

**TOURISM FACILITIES AND ACCOMMODATION  
SUPPLEMENTARY PLANNING GUIDANCE**

**THE CONSULTATION REPORT**



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COUNTY COUNCIL**

**OCTOBER 2018**

# Contents

1.0	BACKGROUND .....	3
	Purpose of Supplementary Planning Guidance (SPG).....	3
	The Policy Context .....	3
	The need for Supplementary Planning Guidance .....	3
	The Status of Supplementary Planning Guidance.....	3
2.0	TOURISM FACILITIES AND ACCOMMODATION SUPPLEMENTARY PLANNING GUIDANCE.....	4
	Public Consultation .....	4
	APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND OFFICERS’ RECOMMENDATIONS .....	6

## **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 SPGs should, therefore, be given substantial weight as a material planning consideration.

## 2.0 TOURISM FACILITIES AND ACCOMMODATION SUPPLEMENTARY PLANNING GUIDANCE

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:

2016	Gwynedd*	Anglesey
Total economic impact of tourism	£1.01 billion	£284.34 million
Total visitor numbers (millions)	7.10	1.66
Number of staying visitors (millions)	3.49	0.99
Number of day visitors (millions)	3.61	0.67
Number of FTE2 jobs supported by tourism spend	15,557	4,032

\*includes Snowdonia National Park

2.1 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.

2.2 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.

### Public Consultation

2.3 A draft version of this SPG was approved for public consultation by the Joint Planning Policy Committee on the 26th April 2018. This draft was prepared in consultation with officers from the Development Management Section and Tourism Section of both Authorities. Prior to this the SPG was reviewed by the Joint Local Development Plan Panel on the 22nd March 2018.

2.4 The SPG was the subject of a public consultation exercise between the 17th May and the 28<sup>th</sup> June, 2018.

2.5 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 declared an interest in the SPG. The Tourism Section of both Authorities sent details of the consultation to members of their tourism forums to ensure that all interested parties would be aware of the emerging SPG and the opportunity to influence its content. Hard copies of the SPG were also available

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<sup>1</sup> STEAM Report 2016

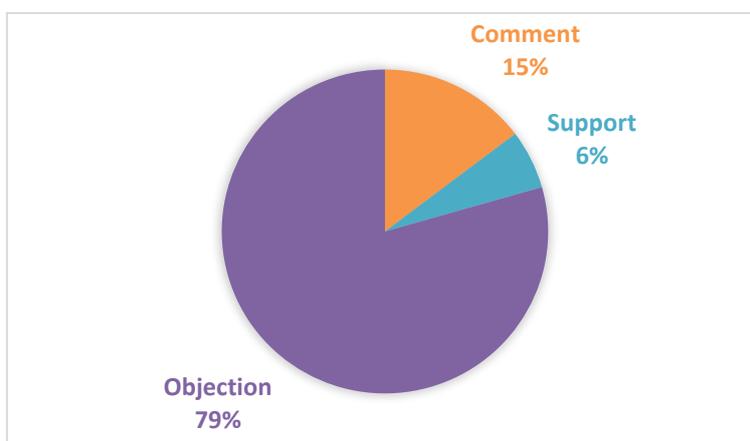
<sup>2</sup> FTE = Full Time Employment

to inspect in all public libraries, Anglesey County Council’s main office in Llangefni, and in Siop Gwynedd (Caernarfon, Dolgellau and Pwllheli).

2.6 A number of platforms were available for interested parties to respond to the consultation which were:

- Online interactive form (created and managed by Gwynedd Council’s Research unit)
- Online word and pdf response form - available on both websites and paper copies were made available in all libraries and Siop Gwynedd. Paper copies of the response form were also available on request from the JPPU
- Email
- Letter

2.7 A total of 25 comments were received: 5 general comments, 2 in support and 27 objections<sup>3</sup>.



2.8 The following section summarises the comments received, the Councils’ response to the comments and where appropriate, recommends any changes required to the SPG in lieu of the comment.

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<sup>3</sup> Includes 10 late submissions

**APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND THE RESPONSES**

Rep Id	Person Id	Type of Comment	Organisation	Part	Summary of Representation	Officer Comments and Recommendation
1	1	Comment	Cyngor Sir Ynys Môn	4.0	Following the appeal APP/L6805/A/18/3195709: Westlands, LL65 2UG how will the SPG provide advice about criterion v of Policy TWR 2, which seeks to avoid an over concentration of holiday lets in some communities?	<p><b>Accepted</b> Further guidance is required on this issue.</p> <p><b>Recommendation</b> Include criteria which will help define overconcentration of holiday accommodation within communities:</p> <p><u>“Criteria which help define overconcentration of holiday accommodation include:</u></p> <ul style="list-style-type: none"> <li>• <u>If the holiday accommodation units are distributed evenly across the settlement, it would not lead to areas of empty properties during the winter months.</u></li> <li>• <u>A large number of holiday accommodation units located in a settlement could change the character of the settlement and a loss of community may be seen as large numbers of these properties will be empty during off-peak times.</u></li> <li>• <u>The amenity of local residents may be affected i.e. noise complaints, increase in traffic etc</u></li> <li>• <u>Lack of community facilities and services as local businesses cater for the needs of</u></li> </ul>

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						visitors more than the needs of local residents.”
2	2	Comment	Cyngor Gwynedd	4.0	There is a need to elaborate on criteria 2 of policy PS14 regarding protecting hotels from change of use.	<p><b>Accepted.</b> A number of applications have been received</p> <p><b>Recommendation</b> Include a new section in chapter 4.0:</p> <p><u>“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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>

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						<p><u>use of specialist agents that have an experience of marketing and selling hotels.</u></p> <p><u>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.”</u></p>
3	3	Support	Bourne Leisure c/o Lichfields	1.2.1	<p>Bourne Leisure welcomes the recognition of the importance of tourism to the local economy of the Isle of Anglesey and Gwynedd in providing jobs, services and facilities and that the industry is noted as being subject to continuous change. This acknowledgement is important as it forms the basis for supporting the ability of the tourism industry to respond to the changing needs of the sector, which can result in the need to renew and maintain facilities and to renew or adjust the types of holiday accommodation provided.</p>	<b>Comment noted.</b>
4	3	Objection	Bourne Leisure c/o Lichfields	2.1.2	<p>Bourne Leisure considers that this draft sentence should be amended to more accurately reflect the actual wording of Planning Policy Wales (PPW) at paragraph 11.1.6, which states: “In some places there <u>may be</u> a need to limit new development to avoid damage to the environment (for example in undeveloped coastal areas), or to the amenity of</p>	<p><b>Accepted</b> The SPG should reflect national planning policy guidance.</p> <p><b>Recommendation</b></p>

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					<p>residents and visitors.” (<u>emphasis</u> added)</p> <p>PPW therefore indicates that it is sometimes the case that there is a need to limit new development in order to avoid damage to the environment; in some cases, there is no need to do so. For accuracy, Bourne Leisure therefore considers that draft paragraph 2.1.2 should be amended as follows:  “[Planning Policy Wales (PPW, Edition 9, Nov 2016)] recognises that there <u>is may be</u> a need to limit new development to avoid damage to the environment (for example in undeveloped coastal areas) (11.1.6).” (proposed amendment underlined)</p>	The sentence will be changed to reflect the changes suggested by the objector.
5	3	Objection	Bourne Leisure c/o Lichfields	3.2.4	<p>Bourne Leisure considers that a landscaping “strategy” or “proposals” should be required as part of a planning application. However, a detailed landscaping scheme should be required by condition, on the grant of planning permission.</p> <p>Whilst a landscaping strategy will often be helpful at planning application stage, it is inappropriate a landscaping scheme provides the full detail of works (including detailed planting schemes and maintenance schedules). Bourne Leisure considers that this level of detail is not usually needed at planning application stage, and would not be proportionate to what is likely to be necessary to understand the impacts of the</p>	<p><b>Not accepted</b>  The location of some tourism developments may be permissible in open countryside locations therefore landscaping is a very important issue. All proposals should be proportionate to the scale of the application.</p> <p><b>Recommendation</b>  No changes required to the SPG in light of this comment</p>

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					<p>proposal and any mitigation measures that might be required.</p> <p>TAN5 states that landscape schemes can be required by condition at paragraph 4.6.4: “The use of conditions can deliver a number of positive benefits to biodiversity beyond those of simply avoiding adverse effects. It is possible for conditions to require certain types of positive actions, for example:</p> <ul style="list-style-type: none"> <li>• The submission and agreement of a landscape scheme so that greater attention can be given to issues such as species composition.”</li> </ul> <p>Bourne Leisure therefore proposes that draft paragraph 3.2.4 should be amended as follows: “The landscaping <del>scheme</del> <u>strategy</u> should be submitted with the application. Conditions will be used to ensure that <del>the</del> <u>an</u> agreed landscaping scheme is implemented before the development becomes operational and is maintained in perpetuity.” (proposed amendments underlined, deletions in red)</p>	
6	3	Objection	Bourne Leisure c/o Lichfields	4.2.1	<p>Bourne Leisure considers that the scope of any required assessment in relation to the character of a site, its surrounds and its relationship with important focal points, views, historic buildings, etc. should be proportionate to the proposed development and its context. As drafted, the paragraph is unclear and the reference to</p>	<p><b>Accepted</b> Agree that assessments should be proportionate to the proposal.</p> <p><b>Recommendation</b> Change the wording in the paragraph as follows:</p>

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					<p>“thorough” could result in unnecessarily onerous details being requested.</p> <p>Bourne Leisure therefore proposes that draft paragraph 4.2.1 is amended as follows: “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 an <u>thorough</u> assessment of the character of both the site and its surrounds and the site’s existing or potential relationships with any important focal points, views, historic buildings etc. needs to be undertaken by the applicant. <u>This assessment should be proportionate to the scale and context of the proposals.</u>” (proposed amendments underlined)</p>	<p>“To ensure that this is achieved, <u>the applicant will be expected to demonstrate that the proposal fully takes into account</u> 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. needs to be undertaken by the applicant. <u>This assessment should be proportionate to the scale and context of the proposals.</u>” (proposed amendments underlined)</p>
7	3	Objection	Bourne Leisure c/o Lichfields	4.2.1 Point 3	<p>Bourne Leisure considers that draft paragraph 4.2.1 should encourage but not require new development which could substantially increase journeys by private vehicles to be located within/as close as possible to, or within reasonable walking distance of, service centres, and/or within reasonable walking distance to public transport routes.</p> <p>Whilst Bourne Leisure notes the overarching strategy for active and public transport travel, it should be acknowledged that tourist accommodation is often found away from centres</p>	<p><b>Accepted</b> The transport policies in the plan refer to locating close to public transport, where appropriate.</p> <p><b>Recommendation</b> The paragraph will be change to reflect the change proposed by the objector.</p> <p>3. In accord with the principles of promoting sustainable development it is important that new developments (including those on previously developed sites), which could</p>

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					<p>and edge-of-centre locations, due to its often close functional and visual relationship with the countryside and the sea. It is therefore not always possible to locate new tourism development “within or as close as possible to” service centres or public transport routes. Bourne Leisure considers that each development proposal should be considered on its own merits and should only be required to meet these objectives where feasible.</p> <p>Bourne Leisure therefore considers that draft paragraph 4.2.1 point 3 should be amended as follows:  “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, <u>where feasible.</u>”  (proposed amendment underlined)</p>	<p>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, <u>where feasible.</u></p> <p><u>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.</u>”  (proposed amendment underlined)</p>
8	3	Comment	Bourne Leisure c/o Lichfields	5.3 & Appendix 3	Bourne Leisure considers that the emerging SPG should clarify the relationship of the maps and tables provided in its appendices with the Landscape Sensitivity and Capacity Study, the	<b>Accepted Recommendation</b>

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					Anglesey Landscape Strategy and the Gwynedd Landscape Strategy, which are referenced at paragraphs 5.3.2 and 5.3.3. This clarification should be provided both in the main text of the SPG in Section 5.3 and at the beginning of each appendix. It should state whether the appendices are extracts from the relevant documents and provide references to the relevant sections within the reports.	Clarification will be provided regarding the relationship of the appendices to the SPG.
9	3	Objection	Bourne Leisure c/o Lichfields	5.3.2	<p>Bourne Leisure notes that whilst the Landscape Sensitivity and Capacity Study represents a useful starting point for the assessment of development proposals for caravan and chalet park proposals, it assesses only the capacity of broad Landscape Character Areas to accommodate new development. It does not, should not and cannot, assess every individual potential development location. It is likely, therefore, that there will be smaller pockets of land where caravan and chalet park development would be acceptable, despite not being identified as such in the Capacity Study. Bourne Leisure therefore considers that the emerging SPG should clarify that the Capacity Study should be used as a guide but that each site must be considered on its merits, on a case by case basis.</p> <p>Bourne Leisure proposes that draft paragraph 5.3.2 is amended as follows: "In order to define 'intensification' within the remit of Policy TWR 3,</p>	<p><b>Not accepted</b> The Councils assess every planning application on its own merit. Strategies such as the Landscape Sensitivity and Capacity Study are used as a guide to inform decisions.</p> <p><b>Recommendation</b> No changes required to the SPG in light of this comment</p>

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					the explanation to the Policy refers to the 'Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within the study each 'Landscape Character Area' (as defined by the Anglesey Landscape Strategy and the Gwynedd Landscape Strategy) 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 <u>but each site must be considered on its merits on a case by case basis.</u> " (proposed amendment underlined)	
10 & 11	3	Objection	Bourne Leisure c/o Lichfields	6.2.1	<p>Bourne Leisure considers that the scope of evidence required for touring caravan, camping and temporary alternative camping proposals in respect of landscape considerations should be proportionate to the scale and nature of the proposals. As currently drafted, paragraph 6.2.1 refers to the need for "strong" evidence, which could be understood as overly onerous.</p> <p>The word strong should be deleted from the paragraph.</p> <p>Draft paragraph 6.2.1 does not currently qualify the need to prevent harm to character or natural resources. Bourne Leisure considers that the</p>	<p><b>Accepted</b> Agree that assessments should be proportionate to the proposal.</p> <p><b>Recommendation</b> Change the wording of the paragraph to reflect the changes suggested by the objector.</p>

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					<p>required evidence should demonstrate that there would be no “unacceptable” impacts on servicing, traffic or the character and natural resources of the area. It should also take into account any proposed mitigation measures.</p> <p>TAN5 states at paragraph 2.4 (bullet point 8) that when deciding planning applications, local planning authorities should adopt a “step-wise approach to avoid harm to nature conservation, minimise unavoidable harm by mitigation measures, offset residual harm by compensation measures and look for new opportunities to enhance nature conservation”.</p> <p>Bourne Leisure considers that this approach should be reflected in the emerging SPG. As drafted, paragraph 6.2.1 is not consistent with this advice, as it does not provide a “step-wise approach”, and it does not recognise the potential for mitigation measures to make a proposed development acceptable.</p> <p>Bourne Leisure therefore proposes that draft paragraph 6.2.1 is amended as follows: “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</p>	

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					exist in many communities located on or near to the coast, including extensive parts of the Areas of Outstanding Natural Beauty. The Authority will require <u>strong proportionate evidence to demonstrate</u> that proposals for further units of accommodation in such areas will not add to servicing problems, <u>or generate</u> unacceptable traffic impacts, <u>or unacceptable harm to</u> <del>or harm</del> the character or natural resources of these areas, <u>following mitigation.</u> " (proposed amendments underlined)	
12	4	Objection	Cadnant Planning	3.1	<p>Section 3.1 seeks to provide guidance on high quality development. Para 3.1.3 identifies criteria which help to define high quality development. We consider that the criteria listed in 3.1.3 seeks to introduce new considerations which conflict with the criteria of relevant policies in the adopted JLDP. SPGs should provide guidance but should not introduce new criteria.</p> <p>In our opinion, criteria listed in 3.1.3 is too prescriptive and seeks to introduce new criteria which goes beyond that of the policies contained in the JLDP. We consider that 3.1.3 should be removed in its entirety.</p>	<p><b>Not accepted</b> The objection does not show how the considerations in para 3.1.3 conflict with the policies in the plan. The JPPU believe that paragraph 3.1.3 elaborates on the wording of the policy.</p> <p><b>Recommendation</b> No changes required to the SPG in light of this comment</p>
13	4	Objection	Cadnant Planning	3.2.1	Para 3.2.1 states that the JLDP defines an 'unobtrusive location' 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	<p><b>Not accepted.</b> Paragraph 6.3.88 of the JLDP clearly states: "An unobtrusive location is defined as one which is well screened by existing landscape features and/or where touring units can be</p>

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					made features". That is not how the JLDP defines 'unobtrusive location'. There is no reference to "without the need for excessive man made features". The JLDP reads "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". We consider that this should be amended to be in line with the wording of the JLDP.	readily assimilated into the landscape without the need for excessive man made features such as hard-standing and fencing."  <b>Recommendation</b> No changes required to the SPG in light of this comment
14	4	Objection	Cadnant Planning	3.3.2	The SPG is seeking to introduce new and additional criteria to existing adopted policies in the JLDP. Criteria 1 of policy PS1 does not make reference to tourism developments. Criteria 1 is only of relevance to retail, industrial or commercial developments. Not tourism developments. We consider that the following sentence should be removed in its entirety from para 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".	<b>Not accepted.</b> Tourism developments are a form of commercial development as the buildings/units or land are used to generate a profit.  <b>Recommendation</b> No changes required to the SPG in light of this comment
15	4	Objection	Cadnant Planning	4.4.2	Anglesey and Gwynedd are rural areas, however, they are sustainable. The assessment of the suitability of a previously developed site should be steered towards sustainable locations. Just because a site is not within a settlement, does not mean that it is not in a sustainable location. It may	<b>Not Accepted</b> In line with national planning policy, the LPA will be more likely to give favourable consideration to proposals located within or close to existing settlements but consideration

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					be that the site is connected by way of public transport or cycle paths/routes, which makes it a sustainable location, where users would not be wholly dependent on their cars. This has been the view taken by inspectors on recent appeal decisions, including APP/L6805/A/13/2198598. When considering the nature of previously developed land, we consider that this bullet point should make reference to existing buildings which may be present on previously developed sites. The visual/landscape effect of any new development should consider the fall-back-position of the existing buildings on site.	<p>is also given to proposals located close to existing transport hubs such as bus stops.</p> <p>The presence of existing buildings on site would be considered in assessing development proposals on previously developed sites.</p> <p><b>Recommendation</b></p> <p>No change required to the SPG in lieu of this objection.</p>
16	4	Objection	Cadnant Planning	4.5	There is no reference within the policies of the JLDP to extensions to existing permanent holiday accommodation business. Once again, it is considered that the SPG is seeking to introduce new considerations, which are not contained in the adopted JLDP.	<p><b>Not accepted.</b></p> <p>Criteria 3 of policy TWR2 refers to extending existing holiday accommodation establishments.</p> <p><b>Recommendation</b></p> <p>No changes required to the SPG in light of this comment</p>
17	4	Objection	Cadnant Planning	4.6.5	It is unclear why the SPG requires the Business Plan to be prepared by a qualified individual/company. Many business owners are component individuals who have the knowledge and ability to prepare a robust business plan for their business. Many of those business plans are accepted by financial institutions for lending purposes. If so, it is unreasonable for the Local Planning Authority to insist that only business	<p><b>Accepted.</b></p> <p><b>Recommendation</b></p> <p>Delete paragraph 4.6.5</p>

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					plans prepared by 'qualified individual/company' will be acceptable, when financial institutions accept business plans by others for lending purposes. We consider that this requirement places an unnecessary burden on applicants, and should therefore be removed.	
18	4	Objection	Cadnant Planning	5.1.1	The definition of a chalet in para 5.1.1 conflicts with the definition of a chalet provided in policy TWR 3 of the JLDP. As the JLDP has been through significant consultation and has been subject to public examination and approved by appointed inspectors, we consider that the definition of a chalet as per Policy TWR 3 takes precedent and the definition in para 5.1.1 of the JLDP should be amended.	<p><b>Not accepted</b> The Glossary of Terms defines a chalets as a "One storey semi-permanent construction which is still movable". The Glossary of Terms is part of the plan and has been through the various stages of consultation prior to adoption.</p> <p><b>Recommendation</b> No changes required to the SPG in light of this comment</p>
19	4	Objection	Cadnant Planning	6.6.2	The content of this paragraph goes beyond what may be considered acceptable by criteria 2 of policy TWR 5 and contradicts the requirement of criteria 1 of the same policy. If development is to be of high quality, hard standings will be required for touring units. Anglesey and Gwynedd are rural locations, where rainfall can be high. Hard standings are therefore an essential requirement to ensure that such sites are of high quality. Spend from tourists utilising touring sites are high, however, you cannot expect to obtain a significant contribution to the local economy, when you are unable to provide basic hard	<p><b>Not accepted.</b> Proposed developments that are permitted under policy TWR5 are considered more acceptable in land use planning terms as having less impact on the landscape than static caravan sites because, by their very nature, they have transient features that do not impose permanent, year round effects on the local environment. Excessive use of hard standing and other permanent feature goes beyond the ethos of this policy. This is supported by paragraph 6.3.88 which states that "An unobtrusive location is defined as one</p>

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					standings for touring units. We consider that 6.6.2 goes beyond that required by criteria 2 of Policy TWR 5 and should therefore be deleted.	<p>which is well screened by existing landscape features and/or where touring units can be readily assimilated into the landscape without the need for excessive man made features such as hard-standing and fencing.”</p> <p><b>Recommendation</b> No changes required to the SPG in light of this comment</p>
20	5	Comment	Cyngor Gwynedd	Appendix 4	The business plan should make reference to/be in synergy with Croeso Cymru’r strategies and initiatives.	<p><b>Accepted.</b> Including a section in the business plan to show how the proposed business compliments national tourism strategies/initiatives will strengthen the business case of the proposed development.</p> <p><b>Recommendation</b> This will be included in the business plan template.</p>
21	6	Comment	Llanfair ME Community Council	Various	Paragraphs 3.1.2, 3.3.1 and 4.6.1 and policy TWR3 part 2i,ii and iii are very important to Llanfair Mathafarn Eithaf Community Council because of the current concentration of caravan sites and holiday accommodation within the Community Council. The number of campsites on the coastline from Red Wharf Bay to the west of Benllech is substantial with a number of application to extend current sites and for new sites going through the planning process at the moment. We undertook a study of the situation	

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					some months ago which revealed that there were seven applications have been submitted over the last eighteen months, and two of these have already been given permission. If these applications were all approved and all existing holiday units full it would result in an 18% increase in the population of the community council's catchment area which is around 2800 at this time. The strain on public services is substantial with transport and sewerage suffering, let alone the effect on the culture and language. There is a grim future for the youth of the area who wishes to remain in the community to raise a family.	
22	7	Objection	Llanystumdwy Community Council	3.3.2 & 4.6.5	Paragraph 3.3.1 reads "... a Welsh Language Statement will be required, which will protect ..." Paragraph 4.6.5 states "The Business Plan should be prepared by a qualified individual/company." Later on the paragraph states "The 'Business Plan' should clearly state who has undertaken the Plan along with the individual's qualification in relation to undertaking the work." For consistency, paragraph 3.3.2 should state: "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, <u>which should be prepared by a competent individual/company, which will protect, promote and enhance the Welsh language. The Welsh</u>	<p><b>Not Accepted</b></p> <p>Comment noted. Nonetheless, it isn't this Guidance's role to provide advice about how to apply Policy PS 1/ prepare a Welsh Language Statement. A separate Guidance will do this, and will deal with the matters raised in the comment. Paragraph 3.3.4 refers to that Guidance, stating that it will provide additional information.</p> <p>The Community Council will be given an opportunity to submit comments about that Guidance during a Public consultation period that will take place in due course.</p> <p><b>Recommendation</b></p>

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					<u>Language Statement should clearly state who has prepared the Statement as well as the individual's qualifications to undertake the work."</u>	No changes required to the SPG in light of this comment
23	7	Objection	Llanystumdwy Community Council	4.7	The document refers to allowing a change from a Holiday unit to permanent residence, which will be affordable housing. We are of the opinion that this needs to be strengthened. A specific time-period should elapse, e.g. 10 years, since permission was granted to create a holiday unit.	<p><b>Not Accepted</b></p> <p>It is not considered that there is any basis to set fixed term before looking favourably on an application to change the use of holiday accommodation to an affordable house. The Guidance sets out the need for compelling evidence before it can support proposals of this kind, i.e. showing that the business as holiday accommodation is not viable, then showing that an alternative business use cannot be developed, then demonstrate that the property cannot be used as a home for someone who works in rural enterprise, before consideration can be given to provision of an affordable housing to meet local need.</p> <p><b>Recommendation</b></p> <p>No changes required to the SPG in light of this comment</p>
24	7	Objection	Llanystumdwy Community Council	4.3	There is a danger that there will be many more farm units changed to holiday units over the next few years. The definition of ' excess ' in the document is very vague.	See response to comment (1), which suggests amending the text to identify material considerations.
25	7	Objection	Llanystumdwy Community Council	5.0	It is clearly stated in the paragraph and Policy TWR 4 that Caravan and Chalet should not be used for residential purposes, only holidays only.	<b>Comment noted</b>

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					But there is no definition of how land is a holiday period. Without this, the policy is somewhat meaningless and of course this is equally true for self Service holiday accommodation.	<p>Policy TWR 4 states that permission should not be granted if the intention is to use an existing caravan or chalet as the main or only residence. Paragraph 4.7.3 of also includes text that relates to holiday use. It is stated that only holiday use will be permitted and therefore the consent will not cover a household's use of a property as a main or only residence.</p> <p><b>Recommendation</b> No changes required to the SPG in light of this comment</p>

#### Late Representations

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26	8	Objection	Natural Resources Wales	4.3.2	We wish to see included in this list the consideration of whether the building lies within zone C as defined by development advice map referred to under TAN 15 Development and Flood Risk (July 2004).	<p><b>Accepted</b> TAN 15 defines Holiday accommodation as vulnerable development and should not be permitted in zone C flood risk areas.</p> <p><b>Recommendation</b> Include reference to zone C flood risk zone in the list found in 4.3.2</p>
27	8	Objection	Natural Resources Wales	4.8	We do not wish to see existing hotels located in zone C converted to permanent residential use	<p><b>Not Accepted</b> This section of the SPG deals with the main principle of the loss of hotels. Other SPGs will</p>

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					unless a Flood Consequences Assessment (FCA) is submitted as part of any application.	deal with the suitability of the building for conversion.  <b>Recommendation</b> No changes required to the SPG in light of this comment
28	8	Support	Natural Resources Wales	6.6.3	We note within paragraph 6.6.3 that SUDS are welcomed as a form of surface water drainage.	<b>Comment noted</b>
29	8	Objection	Natural Resources Wales	General	It would be helpful to point out in this document that to achieve a high quality and sustainable tourism development, applicants may require the input of specialist landscape, natural and built environment consultants. For example when a development is located in a sensitive or prominent area.	<b>Accepted</b> Paragraph 4.3.3 states that a structural survey should be undertaken by a suitably qualified person. This is also the case with any landscape assessments and will be included in the SPG.  <b>Recommendation</b> Include reference to a suitably qualified person in section 3.2.
30	8	Objection	Natural Resources Wales	General	No consideration appears to have been given to external lighting. It is advised that in non-residential areas that external light spillage is given greater consideration.	<b>Not Accepted</b> The matter of light pollution is covered in policy PCYFF2 of the JLDP and the first bullet point in paragraph 3.1.2 of this SPG.  <b>Recommendation</b> No changes required to the SPG in light of this comment
31	8	Objection	Natural Resources Wales	3.2.1	Include the following text in italics for clarification purposes:	<b>Accepted</b>  <b>Recommendation</b>

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					Landscape <i>character, natural and built conservation features, setting, the availability of views</i> , site layout and screening are important considerations in assessing tourism proposals.	Include the text in italics to paragraph 3.2.1
32	8	Objection	Natural Resources Wales	3.2.7	<p>Include the following text in italics for clarification purposes:</p> <p>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. <i>Reference to the relevant authority's AONB management plan document and Landscape Strategies here would be helpful.</i></p> <p><i>It would be helpful to include a Landscape Designations plan within the appendix showing the boundaries of the AONB's, SLAs, any Heritage Coasts and Snowdonia National Park for the combined plan areas. This would provide a useful quick reference planning tool, for both LPA officers and planning applicants.</i></p>	<p><b>Accepted in part</b></p> <p>The SPG should make reference to the management plans. However there is no need to include designation maps in the SPG – these can be found on the JLDP's constraints map.</p> <p><b>Recommendation</b></p> <p>Include reference to the AONB Management Plan and the SLA Review Study in section 3.2.7.</p>
33	8	Objection	Natural Resources Wales	4.3.2	<p>Two additional points would be helpful:</p> <ul style="list-style-type: none"> <li><i>The use of external spaces for car parking, gardens, amenity and their means of enclosure does not result in suburban characteristics within the countryside</i></li> <li><i>Any additional exterior lighting uses shielded lamps and is located to avoid obtrusive lighting to protect night time character of the countryside</i></li> </ul>	<p><b>Not Accepted</b></p> <p>The SPG cannot cover all aspects of developments. The points can be included in emerging SPGs on conversion and design.</p> <p><b>Recommendation</b></p> <p>No changes to the SPG in light of this comment.</p>
34	8	Objection		6.0	POLICY PCYFF 4: DESIGN AND LANDSCAPING points to what may need to be addressed	<b>Accepted in part.</b>

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					generally within a planning application, however design guidance on what makes a development sustainable in the landscape would also be helpful. We therefore recommend you include design guidance specific to this type of development.	<p>Design guidance in relation to caravan sites is unlikely to be covered within any other emerging SPG, therefore it is appropriate to include further guidance in relation to design within this SPG.</p> <p><b>Recommendation</b> Include a list of Design Guidance consideration when dealing with planning applications</p>
35	9	Objection	Welsh Government (Historic Environmental Service – Cadw)	General	The SPG makes no mention of the Castles and Town Walls of King Edward in Gwynedd World Heritage Site Management Plan 2018-28, which provides detailed information on tourism and development in the World Heritage Site and the essential settings. We recommend that a short section should be inserted in Section 3 of the SPG giving an explanation of the World Heritage Site management plan and how it will relate to the SPG.	<p><b>Accepted in part</b> The box in paragraph 3.1.3 “Criteria which help define high quality development” refers to new developments respecting historic environment</p> <p><b>Recommendation</b> To include examples of the type of historic designations similar to how the box deals with the landscape designations.</p>