

SUPPLEMENTARY PLANNING GUIDANCE: MANAGING THE
USE OF DWELLINGS AS HOLIDAY HOMES (SECOND HOMES
AND SHORT-TERM HOLIDAY LETS)

CONSULTATION REPORT AND OFFICERS RECOMMENDATIONS



JUNE 2025

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1.0 BACKGROUND

Purpose of Supplementary Planning Guidance (SPG)

1.1 The purpose of SPGs is to:

- assist applicants and their agents in preparing planning applications and in guiding them in discussions with officers about how to apply relevant policies in the Joint Local Development Plan before submitting planning applications,
- assist officers to assess planning applications, and officers and councillors to make decisions about planning applications, and
- help Planning Inspectors to make decisions on appeals.

1.2 The general aim is to improve the quality of new developments and facilitate a consistent and transparent way of making decisions that align with relevant policies in the Joint Local Development Plan.

The Policy Context

Local Development Plan

1.3 Under planning legislation, the planning policies for every area are contained within the 'development plan'. The Gwynedd and Anglesey Joint Local Development Plan (JLDP) was adopted on 31 July 2017. It relates to the Gwynedd and Anglesey Planning Authority areas.

1.4 The Plan provides wide-ranging policies along with allocations for the main land uses, such as housing, employment and retail; it will help shape the future of the Plan area physically and environmentally, and will also influence it economically, socially and culturally. The Plan, therefore:

- enables the Local Planning Authorities to make rational and consistent decisions on planning applications by providing a policy framework that is consistent with national policy; and
- guides developments to suitable areas during the period up to 2026.

The need for Supplementary Planning Guidance

1.5 Although the Plan contains policies that enables the Local Planning Authority to make consistent and transparent decisions on development applications, it cannot provide all the detailed advice required by officers and prospective applicants to steer proposals locally. In order to provide this detailed advice, the Council is preparing a range of SPGs to support the Plan. The SPGs will provide more detailed guidance on a variety of topics and matters to help interpret and implement the Plan's policies and proposals.

1.6 It is important to note that this SPG is relevant to the Gwynedd Local planning Authority area only.

The Status of Supplementary Planning Guidance

- 1.7 Supplementary Planning Guidance (SPG) will be material planning considerations during the process of assessing and determining planning applications. Welsh Government and the Planning and Environment Decisions Wales (PEDW) will place considerable weight on supplementary planning guidance that stem from, and are consistent with, a development plan. The SPGs cannot introduce any new planning policies or amend existing policies.
- 1.8 Once they have been adopted SPGs should, therefore, be given substantial weight as a material planning consideration.

2.0 MANAGING THE USE OF DWELLINGS AS HOLIDAY HOMES (SECOND HOMES AND SHORT TERM LETS) SPG

- 2.1 The intention of the Supplementary Planning Guidance is to provide additional clarity relating to the type of information and evidence that should be submitted in relation to applications that specifically relate to the change of use of a dwelling house to holiday home use (second homes and short-term holiday let). The requirement to prepare the SPG derives from legislative changes that have been undertaken to the Town and Country Planning (Use Classes) Order and the Town and Country Planning (Permitted Development Rights) Order along with the introduction of the associated Article 4 Direction for the Gwynedd Local Planning Authority area.

Public Consultation

- 2.2 A draft version of this SPG was approved for public consultation by the Cyngor Gwynedd Cabinet on 11 February 2025. The draft SPG was prepared in consultation with relevant officers within the authority. Prior to this, the SPG was reviewed by the Planning Policy Working Group on 18 December 2024.
- 2.3 The SPG was the subject of a public consultation exercise between the 24 February and 7 April 2025.
- 2.4 Details of the public consultation were placed on the Council's website and emails/letters were sent to all Councillors, Community Councils, planning agents, statutory consultees, neighbouring authorities and those who had declared an interest in the SPG. Hard copies of the SPG were also available to inspect in all public libraries and in Siop Gwynedd (Caernarfon, Dolgellau and Pwllheli).
- 2.5 A number of platforms were available to respond to the consultation, including:
- Online form (Limesurvey)
 - Paper form
 - Email
 - Letter
- 2.6 A total of 28 duly made representations were received on the draft SPG by 24 different respondents. Careful consideration has been given to all of the representations received.

- 2.7 The following section (Appendix 1) summarises the representations received, the Councils' response to them and where appropriate, recommends any changes required to the SPG in lieu of the representations received. Any proposed change to the wording of the SPG is noted in a **bold font that has been underlined**.
- 2.8 In accordance with European Directive 2001/42/EC which is implemented in the UK through the Environmental Assessment of Plans and Programmes Regulations, a Screening Assessment has been prepared and was part of the suite of documents which formed the consultation. Representations received on the Screening Assessment and the Officers Response to the representations can be found in Appendix 2.
- 2.9 The Council is required (under the Equality Act 2010) to consider the impact that a change in any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. An Equality Impact Assessment must therefore be undertaken before a decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).
- 2.10 The Council is also required, under the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or creating a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English.
- 2.11 Further, in accordance with the Socio-economic Duty that came into force in Wales on 31 March 2021, public bodies have a duty to consider how strategic decisions, including setting objectives and developing public services, can reduce inequalities in terms of the outcome for people who face socio-economic disadvantage.
- 2.12 To this end, specific questions have been asked within the public consultation to address these requirements. Please see the following appendices for comments received during the public engagement period on the following aspects:-
- Integrated Equalities Impact Assessment (Appendix 3)
 - Protected equalities Characteristics (Appendix 4)
 - Consideration of the impact on the Welsh Language (Appendix 5)
 - Socio-Economic Duty (Appendix 6)

APPENDIX 1: Representations received on the SPG during the public consultation

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
P1.S1	Stephanie O'Neil	Article 4 Direction	Objection	It is in breach of our human rights to limit the change of use of a property after it has been purchased without such an encumbrance. For example, should we wish to sell we should be entitled to do what we like with our home which was bought in good faith and to sell to whoever we wish. After all it is our house, not part of Gwynedd Councils housing stock. Your housing stock are the council homes that you own, not my property.	I believe that such change of use is a material fact and condition and should therefore only be applied to new houses built since the imposition of the Article 4 direction and used in a similar way to a Section 106. Future profiting from property would therefore be limited without damaging the value of people's homes in the way that Article 4 does.	The representation received does not relate to the content of the Supplementary Planning Guidance. The representation relates to the principle of the Article 4 Direction. <u>Recommendation</u> – No Change
P2.S1	John Moss	Section 6	Objection	Properties located in remote rural locations are not favoured by local families (particularly young couples with children) as they are not convenient for schools, shops etc. This is why many were derelict before second homeowners renovated them and	Any property located in a rural location, that has not sold as a primary residence after 6 months on the market, should be given planning permission to be sold as a second home or holiday let.	Note the comment. The current policy framework does not allow for the flexibility to include guidance on exceptions in the assessment of planning applications as suggested. It is a requirement for the guidance contained within the SPG is to comply with local planning policy guidance as contained in

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				historically they only appeal as holiday lets or second homes.		the Joint Local Development Plan. <u>Recommendation</u> – No change
P3.S1	Stuart Rudlin	-	Objection	None noted	None noted	Note the general objection. <u>Recommendation</u> – No change
P4.S1	Glenis Bisson	12.14	Objection	Mixed use, C3/C6 should not require planning permission. Residents are not taking a property out of the housing stock.	Mixed use should be allowed without requiring planning permission as it does NOT comply with Article 4 as it is only temporarily renting for a short period. The council and Senedd have overreached their authority.	The representation received does not relate to the content of the Supplementary Planning Guidance. The representation relates to the principle of the Article 4 Direction. <u>Recommendation</u> – No change
P5.S1	Susan Roberts	Policy TAI 5	Objection	Stricter Controls	None noted	The representation received does not relate to the content of the Supplementary Planning Guidance. <u>Recommendation</u> – No change
P6.S1	James Woodcock	Section 8, para 8.6	Objection	Policy TAI 7 favours the conversion of traditional	The main burden of the SPG is providing guidance to	Note the comment. The representation received does not

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	(Partneriaeth Dyffryn Peris)			buildings outside settlements to holiday accommodation as opposed to affordable housing for local people in locations which would support local communities. This SPG should be used to lessen the evidence required to justify more opportunities for Affordable housing for local people.	prevent the change of use of housing to second homes and holiday homes which is supported. However, the SPG should detail how genuine proposals to change the use of traditional buildings to Affordable Housing in the countryside. The responsibility should be on the Council to justify the retail use as opposed to the developer.	relate to the content of the Supplementary Planning Guidance. <u>Recommendation</u> – No change
P7.S1	Alan Parry	-	Support	None specified	None specified	Note the general support. <u>Recommendation</u> – No change
P8.S1	Cricieth Town Council	-	Object	The consultation is complicated and difficult to follow and understand. The documentation is technical which is a concern for effective communication with the public.	None specified	It is appreciated that the document may appear complicated and technical. Every effort has been made to simplify the guidance included within the SPG. The subject matter is technical and therefore it is necessary for the SPG to be relatively technical. <u>Recommendation</u> – No change

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P9.S1	Mike Stevens	General	Object	<p>The representation discusses the shortcomings of policies related to second homes, holiday lets, and housing development in Gwynedd. The Council's approach to Council tax premium on second homes is criticised, arguing it hasn't solved the housing crisis for locals, especially first-time buyers. Despite second homes coming on the market, prices have fallen, and young people are still unable to afford homes. The policy is seen as damaging to tourism.</p> <p>Ineffective planning regulations, the slow pace of housing development, and outdated policies that hinder house building is also criticized. There is criticism of Cyngor Gwynedd's lack of ambition, poor planning, and resistance to change. The Council are focussed</p>	None specified	<p>Note the comment. The representation received does not relate to the content of the Supplementary Planning Guidance.</p> <p><u>Recommendation</u> – No change</p>

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				<p>on “affordable housing” meaning that planning applications are being refused. Further there is a lack of housing development in Tywyn as the development boundaries haven’t been reviewed in decades.</p> <p>The aim is to address the housing shortage, support Welsh-speaking communities, and improve the local economy by encouraging more housing development and better use of existing properties.</p> <p>A more dynamic and pragmatic approach to housing, including clearer tax policies and a review of outdated planning regulations to encourage sustainable development in Gwynedd required.</p>		
P10.S1	Katie Proctor	Section 7	Object	The proposed rules state that a criterion for this is whether the holiday let is “viable”, and if so, this will	The definition of “viable” should involve financial viability and not have this assumed in the case of	Viability in relation to the 182 rule relates to the popularity/demand for the short-

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				<p>not be allowed. Any application will not be allowed if 182 days letting is currently being achieved, as this is taken as an indication of financial viability. It will also have been necessary to market the property for a minimum of 12 months as a holiday let before any consideration is made of whether it can be changed to C5. We believe that this is wrong on many counts. First, it is profitability, not number of days let, that represent whether a holiday let is "viable". A holiday let that happens to be let for 182 days but makes little or no profit should not automatically be classed as "viable". We consider that having to market the property for 12 months as a holiday let, during which time it is inevitable that 182 days letting will not be achieved and so considerable costs</p>	<p>properties that are currently achieving 182 days letting. The requirement to have marketed the property for a minimum of 12 months as a holiday let should be removed.</p>	<p>term holiday let not to financial viability.</p> <p>The purpose of including the restrictions is to ensure that any successful holiday lettings which satisfy the demand aren't lost to an alternative use. Furthermore, it must be emphasised that holiday lets (C6 use class) which haven't been restricted for the specific use via a planning condition can change use to being main place of residence (C3 use class) as permitted development, therefore, an alternative use is possible without the requirement to apply for planning permission.</p> <p>It is suggested that further clarity is included within the SPG, detailing the requirement to safeguard existing tourism accommodation in accordance with the guidance which has been provided in Strategic Policy PS14: The Visitor Economy of the Joint Local Development Plan.</p>

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				<p>will be incurred, is a punitive measure that will cause considerable hardship. Given that at the end of this process there is no guarantee that the property will be allowed to transition to C5, this places an unrealistic bar on any C6 property. In effect, owners of C6 properties who wish to sell will need to invest sufficient money to cover the costs of the property being marketed for 12 months prior to knowing whether it can be sold as C5.</p> <p>This restriction also prevents owners of a C6 holiday let using the property themselves some of the time (which would be mixed use C6/C5) or if they cease trading as a holiday let, retaining the property as a second home (which is C5). The implication is therefore that an owner of a C6</p>		<p><u>Recommendation</u> – Amend paragraph 7.6 of the Supplementary Planning Guidance as follows:-</p> <p><i>“7.6 Short-term holiday lets provide an essential service to support the area’s visitor economy. <u>Criteria 5 of Strategic Policy 14: The Visitor Economy (Anglesey and Gwynedd Joint Local Development Plan)</u> stipulates that development which have an adverse impact on tourist facilities, including accommodation should be prevented. Therefore, it should be considered whether the holiday lets are viable and contribute towards meeting the demand.”</i></p>

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				<p>holiday let will need to sell the property if they cease trading. Many holiday let properties are ones that have been in families for generations. Forcing these to be sold when the business owner retires is a perverse outcome that will be detrimental to many Welsh family businesses.</p>		
P11.S1	Barmouth Town Council	Section 5	Object	<p>The change of use from C3 to C6 is not a loss of permanent housing stock. The property is still available to be used as permanent housing at any stage in the future. Movement from C6 to C3 is permitted development so can be done simply and without planning permission. Therefore, this statement should not be used as a blanket refusal to allow any transition from C3 to C6.</p> <p>This also applies to the other changes in use class</p>	<p>Remove the current paragraphs claiming that a move from C3 to C6 is a loss of permanent housing stock and refer to the other clauses as conditions for approval of change of use. Applies to sections 5 and 6 as well.</p>	<p>The introduction of the Article 4 Direction allows for the use of housing to be managed in a way that was not previously possible. The submission of a change of use planning application (C3 to C6) demonstrates the intent to use the property as a short-term holiday let (C6). Whilst it is acknowledged that it would be possible to revert from C6 use to C3 without the need to submit a planning application this does not guarantee that such a change will occur. Therefore, the unit cannot be counted towards the existing housing stock as it may never become available as a primary residence.</p>

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				that move from C3 to C5 or mixed use. Also, C5 to C6.		<u>Recommendation</u> – No change
P11.S2	Barmouth Town Council	Section 6	Object	<p>The percentage of second homes and holiday lets will vary by area. In an area which has a strong visitor economy it will have a higher percentage of Furnished Holiday Lets as these are essential to the local economy. The percentage should be set by the Town or Community Council, not the local planning authority. A blanket rate will encourage more second homes in areas adjacent to current hot spots spreading the issues further rather than containing them within a relatively small area.</p> <p>The conditions in the Guidance do not take into account the local housing need. If the local housing need is predominately for 2/3 bedroom houses in Council Tax bands A-D</p>	Vary the percentage threshold to reflect the local community and economy not have a blanket rate across the whole county. Add in a comparison with local housing needs to the SPG. This will ensure that houses that do not meet local housing needs can be used profitably in the area benefitting the local economy and community.	<p>The percentage threshold is in line with the existing Supplementary Planning Guidance: Tourist Accommodation and Facilities and thus ensures consistency when assessing planning applications.</p> <p>It is emphasised that the guidance contained within the SPG in relation to the relevant considerations when assessing the appropriateness of applications for change of use for short-term holiday let (C6 use) to second home use (C5 Use Class) seeks to acknowledge that successful holiday accommodation contributes towards maintaining a sustainable tourism economy. Furthermore, measures are in place to encourage main place of residence use (permitted development to change to C3) as a means of responding to the housing crisis and the local need for housing.</p>

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				then larger houses (>4 bedrooms or band F and upwards) are not removing houses from local need and should be regarded more favourably for moving from Use Class C3 to C5 or C6. These houses are often large and expensive to run so not suitable for local occupancy due to energy costs.		<u>Recommendation</u> – No change
P12.1	Deborah Lumley	-	General Comment	<p>I have lived in my house for nearly 39 years have bought up my family of 2 children and have worked locally.</p> <p>My children have been schooled in the area and are both Welsh speakers.</p> <p>I have had ill health and have struggled in the house we live in recently as we have no downstairs toilet.</p> <p>As a long-term permanent resident of Gwynedd my</p>	When locals sell houses why should they have to apply for planning and pay 2 and 1/2 times council tax while their house waits to sell. My understanding is that if you put your house on the market you get 12 months grace but I believe that it should be until the property sells, it is a real kick in the teeth to a permanent resident having to try and sell a property in the current climate without this unnecessary worry as well.	<p>The representation received does not relate to the content of the Supplementary Planning Guidance.</p> <p><u>Recommendation</u> – No change</p>

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				husband and I feel we will be penalised when we need to sell due to health issues to buy a more suitable residence to future proof our old age		
P13.1	Alan Williams	-	Support	Has to be implemented to support the right of young people to live in their own community	None noted	Note the supporting representation. <u>Recommendation</u> – No change
P14.S1	Emyr Glyn Williams	Section 7	Object	The proposed rules state that a criterion for this is whether the holiday let is “viable”, and if so, this will not be allowed. Any application will not be allowed if 182 days letting is currently being achieved, as this is taken as an indication of financial viability. It will also have been necessary to market the property for a minimum of 12 months as a holiday let before any consideration is made of whether it can be changed to C5. We believe that this is unfair on many counts.	The definition of “viable” should involve financial viability and not have this assumed in the case of properties that are currently achieving 182 days letting. The requirement to have marketed the property for a minimum of 12 months as a holiday let should be removed.	Viability in relation to the 182 rule relates to the popularity/demand for the short-term holiday let not to financial viability. The purpose of including the restrictions is to ensure that any successful holiday lettings which satisfy the demand aren't lost to an alternative use. Furthermore, it must be emphasised that holiday lets (C6 use class) which haven't been restricted for the specific use via a planning condition can change use to being main place of residence (C3 use class) as permitted development, therefore, there

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				First, it is profitability, not number of days let, that represent whether a holiday let is "viable". A holiday let that happens to be let for 182 days but makes little or no profit should not automatically be classed as "viable". We consider that having to market the property for 12 months as a holiday let, during which time it is inevitable that 182 days letting will not be achieved and so considerable costs will be incurred, is a punitive measure that will cause considerable hardship. Given that at the end of this process there is no guarantee that the property will be allowed to transition to C5, this places an unrealistic bar on any C6 property. In effect, owners of C6 properties who wish to sell will need to invest sufficient money to cover the costs of the property being marketed		<p>an alternative use is possible without the requirement to apply for planning permission.</p> <p>It is suggested that further clarity is included within the SPG, detailing the requirement to safeguard existing tourism accommodation in accordance with the guidance which has been provided in Strategic Policy PS14: The Visitor Economy of the Joint Local Development Plan.</p> <p><u>Recommendation</u> – Amend paragraph 7.6 of the Supplementary Planning Guidance as follows:-</p> <p><i>"7.6 Short-term holiday lets provide an essential service to support the area's visitor economy. <u>Criteria 5 of Strategic Policy 14: The Visitor Economy (Anglesey and Gwynedd Joint Local Development Plan)</u> stipulates that development which have an adverse impact on tourist facilities, including accommodation should be prevented. Therefore it should be</i></p>

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				<p>for 12 months prior to knowing whether it can be sold as C5.</p> <p>This restriction also prevents owners of a C6 holiday let using the property themselves some of the time (which would be mixed use C6/C5) or if they cease trading as a holiday let, retaining the property as a second home (which is C5). The implication is therefore that an owner of a C6 holiday let will need to sell the property if they cease trading. Many holiday let properties are ones that have been in families for generations. Forcing these to be sold when the business owner retires is a perverse outcome that will be detrimental to many Welsh family businesses.</p>		<i>considered whether the holiday lets are viable and contribute towards meeting the demand."</i>
P14.S2	Emyr Glyn Williams	C5/C6 to C3	General comment	I had the chance to let out my house as a full time rental for a year but when I made enquiries Cyngor	Houses that were C5/C6 before September 2024 should have the right to switch back and forth to C3	The concern expressed is not a matter for the Supplementary Planning Guidance. What is sought is controlled through the

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				Gwynedd told me that if I did that the house would be in C3 use and then I wouldn't be allowed to go and stay in it and let it out ever again.	provided that the owner does not change.	procedure of implementing the Article 4 Direction. <u>Recommendation</u> - No change
P15.S1	Gareth Lloyd	Object	The whole document	I object entirely to all these regulations; they are not required are anti English anti Tourism and anti Business. These are very harmful and are causing division within Wales. All very similar to Brexit which cost Wales £1.1bn in lost revenue in the first 3 years. This policy requirement is brainwashing and is just not necessary. Scrap the entire nonsense and instead build homes, allow planning permission for new homes and encourage business and tourism. You risk bankruptcy it's all madness.	Scrap the entire nonsense.	The main purpose of the SPG is to provide further guidance post implementation of the Article 4 Direction. It is considered necessary to clarify the local planning policy position via the SPG. <u>Recommendation</u> - No change
P16.S1	Janine Dow	Adran 7	Object	[None noted]	The definition of "viable" should involve financial viability and not have this	Viability in relation to the 182 rule relates to the popularity/demand for the short-

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					<p>assumed in the case of properties that are currently achieving 182 days letting. The requirement to have marketed the property for a minimum of 12 months as a holiday let should be removed.</p>	<p>term holiday let not to financial viability.</p> <p>The purpose of including the restrictions is to ensure that any successful holiday lettings which satisfy the demand aren't lost to an alternative use (C5 use). Furthermore, it must be emphasised that holiday lets (C6 use class) which haven't been restricted for the specific use via a planning condition can change use to being main place of residence (C3 use class) as permitted development, therefore, an alternative use (C3 use) is possible without the requirement to apply for planning permission.</p> <p>It is suggested that further clarity is included within the SPG, detailing the requirement to safeguard existing tourism accommodation in accordance with the guidance which has been provided in Strategic Policy PS14: The Visitor Economy of the Joint Local Development Plan.</p>

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						<p><u>Recommendation</u> – Amend paragraph 7.6 of the Supplementary Planning Guidance as follows:-</p> <p><i>“7.6 Short-term holiday lets provide an essential service to support the area’s visitor economy. <u>Criteria 5 of Strategic Policy 14: The Visitor Economy (Anglesey and Gwynedd Joint Local Development Plan)</u> stipulates that development which have an adverse impact on tourist facilities, including accommodation should be prevented. Therefore it should be considered whether the holiday lets are viable and contribute towards meeting the demand.”</i></p>
P17.S1	Dylan Bryn Roberts	-	Support	We support the Supplementary Planning Guidance: Managing the use of housing as holiday homes as a necessary attempt to regulate the number and scale of this type of housing due to their negative impact on average house prices in	[None noted]	<p>Note the supporting comment.</p> <p><u>Recommendation</u> - No change</p>

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				villages/towns/county. It is a genuine attempt to tackle the housing crisis which is evident in the fact the 65% of Gwynedd's population are unable to afford to buy a house on the open market.		
P18.S1	Fiona Hampton	Section 4	Object	<i>[None noted]</i>	This policy means that there will never be any possibility of changing a main house (C3) into a holiday let, irrespective of any local needs. I believe that there should be room for a case to be made on the basis of specific local requirements, rather than a blanket ban. There can be many reasons why a property is not best suited for a permanent residence but some other use, so flexibility needs to be allowed.	The guidance provided within the SPG must conform with the policies as contained within the Joint Local development Plan. Criteria iii of Policy TWR 2 clearly stipulates that no proposal should lead to the loss of the permanent housing stock. <u>Recommendation</u> – no change
P18.S2	Fiona Hampton	Section 7	Object	The proposed rules state that a criterion for this is whether the holiday let is "viable", and if so, this will not be allowed. Any application will not be	The definition of "viable" should involve financial viability and not have this assumed in the case of properties that are currently achieving 182 days letting.	Viability in relation to the 182 rule relates to the popularity/demand for the short-term holiday let not to financial viability.

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				<p>allowed if 182 days letting is currently being achieved, as this is taken as an indication of financial viability. It will also have been necessary to market the property for a minimum of 12 months as a holiday let before any consideration is made of whether it can be changed to C5. I believe that this is wrong on many counts. First, it is profitability, not number of days let, that represent whether a holiday let is "viable". A holiday let that happens to be let for 182 days but makes little or no profit should not automatically be classed as "viable". I consider that having to market the property for 12 months as a holiday let, during which time it is inevitable that 182 days letting will not be achieved and so considerable costs will be incurred, is a punitive measure that will</p>	<p>The requirement to have marketed the property for a minimum of 12 months as a holiday let should be removed.</p>	<p>The purpose of including the restrictions is to ensure that any successful holiday lettings which satisfy the demand aren't lost to an alternative use. Furthermore, it must be emphasised that holiday lets (C6 use class) which haven't been restricted for the specific use via a planning condition can change use to being main place of residence (C3 use class) as permitted development, therefore, there an alternative use is possible without the requirement to apply for planning permission.</p> <p>It is suggested that further clarity is included within the SPG, detailing the requirement to safeguard existing tourism accommodation in accordance with the guidance which has been provided in Strategic Policy PS14: The Visitor Economy of the Joint Local Development Plan.</p> <p><u>Recommendation</u> – Amend paragraph 7.6 of the Supplementary Planning Guidance as follows:-</p>

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				<p>cause considerable hardship. Given that at the end of this process there is no guarantee that the property will be allowed to transition to C5, this places an unrealistic bar on any C6 property. In effect, owners of C6 properties who wish to sell will need to invest sufficient money to cover the costs of the property being marketed for 12 months prior to knowing whether it can be sold as C5. This restriction also prevents owners of a C6 holiday let using the property themselves some of the time (which would be mixed use C6/C5) or if they cease trading as a holiday let, retaining the property as a second home (which is C5). The implication is therefore that any owner of a C6 holiday let will need to sell the property if they cease trading. Many holiday let</p>		<p><i>"7.6 Short-term holiday lets provide an essential service to support the area's visitor economy. <u>Criteria 5 of Strategic Policy 14: The Visitor Economy (Anglesey and Gwynedd Joint Local Development Plan)</u> stipulates that development which have an adverse impact on tourist facilities, including accommodation should be prevented. Therefore it should be considered whether the holiday lets are viable and contribute towards meeting the demand."</i></p>

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				properties are ones that have been in families for generations. Forcing these to be sold when the business owner retires is a perverse outcome that will be detrimental to many Welsh family businesses.		
P19.S1	Ben Spier	Section 4	Object	<p>"That the proposal will not result in a loss of permanent housing stock;" and clarifies this as "any proposal which would result in the loss of use of permanent housing stock (namely, use class C3) would be contrary to criterion iii of Policy TWR 2".</p> <p>In effect there will never be any possibility of changing a main house (C3) into a holiday let, irrespective of any local needs and irrespective of numbers of empty properties and 2nd homes locally, both of which contribute far less</p>	Having a blanket ban looks like fettering any discretion and there should be consideration of the need for holiday lets above 2nd homes, empty homes, landbanking - if there are significant numbers of those, which are having a much greater impact on housing stock, that factor shouldn't stop the conversion into a holiday let.	<p>The guidance provided within the SPG must conform with the policies as contained within the Joint Local development Plan. Criteria iii of Policy TWR 2 clearly stipulates that no proposal should lead to the loss of the permanent housing stock.</p> <p><u>Recommendation</u> – no change</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				to the local economy (2nd homes 6x less than holiday lets, empty homes nothing) and outnumber genuine holiday lets. Equally, the number of unbuilt planning permissions should be taken into account - such landbanking seriously harms local housing supply, again contributing nothing to local economies, unlike holiday let visitors.		
P20.S1	Alan Harper Smith	Section 4	Object	<i>[None noted]</i>	This states in relation to any proposal to create a new holiday let (C6) "That the proposal will not result in a loss of permanent housing stock;" and clarifies this as "any proposal which would result in the loss of use of permanent housing stock (namely, use class C3) would be contrary to criterion iii of Policy TWR 2" What this policy means is that there will never be any possibility of changing a	The guidance provided within the SPG must conform with the policies as contained within the Joint Local development Plan. Criteria iii of Policy TWR 2 clearly stipulates that no proposal should lead to the loss of the permanent housing stock. <u>Recommendation</u> – no change

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
					<p>main house (C3) into a holiday let, irrespective of any local needs. We believe that there should be room for a case to be made on the basis of specific local requirements, rather than a blanket ban.</p> <p>It should be possible to make a business case and not have this completely restricted under all circumstances.</p> <p>Why should a person buying a Freehold house have these blanket impositions placed on their property surely this is against the Freehold agreement that has been written in law for centuries.</p>	
P20.S2	Alan Harper Smith	Section 7	Object	The proposed rules state that a criterion for this is whether the holiday let is "viable", and if so, this will not be allowed. Any application will not be allowed if 182 days letting is currently being	<p>The definition of "viable" should involve financial viability and not have this assumed in the case of properties that are currently achieving 182 days letting. The requirement to have marketed the property for a</p>	<p>Viability in relation to the 182 rule relates to the popularity/demand for the short-term holiday let not to financial viability.</p> <p>The purpose of including the restrictions is to ensure that any</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				<p>achieved, as this is taken as an indication of financial viability. It will also have been necessary to market the property for a minimum of 12 months as a holiday let before any consideration is made of whether it can be changed to C5. We believe that this is wrong on many counts. First, it is profitability, not number of days let, that represent whether a holiday let is "viable". A holiday let that happens to be let for 182 days but makes little or no profit should not automatically be classed as "viable". We consider that having to market the property for 12 months as a holiday let, during which time it is inevitable that 182 days letting will not be achieved and so considerable costs will be incurred, is a punitive measure that will cause considerable hardship. Given that at the</p>	<p>minimum of 12 months as a holiday let should be removed.</p>	<p>successful holiday lettings which satisfy the demand aren't lost to an alternative use. Furthermore, it must be emphasised that holiday lets (C6 use class) which haven't been restricted for the specific use via a planning condition can change use to being main place of residence (C3 use class) as permitted development, therefore, there an alternative use is possible without the requirement to apply for planning permission.</p> <p>It is suggested that further clarity is included within the SPG, detailing the requirement to safeguard existing tourism accommodation in accordance with the guidance which has been provided in Strategic Policy PS14: The Visitor Economy of the Joint Local Development Plan.</p> <p><u>Recommendation</u> – Amend paragraph 7.6 of the Supplementary Planning Guidance as follows:-</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				<p>end of this process there is no guarantee that the property will be allowed to transition to C5, this places an unrealistic bar on any C6 property. In effect, owners of C6 properties who wish to sell will need to invest sufficient money to cover the costs of the property being marketed for 12 months prior to knowing whether it can be sold as C5. This restriction also prevents owners of a C6 holiday let using the property themselves some of the time (which would be mixed use C6/C5) or if they cease trading as a holiday let, retaining the property as a second home (which is C5). The implication is therefore that any owner of a C6 holiday let will need to sell the property if they cease trading. Many holiday let properties are ones that have been in families for</p>		<p>"7.6 Short-term holiday lets provide an essential service to support the area's visitor economy. <u>Criteria 5 of Strategic Policy 14: The Visitor Economy (Anglesey and Gwynedd Joint Local Development Plan)</u> stipulates that development which have an adverse impact on tourist facilities, including accommodation should be prevented. Therefore it should be considered whether the holiday lets are viable and contribute towards meeting the demand."</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				generations. Forcing these to be sold when the business owner retires is a perverse outcome that will be detrimental to many Welsh family businesses.		
P21.S1	Goronwy Owen	Para 6.11	Object	That the 15% figure used to determine the ceiling for change of use applications from Class use C3 to Class use C6 is an arbitrary % figure that has not been adequately substantiated.	Omit the final paragraph of 6.11 and replace with - "As a result, favourable consideration should not be given to applications to change the use of a main residence (use class C3) to second home use (use class C5 or mixed use) when the current combined provision of second homes and short-term holiday lets within the Community/Town/City Council area exceeds 25% of the housing stock. Council Tax (second home premium and self-catering non-domestic business rates) information should be used as the source to obtain this	<p>The guidance contained in this section relates to changing the use from C3 to C5 use, not C6 as referred to in the comment.</p> <p>No evidence has been presented that justifies why the threshold should be increased to 25%. The threshold has been set at 15% in order to achieve consistency with the existing SPG (Tourist Facilities and Accommodation).</p> <p><u>Recommendation</u> – no change</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
					information, as this is the most accurate and complete information source that is available."	
P22.S1	Arfon Hughes	-	Support	<i>[None noted]</i>	<i>[None noted]</i>	Note the supporting representation. <u>Recommendation</u> – No change
P23.S1	Nicola Williams (Tom Parry & Co)	Section 6	General representation	There is currently no guidance whatsoever for property professionals on use classes on an inherited property. An example which we have is an inherited property which is being sold. It used to be a main place of residence, however now, seen as it has been inherited by the descendants of the owner, which use class is it now? Clearly a second home to the now owners but not for the deceased. Does this mean inherited properties have to be sold as the Council will not allow the beneficiary to keep it? These needs clarifying.	<i>[None noted]</i>	The use class of the property will depend upon the actual use of the property. Therefore, although the beneficiaries of the estate now own two dwellings, the property would not require planning permission to be used as a second home unless the use was actually being made of the property for that specific purpose and in accordance with the definition of the Use Class. <u>Recommendation</u> – No change

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
P23.S2	Nicola Williams (Tom Parry & Co)	Para 1.2.7	General representation	<p>Does this have to be applied for in every case? We have clients with years and years' worth of council tax statements referring to a property being an SHL and being taxed accordingly. Are you now saying this isn't enough?? What are the timescales/criteria/fees for receiving such certification?</p> <p>These things need ironing out as a matter of urgency.</p>	[None noted]	<p>It is a matter for each individual if they wish to submit a Certificate of Lawful Use application, they are not required to do so.</p> <p><u>Recommendation</u> – No change</p>
P24.S1	Gareth Thomas (Natural Resources Wales)	General	General representation	<p>Where the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Zones 2, 3 or a Defended Zone, we would recommend that a suitable <i>limited</i> FCA be submitted in support of any planning application for these proposed developments. Although there may not be any material change to the</p>	[None noted]	<p>It is not considered appropriate to include this level of detail within the SPG. These requirements will need to be highlighted when considering and assessing planning applications in the same manner as other constraints (e.g. historic and environmental). The purpose of the SPG is to provide guidance in terms of the principle of use in accordance with policy guidance.</p>

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				<p>dwelling, the dwellings may be occupied by persons who may not be familiar with the area etc. Section 11.4 of the new TAN15, 31st March 2025 states that <i>"There are requirements that must be in place for any development that is permitted to be located in flood risk areas"</i>. One of these requirements is that <i>"occupiers are aware of flood risk"</i>. This may not be the case with holiday homes.</p> <p>Each dwelling may have its own specific flood risk, and some properties will be exposed to more frequent/severe flooding due to the scenic locations. Therefore, we recommend that a limited FCA be carried out which may have some form of flood action plan available (e.g. in welcome packs etc.) so that the flood risk can be communicated to</p>		<u>Recommendation</u> – No change

Ref number	Name	Section of the SPG	Nature of the representation	Comment	Requested amendments	Officers' response
				<p>those occupying the property.</p> <p>We would also draw your attention to the new TAN15, paragraph 3.5 which states <i>"Planning authorities should consider on the basis of the SFCA whether specific local planning policies are required to manage these risks for existing communities and in respect of new development"</i>.</p> <p>It will be for your Authority to decide whether the recommendation outlined above should be identified in the SPG.</p>		

Appendix 2: Responses received on the Screening Statement Strategic Environmental Assessment

Ref number	Name	Do you have any comments which you wish to make on the Strategic Environmental Statement Screening Statement?	Officers' response
P4.DS1	Glenis Bisson	Not in line with central government policy.	<p>Lack of information has been provided in relation to how the Strategic Environmental Screening Statement is not in line with central government policy. Due to the lack of information, it is not possible to further clarify the Screening Statements conformity with the requirement.</p> <p><u>Recommendation</u> – no change</p>
P10.DS1	Katie Proctor	<p>The statements contains the following passage; “The SPG covers the Gwynedd Local Planning Authority area. It will have a positive effect on the resident population in the area.”</p> <p>Gwynedd has introduced Article 4 Directions generically for the entire planning authority area rather than using such measures at far more targeted areas of, for example, high second homes or holiday lets. This action, which lacks focus or nuance, results in effects that differ depending on location.</p> <p>What might be an appropriate measure for certain areas is resulting in detrimental effects in others, particularly with respect to house prices in areas where there are not pressures relating to second home numbers. We therefore disagree with the statement that by covering the whole planning area, measures will always have a positive effect on the resident population.</p>	<p>It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not possible for the SPG to change the remit of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>
P14.DS1	Emyr Glyn Williams	Gwynedd has introduced Article 4 Directions generically for the entire planning authority area rather than using such measures at far more targeted areas of, for example, high	It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not

Ref number	Name	Do you have any comments which you wish to make on the Strategic Environmental Statement Screening Statement?	Officers' response
		<p>second homes or holiday lets. This action, which lacks focus or nuance, results in effects that differ depending on location.</p> <p>What might be an appropriate measure for certain areas is resulting in detrimental effects in others, particularly with respect to house prices in areas where there are not pressures relating to second home numbers. We therefore disagree with the statement that by covering the whole planning area, measures will always have a positive effect on the resident population.</p>	<p>possible for the SPG to change the realm of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>
P15.DS1	Gareth Lloyd	Scrap it.	<p>No detailed information/justification has been provided relating to why the Strategic Environmental Impact assessment should be scrapped, which makes it difficult to respond to the suggested request.</p> <p><u>Recommendation</u> – no change</p>
P16.DS1	Janine Dow	<p>Gwynedd has introduced Article 4 Directions generically for the entire planning authority area rather than using such measures at far more targeted areas of (for example) high second homes or holiday lets. This action, which lacks focus or nuance, results in effects that differ depending on location. What might be an appropriate measure for certain areas is resulting in detrimental effects in others, particularly with respect to house prices in areas where there are not pressures relating to second home numbers. We therefore disagree with the statement that by covering the whole planning area, measures will always have a positive effect on the resident population.</p>	<p>It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not possible for the SPG to change the remit of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>

Ref number	Name	Do you have any comments which you wish to make on the Strategic Environmental Statement Screening Statement?	Officers' response
P18.DS1	Fiona Hampton Mathews	<p>The statement contains the following: 2.5 The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected). "The SPG covers the Gwynedd Local Planning Authority area. It will have a positive effect on the resident population in the area."</p> <p>Gwynedd has introduced Article 4 Directions generically for the entire planning authority area rather than using such measures at far more targeted areas of (for example) high second homes or holiday lets. This action, which lacks focus or nuance, results in effects that differ depending on location. What might be an appropriate measure for certain areas is resulting in detrimental effects in others, particularly with respect to house prices in areas where there are not pressures relating to second home numbers. We therefore disagree with the statement that by covering the whole planning area, measures will always have a positive effect on the resident population.</p>	<p>It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not possible for the SPG to change the remit of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>
P19.DS1	Ben Spier	<p>The statement contains the following: "2.5 The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected). "The SPG covers the Gwynedd Local Planning Authority area. It will have a positive effect on the resident population in the area."</p> <p>The Art. 4 direction covers the entire planning authority area, instead of focusing on the specific areas with housing pressures. What might be an appropriate measure for certain areas is resulting in detrimental effects in others,</p>	<p>It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not possible for the SPG to change the remit of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>

Ref number	Name	Do you have any comments which you wish to make on the Strategic Environmental Statement Screening Statement?	Officers' response
		particularly with respect to house prices in areas where there are not pressures relating to second home numbers. So I disagree with this statement.	
P20.DS1	Alan Harper Smith	<p>The statement contains the following:</p> <p>2.5 The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected). "The SPG covers the Gwynedd Local Planning Authority area. It will have a positive effect on the resident population in the area."</p> <p>Gwynedd has introduced Article 4 Directions generically for the entire planning authority area rather than using such measures at far more targeted areas of (for example) high second homes or holiday lets. This action, which lacks focus or nuance, results in effects that differ depending on location.</p> <p>What might be an appropriate measure for certain areas is resulting in detrimental effects in others, particularly with respect to house prices in areas where there are not pressures relating to second home numbers.</p> <p>We therefore disagree with the statement that by covering the whole planning area, measures will always have a positive effect on the resident population.</p>	<p>It is important to emphasise that the purpose of the SPG is to provide guidance on the local planning policy considerations post implementation of the Article 4 Direction. It is not possible for the SPG to change the remit of the Article 4 Direction.</p> <p><u>Recommendation</u> – no change</p>

Appendix 3: Responses received on the Integrated Equalities Impact Assessment

Ref number	Name	Do you have any comments which you wish to make on the Integrated Impact Assessment?	Officer' response
P1.AE1	Staphanie O'Neil	I think the council was too quick to implement Article 4 with too few facts and figures at their disposal. I also believe it was too broad a geographically area, it has seriously damaged the wealth of the area and will hinder re-sale of property, lower council tax payments, and ensure that the older generation ready for care homes will now need to rely on council handouts as their property is not worth what they'd hoped for and limited funds available to help with payments for care in later life.	The representation does not relate to the SPG. <u>Recommendation</u> – no change
P10.AE1	Katie Proctor	The impact assessment includes the statement "On average, 65% of the Gwynedd population has been priced out of the housing market". This is part of the justification for Article 4 directions. However, Welsh government statistics (https://senedd.wales/media/vkxlz4ky/gwyneddenglish.pdf) state "There are around 49,200 households in Gwynedd, 66.6% of which are owner occupied." These 2 statements are at odds with each other. Which is true? Stop massaging the figures for your own benefit!	The number of people who have been priced out of the market is based on income and average house prices. The information provided is based on the most current data available. <u>Recommendation</u> – Amend the wording to provide further clarification as to the how the % of households priced out of the market has been calculated. "On average, 65% of the Gwynedd population has been priced out of the housing market (<u>figure is based on average household income and average house price</u>)."
P11.AE1	Barmouth Town Council	The negative impacts of Article 4 are already being seen in that local people can not sell their houses to move (be that up-sizing, down-sizing or moving away). The ability to buy houses is also dependant on having a job with suitable income. The lack of buyers is not a reflect on the price of the house, but on the ability of the purchaser to get a mortgage.	The information provided within the Integrated Equalities Impact assessment is based upon the most current information available and will be amended accordingly. Any impact identified following the consultation period will be

Ref number	Name	Do you have any comments which you wish to make on the Integrated Impact Assessment?	Officer' response
		Mortgages are not available due to the lack of good jobs. The loss of value on the housing stock owned by local people has not been calculated or taken into account on this impact assessment. Paragraph 4.2 claims that this impact is not significant, that statement can not be made without a calculation of the cost to local residents. Section 4.4 claims that attempts have been made to mitigate the negative impacts – what are those attempts?	<p>reflected within an amended version of the document.</p> <p>No robust and tangible evidence has been provided which suggests how the prospective SPG impacts house prices.</p> <p><u>Recommendation</u> – no change</p>
P12.AE1	Deborah Lumley	There has been no consideration to locals	<p>The assessment recognises that introducing the SPG will have a direct and indirect impact upon everyone, which therefore inevitably includes locals.</p> <p>The information provided within the Integrated Equalities Impact assessment is based upon the most current information available and will be amended accordingly. Any impact identified following the consultation period will be reflected within an amended version of the document.</p> <p><u>Recommendation</u> – no change</p>
P14.AE1	Emyr Glyn Williams	This policy, which has some good points, does not recognise that the main reason there are homeless people in Gwynedd is that the council and associated politicians have failed to meet the need for affordable housing over the last 50 years. Selling council houses and not rebuilding them is bound to cause problems as anyone with any information can see. The MP for Meirion Dwyfor said that people in her constituency were leaving the area to find cheaper housing but when challenged she failed to name the areas of these cheaper houses. The only areas of cheaper	<p>The representation is noted, however it fails to address the SPG directly.</p> <p>The information provided within the Integrated Equalities Impact assessment is based upon the most current information available and will be amended accordingly. Any impact identified following the consultation period will be</p>

Ref number	Name	Do you have any comments which you wish to make on the Integrated Impact Assessment?	Officer' response
		housing will be in economically depressed areas often with large immigrant communities. The truth is that people are leaving to find work because these politicians have failed to bring work into Gwynedd. The destruction of the tourism industry will make things worse. Also, it is clear to me that where this policy succeeds in driving out C5/6 people, they are quite often replaced by retiring English C3 people in the area.	reflected within an amended version of the document. <u>Recommendation</u> – no change
P15.AE1	Gareth Lloyd	Scrap it	No detailed information/justification has been provided to support the statement. <u>Recommendation</u> – no change
P16.AE1	Janine Dow	The impact assessment includes the statement “On average, 65% of the Gwynedd population has been priced out of the housing market”. This is part of the justification for Article 4 Directions. However, Welsh government statistics state (https://senedd.wales/media/vkxlz4ky/gwynedd-english.pdf): “There are around 49,200 households in Gwynedd, 66.6% of which are owner occupied.” These two statements seem incompatible.	The number of people who have been priced out of the market is based on income and average house prices. The information provided is based on the most current data available. <u>Recommendation</u> – Amend the wording to provide further clarification as to the how the % of households priced out of the market has been calculated. “On average, 65% of the Gwynedd population has been priced out of the housing market (<i>figure is based on average household income and average house price</i>).”
P18.AE1	Fiona Hampton Mathews	The impact assessment includes the statement “On average, 65% of the Gwynedd population has been priced out of the housing market”. This is part of the justification for Article 4 Directions. However, Welsh government statistics state	The number of people who have been priced out of the market is based on income and average house prices. The information provided is based on the most current data available.

Ref number	Name	Do you have any comments which you wish to make on the Integrated Impact Assessment?	Officer' response
		<p>(https://senedd.wales/media/vkxlz4ky/gwynedd-english.pdf):</p> <p>"There are around 49,200 households in Gwynedd, 66.6% of which are owner occupied."</p> <p>These two statements seem incompatible</p>	<p><u>Recommendation</u> – Amend the wording to provide further clarification as to the how the % of households priced out of the market has been calculated.</p> <p>"On average, 65% of the Gwynedd population has been priced out of the housing market (<u>figure is based on average household income and average house price</u>)."</p>
P19.AE1	Ben Spier	<p>It states that "On average, 65% of the Gwynedd population has been priced out of the housing market."</p> <p>Yet, according to the Gwynedd Accommodation Review https://www.visitsnowdonia.info/sites/default/files/2023-09/Cynllun%20EYCGE%20Saesneg_0.pdf</p> <p>In Gwynedd there are:</p> <p>Number of homes 61,645</p> <p>Number of second homes 4,873</p> <p>Number of self-catering Holiday units (non-domestic unit) 1,976.</p> <p>If the 65% stat is correct, it can't be as a result of holiday lets (which bring visitor spend to Gwynedd) - the target ought to be the 2nd and empty homes and the unbuilt planning permissions.</p>	<p>The number of people who have been priced out of the market is based on income and average house prices. The information provided is based on the most current data available.</p> <p><u>Recommendation</u> – Amend the wording to provide further clarification as to the how the % of households priced out of the market has been calculated.</p> <p>"On average, 65% of the Gwynedd population has been priced out of the housing market (<u>figure is based on average household income and average house price</u>)."</p>
P20.AE1	Alan Harper Smith	<p>The impact assessment includes the statement "On average, 65% of the Gwynedd population has been priced out of the housing market". This is part of the justification for Article 4 Directions.</p>	<p>The number of people who have been priced out of the market is based on income and average house prices. The information provided is based on the most current data available.</p>

Ref number	Name	Do you have any comments which you wish to make on the Integrated Impact Assessment?	Officer' response
		<p>However, Welsh government statistics state (https://senedd.wales/media/vkxlz4ky/gwynedd_english.pdf):</p> <p>"There are around 49,200 households in Gwynedd, 66.6% of which are owner occupied."</p> <p>These two statements seem incompatible.</p>	<p><u>Recommendation</u> – Amend the wording to provide further clarification as to the how the % of households priced out of the market has been calculated.</p> <p>"On average, 65% of the Gwynedd population has been priced out of the housing market (<u>figure is based on average household income and average house price</u>)."</p>
P20.AE2	Alan Harper Smith	<p>For the specific case of holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when the sector is facing multiple financial challenges from a large number of recent legislative changes (182 day rule, FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language as if the business closes, then this risks the owners (and their families) having to relocate for work.</p>	<p>The point is noted.</p> <p><u>Recommendation</u> – Amend section 3.1 of the Integrated Impact Assessment (Welsh Language) to reflect the representation received.</p> <p><u>"Negative</u></p> <p><u>It is possible that Welsh speakers might be seeking the opportunity to use a dwelling house for holiday purposes (short-term let or second homes), the parameters which have been placed within the SPG might prohibit the ability to do so and mean that the Welsh speakers will seek opportunities elsewhere, which would inevitably have detrimental impact upon the Welsh language."</u></p>

Appendix 4: Responses received on the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunity to use the language and its status within the community

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
P1.NC1	Stephanie O'Neil	Negative impact	I, as a Welsh speaker for 27 years no longer use the language and would rather leave the area due to draconian measures being implemented by the Council. I do not want to live in an undemocratic society, one where I am dictated to.	The comment is noted. A lack of evidence has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. <u>Recommendation</u> – No change
P2.NC1	John Moss	Neutral	If the Welsh Language is to survive it should not be artificially propped up by manipulation.	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. <u>Recommendation</u> – No change
P3.NC1	Stuart Rudlin	Limited negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P4.NC1	Glenis Bisson	Negative impact	More people are now encouraged to leave the area as the Council imposes more control on their lives. The youth leave to find good jobs not because of housing. More retirees will come as the prices are cheap, therefore depleting the language further.	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
P5.NC1	Susan Roberts	Neutral	Whilst Wales gives preference on housing lists to ex-criminals and illegal migrants there will never be enough homes for locals. A nation of sanctuary is one worthy thing, a dumping ground in return for cash incentives is something else.	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. <u>Recommendation</u> – No change
P25.NC1	Elaine Bamber	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P26.NC1	Anwen Jones	Limited positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P6.NC1	James Woodcock	Positive impact	If the SPG supports fair proposals to convert traditional buildings into affordable housing for local people even in the countryside. This will give Welsh speaking local people more opportunities to live in Dyffryn Peris.	The policy change which is being sought is not possible through this SPG. SPG's must be in conformity with the policies included within the adopted Local Development Plan. Recommendation - No change
P7.NC1	Alan Parry	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P10.NC1	Katie Proctor	Limited negative impact	For holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
			the sector is facing multiple financial challenges from large number of recent legislative changes (182 day rule, FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language. If the business closes, then this risks the owners (and their families) having to relocate.	<p>the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan.</p> <p>Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation.</p> <p><u>Recommendation</u> – No change</p>
P11.NC1	Heather Brown (Abermaw Community Council)	Negative impact	Overall tone of the SPG is that the Welsh language is the overriding objective of all decisions. The Welsh language cannot be supported by planning control alone, an aim to support the local community with high-quality jobs and opportunities should take precedence as this is fundamental to enable the support of the Welsh language. Without a vibrant economy and good job opportunities, local Welsh speakers will need to leave the area.	<p>The comment is noted. There is a duty on Local Authorities to assess the impact of the Council's policies and decisions on opportunities to use the Welsh language and not treating the language less favourably than English.</p> <p><u>Recommendation</u> – No change</p>

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
P12.NC1	Deborah Lumley	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P13.NC1	Alan Williams	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P14.NC1	Emyr Williams Glyn	Negative impact	For the specific case of holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when the sector is facing multiple financial challenges from a large number of recent legislative changes (182 day rule, FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language as if the business closes, then this risks the owners (and their families) having to relocate for work. My house is a mixed C5/C6 which means	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan. Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
			that during the Winter months, when we can't get people to stay (I know that Gwynedd Council as a supporter of 182 days doesn't believe that) our family are able to come down and mix with the community, our friends and our Welsh speaking family. The houses that have recently been sold near our home have all been bought by English speaking people after moving to the area full time. Gwynedd Council's policy to build affordable housing in the villages of Penllyn and fill them with English does much more harm to the Welsh language in the area.	
P15.NC1	Gareth Lloyd	Negative impact	Speak Welsh in Schools.	The response is noted, however it is unrelated to the SPG. <u>Recommendation</u> – No change
P16.NC1	Janine Dow	Negative impact	For the specific case of holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when the sector is facing multiple financial challenges from a large number of recent legislative changes (182 day rule,	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan.

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
			FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language as if the business closes, then this risks the owners (and their families) having to relocate for work	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change
P17.NC1	Dylan Bryn Roberts	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P18.NC1	Fiona Hampton-Matthews	Negative impact	For the specific case of holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when the sector is facing multiple financial challenges from a large number of recent legislative changes (182 day rule, FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan. Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
			closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language as if the business closes, then this risks the owners (and their families) having to relocate for work	Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change
P19.NC1	Ben Spier	Negative impact	51% of the self-catering property owners who list with us live within 5 miles of the property and on average each of our owners list an average of 1.3 properties each. They are facing multiple pressures (182 day threshold, EPC requirements, NIC increases, FHL regime abolished, council tax premiums, possible levy, licensing scheme etc). A very large proportion of holiday let within Gwynedd are run by Welsh speaking families and so business closures are a significant threat to the Welsh language as if the business closes, the owner and family have to relocate for work. The loss of the visitors to their now lost holiday let also would've been spending in other local hospitality businesses.	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan. Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
P20.NC1	Alan Harper-Smith	Negative impact	For the specific case of holiday lets, the pressures that are placed on owners by the restrictions imposed on use that come at a time when the sector is facing multiple financial challenges from a large number of recent legislative changes (182 day rule, FHL taxation changes, business rate rises, EPC requirements, fire regulations, waste regulations, employer NI increases, minimum wage increases) are resulting in a large number of such businesses facing closure. As a very large proportion of holiday let businesses within Gwynedd are family run and Welsh speaking, business closures are a significant threat to the Welsh language as if the business closes, then this risks the owners (and their families) having to relocate for work	<p>The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan.</p> <p>Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation.</p> <p><u>Recommendation</u> – No change</p>
P21.NC1	Goronwy Owen	Neutral	[None noted]	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on the Welsh language, the opportunities to use the language and its status within the community?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on the Welsh Language and its use, or to remove any negative effects.	Officers' response
P22.NC1	Arfon Hughes	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P23.NC1	Nicola Williams	Neutral	It has nothing to do with the Welsh language. This whole thing has been about driving out tourists who support the economy. The Welsh language will die out as you are pushing people further afield to work as there will be no employment opportunities here.	The comment is noted. A lack of information has been provided as to how the adoption of the SPG would impact the Welsh language and opportunities to use the language and its status. It is necessary for the SPG to conform with the policies as contained within the development plan. Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change

Appendix 5: Responses received on the consideration of the impact on protected characteristics

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P1.IC1	Stephanie O'Neil	Negative impact	I think a lowering of the price of property locally will encourage people from poorer areas of the UK to move in and establish themselves. I doubt very much if English is their second language that they would wish to learn another such as Welsh. Therefore, the guidance is going to have the opposite effect from the councils wish to increase the use of the Welsh language and I see it as having a detrimental effect.	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics, including the Welsh language. The Integrated Impact Assessment will be amended following the public consultation. <u>Recommendation</u> – No change
P2.IC1	John Moss	Negative impact	Older people who wish to provide finance for their care or move to be nearer family will be disadvantaged as they cannot sell at the best price as second home/holiday	The SPG does not introduce guidance which restricts owners right to sell a property on the open market. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
			let owners will be banned from purchasing.	
P3.IC1	Stuart Rudlin	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P4.IC1	Glenis Bisson	Negative impact	More control, more people leave.	The representation hasn't detailed how the implementation of the SPG (specifically) will result in more people leaving the area. It is assumed that the powers referenced relate to the Article 4 Direction. This consultation related to the SPG not to the principle of the Article 4 Direction. <u>Recommendation</u> – No change
P5.IC1	Susan Roberts	Negative impact	Again, adhere to stricter controls.	Note the response. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P25.IC1	Elaine Bamber	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P26.IC1	Anwen Jones	Neutral	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P6.IC1	James Woodcock	Positive impact	If the SPG supports fair proposals to convert traditional buildings into affordable housing for local even in the countryside. This will give groups of people with specific equality characteristics more opportunities to live in suitable housing in Dyffryn Peris.	Note the response, however this is outside the remit of this SPG. <u>Recommendation</u> – No change
P7.IC1	Alan Parry	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P10.IC1	Katie Proctor	Limited negative impact	Research shows that the majority of holiday let businesses are run by women, with 45% being over 60. The impact of changes that affect the viability of holiday lets will therefore predominantly affect this demographic.	<p>Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated Impact Assessment will be amended following the public consultation.</p> <p>The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications.</p> <p><u>Recommendation</u> – No change</p>
P11.IC1	Heather Brown (Abermaw Town Council)	Neutral	It will have an equally negative effect on all people.	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>
P12.IC1	Deborah Lumley	Negative impact	[None noted]	Note the response.

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
				<u>Recommendation</u> – No change
P13.IC1	Alan Williams	Positive impact	To allow Welsh speakers to stay in their community and protect the language	The response is noted. <u>Recommendation</u> – No change
P14.IC1	Emyr Glyn Williams	Negative impact	This is my wife's business who is also Welsh, so the policy is against women and the elderly (75) who speak Welsh.	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated Impact Assessment will be amended following the public consultation. The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications. <u>Recommendation</u> – No change
P15.IC1	Gareth Lloyd	Negative impact	This whole policy is not necessary.	Note the response. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P16.IC1	Janine Dow	Negative impact	Research shows that the majority of holiday let businesses are run by women, with 45% being over 60. The impact of changes that affect the viability of holiday lets will therefore predominantly affect this demographic.	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated Impact Assessment will be amended following the public consultation. The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications. <u>Recommendation</u> – No change
P17.IC1	Dylan Bryn Roberts	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P18.IC1	Fiona Hampton-Matthews	Limited negative impact	My research shows that the majority of holiday let businesses are run by women, with 45% being over 60. The impact of changes that affect the viability of holiday	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
			lets will therefore predominantly affect this demographic. The stress on dealing with new planning guidance will have a negative impact on them	Impact Assessment will be amended following the public consultation. The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications. <u>Recommendation</u> – No change
P19.IC1	Ben Spier	Negative impact	The majority of holiday lets are run by women, with 45% being over 60. The impact of changes, if causing holiday lets to close, will therefore predominantly affect this demographic.	Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated Impact Assessment will be amended following the public consultation. The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P20.IC1	Alan Harper-Smith	Negative impact	Our research shows that the majority of holiday let businesses are run by women, with 45% being over 60. The impact of changes that affect the viability of holiday lets will therefore predominantly affect this demographic.	<p>Throughout the process of preparing the SPG an Integrated Impact Assessment has been undertaken to assess the possible impact on protected characteristics. The Integrated Impact Assessment will be amended following the public consultation.</p> <p>The SPG doesn't treat any individual differently nor does the process of determining prospective planning applications.</p> <p><u>Recommendation</u> – No change</p>
P21.IC1	Goronwy Owen	Neutral	<i>[None noted]</i>	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>
P22.IC1	Arfon Hughes	Positive impact	<i>[None noted]</i>	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on groups of people with specific equality characteristics (which are Race (including nationality), Disability, Sex, Age, Sexual orientation, Religion or belief (or non-belief), Gender reassignment, Pregnancy and maternity, Marriage and civil partnership, The Welsh language, Socio-Economic Disadvantage)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on groups of people with specific equality characteristics, or to remove any negative effects.	Officers' response
P3.IC1	Nicola Williams	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change

Appendix 6: Responses received on the socio-economic duty question

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on those who are socio-economically disadvantaged (for example, financial poverty, digital poverty, no easy access to services and events)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on those who are socio-economically disadvantaged, or to remove any negative effects.	Officers' response
P1.EA1	Stephanie O'Neil	Negative impact	Cheaper property, will no doubt increase the movement of people from other areas who may need to avail themselves of health care, social services, etc.	Note the response however no evidence has been provided which supports this statement. <u>Recommendation</u> – No change
P2.EA1	John Moss	Negative impact	These groups need social housing.	Note the response but it does not appear to be related to the contents of the SPG. <u>Recommendation</u> – No change
P3.EA1	Stuart Rudlin	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P4.EA1	Glenis Bisson	Neutral	They still can't afford a mortgage, so no impact at all.	Note the response but it does not appear to be related to the contents of the SPG. <u>Recommendation</u> – No change
P5.EA1	Susan Roberts	Neutral	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on those who are socio-economically disadvantaged (for example, financial poverty, digital poverty, no easy access to services and events)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on those who are socio-economically disadvantaged, or to remove any negative effects.	Officers' response
P25.EA1	Elaine Bamber	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P26.EA1	Anwen Jones	Neutral	-	Note the response. <u>Recommendation</u> – No change
P6.EA1	James Woodcock	Positive impact	If the SPG supports fair proposals to convert traditional buildings into affordable housing for local people even in the countryside. This will give people facing socio-economic disadvantage with more choice for suitable housing in Dyffryn Peris.	Note the response, however the change which is being proposed here is outside the remit of this SPG. <u>Recommendation</u> – No change
P7.EA1	Alan Parry	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P10.EA1	Katie Proctor	Negative impact	Introducing this Supplementary Planning Guidance will bring more people into the categories of socioeconomically disadvantage, through loss of jobs and loss of income. Enforcing unrealistic criteria to measure the business viability of furnished holiday lets will have severe consequences,	Note the response however no evidence has been provided which supports this representation. The SPG will not impact current holiday lets as the ability to use an established short-term let can continue (established pre implementation of the Article 4 Direction). It seems that the regulations which are referenced are not hosed which are

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on those who are socio-economically disadvantaged (for example, financial poverty, digital poverty, no easy access to services and events)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on those who are socio-economically disadvantaged, or to remove any negative effects.	Officers' response
			<p>leading to financial instability for hardworking Welsh people who rely on this sector for their livelihood. By imposing impractical regulations, many small-scale holiday let owners who have invested significant time, effort, and resources will find their businesses deemed unviable, forcing them to shut down. This will result in widespread socio-economic disadvantage, including:</p> <ul style="list-style-type: none"> • Loss of Income – Welsh families who depend on holiday lets as their primary or supplementary income will face financial hardship. • Increased Unemployment – Those working in maintenance, cleaning, and other hospitality services linked to holiday lets will lose jobs. • Economic Decline in Rural Areas – Communities that rely on tourism spend will see a downturn, affecting local shops, restaurants, and suppliers. • Housing Market Disruptions – Property 	<p>beyond the control of the Planning system or the SPG specifically.</p> <p><u>Recommendation</u> – No change</p>

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on those who are socio-economically disadvantaged (for example, financial poverty, digital poverty, no easy access to services and events)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on those who are socio-economically disadvantaged, or to remove any negative effects.	Officers' response
			<p>devaluation and increased financial strain on homeowners who may struggle with mortgage repayments.</p> <ul style="list-style-type: none"> • Social and Cultural Impact – The loss of a thriving tourism industry could diminish community vibrancy, with fewer visitors supporting local events and traditions. Rather than enforcing impractical standards that disproportionately penalize local business owners, a more balanced and evidence-based approach should be taken to ensure both economic sustainability and responsible tourism management. 	
P11.EA1	Heather Brown (Abermaw Community Council)	Negative impact	Without good quality jobs in the area, the socially disadvantaged will not be able to afford housing under any circumstances. They will be better supported with provision of social housing that is not connected to this SPG.	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>
P12.EA1	Deborah Lumley	Negative impact	<i>[None noted]</i>	Note the response.

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				<u>Recommendation</u> – No change
P13.EA1	Alan Williams	Limited positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P14.EA1	Emyr Glyn Williams	Negative impact	Introducing this Supplementary Planning Guidance will bring more people into the categories of socioeconomically disadvantage, through loss of jobs and loss of income. Enforcing unrealistic criteria to measure the business viability of furnished holiday lets will have severe consequences, leading to financial instability for hardworking Welsh people who rely on this sector for their livelihood. By imposing impractical regulations, many small-scale holiday let owners who have invested significant time, effort, and resources will find their businesses deemed unviable, forcing them to shut down. This will result in widespread socio-economic disadvantage, including: <ul style="list-style-type: none"> • Loss of Income – Welsh families who depend on holiday lets as their primary or 	Note the response however no evidence has been provided which supports this representation. The SPG will not impact current holiday lets as the ability to use an established short-term let can continue (established pre implementation of the Article 4 Direction). It seems that the regulations which are referenced are beyond the control of the Planning system or the SPG specifically. <u>Recommendation</u> – No change

Ref number	Name	In your opinion, what will be the impact of introducing the Supplementary Planning Guidance on those who are socio-economically disadvantaged (for example, financial poverty, digital poverty, no easy access to services and events)?	Do you have any comments about your choice above, for example, are there any opportunities to adapt what is being proposed to have a more positive impact on those who are socio-economically disadvantaged, or to remove any negative effects.	Officers' response
			<p>supplementary income will face financial hardship.</p> <ul style="list-style-type: none"> • Increased Unemployment – Those working in maintenance, cleaning, and other hospitality services linked to holiday lets will lose jobs. • Economic Decline in Rural Areas – Communities that rely on tourism spend will see a downturn, affecting local shops, restaurants, and suppliers. • Housing Market Disruptions – Property devaluation and increased financial strain on homeowners who may struggle with mortgage repayments. • Social and Cultural Impact – The loss of a thriving tourism industry could diminish community vibrancy, with fewer visitors supporting local events and traditions. Rather than enforcing impractical standards that disproportionately penalize local business owners, a more balanced 	

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			and evidence-based approach should be taken to ensure both economic sustainability and responsible tourism management.	
P15.EA1	Gareth Lloyd	Negative impact	This is all a total waste of time and money and like Brexit it is brainwashing nonsense that will only be harmful in many ways, you are trying to change the demographics of a county and it is racist and harmful. Scrap all of it before it's too late.	Note the response but it does not appear to be related to the contents of the SPG or its impact on those who are socio-economically disadvantaged. <u>Recommendation</u> – No change
P16.EA1	Janine Dow		Introducing Supplementary Planning Guidance will bring more people into the categories of socio-economically disadvantage, through loss of jobs and loss of income. Enforcing unrealistic criteria to measure the business viability of furnished holiday lets will have severe consequences, leading to financial instability for hardworking Welsh people who rely on this sector for their livelihood. By imposing impractical regulations, many small-scale holiday let owners—who have invested significant time, effort, and resources—	Note the response however no evidence has been provided which supports this representation. The SPG will not impact current holiday lets as the ability to use an established short-term let can continue (established pre implementation of the Article 4 Direction). It seems that the regulations which are referenced are not hosed which are beyond the control of the Planning system or the SPG specifically. <u>Recommendation</u> – No change

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			<p>will find their businesses deemed unviable, forcing them to shut down. This will result in widespread socio-economic disadvantage, including:</p> <ul style="list-style-type: none"> • Loss of Income – Welsh families who depend on holiday lets as their primary or supplementary income will face financial hardship. • Increased Unemployment – Those working in maintenance, cleaning, and other hospitality services linked to holiday lets will lose jobs. • Economic Decline in Rural Areas – Communities that rely on tourism spend will see a downturn, affecting local shops, restaurants, and suppliers. • Housing Market Disruptions – Property devaluation and increased financial strain on homeowners who may struggle with mortgage repayments. • Social and Cultural Impact – The loss of a thriving tourism industry could diminish community vibrancy, with fewer visitors supporting local events and traditions. 	

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			Rather than enforcing impractical standards that disproportionately penalize local business owners, a more balanced and evidence-based approach should be taken to ensure both economic sustainability and responsible tourism management.	
P17.EA1	Dylan Bryn Roberts	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P18.EA1	Fiona Hampton-Matthews	Negative impact	Introducing Supplementary Planning Guidance will bring more people into the categories of socio-economically disadvantage, through loss of jobs and loss of income. Enforcing unrealistic criteria to measure the business viability of furnished holiday lets will have severe consequences, leading to financial instability for hardworking Welsh people who rely on this sector for their livelihood. By imposing impractical regulations, many small-scale holiday let owners—who have invested significant time, effort, and resources—	Note the response however no evidence has been provided which supports this representation. The SPG will not impact current holiday lets as the ability to use an established short-term let can continue (established pre implementation of the Article 4 Direction). It seems that the regulations which are referenced are beyond the control of the Planning system or the SPG specifically. <u>Recommendation</u> – No change

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			Rather than enforcing impractical standards that disproportionately penalize local business owners, a more balanced and evidence-based approach should be taken to ensure both economic sustainability and responsible tourism management.	
P19.EA1	Ben Spier	Negative impact	Loss of key hospitality jobs reliant on holiday let visitors. Decline in the area generally as a result. Risk of negative equity for those with high loan to value mortgages because of significant house value drops.	Note the response however not evidence has not been provided which support these statements. <u>Recommendation</u> – No change
P20.EA1	Alan Harper-Smith	Negative impact	Introducing Supplementary Planning Guidance will bring more people into the categories of socio economically disadvantage, through loss of jobs and loss of income. Enforcing unrealistic criteria to measure the business viability of furnished holiday lets will have severe consequences, leading to financial instability for hardworking Welsh people who rely on this sector for their livelihood. By imposing	Note the response however no evidence has been provided which supports this representation. The SPG will not impact current holiday lets as the ability to use an established short-term let can continue (established pre implementation of the Article 4 Direction). It seems that the regulations which are referenced are beyond the control of the Planning system or the SPG specifically. <u>Recommendation</u> – No change

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			<p>impractical regulations, many small-scale holiday let owners— who have invested significant time, effort, and resources— will find their businesses deemed unviable, forcing them to shut down. This will result in widespread socio-economic disadvantage, including:</p> <ul style="list-style-type: none"> • Loss of Income – Welsh families who depend on holiday lets as their primary or supplementary income will face financial hardship. • Increased Unemployment – Those working in maintenance, cleaning, and other hospitality services linked to holiday lets will lose jobs. • Economic Decline in Rural Areas – Communities that rely on tourism spend will see a downturn, affecting local shops, restaurants, and suppliers. 	
P21.EA1	Goronwy Owen	Neutral	<i>[None noted]</i>	<p>Note the response.</p> <p><u>Recommendation</u> – No change</p>

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P22.EA1	Arfon Hughes	Positive impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change
P23.EA1	Nicola Williams	Negative impact	<i>[None noted]</i>	Note the response. <u>Recommendation</u> – No change