

ERYRI NATIONAL PARK AUTHORITY



CONSULTATION REPORT: SUPPLEMENTARY PLANNING GUIDANCE:

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

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1 BACKGROUND

The Policy Context

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

The need for a Supplement Planning Guidance

- 1.3 Since the adoption of the ELPD in 2019, there have been changes to national planning policy legislation and policy. 2022 saw the introduction of new Use Classes (C3, C5 and C6) and General Permitted Development Rights to move between the use classes. Changes to national planning policy (PPW Edition 12) provided guidance on introducing an Article 4 Direction to remove these permitted development rights.
- 1.4 The Authority has implemented an Article 4 Direction to remove some of the permitted development rights to move between the use classes. This came into effect on the 1st of June 2025, following a 12 month Notice period and a public consultation.
- 1.5 The ELDP pre-dates these changes. With the introduction of the new use classes and the Article 4 Direction, a Supplementary Planning Guidance is required to provide further guidance on how to apply Eryri Local Development Plan policies when considering planning applications for the Change of use of Main home, Second home and Short-Term holiday accommodation. This will assist those determining applications, Agents and Members of the Public on Visitor Accommodation developments within the Eryri National Park.
- 1.6 The guidance note will be one of a series of Supplementary Planning Guidance (SPG) documents which provides further detailed information on how policies contained in the Eryri Local Development Plan (ELDP) (2016-2031) will be applied in practice by the National Park Authority. The SPG will be a material planning consideration when decisions are made on planning applications related to change of use of Main Home, Secondary Home and Short Term let accommodation.
- 1.7 The SPG contains 10 sections. Sections 1-3 encompass guidance relating to the context of the Article 4 Direction, such as the following;
 - National planning legislation;
 - National and local planning policies and strategies;
 - The scope of the Article 4 Direction;
 - Defining the use classes and material changes of use.

- 1.8 Sections 4-10 gives specific guidance relating to planning applications for changes of use between the new use classes. It elaborates how the objectives of the ELDP policies will be applied to ensure appropriate developments within a National Park context. It also provides guidance on planning conditions for new build housing and conversions, keeping records of the use and compliance. It also states how second homes and short term lets data will be collated and published.

2 PUBLIC CONSULTATION

- 2.1 A draft version of this SPG was approved for public consultation by the Authority's Planning and Access Committee on January 22nd 2025.
- 2.2 The approved draft of this SPG was the subject of a 6 week public consultation between the 3rd of March and the 14th of April 2025.
- 2.3 A Welsh Language Impact Assessment was also prepared and published as part of the public consultation, with a question on the impacts on the Welsh language included on the consultation form.
- 2.4 Details of the public consultation were available on the Authority's website, and emails were sent to all Councillors, Community Councils, and those on the Authority's Contact Database. Hard copies of the SPG were also available to view:
- at the National Park Office in Penrhyndeudraeth,
 - at public libraries and the Authority's Information Centres.
- 2.5 Interested parties were informed to respond to the consultation through submitting comments by using an online form, or emailing polisi.cynllunio@eryri.llyw.cymru
- 2.6 A total of 24 representations were received, resulting in 38 comments. Several comments were in support or opposition to the impacts and principle of the Article 4 Direction itself. Comments on the adoption of an Article 4 Direction were considered during the consultation period for the Article 4 Direction, which was held during April - May 2024. The Authority respond to representations received during this consultation period in the Consultation Report, which was presented to the Authority's Planning and Access Committee on January 22nd 2025.

Not all comments received were on the contents of the SPG. These comments were in support or objection to the principle of the Article 4 Direction itself, which has been the subject of a previous consultation, and has been formally confirmed by the Authority. However, a response has been provided to all matters raised. A number of changes are made by officers to provide more clarity on the policy position and further guidance on the implementation of the Article 4 Direction.

- 2.7 Appendix 1 of this report, summarises the comments received, the Authority's response to the comments and, where appropriate, recommends any changes required to the SPG in lieu of the comment.
- 2.8 Appendix 2 of this report, is the officer's response to the comments relating to the use of a 15% threshold within the SPG.

Appendices

APPENDIX 1: Summary of comments received and officer responses

APPENDIX 2: Officer response on the use of a 15% a threshold

Resp ID	Rep ID	Name	Organisation	Para No.	Representation	Officer summary	Officer response	Changes proposed
001	001	Elaine Weston			I think this is a fair way to deal with the problem.	Agreement with the SPG	Noted	No changes proposed
002	001	David Williams			<p>As an owner of a hospitality business (guest house) I welcome the Authority's intention to restrict the further proliferation of holiday lets in the area. However, this does not address the mischief which has been caused, and continues to be caused, by existing holiday lets. As a resident, business operator and Welsh speaker, I am deeply concerned by the damage being done to our local communities by holiday lets. It is my considered view based on my experience in Aberdyfi, that it is holiday lets rather than second homes which pose the greatest threat to the sustainability of our communities and the ongoing survival of Cymraeg as a living language in daily use. The holiday letting regime and its unjustifiably favourable tax treatment has resulted in a massive proliferation of second homes in our communities. In reality, I believe that the primary purpose of the vast majority of holiday lets is actually to be a second home for the owner; the use of the property as a "holiday let" is primarily a means for the owner to fund the property (typically through buy to holiday let mortgages) and to avoid paying council tax. Holiday letting has extended the viability and affordability of a second home to a vastly larger group of owners. Furthermore, the recent 182 night per annum requirement has resulted in perverse behaviours by holiday let owners who are massively discounting their rates (frequently to loss-making levels) in order to drive volume: this is negatively affecting genuine, local accommodation providers who cannot compete with these low rates, it is also resulting in a significant change in the demographic of tourists (especially during off-peak periods) resulting in an influx of disrespectful visitors who are simply looking for a cheap break.</p> <p>I strongly urge the Authority to consider controls requiring that all owners of residential properties should have to apply for planning permission to operate as a holiday let. This should apply to existing holiday lets and should require the owners to show a clear benefit to the community of their business. Whilst the new controls will resist new holiday lets, it will do nothing to address the damage that has already been caused nor to prevent the worsening of that damage as holiday let owners flood the market with cheap accommodation in an effort to continue to avoid paying council tax. If nothing is done to address this situation, many local accommodation providers will not survive and we will see further damage from an influx of disrespectful visitors seeking cheap holidays.</p>	Holiday lets harmful to communities, more so than second homes. Holiday letting used to fund use as second home by the owner and to avoid council tax premium. Drive by operators to let for the required 182 days for business rates relief with discounted rates is damaging to other accommodation providers. Urges the Authority to apply controls to all existing dwellings used as holiday lets, and they must show clear benefit to the community.	<p>The aim of implementing an Article 4 Direction is to protect the communities of Eryri and to ensure that opportunities exist for people to be able to live in their communities. An Article 4 Direction will help protect the existing housing stock from further deterioration by managing their use, along with other interventions.</p> <p>The impact upon communities and existing serviced accommodation is noted. An over-provision of holiday accommodation can be damaging to the tourism sector, and it could mean that businesses that have followed specific founding arrangements, for example obtaining planning permission and registering with Visit Wales, are failing because of the excess provision. This over-provision is exacerbated by private accommodation that is let on an ad hoc basis with no control through marketing platforms. The data shows that the over provision of non-serviced accommodation may result in lower bookings for some providers and a lower income (see Article 4 Direction Consultation Report for further details). A lack of current control over the use means that it is not possible to manage the use, meaning that genuine businesses are failing. By contrast, the Directi</p> <p>on would allow control to be exercised so as to manage the supply of second homes/short-term lets so as to better balance supply and demand/need.</p> <p>Using an Article 4 Direction is the only method that can trigger the need for planning permission for a material change of use of a main residence to a second home or holiday let. This is done via removing existing permitted development rights to move between the Use Classes. The Article 4 Direction required advanced notice and must follow procedures set in legislation. It is not legally possible to apply the need for planning permission retrospectively for existing short term holiday accommodation.</p>	No changes proposed.
003	001	Owen Thomas		4	I think that high taxes are enough and there is no need for paragraph 4.	High taxes are a sufficient measure.	The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to affordable housing. The three-pronged approach	No changes proposed

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							<p>focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our communities. <p>The Article 4 Direction is a regulatory change who's purpose is to manage second homes and short-term holiday accommodation. Providing new affordable homes is a function of Eryri NPA, Cyngor Gwynedd and Conwy Council and Housing Associations. Changes to the tax system is implemented by the two local authorities. It is considered that the Article 4 Direction is required as part of a range of measures to address the housing requirements of Eryri. An Article 4 Direction will help protect the existing housing stock from further deterioration by managing their use, along with other interventions. The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities. Holiday homes play an important role in supporting the local tourist industry. This guidance seeks to strike a balance between the benefits of tourism and the housing needs of communities.</p>	
004	001	Gareth Owen			Best thing ever to reduce the amount of second homes, gives chance for local people to buy and add to the community.	Agreement with the Article 4 Direction, being beneficial for young people wishing to buy homes and stay within their communities.	Noted. The aim of implementing an Article 4 Direction is to protect the communities of Eryri and to ensure that opportunities exist for people to be able to live in their communities. An Article 4 Direction will help protect the existing housing stock from further deterioration by managing their use, along with other interventions.	No changes proposed.
005	001	Ian Parri			The nature and character of the Park depends on its people, and is gradually being destroyed as the population cannot find homes in their communities. This Guidance is an important first step to change that, and should be approved	Supportive of the SPG.	Support for the SPG is noted.	No changes proposed.
006	001	Jeremy Davies			Whilst I believe tourism needs to be managed, I fear article 4 will only attract a greater number of people into an area where there is no alternative employment and where public services are already at breaking point.	The Article 4 Direction will only attract a greater number of people into an area where there is no alternative employment and where public services are already at breaking point.	<p>The purpose of the Article 4 Direction is to gain better management of Eryri's Local Planning Area housing stock, prevent any further reduction in housing available to local communities and to ensure that the amenities of the residents are protected, to protect and maintain communities that offer opportunities for people to live and work in them.</p> <p>In terms of impact upon public services, the impact was considered in the Article 4 Direction Consultation Report. Representation 022 001 by the NHS to this consultation also states that high levels of homes used as temporary accommodation, such as holiday</p>	No changes proposed.

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							<p>lets, have increased the pressures on local health services.</p> <p>In terms of employment, the tourism sector is diverse, consisting of several accommodation and visitor types. A rise in jobs related to non-serviced accommodation has also seen a reduction in jobs related to serviced accommodation (see Article 4 Direction Consultation Report for further details). The data suggests that the continual increasing supply of non-serviced accommodation does not yield corresponding increases in full time employment tourism jobs. The data shows that the number of beds available in serviced accommodation has reduced over this time period. It would appear that tourists are increasingly favouring non-serviced accommodation for their stays in Eryri, which has a detrimental effect on serviced accommodation such as hotels, which traditionally supports more jobs.</p> <p>The representation does not comment on the content of the SPG.</p>	
007	001	Ruth Foulkes			<p>I do not agree with the changes. I do not agree with article 4 or the increased council tax for holiday homes. The LA has failed in its duty to provide social and affordable housing for the citizens of Gwynedd. The LA is using simplistic measures to try and rectify their lack of planning. I am Welsh. Living in my primary residence & my house has been devalued by the A4 & CT changes because it has put people off buying houses in Gwynedd. It is scary that the LA can make changes like this to my biggest asset. It is also annoying that it will not solve the problem they want. It is not the answer to local people buying houses. If the LA want local people to have houses they should buy properties themselves at a decent price and then rent or sell them to locals. BTW I am now a local. I also do not appreciate Snowdonia national park buddying up with Gwynedd LA in this venture.</p>	<p>Does not agree with the Article 4 Direction. There has been a failure to provide social and affordable housing. Local Authority should buy houses and rent them to locals. House prices have been devalued.</p>	<p>The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to affordable housing. The three-pronged approach focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our communities. <p>The first approach is responding to affordability and availability of housing. Both Gwynedd and Conwy Local Housing Market Assessments conclude that there is a need for more affordable housing in both counties and that the current supply is unable to meet the growing demand. Providing more affordable housing through the development of new houses is one way of meeting this need as it is possible to use planning obligations to ensure that a proposal</p>	No changes proposed.

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							<p>addresses local affordable need. Eryri National Park Authority is committed to delivering affordable housing to meet local need and the Eryri Local Development Plan includes policies to enable the delivery of new local affordable homes. However, the approach of building more houses as the only solution to respond to the housing crisis and meeting local needs is unrealistic from a delivery perspective and unsustainable from a social and environmental perspective. Environmentally acceptable sites are limited in Eryri due to environmental designations, the risk of flooding and due to topographical issues, therefore it must be recognised that land use planning is only one of the mechanisms that can be used to provide local affordable housing. The aim of implementing an Article 4 Direction is to protect the communities of Eryri and to ensure that opportunities exist for people to be able to live in their communities. An Article 4 Direction will help protect the existing housing stock from further deterioration by managing their use, along with other interventions.</p> <p>Gwynedd Council's Housing Action plan has given a high priority on provision of affordable housing and housing is to be built under the Tai Gwynedd scheme. The Council are purchasing dwellings to provide homes for intermediate rent (Eryri National Park is contributing financially to this scheme using affordable housing financial contributions). Housing Associations continue to build new social and intermediate housing.</p> <p>On the impact upon house prices, the response to this matter in the Consultation Report for the Article 4 Direction, concludes that the impact of the Article 4 Direction on house prices is difficult to quantify, as there are many factors that will influence house price value. If house prices rise or fall, it is often due to several factors, and it is difficult to attribute how much a single factor has contributed to a change. Research shows that the use of a primary residency condition by other local authorities and national parks has not resulted in any significant reduction in house prices.</p> <p>The representation does not comment on the content of the SPG.</p>	
008	001	Peter Mooney			A complete waste of time and money. Extremist views that do no to help the area	Objection to the Direction	<p>The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to</p>	No changes proposed.

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							<p>affordable housing. The three-pronged approach focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our communities. <p>The Authority has determined to implement the Article 4 Direction based on the evidence that is presented in the Justification Report, and following a public consultation. Along with other measures being taken, the Article 4 Direction is required to gain better management of Eryri's Local Planning Area housing stock, prevent any further reduction in housing available to local communities.</p> <p>The representation does not comment on the content of the SPG.</p>	
009	001	Si Har			Waste of time. Won't achieve objectives specified	Objection to the Direction	<p>The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to affordable housing. The three-pronged approach focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our communities. <p>The Authority has determined to implement the Article 4 Direction based on the evidence that is presented in the Justification Report, and following a public consultation. Along with other measures being taken, the Article 4 Direction is required to gain better management of Eryri's Local Planning Area housing stock, prevent any further reduction in housing available to local communities.</p>	No changes proposed.

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							<p>In terms of meeting objectives, the impact of the Direction will be monitored closely. Policy can respond to unexpected impacts. The review of the Local Development Plan will also involve forming new policies to encompass the new use classes and the Article 4 Direction, into which the results of monitoring will be fed.</p> <p>The representation does not comment on the content of the SPG.</p>	
010	001	Rhys Llywelyn			Needs to be introduced as soon as possible and give neighbours the right to comment on applications.	Supportive of the right of neighbours to provide comments on planning applications.	The SPG will provide guidance for members of the community who wish to comment on planning applications for the changes of use that are required by the Direction.	No changes proposed.
011	001	Osian Mann			It's absolutely ridiculous that an area that depends hugely on tourism to survive and thrive decides that it's a good idea to cut the life blood that actually provides jobs and the main source of income to Eryri. This is SO wrong on many factors and being a Welsh speaker myself find it insulting that you're using MY language as an excuse to bring in this crazy ruling - Plaid have lost my vote of 50+ years.	Objection to the Direction - area depends on tourism.	<p>It is important to emphasise that the Article 4 Direction would not be retrospective, meaning that existing short term accommodation unit could continue the use, meaning associated work for gardener, cleaners, builders will remain. In areas where there are significant numbers of short-term holiday lets, they will continue to contribute to local prosperity. It is difficult to predict how many short-term units will transfer to permanent residences in the future. This would need to be balanced against any short-term holiday lets granted permission, dependent on planning policy and individual merits of the applications.</p> <p>The tourism sector is diverse, consisting of several accommodation and visitor types, and does not solely rely on non-serviced accommodation. A rise in jobs related to non-serviced accommodation has seen a reduction in jobs related to serviced accommodation (see Article 4 Direction Consultation Report for further details). The data suggests that the continual increasing supply of non-serviced accommodation does not yield corresponding increases in full time tourism jobs. The data shows that the number of beds available in serviced accommodation has reduced over this time period. It would appear that tourists are increasingly favouring non-serviced accommodation for their stays in Eryri, which has a detrimental effect on serviced accommodation such as hotels, which traditionally supports more jobs.</p> <p>The representation does not comment on the content of the SPG.</p>	No changes proposed.
012	001	Medi Jones			Ridiculous and will destroy the Welsh way of life	Objection to the Direction	Creating sustainable communities where the Welsh language has been completely immersed within communities and providing the social context necessary to use the Welsh language as part of society's normal use is essential in order to protect and encourage the growth of the Welsh language. Over the years we have seen a reduction in the housing stock available for the local population. A shortfall in the supply of available housing can lead	No changes proposed.

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							<p>to higher house prices, resulting in the local population being priced out of the housing market. It is hoped that implementing the Article 4 Direction will protect the housing stock from further deterioration and ensure that housing in Eryri is used as main residence for the local population. It is considered important for the prosperity of the Welsh language that there is a stable population within our communities, to use the services, facilities and keep the schools open.</p> <p>The representation does not comment on the content of the SPG.</p>	
013	001	Ceri Owen			<p>Could you provide any explanation as to why you believe you have the right to dictate what I can do with a house I own and have lived in for almost 30 years? When I leave this house to my children they technically become second home owners? Why should they be forced into selling a property myself and my husband have worked hard all of our lives for?</p> <p>Have you given any consideration whatsoever to the effect this ridiculous policy will have on the Welsh economy? I doubt it.</p> <p>I despair of this country under the current government.</p>	Objection to the Direction; concerns on inheritance and impact on economy.	<p>If an individual inherits a residential house that was used as a main residence, the use of the property for this purpose will continue following the implementation of the Article 4 Direction without the need to receive planning consent. For example, the person who has inherited the property could decide to occupy the property as their main home, rent it out on a long-term basis for a household to use as their main home, or sell it for that purpose. Similarly, if the most recent use of the inherited property was as holiday accommodation or second home then those uses may continue following implementing the prospective Article 4 Direction.</p> <p>The Authority agrees on the importance of economic growth and the need to create jobs. The third statutory National Park purpose is that the Authority has a duty to foster the economic and social wellbeing of local communities within the National Park. The Eryri Local Development Plan 2016-2031 (ELDP) objectives include encouraging sustainable economic growth by supporting a rural economy that provides employment opportunities and maintains thriving communities, and, supporting tourism and outdoor recreation which maximise local economic benefits, minimise environmental impact and are in sympathy with the 'Special Qualities' of the National Park.</p> <p>It is important to emphasise that the Article 4 Direction would not be retrospective, meaning that existing short term accommodation unit could continue the use, meaning associated work for gardener, cleaners, builders will remain. In areas where there are significant numbers of short-term holiday lets, they will continue to contribute to local prosperity. It is difficult to predict how many short term units will transfer to permanent residences in the future. This would need to be balanced against any short-term holiday lets granted permission, dependent on planning policy and individual merits of the applications.</p> <p>The seasonal nature of short term lets results in reduced support for local business and services off</p>	No changes proposed.

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							<p>season. Reduced availability and affordability of housing also makes it more difficult for those working in the sector to find suitable accommodation. This situation is further impacted by the seasonality of tourism, even more acute in places where the main tourist season may only span the spring and summer economy.</p> <p>In terms of employment, the tourism sector is diverse, consisting of several accommodation and visitor types. A rise in jobs related to non-serviced accommodation has also seen a reduction in jobs related to serviced accommodation (see Article 4 Direction Consultation Report for further details). The data suggests that the continual increasing supply of non-serviced accommodation does not yield corresponding increases in FTE tourism jobs. The data shows that the number of beds available in serviced accommodation has reduced over this time period. It would appear that tourists are increasingly favouring non-serviced accommodation for their stays in Eryri, which has a detrimental effect on serviced accommodation such as hotels, which traditionally supports more jobs.</p> <p>Comments relating to the principle of the Article 4 Direction were considered during the public consultation for the Direction, held during April-May 2024, and a response is found in the Consultation Report. The Authority determined to confirm the implementation of the Article 4 Direction, after considering the representations received during the consultation process.</p>	
014	001	Carol Richardson			<p>Reading the document it states the overall % of second homes and holiday lets is 17% which in this area I would judge to be manageable. On review of the individual areas only a few would seem to be high and problematic. However, areas with around 20% are also lacking in social housing and using a hammer to crack a nut is not going to solve the issue. On review of properties on the market currently the majority are at prices well above what locals on minimum wage will ever afford. This being if all reduce to £100k! On review it seems that properties are selling in the higher vales to people from England moving out from possibly high immigrant agree etc. it seems this strategy may have the effect to gentrify the area whilst small properties languish unsold. This strategy will greatly impact upon residents and their employment opportunities as currently second homes and holiday lets provide much employment and where is any other source of employment? This change will have the impact upon many business and trades people as they service second homes and holiday lets. Many Welsh people also own such properties as they will be impacted upon. Possibly moving away alongside the unemployed workforce thus loos in Welsh speakers and impacting negatively on the Welsh language.</p>	<p>Percentage of second homes and holiday lets of 17% is manageable. Areas above 20% are lacking social housing. Houses on the market are above what locals on minimum wage can afford. People from England buying houses. Negative impact on employment and economy. Welsh speakers will be impacted and move away, impacting negatively on the language.</p> <p>Since A4 has been introduced in Gwynedd house prices have clearly reduced. Sales in some of the less desirable areas have possibly slowed down; however, in popular tourist locations, the</p>	<p>Appendix B of the Consultation Report states the reasons for using a 15% threshold.</p> <p>The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to affordable housing. The three-pronged approach focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our 	No changes proposed.

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						<p>lower prices have attracted people wishing to retire in the area. This is positive as it has prevented another home from becoming a 2nd home or short-term holiday property; however, it does have an impact on the language, unless the community is working hard to encourage people to learn Welsh.</p>	<p>communities.</p> <p>The first approach is responding to affordability and availability of housing. Both Gwynedd and Conwy Local Housing Market Assessments conclude that there is a need for more affordable housing in both counties and that the current supply is unable to meet the growing demand. Providing more affordable housing through the development of new houses is one way of meeting this need as it is possible to use planning obligations to ensure that a proposal addresses local affordable need. Eryri National Park Authority is committed to delivering affordable housing to meet local need and the Eryri Local Development Plan includes policies to enable the delivery of new local affordable homes. However, the approach of building more houses as the only solution to respond to the housing crisis and meeting local needs is unrealistic from a delivery perspective and unsustainable from a social and environmental perspective. Environmentally acceptable sites are limited in Eryri due to environmental designations, the risk of flooding and due to topographical issues, therefore it must be recognised that land use planning is only one of the mechanisms that can be used to provide local affordable housing. The aim of implementing an Article 4 Direction is to protect the communities of Eryri and to ensure that opportunities exist for people to be able to live in their communities. An Article 4 Direction will help protect the existing housing stock from further deterioration by managing their use, along with other interventions.</p> <p>Gwynedd Council's Housing Action plan has given a high priority on provision of affordable housing and housing is to be built under the Tai Gwynedd scheme. The Council are purchasing dwellings to provide homes for intermediate rent (Eryri National Park is contributing financially to this scheme using affordable housing financial contributions). Housing Associations continue to build new social and intermediate housing.</p> <p>On the impact upon house prices, the response to this matter in the Consultation Report for the Article 4 Direction, concludes that the impact of the Article 4 Direction on house prices is difficult to quantify, as there are many factors that will influence house price value. If house prices rise or fall, it is often due to several factors, and it is difficult to attribute how much a single factor has contributed to a change. Research shows that the use of a primary residency condition by other local authorities and national parks has not resulted in any significant reduction in house prices. Impacts on house prices.</p> <p>In terms of employment, the tourism sector is</p>	

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							<p>diverse, consisting of several accommodation and visitor types. A rise in jobs related to non-serviced accommodation has also seen a reduction in jobs related to serviced accommodation (see Article 4 Direction Consultation Report for further details). The data suggests that the continual increasing supply of non-serviced accommodation does not yield corresponding increases in FTE tourism jobs. The data shows that the number of beds available in serviced accommodation has reduced over this time period. It would appear that tourists are increasingly favouring non-serviced accommodation for their stays in Eryri, which has a detrimental effect on serviced accommodation such as hotels, which traditionally supports more jobs.</p> <p>The seasonal nature of short term lets results in reduced support for local business and services off season. Reduced availability and affordability of housing also makes it more difficult for those working in the sector to find suitable accommodation. This situation is further impacted by the seasonality of tourism, even more acute in places where the main tourist season may only span the spring and summer economy.</p> <p>In terms of Economic Development, the Authority works closely with the two Local Authority Economic Sections. Eryri NPA and Gwynedd Council produced The Gwynedd and Eryri Sustainable Visitor Economy Plan 2035, which is a groundbreaking new strategy that introduces a totally different approach to measuring the impact of tourism in Gwynedd and Eryri.</p> <p>Creating sustainable communities where the Welsh language has been completely immersed within communities and providing the social context necessary to use the Welsh language as part of society's normal use is essential in order to protect and encourage the growth of the Welsh language. Over the years we have seen a reduction in the housing stock available for the local population. A shortfall in the supply of available housing can lead to higher house prices, resulting in the local population being priced out of the housing market. It is hoped that implementing the Article 4 Direction will protect the housing stock from further deterioration and ensure that housing in Eryri is used as main residence for the local population. It is considered important for the prosperity of the Welsh language that there is a stable population within our communities, to use the services, facilities and keep the schools open. The importance of conserving the National Park's Special Qualities is also an important focus of the work of the National Park Authority, Cynllun Eryri and the Eryri Local Development Plan. Introducing an Article 4 to manage the number of second homes and holiday accommodation will</p>	

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							contribute towards conserving and enhance “the robust sense of community cohesion, belonging and vibrancy which combine to give a strong ‘sense of place’” as well as “the continuing vibrancy of the Welsh language as the primary language in social and professional environments”.	
015	001	Lynn Mitchell			<p>Not allowing the area to organically change will be at the detriment of the Welsh economy and prosperity of its citizens. Quotas per settlement would be a more simple and less complicated method of dealing with excessive holiday homes however essentially the area should embrace visitors make them welcome and benefit from their spend. Many of the houses that are renovated and upgraded at considerable investment into Welsh heritage would not be suitable or viable for those you are suggesting are being pushed out of communities and we must consider that it is very likely a local family decided to sell their property at some stage which was then purchased and heavily invested in improving the aesthetic of the area. The overly bureaucratic and anti tourist/ developer/ investor approach is one way to suppress the local economy and earning potential for the very people you are suggesting you are trying to save.</p> <p>Wales has the opportunity to improve its citizens job and economic prospects reaching out to those who choose to invest in this beautiful country.</p>	<p>Objection to the Direction due to it being to the detriment of the economy and prosperity of its citizens; areas should embrace visitors.</p> <p>Houses renovated and updated not suitable for those pushed out of communities.</p>	<p>It is agreed that the SPG should acknowledge the contribution of the visitor economy, and second homes and short-term holiday lets to the economy. As a National Park, it must also be ensured that the area and its special qualities are protected and safeguarded. The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities.</p> <p>The ability to purchase a home and renovate it is not solely limited to those wishing to use a dwelling as a second home or holiday let. The Article 4 Direction is targeting all homes, due to the cumulate impact of the number of homes that are not used as permanent dwellings and are left empty for significant parts of the year. LDP policies seek to safeguard the social well-being of local communities, as those occupants living permanently in the area are more likely to utilise and support a broader range of local services.</p>	<p>Paragraph added to section 2:</p> <p>The importance of the visitor economy to this special area is recognised, but it must also be ensured that the area and its special qualities are protected and safeguarded - so that what is so unique about the area remains protected today and for future generations. Through tourism it is possible to achieve one of the statutory purposes of the National Park; that is to promote opportunities for the understanding and enjoyment of the ‘Special Qualities’ of the National Park. The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities. Holiday homes play an important role in supporting the local tourist industry. This guidance seeks to strike a balance between the benefits of tourism, and the housing needs of communities.</p>

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016	001	Dylan Bryn Roberts	Dyfodol i'r laith		We welcome the fact that APCE wishes to adopt Article 4 SPG from June 2025 onwards and has set a threshold of 15% of second homes, holiday homes in its communities.	Supports adoption of the SPG and a 15% threshold, which will result in better management of holiday accommodation in communities.	Noted	No changes proposed.
017	001	Robin Ward			The proposed limit of 15% is arbitrary. Any new application should be considered on its own merit regardless of historical uses in the neighbourhood as this makes the policy highly unfair and discriminatory. .	15% threshold is arbitrary, and applications should be considered on their individual merits.	Appendix B of the Consultation Report contains the officer response to comments on the use of a 15% threshold. This refers to research on thresholds used by other authorities and reports. The impact of a second home or short-term holiday let is cumulative, and can have a range of impacts, from housing availability, community cohesion, services and infrastructure. Determining a planning application based solely on individual merits would not take into account these factors, which are relevant material considerations and policy requirements.	No changes proposed.
017	002	Robin Ward		4	Existing C5 and C6 users do not need planning permission to retain their use which again is unfair and discriminatory especially against anyone (particularly the elderly) wishing to downsize in later life. Such residents are more likely to have larger properties to sell which are not targeted at local first time buyers. Guidance on granting permission for change of use should reflect the property value, the local affordability and the market conditions. For example it could be argued that if a larger property (or indeed any property) has not sold at market rates within 12 months then the section 4 condition would be deemed to be waived.	Unfair to those wishing to sell their C3 but unable to do so as C5/C6. Guidance on granting permission for change of use should reflect the property value, the local affordability and the market conditions. For example, it could be argued that if a larger property (or indeed any property) has not sold at market rates within 12 months then the section 4 condition would be deemed to be waived.	If an individual inherits a residential house that was used as a main residence, the use of the property for this purpose will continue following the implementation of the Article 4 Direction without the need to receive planning consent. For example, the person who has inherited the property could decide to occupy the property as their main home, rent it out on a long-term basis for a household to use as their main home, or sell it for that purpose. Similarly, if the most recent use of the inherited property was as holiday accommodation or second home then those uses may continue following implementing the prospective Article 4 Direction. Difficulties in selling properties can be due to many reasons, such as location, condition of the building, structural issues, infrastructure, state of the housing market and mortgages etc. Houses are often on sale for long periods, and the lack of sale over 12 months would not necessarily be due to the Article 4 Direction and would be difficult to attribute to this reason alone. Large houses which have a C3 use will require planning permission to change to C5/C6. The use as a C3 main residence can continue by any new purchaser, it will not be targeted at local first-time buyers, there is no restriction on who can buy or live in a main home. On the impact upon house prices, the response to this matter in the Consultation Report for the Article 4 Direction, concludes that the impact of the Article 4 Direction on house prices is difficult to quantify, as there are many factors that will influence house price value. If house prices rise or fall, it is often due to several factors, and it is difficult to attribute how much a single factor has contributed to a change. Research shows that the use of a primary residency condition by other local authorities and national parks has not resulted in any significant reduction in house prices.	No changes proposed.

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018	001	James Harlan	Conwy County Borough Council		CCBC support the principle of Eryri National Park's implementing an article 4 Direction, including this accompanying SPG and the policy approach proposed. The approach could contribute positively towards Conwy's Corporate Plan outcome for housing. Regarding the proposed thresholds, CCBC officers agree with the 15% detailed in the SPG.	Supportive of policy approach of the SPG. Concerns with potential displacement to communities outside the National Park area. A need to monitor these areas for potential impact. Agreement with the 15% threshold. Close working will need to continue between CCBC Strategic Planning Policy Service and Eryri planning policy team to ensure that there is a consistent approach for the 'shared' settlements through Conwy's emerging Replacement LDP.	Noted and agreed. Eryri NPA will continue to work closely with CCBC to ensure consistent approach and monitoring	No changes proposed.
018	002	James Harlan	Conwy County Borough Council		CCBC have concerns with potential displacement to other CCBC communities, which are not part of the National Park. We will monitor these areas for potential impact. Close working will need to continue between CCBC Strategic Planning Policy Service and Eryri planning policy team to ensure that there is a consistent approach for the 'shared' settlements through Conwy's emerging Replacement LDP.	Concerns over displacement to areas outside the National Park area. A need to work closely with Eryri NPA.	The National Park boundary does not follow all community council boundaries, meaning that some are only partly within the Park. When considering a planning application, the percentage of second homes and short-term holiday lets for the whole community council area is considered, including those which are only partly within the boundary. This allows for the wider community area to be considered and allows cross boundary consideration. It is agreed that close monitoring will be required. Eryri officers have been working closely with CCBC policy section and will continue to do so in terms of monitoring and forming relevant policies for the LDP review.	No changes proposed.
018	003	James Harlan	Conwy County Borough Council		CCBC Local Taxation Team would appreciate early engagement regarding data requirements to support the planning application process. It can be time consuming to provide this data and will need to be resourced from existing staffing and capacity.	No changes proposed.	Agreed. Officers will continue to discuss data requirements with CCBC Rates section.	No changes proposed.
019	001	Richard Proctor		2.24	2.24 Change of use from holiday let (C6) to second home (C5) The proposal states that planning permission will be required to change from holiday let (C6) to second home (C5). This should not be the case, as the impact on the supply of main home (C3) housing stock (and consequently the % proportionality of housing stock) is not affected by this change and the impact on infrastructure is lower than holiday let. There is no reason for this change to require planning	Disagrees with the need for a change of use between C5 and C6.	The requirement for planning permission to change from C6 to C5 is included in the Article 4 Direction. The SPG does not provide criteria for proposal of this nature, stating that it will be considered on a case-by-case basis, against the relevant policies of the local development plan and all other material considerations. It will make it possible for detailed policies to be formed for future Local Development	No changes proposed.

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					<p>permission.</p> <p>My uncle renovated / built our house 35 years ago and he left it to my sister and I when he passed away. We are Welsh and have been visiting the area for the last 30 years and want to keep doing so with our own families. We have spent a significant amount of money to repair and maintain it. We operate it as a holiday let to help fund the upkeep and pay the council tax. We employ companies locally to undertake the cleaning and maintenance and supply goods. If we find ourselves in a position where we can no longer operate the holiday let, owing to commercial viability, time availability, stress or because we can't find anybody to clean and maintain it, we should not have to get planning permission to return it to a second home. If permission to return to second home is declined, we will be faced with a decision whether to continue to operate a holiday let, something that might not be possible, or to sell the house that my uncle built and we have invested significantly in. This is not right.</p> <p>I request for the requirement for change of use from holiday let (C6) to second home (C5) to be removed.</p>		Plans, which takes into account both use classes, in terms of the nature of their use, and the numbers that are found within communities.	
020	001	John Reynolds		2.6	Spelling error sec 2.6 "Chanes" should be "Changes"	Spelling error	Noted	Spelling error corrected
020	002	John Reynolds			<p>The document describes how the Use Categories will be applied but there is no reference to how SNP and GCC will increase the stock of affordable houses and what is being done to create career opportunities to enable people to earn enough to qualify for mortgages. I appreciate that is not the role of this document but are these issues being addressed elsewhere</p>	<p>No reference to how Eryri and Gwynedd Council will increase the stock of affordable houses and what is being done to create career opportunities to enable people to earn enough to qualify for mortgages</p>	<p>The Authority recognises that a range of measures and solutions are required to ensure the residents of Eryri have access to suitable affordable homes. Welsh Government have made a number of measures available to Local Authorities to address the second homes and holiday accommodation crisis. On 6 July 2021, the Welsh Government announced a three-pronged approach to address the impact of second homes on communities in Wales, to ensure that the people of Wales have access to affordable housing. The three-pronged approach focuses on:</p> <ul style="list-style-type: none"> • Supporting and responding to affordability and availability of housing • Regulatory framework and system - in relation to the Planning act and the introduction of a statutory registration scheme for short-term holiday accommodation, and • A fairer contribution - using national and local taxation systems to ensure second home owners make a fair and effective contribution to our communities. <p>The first approach is responding to affordability and availability of housing. Both Gwynedd and Conwy Local Housing Market Assessments conclude that there is a need for more affordable housing in both counties and that the current supply is unable to meet the growing demand. Providing more affordable housing through the development of new houses is one way of meeting this need as it is possible to use planning obligations to ensure that a proposal addresses local affordable need. Eryri National Park Authority is committed to delivering affordable</p>	No changes proposed.

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							<p>housing to meet local need and the Eryri Local Development Plan includes policies to enable the delivery of new local affordable homes. However, the approach of building more houses as the only solution to respond to the housing crisis and meeting local needs is unrealistic from a delivery perspective and unsustainable from a social and environmental perspective. Environmentally acceptable sites are limited in Eryri due to environmental designations, the risk of flooding and due to topographical issues, therefore it must be recognised that land use planning is only one of the mechanisms that can be used to provide local affordable housing.</p> <p>Gwynedd Council's Housing Action plan has given a high priority on provision of affordable housing and housing is to be built under the Tai Gwynedd scheme. The Council are purchasing dwellings to provide homes for intermediate rent (Eryri National Park is contributing financially to this scheme using affordable housing financial contributions). Housing Associations continue to build new social and intermediate housing. The Authority does not deliver affordable dwellings directly, however, it works closely with the Local Housing Authorities and Registered Social Landlords. The Authority is a partner of the Rural Housing Enabler service, which engages with communities to identify housing need, and Tai Teg, the intermediate housing register for North Wales. In terms of Economic Development, the Authority works closely with the two Local Authority Economic Sections. Eryri NPA and Gwynedd Council produced The Gwynedd and Eryri Sustainable Visitor Economy Plan 2035, which is a groundbreaking new strategy that introduces a totally different approach to measuring the impact of tourism in Gwynedd and Eryri.</p> <p>The SPG's purpose is guidance for planning applications for changes of use between residential Use Classes, and does not provide policy guidance on other issues which are contained in Eryri Local Development Plan. There is an existing SPG on affordable housing.</p>	
020	003	John Reynolds			The list Community Council Areas has the first one as ABER. Where is this I have searched and cannot find one of that name.	Clarification sought on community council name, Aber.	Aber is the name of the community council for the Abergwyngregyn area	No changes proposed.
021	001	Rhys Jones	NRW		We have reviewed the SPG, and are of the opinion that it does not affect a matter listed on our Consultation Topics, Development Plan Advisory Service: Consultation Topics (September 2018): https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development-in-projects/planning-and-development/our-planning-and-development . We therefore have no comments to make on the SPG.	No impact on environmental matters.	Noted	No changes proposed.

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022	001	Chris Jones	NHS Wales; BCUHB Integrated Health Care team (IHC) West	2.3	<p>Please see below a comment received from the BCUHB Integrated Health Care team (IHC) West regarding the consultation by the Eryri National Park Authority regarding the Draft Supplementary Planning Guidance on Managing the use of Dwellings as Holiday Homes (Second Homes and Short-Term Holiday Lets.) The comment is from Primary Care..</p> <p>Section 2.3 of the Guidance states that.... "Eryri has high levels of second homes and short-term holiday lets, with 17% of housing stock being used for these purposes, which is high in comparison with most other areas nationally".... From a General Practice perspective, this has implications as their funding is based on the number of registered patients. Temporary residents (visitors) do not attract additional funding since this was built into the global sum around 20 years ago. The increase in homes which are converted to holiday residences means a reduction in the number of registered patients coupled with an increase in the number of people seeking treatment as "Temporary Residents". This places pressure on already strained budgets.</p>	For GP purposes, funding is based on number of registered patients' Temporary visitors do not attract additional funds. An increase in holiday lets means a reduction in registered patients, and an increase in those seeking treatment as temporary residents. This places pressure on already strained budgets.	Noted. LDP policies seek to safeguard the social well-being of local communities, as those occupants living permanently in the area are more likely to utilise and support a broader range of local services.	No changes proposed.
023	001	Abbie Connelly	Lichfields		<p>Tourism & Economic Impact: To retain a sustainable rural economy within the National Park, supporting tourism that benefits the local economy, environment and 'Special Qualities' of the National Park (referring to Revised Eryri LDP (2016 - 2031) Strategic Policies H and I), emphasis should be made to how second homes can support the local tourism industry, bringing economic benefits to the area, e.g., spending in local business by second home owners and visitors, bolstering the local economy.</p>	The SPG should state the importance of tourism to the economy and the contribution of second homes and holiday.	It is agreed that the SPG should acknowledge the contribution of the visitor economy, and second homes and short-term holiday lets to the economy. As a National Park, it but it must also be ensured that the area and its special qualities are protected and safeguarded. The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities	<p>Paragraph added to section 2:</p> <p>The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities. Holiday homes play an important role in supporting the local tourist industry. This guidance seeks to strike a balance between the benefits of tourism and the housing needs of communities.</p>
023	002	Abbie Connelly	Lichfields		Limited Market: It should be acknowledged that unique, isolated and potentially off grid properties (without main services) have a limited market for owner-occupiers but have the potential to support the important tourism economy. The change of use of such properties to C5/C6 would not have the potential to cause either individual or cumulative adverse amenity impacts that might be associated with changes of use to C5/C6 within residential settlements, taking into account amenity impacts referred to in Section 5 (Other Considerations) of the draft SPG.	Isolated, rural dwellings without main services, have a limited market for owner-occupiers but have the potential to support the important tourism economy, will not cause much adverse amenity impacts for changes to C5/C6	In terms of amenity, it is accepted that second homes have less potential for harmful amenity impacts than short term holiday lets. However, there are more considerations than amenity for second homes and holiday lets in rural or isolated areas. There is the impact on community cohesion, on local services and facilities, with properties being empty for long periods of the year. This does have a cumulative impact on a community, including less populated rural areas. The importance of conserving the National Park's Special Qualities is also an important focus of the work of the National Park Authority, Cynllun Eryri and the Eryri Local Development Plan. Introducing an Article 4 to manage the number of	No changes proposed.

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							second homes and holiday accommodation will contribute towards conserving and enhance “the robust sense of community cohesion, belonging and vibrancy which combine to give a strong ‘sense of place’” as well as “the continuing vibrancy of the Welsh language as the primary language in social and professional environments”.	
023	003	Abbie Connelly	Lichfields	4 & 5	Rural Exceptions: Whilst it is considered important that second homes and short-term lets do not dominate the existing housing stock across the National Park Authority area, we suggest flexibility should be applied to the key tests referred to within Section 4 (Managing Second and Holiday Homes) and 5 (Other Considerations) of the draft SPG. For example, if a property is situated in an isolated, off grid rural location, it should not have to also demonstrate that it is in an area that meets the 15% threshold test. Given the unique and remote nature of such properties market demand is more limited, so the impact of the Article 4 Direction is more onerous. This allows for a more balanced approach to managing Eryri's housing stock, considering specific circumstances of each property and area, in line with paragraph 5.6 of the draft SPG that states, “ <i>each case will be assessed on its own individual merits, alongside the relevant Local Development Plan policies and all other material considerations</i> ”. It is important to note that specific exceptions would not undermine the objectives of the Article 4 Direction but would instead ensure such properties can continue to exist and support wider economic objectives.	The SPG should contain 'rural exceptions', e.g. isolated, off-grid properties, should not have to meet 15% threshold, as demand is more limited, therefore the A4 is more onerous.	<p>Difficulties in selling properties can be due to many reasons, such as location, condition of the building, structural issues, infrastructure, state of the housing market and mortgages etc. Houses are often on sale for long periods, and the lack of sale over 12 months would not necessarily be due to the Article 4 Direction, and would be difficult to attribute to this reason alone.</p> <p>In terms of amenity, it is accepted that second homes have less potential for harmful amenity impacts than short term holiday lets. However, there are more considerations than amenity for second homes and holiday lets in rural or isolated areas. There is the impact on community cohesion, on local services and facilities, with properties being empty for long periods of the year. This does have a cumulate impact on a community, including less populated rural areas. The importance of conserving the National Park's Special Qualities is also an important focus of the work of the National Park Authority, Cynllun Eryri and the Eryri Local Development Plan. Introducing an Article 4 to manage the number of second homes and holiday accommodation will contribute towards conserving and enhance “the robust sense of community cohesion, belonging and vibrancy which combine to give a strong ‘sense of place’” as well as “the continuing vibrancy of the Welsh language as the primary language in social and professional environments”.</p> <p>The rural exception approach that is suggested is not agreed to. The cumulative impact of second homes is more than one of amenity alone.</p> <p>In terms of being onerous in terms of the impact upon house prices, the response to this matter in the Consultation Report for the Article 4 Direction, concludes that the impact of the Article 4 Direction on house prices is difficult to quantify, as there are many factors that will influence house price value. If house prices rise or fall, it is often due to several factors, and it is difficult to attribute how much a single factor has contributed to a change. Research shows that the use of a primary residency condition by other local authorities and national parks has not resulted in any significant reduction in house prices.</p>	No changes proposed.
023	004	Abbie Connelly	Lichfields	6 & 7	What development types e.g., new build development, change of use etc. are being referred to within Section 6 (Relevance of other Eryri Local Development Plan to the Article 4 Direction and C3, C5 and C6 Use Classes) and 7	Seeking clarification on relevant development types	The relevant section of the SPG has been re-written to provide more clarity on the relevance to different development types.	Sections 6 and 7 re-written to provide more clarity. See track changes in the SPG

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					(Planning Conditions for new build housing and conversions) of the draft SPG, as this is not clear.			attached to the SPG Committee Report for the detail.
023	005	Abbie Connelly	Lichfields	4	What evidence the 15% threshold figure, referred to in Section 4 (Managing Second and Holiday Homes) of the draft SPG, is based on as this has also not been made clear within the draft SPG.	What evidence is behind the use of a 15% threshold	Appendix B of the Consultation Report contains the officer response to comments on the use of a 15% threshold.	No changes proposed.
024	001	Simon Melhuish		4, 2 & 10.3	The proposed guidance is to disallow C3 to C5/C6 change of use above 15% existing C5/C6 usage (measured by council tax premium or non-domestic rates) at a community level. The policy justification is to increase C3 supply to meet demand. However, what evidence is there of demand exceeding supply particularly in these >15% communities? Isn't demand actually higher elsewhere, i.e. an anti-correlation between the C5+C6 fraction and the C3 demand? Clearly C5+C6 demand is higher in the communities that already have high proportions and singling out these communities to forbid C5+C6 use is a dangerous interference without necessarily improving the situation for people needing a C3 residence in the communities where they want to live. I suggest a flat value across the national park should be used instead. Otherwise, the driving force is to level out C5+C6 across the whole park, ignoring the very obvious preference for C5/C6 in particular areas, which would be unrealistic.	The use of a 15% threshold will lead to increase in C5/C6 in those areas below it, and reduction in areas above. There is no evidence of a demand for C3 in areas above 15%, and the demand is in area below. A flat value across the whole park should be used, or there will be a levelling out of C5/C6 across the whole park.	Appendix B of the Consultation Report contains the officer response to comments on the use of a 15% threshold. This refers to research on thresholds used by other authorities and reports. Areas under 15% will be subject to measures under the tax regime, which has dis-incentivised second home ownership and holiday let, therefore a significant increase in numbers may not occur. The numbers will be monitored, and policy can react to any significant or unexpected trends. The review of the Local Development Plan will also allow monitoring data to be taken into account and a review of the impact of the threshold.	
024	002	Simon Melhuish		5.2	This lists effects of short term lets (C6) only. However, this is being used to justify also restrictions of 2nd home (C5) use. I assert that C5 use has zero to little effect on residential amenity and that "second homes" should be deleted from section 5.2. This is another reason not to assess C5 permissions on the basis of combined C5+C6 statistics. They should at least be measured and assessed separately.	C5 will result in little of the residential amenity impacts stated in 5.2 and should not be included in this section. C5 should not be assessed based on the combined C5/C6 data but should be measured and assessed separately.	There are certain broad requirements which all development should meet if it is to be acceptable within the National Park. These requirements are listed under Development Policy 1: General Development Principles. Amenity is considered to be a relevant material consideration when considering changes of use of dwellings. The combined numbers of second homes and short-term lets have a similar impact on reducing the number of homes available on a permanent basis. Both uses will result in dwellings left empty for significant periods of the year, which impacts upon community cohesion and services. It is considered reasonable to assess the numbers of second homes and short-term holiday lets as a combined percentage.	No changes proposed.
024	003	Simon Melhuish		8	It is unrealistic to expect second home users to provide records of such use. Whilst council tax premium provides a relevant proxy for this it is not the full story and does not reflect historic usage. Consideration should be given to "anecdotal" evidence (e.g. from the homeowner) and accepted in the absence of evidence to the contrary.	Applicants for a CLEUD should not have to submit records such as tax etc as it does not give whole and historic picture. Anecdotal evidence should be accepted.	LDC's are assessed using legal tests, on the balance of probabilities. The advice to keep records such as tax records or invoices is considered to be useful guidance. The onus of proof is on the applicants; they will be free to submit any evidence they have on the use made of the dwelling. Evidence can be in the form of records or statements made by the owners. It is not considered necessary to provide detailed guidance. Each case will differ and there will be varying forms of evidence submitted.	No changes proposed.
024	004	Simon Melhuish		10.1	"and research suggests it underestimates the actual numbers" No citation is provided for the supposed research. Rather I would suggest council tax premium records may be an overestimate, because some people will be paying to protect their future use of their property. Whilst currently they may be using the property as their main residence, in anticipation of application of this policy they might pay the premium rather	There is no evidence that the numbers of second homes and holiday lets is an under-estimation. Council Tax premiums are more likely to be an over estimation. Some may be paying the premium to	There is reference to this matter in the Justification Paper. Evidence from other sources, such as Transparent Intelligence via the WG, shows the tax figures are an underestimation of the amount of holiday accommodation. The Authority disagrees with the scenario used in the	No changes proposed.

Resp ID	Rep ID	Name	Organisation	Para No.	Representation	Officer summary	Officer response	Changes proposed
					than risk not having legal use at all in the future, in the event that exigent circumstances prevent them from continuing to use it as C3.	protect their property as a second home, whilst using it as a main residence.	representation. Paying second home premium alone is not sufficient to establish a C5 use. The use must physically commence for there to be a material change of use to a C5. If the premium is being paid, but the use remains a main residence, planning permission will still be required to change to a C5 use.	
024	005	Simon Melhuish			The 15% criterion is very crude. This policy should be implemented much more flexibly, e.g. by taking into account historic use; if whilst the property is currently C3 but in the past it has been used extensively as a second home or short-term let the presumption should be to allow the change of use back.	Historic use should be taken into account. Properties with historic uses as C5 or C6 should be allowed to change back to C3.	A historic use as a short-term holiday let or second home, when there has subsequently been a material change of use to a main home, means that the lawful use has changed, and planning permission would be required to revert to a main home. The fact that a home may have previously been used as a second home or short-term holiday let is not considered to be a factor that should lead to approval. The assessment is made based on the current level of second homes and short-term holiday lets, and the resulting impacts. In areas of high concentrations of second homes and short term lets, there could well be many properties which have been previous used for these uses, which could result in further increase in numbers, and counteracting the aims of the Article 4 Direction and LDP Policies.	No changes proposed.
024	006	Simon Melhuish			A major flaw resulting from strict application of this crude criterion is that it greatly disincentivizes change of use from C5/C6 to C3 as a longer-term rental. Anybody who really prefers to keep their property for C5 or C6 use, despite being under financial pressure, would surely only consider making it available as C3 when circumstances get really desperate. If properties with C5/C6 use rights gain market value relative to C3 properties, as is very probable, this will additionally weigh against renting them out. Therefore you should provide an easy route to return a property to C5/C6 after a spell as C3, which would undoubtedly increase the C3 rental supply from such owners.	It will result in fewer changing their C5/C6 to a C3 rental, as they may not be able to gain permission to change back to C5/C6. There should be a route to change to C3 for a period and back to C5/C6 at a later date.	The scenario highlighted could occur in low number of cases. It is accepted that this could be an unfortunate impact of A4D. The change of use to C3 from C5 or C6 will be a permitted development, but planning permission would be required to revert back. The control of Holiday Homes in areas of high percentage is the main priority of the Article 4 Direction. It would be difficult to differentiate cases where there has been a temporary use as C3.	No changes proposed.

Appendix 2: Officer response on the use of a 15% a threshold

- 1.1 There is reference to the use of a ceiling or threshold to manage the number of second homes or short-term lets in national policy guidance (Para 4.2.5 Planning Policy Wales 12 Edition 12, 2024). In terms of what level the threshold should be, no guidance is provided, and it is the role of the Local Planning Authority to consider this, based on evidence.
- 1.2 Research has been undertaken by the Authority to similar approaches by other planning authorities in the UK as to what threshold or trigger of 'harm' or tipping point for making communities socially unviable is typical. These vary between 10 and 20%, with 10% used in make local planning authorities in Wales when an area has reached the point at which further Houses in Multiple Occupation would cause harm to a local area¹, 15% used by Gwynedd Council², and 20% used by Northumberland Council³ for a primary residency condition. Northumberland council, and other English local planning authorities, use or refer to a 20% threshold, based on census data. Census data also includes empty properties, therefore the percentage will be higher than if it was derived from only tax data of second homes and short-term holiday lets.
- 1.3 The overall percentage of the total housing stock for second homes and short-term holiday lets for Eryri National Park as whole was 17.4% in 2024. As detailed in the Article 4 Direction Justification Report, this only accounts for properties registered for tax purposes, and is almost certainly an under-estimation of the actual numbers.
- 1.4 The use of a 15% threshold is considered to be a level that reflects the existing policy frameworks use by other authorities. Using 2024 data, the amount of community council areas within or partly within the national park boundary above the 15% threshold is 20, and the number below is 28. The majority of areas are therefore below the threshold, meaning there will not be a presumption against granting planning permission for C5 or C6. The threshold means that the presumption against new C5/C6 units is concentrated on the areas where there is higher pressure from these uses. This approach balances the need for control in areas of high concentration to retain the essential character of those communities and allowing economic benefits of C5/C6 in areas of low concentrations. Areas above the threshold have an existing stock of second homes and holiday lets that will continue to contribute to the local tourist economy.
- 1.5 The Article 4 Direction's aim is not to prevent all new second homes and holiday lets. It seeks to manage an increase in their numbers in areas where a high concentrate is having a negative impact on the community. The negative impacts are explored further in the Article 4 Justification Paper.
- 1.6 The review of the Eryri Local Development Plan provides an opportunity to review the monitoring data, threshold and relevant policies.

¹ The figure of 10% is recommended in the 2015 Welsh Government Houses in Multiple Occupation: Review & Evidence Gathering report.

² Supplementary Planning Guidance – Tourism Facilities and Accommodation, Gwynedd Council

³ Northumberland Local Plan 2016-2036, Northumberland County Council

Authority / Source	Document / Policy	Threshold
Northumberland County Council	<p>Policy HOU 10</p> <p>With Parishes identified in the most up-to-date Census as having 20% or more household spaces with no usual (i.e. permanent) residents, new market dwellings will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a 'principal residence'. This restriction will be secured through a planning condition or Section 106 agreement</p>	20% based on census data which includes empty properties
Cyngor Gwynedd	<p>SPG Tourism Facilities and Accommodation</p> <p>LDP Policy TWR 2 (criterion 5) clearly states that no holiday accommodation provision should lead to an 'excess' holiday accommodation in a specific area.</p> <p>Favourable consideration will not be given to applications for self-serviced holiday accommodation when the existing combination of holiday accommodation and second homes within the Community/Town/City Council area is higher than 15%. Council Tax information should be used as the information source in order to find this information.</p>	15% based on tax data
Cumbria Rural Housing Trust 2003	<i>'Housing: An Effective Way to Sustain our Rural Communities'</i> – When second homes form 20% or more of the market, this appears to affect the sustainability of the village	20% based on census data which includes empty properties
'The Cumbria Housing Strategy 2006/2011'	Makes the following recommendation: The percentage of second homes should not be more than 20% or more as this appears to affect the sustainability of any village	20% based on census data which includes empty properties

Cumbria Housing Strategy and Investment Plan 2011-1	Mechanisms are established to ensure that second homes/holiday homes do not form more than 20% of the local housing market	20% based on census data which includes empty properties
Brighton & Hove Albion City Council	Tourism, Equalities, Communities and Culture Committee report, 16 June 2022	Analysis of successfully adopted planning policies indicates that a threshold or trigger of 'harm' or tipping point for making communities socially unviable is typically 20% of local dwellings
Paper/report: Low-use homes in rural and coastal areas of the UK: Geography, impact and responses - Rowland Atkinson and Rafaella Lima (University of Sheffield), Jonathan Bourne (University College London) and Chris Bailey (Action on Empty Homes)	that 5% of properties in low-use properties to be a useful and viable threshold to trigger a series of interventions. Using LSOA-level data offers the option of more localised targeting at a scale that is similar to a Neighbourhood Planning, or Conservation Area level—scales at which planning constraints already operate in related areas of local planning policy. 5% or above places a LSOA in the top decile nationally and may be a more effective point for intervention (rather than waiting until 10 or 20%, when the proliferation of low-use home is much more difficult to address). Data set out previously in section 3 could be used to identify local authorities and LSOAs with 5% or more low-use properties.	5%
Houses in Multiple Occupation: Review & Evidence Gathering. Welsh Government April 2015.	"A proportion of 10% HMO households has been used in some planning policies as a benchmark for significant impact on communities". The report recommends a threshold of 10% for HMO management and regulation.	10%
Wrexham County Borough Council Swansea Council Conwy County Borough Council	Wrexham Local Development Plan (2013 – 2028) Conwy RDPL evidence base. Swansea Council Local Development Plan (2010 – 2025)	10% threshold of all residential properties within a 50m radius of a HMO

A 2003 Countryside Agency document 'An Effective way to Sustain Rural Communities'	This document is quoted by several reports; the original document can't be located	15%; it is not know on what data this is based upon.
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