

APPENDIX 2
Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
1.1	Mr and Mrs Tongue	Support	Considers that sustainable tourism accommodation is vital addition to smaller agricultural holdings struggling to make a viable income. This type of tourism enables tourists to gain a better understanding of rural life. 'Glamping' lends itself to the surroundings giving tourists a greater opportunity to share the beauty of our flora and fauna.	Support noted.	Note support.
2.1	Mr Newman	Comment	Suggests that shepherd's huts will be considered mobile (as on wheels) and treated like holiday caravans with the same terms and conditions.	Comment noted. Shepherd's huts are not considered mobile units (as explained in the SPG) and will not be treated like holiday caravans when assessed through the LDP policy framework. As noted in paragraph 3.4 of the SPG, shepherd's huts typically comprise a solid wooden frame on cast iron wheels and are transported onto a site as a complete unit. As such they cannot be categorised as a touring unit given their greater degree of permanency. This is further clarified in Appendix B, which states that Policy T1 -Touring Caravan and Tented Camping Sites -is not applicable to proposals for shepherd's huts as this type of accommodation would not fall within the scope of this policy as they are not typically considered to constitute a 'touring' facility as referred to in the policy.	No change.
2.2	Mr Newman	Comment	New build holiday accommodation in rural areas or elsewhere must have an inviolable condition that conversion to permanent residential dwellings will not be allowed.	Comment noted. To clarify, glamping proposals do not constitute 'new build' holiday accommodation as they have a limited degree of permanency and can be considered as a use of land rather than operational development (with the exception of tree houses). In any event, paragraph 4.22 of the SPG clearly states that the use of such visitor accommodation for permanent residential occupancy will not be permitted and that such accommodation must remain for the intended tourism purpose only so that the wider economic benefits are secured. Planning conditions will be applied to such proposals to control occupancy, as explained in paragraph 4.23 and Appendix C of the SPG.	No change.
3.1	Mr Brian Spencer	Support	Welcomes the Sustainable Tourism Accommodation SPG as it will assist landowners to diversify into tourism which will benefit the whole Monmouthshire economy.	Support noted.	Note support.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
3.2	Mr Brian Spencer	Comment	Considers that there will be a problem on some sites removing glamping units during the suggested 'closed' season.	The degree of permanency of glamping accommodation and the need to remove such accommodation from sites out of season is a key planning consideration and is addressed in paragraphs 4.18-4.19 of the SPG. The SPG advises that in general glamping accommodation should be taken down/ relocated out of season in order to safeguard the landscape amenity of an area. However, the necessity for this will be considered on a case by case basis depending on site context and landscape /visual impacts in winter months when tree cover is reduced. In instances where it can be demonstrated that there is no/limited landscape harm associated with the siting of the glamping accommodation during the winter months there would be no need to remove the accommodation. In this context, regard will also be given to the importance of maintaining a balance between the need to protect the landscape/environment and to avoid the negative effects on the local economy due to the seasonal nature of tourism - this will also be considered on a case by case basis.	No change.
3.3	Mr Brian Spencer	Comment	Considers the 'closed' season (30 September - 1 March) to be very restrictive and suggests that it be removed to allow flexibility in marketing and income potential for owners.	Seasonal occupancy in relation to glamping accommodation is considered important in order to safeguard the landscape amenities of an area. However, the SPG does allow some flexibility with regard to seasonal occupancy, as set out in paragraphs 4.19 and 4.23 and Appendix C (Planning Conditions) which clarify that consideration should be given to the importance of maintaining a balance between the need to protect landscape /environment and to avoid the negative effects on the local economy due to the seasonal nature of tourism. This will need to be considered on a case by case basis. The SPG recognises that where there is no/ limited landscape harm, the economic benefits of providing year-round (or extended) tourism accommodation can be given favourable consideration.	No change.
4.1	Natural Resources Wales	Comment	Paragraph 3.3 2nd bullet 'Protect and enhance landscape character & natural/historic environment i.e. visually unobtrusive'. Suggest removing reference to 'visually unobtrusive' as protecting and enhancing landscape character and visual amenity is not just about being visually unobtrusive.	Comment noted. Specific reference to 'visually unobtrusive' is included as it is considered important to highlight that visual intrusion is a key issue when assessing the impact of glamping proposals on the landscape and natural/historic environment. However, NRW's point that the protection and enhancement of landscape character and the natural/historic environment is not just about being visually unobtrusive is accepted. The reference to 'visually unobtrusive' will therefore be removed from paragraph 3.3.	Remove the reference to 'visually unobtrusive' from bullet point 2 of paragraph 3.3.
4.2	Natural Resources Wales	Comment	Paragraph 3.3 - Suggest separate bullet points for landscape character and natural/historic environment.	Comment noted. The bullet point refers to the protection and enhancement of both landscape character and the natural/historic environment. It is not considered necessary to list these separately.	No change.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
4.3	Natural Resources Wales	Comment	Paragraph 4.14 - Suggest that policies EP5 Foul Sewage Disposal and EP2 Protection of the Water Environment are listed in this section as separate bullet points. Note that this type of development could potentially be located in an area not served by public foul sewer.	Comment noted. This list of policies included in paragraph 4.14 is not exhaustive recognising that policies may vary on a case by case basis depending on site context and the proposal. However, in recognition of the fact that glamping accommodation could potentially be located in areas not served by public sewers, policies EP5 Foul Sewage Disposal and EP2 Protection of the Water Environment will be added to the list of policies in paragraph 4.14.	Include reference to LDP policies EP5 and EP2 in paragraph 4.14.
4.4	Natural Resources Wales	Comment	Suggest that the SPG should refer to the requirement for appropriate foul drainage facilities.	Comment noted. However, it is not considered necessary to specifically refer to the requirement for appropriate foul drainage facilities in the SPG. This is a detailed matter to be considered on a case by case basis. As advised in the SPG, applicants are encouraged to engage in the Council's pre-planning application advice service to determine which key LDP policies apply and to gain general planning advice, including on such matters as drainage.	No change.
4.5	Natural Resources Wales	Comment	Paragraph 4.21 - suggest that this should include reference to car parks.	Comment noted. Agree that reference to car parks should be included in paragraph 4.21 to ensure that car parks are considered in the context of minimal supporting infrastructure associated with glamping facilities.	Include reference to car parks in paragraph 4.21.
4.6	Natural Resources Wales	Comment	Paragraph 5.2 - suggest that this should refer to a 'landscape and visual appraisal' rather than landscape assessment.	Comment noted. However, the reference to 'landscape assessment' is considered appropriate given the context of the issue being conveyed. It is recognised that a full LVIA would normally be required for large/complex proposals. As advised in the SPG, applicants are encouraged to engage in the Council's pre-planning application advice service to gain general planning advice, including on such matters as the need for (and type of) a landscape assessment.	No change.
4.7	Natural Resources Wales	Comment	Appendix B - suggest that policies EP5 Foul Sewage Disposal and EP2 Protection of the Water Environment are listed in Appendix B for all types of accommodation.	Comment noted. However, it is not considered necessary to specifically include reference to policies EP5 and EP2 in Appendix B. It is clear that the policy considerations listed in relation to the various types of sustainable tourism accommodation are not exhaustive. Appendix B further states that relevant policies are likely to vary on a case by case basis depending on site context and proposal, and that applicants are advised to engage in the Council's pre-planning application advice service to determine which key policies apply to a proposal.	No change.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
4.8	Natural Resources Wales	Comment	Appendix C - suggest that other examples of planning conditions could be listed such as landscape schemes, lighting, colours/materials, access/car park surfacing.	Comment noted. However, it is not considered necessary to include other examples of planning conditions in Appendix C. As stated in the SPG, the list of example planning conditions is not exhaustive and planning conditions may be devised or adapted to suit a particular circumstance, including in relation to landscape schemes, lighting etc. The last paragraph of Appendix C states that 'additional conditions may be necessary, for example in relation to drainage, lighting, access and landscaping'.	No change.
5.1	Powells Chartered Surveyors	Comment	Consider that a main concern associated with the implementation of the SPG is a chance that the tourism industry in Monmouthshire will become considerably more saturated than it is now. With that being the case, it is considered that even though policy is oriented around usual forms of glamping there should be a general case by case approach to each application.	Comment noted. The SPG provides detail on the interpretation and implementation of the LDP policy framework in assessing proposals for sustainable tourism accommodation and sets out the key policy considerations in relation to specific types of such accommodation. For the purposes of this SPG sustainable tourism accommodation is primarily concerned with glamping facilities, however, should proposals for other types of sustainable visitor accommodation come forward these will also be assessed against the guidance set out in the SPG. The importance of assessing sustainable tourism accommodation proposals on a case by case approach is recognised including in relation to degree of permanency and seasonal occupancy.	No change.
5.2	Powells Chartered Surveyors	Support	Welcomes the reference in the SPG for applicants to take pre-application advice prior to the submission of an application for sustainable tourism accommodation.	Support noted.	Note support.
5.3	Powells Chartered Surveyors	Comment	Refers to paragraphs 4.18-4.19 which deal with the degree of permanency of glamping accommodation. Encourage the LPA to consider this matter on a case by case basis as there are likely to be instances where permanent structures need to remain in place outside of the tourism season e.g. wooden base/ raised decking associated with yurts; ancillary structures including amenity blocks. Request that the LPA take a pragmatic view in relation to each individual item of the built environment which an applicant proposes and assess on a case by case basis.	The degree of permanency of sustainable tourism accommodation and the need to remove such accommodation from sites out of season is a key planning consideration and is addressed in paragraphs 4.18-4.19 of the SPG. The SPG advises that in general glamping accommodation should be taken down/ relocated out of season in order to safeguard the landscape amenity of an area. However, the necessity for this will be considered on a case by case basis depending on site context and landscape /visual impacts in winter months when tree cover is reduced. In instances where it can be demonstrated that there is no/limited landscape harm associated with the siting of the glamping accommodation during the winter months there would be no need to remove the accommodation/ supporting infrastructure. In this context, regard will also be given to the importance of maintaining a balance between the need to protect the landscape/environment and to avoid the negative effects on the local economy due to the seasonal nature of tourism - this will also be considered on a case by case basis.	No change.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
5.4	Powells Chartered Surveyors	Comment	Suggest including other types of tourism accommodation which might not fit specifically with what the LPA considers to be sustainable tourism accommodation but which might be suitable e.g. shepherd's huts and tree houses. Consider that provided that such accommodation is implemented sustainably they should be considered on a case by case basis. Note that conditions can be applied to accommodation to prevent them becoming permanent or changing to permanent residential accommodation. Encourage the LPA to adopt a case by case approach for types of accommodation not specifically covered by policy.	As advised in the SPG (paragraph 4.4), LDP Policy S11 (Visitor Economy) is the starting point for assessing proposals for all types of sustainable tourism accommodation. This policy seeks to enable the provision of sustainable forms of tourism development subject to detailed planning considerations. Paragraph 4.5 states that proposals for sustainable tourism accommodation will generally be supported by Policy S11 unless ruled out by other LDP policies. The SPG specifically refers to shepherd's huts and treehouses as types of sustainable tourism accommodation (section 3). Section 4 and Appendix B of the SPG set out key policy considerations for assessing sustainable forms of tourism accommodation, including shepherd's huts and treehouses. The importance of assessing sustainable tourism accommodation proposals on a case by case approach is recognised, including in relation to degree of permanency and seasonal occupancy. For the purposes of this SPG sustainable tourism accommodation is primarily concerned with glamping facilities, although the guidance would also apply to other forms of sustainable visitor accommodation that may come forward.	No change.
6.1	Lower Glyn Farm Ltd (Powells Chartered Surveyors)	Comment	Consider a main concern associated with the implementation of the SPG is a chance that the tourism industry in Monmouthshire will become considerably more saturated than it is now. With that being the case, it is considered that even though policy is oriented around usual forms of glamping there should be a general case by case approach to each application.	Comment noted. The SPG provides detail on the interpretation and implementation of the LDP policy framework in assessing proposals for sustainable tourism accommodation and sets out the key policy considerations in relation to specific types of such accommodation. For the purposes of this SPG sustainable tourism accommodation is primarily concerned with glamping facilities, however, should proposals for other types of sustainable visitor accommodation come forward these will also be assessed against the guidance set out in the SPG. The importance of assessing sustainable tourism accommodation proposals on a case by case approach is recognised including in relation to degree of permanency and seasonal occupancy.	No change.
6.2	Lower Glyn Farm Ltd (Powells Chartered Surveyors)	Support	Welcomes the reference in the SPG for applicants to take pre-application advice prior to the submission of an application for sustainable tourism accommodation. Also welcome that the LPA are allowing consideration of other forms of tourism accommodation.	Support noted.	Note support.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
6.3	Lower Glyn Farm Ltd (Powells Chartered Surveyors)	Comment	Refers to paragraphs 4.18-4.19 which deal with the degree of permanency of glamping accommodation. Encourage the LPA to consider this matter on a case by case basis as there are likely to be instances where permanent structures need to remain in place outside of the tourism season e.g. wooden base/ raised decking associated with yurts; ancillary structures including amenity blocks. Request that the LPA take a pragmatic view in relation to each individual item of the built environment which an applicant proposes and assess on a case by case basis.	The degree of permanency of sustainable tourism accommodation and the need to remove such accommodation from sites out of season is a key planning consideration and is addressed in paragraphs 4.18-4.19 of the SPG. The SPG advises that in general glamping accommodation should be taken down/ relocated out of season in order to safeguard the landscape amenity of an area. However, the necessity for this will be considered on a case by case basis depending on site context and landscape /visual impacts in winter months when tree cover is reduced. In instances where it can be demonstrated that there is no/limited landscape harm associated with the siting of the glamping accommodation during the winter months there would be no need to remove the accommodation/ supporting infrastructure. In this context, regard will also be given to the importance of maintaining a balance between the need to protect the landscape/environment and to avoid the negative effects on the local economy due to the seasonal nature of tourism - this will also be considered on a case by case basis.	No change.
6.4	Lower Glyn Farm Ltd (Powells Chartered Surveyors)	Comment	Suggest including other types of tourism accommodation which might not fit specifically with what the LPA considers to be sustainable tourism accommodation but which might be suitable e.g. shepherd's huts and tree houses. Consider that provided that such accommodation is implemented sustainably they should be considered on a case by case basis. Note that conditions can be applied to accommodation to prevent them becoming permanent or changing to permanent residential accommodation. Encourage the LPA to adopt a case by case approach for types of accommodation not specifically covered by policy.	As advised in the SPG (paragraph 4.4), LDP Policy S11 (Visitor Economy) is the starting point for assessing proposals for all types of sustainable tourism accommodation. This policy seeks to enable the provision of sustainable forms of tourism development subject to detailed planning considerations. Paragraph 4.5 states that proposals for sustainable tourism accommodation will generally be supported by Policy S11 unless ruled out by other LDP policies. The SPG specifically refers to shepherd's huts and treehouses as types of sustainable tourism accommodation (section 3). Section 4 and Appendix B of the SPG set out key policy considerations for assessing sustainable forms of tourism accommodation, including shepherd's huts and treehouses. The importance of assessing sustainable tourism accommodation proposals on a case by case approach is recognised, including in relation to degree of permanency and seasonal occupancy. For the purposes of this SPG sustainable tourism accommodation is primarily concerned with glamping facilities, although the guidance would also apply to other forms of sustainable visitor accommodation that may come forward.	No change.

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
7.1	Cllr Louise Brown	Object	Questions why the SPG only relates to proposals outside settlement boundaries. Suggests that there may be more neighbour concerns within settlement boundaries with glamping accommodation than outside. Concerned that the policy does not stress the necessity to fully consider normal planning considerations within settlement boundaries or what policies would apply. Considers that the SPG should also include reference to the need to keep sites clean and tidy (amenity reasons).	The SPG is only intended to relate to proposals outside settlement limits to specifically address proposals for sustainable tourism accommodation in the open countryside where there is a need to balance economic and environmental considerations. Within settlement limits sustainable tourism accommodation is generally acceptable in principle subject to amenity considerations and planning policy matters such as flood risk. As such, there is no need to provide specific guidance for proposals within settlement limits. Any proposals for glamping accommodation within settlement limits will be subject to amenity considerations (LDP Policy EP1 Amenity and Environmental Protection refers). The comment relating to the need to keep glamping sites clean/tidy is noted, however, this is not a planning matter and cannot be addressed in the SPG.	No change.
7.2	Cllr Louise Brown	Comment	Suggests that Policy S11 should be amended to include reference to 'generally' (i.e. development proposals that provide and/or enhance sustainable forms of tourism will generally be permitted subject to detailed planning considerations).	Comment noted. It is not possible to amend LDP policies until the Plan is revised. Consideration can be given to the suggested amendment when the Plan is revised.	No change.
7.3	Cllr Louise Brown	Object	<p>Concerned that the SPG does not cover the following matters:</p> <ul style="list-style-type: none"> *removal of glamping infrastructure after the site is no longer used for glamping accommodation (should be removed at the same time). Need for sites to be fully restored if glamping accommodation is no longer used. *Need for sites to be kept clean and tidy at all times. *Careful siting of glamping infrastructure / hours of use to avoid being in vicinity of any permanent residential accommodation. <p>Suggests that paragraph 3.3 should be amended to include reference to the following points (bold text):</p> <p>*Include plans for glamping accommodation and any ancillary infrastructure accommodation to be sited away from the vicinity of any permanent residential accommodation, to protect and preserve neighbourhood amenity.</p>	<p>To clarify, paragraph 3.3 sets out the key principles of sustainable tourism which glamping proposals will be expected to accord with. To deal with the concerns in turn:</p> <ul style="list-style-type: none"> *Section 3, paragraph 3.3 states that in order to be considered as sustainable tourism accommodation the proposal should be capable of being removed without leaving a permanent trace. This is taken to include any supporting infrastructure associated with the glamping accommodation. However, for clarification specific reference will be made to supporting infrastructure in bullet point 7 of paragraph 3.3. *The cleanliness / tidiness of sites is not a planning matter and is not a matter that can be addressed in the SPG. *Paragraphs 4.20 - 4.21 provide guidance on the planning issues that should be considered in relation to supporting infrastructure, including scale, design and landscape impacts. As such it is not considered necessary to include any further guidance in the SPG on the siting of glamping infrastructure. Furthermore, paragraph 3.3 is concerned with the principles of sustainable tourism - as such it is not considered appropriate to include amenity as one of the principles of sustainable tourism. In any event, amenity considerations will be considered in relation to any proposal for glamping accommodation (LDP Policy EP1 refers). However, in order to highlight the amenity of neighbouring properties as an important consideration reference to this will be included in paragraph 4.14, Policy EP1. 	<p>Include specific reference to supporting infrastructure in bullet point 7 of paragraph 3.3.</p> <p>Include reference to the amenity of neighbouring properties in paragraph 4.14, Policy EP1.</p>

Sustainable Tourism Accommodation SPG Report of Consultation

Rep. No.	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation
			<p>*Protect and enhance landscape character and natural/historic environment i.e. visually unobtrusive and be well screened.</p> <p>*Capable of being removed without leaving a permanent trace including any ancillary infrastructure accommodation.</p> <p>*Plans to include methods of keeping the site clean and tidy both during and after seasonal use (litter, maintenance, sewerage etc) and if it is no longer used.</p> <p>*Ensure access to and from the site has good highway visibility.</p>	<p>*Paragraph 3.3 is concerned with the principles of sustainable tourism and as such it is not considered appropriate to include reference to 'well screened' as a principle of sustainable tourism. Furthermore, reflecting comments made by NRW on bullet point 2 of paragraph 3.3, it is recognised that the protection and enhancement of landscape character does not solely relate to being well screened or visually unobtrusive. Reflecting this, it is considered appropriate to amend the bullet point to read 'protect and enhance landscape character and natural/historic environment' (Comment 4.1 refers).</p> <p>* Highway visibility is a detailed highway matter - it is not considered appropriate to include this as one of the principles of sustainable tourism. Detailed highway matters are covered by Policy MV1 - Proposed Developments and Highways Considerations - which is referred to in paragraph 4.14.</p>	
7.4	Cllr Louise Brown	Comment	Suggests reviewing/amending Policy T1 to take account of the above concerns for the protection of neighbourhood amenity.	Comment noted. It is not possible to amend LDP policies until the Plan is revised. In any event, amenity and environmental protection is adequately addressed in LDP Policy EP1 and it would not be necessary to specifically refer to this in Policy T1.	No change.
	Mitchel Troy United Community Council (late representation)	Comment	The comments submitted appear to apply to the consultation on the Draft Rural Conversions to a Residential or Tourism Use SPG, and not to the Draft Sustainable Tourism Accommodation SPG.	See response provided in relation to the Draft Rural Conversions to a Residential or Tourism Use SPG.	N/A