

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

Number: 2

Application Number: C25/0046/20/LL

Date Registered: 31/01/2025

Application Type: Full

Community: Y Felinheli

Ward: Bethel a'r Felinheli

Proposal: Change the use from Main Residence (C3) to Mixed Use - Second Home (5) and short-term Holiday Accommodation (C6)

Location: 79 Ffordd Glyder, Y Felinheli, Gwynedd, LL56 4QX

Summary of the Recommendation: TO REFUSE

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

1. Description:

- 1.1. This application is to change the use of 79 Ffordd y Glyder, Y Felinheli, from the current established use of a main residence (use class C3) into a second home mixed use (use class C5) and short-term holiday accommodation (use class C6).
- 1.2. This is a four-bedroom two-storey mid-terrace house located on a residential estate in a coastal site on the banks of the Menai Strait and within Y Felinheli coastal/rural village development boundary as shown on the Anglesey and Gwynedd Joint Local Development Plan's Inset Maps.
- 1.3. The property lies close to but outside of the Faenol Estate Special Landscape Area designation as noted in the LDP and within the Dinorwig Landscape of Outstanding Historic Interest designation. The site is close to The Menai Straits and Conwy Bay Special Area of Conservation (SAC) and very close to the Faenol Park Lake and Woodlands Wildlife Site.
- 1.4. The site is served by a private road off an unclassified road - Access to the Marina and the Hen Gei Llechi. Public footpath Number 25 Y Felinheli is located close to the site.
- 1.5. The development is close to a Coastal Management Area and it is shown on the border but outside a C2 Flood Zone in Flood Risk Maps, Technical Advice Note (TAN) 15: Development and Flood Risk nearby but outside Flood Zones 2/3 Seas in the Welsh Government's Flood Maps for Planning (MLIC) TAN:15.
- 1.6. It is submitted to the Planning Committee at the Local Member's request.

2. Article 4 Direction - Cyngor Gwynedd Planning Area

- 2.1 This has been operational since 1 September 2024 and removes specific permitted development rights, including the need to receive a planning permission to change the use of a residential main residence (use class C3) to Second Homes (use class C5) or short-term Holiday Accommodation (C6) or a mixed use of both use classes.

3. Relevant Policies:

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.
- 3.2 The Well-being of Future Generations (Wales) Act 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the seven well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

3.3 **Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017**

PS1: The Welsh Language and Culture

TRA 2: Parking Standards

TRA 4: Managing transport impacts

PS 5: Sustainable development

PS 6: Alleviating and adapting to the effects of climate change

PCYFF 1: Development Boundaries

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PCYFF 4: Design and Landscaping

ARNA 1: Coastal Change Management Area

PS 14: The visitor economy

TWR 2: Holiday accommodation

TAI 8: An appropriate mix of housing

PS19: Conserve and where appropriate enhance the natural environment

AMG 5: Local Biodiversity Conservation

Supplementary Planning Guidance: Tourist Facilities and Accommodation

Supplementary Planning Guidance: Maintaining and Creating Distinctive and Sustainable Communities

3.4 **National Policies:**

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 12 - February 2024)

Technical Advice Note 15: Development and Flood Risk

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

4. Relevant Planning History:

- 4.1 Y24/1065 Pre-planning Application Advice - Confirmation that planning permission is required to change the use - 23/01/2025
- 4.2 3/20/29/D The outline planning application relating to proposed mixed residential/commercial leisure facilities and ancillary maritime development including the levelling of the land - Approved with conditions by the Secretary of State 16/01/1987
- 4.3 2/5/356A (Outline) Residential Development including a marina - Approved 20/01/1970
- 4.4 2/4/74A An outline application for the development of marina including living accommodation, shops, club house, stores, restaurant, amenity buildings and parking garages and facilities for berthing and repairing boats - Approved 11/04/1967

5. Consultations:

Community/Town Council: The above application was discussed at the Council's February meeting.

The Council objects to the application on the following grounds:

- 1. The application claims that the estate was designed to be a holiday estate, but this is no longer the case as most people rent the houses as residential homes.
- 2. It is believed that the figure of 5.5% of houses in Y Felinheli is not correct, this may be the number of registered ones and not the total number of registered and unoccupied holiday homes.
- 3. Housing stock in Y Felinheli is low and there is a high demand from local people for homes. There are already 63 AirBnBs in Y Felinheli which take away houses that could be rented to local people.
- 4. In addition, the Council is not satisfied that such requests can be decided by officers. This is a contentious topic and the applications need to be considered by the Planning Committee.

Transportation Unit: I refer to the above application and I confirm that the transportation unit does not have any objection to the proposal.

Senior Rights of Way Unit Officer (Transportation and Countryside Service): It does not appear that there are any Rights of Way recorded that will be affected by this proposal.

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

Welsh Water:

We advise that the proposed development site is crossed by public watermain, with the approximate position being marked on the attached plan. In accordance with the Water Industry Act 1991, Dŵr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs.

Having no regard to plans submitted as part of this planning application, it appears that no new operational development is proposed within the protection zone of the public watermain measured 3 metres either side of the centreline. Notwithstanding this, we would advise of the need to accurately locate the assets on site as our record plans are a general guidance only and should not be relied upon in the event of excavations or other works made in the vicinity of the assets. We would need to carry out the survey work and would suggest that the developer contact our colleagues at PlanandProtect@dwrcymru.com for a quotation. We enclose our Conditions for Development near Watermains and advise that the developer must contact Dŵr Cymru Welsh Water before any development commences on site.

Turning towards drainage matters, the application appears to rely on existing sewer connections and no new connections are to be made with the public sewerage system. Nonetheless, for the avoidance of doubt, we would request if minded to grant planning consent that the following Condition and Advisory Notes are included to ensure no detriment to existing residents or the environment and to Dŵr Cymru Welsh Water's assets:

Condition

No surface water from any increase in the roof area of the building /or impermeable surfaces within its curtilage shall be allowed to drain directly or indirectly to the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

Advisory Notes

As of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. The development may therefore require approval of Sustainable Drainage

Systems (SuDS) features, from the determining SuDS Approval Body (SAB), in accordance with the 'Statutory standards for sustainable drainage systems - designing, constructing, operating and maintaining surface water drainage systems'.

The applicant is also advised that some public sewers and lateral

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dŵr Cymru Welsh Water to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dŵr Cymru Welsh Water has rights of access to its apparatus at all times.

The planning permission hereby granted does not extend any rights to carry out any works to the public sewerage or water supply systems without first having obtained the necessary permissions required by the Water industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information on water and sewerage connections.

In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption.

We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

Public Consultation:

A notice was posted on the site and nearby residents were notified. The advertisement period had expired and one letter supporting the application was received, as well as two items of correspondence objecting on the following grounds:

- Negative impact on the community and the culture of the village, Y Felinheli is a living village, not a holiday village.
- Loss of permanent home for Welsh speakers.
- One less residential place for people to be able to live in and speak or learn the Welsh language.
- Opportunities for young people to rent and purchase a home in Y Felinheli are difficult due to the high numbers of holiday accommodation.
- The longevity of the community is impacted by an over-

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

- concentration of holiday accommodation.
- Local people have to move from the area as there are not enough affordable houses in the area.

6. Background

6.1 Amendments were introduced to the Planning legislation on 20 October 2022 where the Town and Country Planning (Use Classes) Order 1987 was updated in relation to class C3 dwelling houses. The amendment introduces two new use classes to class C, to differentiate the use of primary residence, second homes and short-term holiday accommodation. Previously all of these would fall into use class C3 dwelling house. The amendment includes the definitions below:

6.2 **Class C3 Dwelling House: Primary Residences** used as a main residence.

Class C5 Dwelling House: Secondary Homes (Second home) that are used as a dwelling house but not as a main residence and occupied for fewer than 183 days in a year.

C6 Class: Short-term holiday lets that use a house as a commercial short-term let for periods no longer than 31 days for each period of occupancy.

6.3 To correspond with the amendments of the above Order, on the same date, the Town and Country Planning Order (Permitted General Development etc.) (Amendment) (Wales) 2022 was amended to allow change between the C3, C5 and C6 use classes without restriction, unless that the Article 4 Direction has been implemented by the Local Planning Authority that limits the ability to change between the use classes.

6.4 The Cyngor Gwynedd Cabinet (16/7/24) has confirmed the Article 4 Direction in the Cyngor Gwynedd Planning Area, which came into effect on 1 September 2024. It removes development rights, making it a requirement to receive Planning Permission to change use of a property to a house that is not used as a main residence (i.e. second home) (C5) or to short-term holiday accommodation (C6) or between the two uses, excluding changing a property back to a main dwelling (C3).

7. Assessment of the material planning considerations:

The principle of the development

7.1 The two-bedroom property lies in the middle of a terrace on a residential estate in a coastal site on the banks of the Menai Strait within Y Felinheli development boundary as shown on the Anglesey and Gwynedd Joint Local Development Plan's (LDP) Inset Map. The proposal relates to a change of property use which was last used as a Main Residence (C3) to a short-term Holiday Accommodation mixed use (C6) and Second Home (5). A Planning Application Statement was submitted by the applicant, emphasising that the property had been used as a second home by the family for 25 years, but their late father had retired and lived on the property as his main residence until his death in October 2024. As the property's last established use was a main residence use (C3) until the presentation of the Article 4 Direction on 1 September 2024, the use of main residence (C3) would compromise any historical second home use (C5).

7.2 Attention must be drawn to the current situation in the Cyngor Gwynedd Planning Area of implementing the Article 4 Direction since 1 September 2024. The Direction was introduced as a result of Cyngor Gwynedd conducting research in 2020 on 'Managing the Use of dwellings as holiday homes', which highlights that the highest percentage of second homes and short-term

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

holiday accommodation in Wales can be found in Gwynedd, to reduce the pressure of converting current homes into holiday units and second homes.

- 7.3 As the proposal is partly for a change of use to C6, the propriety of the proposal should be considered in accordance with the policy guidance and the criteria requirements of policy TWR 2: Holiday Accommodation of the JLDP as follows:
- i. In the case of accommodation, which is a new build, that the development is located within a development boundary, or makes use of a suitable previously developed site;
 - ii. That the proposed development is of appropriate scale considering the site, location and/or settlement in question;
 - iii. The proposal does not lead to a loss in the permanent housing stock;
 - iv. That the development is not located in a mainly residential area, and does not cause significant harm to the residential character of the area;
 - v. That the development does not lead to an over-concentration of such accommodation within the area.
- 7.4 Criteria i and ii can be disregarded as they relate to new buildings, but appropriate consideration must be given to the compliance of the proposal with criterion 'iii-v' of the policy.
- 7.5 Criterion iii notes the need to ensure that the proposal would not result in a loss of permanent housing stock. As the last established use of the property was as a residential unit in C3 use, it is considered that the proposal would lead to a loss in the permanent housing stock, and as such the proposal does not comply with the requirements of criterion iii.
- 7.6 It is noted in the Map Gwynedd system that the majority of the estate's dwellings are residential units, which include permanent dwellings and established second homes with only a small number having shown to be business/holiday accommodation use. Criterion iv states that a holiday development must not be located in a primary residence area or cause significant harm to the residential character of the area. Often, the activity nature of holiday use is different to residential use, and an inconsistent coming-and-going pattern by different groups of people could cause disturbance. It is considered that holiday use has the potential to change and harm the residential character of the area and the community contrary to the requirements of criterion iv policy TWR 2.
- 7.7 In terms of criterion 'v', it is noted that the development should not lead to an over-concentration of such accommodation in the area. Criterion 'v' is further elaborated upon in paragraph 6.3.67 of the policy. In order to prove that there is no over-provision of this type of accommodation, applicants are required to submit a detailed Business Plan which demonstrates the robustness of the proposed scheme.
- 7.8 It is noted that a Business Plan has been submitted as part of an accompanying letter to support the proposal. However, it is not considered that this information meets the needs of criterion v of policy TWR2. Guidance is provided on the type of information that should be included in a Business Plan in Appendix 4 (Business Plan Template) from Supplementary Planning Guidance (SPG): Tourist Facilities and Accommodation, but the Business Plan did not address information about the current market and the competition and details regarding their target market, customers' needs and their way of meeting those needs.
- 7.9 A copy of the SPG was provided and the applicant's attention was drawn to the Business Plan template, Appendix 4 to give them an opportunity to provide more information. A Business Plan was later received but it was considered that the information continued to be insufficient, without

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

giving consideration to all the matters in the template. We did not go back to the applicant to ask for more details as the information would likely not influence the decision. Due to the lack of information, it is not possible to come to a conclusion regarding the proposal's compliance with criterion 'v' of Policy TWR 2.

- 7.10 In addition, the Tourist Facilities and Holiday Accommodation (March 2021) SPG notes that favourable consideration should not be given to applications for holiday accommodation when 15% or more of the housing stock is in holiday use (including second homes and dedicated holiday accommodation). In accordance with Council Tax figures (December 2024), it is noted that the combined total of second homes and short-term holiday accommodation in Y Felinheli Community Council area is 9.51%, therefore Y Felinheli has not yet reached the 15% threshold set in the SPG.
- 7.11 Having considered the proposal's holiday accommodation element, it is concluded that the proposal does not meet the requirements of criterion iii-v of policy TWR 2 of the LDP.
- 7.12 Although there is no relevant specific policy to the principle of changing the use of a main residence (C3) to the use of a second home (C5), there is clear policy guidance within the Plan in terms of ensuring balanced, healthy and viable communities which have an appropriate mix of housing to meet the needs of the local community.
- 7.13 Policy TAI 8: Housing Mix notes the need to promote sustainable mixed communities by ensuring that all new residential developments contribute to improving the balance of housing and meet the identified needs of the whole community. The criteria that contribute toward this aim include:-
- 2. Contributing to redress an identified imbalance in local housing markets.
 - 4. Ensuring the correct mix of housing unit types and tenures to meet the needs of the Plan area's current and future communities;
- 7.14 Therefore, when considering applications for the loss of current residential main residence use (use class C3) to second home (C5) and short-term holiday accommodation (C6) mixed use, it should be considered whether the proposal makes up for the lack of balance in local housing markets (criterion 2, Policy TAI 8).
- 7.15 It does not appear that the property has been put on the market or any mention that the applicants have tried to rent the property as C3 main residence. It is believed that approving the change of use to a short-term holiday accommodation and second home mixed use in this case would conflict with criterion 2 of the policy as it would not ensure a positive contribution towards improving the lack of balance in the local housing market. In addition, it is also considered, based on the evidence presented, that it would undermine criterion 4 as the use of second homes and short-term holiday accommodation would not ensure a correct balance of tenures to fulfil the needs of the area's current local communities, as well as future communities.
- 7.16 Given the rationale of the Authority for introducing the Article 4 Direction, as well as the attempt of planning policies to try to ensure sustainable communities, it is considered that the proposal would be contrary to criteria 2 and 4 of policy TAI 8 of the LDP.

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

Visual amenities

- 7.17 The proposal would not mean any external change to the main property, only a change to its use from main residence (C3) to second home use (C5). The proposal is therefore acceptable in terms of policy PCYFF 3 of the LDP.

General and residential amenities

- 7.18 It is emphasised that the impact of holiday accommodation differs from the impact of C3 residential use and as such consideration should be given to the potential impact the holiday use may have on neighbouring residential users. There is concern that approving the use of a commercial holiday accommodation in an area that is mainly residential could have a negative impact on the amenities of local occupiers. It is considered that the use of holiday accommodation could lead to noise and disturbance which would be harmful to the living conditions of local occupiers, contrary to criterion iv policy TWR 2 and criterion 7 policy PCYFF 2 of the LDP, which relate to protecting the amenities of local occupiers.

Transport and access matters

- 7.19 The proposal does not demonstrate any change to the property's entrance and there is plenty of parking space in the curtilage. Changing the use of the property to a second home or holiday accommodation would not likely cause any change to the transport levels or difference in terms of road safety and parking. The proposal is therefore acceptable based on policies TRA 2 and TRA 4 of the LDP.

The Welsh Language

- 7.20 In accordance with the Planning (Wales) Act 2015, it is a duty when determining a Planning application to consider the Welsh language, and this is reiterated in paragraph 3.28 of Planning Policy Wales (Edition 12, 2024) and Technical Advice Note 20.
- 7.21 In Gwynedd, the SPG 'Maintaining and Creating Unique and Sustainable Communities' provides guidance on how it is expected for language considerations to be incorporated in each development with policy PS1 setting thresholds for when it is expected to submit a language Report/Statement. The proposed development does not reach the thresholds in the policy. The policy states that some types of retail, commercial or industrial developments must consider the Welsh language. It is noted that a reference to consideration of the Welsh language has been submitted as part of a supporting letter in support of the proposal, noting that they would keep a collection of books at the property about the local area, history and the Welsh language. It was added in the additional information that they would use a Welsh name when advertising the house and provide a welcome pack to welcome the visitors bilingually. Some consideration has been given to the Welsh language and is therefore in accordance with the principles of policy PS1 of the LDP.

Biodiversity and Green Infrastructure Matters

- 7.22 Paragraph 6.2.12 of Planning Policy Wales (Edition 12, 2024) notes that "A green infrastructure statement should be submitted with all planning applications. This statement will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal."

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

- 7.23 A Green Infrastructure Statement was submitted as additional information on the application. The statement does not include any Biodiversity improvements on the site itself as part of the development. It is argued that there are already vast areas of green land on the estate. They propose that they fund and provide Biodiversity improvements indirectly by using Sykes Cottages, a holiday cottages lettings company, who is committed to working with biodiversity projects across the regions in which the company operates; - reduce and dispose of single-use plastics from the business; - Positively impact at least 10 community and charity enterprises a year. It is considered that the Green Infrastructure Statement which is part of the application is insufficient, as it does not propose any biodiversity improvements to the site itself, although external space is linked to the property and there is no explanation why this is not possible. It is not considered that the Green Infrastructure Statement meets the requirements of Planning Policy Wales (Edition 12, February 2024) as it does not propose improvements to the application site, but it is possible to impose a condition to ensure improvements to meet the requirements of Planning Policy Wales.

Coastal Management Area / Flood Zones

- 7.24 The property lies on the banks of the Menai Strait next to a Coastal Change Management Area (CCMA) and is on the border but outside a C2 Flood Zone in Flood Risk Maps, Technical Advice Note (TAN) 15: Development and Flood Risk and adjacent to but outside Flood Zones 2/3 Seas in the Welsh Government's Flood Maps for Planning (FMFP) TAN:15. As this area of the shoreline has not been included in the LDP's appendix 6 list, it could disregard the requirements of policy ARNA 1. Likewise, as the site itself is outside Flood Zones C2 and 2/3, it is not a requirement to assess the application under the requirements of TAN 15 and policy PS 6 of the LDP. It must be acknowledged that changing the use of the property from its established use as a main residence to a mixed holiday accommodation and second home use would not exacerbate the situation or intensify the use to what has already been proven on the site.
- 7.25 Since the submission of the application, Welsh Government have published a revised TAN 15 on the 31st of March 2025. The revised TAN 15 is titled 'Development, flooding and coastal erosion' and is accompanied by Circular 002/2025 'Guidance on The Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025' and clarification letter from the Chief Planner of the Welsh Government's Planning Directorate.
- 7.26 Section 1 of the new TAN 15 states ***"This document replaces Technical Advice Note 14, published in 1998 and Technical Advice Note 15, published in 2004. Development Plans and planning decisions should no longer refer to those documents."***
- 7.27 However, the clarification letter states ***"...the publication of new guidance may have impacts on the processing of planning applications so there will be a transitional period for the implementation of the TAN. Planning applications which were submitted and registered before the publication of the new TAN will continue to be assessed against the previous version..."***
- 7.28 Therefore, official guidance from the Welsh Government is for planning applications submitted and registered prior to the 31st of March 2025 is for assessment of flood risk to be made on the policy content of the 1st edition of TAN 15 published in 2004.

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

Other matters

- 7.29 As part of the application, documents were submitted by the applicant, a part of an Inspector report dated March 1970 following a Planning Appeal from 'Port Dinorwic Holiday Development Company' relating to historical Planning applications to (i) develop the Quay, Port Dinorwic with residential accommodation, shops, stores, amenity buildings, repairing and renovating facilitators, car parks, garages and facilities (ii) develop the land of Plas Dinorwic, Port Dinorwic with cottages, chalets and caravans accommodation. The applicant draws attention to the fact that the Inspector acknowledges that the proposed plans are mainly for the purpose of holiday or leisure.
- 7.30 Having inspected the Planning history of the site, it is noted that there is no planning condition restricting the use of the units to a holiday or second home use only; the permission was therefore for the use of C3 main residence where the freedom to change between the uses was without limitation and they all came under the definition of a C3 dwelling. A copy was also provided in terms of the actions of the property, namely the Conveyance of the property between the seller, Port Dinorwic Yacht Harbour Limited and the buyer, namely the applicant's parents, in November 1991, which includes obstructive covenants which note that the property should not be used for any purpose except for a self-contained private dwelling to be occupied by one family only except that this would not restrict holiday accommodation. The presence of covenants is not a material consideration for Planning applications, therefore they are irrelevant to this application.

8. Conclusions:

- 8.1 Having weighed up the proposal against the relevant local and national policies and having given full consideration to the response received and the objections, it is concluded that the proposal in essence is contrary to the requirements of policy TWR 2 of the LDP. There is also concern about the impact of holiday accommodation use on nearby residential amenities and the lack of information in the application relating to a Business plan. It is also considered contrary to policy TAI 8 of the LDP as it would not contribute positively to creating sustainable communities. Although some matters are acceptable, having considered the application carefully, it is assessed that there is no choice but to refuse the application.

9. Recommendation:

- 9.1 To refuse – reasons –
1. The proposal would result in a loss of permanent housing stock contrary to the requirements of criterion iii of policy TWR 2: Holiday Accommodation, Anglesey and Gwynedd Joint Local Development Plan and Supplementary Planning Guidance: Tourist Facilities and Holiday Accommodation (2021).
 2. Changing the use of main residence (C3) to partly a short-term holiday accommodation (C6), which has a different nature of activity and movement to residential use, would likely cause general disruption and noise to a primary residential estate, having a detrimental impact on the amenities and living conditions of the local occupants, therefore it is contrary to the requirements of criterion iv of policy TWR 2: Holiday accommodation and criterion 7 of policy PCYFF 2: Development Criteria of the Anglesey and Gwynedd Joint Local Development Plan.
 3. Based on the information submitted with the application, it is unclear whether there is a need for the holiday accommodation proposed here. The Business Plan submitted is not detailed enough to justify the need and no evidence/details were submitted regarding the current provision of holiday accommodation in the local market or explanation on how the business would compete with established enterprises. Without sufficient information regarding the function of the holiday

PLANNING COMMITTEE	DATE: 28/04/2025
ASSISTANT HEAD OF DEPARTMENT REPORT	

unit, it is believed that the proposal would be contrary to the relevant requirements of local policies PCYFF 1 and TWR 2 of the Anglesey and Gwynedd Joint Local Development Plan, as well as the relevant requirements of Supplementary Planning Guidance: Tourist Facilities and Accommodation (2021).

4. Allowing the change of use for the property to a mixed use second home (C5) and short-term holiday accommodation use (C6) would compromise the requirements of policy TAI 8 An Appropriate Housing Mix and the aim of contributing towards creating sustainable mixed communities. It would conflict with the requirements of criterion 2, in the sense that it would then not contribute positively towards improving the balance in the local housing market. It would also undermine criterion 4, as the use of second home and short-term holiday accommodation would not ensure the correct mix of tenures to meet the needs of local communities. The proposal is therefore contrary to the requirements of policy TAI 8 of the Anglesey and Gwynedd Joint Local Development Plan.