for more paths that area suitable for wheelchairs	174 (12.6%)	137 (9.9%)	174 (12.6%)	15 (1.1%)	15 (1.1%)
Cyclists and horses should be approved on the majority of footpaths	253 (18.3%)	75 (5.4%)	48 (3.5%)	73 (5.3%)	93 (6.7%)
The legislation should be changed to make it easier for Local Authorities to create, abolish or divert rights of way, e.g. move a path away from a farmyard or create a new section of the Coast Path.	260 (18.8%)	133 (9.6%)	64 (4.6%)	32 (2.3%)	51 (3.7%)

More land should be designated as open land	315 (22.7%)	112 (8.1%)	65 (4.7%)	26 (1.9%)	23 (1.7%)
Tourists and tourism businesses should contribute towards maintaining rights of way	184 (13.3%)	152 (11.0%)	105 (7.6%)	41 (3.0%)	54 (3.9%)

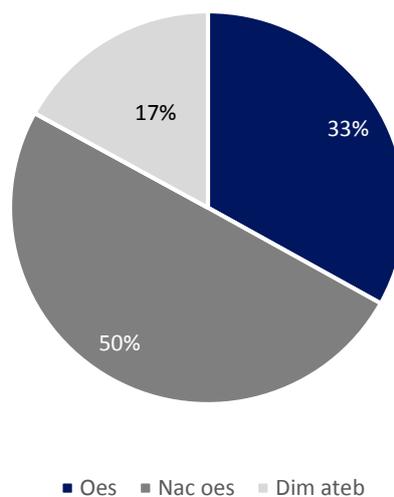
3.18 Question 17. Are there specific areas or locations where more paths are needed or change the status of a path to allow for multi-use?

The majority of responders noted that there were no specific areas or locations where more paths were needed or for the status of paths to be changed to allow for their use (49.9%, N=692).

Table015

	Number	Percentage
Yes	459	33.1
No	692	49.9
No response	235	17.0
Total	1386	100%

Graph011



3.19 Question 18. Provide a brief description and explain the benefit to users.

Those who had answered 'Yes' in question 17 were asked to answer this question.

The type of emerging themes in the responses to the question was to have more multi-use paths and more horse-riding and cycling paths, with many responders giving specific examples of where new paths could be created or to change paths that currently exist.

Your views of Rights of Way

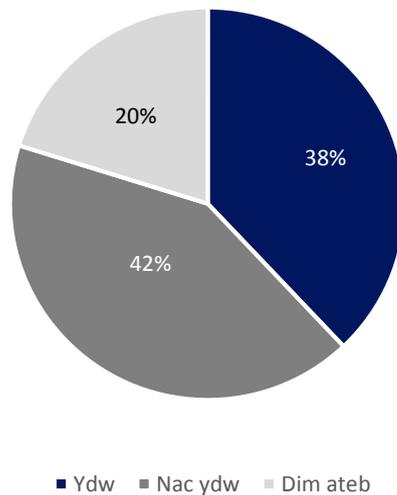
3.20 Question 19. Do you know what the 'Definitive Map' is?

Note that the majority of responders do not know what the 'definitive map' is (41.8%, N=580).

Table016

	Number	Percentage
Yes	526	38.0
No	580	41.8
No response	280	20.2
Total	1386	100%

Graph012



3.21 Question 20. Have you ever looked at Gwynedd's Definitive Map?

Those who had answered 'Yes' in question 19 were asked to answer this question.

Of those who knew what the definitive map was, 44.4% (N=232) of them had looked at Gwynedd's definitive map.

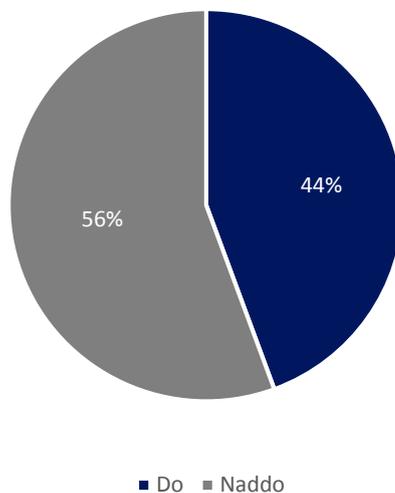
Table017

	Number	Percentage
Yes	232	44.4
No	291	55.6

24

Total	523	100%
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Graph013



3.22 Question 21. Did you get a satisfactory answer from looking at it?

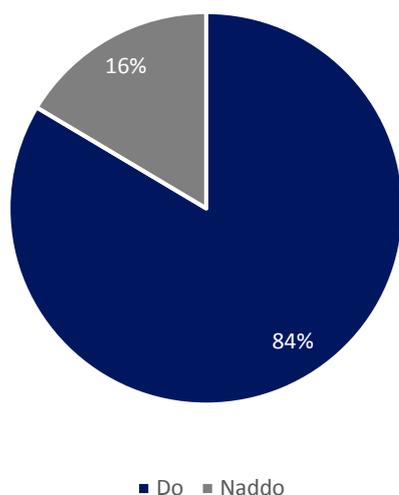
Those who had answered 'Yes' in question 20 were asked to answer this question.

Of those who knew of the definitive map, and had looked at Gwynedd's definitive map, 83.6% (N=189) had obtained a satisfactory answer from looking at it.

Table018

	Number	Percentage
Yes	189	83.6
No	37	16.4
Total	226	100%

Graph014



3.23 Question 22. What was the main problem?

Those who had answered 'No' in question 21 were asked to answer this question.

Of those who had said that they had not obtained a satisfactory answer from it, the observations included points such as it was difficult to understand, not up-to-date, and that a larger scale map was needed.

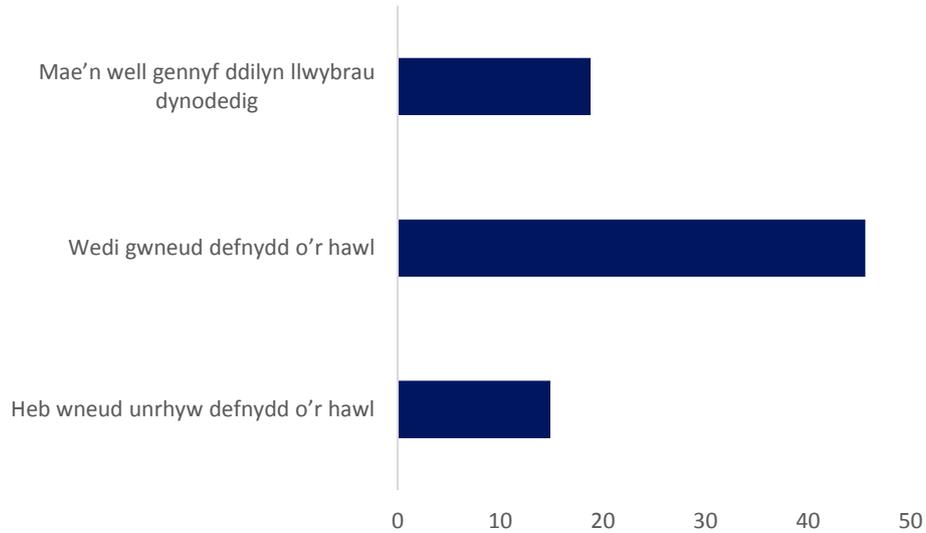
3.24 Question 23. Parts of Gwynedd have been designated as Open Access land (mainly mountain land and highlands). Since that designation in 2005, have you used it?

Note that almost half (45.6%, N=632) of the responders have made use of the open access land right. Almost one in every five responders (18.8%, N=260) have said that they prefer to follow designated paths, whilst 14.9% (N=206) of the responders have said that they have not made any use of the right.

Table019

	Number	Percentage
Have not made any use of the right	206	14.9
Have made use of the right	632	45.6
I prefer to follow designated paths	260	18.8
No response	288	20.8
Total	1386	100%

Graph015



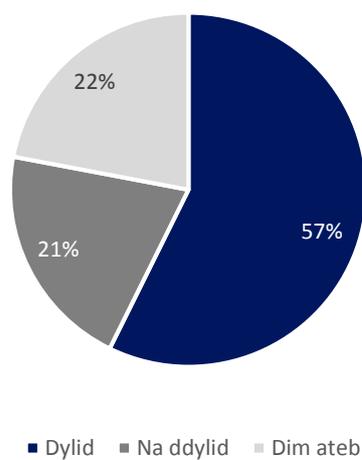
3.25 Question 24. Should more land be designated as Open Access Land?

The majority of the responders (57.3%, N=794), note that more land should be designated as open access land.

Table020

	Number	Percentage
Yes	794	57.3
No	287	20.7
No response	305	22.0
Total	1386	100%

Graph016



3.26 Question 25. Over recent years, Gwynedd Council and the National Park have faced cuts to their budgets for maintaining and improving rights of way. How would you like to see the two bodies prioritising resources over the coming years?

Note below that the most popular options for future priorities is prioritising work on the definitive map and applications to amend the map (21.8%, N=302) and maintaining every path on the definitive map as required and not prioritise work in accordance with the categorisation procedure (17.5%, N=243). The two least favoured options are maintaining paths within Category 1 only (24.9%, N=345) and maintaining paths within categories 1 and 2 only.

Table021

	Rank 1	Rank 2	Rank 3	Rank 4	Rank 5	Rank 6	Rank 7	Rank 8	Rank 9	Rank 10
Maintain paths within Category 1 only	29 (2.1%)	31 (2.2%)	32 (2.3%)	27 (1.9%)	40 (2.9%)	23 (1.7%)	40 (2.9%)	56 (4.0%)	95 (6.9%)	345 (24.9%)
Maintain paths within Categories 1 and 2 only	59 (4.3%)	60 (4.3%)	49 (3.5%)	48 (3.5%)	52 (3.8%)	55 (4.0%)	57 (4.1%)	96 (6.9%)	276 (19.9%)	27 (1.9%)
Maintain every path on the definitive map as needed and not prioritise work in accordance with the categorisation procedure	243 (17.5%)	162 (11.7%)	108 (7.8%)	77 (5.6%)	70 (5.1%)	59 (4.3%)	48 (3.5%)	56 (4.0%)	34 (2.5%)	22 (1.6%)
Resources should be prioritised for promoted paths and paths that attract visitors to the area,	78 (5.6%)	117 (8.4%)	100 (7.2%)	98 (7.1%)	76 (5.5%)	69 (5.0%)	95 (6.9%)	120 (8.7%)	37 (2.7%)	31 (2.2%)

e.g. Coastal Paths, Snowdon paths, National Park's recreational paths, Lonydd Glas and local circular routes										
Make use of existing paths to establish more circular paths and long promoted journeys	119 (8.6%)	208 (15.0%)	128 (9.2%)	102 (7.4%)	89 (6.4%)	65 (4.7%)	61 (4.4%)	47 (3.4%)	24 (1.7%)	9 (0.6%)
Priority should be given to resolving conflict and problems by collaborating with landowners and users	25 (1.8%)	50 (3.6%)	94 (6.8%)	92 (6.6%)	95 (6.9%)	100 (7.2%)	122 (8.8%)	91 (6.6%)	68 (4.9%)	55 (4.0%)
More resources should be given to Community and Town councils or voluntary organisations to enable us to maintain the rights of way network	85 (6.1%)	115 (8.3%)	119 (8.6%)	124 (8.9%)	93 (6.7%)	95 (6.9%)	76 (5.5%)	62 (4.5%)	35 (2.5%)	30 (2.2%)

More emphasis should be placed on enforcement work to maintain and open rights of way which will lead to taking legal action against landowners	51 (3.7%)	82 (5.9%)	98 (7.1%)	96 (6.9%)	95 (6.9%)	91 (6.6%)	95 (6.9%)	71 (5.1%)	61 (4.4%)	76 (5.5%)
The definitive map and other Information about the network should be available on the Council's website	42 (3.0%)	104 (7.5%)	134 (9.7%)	123 (8.9%)	117 (8.4%)	108 (7.8%)	75 (5.4%)	63 (4.5%)	42 (3.0%)	24 (1.7%)
Prioritise the work on the definitive map and applications to amend the map (change the status of a path, register unrecorded paths)	302 (21.8%)	34 (2.5%)	43 (3.1%)	63 (4.5%)	76 (5.5%)	106 (7.6%)	82 (5.9%)	77 (5.6%)	58 (4.2%)	51 (3.7%)
<i>The percentages will not add to 100 as this is a multiple-choice question</i>										

3.27 Question 26. To close, if you have any questions or additional observations about this questionnaire or about rights of way and countryside access in Gwynedd, please note them below.

Here are some of the main themes emerging in response to the above question.

30

A high number of the answers emphasised the importance of the paths. The responders referred to the use they and local residents made of the paths. A number of the responders were also eager to note that a number of tourists used the paths and visited the area specifically as a result. A number said that the maintenance of paths should be a priority for Gwynedd Council and that more, not less, should be done. A number of responders also praised a specific path or paths. A small number criticised a specific path or paths.

Another common response to this question was criticism of the questionnaire. A number had found it difficult to fill in, in particular the questions where there was a need to prioritise. Others believed that some questions were too closed and others said that a "don't know" option was needed for some of the questions.

A number of responders proposed that volunteers could help with the work of path maintenance. Some proposed that Gwynedd Council could provide training in this respect.

A number believed that more needed to be done to promote the Gwynedd paths network by means of pamphlets and the website. A small number of responders proposed that a complete open source Map of the network was required.

Cyclists proposed that they needed a better provision. Those who were not cyclists said that cycle paths were important so that bicycles were kept off the main road as this could be dangerous.

Those who were horse-riders said that they needed a better provision and paths were cars were not present.

Some responses stated that rights of way were essential in order to encourage more people to travel in more sustainable ways.

A few responses said that steps needed to be taken to prevent vehicles from destructing paths.

A number of responses were complaining that there was a lack of signage on the paths.

A few responses said that there needed to be a way to discover whether or not a path led to farmland, this was very important for dog owners.

Some responses said that they had contacted the Council regarding paths in the past and that they had not received a response. Other responses praised the service provided by the Council.

Some responders suggested lobbying Welsh Government to shoulder some of the financial responsibility for the maintenance of the network.

The report was prepared by

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Appendix 1**Table of actions identified in the 2007 ROWIP that could be carried out with current resources.**

Reference	Action proposal	Comment
2/3	Produce Consolidated Map – consolidate changes from existing Definitive map onto a new map, with a new relevant date.	Not delivered due to lack of staff resources
2/4	Work towards producing an up-to-date electronic version of the working Definitive Map *	Completed in 2013 The map is available on the Councils in house mapping system but not on the external website
2/5	Clear backlog of applications for Definitive Map Modification Orders*	Target not reached due to loss of staff and amount of new applications some of which have been extremely complicated.
3/1	Develop a robust policy for enforcement action/prosecutions	Completed 2012. Policies will be reviewed as part of the ROWIP review.
3/2	Produce a range of clear policies on the management of right of way	Completed 2012. Policies will be reviewed as part of the ROWIP review.
3/5	Produce a guide for protection and enforcement purposes using Cheshire County Council's example as a model of good practice.	Not delivered, draft prepared. The guide will be reviewed as part of ROWIP review
3/6	Negotiate a Formal Agreement with SNPA to establish a more integrated working approach	Discussions have resulted in establishing / agreement on principles for greater collaborative working to be implemented during 2017
3/7	Encourage partnership working with other Council departments, community councils and other agencies.	Majority of Town and Community Councils have participated in the footpath maintenance arrangement which was reviewed in 2016 following reduction in the footpath maintenance budget.

		Structural changes since 2007 have assisted partnership working within the Council.
4/3	Liaise with landowners + managers to minimise conflict – arrange and host workshops with landowners to discuss issues that affect landowners.	On-going and regular contact and discussions with landowners occur on specific paths and issues.
4/6	Disability training for ROW officers – ensure that staff training is up to date regarding disability equality.	All staff have attended training to address the need disabled users and equality.
4/7	Engage with various user and disability groups – consult with representatives to help identify potential routes.	On-going contact with disability groups on specific paths and issues.
5/4	Integration with Safe Routes to School/work – determine which specific paths are used for school and work commuting and identify potential improvements.	The Active Travel Act has superseded many of the initiatives happening in 2007.
6/6	Examine existing promoted routes – undertake a review of the promoted routes and explore potential links and extensions	Work to improve and develop promoted routes has taken place; however, since 2008 the emphasis has been on establishing and developing the Coast Path.
6/3	Identify further health walks – explore new/alternative routes to ensure that public rights of way and access help to deliver health benefits.	The health walks initiative was supported but, since 2007 have been replaced new initiatives / legislation such as Active Travel.
6/5	Develop a quality interactive website – review, amend/re-arrange and maintain existing website to promote access and the work of the Countryside and Access Unit.	Rights of way and the highways network have been made available on the Gwynedd website. The map includes a function that allows the public to contact the Countryside Service with enquires and complaints.

Committee	COMMUNITIES SCRUTINY COMMITTEE
Date	25 February 2021
Title	Supplementary Planning Guidance: Tourist Facilities and Accommodation (consultation report)
Cabinet Member	Councillor Gareth W Griffith
Author	Gareth Jones – Assistant Head, Environment Department
Purpose	To raise awareness regarding the Supplementary Planning Guidance: Tourist facilities and accommodation (post public consultation draft) and give an opportunity for the Committee to offer feedback before it is considered by the Joint Planning Policy Committee.

1. BACKGROUND

1.1 The purpose of this report is to raise the awareness of Scrutiny Committee Members of the development of the Supplementary Planning Guidance: 'Tourist Facilities and Accommodation' along with the relevant Consultation Report and ensure that they are scrutinised by this Committee prior to the determination on its suitability for adoption by the Joint Planning Policy Committee at its meeting on 12 March 2021. The Communities and Regeneration Scrutiny Committee (Isle of Anglesey County Council) have scrutinised the document on 9 February 2021.

1.2 The draft Guidance was previously presented to the Communities Scrutiny Committee (4 April, 2019) in light of concerns expressed in relation to the need to take account of the cumulative impact of touring caravan sites. Following that meeting the Guidance has been further amended to address this concern (see para 6.2.1 at Annex 2).

2. PURPOSE

2.2 The Guidance offers direction in relation to the tourism policies included within the Joint Local Development Plan including guidance in terms of policies in connection to permanent holiday accommodation, static and touring caravan sites.

2.1 Supplementary Planning Guidance can only deal with the provision of further information or details regarding policies or proposals noted in the Local Development Plan.

2.3 Guidance cannot change a policy or proposals noted in the Local Development Plan and no new policies can be introduced via Supplementary Planning Guidance.

2.2 Guidance can be a 'material planning consideration' that should receive due attention in conjunction with the policies it supports in the Local Development Plan when specific activities have taken place. Figure 1 provides a snapshot of the actions that are necessary for Guidance to be given 'material planning consideration' status.

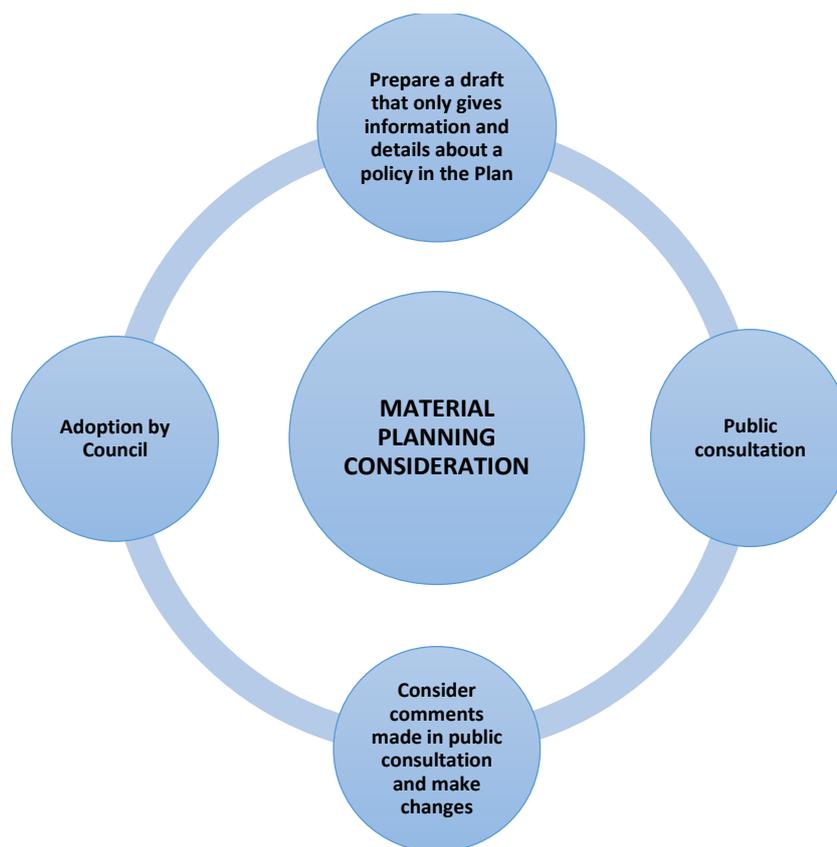


Figure 1: Actions to prepare Supplementary Planning Guidance

3.0 PREPARING SPG: TOURISM FACILITIES AND ACCOMMODATION

3.1 During the process of preparing the Guidance in question, the Joint Local Development Plan Panel has been part of scrutinising the contents. Having received consideration from the Joint Local Development Plan Panel the Guidance received the seal of approval of the Joint Planning Policy Committee for release for a public consultation period. Following this original public consultation period (spring 2018) and as a result of the comments received, it was considered appropriate to undertake further amendments to the Guidance in relation to two specific matters, namely:-

1. How to define an overprovision of self-service accommodation, and;
2. How to deal with applications for change of use of and loss of hotels.

3.2 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.

3.3 During the Joint Local Development Plan Panel meeting 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 consultation period, and a request was made to submit the Guidance to a meeting of the Joint Planning Policy Committee for adoption.

- 3.4 Since the meeting of the Joint Planning Policy Committee (March 2019), the guidance has been submitted to Gwynedd Council's Communities Scrutiny Committee on 4 April 2019. As a result of the discussion at this meeting, it was considered that it would be appropriate to make a minor amendment to the wording of the Guidance. Furthermore, a recent appeal decision in relation to considerations linked to assessing 'over-provision' of holiday accommodation has highlighted the need to further amend the Guidance.
- 3.5 A draft version of this 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.
- 3.6 The SPG was subject to a public consultation from 16 October to 27 November 2020.
- 3.7 It is noted that the main amendment to the Guidance that led to the third consultation period related to undertaking a further amendment of the definition linked to the over-provision of holiday accommodation. By now, the definition (see section 4.6 of the Guidance in Appendix 2) includes a specific threshold in terms of when there is an over-provision of self-catering holiday accommodation within a specific area. In accordance with the amended direction within the Guidance, favourable consideration will not be given to applications for self-catering holiday accommodation when a combination of holiday accommodation and second homes have already reached the threshold of 15% of all the housing stock. It is considered that setting 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.
- 3.8 Details of the public consultation were placed on the websites of both Councils and e-mails/letters were sent to all Councillors, Community Councils, planning agents, statutory consultees, environmental bodies, neighbouring authorities and those who had expressed an interest in the SPG.
- 3.9 There were a number of different ways to respond to the consultation, including:
- On-line Response Form in Word and pdf. Paper copies of the response form were also available on request from the Joint PPU.
 - E-mails; and Letter
- 3.10 A total of 15 valid comments were received. Detailed consideration was given to every comment received. Furthermore, it is noted that 8 invalid comments were received (see the second table in appendix 1). Since these comments related to sections of the document that were not subject to the public consultation process, no further consideration has been given to these.
- 3.11 The following section (Appendix 1) summarises the comments received, and includes the responses of the Councils to them and when appropriate, recommend any modifications required to the SPG as a result of the comment. Any modification to the wording of the SPG has been noted in **bold, underlined font**.
- 3.12 The complete Guidance can be seen in post public consultation draft format in **Appendix 2**.

3.13 When it is adopted the Guidance will replace the current Guidance for tourist and holiday accommodation that were adopted by both Councils to support the former development plans, namely the Unitary Development Plan (in the case of the Gwynedd Local planning Authority Area)

3.14 The following table gives details of the next steps and the timetable:

Action	When?
Joint Planning Policy Committee consider: <ol style="list-style-type: none"> i. comments of the Communities Scrutiny Committee and the Partnership and Regeneration Scrutiny Committee ii. feedback received during the public consultation period; iii. a draft final copy of the Supplementary Planning Guidance in order to determine whether or not the Guidance is suitable for adoption (and, therefore, to replace extant Supplementary Planning Guidance on this subject). 	12 March 2021
Use the adopted Guidance as a material planning consideration	13 March 2021 onwards
Make arrangements to raise awareness about this Guidance to both Planning Committees, various officers in both Councils, and companies and individuals that provide advice to applicants about planning permission	Spring 2021

4. RECOMMENDATION

4.1 The Communities Scrutiny Committee is requested:

- To accept the report and consider the Supplementary Planning Guidance: Tourist Facilities and Accommodation and the associated Consultation Report;
- Determine if there are any observations to be presented to the Joint Planning Policy Committee.

APPENDECIES

Appendix 1 Report on the Public Consultation

Appendix 2 Supplementary Planning Guidance: Draft Consultation - Tourist Facilities and Accommodation (October 2020)

**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**

DECEMBER 2020

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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 FTE ² 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 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 97				<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 Llanelian	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
Page 102					<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>

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

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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 105</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>	
<p>Objection</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 106</p>	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>
<p>Objection</p>	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	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>

**SUPPLEMENTARY PLANNING
GUIDANCE**

CONSULTATION DRAFT

**TOURISM FACILITIES
AND
ACCOMMODATION**



MARCH 2021

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN

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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:

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)	3.35	1.03
Number of day visitors (millions)	3.75	0.68
Number of FTE ² jobs supported by tourism spend	15,601	4,102

*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 National Planning Policy

- 2.1.1 National planning policy guidance on tourism is set out in Planning Policy Wales (PPW, Edition 10, Dec 2018) 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).
- 2.1.2 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).
- 2.1.3 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.

2.2 Joint Local Development Plan

- 2.2.1 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.
- 2.2.2 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.

2.2.3 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

FINAL DRAFT

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, visuals, landscape visual impact assessment, where appropriate, 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.

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”.

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

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

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 (9th Edition, Nov 2016: Figure 4.4) which states:

Previously developed 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 in built-up areas which has not been developed previously, for example parks, recreation grounds 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;
- previously developed land the nature conservation value of which could outweigh the re-use of the site; 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 local 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.

- 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 commensurable 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.

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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.

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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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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.

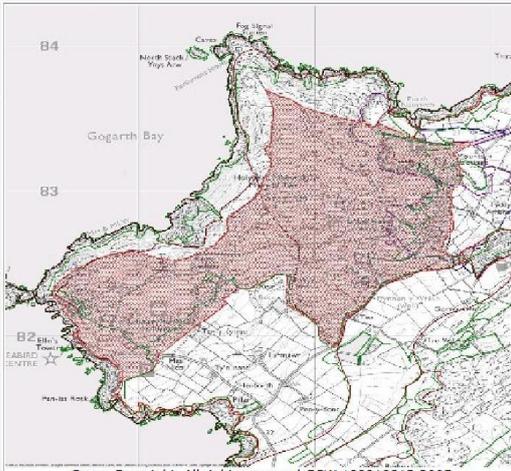
In the case of temporary residential caravans approved in accordance with this Policy, applications to renew temporary permissions will be assessed against the above criteria.

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 qualities that should be changed:	
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.	

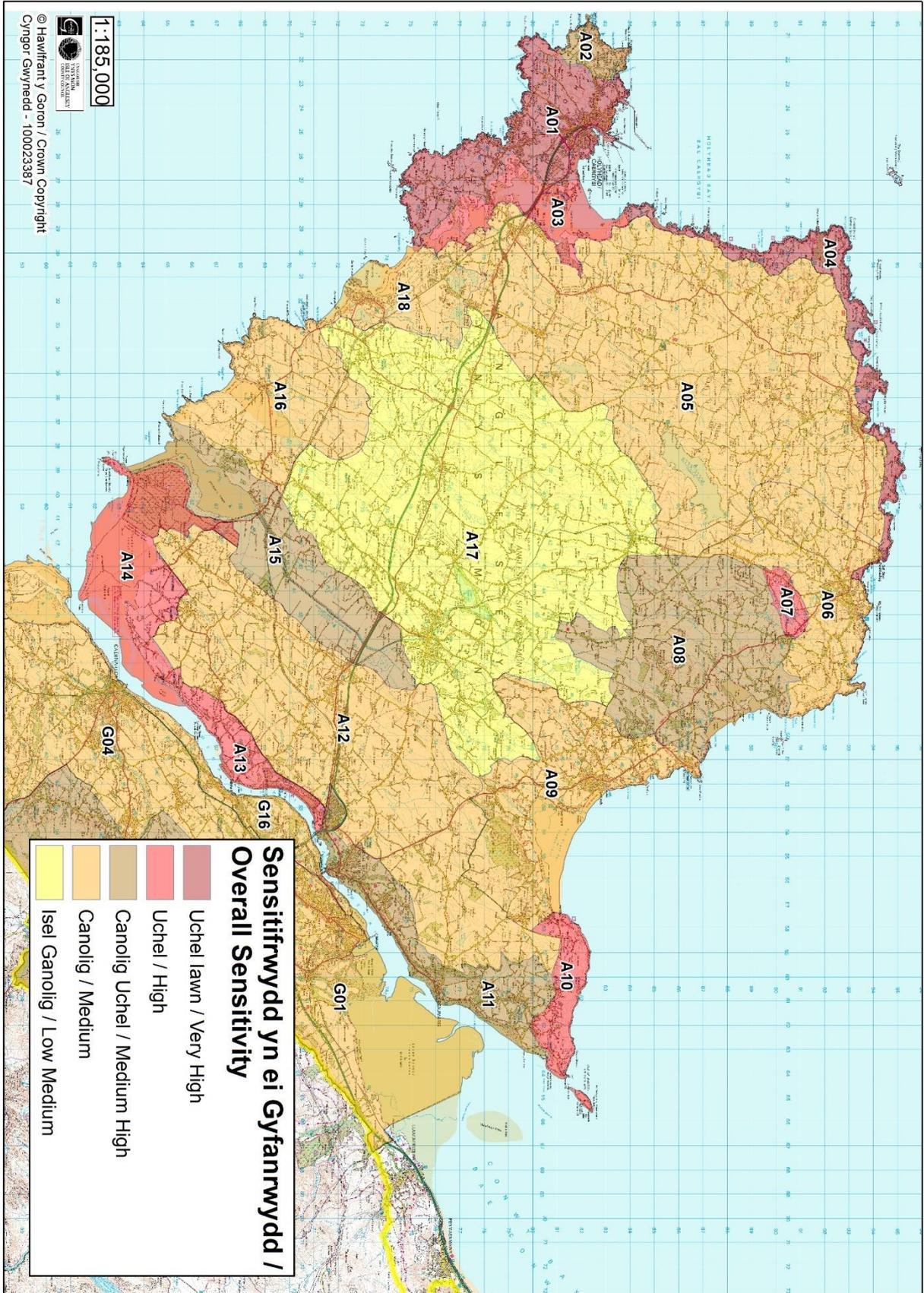
LCA	Indicative Overall Capacity	Sensitivity
G04	<p>Within the AONB and SLAs (and all areas that contribute to their setting and the setting of the National Park and WHS), there is typically no capacity for static caravan/chalet park developments.</p> <p>Outside these areas there may be some capacity 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>	

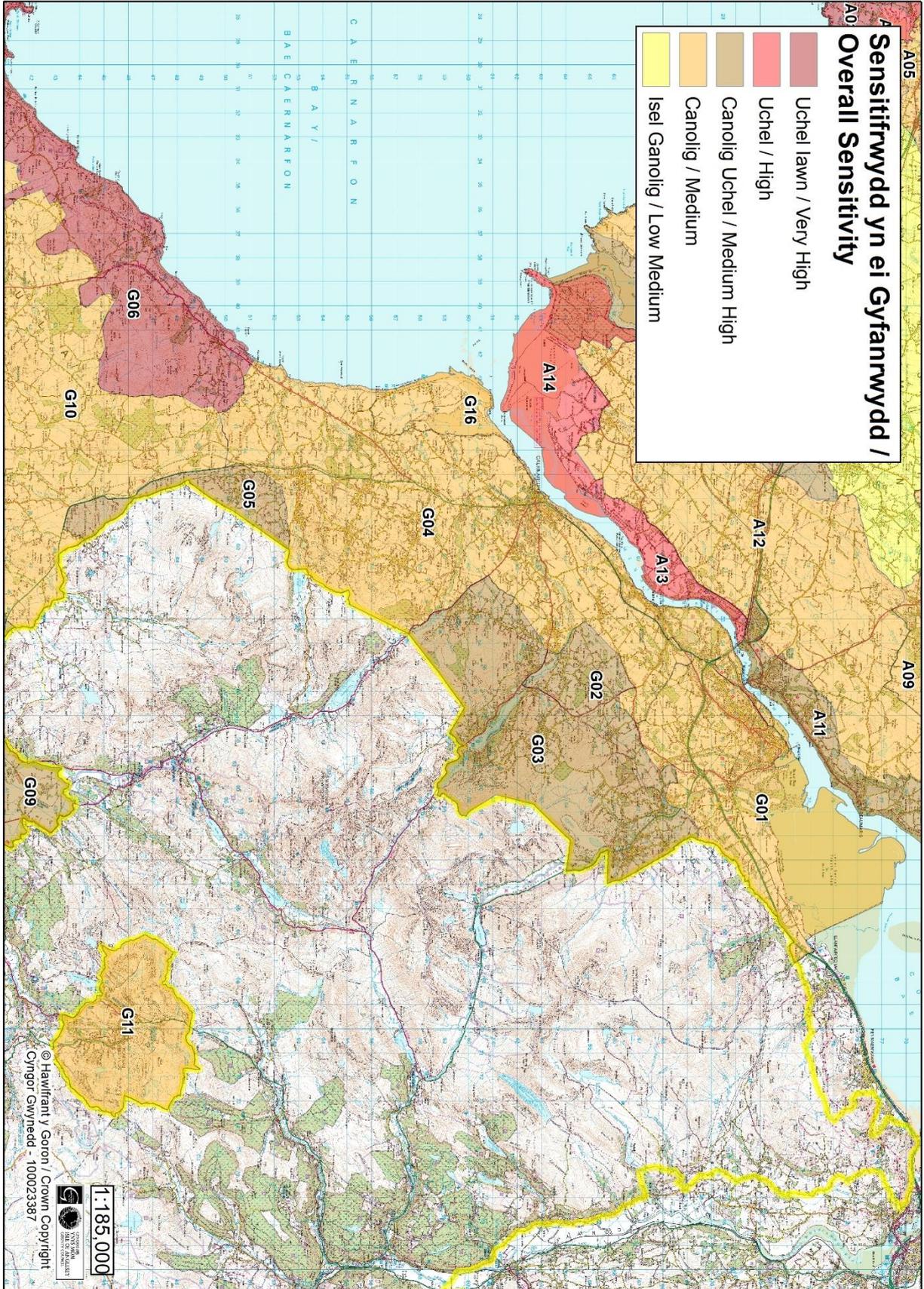
LCA	Indicative Overall Capacity	Sensitivity
	Outside these areas there may be some capacity for sensitively sited and well-designed very small to small scale developments , which should relate well to the existing built environment/urban landcover.	
G12	There is typically no capacity for static caravan/chalet 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.	

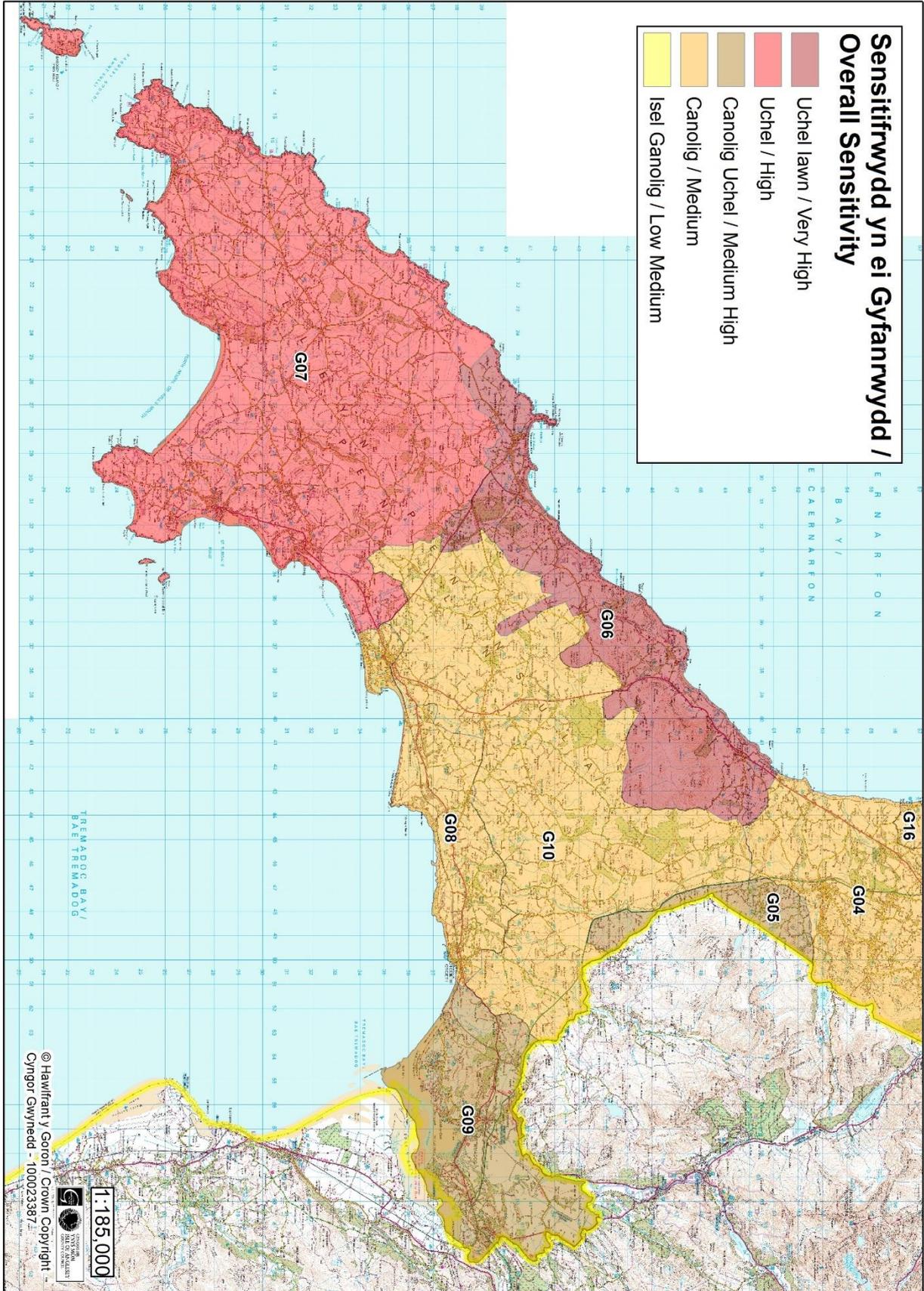
LCA	Indicative Overall Capacity	Sensitivity
A06	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments or extensions.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity 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>	

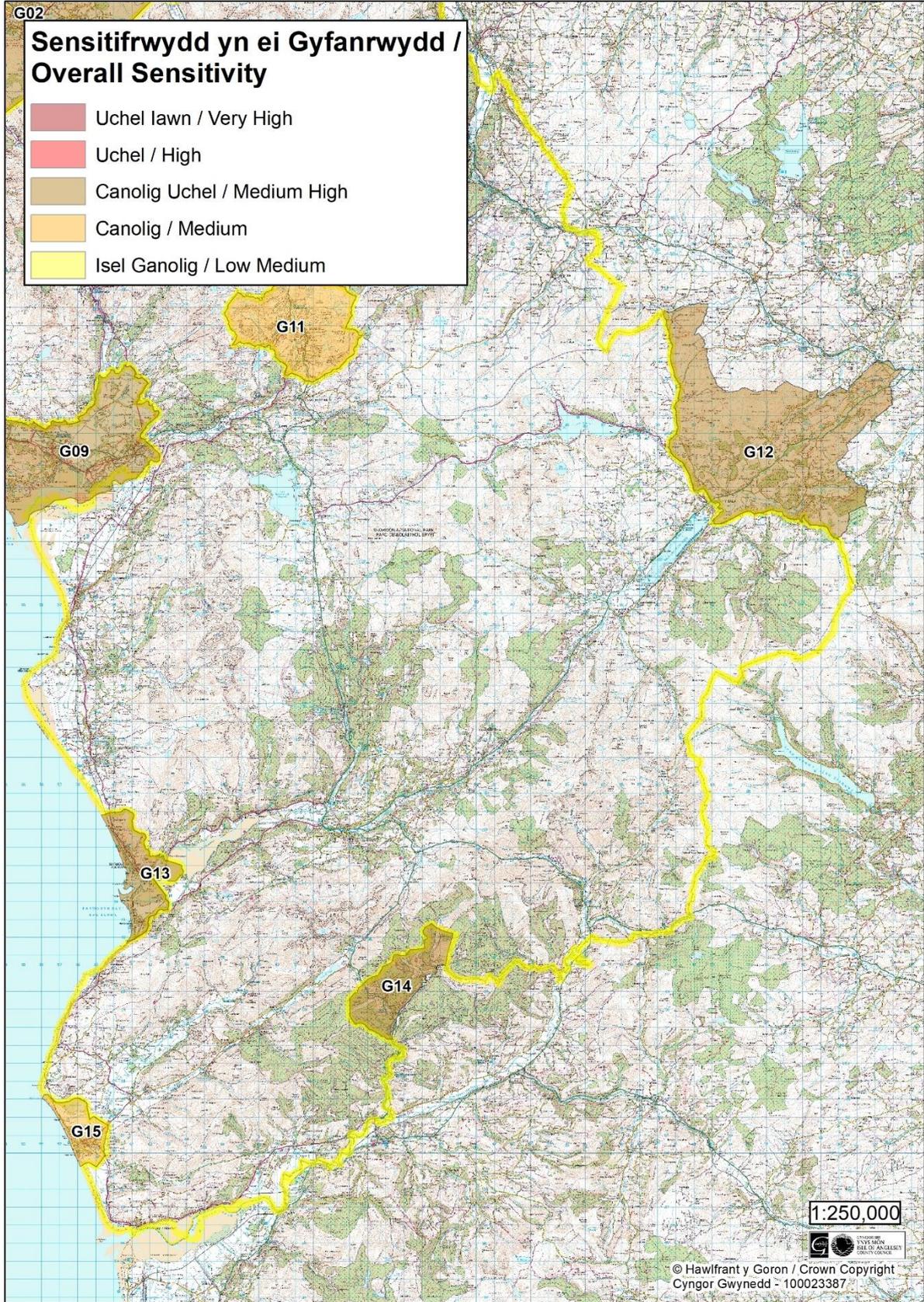
LCA	Indicative Overall Capacity	Sensitivity
A17	<p>Within the AONB and SLAs (and all areas that contribute to their setting), there is typically no capacity for further static caravan/chalet park developments and extensions.</p> <p>Outside the AONB and SLAs it is considered there may be some capacity 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

Agenda Item 7

Committee	COMMUNITIES SCRUTINY COMMITTEE
Date	25 February 2021
Job Title	The work of the Public Protection Services during the pandemic
Cabinet Member	Councillor Gareth W Griffith
Author	Dafydd Wyn Williams – Head of Environment Department
Purpose	Provide an explanation on the work of the Public Protection Services, including the Test, Trace and Protect Service, during the pandemic

1. BACKGROUND

- 1.1 The period of the pandemic has highlighted the importance of the work that the Council, through the Public Protection Services, is doing to protect the health of our residents and to support the area's businesses. The purpose of this report is to explain to the Scrutiny Committee and receive their observations, on how the work of the Public Protection Services has had to adapt in order to give priority to responding to the pandemic and the public health crisis.
- 1.2 The report also refers to matters that have been raised by the Cabinet in relation to the need for the Council to ensure the resilience of our Public Protection Services in the future, as well as the Environment Department's response to this.

2. THE PRE-PANDEMIC PERIOD

- 2.1 Before the pandemic struck, there were three Public Protection Services in the Department, namely:

Pollution Control and Licensing Service
Trading Standards and Animal Health / Animal Feed Services
Food, Health and Safety Service (including infectious diseases)

- 2.2 The day-to-day work fields of the **Pollution Control and Licensing Service** generally relate to protecting the public in relation to a range of environmental and health matters, including:

- Responding to air, land and water contamination and noise pollution
- Inspecting businesses with industrial processes
- Assessing the safety of private drinking water supplies and quality of bathing waters
- Dealing with licensing matters in the fields of alcohol, entertainment, gambling, vehicle, driver and taxi operators, pet shops, caravan sites, scrap metal dealers
- Arranging funerals when the deceased has no family

- 2.3 The day-to-day work fields of the **Trading Standards and Animal Health / Animal Feed Services**, relate to promoting, maintaining and ensuring a fair and just environment whilst protecting the interests of the residents and businesses of Gwynedd, as well as protect animal and public welfare by ensuring that animal feed meets specific standards. The work includes:

- ensuring fair trading, safety of goods and preventing the sales of age-restricted goods
- raising awareness of scams and illegal money lending
- dealing with legal estate agent and property descriptions matters
- licensing and enforcing petroleum and explosives/fireworks conditions
- holding programmed and responsive animal welfare and animal feed inspections
- weights and measures - ensuring that customers receive the correct amount of goods they purchase
- dealing with markets and fairs

2.4 The day-to-day work fields of the **Food, Health and Safety Service (including infectious diseases)**, includes programmed and responsive inspections in order to:

- Ensure that food and drink sold that is manufactured, stored, distributed, treated or used in the County, is free of any risk to the health and safety of the consumer and is in compliance with constitutional and labelling requirements.
- Prevent deaths, injuries and conditions that are associated with workplaces.
- Protect residents and visitors to Gwynedd against infectious diseases and harmful chemicals.
- Assist and support Gwynedd businesses to meet with the required statutory requirements.

3. THE PERIOD SINCE THE PANDEMIC STRUCK

3.1 In light of the pandemic, Public Protection duties involving infectious diseases have clearly become one of the Council's main priorities, and therefore a new Service has been created to undertake the relevant work, namely: **The Test, Trace and Protect Service - Covid**.

3.2 The Test, Trace and Protect service (TTP) was established in May 2020 and came into operation on 1 June 2020. By now, the Service employs 103 workers. The aims of the Test, Trace and Protect Services in Gwynedd are to:

- Reduce the spread of COVID-19 across our communities by supporting people infected with the virus to isolate during their infectious period;
- Identify the people who have been in contact with a positive case of COVID-19 and support them to isolate until the symptoms or the incubation period have elapsed;
- Support people with symptoms to get access to a COVID-19 test;
- Work with specialist partners in the risk management area to control any risks for people who are isolating together with wider communities and businesses in Gwynedd.

3.3 The Service includes the following functions:

- **Tracing Officers**, namely the initial point of contact for individuals who have tested positive for COVID-19. The tracing officer will discuss the symptoms, date of the outset of symptoms, the people who have been in contact with them, identify any risks, and work with the relevant support partner to manage these risks.

- **Advisors**, who are responsible for tracing people who have been in contact with the positive case. They will support them to isolate for 10 days.
- **Business Support Supervisors**, who support the tracing officers and advisors in their functions in terms of welfare and technical issues, manage the flow of cases/contacts on our IT systems, ensure the quality of their work and manage the interface of the TTP Service with other Gwynedd Council departments and Betsi Cadwaladr University Health Board.
- **Business Manager**, who monitors and manages the operational performance of the team.
- **Head of Service**, namely the Lead TTP Officer for Gwynedd

3.4 The Service is a combination of Gwynedd Council colleagues who have been redeployed to work specifically on TTP, Gwynedd Council colleagues (with other jobs) who work as bank staff to provide additional resilience, and colleagues who are employed by Flintshire County Council (North Wales TTP host authority).

3.5 Since June 2020, TTP in Gwynedd has responded to:

- 8049 cases of COVID-19 in Gwynedd, total between 01/06/20-31/12/20
- 1420 cases (Index cases) of COVID-19 have been identified, 01/06/20-31/12/20
- 6513 contacts to Index Cases have been created
- On average, in Gwynedd each positive Index Case has 4.67 contacts.

3.6 The Service has a strong network of partners, including:

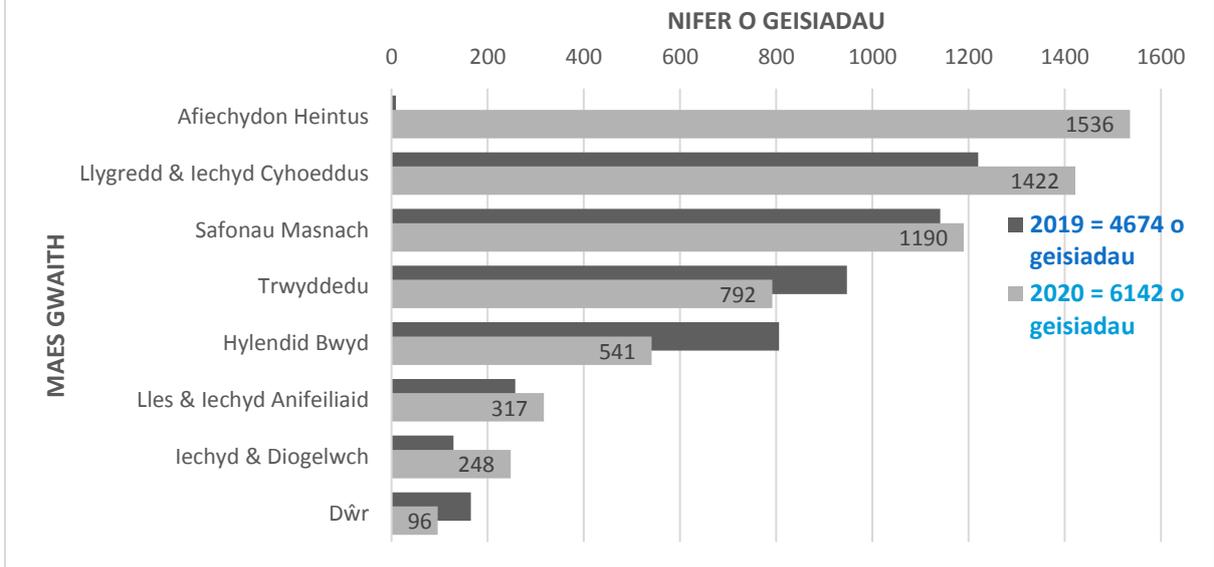
- The three Gwynedd Council Public Protection Services, who are collaborating to control the risks in businesses, pubs/cafes/restaurants, transport networks;
- Gwynedd Council Social Services, who are collaborating to manage the risks to residents of all ages when they isolate, as well as the risks in our care homes;
- Gwynedd Council's Education Service, who are collaborating to control the risks in our schools;
- Gwynedd Council's Human Resources Team, who are collaborating to support and manage our staff, and the staff employed by Flintshire County Council;
- Gwynedd Council's Finance Team, who are collaborating with Flintshire County Council (namely the host authority), to manage the budget for TTP;
- All North Wales Local Authorities, who are collaborating on cross-boundary cases, and offer support as needed at extremely busy times;
- Betsi Cadwaladr University Health Board, who are collaborating to control and advise of any medical risks or complications;
- Public Health Wales, who are collaborating to provide strategic guidance and the operational systems we use;
- Welsh Government, who lead on TTP for Wales.

3.7 In addition to dealing with cases in Gwynedd, the Service is undertaking substantial work on behalf of other local authorities across Wales - and this is called joint support. Since 1 June 2020, we have provided the following support throughout Wales to other local authorities:

- Approximately 550 positive COVID-19 cases
- Approximately 370 contacts to positive cases

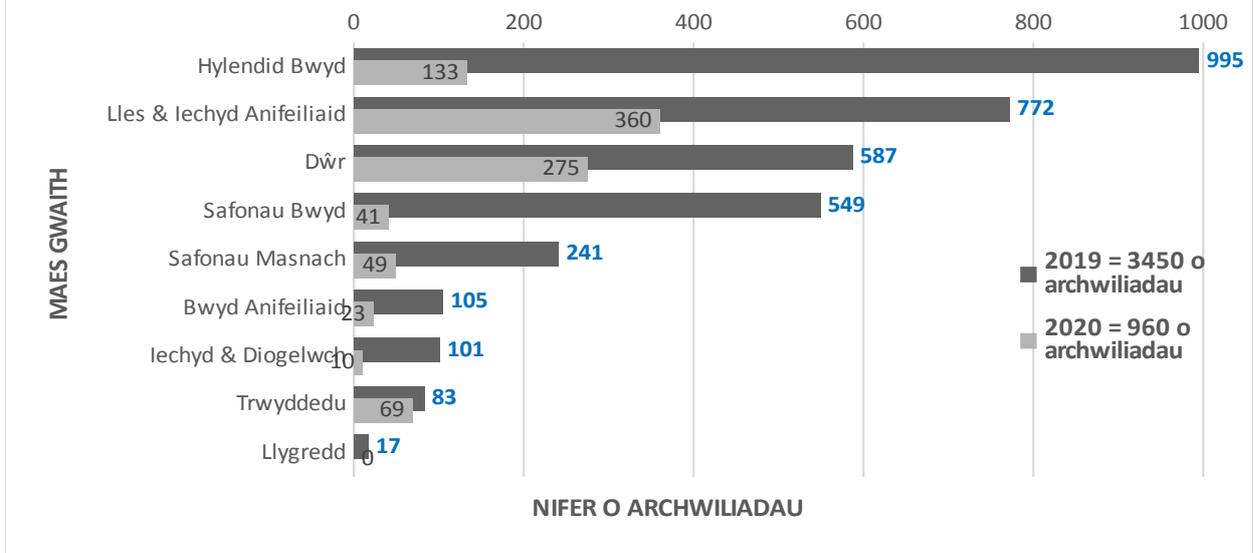
- 3.8 The flexibility of the TTP model enables us to be more resilient throughout the whole of Wales, to reduce the spread of the virus and ensure that we make the best use of public funding.
- 3.9 As well as initiate the need to create the new Service, the pandemic has had a direct impact on the day-to-day work of the three Public Protection Services referred to in part 2 of the report.
- 3.10 The majority of the duties in terms of enforcing the new coronavirus regulations have been implemented by Public Protection officers. Therefore, since March 2020, in response to the Covid pandemic crisis, the Public Protection Services have had to adapt and prioritise, in order to contribute to the spread of the virus as follows.
- 3.11 The Food and Health and Safety Service officers have been providing guidance to residential homes, businesses, schools, colleges and the university and individuals, in response to cases of Covid, and preparing specialist advice on hygiene measures and self-isolation guidance. The Food, Health and Safety Service officers, since their normal duties involve dealing with infectious diseases, addressed the task and initial challenge of establishing the Test, Trace and Protect Service.
- 3.12 The officers of the Trading Standards, Pollution and Licensing Services have been responding to requests for advice from businesses, and complaints from the public in relation to the Covid control regulations, and taking enforcement steps when appropriate in order to keep people safe. Officers have carried out inspections and support, advisory and monitoring campaigns in various business premises and sectors, e.g. supermarkets, garden centres, hairdressers, the taxi industry, etc. and have worked closely with other agencies as needed, for example, with the Police when carrying out proactive visits to pubs and restaurants over the busy summer period.
- 3.13 The Services have also been responding to an increase in domestic noise complaints and complaints about burning garden waste, which is likely to be associated with the fact that many are working from home.
- 3.14 The chart below shows the number of Service requests received by the three Public Protection Services during the same periods in 2020 and 2019, which provides the context for the impact on the type of work that has been done by the Services.

Siart i gymharu'r nifer o geisiadau am wasanaeth a dderbyniwyd yn ystod y cyfnod 1 Ebrill - 31 Rhagfyr yn 2019 a 1 Ebrill i 31 o Ragfyr 2020



3.15 The response of the services to the Covid crisis has meant that this work has had to be prioritised over many core duties - such as the food hygiene inspection programmes, animal feed hygiene, animal welfare inspections, sampling of private drinking water supplies, industrial processes inspections, trading standards visits, such as scam prevention, etc. Periods of national lockdown and social distancing regulations have meant that it has not been possible to hold inspections at a number of businesses over the period also, although some inspections have been held, based on risk. The chart below compares the inspections during the same period in 2020 and 2019.

Siart yn cymharu'r nifer o archwiliadau a gynhaliwyd yn ystod y cyfnod 1 Ebrill - 31 Rhagfyr yn 2019 ac yna yn 2020



3.16 Since the pandemic struck, the Department has been leading and contributing to work with partners locally, regionally and nationally, in relation to preventing the spread of the virus, and this continues.

4. THE RESILIENCE OF THE COUNCIL'S PUBLIC PROTECTION SERVICES

4.1 The period of the pandemic has highlighted the key role that the Public Protection Services have in protecting the health of Gwynedd's residents, and in this case, in preventing the spread of the virus. It has also highlighted the impact of years of cuts on the resilience of the Public Protection Service, and this is an issue that the Cabinet has asked the Department to respond to.

4.2 The Department has already started to address resilience in the Public Protection Services in the short-term, as well as the long-term, and has had Cabinet support to appoint three Community Engagement Officers, for a period up to the end of March 2022, with grant funding contributing to the costs.

4.3 In the short-term, the purpose of the three Community Engagement Officers is to have a visual presence in our communities and towns, in particular as restrictions begin to ease, who advise and assist businesses and residents on Covid issues, as well as report back on issues that could arise at the time. It is intended for them to become familiar faces in our communities, and a direct contact between Public Protection Services (and other Council Departments where practical) and Gwynedd residents and businesses. This can then assist the Public Protection Services to focus more on issues that are more complex and contentious in nature.

4.4 It is intended to use the interim period as an opportunity to invest in these Officers in the short-term, but with an eye on the long-term. Therefore, as well as an initial training period (which will be held by the Public Protection Services) in order to prepare the individuals to go out to the towns and communities, a programme of more comprehensive training is drawn up for the full period, and this includes:

- Training and experiences of the Test, Trace and Protect (TTP) work and of work in the various fields across the Public Protection Services
- Allocate officers from the Public Protection Services to mentor the Community Engagement Officers
- The above will include shadowing Public Protection Services officers in their day-to-day work.

4.5 Appointing to the temporary posts would therefore not only contribute towards the work in the pandemic, but will also be an opportunity to attempt to develop careers for the individuals in Public Protection fields, which could assist the Council to create more resilient Services in the long-term. Recent experiences have shown that it is difficult to attempt to recruit officers for Public Protection Services, in light of the need for relevant qualifications, training and experiences, and the training programme could be a solution for this whilst recruiting for the long-term.

4.6 These officers were appointed recently and it is expected that a reasonable amount of time will be required for initial training and to familiarise with Council arrangements, before the new officers will be in a position to fully undertake their duties.

4.7 The Department will monitor the situation over the coming months, in terms of the service's provision and the staff capacity that is needed to ensure the resilience of the Public Protection Services in the future.

5. RECOMMENDATIONS

5.1 The Scrutiny Committee is asked to accept the report and make any observations.