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Ms Paula Jones,
Head of Planning,
Conwy County Borough Council,
By Email

13 May 2022

Re: 0/49626

Constituency Office

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Llandudno LL30 2TL

Swyddfa'r Etholaeth

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Dear Paula,

I hope that this letter finds you and all at the Planning Department well. I am writing to formally object to planning application 0/49626. This is for change of use from C1/Hotels to C4/Houses in Multiple Occupation after 5 July 2022.

It is important that the public and members of the Planning Committee be made fully aware of the context. So severe is the housing crisis in Conwy County Borough Council that the Local Authority spend is increasing exponentially. In 2018/19 £1,251,715 was spent on temporary accommodation, which increased to £1,227,898 in 2019/20, and £2,515,990 in 2020/21. This application is clear evidence that the Local Authority's decision to allow an increase on temporary accommodation spend is contributing to the loss of tourism accommodation in the heart of the sector in North Wales: Llandudno.

As you will be aware, there have been temporary changes made to the Town and Country Planning (General Permitted Development) Order 1995 (GPDO) which enabled local authorities to undertake development during the pandemic. Indeed, the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2020 (2020 Order) came into force in March 2020 and inserted a new Part 12A (Emergency Development by Local Authorities) into Schedule 2 to the GPDO. That permitted local authorities to undertake any form of development (as defined by section 55 of the Town and Country Planning Act 1990), on land owned, leased, occupied or maintained by the local authority for the purposes of: a) preventing an emergency; b) reducing, controlling or mitigating the effects of an emergency; or c) taking other action in connection with an emergency. Last year, it came to my attention that the Local Authority may have relied on Part 12A to enable the change of use of 11 Deganwy Avenue from a guesthouse to temporary residential accommodation without going through the planning process. At that time, it was clear that the move caused local residents and hoteliers serious distress as the guesthouse in question is situated on a street in the heart of a community which is renowned for its thriving tourist sector.

It is my belief that the application is in conflict with the Conwy Local Development Plan 2007-2022 (LDP), including Policy TOU/3 - Holiday Accommodation Zones, which states:

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‘Holiday Accommodation Zones are designated in Llandudno and shown on the proposals map. To safeguard an appropriate level of serviced accommodation for tourism, proposals for the redevelopment or conversion of existing serviced accommodation to other uses will not be permitted within the zones’.

The application is also in conflict with section 4.4.5.2, LDP: ‘It is also important that the loss of hotels is resisted’.

It is clear that the application must be refused as it is in direct conflict with the LDP.

Kind regards,

Janet Finch-Saunders MS/AS

