

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

**Number: 6**

**Application Number: C24/1100/15/LL**

**Date Registered: 19/02/2025**

**Application Type: Full**

**Community: Llanberis**

**Ward: Llanberis**

**Proposal: Change of use of 5 residential flats (C3) to 5 short-term holiday accommodation units (C6)**

**Location: Compton House, High Street, Llanberis, Caernarfon, Gwynedd, LL55 4EU**

**Summary of the Recommendation: TO REFUSE**

<b>PLANNING COMMITTEE</b>	<b>DATE: 28/04/2025</b>
<b>REPORT OF THE ASSISTANT HEAD OF DEPARTMENT</b>	

## **1. Description:**

- 1.1. The application involves change of use of 5 residential flats (C3) at the Compton House, Llanberis property to 5 short-term holiday accommodation units (C6). It is a three-storey, end-of-terrace property, with one flat on each floor and two other flats on the first and second floors of the adjoining property above the former pharmacy which is now vacant. It is not intended to undertake any changes to the exterior and the vacant shop is not part of the application.
- 1.2. The building lies in a prominent location on the High Street, Llanberis within the Town Centre designation and within the Urban Service Centre Development Boundary. There is a mix of commercial and residential uses in the vicinity. The site lies within Flood zone C2 in Flood Risk Maps, Technical Advice Note (TAN) 15: Development and Flood Risk and in Zone 3/2 Rivers defended zone in Flood Maps for Planning (FMfP). The site also lies within the Dinorwig Registered Historic Landscape. The site is served by a class 3 county road, Llanberis High Street.
- 1.3. As part of the application, an application form was submitted as well as a location plan, current/proposed plans, Design Statement, Access Statement and a Green Infrastructure Statement. A Business Plan and Welsh Language Statement were also submitted as additional information.
- 1.4. The application is brought to the Planning Committee as the development consists of 5 or more units.

## **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 planning permission to change the use of a residential main residence (use class C3) to a second home (use class C5) or short-term holiday accommodation (use class 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 in accordance with the Development Plan, unless material planning 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.
- 3.3 **Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017**  
  
PS1: The Welsh Language and Culture  
  
PS 5: Sustainable development  
  
PCYFF 1: Development Boundaries

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

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PCYFF 4: Design and Landscaping

PS 14: The visitor economy

TWR 2: Holiday accommodation

TRA 2: Parking standards

TRA 4: Managing transport impacts

PS19: Conserve and where appropriate enhance the natural environment

AMG 5: Local Biodiversity Conservation

PS 20: Safeguard and where relevant improve heritage assets

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 11 - February 2021)

Technical Advice Note (TAN) 13: Tourism

Technical Advice Note (TAN) 15: Development and Flood Risk (2004)

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion (31 March 2025)

Technical Advice Note (TAN) 18: Transport

Technical Advice Note (TAN) 20: Planning and the Welsh Language

## 4. **Relevant Planning History:**

### 4.1 C96A/0129/15/CL Extension to Compton House: Approved 31 July 1996

There were no pre-application enquiries regarding the proposal.

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

## 5. Consultations:

Llanberis and Nant Peris  
Community Council:

**OBJECTION** The Council was unanimous in objecting to the application. Several verbal objections have been received from the residents of the village. The building is currently a building for long-term rentals which helps with providing homes to local people. Changing the site to a building offering hospitality flats ensures an adverse impact on the Community because of the impact on the Welsh language, homes for local people and pupil numbers within the primary school. Llanberis and Nant Peris have a high proportion of Airbnb houses and flats and holiday homes. Although a number is provided in the documents, this number is not the correct number because there are so many houses not registered as holiday homes, etc. Local people are unable to remain within their communities to raise families because no affordable houses are available. The Council acknowledges that visitors contribute to the local economy, but it can also affect the local area. There is an over-provision of holiday homes in the village. This development will also have an impact on transport and parking within the village. The Council supports the stance of Councillor Gwilym Evans and that of Cylch yr Iaith.

Transportation Unit:

### Observations 13 January 2025

The site does not have any obvious off-street parking and I am concerned that holiday units are more likely to generate a demand for parking than their current function as residential units. I ask that the applicant provides a statement outlining the foreseen parking arrangements associated with the development.

### Observations 18 March 2025

Not enough information has been provided to determine if the parking area would be adequate. I ask that a plan is provided showing the parking arrangements within the site to demonstrate how many vehicles could be provided for. The plan should show the dimensions of the site and confirm the size of the parking bays proposed

Natural Resources Wales:

We have no objection to the proposed development as submitted and provide the following advice.

### **Flood Risk**

With regards to Flood risk, we would advise that the application form has been completed incorrectly as the site is within an area at risk of flooding and did indeed flood during November 2012. This is

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

reflected in the site being within DAM zone C2 and zones 3/2 in the Flood Map for Planning.

Your Authority will have carried out flood alleviation measures on the Afon Goch in Llanberis, that will have reduced the risk of flooding, but not eliminate the risk.

As the proposal does not intensify the number of units on the application site and in the absence of a flood consequences assessment, we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development for the ground floor unit.

In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development. These could include flood barriers on ground floor doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels. We refer the applicant to our website for further advice and guidance is available. Additional guidance including the leaflet “Prepare your property for flooding” can be found here.

### **Protected Sites**

The site lies within 100 metres to the Llyn Padarn Site of Special Scientific Interest (SSSI). We consider that the proposed development is not likely to damage the features for which Llyn Padarn SSSI is of special interest.

### **Protected Species**

We note that there is no information about protected species with the application, and therefore are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

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

Public Consultation:

A notice was posted on site and nearby residents were informed. The advertising period has ended, and correspondence was received from the Local Councillor, Cylch yr Iaith and an individual providing observations/objecting to the application on the following grounds:

- An excess of holiday accommodation/Airbnbs in the village already - shrinking the housing stock.
- Housing/flats for local people needed - to retain local services, shops and a school in the area.
- Contrary to policy TWR 2 of the LDP.
- Overtourism - Supplementary Planning Guidance states that no more should be allowed in communities with a high concentration of second homes/holiday accommodation. Bordering two Community Council areas with over 15% holiday accommodation/second homes, therefore a vulnerable area.
- Article 4 - a long-term aim of creating sustainable communities.
- A detrimental impact on communities.
- A negative impact on the Welsh language - Census figures show a reduction in the number of Welsh speakers in Llanberis resulting in concern about the situation of the language in the area.
- The Welsh Language Assessment is inadequate and does not give fair consideration to the language.
- Holiday accommodation influences property prices that go beyond the reach of locals.
- Parking - where will the visitors park their cars?
- A thriving village is needed - not a dying village that only caters for tourists.
- A negative effect on bed and breakfast businesses.

## 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:

**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.

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

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

- 6.3 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 / is used as a 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 relevant planning considerations:

### The principle of the development

- 7.1 The property stands in a central location on the High Street in the Llanberis Local Service Centre within the development boundary as defined in the Joint Anglesey and Gwynedd Local Development Plan (JLDP). The proposal involves changing the use of 5 residential units (use class C3) to 5 short-term self-catering holiday lets (use class C6). The proposal does not involve any external/internal structural alterations, only a change of use of the units. The main consideration therefore is Policy TWR 2: Holiday Accommodation of the Joint LDP and the relevant criteria;
- 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.
- 7.2 Criterion 'i' is not relevant to the change of use element, as they are existing residential units. There would be no change to the scale of the building if it was converted into a holiday unit, so it is not considered contrary to criterion ii.
- 7.3 Criterion iii notes the need to ensure that the proposal would not result in a loss of permanent housing stock. As the established use of the 5 units is as permanent residence/main home (C3) use, the change of use to 5 holiday units would result in a loss in the permanent housing stock and as a result would contravene the requirements of criterion iii of policy TWR 2. No information was received to explain the background to the proposal. It is not clear whether any effort was made to market the properties for sale as residential units or attempt to rent them out to residents as C3 units. In the absence of evidence for the need to change use, it is not considered that there is justification to contravene the policy in this case.
- 7.4 It is emphasised that the Article 4 Direction is in force in the Gwynedd Local Planning Authority Area since 1 September 2024, and this is the reason for the requirement to submit an application for change of use. The Direction manages the transfer in use from residential dwellings to holiday use (second homes and holiday accommodation) to enable better management of the housing stock in our communities. The Direction was introduced as a result of Cyngor Gwynedd conducting research in 2020 on 'Managing the Use of dwellings and holiday homes', which highlights that the highest percentage of second homes and short-term holiday accommodation in Wales can be found in Gwynedd. There are concerns that enabling change of use would not only be contrary to policy TWR 2 but that it would not reduce the pressures that have been identified in converting existing homes into holiday units and second homes.

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

- 7.5 Due to the location of the property on the High Street, there are a variety of businesses and residential units in the vicinity of the application. It must be recognised that holiday accommodation use has the potential to create noise and disturbance, as the nature of holiday use activity is often different from residential use, with a pattern of inconsistent comings and goings by different groups of people which may cause disturbance. Given the location of the building on the High Street, where there is constant activity and a variety of use present, it is not believed that holiday use would cause harm to the character of the area nor is the use likely to cause disturbance that is significantly different to the present use in this case.
- 7.6 In discussing amenities therefore, it is not anticipated that there will be significant harm to local occupants in terms of activity, disturbance and noise to what is currently experienced in a High Street setting. Therefore, it is considered that the proposal also satisfies the requirements of criterion 7 of policy PCYFF 2 of the LDP, which relates to safeguarding the amenities of local residents.
- 7.7 Regarding criterion 'v' of Policy TWR 2, this notes that the development should not lead to an over-concentration of such accommodation within the area. Criterion 'v' is further elaborated upon in paragraph 6.3.67 of the policy which requires a Business Plan to be submitted on applications for holiday accommodation. Further guidance and an example of a Business Plan template can be found in the Supplementary Planning Guidance (SPG): Tourist Facilities and Accommodation. The Business Plan is not expected to be a lengthy and complicated document, but it should be proven that there is no over-provision of this type of accommodation in the area, demonstrating the robustness of the proposed scheme. A Business Plan (Confidential) was submitted as additional information on the application. The Business Plan states that, subject to receipt of planning permission, the company intends to take a long-term lease to use the building as short-term holiday accommodation. The current developer and business are based in north Wales and operate with Airbnb, Booking.com, Expedia, Travelstaytion and many other agencies. It is stated that the proposal would be a high-quality development which would bring the building back into use thus benefiting the economy and it is argued that the provision would not denigrate or affect the local housing market.
- 7.8 Having assessed the Business Plan, it is not considered that the essential information has been included within the Business Plan. An essential element expected in a Business Plan is the need to include an analysis of the current provision of holiday accommodation within the local area, and how the additional units would contribute and add in a positive way. It is not considered that there is sufficient information in the Business Plan to assess the robustness of the plan and to establish whether the proposal has a realistic hope of being viable, and that the proposal is not 'speculative'. Due to the lack of information, it is impossible to reach a conclusion as to whether there is actual justification to approve a change of use of the units to 5 holiday lets and therefore the proposal does not comply with the requirements of criterion 'v' of Policy TWR 2. As the information would be unlikely to influence our recommendation, we did not ask the agent/applicant to incur costs in submitting further information.
- 7.9 Furthermore, the SPG states 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). As per Council Tax figures (December 2024) the combined total of second homes and holiday accommodation in the Llanberis Community Council area is 9.16%, therefore the threshold has not been reached.
- 7.10 It should be noted that an objection has been received to the proposal which raises concerns about the current situation in the village, suggesting that there is an excess of holiday accommodation



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

such as Airbnbs in the village, which has a far-reaching impact on the housing stock situation. It is argued that the village is experiencing over-tourism and is in a vulnerable situation as it borders both the Beddgelert and Betws Garmon Community Council areas (within Eryri National Park) which have high numbers of holiday accommodation/second homes. They also express concern about the detrimental impact of holiday units on the community, emphasising that local people are needed to stay and maintain services all year round and not over-rely on tourism. It was noted that the objectors' concerns were justified.

- 7.11 Having given full consideration to the proposal against the requirements of policy TWR 2 of the LDP, it is concluded that the proposal is contrary to criteria iii and v of the policy which presume against the loss of permanent housing stock. It is a concern that the loss of as many as 5 residential units of a given size would have a detrimental effect on the housing stock. Insufficient information has been submitted in the Business Plan to satisfy criterion v, to prove that there is a genuine need for such holiday accommodation.

### **Visual amenities**

- 7.12 The proposal would not involve any external structural change to the main dwelling, only a change in use from 5 residential flats/main residences (C3) to 5 units for short-term holiday accommodation use (C6). There would therefore be no visual impact that would have a detrimental effect on the visual amenities of the area or on the wider Dinorwig Registered Landscape of Historic Interest. The proposal is therefore acceptable in terms of policy PCYFF 3 and AT 1 of the LDP.

### **Transport and access matters**

- 7.13 The building lies in a central location on the High Street, Llanberis and is served by a Class 3 county road. The Transportation Unit submitted observations concerned that holiday units would be more likely to create a demand for parking provision compared to its established function as residential units. In response to the observations, a revised location plan showing an external space at the rear of the property and associated photographs of the hard surface area at the rear were received. In its additional observations, the Transportation Unit requests a site plan showing the dimensions and the number of vehicles that can be provided for. There is doubt as to whether the space shown is wide enough to create convenient parking provision, with adequate passing, turning and parking space for vehicles. It must be acknowledged that parking problems are being experienced in Llanberis and the objectors have raised the question of where the visitors would park.
- 7.14 It must be noted that the site is accessible on the High Street and convenient for pedestrians, cyclists, cars and users of public buses. It can be considered a sustainable location in that regard, which would meet the requirements of policy PS5. There may not be a significant difference in the levels of transport for holiday use to what would have been experienced with the established use as living units and it is not considered that there would be an impact on road safety. Should the application be acceptable, conditions could be imposed to ensure that a specific parking provision is earmarked to meet the requirements of TRA 2 of the LDP. However, the agent/applicant was not re-contacted to ask them to incur the costs of providing additional information, as resolving the parking issues identified by the Transportation Unit would not change the recommendation.

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

### **Flooding Matters**

7.15 Since submitting the application, the Welsh Government has published a revised TAN 15 on 31 March 2025. The revised TAN 15 is entitled 'Development, flooding and coastal erosion' and Circular 002/2025 'Guidance on The Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025', 'The Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025' and 'Main Plan (Wales) Direction 2025' have been published. The Government's Planning Directorate.

7.16 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."

However, the clarification letter states that "...the publication of new guidance could have an impact on the processing of planning applications therefore there will be a transitional period for the implementation of the TAN. Planning applications submitted and registered prior to the publication of the new TAN will continue to be assessed against the previous version...".

7.17 Therefore, official guidance from the Welsh Government for planning applications submitted and registered before 31 March 2025 states they are to be assessed for flood risk on the content of the 1st edition of the TAN 15 policy published in 2004. In the case of the application under consideration, it was submitted in December 2024 and is therefore assessed according to the requirements of TAN 15 (2004).

7.18 Compton House is shown within flood zone C2 in Flood Risk Maps and flood zones 3/2 (rivers) in Flood Maps for Planning, Welsh Government, Technical Advice Note (NCT) 15. The nature of the development in question, which is to change the use of the units to 5 holiday accommodation units (C6) would fall under the same definition as the established use of the units as main homes/residences (C3), which is a 'Development very vulnerable to harm'. Natural Resources Wales were consulted on the application, and it can be seen from their observations above that the site experienced flooding in 2012, but it is noted that flood alleviation measures on Afon Goch have since been carried out by Cyngor Gwynedd, which would have reduced the risk of flooding but not eliminated the risk. They elaborate in their observations that as the number of units (5) is not increased and in the absence of a Flood Consequence Assessment, they consider that the proposal could be acceptable subject to making the developer aware of the potential for flooding and for them to include flood-proofing measures in the ground floor unit and include examples of measures that could be incorporated. Based on favourable observations from Natural Resources Wales, the proposal is considered acceptable in terms of compliance with NCT 15 (2004) and policy PS 6 of the LDP.

### **Green Infrastructure Statement**

7.19 Paragraph 6.2.12 of Planning Policy Wales (Edition 12, 2024) states:

*"A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal."*

7.20 It is emphasised that the statement should be proportionate to the scale of the proposed development and should not be an onerous requirement. The purpose of the Green Infrastructure Statement will be to demonstrate the positive multi-functioned consequences of the proposal. In

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

undertaking the Statement, it should be ensured that the step-wise approach (paragraph 6.4.15, Planning Policy Wales (Edition 12, February 2024) is followed.

- 7.21 A Green Infrastructure Statement was received as part of the proposal. It states that the building/site has no biodiversity value and therefore no impact on biodiversity is anticipated and a step-wise approach has been demonstrated. From an inspection of the site, it is acknowledged that opportunities to undertake improvements are rare, as the rear of the site is covered with hard flooring. Given the nature of the development which involves change of use, with no external structural changes being proposed, no significant concern arises for biodiversity in this case. Some form of improvement could be proposed, such as the installation of bird/bat boxes to improve biodiversity on the site and a condition could be imposed to that effect to make it acceptable in terms of compliance with Planning Policy Wales (Edition 12, February 2024).

### **Welsh Language Matters**

- 7.22 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.
- 7.23 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. However, the policy states that some types of developments must consider the Welsh language. Later, a short Welsh Language Statement was submitted for the application, noting that the intention is to give the accommodation Welsh names. Within the units it will be planned to provide bilingual information about local attractions and facilities, and it is noted that the advertising and updates on social media would be bilingual. It is stated that they will consider the level of Welsh language skills if it is intended to appoint staff. The information received is relatively general but meets the requirements of PS1 of the LDP.
- 7.24 It is noted that an objector has expressed concern about the standard of the Language Statement and has expressed concern that the use of the units as holiday accommodation would be likely to cause harm to the Welsh language. The concerns are considered to be justified as the loss of 5 residential units, which would have been home to local people, from the housing stock to holiday use could make a difference and lead to a decline in the community and the Welsh language.

## **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 is contrary to the requirements of policy TWR 2 of the JLDP which presumes against loss of housing stock. The loss of 5 residential units from the stock would be harmful to the area and community and undermine the principles of the Article 4 Direction that has recently come into force in the Cyngor Gwynedd Planning Area. It is considered that the Business Plan is insufficient to prove the need for the proposal and there is no certainty that the development would be viable. There is doubt too that the site's parking provision is sufficient for its purpose. The agent was not approached for more information, as this would not influence our recommendation. Having carefully considered the application it is assessed that there is no choice but to refuse the application.

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

**9. Recommendation:**

To refuse – reasons

1. Allowing a change of use of 5 established residential units (C3) into 5 short -term holiday lets (C6) would result in a loss of permanent housing stock contrary to the requirements of criterion iii of policy TWR 2: Holiday accommodation of the Anglesey and Gwynedd Joint Local Development Plan and Supplementary Planning Guidance: Facilities and Accommodation for Tourists (2021).
2. There is insufficient information presented in the Business Plan to prove that there is a need for the (5) holiday units offered, with a lack of details/evidence regarding the current provision of holiday accommodation in the local market or clarification how the business would compete with other established enterprises. In the absence of an adequate Business Plan, an assessment cannot be made to determine if the proposal has a realistic prospect of being viable and is not speculative in nature. The proposal is therefore, contrary to the requirements of criterion v of policy TWR 2: Holiday Accommodation of the Anglesey and Gwynedd Joint Local Development Plan and the relevant requirements of the Supplementary Planning Guidance: Facilities and Accommodation for Tourists (2021).