

CYNGOR GWYNEDD CABINET



Report to a meeting of Cyngor Gwynedd Cabinet

Date of meeting: 13/06/23

Cabinet Member: Councillor Dafydd Meurig

Contact officer: Gareth Jones, Assistant Head of Environment Department

Contact Number: 34092

Subject: Introducing an Article 4 Direction to enable the management of the transfer in use from residential dwellings to holiday use (second homes and holiday accommodation).

THE DECISION SOUGHT

- 1. Approve the report justifying the Introduction of Article 4 Direction in Appendix 1.**
- 2. Approve the making of an Article 4 Direction which does not come into effect immediately but after 12 months (Annex 2) for the Gwynedd Local Planning Authority Area in order to revoke the permitted development rights for the following uses**
 - (a) Change of use from C3 (primary residence) to C5 (second home) or C6 (short-term holiday let) and specific mixed uses;**
 - (b) Change of use form C5 (second homes) to C6 (short-term holiday let) and specific mixed uses;**
 - (a) Change of use from C6 (short-term holiday let) to C5 (second home) and specific mixed uses.**
- 3. That the Article 4 Direction notice as is presented in Appendix 3 be published and served in accordance with the requirements, (accepting that it is not practicable to present individually to each owner and occupier within the area because of its size) for a period of not less than six weeks to allow the public to submit responses to the intention.**
- 4. Receive a further report to consider any responses received (following the pubic engagement period) in order to make the decision to confirm the Article 4 Direction.**

5. Delegate the rights to the Head of Environment Department in consultation with the Head of Legal Services to make editorial adjustments to the notice prior to publication.

REASONS FOR THE NEED FOR A DECISION

Amendments to the Town and Country Planning Order (Use Classes) 1987 have created 3 new use classes for Primary Residence (C3), Second Homes (C5) and Short-Term Holiday Let (C6). If considered appropriate, in order to prevent and gain control of the unrestricted change of use between the new use classes, Local Planning Authorities have the power to introduce an Article 4 Direction for a particular area. Cabinet decision on the appropriateness of using this right is required.

INTRODUCTION AND RELEVANT CONSIDERATIONS

1.0 INTRODUCTION

- 1.1 Amendments to planning legislation that have been in force since 20 October, 2022 enable Local Planning Authorities to respond to the challenges associated with second homes and holiday accommodation in a way that was not previously possible.
- 1.2 The changes to planning legislation include:-
 - Amending the Town and Country Planning (Use Classes) Order 1987¹ to create three new use classes for **Primary Residences (C3), Second Homes (C5) and Short-term Holiday Lets (C6)**;
 - Amending the Town and Country Planning (Permitted General Development) Order 1995 to allow unrestricted changes between the three new use classes (Primary Residences, Second Homes and Short-term Holiday Lets). Namely, no planning permission is required to move from one of the use classes to another;
 - Amending Planning Policy Wales to make it clear, when relevant, that the number of second homes and short-term holiday lets in a local area must be considered when considering the housing requirements and policies in Local Development Plans (LDPs).
- 1.3 Currently, as a result of these changes, residential dwellings depending on the use made of them when the legislative changes were announced, are defined in accordance with the new relevant use class category. For example, a dwelling house that is the primary residence for an individual will be defined as C3 use (Primary Residence), a property used as a second

1 [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#)

home will be defined as C5 use (Second Home) and a property used as short-term holiday let will be defined as C6 use (short term holiday let).

- 1.4 Owners have the right to change the use of a residential dwelling from one of the new use classes (C3, C5 and C6) to another use class, without having to ask for planning permission, as the amendment to planning legislation will allow this (permitted development right). New planning applications for main residences/second homes/short-term holiday lets will obtain planning permission for the relevant use class.
- 1.5 If deemed appropriate, in order to restrict the unrestricted change of use between the new use classes and gain control over it, the Local Planning Authority has the power to introduce what is called an **Article 4 Direction** for a specific area. An Article 4 Direction (depending on its content and scope) would remove the rights to change between the use classes without planning permission. It is possible to implement the Article 4 Direction for a specific area (no definition noted in legislation), provided that it can be evidenced that there are exceptional circumstances that justify it and that the process of presenting and receiving approval to the proposal has followed the correct procedures. These procedures are set out in the relevant legislation.
- 1.6 It is emphasised that issuing an Article 4 Direction does not prevent development but rather, it means that planning permission must be sought from the Local Planning Authority for the proposal. By enforcing the need to obtain planning permission, it means that consideration is needed on the impacts of the development in accordance with the local and national planning policy context.

2.0 SCRUTINY

- 2.1 The matter, namely the principle of introducing an Article 4 Direction to enable the management of the use of residential dwelling, was reported to the Cyngor Gwynedd Communities Scrutiny Committee on 9 March, 2023. The report submitted to the Committee was accepted and it was recommended that the Cabinet should approve the preferred option (to implement the Article 4 Direction for the entire Gwynedd Local Planning Authority Area). Further, on a matter that was not directly related to the Article 4 Direction, it was requested that the Policy Service should re-visit the threshold set to define the over-provision of holiday accommodation and second homes in communities, during the process of drafting the new Local Development Plan.

3.0 PURPOSE:

- 3.1 This report presents the paper that has been prepared to justify the principle of introducing an Article 4 Direction for the Gwynedd Local Planning Authority Area (See Appendix 1).
- 3.2 Together with presenting an overview of the justification for introducing the Article 4 Direction, an overview is submitted of the steps involved in the process and the associated documents.

4.0 PROPOSAL

4.1 Background

- 4.1.1 Over the years, Cyngor Gwynedd has campaigned and brought pressure on the Government to get to gain control of the increasing holiday home ownership across the county and the associated side-effects. During 2020 research was prepared by the Joint Planning Policy Service, 'Managing the use of Dwellings as Holiday Homes'. The research was approved by the Council's Cabinet and was forwarded for the attention of the Welsh Government.
- 4.1.2 In response to this work together with calls from other groups/organisations the Government was prompted to respond to the crisis by issuing/considering issuing a range of appropriate control measures for holiday accommodation and second homes.
- 4.1.3 One of the control measures implemented is the change to planning legislation, with this change placing the direction of implementation in the hands of Local Planning Authorities.

4.2 Justifying the introduction of Article 4 Direction

- 4.2.1 The attached paper (Appendix 1) highlights the relevant considerations associated with considering the propriety of implementing the Article 4 Direction for the Gwynedd Local Planning Authority area, but also looking at this within a county context.
- 4.2.2 The paper is split into 7 sections. This is a brief overview of paper's contents:-

Part 1: Introduction

- 4.2.3 An overview is given of the legislative changes and the new associated powers. Furthermore an overview is included of the relevant context in terms of the propriety of issuing the Article 4 Direction, including considering the propriety of what is sought to be achieved via intervention in

accordance with legislation, strategies and national and local planning guidance.

Part 2: Provision and location of holiday accommodation and second homes

4.2.4 To gain an understanding of the seriousness of the matter and the propriety of implementing the Article 4 Direction, it is considered appropriate that an assessment is undertaken of the number of houses used as holiday accommodation (second homes and holiday accommodation) in Gwynedd.

4.2.5 The following table conveys the Council Tax data for those units that pay the second homes premium (Class B property where no one resides there permanently and where the property is furnished) or paying non-domestic business tax rates as a holiday let in Gwynedd for a period of 4 years:-

| | Number of Domestic Properties | Number of second homes (excluding units with an occupancy restriction) | Number of Holiday Lettings | Combined number |
|----------------------|--------------------------------------|---|-----------------------------------|------------------------|
| July 2018 | 61,679 | 5,100 | 1,193 | 6293 |
| May 2019 | 61,616 | 5,013 | 1,658 | 6671 |
| June 2019 | 61,591 | 4,891 | 1,681 | 6572 |
| October 2019 | 61,562 | 4,920 | 1,764 | 6684 |
| February 2020 | 61,617 | 4,912 | 1,838 | 6752 |
| June 2020 | 61,645 | 4,873 | 1,976 | 6849 |
| November 2020 | 61,946 | 4,933 | 2,119 | 7052 |
| February 2021 | 61,534 | 4,768 | 2,261 | 7029 |
| July 2021 | 61,463 | 4,729 | 2,369 | 7098 |
| October 2021 | 61,312 | 4,713 | 2,448 | 7161 |
| February 2022 | 61,296 | 4,627 | 2,612 | 7239 |
| July 2022 | 61,335 | 4,840 | 2,719 | 7559 |
| | -344 | -260 | +1,526 | +1266 |

4.2.6 Note in the above table that there is a reduction of 260 houses that used to pay the council tax premium between July 2018 and July 2022. During the same period the number of units that now pay the Non-domestic Business Rate has increased +1,526. For the same period, there are an additional 930 residential units (built within the Gwynedd Local Planning Authority and Eryri National Park area). It appears that the growth in the number of holiday lets is attributed to the transfer in use from domestic to non-domestic (Business Rates). Due to the existing system the financial benefits of transferring to pay the non-domestic business rate is a motivation for this transfer in use.

4.2.7 As expected, the highest provision of holiday homes is seen in the traditional areas of the Llŷn and Meirionnydd coast. However, recently it appears there is an increase in provision in the less traditional/urban locations. For example, in the Bangor area (including the Pentir Community Council area), back in July 2018 the rate of housing stock in holiday use (holiday accommodation or second homes) was 0.97%. By July 2022 the figure had increased to a rate of 2.38%. Although the percentage of housing stock in holiday use continues to be lower compared to other areas, this is a percentage increase of 141% over a period of four years. This is firm evidence that the number of holiday homes is generally increasing and is also spreading to less traditional areas of the county.

Part 3: Impact Assessment - Qualitative information

4.2.8 In section 3 of the paper an analysis of other relevant research in this field (second homes and holiday accommodation) is presented, as well as reference to the evidence used in that work to assess the impact.

4.2.9 Generally when considering and assessing the impact of holiday accommodation and second homes, there are obvious themes that permeate through the relevant research, namely:-

- The impact on the housing market
- Impact on community facilities
- Impact on the Welsh language

4.2.10 The analysis of this work highlights that the provision of holiday accommodation and second homes within communities affects the factors referred to above, however, it is noted that it is not possible to state without doubt that the negative side-effects are restricted to being associated with the provision of holiday homes only, with the other factors also having an influence.

Part 4: Assessing the Impact - Primary/quantitative information

4.2.11 Section 4 presents a primary analysis of the impact on communities at the expense of having a number or high density of holiday homes.

4.2.12 Inevitably the demand for holiday accommodation affects the ability of local people on lower wages to buy homes in popular holiday destinations. The median house price in Gwynedd (2021) was £175,000, with an average income of £26,315, the income to house price affordability ratio in the county is 6.7:1 (an increase from 5.9:1 in September 2019). This means that on average 65.5% of the Gwynedd population has been priced out of the housing market.

4.2.13 This statistic increases significantly in the wards where there is a higher number of holiday homes. For example, in the Abersoch ward where 54.08% of the housing stock is in holiday use (holiday accommodation or second homes), the average median price for a house is £482,500. With the average household income at £36,086, the house prices to affordability ratio is far beyond double the county average at 13.4:1, this means that 96.1% of local people have been priced out of the market.

4.2.14 Together with impacting on house prices and affordability the paper discusses the impact on the provision of social facilities that satisfy the needs of the local population together with the impact on the Welsh language.

Part 5: Intervention Options

4.2.15 Previously (prior to the changes in planning legislation), the ability of Local Authorities to control the housing market, i.e. who occupied the houses and the use made of them was restricted to new housing. The new measures introduced via the changes to planning legislation gives the power to issue the Article 4 Direction for a specific area and the ability to control the use made of residential dwellings (existing housing stock and new housing) for holiday purposes.

4.2.16 Alongside considering the propriety of implementing the Article 4 Direction, it is also appropriate to consider all the other control measures that can be implemented to get better control of the use of housing as holiday accommodation and second homes.

4.2.17 The other control measures that could be implemented now or that are being considered include:-

- Intervention via local planning policy; for example to limit the use of new housing to primary residences;
- Financial intervention: increase the second homes premium and amend the eligibility criteria for paying the non-domestic business rate;

- Licensing; Welsh Government has undertaken a consultation on the principle of implementing the mandatory licensing procedure for holiday accommodation providers.

4.2.18 It is noted that a package of control measures needs to be implemented to ensure the success of the broader objective sought to be achieved.

Part 6: Area Options for an Article 4 Direction

4.2.19 The evidence submitted in the paper highlights the need to implement and introduce the Article 4 Direction as a means of trying to reverse the side-effects of holiday homes on communities and to ensure fairness and opportunities for Gwynedd residents.

4.2.20 Consideration has been given to a series of options in terms of the area where the Article 4 Direction should be implemented, namely:-

- Option 1: Dwyfor (Government pilot area);
- Option 2: Community/Town/City Council areas where the current provision of holiday homes is greater than 15% of the housing stock;
- Option 3: Vulnerable Areas (areas under threat);
- Option 4: The whole of Gwynedd (Gwynedd Local Planning Authority Area)

4.2.21 In considering these options a detailed assessment of the relevant advantages and disadvantages has been undertaken. Furthermore, consideration has been given to how the intervention will have a positive impact on Gwynedd communities.

Part 7: Conclusions

4.2.22 Since implementing the Article 4 Direction in this way is unprecedented, it is not possible to anticipate or measure the implications that may derive from its implementation. It is anticipated that the potential impacts include:-

- Impact on the value of property on the open market;
- Will lead to an increase in the number of holiday homes in areas that are not subject to the same protection.

4.2.23 In order to seek to control the use made of residential housing and thus ensure there is appropriate provision of housing available to satisfy local needs, it is considered appropriate that the housing stock of the entire Local Planning Authority Area is protected by the introduction of the Article 4 Direction. By introducing the Article 4 Direction for the entire area this ensures that the amenities of the county's residents are protected. It also ensures that the vision and objectives of a range of relevant strategies and

policies are considered when assessing the propriety of the proposed development (in accordance with the local planning policy guidance). Furthermore it is noted that this method of introducing the Article 4 Direction will ensure there is no doubt regarding the geographical area where the intervention will be implemented and will ensure that the residents of the entire county are subject to the same intervention/protection.

4.2.24 Following the analysis of the options discussed in Part 6 of the paper, it is noted that the preferred option in terms of presenting the Article 4 Direction is: **Option 4: The whole of Gwynedd (Gwynedd Local Planning Authority Area)**. By taking this action, it is hoped that it will protect the vulnerable communities of Gwynedd in terms of their social, economic and cultural sustainability.

4.3 The Contents of the Article 4 Direction

4.3.1 It is possible to tailor the content of the Article 4 Direction to address what it seeks to achieve. With the aim of seeking to ensure that residential dwellings are protected for this purpose, it was concluded that the permitted development rights should be removed for the change of use of a residential dwelling (C3) into holiday use - be that a C5 or C6 use class. In the same manner, to facilitate the ability for second homes and short-term holiday lets (that have not been restricted via a planning condition) to transfer back into residential use, it is not considered appropriate to interfere with the ability to do this through the introduction of the Article 4 Direction. Therefore the unrestricted transfer from C5/C6 use to C3 use can continue. It is noted that the legislation allows for mixed uses of these use classes, for example change of use of being a pure C3 use to a mixed C3/C6 use. Following the above-mentioned principle to protect the residential housing stock, it is proposed to limit mixed use that would lead to the loss of pure principal residence uses. It is possible to examine the scope and details of the permitted development rights that are proposed to be removed by the introduction of the Article 4 Direction in the last section of the Justification Report (Appendix 1) along with the 'notice' and the Direction in Appendices 2 and 3.

5.0 THE PROCESS OF INTRODUCING AN ARTICLE 4 DIRECTION

5.1 Direction

5.1.1 It is a requirement to follow the procedures set out in legislation when introducing and implementing the Article 4 Direction. The procedure is outlined in the Town and Country Planning (Permitted General Development) Act 1995 as amended. In accordance with the latest amendment to the relevant legislation, it is possible to issue two types of Article 4 Direction, namely:-

- A Direction with immediate effect which means that the Article 4 Direction comes into force prior to public engagement.
 - A Direction that does not come into immediate effect which means that public engagement is held before the Article 4 Direction comes into force.
- 5.1.2 It is considered that there are advantages and disadvantages associated with both paths. It is emphasised that the right to compensation that would be payable in the context of an immediate effect Article 4 Direction, is a significant risk for the Authority. In light of the need to avoid having to pay compensation, it is considered that the option of implementing the non-immediate Article 4 Direction would be appropriate to protect the Council's interests. This will include issuing a 12 month notice prior to when the Article 4 Direction comes into force.

5.2 Issuing the 'Notice'

- 5.2.1 Subject to the Cabinet's decision, it is intended to issue the Article 4 Direction notice as soon as is possible after the decision. Issuing the notice will include:-
- a) A local advertisement;
 - b) A site advertisement for a minimum 6-week period.
- 5.2.2 The 'Notice' along with all associated documents (including the Justification Paper and the Article 4 Direction) will be available to view on the Council website at Siop Gwynedd (Caernarfon, Dolgellau and Pwllheli) and in county libraries.
- 5.2.3 As part of the process of issuing a notice, details will be included in relation to the opportunity to submit representations on the proposal. The statutory requirement is to hold an engagement period of at least 21 days. To facilitate the process of submitting representations it is intended to hold an engagement period that will last longer than the statutory requirement. The process of issuing the notice and the engagement period will be held during the summer of 2023.
- 5.2.4 To facilitate the process of submitting representations, consultation software will be used and promoted on the Council website. Correspondence in the form of e-mails or letters will also be welcomed.

5.3 Raising Awareness

- 5.3.1 As the proposal will have an effect on all residential properties across the Local Planning Authority Area, it is important to raise awareness and publicise it appropriately, thus ensuring there are opportunities to submit representations. There is a communications strategy in place for this element which has been developed jointly with the Communications Service and will involve incorporating the following as outlined below.
- 5.3.2 There will be a dedicated webpage on the Council's website (www.gwynedd.llyw.cymru/erthygl4) including all the relevant information to assist members of the public to understand the proposal and its implications. This page will include a series of questions and answers that will be amended as needed.
- 5.3.3 It is considered that using the Council's social media (Instagram, Facebook and Twitter) is also an extremely useful and a far-reaching method of raising awareness. Throughout the engagement period regular updates will be posted on social media.
- 5.3.4 As already outlined, in accordance with the regulations, the affected person is required to be notified of the intention if it is considered reasonable to do so as set out below:

by serving the notice on the owner and occupier of every part of the land within the area or site to which the direction relates, but this is subject to sub-paragraph (2).

(2) The local planning authority need not serve notice on an owner or occupier in accordance with sub-paragraph (1)(c), if they consider that—
(a) individual service on that owner or occupier is impracticable because it is difficult to identify or locate that person, or
(b) the number of owners or occupiers within the area to which the direction relates makes individual service impracticable, but this is subject to sub-paragraph (3).

3) Sub-paragraph (2) does not apply where the owner or occupier is a statutory undertaker or the Crown.

As outlined above there is no requirement to serve notice on every owner or occupier if it is impractical to do so, due to the size of the area or if it is difficult to identify or locate that person. However, due to the nature of the intention we want to raise extensive awareness with the residents of Gwynedd and therefore want to make every effort to inform all residential houses in the Gwynedd Local Planning Authority area of the intention through paper correspondence. This correspondence will include a letter of clarification along with a copy of the notice.

5.3.5 Further, a briefing session will be arranged for all Council members before the formal engagement period is held during the summer of 2023.

5.4 Confirmation

5.4.1 The Council will be required to give appropriate consideration to the representations received during the engagement period. It is intended to submit those representations to a meeting of the Cabinet along with the Council's response to the representations in the form of a Consultation Report. This information will be submitted as part of the information pack related to the Cabinet's decision whether or not to confirm the Article 4 Direction.

5.4.2 It is anticipated that the Report to confirm the intention will be submitted to the Cabinet during Autumn/Winter 2023 following the consultation period with the Article 4 Direction operational on the 1st September 2024 which is at least 12 months after the date of issuing the notice.

5.4.3 It is emphasised that the process in terms of obtaining approval of the proposal is relevant to the Gwynedd Local Planning Authority Area only. However, regular discussions take place with officers from the Eryri National Park Authority to ensure there is integration between the expectations and the timetable of both Local Planning Authorities in terms of implementing the Article 4 Direction. It will be a matter for the Eryri National Park to determine the path they wish to follow and obtain an approval to the proposal.

5.5 Considering the Impact

5.5.1 The Council is required (under the Equality Act 2010) to consider the impact that any change in any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. An Equality Impact Assessment should therefore be undertaken before any decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

5.5.2 The Council is also required, under the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or creating a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English.

5.5.3 Further, in accordance with the Socio-economic Duty that came into force in Wales on 31 March 2021 public bodies have a duty to consider how

strategic decisions, including setting objectives and developing public services, reducing inequalities in terms of the outcome for people who face socio-economic disadvantage.

- 5.5.4 To assess how the proposal of introducing the Article 4 Direction would affect the requirements noted above an integrated Equality Impact Assessment (Assessing Impact on Equality Characteristics, the Welsh language and Socio-Economic Disadvantage) has been completed. It is possible to view this Assessment in Appendix 4 of the papers.
- 5.5.5 The Assessment highlights that the proposal will have a positive impact on every individual including individuals with protected equality characteristics. The social inequality that currently exists in some communities due to the lack of affordable housing along with house prices that are beyond reach is creating an unsustainable divided society. In an effort to seek to overturn the current situation it is hoped that introducing the Article 4 Direction, will provide an opportunity to assess the propriety of any proposal that involves changing the use of a residential home to holiday use, be that use as a holiday let or a second home. It is hoped that this will create a fairer society and ensure opportunities for all to be able to live in their area of choice. It is therefore noted that reducing inequality that derives from socio-economic disadvantage is a core part of the reason why introducing the Article 4 Direction is needed. Further it was concluded that the new procedure would be more inclusive and would offer everyone an opportunity to have an input in the Planning process.
- 5.5.6 The assessment also concludes that introducing the Article 4 Direction would have a positive impact on the Welsh language and the balance of communities as it is hoped that it will stabilise the housing market and offer opportunities for people to be able to live in their communities.
- 5.5.7 Following the engagement period this Impact Assessment will be amended as needed and will be re-submitted to the Cabinet when making the final decision regarding the proposal.

5.6 The Well-being of Future Generations (Wales) Act 2015

- 5.6.1 Another important consideration is the Well-being of Future Generations (Wales) Act 2015. The Act seeks to improve Wales' social, economic, environmental and cultural well-being. The act places a well-being duty on public bodies which is aimed at delivering the seven well-being goals by following the five ways of working. The following table highlights these well-being aims and explains concisely how the proposal achieves the aims in question:-

| Aim | Explanation of how the proposal of introducing the Article 4 Direction delivers the aim |
|------------|--|
|------------|--|

| | |
|--|---|
| A prosperous Wales | It will offer opportunities for people to live and work in Gwynedd and will therefore mean there will be a stable, skilled and educated population to support the local economy. |
| A resilient Wales | It will lead to a fairer society and thus the county's social resilience will be maintained. |
| A healthier Wales | It will create a fairer society and thus would create circumstances for people to be able to live and work in Gwynedd, which in turn has a positive impact on health. |
| A more equal Wales | It will create a society that is more equal and will enable better opportunities for all. |
| A Wales of cohesive communities | It will be a means of creating attractive, viable and safe communities. |
| A Wales of Vibrant Culture and Thriving Welsh Language | It will offer better opportunities for people to be able to live in their communities and will be an indirect means of protecting culture, heritage and the Welsh language. |
| A Globally Responsible Wales | Although implementing the Article 4 Direction would be done on a local level in Gwynedd, the principle of creating a fairer society and offering better opportunities for people to live and work in their local communities thus creating viable and sustainable communities is an example of good practice. |

6.0 INTRODUCTION AND IMPLEMENTATION

- 6.1 To be able to assist with the process of introducing and implementing the Article 4 Direction and the additional burden this would mean for the Local Planning Authority, a formal application for additional resources submitted to the Welsh Government has been approved (up to the end of March 2026).
- 6.2 These additional resources will fund additional Planning Officers in the Planning Service in response to the inevitable increase that would derive in relation to applications, enquiries and associated complaints. This resource can also contribute to the work of preparing a new Local Development Plan for Gwynedd, and specifically any new planning policy involving second homes and short-term holiday lets.
- 6.3 It has to be acknowledged that the recruitment of additional planning officers for a temporary period is challenging, however the preparatory work for appointing/advertising jobs is ongoing.

Views of the statutory officers

The Monitoring Officer:

The Legal Service has worked closely with the authors on this matter including specialist external support, I am content with the propriety of the report and the decision sought.

Head of Finance Department:

The decision sought will not create an additional spending commitment, but it is noted that should the Order come into force it will inevitably increase pressure on officers within the Planning Service, and as the report highlights additional financial support will be available for a limited initial period.

I am satisfied that the financial information presented in the report with regards to local taxation legislation is correct.

Appendices

Appendix 1: Paper to justify issuing the Article 4 Direction

Appendix 2: Notice of the proposal

Appendix 3: Article 4 Direction

Appendix 4: Equality Impact Assessment