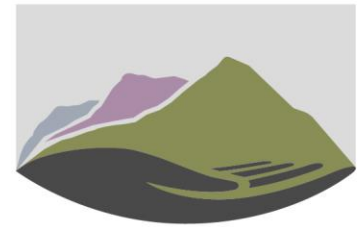


SH 34
Ymgynghoriad ar ail gartrefi
Consultation on second homes
Ymateb gan: Cymdeithas Eryri
Response from: Snowdonia Society


Y Pwyllgor Llywodraeth Leol a Thai /
Local Government and Housing Committee

Senedd Cymru

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Senedd Inquiry into second homes:

Response from Cymdeithas Eryri Snowdonia Society

13th January 2022

Cymdeithas Eryri is Snowdonia's conservation charity, established in 1967. We have 11 staff, 10 trustees, 1500 members. Each year we work with hundreds of volunteers. Our work is focused on:

- action to protect and enhance the special qualities of Eryri
- supporting responsible and sustainable enjoyment of beautiful landscapes.
- opportunities for young people to build skills, knowledge and experience through volunteering, accredited training, work experience and paid employment.
- working in close partnership with public & third sector and businesses to care for Eryri.

Cymdeithas Eryri's charitable purpose is to protect and enhance Eryri's special qualities and to promote their enjoyment in the interests of all who live in, work in or visit the area, both now and in the future. **The Welsh Language and Community Cohesion are of particular relevance and importance as two of Snowdonia National Park's identified special qualities.**

For over half a century our practical work has included responding to the ways that people use the National Park and to the impacts that visitors have on places and people.

In the course of the pandemic we have focused our work: in 2020/21 the majority of our staff time went into direct practical responses to visitor pressures. With support from Welsh Government, we have led a large-scale third sector/public sector partnership providing extra capacity to respond to pressures on people and places in and around the National Park. Well over a hundred local people have given their time to this programme as volunteers. We have invested tens of thousands of pounds in targeted messaging to visitors and prospective visitors, to inform more responsible and sustainable visitor behaviours and build respect for the area and its people.

As an employer we are acutely aware of the housing market and pressures in the local communities where our (90% Welsh-speaking) staff live. Our commitment to those staff,

1967 - 2017

Yn gwarchod, gwella a dathlu Eryri ers 50 mlynedd - Protecting, enhancing and celebrating Snowdonia for 50 years

Elusen gofrestredig rhif/Registered Charity no: 1155401

reflected in our status as a Living Wage employer, provides an important backdrop to our submission to the consultation.

In terms of our registered charitable purposes, our practical work on the ground, and our role as a local employer and part of civil society, therefore, it is appropriate for us to comment on the Senedd and Welsh Government consultations on the impacts of second homes in Snowdonia and policy options for management of those impacts.

In drafting our response we have consulted with Campaign for National Parks (CNP), Alliance for Welsh Designated Landscapes (AWDL) and have studied input from others including RTPi Cymru.

Key consultation points

The Welsh Government proposals would allow local planning authorities to introduce a requirement for planning permission when turning a permanent dwelling into a second home or holiday let.

The proposals include:

- new use classes for ‘Primary Homes’, ‘Secondary Homes’ and ‘Short-term Holiday Lets’, based on the number of days dwellinghouses are occupied, and by whom. Currently there is no distinction between types of dwellinghouses and therefore no requirement for planning permission when e.g. changing from a permanent residence to a second home.
- planning permission will not be automatically required - the local planning authority may require this through the use of an Article 4 Direction.
- amendments to permitted development regulations to provide permissions process for changes between the new use classes
- permitted development rights for change of use class can be disapplied within specified geographic areas by an Article 4 Direction made by a local planning authority
- amending Planning Policy Wales (PPW) so that the prevalence of second homes and short-term holiday lets in a local area must be taken into account when considering the housing requirements and policy approaches in Local Development Plans (LDP).
- where the local planning authority imposes an Article 4 Direction, a condition could be placed on all new dwellings restricting their use to primary residential where such conditions would meet the relevant tests.

Second homes are prevalent in some parts of Snowdonia, less so in others. Where a significant proportion of housing stock is bought by people from outside the area as a second home or let as holiday homes this can have a huge impact on community life, services and facilities, and ultimately on the sustainability of the community. Patterns are complex and subject to change and some of the ‘hotspots’ are far from the obvious coastal locations.

We believe that Covid-related work-and-lifestyle choices are likely acting now as pressures for more second homes and holiday rental homes, with implications for house prices in and around the National Park.

We are supportive of the intention and direction of Welsh Government's proposals. We recognise many of the pressures and impacts identified as being real and significant. Where measures with an evidenced potential to achieve positive change can be identified we will be minded to support them.

Having expressed general support for action, however, there are some grounds for care and caution. The complexity of the social and economic interactions bound up in these issues make it important to be clear and specific about which measures are intended to tackle which issues. Unintended consequences are a significant risk.

The Welsh Language and Community Cohesion – special qualities

The most important single issue in this consultation for us is the impact of housing pressures, and the proposed solutions, on the Welsh language.

As one of the heartlands of the Welsh language, we consider Eryri's linguistic and cultural heritage an essential part of its special qualities – which Cymdeithas Eryri is dedicated to protect. Although we welcome any initiative which encourages and supports the use and protection of the language, we do question why the matter of the language is confined to a single recommendation (Recommendation 12), rather than explicitly integrated across all the others.

We would like to see much more detailed analysis of the anticipated impacts on the Welsh language of each of the proposed measures and the interactions between them.

Second homes can become first homes of course, and for some people the measures that are put in place may affect the extent to which they contribute to the Welsh Language and community cohesion. Second homes are only one of many areas which need to be addressed if the language is to survive and flourish in key locations under pressure. Alongside regulation and taxation we need investment in language; part of that is supporting Welsh learners, some of whom become contributors to the life of the language.

We would like to see joined up planning and thinking from Welsh Government, setting out how action on second homes will contribute as part of a wider suite of measures and initiatives to support the Welsh language.

Macroeconomic and societal drivers of the second home phenomenon are not static. The patterns are likely to be changing and it will be important that new measures are as capable as possible of keeping up with what can be rapid changes in market forces. The Brexit/Covid impacts will slowly untangle. New measures will need to be responsive to big trends such as the geographical decoupling of home and workplace. This is an unprecedented change and we have surely not yet got the measure of how far and fast it will develop, and how it will affect rural Wales. We suspect it is a major impact, but we are still at this stage guessing.

Second homes are not the only factor making it harder to sustain the life of rural communities. Community cohesion may not be enhanced if new housing measures set up *distinctions between properties* which become a source of additional *divisions between people*. Clarity and fairness in how measures are introduced, structured and enforced will be essential.

One specific risk is a version of the 'halo' effect whereby measures simply displace a problem. New planning permission requirements for Secondary Homes and Short-term Holiday Lets (STHL) within specified Article 4 areas may displace current market pressures rather than reducing them. In this scenario communities outside Article 4 areas may find themselves suffering from new pressures. In the worst scenarios, buyers in the Secondary Home and STHL segments of the market may prove more agile than planners, resulting in a rapid escalation of pressures in areas not subject to Article 4 measures.

In Eryri, holiday lets form a major element of the local tourism economy. Within the current or dominant model of tourism these businesses support the tourism sector more widely and also support local property owners who use holiday lets as an additional income. These facts sit within a bigger question; is the current model of tourism either desirable or sustainable? Efforts to investigate and develop more sustainable tourism models are ongoing in Eryri and elsewhere. What might future visitor accommodation needs be in a sustainable tourism scenario? This is a strong argument for looking at the problems caused by second homes and holiday homes not as a static fixed situation but as symptoms of situation in a process of change. Alongside second homes, Welsh Government and civil society needs to scrutinise and help steer how the visitor industry will change emphasis & develop in future years, taking stock by listening to the business practitioners themselves. We need to be working together to deliver strategic planning for a more sustainable tourism model for Wales.

To note: the study which forms the basis of this consultation is based mainly on publications, reports and research done or commissioned by Anglesey and Gwynedd councils, as well as the Welsh Government. Comparisons are made with Cornwall and the Channel Islands. It is perhaps unfortunate that geographically wider examples are not referenced. Comparable situations outside the UK are hardly mentioned, whereas in Europe alone there are numerous examples where languages are threatened: Romansch (Switzerland), Friesian (Netherlands), Sorbian (Germany) and Provençal (France), among others, all under pressure from second homes.

Recommendation 1 – develop regional and local variation in public policy.

This issue operates at national, regional and local levels. We agree that regionally and locally applicable measures are likely to be useful, within a clear national framework.

Local Planning Authorities have a role to play in identifying where second homes and holiday rental homes are having an impact on communities and/or language.

Although its communities are not as affected as those in Ynys Môn and Llŷn, Eryri's inland communities are also significantly affected. In Beddgelert and Arthog second homes make

up over 20% of their housing stock; and eight communities have in excess of 10% of their housing stock as second homes. Data show Bethesda, Llanberis and Llanfrothen as less significantly affected, but we know that local hotspots also exist *within* these otherwise less-affected communities. For instance, 40% of the houses in the village of Rhyd, in the Llanfrothen community are second homes.

Recommendation 2 – control of the numbers of second homes.

We support this recommendation in principle but note the report's concerns over 'unintended consequences'. Despite these concerns, we support the aim to ensure stability as regards the numbers of second homes in communities affected by them, or to reduce their numbers *gradually* over a number of years.

Recommendation 3 – the definition of second homes.

We support the call for a better definition of second homes and consider that the introduction of a licencing scheme would help with implementing new housing policies. We also recognise the complexity of this approach, given the highly variable ways that second homes are used, and the fact that the definition of primary and secondary can be blurred with the increase in owners occupying their second homes for extended periods of homeworking since the COVID-19 pandemic.

Recommendation 4 - respond to Brexit and Covid-19

We agree that it is likely that Covid and Brexit have or are leading to more houses being bought as second homes or rented as holiday homes. The likelihood of this driving local house prices out of reach of local people is high and warrants attention and action where mechanisms can be identified.

Recommendation 5 - the need for action across a range of policy areas

Recommendation 6 - Local Council Tax Premium

Recommendation 7 - Short-term holiday accommodation and business rates

Recommendation 8 - Land transaction tax

We agree that the proposals 5-8 above are worth investigating and could be useful tools, subject to the caveats we have already outlined on 'halo' effects, unintended consequences, and clarity and fairness of their application.

Recommendation 9 – Gwynedd and Anglesey Councils' 'Local Market Housing' Scheme.

We support this proposal in principle, but note that as it applies to new buildings, it will have a lesser impact in Snowdonia where such developments are rarer than the surrounding lowland communities. It may be that Snowdonia National Park Authority is better placed to develop its own Local Market Housing Policy, given the particular policy context and pressures here.

Recommendation 10 – the creation of a new use class for short-term holiday accommodation.

We share the report's concerns about the negative effects of increasing numbers of properties being purchased by investors wishing to let them as short-term lets, through agencies such as Airbnb. We therefore welcome moves to control and limit this element of Snowdonia's housing stock to protect the proportion of properties in full-time residential occupancy.

We agree that Welsh Government should amend the Town and Country (Use Classes) Order (Amendments) (Wales) 2016 and introduce a new use class for short term holiday accommodation. We also agree with the Snowdonia National Park Authority that planning permission should be required before a house can be converted into a second home or a holiday let.

The introduction of a new use class would overcome any doubts about when a change of use has occurred. We would welcome such a change, but note that the planning authority would need additional resources to implement such a change.

Recommendation 11 – trialling a new use class for second homes.

We note with interest the Report's proposal that a new use-class be created for the existing housing stock, which would require change-of-use planning consent for conversion to second home/holiday let. Whilst we share the author's concerns about creating a two-market housing system – and the likely legal challenges to such a move – we also note that there is little or no empirical evidence that this system would have a detrimental impact. We therefore support the report's recommendation to *trial* this approach in a community where there is majority support. Robust objective monitoring and evaluation of the trial would be essential.

It will be important to mitigate the risk of moving the problem of second homes to neighboring communities. Many viable Welsh-speaking communities are currently unaffected by second homes – it would be a tragedy if measures to address the second homes issue simply moved the problem to those communities.

Recommendation 12 – establish a Commission to make recommendations regarding the future of the Welsh language as a community language.

As one of the heartlands of the Welsh language, we consider Eryri's linguistic and cultural heritage an essential part of its special qualities – which Cymdeithas Eryri is dedicated to protect.

Although we welcome any initiative which encourages and supports the use of the language, we do question why the matter of the language is confined to a single recommendation, rather than explicitly integrated within the others.

Given that the second homes issue is just one of many factors which threaten the future of the language, we would hope that such a commission would be comprehensive in its scope,

rather than confined to the second homes issue. Nevertheless, if such a commission were to be established, we would wish to see it pursued as a matter of urgency with a quick turnaround, given the active nature of the threats listed in the bullet points on Page 70 of the report.

Thank you once again for the opportunity to submit our views.

John Harold

Director, Cymdeithas Eryri Snowdonia Society

Peatland restoration – Cymdeithas Eryri volunteers and partners working together for a brighter future