

SNOWDONIA NATIONAL PARK AUTHORITY



CONSULTATION REPORT: SUPPLEMENTARY PLANNING GUIDANCE: 8) VISITOR ACCOMMODATION

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1 BACKGROUND

The Policy Context

- 1.1 The Authority adopted the Eryri Local Development Plan (ELDP) 2016-2031 on the 6th February 2019. The ELDP 2016-2031 contains Strategic Policies and Development Policies as a basis for deciding planning applications. Supplementary Planning Guidance documents (SPGs) provide further detailed information, in support of the ELDP policies.
- 1.2 SPGs will be a material planning consideration during the process of assessing and determining planning applications. Welsh Government and the Planning Inspectorate will place considerable weight on supplementary planning guidance that stem from, and are consistent with the ELDP. SPGs should expand and interpret planning policies and not in themselves, form new areas of policy.

The need for a Supplement Planning Guidance

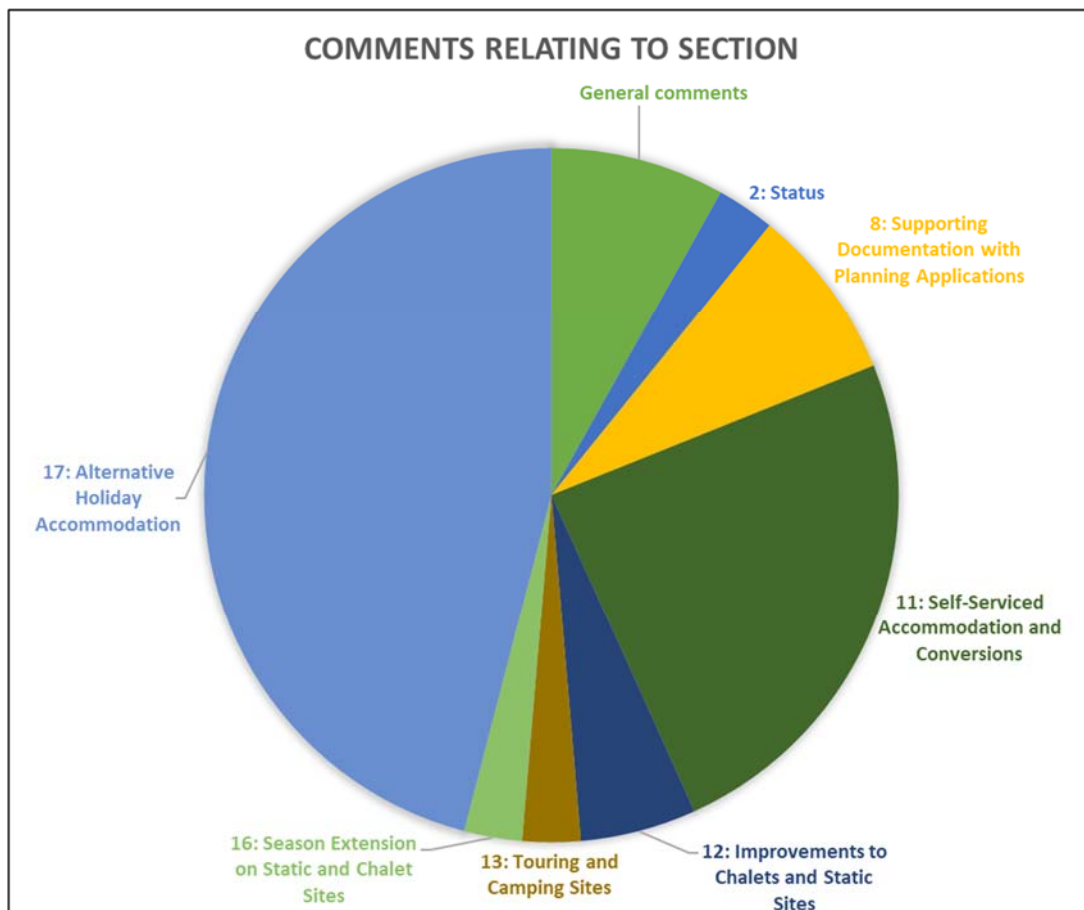
- 1.3 The main changes to the Visitor Accommodation policies following the short form revision of the ELDP, are the two new policies, Development Policy 28: New Build Serviced Accommodation, and Development Policy 29: Alternative Holiday Accommodation. The previous version of the Authority's SPG: Visitor Accommodation was adopted in October 2012. Since then, developments have occurred within the visitor accommodation sector, National Legislation and Guidance as well as the new policies presented in the ELDP. It is therefore necessary to revise the SPG as a whole to provide an up to date and appropriate guidance to assist those determining applications, Agents and Members of the Public on Visitor Accommodation developments within the Snowdonia National Park.
- 1.4 Specifically, the Visitor Accommodation SPG has been updated to include:
 - Detailed guidance to support policies in relation to Visitor Accommodation.
 - Further detailed guidance to users of the planning system on how the policies will be applied.
 - Greater guidance on what is meant by environmental and landscape improvements including biodiversity enhancements in particular on existing sites, and guidance regarding new developments.
 - An overview of various types of Visitor Accommodation such as New Build Serviced and Self-Serviced Accommodation, Conversions, Improvements to Chalet, Static Caravans, Touring and Camping Sites, as well as Alternative Holiday Accommodation.
 - Guidance to assist Officers and Members in determining planning applications for Visitor Accommodation developments, and provide an understanding of the objectives regarding this type of development within the National Park for the public.
- 1.5 Essentially, within this SPG, there are two parts. Sections 1-8 encompass guidance relating to all developments regarding Visitor Accommodation, such as the following;
 - National guidance,

- Background evidence and guidance regarding Tourism and the National Park working towards a Sustainable and Eco approach,
- the Landscape Considerations with every development proposal,
- the Welsh Language Considerations, and;
- the possible documentation required whilst submitting a development proposal.

The second part, (sections 9-17) gives specific guidance relating to the various types of visitor accommodation developments and elaborates the objectives of the ELDP policies to ensure appropriate developments within a National Park context. The Authority recognises that these various types of accommodation have an important role in the accommodation provision and economy within the National Park; therefore, this guidance aims to elaborate on the policies within the ELDP to ensure that any future developments respect the protected landscape and special qualities of the Snowdonia National Park.

2 PUBLIC CONSULTATION

- 2.1 A draft version of this SPG was approved for public consultation by the Authority's Planning and Access Committee on May 22nd 2019. The draft was prepared in consultation with officers from the Authority's Development Management Section and Conservation, Woodlands and Agriculture Section, along with other expert Topic Stakeholders.
- 2.2 The approved draft of this SPG was the subject of a 6 week public consultation between the 29th May 2019, and the 11th July 2019.
- 2.3 Details of the public consultation were available on the Authority's website, and emails/letters were sent to all Councillors, Community Councils, and those on the Authority's Contact Database. Hard copies of the SPG were also available to view:
- at the National Park Office in Penrhyndeudraeth,
 - at public libraries in Barmouth, Bethesda, Blaenau Ffestiniog, Dolgellau, Penygroes, Tywyn, Porthmadog, Y Bala, Cerrigydrudion, Conwy, Llanfairfechan, Llanrwst, Penmaenmawr, and
 - at the Authority's Information Centres in Betws Y Coed, Beddgelert and Aberdyfi.
- 2.4 Interested parties were informed to respond to the consultation through submitting comments by emailing polisi.cynllunio@eryri.llyw.cymru or by post to the Authority's Park Office address in Penrhyndeudraeth.
- 2.5 A total of 37 comments were received, 4 in support and 33 objecting.



2.6 Appendix 1 of this report, summarises the comments received, the Authority's response to the comments and, where appropriate, recommends any changes required to the SPG in lieu of the comment.

APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND OFFICERS' RECOMMENDATIONS

| Resp ID | Rep ID | Organisation | Type of comment | Chapter | Para no. | Officer Summary | Officer Response | Changes Proposed |
|---------|--------|--|-----------------|---------|----------|--|--|----------------------|
| 003 | 001 | CLA | Support | General | General | Snowdonia is increasingly seen as a destination for adventure sports due to its location, spectacular features, scenery and wildness. We recognise this will inevitably conflict with the National Park and its special status. However in order to be able to maintain these special features, a viable local rural economy has to be allowed to flourish in order to manage this landscape, especially in times where public funding is in decline. Many of the proposals set out in the draft SPG 8 make sense and in general terms the Authority have got the policy just about right. This applies to sections 5,6,7,9,10,12,13,14,15,16. | Noted. | No changes proposed. |
| 004 | 001 | Betsi Cadwaladr University Health Board - Planning | Objection | General | General | Due to the large increase in the number of visitors, especially during the summer months that could cause increased pressure on health care resources, it is suggested to include a 'Local Health Impact Assessment' in the planning process which will consider new build applications, conversions to serviced accommodation and camp site expansions. | Through the review and examination process of the recently adopted LDP 2016-2031, a Health Impact Assessment (HIA) was conducted and a screening report published (2017 & 2018) which ensured that health and well-being issues were taken into account throughout the plan process. The HIA was an iterative process to help ensure that the Revised LDP has a positive impact on health. Each policy was screened individually as part of the assessment, with no significant negative implications identified. As is stated within para 2.5 of the LDP 2016-2031, Legislation and National Planning Policy | No changes proposed. |

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| | | | | | | | <p>are quite clear that major development should not take place in National Parks other than in exceptional circumstances which is assessed through Strategic Policy B: Major Development. Where the Authority considers that the overall outcome of this assessment will result in an adverse and unacceptable impact on the National Park, permission for such major development will be refused.</p> <p>Furthermore every development proposal is considered against Strategic Policy A: National Park Purposes and Sustainable Development, with the specific criterion (iii) that the safeguarding and improvement of the health, safety, economic and social well-being of local communities is a consideration that should be taken into account to help deliver sustainable development in Snowdonia.</p> <p>Regarding Visitor Accommodation development, new sites may only be permitted under Development Policy 9: Conversion and Change of Use of Rural Buildings, Development Policy 28: New Build Serviced Accommodation, and Development Policy 29: Alternative Holiday Accommodation. The general requirements of these policies are for these developments to be of a small scale, or of a scale and design that is compatible with its setting. As a result, it may be considered inappropriate for a HIA or Local HIA to be mandatory with every holiday accommodation planning application.</p> | |
| 005 | 001 | Conwy County Borough | Support | General | General | Agrees with the approach of the SPG of ensuring a balance between safeguarding the local | Noted. | No changes proposed. |

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| | | Council – Rural Development Strategy | | | | community and the environment as well as promoting visitor accommodation development. | | |
| 006 | 001 | Snowdonia Society | Objection | General | General | Queries the use of yellow boxes within the SPG. | The use of yellow boxes is to highlight certain information regarding particular sections of the SPG. | No changes proposed. |
| 006 | 002 | Snowdonia Society | Objection | 2 | 2.3 | Debates the need for para 2.3 to be included within the SPG, regarding large visitor accommodation proposals being assessed as major developments. Given other examples where the question of development on a 'large scale' has been raised and then disregarded (e.g. Llanbedr access road) it is difficult to imagine the development of tourist accommodation of a size or significance 'more national than local in character', when 'national' mean the United Kingdom rather than Wales. | This paragraph has been included for clarification purposes should the Authority receive a development proposal of a large scale. | No changes proposed. |
| 002 | 001 | Natural Resources Wales | Support | 8 | General | NRW have proposed additional guidance within section 8 to assist and explain the range of landscape issues planning proposals for visitor development should consider in order to achieve a good level of landscape integration and a high quality of visitor experience. | The additional guidance suggested by NRW is considered appropriate in assisting and providing information to developers of the range of landscape considerations that could be relevant to their development proposal, and inform of any supporting documentation that may be required. This is to be included with minor amendments as an appendix to the SPG. | Proposed appendix titled: 'The Landscape Issues for Visitor Accommodation proposals to consider' to be referenced in Section, drafted below; <i>'8.1 Guidance within appendix 1 informs of the general range of landscape issues relating to Visitor Accommodation that Planning Officers need to consider when assessing development proposals in order to ensure and safeguard the conservation and enhancement of the National Park's 'Special Qualities'. The following guidance regarding supporting documentation with planning applications, informs of the possible</i> |

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| | | | | | | | | <i>information Planning Officers may request in order to conduct an appropriate assessment to reach an informed decision regarding each development proposal.'</i> |
| 003 | 002 | CLA | Objection | 8 | General | Argues that Section 8 of the SPG could be further simplified and clarified in order to not deter potential developers from pursuing an agricultural diversification scheme with visitor accommodation. | The supporting documentation listed in Section 8 covers all types of visitor accommodation and will therefore not be relevant for every development proposal. Where deemed necessary, this additional information is essential in order to undertake an appropriate assessment of the development proposal to ensure the conservation and enhancement of the 'Special Qualities' of the National Park. | Propose to amend the following sentences within the two textboxes in Section 8 for clarification purposes; <i>'In order to assist the determination of applications, Planning Officers can request additional information where appropriate, such as;'</i> <i>'When submitting a planning application, the Authority will expect developers to provide sufficient evidence to support the application. Where Planning Officers deem it appropriate, this evidence could include the following;'</i> This evidence should include the following where appropriate.' |
| 008 | 001 | Baileys and Partners | Objection | 8 | General | Supportive of this policy, but the technical detail of the guidance makes the policy difficult and very restrictive. To support the farms in Eryri, any planning policy or guidance must support diversification, and not be a barrier to diversification. The list of supporting documentation in Section 8 and the processes that must be followed will discourage a significant number of farms from diversifying, and only those with significant investment and resources/ support available will | The supporting documentation listed in Section 8 covers all types of visitor accommodation and will therefore not be relevant for every development proposal. Where deemed necessary, this additional information is essential in order to undertake an appropriate assessment of the development proposal to ensure the conservation and enhancement of the 'Special Qualities' of the National Park. However, in order to clarify this, amendments and additions are proposed within section 8 of the SPG. | Propose to include the following para in section 8 of the SPG for clarification purposes; <i>'8.1 Guidance within appendix 1 informs of the general range of landscape issues relating to Visitor Accommodation that Planning Officers need to consider when assessing development proposals in order to ensure and safeguard the conservation and enhancement of the National Park's 'Special Qualities'. The following guidance regarding supporting documentation with planning applications, informs of the possible information Planning Officers may request in order to conduct an appropriate assessment to reach an</i> |

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| | | | | | | consider diversifying into holiday accommodation within Eryri. | | <p><i>informed decision regarding each development proposal.'</i></p> <p>Propose to amend the following sentences within the two textboxes in Section 8 for clarification purposes;</p> <p><i>'In order to assist the determination of applications, Planning Officers can request additional information where appropriate, such as;'</i></p> <p><i>'When submitting a planning application, the Authority will expect developers to provide sufficient evidence to support the application. Where Planning Officers deem it appropriate, this evidence could include the following; This evidence should include the following where appropriate:'</i></p> |
| 001 | 001 | Dioni | Objection | 11 | 11.1 | Disagrees with the statement made in para 11.1 regarding the over provision of self-catering accommodation within the National Park. Argues of the shortage of good quality self-catering accommodation in the National Park. | <p>The objective adopted within the LDP and sections 11-16 of this SPG is to improve the quality of existing non-serviced accommodation. It could be considered appropriate to amend para 11.3 of the SPG in order to clarify this.</p> <p>The statement made in para 11.1 of the SPG regarding the over provision of self-catering accommodation within the National Parks includes chalets and caravans as well as self-catering holiday houses, cottages and flats. During the Short Form Examination process of the Eryri Local Development Plan (LDP) 2016-2031, evidence was gathered and reported in Background Paper 16: Tourism (May 2017) of the declining number of serviced accommodation in the past decade from 6,066 to 3,723 bedstock, and of the increasing number of non-serviced accommodation to be</p> | <p>To include in para 11.3 of the SPG the following;</p> <p>'Development Policy 9: Conversion and Change of Use of Rural Buildings within the Visitor Accommodation context supports the conversion of rural buildings for use as short term (not exceeding 28 consecutive days per occupant) as good quality self-catering properties as part of an existing rural enterprise scheme to benefit the local economy of the National Park'.</p> |

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| | | | | | | | estimated at 48,671 bedstock. This understanding has therefore been adopted within the approach to Tourist Accommodation within the LDP, and has been expanded upon within this SPG, and the adopted SPG 13: Landscape Sensitivity and Capacity Assessment evaluating the effect of Static Caravan and Chalet Parks within the National Park. | |
| 008 | 002 | Baileys and Partners | Objection | 11 | 11.1 | Disagrees with the suggestion that there is an over provision of self-catering holiday accommodation within Eryri. The demand for high quality self-catering accommodation outstrips the availability of such accommodation. | <p>The objective adopted within the LDP and sections 11-16 of this SPG is to improve the quality of existing non-serviced accommodation. Minor amendments are considered appropriate within para 11.3.</p> <p>The statement made in para 11.1 of the SPG regarding the over provision of self-catering accommodation within the National Parks includes chalets and caravans as well as self-catering holiday houses, cottages and flats. During the Short Form Examination process of the Eryri Local Development Plan (LDP) 2016-2031, evidence was gathered and reported in Background Paper 16: Tourism (May 2017) of the declining number of serviced accommodation in the past decade from 6,066 to 3,723 bedstock, and of the increasing number of non-serviced accommodation to be estimated at 48,671 bedstock. This understanding has therefore been adopted within the approach to Tourist Accommodation within the LDP, and has been expanded upon within this SPG, and the adopted SPG 13: Landscape Sensitivity and Capacity Assessment evaluating the effect of Static Caravan and Chalet Parks within the National Park.</p> | <p>To include in para 11.3 of the SPG the following;</p> <p><i>'Development Policy 9: Conversion and Change of Use of Rural Buildings within the Visitor Accommodation context supports the conversion of rural buildings for use as short term (not exceeding 28 consecutive days per occupant) as good quality self-catering properties as part of an existing rural enterprise scheme to benefit the local economy of the National Park'.</i></p> |

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| 008 | 003 | Baileys and Partners | Objection | 11 | 11.1 | Disagrees with the statement made in para 11.1 that visitors staying in self-catering accommodation do not make such a contribution to the local economy, as the developments provide employment. | <p>The statement made in para 11.1 of the SPG regarding that visitors staying in self-catering accommodation do not make such a contribution to the local economy is relative to the contribution made by serviced accommodation in relation to expenditure within the local economy and not in reference to employment. The statement reads;</p> <p><i>'Visitors staying in these types of accommodation [self-serviced accommodation such as caravans, chalets, and self-catering holiday houses] do not make such a contribution to the local economy as they often bring provisions with them from their own homes. Many of the larger caravan parks offer a range of facilities on site thus reducing the need to spend in the wider surrounding economy.'</i></p> <p>According to the STEAM 2014 data published within Background Paper 16: Tourism (2017), with 32,632 visitors residing in serviced accommodation producing a revenue of £50.69m, and 103,000 visitors residing in non-serviced accommodation producing a revenue of £287.92m; the average contribution <u>per person</u> is 82% higher by visitors residing in serviced accommodation. STEAM data recorded for 2017, also reports of the same trend. Therefore analytical data does support the statement made in para 11.1 of the SPG in terms of expenditure within the wider surrounding economy.</p> | No changes proposed. |
| 005 | 002 | Conwy County Borough Council – Rural | Objection | 11 | 11.2 | Supports the principle of subjecting developments of Self-Serviced Accommodation and Conversions to a condition that requires a register of occupants staying at the property to ensure | The condition is one of the Authority's standard conditions placed upon Visitor Accommodation developments that has been implemented by the Authority, and considered by a Planning Inspectorate. | No changes proposed. |

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| | | Development Strategy | | | | that the developments are for short term holiday use only and shall not be used as a second home or main residence of the occupiers. However, does foresee that this condition will be difficult to monitor. | | |
| 008 | 004 | Baileys and Partners | Objection | 11 | 11.2 | Concerned with the General Data Protection Regulations regarding the condition that self-serviced accommodation owners should keep an up to date register of the information of all occupiers in order to ensure the short term holiday use of these developments. | Article 6.1(c) Lawfulness of Processing states that processing is necessary for compliance with a legal obligation to which the controller is subject. For legal reasons, the register is necessary in terms of compliance of the development against its permission. The private information contained on the register although inspected by the Authority, will not be stored by the Authority, or supplied to any other organisation. The use of a register for a holiday occupation condition is widely used by Local Planning Authorities and is supported by guidance contained within Welsh Office Circular: The Use of Conditions for Development Management. | No changes proposed. |
| 003 | 003 | CLA | Objection | 11 | 11.3 | Disagrees that a conversion of a rural building to holiday accommodation as part of an agricultural diversification scheme, that the visitor accommodation should be secondary to the agricultural business. | The Authority considers the reuse of these buildings should be for the benefit of the residents and the local economy of the National Park. Conversions for holiday accommodation on farms can contribute to the local rural economy. Permitting conversions that are not ancillary/secondary to the agricultural business will contribute less to the local rural economy and may have adverse impacts on the vitality of nearby settlements. The intention of this policy is not for the holiday accommodation to become the main source of income, but to support an existing rural enterprise. | No changes proposed |

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| 007 | 001 | Cadnant Planning | Objection | 11 | 11.3 | <p>Flexibility should be applied when considering conversion schemes for holiday units so as to allow these to be connected to an existing or proposed tourist attractions, in addition to farm diversifications.</p> | <p>The adopted approach within the LDP 2016-2031 in regard to the conversion and change of use of rural buildings outside a housing development boundary, for self-catering holiday units is only merited as part of a rural enterprise scheme. Para 11.3 of the SPG gives further guidance stating that the definition of a rural enterprise scheme is contained in Technical Advice Note (TAN) 6, i.e.</p> <p>Para 4.3.2: <i>'For the purpose of this technical advice note qualifying rural enterprises comprise land related businesses including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting), tourism and leisure enterprises.'</i></p> <p>Therefore provided a development proposal conforms to the policies of the LDP 2016-2031, it is possible for a conversion of a rural building to holiday accommodation to be a part of a tourism enterprise considered as a rural enterprise scheme in TAN 6. Additional information within para 11.3 of the SPG could be considered appropriate for clarification purposes, as well as dividing para 11.3 into three paragraphs for clarity.</p> | <p>For clarification purposes, propose to include the following in para 11.3, and divide the paragraph accordingly;</p> <p>'11.3 Development Policy 9: Conversion and Change of Use of Rural Buildings within the Visitor Accommodation context supports the conversion of rural buildings for use as short term (not exceeding 28 consecutive days per occupant) as good quality self-catering properties as part of an existing rural enterprise scheme to benefit the local economy of the National Park. The definition of a rural enterprise scheme is contained in Technical Advice Note 6.</p> <p>11.4 If the conversion is part of an agricultural diversification scheme the Authority would require evidence that the proposal is secondary to the use of the livestock or crop production and the proposal takes place on a holding which is registered as an existing agricultural business. Farm plans would also be useful to support an application to demonstrate how the short term self-serviced holiday accommodation fits into the wider farming picture. Providing information to demonstrate the validity of the agricultural business and to demonstrate how the self-catering accommodation will contribute to the overall farming context of the business, it is essential to ensure that the planning application conforms to the requirements of Development Policy 20: Agricultural Diversification, and will avoid further queries and delays further down the line.</p> |

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| | | | | | | | | <p><i>11.5 Other existing rural enterprise schemes that are in line with the definition in TAN 6 should provide evidence that the existing rural enterprise scheme is an established enterprise along with a business plan for the enterprise to demonstrate how the short term self-serviced holiday accommodation fits in with the wider rural enterprise scheme. The Authority will consider the expediency of tying the visitor accommodation to the existing rural enterprise to discourage its fragmentation by the converted building being sold separately. use a Planning obligation to tie the converted building to the land, so as to discourage the subsequent fragmentation of the enterprise scheme by separate sale of the building and to prevent them being sold separately without further application to the authority.</i></p> |
| 008 | 005 | Baileys and Partners | Objection | 11 | 11.3 | <p>Paragraph 11.3 states that conversion must be ancillary to agriculture. Clarification is needed on how the Park Authority would assess whether the new visitor accommodation is ancillary to the farming enterprise? Would the assessment be financial or would it be based on time input into the different enterprises? Clarification is also required whether or not this guidance prohibits a second conversion in the event that the first diversification/conversion proved successful.</p> | <p>Para 6.49 of the adopted LDP 2016-2031 states, that the evidence provided to support any proposal which is part of an agricultural diversification scheme, is required to conform to the requirements set out in Technical Advice Note (TAN) 6 and Development Policy 20: Agricultural Diversification of the LDP. As adopted within para 6.30 of the LDP regarding agricultural diversification developments,</p> <p><i>'Broadening the economic base of farming activities is recognised as a means of improving the viability of the farm economy of the area. The Authority therefore supports those diversification proposals which complement and supplement, rather than replace, livestock farming as the principal long-term farming activity on a holding. It is important that any agricultural diversification</i></p> | <p>For clarification purposes, propose to include the following as a footnote defining 'secondary' in para 11.4;</p> <p>Footnote:</p> <p><i>'A 'secondary' use in this context, should be subservient to the main original use in terms of scale and activity, and make an economic contribution to assist in the long term viability of the farm holding as an agricultural enterprise.'</i></p> |

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| | | | | | | | <p><i>scheme takes place on a genuine working farm registered as an agricultural holding and accords with the definition of 'Agriculture' as defined in Section 336 of the Town and Country Planning Act 1990.'</i></p> <p>Criteria (ii) and (iii) of Development Policy 20 therefore requires for an agricultural diversification proposal to demonstrate that the proposal is secondary to the use of the remaining land on the holding for livestock or crop production, and that the scheme takes place on a holding which is registered as an existing agricultural business. The proposed para 11.4 and the textbox in section 17 (p.28) highlights the usefulness of a farm plan, as outlined in TAN 6 (para 3.10), in supporting an application through demonstrating how the short-term self-serviced holiday accommodation fits into the wider farming picture. A 'secondary' use in this context, should be subservient to the main original use in terms of scale and activity, and make an economic contribution to assist in the long term viability of the farm holding as an agricultural enterprise.</p> <p>The proposed para 11.5 also states the same requirement for other existing rural enterprise schemes with development proposals for the conversion and change of use of rural buildings to a self-serviced holiday accommodation to be submitted with a business plan for the enterprise to demonstrate how the short term self-serviced holiday accommodation fits in with the wider rural enterprise scheme.</p> <p>The above guidance and criteria has been adopted within the LDP 2016-2031 and expanded upon within the SPG to ensure that</p> | |

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| | | | | | | | rural enterprise schemes and agricultural diversification proposals complement and supplement the rural economy. Each relevant development proposal will therefore be assessed against this guidance and criteria. | |
| 007 | 006 | Cadnant Planning | Objection | 11 + 17 | General | Urges the Authority to reconsider the guidance provided in the SPG to allow flexibility for serviced accommodation to develop an alternative holiday accommodation units, with the ancillary facilities within the existing serviced accommodation unit i.e. hotel, guest houses and hostel buildings. Applications would need to demonstrate that the proposal would still provide serviced accommodation and could be linked to improving the overall quality of serviced accommodation. | The adopted Development Policy 29: Alternative Holiday Accommodation within the LDP 2016-2031, specifies that sites which are not linked to an agricultural diversification scheme or is ancillary to a new or existing visitor tourist attraction will not be permitted. The objective of Development Policy 29 is to encourage small scale development in order to enhance and promote the viability of the rural economy within the Snowdonia National Park. Due to the potential detrimental visual impact development can have on the sensitive landscape and 'Special Qualities' of the National Park, alternative holiday accommodation development has been limited to an agricultural diversification scheme and tourist attraction to avoid the proliferation of this type of development. The guidance within the SPG therefore must be consistent with the criteria adopted in the LDP 2016-2031 and should not form new areas of policy. | No changes proposed. |
| 008 | 006 | Baileys and Partners | Objection | 12 | 12.1 | TAN 13 (Tourism) states that local authorities may consider dividing large static caravan and chalet sites into smaller units to reduce overall environmental impact, however this could have | Technical Advice Notes (TANs) provide detailed planning advice that Local Planning Authorities take into account when they are preparing development plans. Technical Advice Note (TAN) 13: Tourism guidance cited within the SPG is to inform of the approach | No changes proposed. |

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| | | | | | | the opposite effect and would increase the overall environmental impact. | towards development proposals for improvements to existing chalet and static caravan sites to ensure environmental improvements. Should a development proposal demonstrate an increase in the overall environmental impact, it would be contrary to Development Policy 22: Chalet and Static Caravan Sites, contrary to the LDP 2016-2031 as a whole as well as National Policy, and would therefore not receive planning permission. | |
| 002 | 002 | Natural Resources Wales | Objection | 12 | Text Box (p.23) | Propose to amend sentence for clarification regarding landscape and environmental improvements to existing chalet and static caravan sites. Last sentence – ‘They also have little or no internal landscaping in order to break up their visual monotony the denseness and regularity of development within the landscape site ’. | Agree to amend for clarification purposes. | For clarification purposes it is proposed to amend the following within the textbox on page 23. <i>‘They also have little or no internal landscaping in order to break up the denseness and regularity of development the visual monotony within the site landscape’.</i> |
| 005 | 003 | Conwy County Borough Council – Rural Development Strategy | Objection | 13 | 13.1 | Supports the principle of the need to regulate Touring and Camping Sites, however disagrees to an extent with the ‘blanket ban’ on supporting any new provision. | Development Policy 23: Touring and Camping Sites (DP23) is based on evidence published within Background Paper 16: Tourism, and SPG 13: Landscape Sensitivity and Capacity Assessment, that there is sufficient provision of these sites within the Snowdonia National Park. Due to their visual impact on the landscape, the Policy does not permit new touring or camping sites, however the extension, or upgrading of existing touring caravan and camping sites, will be permitted providing the criteria in DP23 is satisfied. The | No changes proposed directly in relation to this comment. However for the purposes of clarity, the definition below has been included in para 13.1. <i>‘Touring and camping sites may be defined as the use of land (for pitches) where visitors bring their own temporary holiday accommodation in the form of tents or touring caravans/campervans.’</i> |

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| | | | | | | | newly adopted Development Policy 29: Alternative Holiday Accommodation does permit new sites for the new type of offering of visitor accommodation providing its criteria is satisfied. | |
| 007 | 002 | Cadnant Planning | Objection | 16 | 16.2 | The wording of the condition suggested to be used in paragraph 16.2 is contrary to the advice given in WG Circular 'The Use of Planning Conditions for Development Management' (2014) regarding seasonal/holiday occupancy. There is no justification provided to support the view that a seasonal occupancy condition is more appropriate than a holiday occupancy condition. This needs to be addressed. If the Authority cannot justify a seasonal condition, this should be amended to be a holiday occupancy condition which we consider to be the most appropriate condition as per the Welsh Government Circular. | Paragraph 16.2 of the SPG is not a seasonal condition. A seasonal condition will expressly limit occupation during a certain time of the year. The condition proposed in 16.2 would be imposed on an approval for an extension of a season. A separate condition would specify the length of a season. The condition proposed is similar to the holiday occupancy condition provided in para. 91 of WG Circular 'The Use of Planning Conditions for Development Management' (2014). It differs by limiting occupation periods to 28 days, which is considered more appropriate for a chalet sites to ensure they remain in holiday use only. | For consistency purposes, it is considered appropriate to amend para 16.1 to include the following regarding static caravan sites, in order to be compatible with chalet development; <i>16.1: Applications permitted for extending the season Permitted applications regarding seasons extensions on Static Caravan Sites will be subject to the following condition;</i> <i>'The caravans shall be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence. No person shall occupy the holiday accommodation hereby permitted for a continuous period of more than 28 days in any calendar year. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.'</i> |
| 008 | 014 | Baileys and Partners | Objection | 17 | General | The Peak District National Park allows exceptions to be made and appears to give officers the means by which discretion can | The Local Development Plan (LDP) 2016-2031 has been formulated and examined by an Independent Planning Inspector to ensure that it defines the scope for future development in | For clarification purposes it is also proposed to amend para 17.4 as following; |

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| | | | | | | <p>be applied. The Core Strategy for Peak District National Park recognises the need for farm incomes to be supported and the needs for pod operators (i.e. farmers) to improve quality in order to remain competitive. Argues the Authority should adopt a similar approach.</p> | <p>the area, based upon local evidence, monitoring and National Guidance, to reflect the National Park Authorities' statutory responsibilities. The approach to Alternative Holiday Accommodation developments has therefore been specifically formulated to ensure successful and appropriate development within the Snowdonia National Park area, and to avoid the proliferation of these developments.</p> <p>Alternative Holiday Accommodation developments within the National Park are considered as a new and different type of offering, and therefore it is encouraged to explore innovative sustainable visitor accommodation that respects the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Amendments to para 17.4 of the SPG are proposed to clarify this. Para 17.17 of the SPG gives guidance on where to seek further advice by the Welsh Government on how to ensure a high quality standard of sustainable accommodation that might be considered acceptable within the Snowdonia National Park, as each development is assessed on its own merit. The Authority and the guidance by the Welsh Government considers 'Quality' regarding alternative holiday accommodation to be measured in terms of the uniqueness of the experience creating a memorable visit, not necessarily in terms of the 'luxury' facilities. Amendments are proposed to para 17.17 for clarification.</p> <p>The Authority therefore, within the SPG, encourages innovative and high quality</p> | <p><i>'17.4 As Alternative Holiday Accommodation developments within the National Park are considered as a 'new' and different type of offering, it is encouraged to explore innovative sustainable visitor accommodation that preserves and enhances the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Proposals that are based on the principles of sustainable tourism as identified in section 5, which promote opportunities for the understanding, and enjoyment of the Special Qualities of the National Park will be supported.'</i></p> <p>For clarification purposes it is proposed to include in para 17.17, the following;</p> <p><i>"This does necessarily mean that the quality will be of a lower standard; the 'quality' of alternative holiday accommodation can be measured in terms of the uniqueness of the experience in creating a memorable visit and not only in terms of 'luxury' facilities; see link below for Welsh Government's brochure on 'Glamping Quality Standard' for qualities of high standard sustainable glamping that may be considered as an acceptable development within the National Park."</i></p> |

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| | | | | | | | Alternative Holiday Accommodation developments. However due to the potential detrimental visual impact development can have on the sensitive landscape and 'Special Qualities' of the National Park, the primary consideration when assessing the development proposals is the impact of the landscape and landscape character. Each development proposal is considered on its own merit, and where deemed necessary by a Planning Officer, in order to undertake an appropriate assessment to deliver an appropriate development additional information and evidence is required, as stated in section 8 of the SPG. | |
| 008 | 008 | Baileys and Partners | Objection | 17 | 17.3 | Agree that each proposal must be considered on their own merits, however is concerned with the reference 'back to nature experience' limiting developments. | Due to the nature of these developments and the criteria of the policy adopted within the LDP 2016-2031, alternative holiday accommodation are types of low impact accommodation that are generally less intrusive in the landscape than the more traditional static and touring caravan. Alternative Holiday Accommodation developments within the National Park are considered as a new and different type of offering, and therefore it is encouraged to explore innovative sustainable visitor accommodation that respects the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Amendments to para 17.4 are proposed to clarify this. The Authority and the guidance by the Welsh Government considers 'Quality' regarding alternative holiday accommodation to be measured in terms of the uniqueness of the experience creating a memorable visit, not necessarily in terms of the | For clarification purposes it is proposed to include in para 17.4, the following; <i>'17.4 As Alternative Holiday Accommodation developments within the National Park are considered as a 'new' and different type of offering, it is encouraged to explore innovative sustainable visitor accommodation that preserves and enhances the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Proposals that are based on the principles of sustainable tourism as identified in section 5, which promote opportunities for the understanding, and enjoyment of the Special Qualities of the National Park will be supported.'</i> For clarification purposes it is proposed |

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| | | | | | | | 'luxury' facilities. Amendments are proposed to para 17.17 to clarify this. | to include in para 17.17, the following; <i>"This does necessarily mean that the quality will be of a lower standard; the 'quality' of alternative holiday accommodation can be measured in terms of the uniqueness of the experience in creating a memorable visit and not only in terms of 'luxury' facilities; see link below for Welsh Government's brochure on 'Glamping Quality Standard' for qualities of high standard sustainable glamping that may be considered as an acceptable development within the National Park."</i> |
| 005 | 004 | Conwy County Borough Council – Rural Development Strategy | Objection | 17 | 17.3-5 | Agrees with the approach towards Alternative Holiday Accommodation development, and argues of a 'sympathetic view' towards this development within the National Park. However, disagrees that this particular development should be confined to agricultural diversification projects or ancillary to new or existing tourist attractions. This development should also support other emerging Small and Medium-sized Enterprises (SMEs). | The objective of Development Policy 29 is to encourage small scale development in order to enhance and promote the viability of the rural economy within the Snowdonia National Park. However, due to the potential detrimental visual impact development can have on the landscape and 'Special Qualities' of the National Park, development control is an integral part of this policy in order to achieve the purposes of the Snowdonia National Park Authority. During the formation of this policy the definition of SMEs was considered to be relatively broad thus resulting in the possible proliferation of this type development. | No changes proposed. |
| 009 | 001 | Youth Hostel Association | Objection | 17 | 17.6 | Considers that the definition of a tourist attraction should also include reference to "education and learning" e.g. learning outside of the classroom. There will be instances when tourist accommodation also draws people to a specific area to visit | The objective of the adopted Development Policy 29: Alternative Holiday Accommodation within the LDP 2016-2031, is to encourage small scale development in order to enhance and promote the viability of the rural economy within the Snowdonia National Park provided there is minimal detrimental impact on the landscape and landscape character. Due to | For clarification purposes, minor amendments are proposed to para 17.6 as following; <i>17.6 A 'tourist attraction' is defined as a place of cultural significance and interest that offers leisure, adventure, culture, and or amusement, drawing people to visit</i> |

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| | | | | | | and experience the surrounding landscape and the tourism offer available in those areas. An example would be the YHA, which has seven sites in SNPA and provides much more than just simply accommodation. We promote, deliver and sell these activities/products which draws people to the National Park – an attraction. In it's current form, the guidance set out in the SPG does not provide any flexibility for such enterprises to be considered under Development Policy 29, although they do perform functions that tourist attractions as well as providing accommodation. | <p>the potential detrimental visual impact development can have on the sensitive landscape and 'Special Qualities' of the National Park, alternative holiday accommodation development has been limited to an agricultural diversification scheme and tourist attraction to avoid the proliferation of this type of development. The guidance within the SPG therefore must be consistent with the criteria adopted in the LDP 2016-2031 and should not form new areas of policy.</p> <p>For clarification, para 17.6 of the SPG defines 'tourist attraction', as a place of cultural significance and interest that offers leisure, adventure and amusement, drawing people to visit and experience the particular offering. Para 17.6 also specifies that 'tourist accommodation' are considered as 'facilities' rather than an 'attraction'. Whilst the Authority is in agreement that tourist accommodation are not considered an attraction, minor amendments may be required in order to further define what the Authority considers as a 'tourist attraction' that is consistent with the requirements of the policy and objectives of the LDP 2016-2031 .</p> | <i>and experience the particular offering within the site itself. The attraction should stand on its own merit, and not be reliant on ancillary enterprises such as cafes, or the proposed alternative holiday accommodation development in order to conform to criteria adopted within para 6.50 of the LDP 2016-2031. Tourist accommodation are considered as 'facilities' rather than an 'attraction'.</i> |
| 008 | 007 | Baileys and Partners | Objection | 17 | Text Box (p.28) | Clarification is needed on what constitutes a secondary activity to agriculture is required. | <p>Para 6.49 of the adopted LDP 2016-2031 requires that evidence is provided to support any proposal which is part of an agricultural diversification scheme that conforms to the requirements set out in Technical Advice Note (TAN) 6 and Development Policy 20: Agricultural Diversification.</p> <p>Adopted within para 6.30 of the LDP regarding agricultural diversification developments,</p> <p><i>'Broadening the economic base of farming activities is recognised as a means of</i></p> | <p>For clarification purposes, propose to include the following as a footnote defining 'secondary' in para 11.4;</p> <p>Footnote:</p> <p><i>'A 'secondary' use in this context, should be subservient to the main original use in terms of scale and activity, and make an economic contribution to assist in the long term viability of the farm holding as an agricultural enterprise.'</i></p> |

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| | | | | | | | <p><i>improving the viability of the farm economy of the area. The Authority therefore supports those diversification proposals which complement and supplement, rather than replace, livestock farming as the principal long-term farming activity on a holding. It is important that any agricultural diversification scheme takes place on a genuine working farm registered as an agricultural holding and accords with the definition of 'Agriculture' as defined in Section 336 of the Town and Country Planning Act 1990.'</i></p> <p>Criteria (ii) of Development Policy 20 therefore requires for an agricultural diversification proposal to demonstrate that the proposal is secondary to the use of the remaining land on the holding for livestock or crop production, rather than replace livestock farming as the principal long-term farming activity on a holding. The textbox in section 17 (p.28) therefore expands upon this requirement for this evidence to be submitted in the form of a farm plan. Further clarification could be considered appropriate for clarity.</p> | <p>Furthermore, propose to include the following within the textbox (p.28) for guidance.</p> <p><i>'The Authority will require evidence that the proposal is part of an agricultural diversification scheme which takes place on a holding which is registered as an existing agricultural business. A Farm Plan would also usefully support applications to provide more information on the viability of farms and the case for diversification. (See para 11.4 of this SPG for further guidance). Proposals will need to conform to the requirements set out in TAN 6: Planning for Sustainable Rural Communities and Development Policy 20: Agricultural Diversification-criterion (i – iv). The Authority believes that the holder of the agricultural unit should benefit from the diversification. The Authority will not look favourably on applications which may lead to the fragmentation of the agricultural unit.'</i></p> |

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| 008 | 009 | Baileys and Partners | Objection | 17 | 17.12 | Clarification is required whether the accommodation unit must be capable of being both dismantled and moved or either of those options. Not all alternative holiday accommodation units can be dismantled despite being mobile in nature and the risk on insisting that they are is to reduce their working lives such that again it forces a business plan for the same to fail. We consider that the requirement simply to be moved is sufficient for the purposes of this objective. | The types of accommodation that would be considered under Development Policy 29: Alternative Holiday Accommodation are low impact and small scale in nature; however the market for the types of alternative accommodation is continuously developing, resulting in different types of structures. Each proposal is to be considered on their own merit, where the primary consideration is given to the impact on the landscape. Where it is not appropriate for a unit(s) to remain all year round, the approved development will be subject to a condition that requires for the unit(s) to be removed from the site for a period of time. Depending on the structure of the unit(s), this would mean dismantling the unit, or moving the unit(s) as a whole to a storage facility. Para 17.12 is therefore worded to incorporate the different types of structures of alternative holiday accommodation units. Minor amendments within para 17.12 may be considered appropriate in order to clarify this. | Propose to amend para 17.12 with the following; <i>'17.12 The development must demonstrate that the accommodation units are truly temporary in nature and capable of being moved, or dismantled and moved, depending on the structure of the unit(s) when no longer in use. The visual impact of the site during the winter months, when there are no leaves on the trees, will be an important consideration. Whether the development will be permitted to remain all year round will depend on the proposal and setting.'</i> |
| 008 | 010 | Baileys and Partners | Objection | 17 | 17.12 | Argues that It would be more practical and make more sense to have all year round accommodation and have high quality and well-designed units that are adequately screened and capable of being moved should they need to do so. | Whether the alternative holiday accommodation unit(s) are considered appropriate to remain all year round, are dependent on the location and setting of these developments. Para 17.12 states; <i>'The visual impact of the site during the winter months, when there are no leaves on the trees, will be an important consideration. Whether the development will be permitted to remain all year round will depend on the proposal and setting.'</i> Para 17.12 therefore discloses that providing the units are located in a suitable location, they may be permitted to remain in situ all year round. | No changes proposed to para 17.12 in relation to all year round siting of alternative holiday accommodation units. |

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| 007 | 003 | Cadnant Planning | Objection | 17 | 17.12-16 | <p>Due to the temporary nature of the units, they are unlikely to be used as permanent dwellings and it is therefore overly prescriptive for the SPG to advise that they should not provide toilet and washing facilities within them and that these should be separate. If there are no other opportunities to convert existing buildings in order to provide such facilities, why do low impact facilities need to be provided separately? They are low impact and therefore can be assimilated into the site without the need for them to be separate.</p> | <p>Due to the nature of these developments and the criteria of para 6.48 adopted within Development Policy 29 of the LDP 2016-2031, para 17.15 and 17.16 of the SPG elaborates upon this criteria that these structures should not require the installation of utilities such as mains water, sewerage and electricity to attest their temporary nature, and provide minimal impact upon the landscape. However, as noted within Development Policy 29: Alternative Holiday Accommodation, criterion (iv) utilities and facilities can be located within an existing building or as an extension to existing facilities, and therefore does not exclude these amenities from these types of developments. This is proposed to be further clarified within para 17.15 of the SPG.</p> <p>Should no suitable building(s) be available, then in exceptional circumstances, in order to comply with the criteria adopted within the LDP 2016-2031, para 17.16 of the SPG gives further guidance on temporary and low impact facilities as part of the alternative holiday accommodation development proposal, such as compost toilets etc. This is also proposed to be further clarified within para 17.16 of the SPG.</p> | <p>For clarification purposes it is proposed to amend para 17.15 as following;</p> <p><i>'The emphasis of these developments is very much on small scale and 'back to nature' type developments. Environmental impact should be kept to an absolute minimum with proposals sitting as unobtrusively in the landscape as is possible. Large structures will not be supported, and self-contained units with toilets, showers etc should be avoided in order to keep units as small as possible. This also in order to ensures that these temporary structures are being used exclusively for holiday purposes and do not become full time, permanent dwellings. T,the structures should only provide basic facilities for sleeping, seating and eating, and not require the installation of utilities such as mains water, sewerage and electricity within the alternative accommodation units. The installation of these utilities should be provided separately through the conversion or extension of an existing building(s). This ensures the adherence of criteria Development Policy 22: Chalet and Static Caravan Sites that new permanent additional static caravan or chalet sites will not be permitted within the National Park.'</i></p> <p>For clarification purposes it is proposed to amend para 17.16 as following;</p> <p><i>'17.16 Ancillary F facilities such as showers or WC connected to mains water (if not already present) should be provided separately from the</i></p> |

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| | | | | | | | | <p>accommodation through the conversion or extension of existing building(s). <i>This ensures that redundant or under-utilised buildings are used, but also ensures that the units are as small and inconspicuous as possible.</i> In exceptional circumstances, if no suitable building(s) are available, the need for additional temporary and low impact facilities should needs to be clearly be demonstrated by the applicant and be commensurate with the nature and scale of the development and the character of the site within which it is located. <i>These ancillary facilities Facilities for such temporary structures could include compost toilet(s), solar powered lighting (dark sky compliant), rainwater harvesting, wood burning stove, gas burners etc. However, should the use cease, these facilities temporary structures must be removed. No additional permanent facilities will be permitted in order to conform to criteria (iv) of Development Policy 29. '</i></p> |
| 001 | 003 | Dioni | Objection | 17 | 17.15 | <p>Disagrees with the criteria noted in para 17.15 that the alternative holiday units should only provide basic facilities, as this would significantly reduce standards.</p> | <p>Due to the nature of these developments and the criteria of the policy adopted within the LDP 2016-2031, alternative holiday accommodation are types of low impact accommodation that are generally less intrusive in the landscape than the more traditional static and touring caravan. As stated in para 6.46 of the adopted LDP,</p> <p><i>'the accommodation structures will need to be temporary and capable of being moved when no longer in use. In order to ensure minimum impact on the landscape the use of hardstandings should only be where they are necessary.'</i></p> | <p>Propose following wording for clarity;</p> <p>For clarification purposes it is proposed to amend para 17.15 as following;</p> <p><i>' The emphasis of these developments is very much on small scale and 'back to nature' type developments. Environmental impact should be kept to an absolute minimum with proposals sitting as unobtrusively in the landscape as is possible. Large structures will not be supported, and self-contained units with toilets, showers etc should be avoided in order to keep units as small as</i></p> |

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| | | | | | | | <p>Para 17.15 of the SPG elaborates on this criteria. However, as noted within Development Policy 29: Alternative Holiday Accommodation, criterion (iv) utilities and facilities can be located within an existing building or as an extension to existing facilities, and therefore does not exclude these amenities from these types of developments. However, this could be further clarified within the SPG. Furthermore, the Welsh Government's brochure on 'Glamping Quality Standard' referred to in para 17.7 of the SPG provides information and guidance on high quality and standards for sustainable glamping developments that may be considered acceptable within the National Park in regards to alternative holiday accommodation development as each development is considered on its own merit.</p> | <p><i>possible. This also in order to ensures that these temporary structures are being used exclusively for holiday purposes and do not become full time, permanent dwellings. T,the structures should only provide basic facilities for sleeping, seating and eating, and not require the installation of utilities such as mains water, sewerage and electricity within the alternative accommodation units. The installation of these utilities should be provided separately through the conversion or extension of an existing building(s). This ensures the adherence of criteria Development Policy 22: Chalet and Static Caravan Sites that new permanent additional static caravan or chalet sites will not be permitted within the National Park.'</i></p> |
| 008 | 011 | Baileys and Partners | Objection | 17 | 17.15 | <p>Strongly disagrees with the statement in para 17.15 that only basic facilities are permitted to prevent unlawful use. Mains water, sewage and electricity are basic facilities and should be permitted. This requirement significantly limits the opportunities that are needed for farmers in Eryri to make a business case for providing alternative holiday accommodation and is, in discriminatory. There is no consistency in this approach when compared to other similar policies in other National Parks</p> | <p>The Local Development Plan (LDP) 2016-2031 has been formulated and examined by an Independent Planning Inspector to ensure that it defines the scope for future development in the area, based upon local evidence, monitoring and National Guidance, to reflect the National Park Authorities' statutory responsibilities. The approach to Alternative Holiday Accommodation developments has therefore been specifically formulated to ensure successful and appropriate development within the Snowdonia National Park area.</p> <p>Due to the nature of these developments and the criteria of the policy adopted within the LDP 2016-2031, alternative holiday</p> | <p>Propose following wording for clarity;</p> <p>For clarification purposes it is proposed to amend para 17.15 as following;</p> <p><i>' The emphasis of these developments is very much on small scale and 'back to nature' type developments. Environmental impact should be kept to an absolute minimum with proposals sitting as unobtrusively in the landscape as is possible. Large structures will not be supported, and self-contained units with toilets, showers etc should be avoided in order to keep units as small as possible. This also in order to ensures that these temporary structures are being</i></p> |

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| | | | | | | and the exclusion of such facilities will not facilitate the means by which physically less able persons would be able to choose to stay in alternative holiday accommodation which is a serious problem. | <p>accommodation are types of low impact accommodation that are generally less intrusive in the landscape than the more traditional static and touring caravan. As stated in para 6.46 of the adopted LDP,</p> <p><i>'the accommodation structures will need to be temporary and capable of being moved when no longer in use. In order to ensure minimum impact on the landscape the use of hardstandings should only be where they are necessary.'</i></p> <p>Para 17.15 of the SPG elaborates on this criteria. However, as noted within Development Policy 29: Alternative Holiday Accommodation, criterion (iv) utilities and facilities can be located within an existing building or as an extension to existing facilities, and therefore does not exclude these amenities from these types of developments. However, this could be further clarified within the SPG. Furthermore, the Welsh Government's brochure on 'Glamping Quality Standard' referred to in para 17.7 of the SPG provides information and guidance on high quality and standards for sustainable glamping developments that may be considered acceptable within the Snowdonia National Park in regards to alternative holiday accommodation development as each development is considered on its own merit.</p> | <i>used exclusively for holiday purposes and do not become full time, permanent dwellings. Tthe structures should only provide basic facilities for sleeping, seating and eating, and not require the installation of utilities such as mains water, sewerage and electricity within the alternative accommodation units. The installation of these utilities should be provided separately through the conversion or extension of an existing building(s). This ensures the adherence of criteria Development Policy 22: Chalet and Static Caravan Sites that new permanent additional static caravan or chalet sites will not be permitted within the National Park.'</i> |
| 001 | 004 | Dioni | Objection | 17 | 17.16 | Disagrees with the criteria noted in para 17.16 that facilities such as showers or WC connected to water mains should be provided separately from the alternative holiday units. | <p>Para 17.16 of the SPG stems from the criteria adopted in para 6.48 of the adopted LDP,</p> <p><i>'Additional facilities, such as showers or WC (if not already present) should be provided separately from the accommodation through the conversion or extension of an existing building(s). If no suitable buildings are</i></p> | For clarification purposes it is proposed to amend para 17.16 as following; <i>'17.16 Ancillary F facilities such as showers or WC connected to mains water (if not already present) should be provided separately from the accommodation through the conversion</i> |

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| | | | | | | | <p>available, the need for additional facilities needs to be clearly demonstrated by the applicant and commensurate with the scale of the development.'</p> <p>In addition, para 17.16 of the SPG includes 'No additional facilities will be permitted in order to conform to criteria (iv) of Development Policy 29.' Regarding standards, as recognised within the LDP, these types of developments are considered as a new and different type of offering within the National Park, and therefore it is encouraged to explore innovative sustainable visitor accommodation that respects the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities.</p> | <p>or extension of existing building(s). <i>This ensures that redundant or under-utilised buildings are used, but also ensures that the units are as small and inconspicuous as possible.</i> In exceptional circumstances, if no suitable building(s) are available, the need for additional temporary and low impact facilities needs to be clearly demonstrated by the applicant and commensurate with the nature and scale of the development and the character of the site within which it is located. <i>These ancillary facilities</i> Facilities for such temporary structures could include compost toilet(s), solar powered lighting (dark sky compliant), rainwater harvesting, wood burning stove, gas burners etc. However, should the use cease, these facilities temporary structures must be removed. No additional permanent facilities will be permitted in order to conform to criteria (iv) of Development Policy 29. '</p> |
| 003 | 004 | CLA | Objection | 17 | 17.16 | <p>Disagrees with the criteria that alternative holiday accommodation should only provide basic accommodation, and that facilities such as WCs and Showers should be provided separate to the units through the conversion of an existing building, when some units already contain these facilities. Also, is concerned of no existing buildings being available for conversion to provide these facilities.</p> | <p>It has been adopted following the revision and examination process of the LDP 2016-2031 within para 6.48 of the adopted LDP due to the sensitive landscape of the National Park that,</p> <p><i>'Additional facilities, such as showers or WC (if not already present) should be provided separately from the accommodation through the conversion or extension of an existing building(s). If no suitable buildings are available, the need for additional facilities needs to be clearly demonstrated by the applicant and commensurate with the scale of the development.'</i></p> | <p>For clarification purposes it is proposed to amend para 17.16 as following;</p> <p><i>'17.16 Ancillary F facilities such as showers or WC connected to mains water (if not already present) should be provided separately from the accommodation through the conversion or extension of existing building(s). This ensures that redundant or under-utilised buildings are used, but also ensures that the units are as small and inconspicuous as possible.</i> In exceptional circumstances, if no suitable building(s)</p> |

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| | | | | | | <p>Para 17.16 of the SPG therefore elaborates upon this criteria, giving guidance that in exceptional circumstances, temporary and low impact facilities could be permitted as part of the development proposal should no suitable building(s) be available. Amendments are proposed for clarification purposes regarding this criteria.</p> <p>Alternative Holiday Accommodation developments within the National Park are considered as a new and different type of offering, and therefore it is encouraged to explore innovative sustainable visitor accommodation that respects the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Amendments to para 17.17 are proposed to clarify this, however it is considered appropriate to also clarify this within para 17.4 of the SPG.</p> | <p>Para 17.16 of the SPG therefore elaborates upon this criteria, giving guidance that in exceptional circumstances, temporary and low impact facilities could be permitted as part of the development proposal should no suitable building(s) be available. Amendments are proposed for clarification purposes regarding this criteria.</p> <p>Alternative Holiday Accommodation developments within the National Park are considered as a new and different type of offering, and therefore it is encouraged to explore innovative sustainable visitor accommodation that respects the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Amendments to para 17.17 are proposed to clarify this, however it is considered appropriate to also clarify this within para 17.4 of the SPG.</p> | <p>are available, the need for additional temporary and low impact facilities should needs to be clearly be demonstrated by the applicant and be commensurate with the nature and scale of the development and the character of the site within which it is located. These ancillary facilities Facilities for such temporary structures could include compost toilet(s), solar powered lighting (dark sky compliant), rainwater harvesting, wood burning stove, gas burners etc. However, should the use cease, these facilities temporary structures must be removed. No additional permanent facilities will be permitted in order to conform to criteria (iv) of Development Policy 29.</p> <p>For clarification purposes it is also proposed to amend para 17.4 as following;</p> <p><i>'17.4 As Alternative Holiday Accommodation developments within the National Park are considered as a 'new' and different type of offering, it is encouraged to explore innovative sustainable visitor accommodation that preserves and enhances the 'Special Qualities' of the National Park, as well as promoting opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public, whilst also fostering the economic and social wellbeing of local communities. Proposals that are based on the principles of sustainable tourism as identified in section 5, which promote opportunities for the understanding, and</i></p> |

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| | | | | | | | | <i>enjoyment of the Special Qualities of the National Park will be supported.'</i> |
| 008 | 012 | Baileys and Partners | Objection | 17 | 17.16 | <p>Strongly disagrees with para 17.16 where showers and/or WC if not already present on the farm must be accommodated by additional facilities. A more logical solution would be to accommodate the requirements into one unit as oppose to having multiple units. This could mean twice the amount of development on the farm which could be avoided using units with facilities built in.</p> | <p>Para 17.16 of the SPG stems from the criteria adopted in para 6.48 of the adopted LDP,</p> <p><i>'Additional facilities, such as showers or WC (if not already present) should be provided separately from the accommodation through the conversion or extension of an existing building(s). If no suitable buildings are available, the need for additional facilities needs to be clearly demonstrated by the applicant and commensurate with the scale of the development.'</i></p> <p>Para 17.16 of the SPG therefore elaborates upon this criteria, giving guidance that in exceptional circumstances, temporary and low impact facilities could be permitted as part of the development proposal should no suitable building(s) be available. Amendments are proposed for clarification purposes regarding this criteria.</p> <p>Due to the nature of these developments and the criteria of the policy adopted within the LDP 2016-2031, alternative holiday accommodation are types of low impact accommodation that are generally less intrusive in the landscape than the more traditional static and touring caravan. As stated in para 6.47 of the adopted LDP,</p> <p><i>'They should only provide basic facilities for sleeping, seating and eating without the installation of water services or provision of drainage facilities for WC, showers and</i></p> | <p>For clarification purposes it is proposed to amend para 17.16 as following;</p> <p><i>'17.16 Ancillary F facilities such as showers or WC connected to mains water (if not already present) should be provided separately from the accommodation through the conversion or extension of existing building(s). This ensures that redundant or under-utilised buildings are used, but also ensures that the units are as small and inconspicuous as possible. In exceptional circumstances, if no suitable building(s) are available, the need for additional temporary and low impact facilities should needs to be clearly be demonstrated by the applicant and be commensurate with the nature and scale of the development and the character of the site within which it is located. These ancillary facilities Facilities for such temporary structures could include compost toilet(s), solar powered lighting (dark sky compliant), rainwater harvesting, wood burning stove, gas burners etc. However, should the use cease, these facilities temporary structures must be removed. No additional permanent facilities will be permitted in order to conform to criteria (iv) of Development Policy 29.'</i></p> |

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| | | | | | | | <p>washing. This ensures that such structures do not generate a level of permanence that could increase the level of landscape impact and site restoration should removal of the structures be required, for example should the use cease. The Authority will require a detailed strategy outlining how the land will be returned to its original condition and the use if the proposed use ceases...'</p> <p>Para 17.13 and para 17.16 of the SPG elaborates this criteria within the LDP 2016-2031, to ensure that these developments are small scale with the minimal impact upon the landscape.</p> | |
| 001 | 002 | Dioni | Objection | 17 | 17.17 | <p>Disagrees with the statement made in para 17.17 of the temporary nature not necessarily affecting the quality and standard of the alternative holiday units.</p> | <p>Due to the nature of these developments and the criteria of the policy adopted within the LDP 2016-2031, alternative holiday accommodation are types of low impact accommodation that are generally less intrusive in the landscape than the more traditional static and touring caravan. As stated in para 6.46 of the adopted LDP,</p> <p><i>'the accommodation structures will need to be temporary and capable of being moved when no longer in use.'</i></p> <p>The installation of utilities such as mains water within the units incorporates permanence that is not appropriate regarding these types of development within the National Park, and should therefore be provided separately from the units. Para 17.17 of the SPG gives</p> | <p>For clarification purposes it is proposed to include in para 17.17, the following;</p> <p><i>"This does necessarily mean that the quality will be of a lower standard; the 'quality' of alternative holiday accommodation can be measured in terms of the uniqueness of the experience in creating a memorable visit and not only in terms of 'luxury' facilities; see link below for Welsh Government's brochure on 'Glamping Quality Standard' for qualities of high standard sustainable glamping that may be considered as an acceptable development within the National Park."</i></p> |

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| | | | | | | | guidance on where to seek further advice by the Welsh Government on how to ensure a high quality standard of sustainable accommodation that might be considered acceptable within the Snowdonia National Park, as each development is assessed on its own merit. The Authority and the guidance by the Welsh Government considers 'Quality' regarding alternative holiday accommodation to be measured in terms of the uniqueness of the experience creating a memorable visit, not necessarily in terms of the 'luxury' facilities. | |
| 007 | 004 | Cadnant Planning | Objection | 17 | 17.7 | <p>Disappointed that the guidance offered in the SPG and therefore the aspirations of Snowdonia National Park Authority seeks to limit any Alternative Holiday Accommodation in Snowdonia National Park to only qualify for the basic Visit Wales Accreditation and not the Visit Wales Gold Award. Such an accreditation can only be achieved if units have a private bathroom (either within or very close to the unit) and guests would not be expected to pass any other accommodation en-route to their bathroom.</p> | <p>The guidance and requirements for bathroom facilities within the <i>Glamping Quality Standard</i>, regarding the 'Visit Wales Gold Award' accreditation states;</p> <p>'Bathrooms</p> <ul style="list-style-type: none"> • <i>The unit to have its own private bathroom. This might be within the unit or very close to the unit. For example, a bathroom for a shepherd's hut would sit adjacent to, or behind the hut.</i> • <i>Guests would not be expected to pass any other accommodation en-route to their bathroom.</i> • <i>Minimum 1 shower/bath, WC and washbasin for every 8 guests.</i> • <i>Showers must be hands-free and provide good water pressure.'</i> <p>The guidance within the <i>Glamping Quality Standard</i> therefore specifies that in order to achieve the Gold Award accreditation in terms of bathroom facilities, the unit shall have its own private bathroom either within the unit or located adjacent to the unit. The criteria adopted within the policy and expanded upon within the SPG does not exclude a unit having its own private bathroom facilities. Provided</p> | <p>For clarification purposes it is proposed to amend para 17.16 as following;</p> <p><i>'17.16 Ancillary F facilities such as showers or WC connected to mains water (if not already present) should be provided separately from the accommodation through the conversion or extension of existing building(s). This ensures that redundant or under-utilised buildings are used, but also ensures that the units are as small and inconspicuous as possible. In exceptional circumstances, if no suitable building(s) are available, the need for additional temporary and low impact facilities should needs to be clearly be demonstrated by the applicant and be commensurate with the nature and scale of the development and the character of the site within which it is located. These ancillary facilities Facilities for such temporary structures could include compost toilet(s), solar powered lighting (dark sky compliant), rainwater harvesting, wood burning stove, gas</i></p> |

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| | | | | | | | that the ancillary facilities proposed fit unobtrusively within the landscape, and is well screened by existing landscape features, additional temporary and low impact facilities may be considered appropriate development by the Authority with each case measured on its own merit. Para 17.16 of the SPG is proposed to be amended for clarification purposes. The Authority and the guidance by the Welsh Government considers 'Quality' regarding alternative holiday accommodation to be measured in terms of the uniqueness of the experience creating a memorable visit, not necessarily in terms of the 'luxury' facilities. Amendments are proposed within para 17.17 of the SPG to further clarify this. | <p><i>burners etc. However, should the use cease, these facilities temporary structures must be removed. No additional permanent facilities will be permitted in order to conform to criteria (iv) of Development Policy 29. '</i></p> <p>For clarification purposes it is proposed to include in para 17.17, the following;</p> <p><i>"This does necessarily mean that the quality will be of a lower standard; the 'quality' of alternative holiday accommodation can be measured in terms of the uniqueness of the experience in creating a memorable visit and not only in terms of 'luxury' facilities; see link below for Welsh Government's brochure on 'Glamping Quality Standard' for qualities of high standard sustainable glamping that may be considered as an acceptable development within the National Park."</i></p> |
| 007 | 005 | Cadnant Planning | Support | 17 | 17.7 | Agrees with the clarification that small scale relates to the capacity of the chosen site to assimilate the development into the landscape without competing for visual attention with the natural landscape. | Noted. | No changes proposed. |
| 008 | 013 | Baileys and Partners | Objection | 17 | 17.20-22 | Does not consider that treehouse developments would be better suited to mature commercial conifer plantations. Most coniferous trees are not native to the UK, the plantations are normally dark, damp and uninviting. This policy would not | <p>The statement made regarding Treehouse developments in para 17.20 of the SPG is the following;</p> <p><i>'As other policies in the ELDP protects trees and woodlands, and ancient woodlands in particular along with historic parks and gardens, treehouse developments would be</i></p> | <p>For clarification purposes it is proposed to amend para 17.20 as following;</p> <p><i>'As other policies in the ELDP protects trees and woodlands, and ancient woodlands in particular along with historic parks and gardens, treehouse developments would be better suited to</i></p> |

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| | | | | | | <p>promote and enhance the natural beauty of the National Park.</p> | <p><i>better suited to mature commercial conifer plantations.'</i></p> <p>The guidance provided within para 17.20 therefore, does not limit treehouse developments to mature commercial conifer plantations, it rather informs of the potential limitations of development within designated and protected sites. In order to clarify this within para 17.20, it may be considered appropriate to include minor amendments.</p> | <p><i>mature commercial conifer plantations, however each development proposal will be considered on its own merit.'</i></p> |