Ceredigion

Replacement Local Development Plan 2018 - 2033

Topic Paper: Tourism

Update for Preferred Strategy 2019



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Note for Reader

The update Topic Papers for the Local Development Plan (LDP) Deposit were published at the same time (December 2010) and are still available on the Council website or in paper copy by request.

The purpose of this draft Working Document Update is to demonstrate whether, since the LDP was adopted in April 2013, there has been any change in relevant guidance, policies or strategies; information and evidence; or issues highlighted through the Annual Monitoring Report (AMR) or appeals; that suggests the issues addressed in the adopted LDP have changed or are not fully being addressed by the policies and need to be considered in preparation of the Revised LDP Preferred Strategy.

Each topic paper will provide a summary table of any issues raised since the Deposit and whether these trigger the need for further investigation as to whether a change is required as part of the LDP review, or further explanation as to why a change is not required. If there is further discussion required this will be incorporated within the update paper.

1. Executive Summary

- 1.1.1 The purpose of this paper is to explore Tourism in Ceredigion. It considers policy and local context, key issues and existing Local Development Plan Policies in the formulation of appropriate tourism objectives, policies and monitoring framework to be included in the LDP review.
- 1.1.2 Tourism is a substantial sector of the region's economy spreading employment and income across Ceredigion. This is recognised in the emerging work programmes flowing from the 'Growing Mid Wales', agenda which will provide a focus on key priorities for tourism affecting Ceredigion for the next fifteen years, built on a sense of 'place'. This approach is consistent with the Well-being agenda and Ceredigion's own Well-being plan and takes account of Destination Management Planning for tourism throughout Mid Wales.
- 1.1.3 The Ceredigion Destination Management Plan (CDMP) 2013-20 identifies at section 8a the Ceredigion tourism product. It describes in particular the quality and opportunity offered by Ceredigion's coastal area as well as the potential to create attractive packages for themed user access. Themes focus around the natural and built environment across the county for events and outdoor activity, food and drink, industrial and maritime heritage, faith, music, arts and crafts, literature and language. Tourism packages are therefore focused on the places in Ceredigion where these assets can be found, delivering an authentic 'sense of place' experience.
- 1.1.4 Themed tourism is thereby spatially identifiable, enabling recognition in planning terms for creating community resilience through place making and protection of the tourism assets.
- 1.1.5 The key findings of this paper in regard to Tourism are:
 - a. Day visitors dominate the tourist market in Ceredigion;
 - b. The large majority of attractions in Ceredigion are associated with the area's landscape, history, heritage and culture, few of which are of a scale to become attractions in their own right. This is coupled with their

- use being influenced by seasonality and the weather. Any new developments therefore should celebrate Ceredigion's assets whilst being sympathetic to their surroundings and not detrimentally impacting on their environment;
- c. Tourism destination management planning and in particular, 'Growing Mid Wales' should inform the spatial focus of tourism planning policy. This could be achieved by reference to 'Growing Mid Wales' and its successor documents as the strategic focus for tourism planning policy, positively acknowledging investment intentions in priority destinations while protecting the characteristics of the assets which make them distinctive and valued for their tourism appeal and their potential to contribute to community well-being and resilience.
- d. Added reference to cultural/heritage assets in the tourism objective would better reflect Well-being goals for Ceredigion, though existing policies for tourism and development management generally address both positive response and appropriate protections.
- e. Proposals for changes of use (away from tourism) need careful consideration, especially if they would result in loss of important local facilities. Changes of use from tourist accommodation in the form of static caravans, chalets or cabins to permanent residential accommodation are generally to be resisted;
- f. Existing LDP policy could be improved in a few respects. This paper proposes:
 - o options for reviewing the definition of the Coastal Area
 - taking account of the latest tourism trends, e.g. glamping
- g. In addition to the existing Tourism policies, general development management policies apply and are generally considered to be fit for purpose (DM01, DM03, DM04, DM06, DM10 and DM17 in particular). In respect of Tourism, these policies should be the subject of a statement of common ground that they should not be revisited in terms of the Preferred Strategy for LDP 2.

2. Introduction

- 2.1.1 The Tourism Topic Paper (December 2011) considered the role tourism has to play in Ceredigion in terms of known current tourism needs, current tourist elements in place and opportunities that exist for tourism development.
- 2.1.2 This information was then used to determine the key issues which could be addressed by the LDP, tourism objectives and finally in the development of policies.

2.2 Background to LDP review

2.2.1 The findings of the 3rd Annual Monitoring Report of the Local Development Plan triggered plan review and informed the completion of the LDP Review Report published in November 2017.

2.3 Role of this paper

2.3.1 This paper looks at what has changed since the original Tourism Topic Paper was released in 2011 and whether a more detailed update is required to discuss any issues raised. If so the more detailed update will be incorporated within this paper.

3. Update table

3.1.1 The table below provides a summary of changes that have occurred or issues that have been raised in relation to Tourism.

These may be from changes in/new Policies, Strategies etc., changes in/new evidence or information or issues raised in the AMR or appeals.

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
AMR reports	Performance of	2014,	No further	SA Objective 8a – Promote, develop and improve	No
	AMR Indicator	2015,	investigation	opportunities for sustainable and environmentally	
	8a	2016, 2017	required.	friendly tourism, leisure and recreation facilities within	
		and 2018		Ceredigion has been monitored annually since plan	
				adoption as part of the Annual Monitoring Report. This	
				indicator has been assessed as 0 – Targets are not	
				being achieved but there are no concerns over	
				implementation of polices in 2014, 2015, 2016, 2017 and	
				2018. The 2018 AMR concluded that whilst there had	
				been a notable drop in numbers for staying visitors	
				(according to the 2016 STEAM report), this did not	
				appear to be Ceredigion specific. The Plan had had little	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				effect on tourist numbers and that overall the year by	
				year changes were neutral. The suite of tourism polices	
				in the LDP were considered to support the objective and	
				remained fit for purpose.	
New	Mobile Homes	2013	Possibly	The Act acknowledges and allows that some people	Possibly
legislation	(Wales) Act			choose to make their homes on residential parks. It is	
				designed to help improve regulation of the industry, so	
				that conditions on mobile home sites are improved and	
				the rights of residents are better protected.	
				It is mostly concerned with regulatory licensing, though	
				site layout 'Model Standards' are referred to, but not	
				combined into the Act.	
				Is the final paragraph of Policy LU14 fit for practical	
				purposes and in principle? Should we continue to not	
				permit changes of use to permanent residential use or	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				instead resist 'changes from Holiday to Residential' in	
				most cases with a criteria based element to policy?	
				Would it deal with 'location'; would it deal with 'scale';	
				would it make reference to layout/add to layout	
				considerations/landscape capacity implications for	
				licensed residential use?	
	Well-being of	April 2015	Further	In brief, this Act requires that all projects, policies and	Yes
	Future		consideration	plans consider economic, social, environmental and	
	Generations		required	cultural well-being of Wales in a way that accords with	
	(Wales) Act			the sustainable development principle.	
	2015				
				The Act puts in place 7 wellbeing goals:	
				A globally responsible wales	
				A prosperous Wales	
				A resilient Wales	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				A healthier Wales	
				A more equal Wales	
				A Wales of cohesive communities	
				A Wales of vibrant culture and thriving Welsh Language	
				The goals most relevant to Tourism are a prosperous	
				Wales (Tourism is key to employment) and a Wales of	
				vibrant culture and thriving Welsh Language (protection	
				of culture and heritage as a means to generate tourism	
				opportunities).	
				These goals are somewhat reinforced through the	
				existing policies within the LDP. LDP Objectives	
				(Objectives 2 & 4) and policies may need refinement to	
				address the goals.	
New	Planning	July 2015	No further	The Act sets out a series of legislative changes to	No.

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
Legislation	(Wales) Act		investigation	deliver reform of the planning system in Wales, to	
			required.	ensure that it is fair, resilient and enables development.	
				The act is complemented by existing and proposed	
				changes to secondary legislation, policy and guidance. It	
				provides opportunities to protect and enhance important	
				natural environments.	
New	PPW 10	December	Further	This is a complete revision of national planning policy –	Yes
Legislation		2018	investigation	national planning response to WBFGA Goals, with	
			required.	emphasis on place making. The main implications are:	
				'Planning authorities should provide a framework for	
				maintaining and developing well-located, well designed,	
				good quality tourism facilities. They should consider the	
				scale and broad distribution of existing and proposed	
				tourist attractions and enable complementary	
				developments such as accommodation and access to be	
				provided in ways which limit negative environmental	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				impacts as well as consider the opportunities to enhance	
				biodiversity' p85.	
				Temporary forms of development may not have adverse	
				impacts on coastal characteristics or coastal change yet	
				offer an opportunity to facilitate tourism based activities.	
				Care is needed, however, to ensure risks such as	
				flooding can be acceptably managed, particularly for	
				sensitive uses where occupants may reasonably expect	
				to be safe from coastal risksPreserving the resilience	
				of such environments should be given appropriate	
				consideration.p144.	
New	Environment	March	No further	The act puts in place legislation needed to plan and	No.
Legislation	(Wales) Act.	2016	investigation	manage Wales natural resources in a more proactive,	
			required.	sustainable and joined up way. It enables us to:	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				Approach environmental challenges presented and	
				focus on the opportunities our resources provide;	
				Establish statutory emission reduction targets and	
				carbon budgeting to support their delivery;	
				Improve waste management processes; and	
				Clarify the law for environmental regulatory regimes	
				including shellfisheries management, marine	
				licensing, flood risk management and land drainage.	
	NRW Mid	Emerging	Keep a	The aim of the emerging statement is to identify the	Possibly
	Wales Area		watching brief	benefits (ecosystem services) provided by our natural	
	Statement		for emerging	resources.	
			drafts		
				The NRW will work with others to identify how the Area	
				Statement can address key National Priorities for taking	
				action to both tackle the challenges and realise the	
				opportunities to better manage Mid Wales's natural	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				resources. The emerging evidence base and analysis of national priorities will be of practical use and policy context for the LDP in respect of tourism, if timely for plan preparation.	
New	Historic	2016	Further	The Act, as well as giving more effective protection to	Yes
Legislation	Environment		investigation	listed buildings and scheduled ancient monuments and	
	(Wales) Act		required	introducing greater transparency and accountability into	
				decisions taken on the historic environment, also	
				improves the sustainable management of the historic	
				environment, making Wales a leading nation in	
				protecting and enhancing our heritage assets. There are	
				several heritage projects which will bring wider socio-	
				economic benefits to the Mid Wales area, particularly to	
				Ceredigion, such as the proposed Heritage	

Review Issue/ Proposed Change	Source/ Trigger	Date (Month/ Year)	Action	Further comments	Review Topic Paper Required?
				Exploratorium in Lampeter being led by UWTSD, the renovation of Aberystwyth University's Old College and the proposed project at Strata Florida Centre, which is a nationally significant project. Checks should be made to ensure the LDP policies and allocations are fit for purpose in anticipation of any tourism developments associated with the historic environment – particularly in respect of any potential tourist accommodation and 'activity' 'spin out' developments.	
New PPW TAN	TAN 24: The Historic Environment	May 2017	Further investigation required	The new TAN provides specific guidance on how various aspects of the historic environment should be considered, including Scheduled monuments, Historic parks and gardens, Historic Landscapes and at Section 8 'Historic Assets of Special Local Interest'. In respect of the latter, it states that should a local authority wish to promote such an asset, the LDP should identify the	Yes

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				characteristics of the asset and include policies for their	
				preservation and enhancement. The TAN may have	
				particular relevance to tourism focus on specific historic	
				assets in the county. Consideration should be given to	
				the implications for LDP tourism policies or allocations in	
				these respects.	
Call for	Emerging NDF	2018	Keep a	This is a very important emerging document for	Possibly
Evidence	'Growing Mid		watching brief	informing tourism planning policies in Ceredigion. It	
	Wales'		for emerging	provides a Wales strategic overview of subject topics	
			drafts	under consideration for enhancing the Mid Wales	
				economy, referencing appropriate legislation and	
				enhancing the tourism offer of Mid Wales generally by	
				setting out a stall for adventure, coastal and heritage	
				tourism and supporting proposals to bring these	
				ambitions to fruition. At present the growth deal is still	
				being negotiated therefore firm plans are not available	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				but the LDP review will ensure no policies stifle these	
				future ambitions.	
New local non-	Ceredigion		Review LDP	The Ceredigion Local Well-being Plan is based on the	Yes
planning policy	Local Well-		objectives	guiding principles of community and individual resilience,	
documents	being Plan		and policy	setting out 6 well-being aims designed to be mutually	
	2018-2023		against the	supportive. In respect of tourism, the community	
	May 2018		local Well-	resilience aims are those with which the LDP objectives	
			being aims.	need to align. These are:	
				Enable communities to become prosperous,	
				sustainable and connected by supporting the	
				transformation of economic prospects.	
				 (Improve physical and digital infrastructure to 	
				support economic development)	
				Create conditions for communities to support	
				individuals from all backgrounds to live fulfilling,	
				independent lives	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				o (Development and sustaincultural and linguistic	
				opportunities)	
				Create environmentally responsible and safe	
				communities that can adapt and respond to the	
				effects of climate change	
				o (Support communities to enhance their relationship	
				with the natural environment and prepare for	
				extreme weather events.)	
Latest regional	Mid Wales	June 2011	No further	This strategy looks at regional issues and the most	No
tourism	Regional		investigation	effective way of dealing with them with regards to	
strategy for	Tourism		action	tourism. It is a high level strategic document and does	
Mid Wales	Strategy		required.	not contradict existing tourism policies in the LDP. This	
released.		\		will be superseded by Growing Mid Wales.	
Latest Welsh	The Welsh	June 2013	No further	This strategy is a high level strategic document that	No
Government	Government		investigation	provides a strategic focus for partnership working that	
Tourist	Strategy for		required.	will help to strengthen our competitive position and	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
Strategy	Tourism 2013 –			improve the performance of the tourism sector in Wales.	
released.	2020			In respect of land use implications, it emphasises	
	Partnership for			product development around distinctiveness of place	
	Growth			and destination management planning.	
				The Strategy is a high level strategic document with a spatial component informing future tourism priorities though it does not contradict existing tourism policies in	
Most recent	Tourism &	June 2011	No further	the LDP. This is the current tourism strategy for Ceredigion and	No
Ceredigion	Visitor		investigation	reviews the evidence at time of publication with regards	
Tourism	Economy		required.	to the current situation. This strategy identifies four	
Strategy	Strategy for			strategic objectives to drive activity and shape priorities	
	Ceredigion			over 5-10 years. These are:	
	2011- 2020			To encourage more visitors to Ceredigion,	
				To invest in a quality product and skilled tourism	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				workforce, and	
				To adopt realistic performance indicators for Tourism.	
				The Strategy is a high level strategic document and	
				does not contradict existing tourism policies in the LDP.	
				It notes the emerging LDP seeks to support sustainable	
				development of tourism but limiting further development	
				of caravans on the coast.	
Ceredigion	Ceredigion	2013	Further	Of particular relevance to land use planning, section 8a	Yes.
Destination	Destination		investigation	of this document draws out priorities for focused tourism	
Management	Management		required.	product development and packaging, naming and	
Plan released	Plan			identifying Ceredigion's natural and cultural assets, as	
	Ceredigion			well as promoting off-peak and all weather tourism	
	2013-2020			opportunities, of which there is a gap in provision in the	
				county currently. The LDP policies should be revisited	
				with this specific section in mind, to assess whether they	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				are likely to provide a positive and effective development	
				management context for the tourism ambitions set out in	
				the document.	
Ceredigion	Ceredigion for	June 2015	Further	The aim of the Strategy is to address some of the key	,
Regeneration	All: Our		investigation	challenges evident within the county. The strategic	
Strategy	Livelihoods,		required.	objective (C) 'Making the Most of Our Culture &	
released.	Our Economic			Heritage', which seeks to increase the number of sites	
	Regeneration			where culture and heritage can be accessed, the	
	Strategy 2014-			number of people accessing them and the number of	
	2020			businesses associated with them. LDP development	
				management policies are largely consistent with careful	
				management of development for tourism which might	
				impact on heritage sites. It may be appropriate to make	
				reference in policy, to strategic tourism growth priorities	
				identified in 'Growing Mid Wales' and inheritor	
				documents under which appropriate development can	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				be acknowledged.	
	Wales Tourism	September	No action	This survey measures the performance of	No
	Accommodation	2016	required.	accommodation sectors across the country, gathering	
	Occupancy			data from a variety of businesses on a monthly basis.	
	Survey			The data does not highlight any significant changes in	
				occupancy rates with the exception of static	
				caravan/holiday homes (coastal) rates up 26% over the	
				last 2 years and static caravan/holiday homes (inland)	
				down by 10%.	
				Whilst this survey provides some useful statistics	
				Tourism advised that the dataset was not relevant for	
				Ceredigion and that Occupancy should be considered	
				from the Bedstock survey only.	
	Ceredigion and		Further	The headline Bedstock figures for the year 2015 stand	Yes
	Powys		consideration	as follows.	

Review Issue/	Source/	Date	Action	Further con	nments			Review
Proposed	Trigger	(Month/						Topic
Change		Year)						Paper
				. 4				Required?
	Bedstock		required					
	Survey 2015-16							
	Project Plan							
	Report							
							_	
				Ceredigion I	Bedstock survey 2	2015 Prelimina	ary figures	
					No.		%	
				Sector	Establishments	Bedspaces	Bedspaces	
				Caravan				1
				and	165	22869	71.15%	
				camping				

Review Issue/ Proposed Change	Source/ Trigger	Date (Month/ Year)	Action	Further cor	nments			Review Topic Paper Required?
				Hostels/ group	21	2856	8.79%	
				Self- catering	662	3732	11.49%	
				Serviced	264	2910	8.96%	
				Alternative	18	112	0.34%	-
				Total		32479	100%	_
Latest STEAM	STEAM Report	2017	Further Policy	The most re	cently available 2	.017 STEAM	M report	Yes
Report	2017		consideration	supports sin	nilar conclusions	to the 2016	report, showing	
released.			required.	a further 2%	drop in staying v	visitors, but	a small (0.9%)	
				overall incre	ease in visitors for	2017 comp	pared with 2016.	
				Results:				
				2.74 million	Visitors in total (u	ıp 0.9% on :	2016),	
				comprising:				
				• 1.21 milli	ion Staying Visito	rs (-2% on 2	2016), including:	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				194,760 Visitors in Serviced Accommodation (up 4%)	
				on 2016)	
				897,950 Visitors in Non-serviced Accommodation (-	
				1.7% on 2016)	
				114,520 Visitors staying with Friends or Relatives (-	
				0.7% on 2016)	
				and	
				1.53 million day visitors (up 3.3% on 2016)	
				However, the further reduction in staying visitors may be	
				reason for examining changes in accommodation	
				products and whether these are catered for by current	
				LDP tourism objectives and policies. Priority for planning	
				is to increase the number of staying visitors as there is	
				still too large a proportion of day trippers/lower value	
				visitors to Ceredigion.	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
Policy	Development	Ongoing	Further Policy	Meetings with Development Management Officers and	Yes
Implementatio	Management		consideration	the Tourism Manager in January 2017 identified some	
n and usage	Officers		required	policy implementation and usage issues around inland	
				locational requirements (Policy LU14), 'wet and wild'	
				type facilities (Policy LU17) and alternative	
				accommodation (i.e. Glamping. Consider Policy issues	
				raised and amend polices accordingly.	
				In terms of large scale leisure/ recreation proposals. It	
				will be consistent with strategic tourism policy to	
				welcome such proposals and the potential for a high	
				profile tourism experience currently absent in	
				Ceredigion. Policy LU17 and the range of DM policies	
				for the protection of natural and heritage assets, access	
				and trip generation, would seem to be adequate to deal	
				positively and constructively with such proposals.	
				In addition, need to look at:	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				Recent appeal decisions which suggest that a high	
				standard of evidence/justification of need and of design	
				of proposal would be needed to contravene the existing	
				TAN6 and local LU14 tourism policy. It may be	
				appropriate to consider addition of minor clarification to	
				justify not permitting tourism accommodation proposals	
				within domestic curtilages for ease of decision making,	
				but only if it is felt appropriate.	
				Alternatively, in the context of a need for policy on	
				'glamping', other LAs have created policy explaining how	
				development or land use of a 'temporary' nature' may be	
				appropriate in certain locations where more permanent	
				tourism developments may not. Further consideration	
				may be given to allow for a similar development by way	
				of tourism policy criteria and a clear definition for	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change	Ye	Year)	Year)		Paper
					Required?
				planning purposes in Ceredigion of a 'temporary	
				structure' in respect of tourist accommodation'. The	
				Ceredigion DM convention currently relies on the Oxford	
				dictionary definition of a tent, viz., 'a portable shelter	
				made of cloth, supported by one or more poles and	
				stretched tight by cords or loops attached to pegs driven	
				into the ground' and based on legal advice, that a	
				camping pod would fall within the legal definition of a	
				caravan rather than a tent.	
				Moving forward it may be worth considering whether the	
				authority's view on camping pods should differ from that	
				of caravans. Some authorities, including the Lake	
				District National Park have taken the view that such	
			7	pods are capable of being relatively unobtrusive	
				compared to caravans (and indeed brightly coloured	
				tents) in woodland areas. There is scope to consider a	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				whole range of structures in more detail in an SPG,	
				reflecting the burgeoning variety of structures in	
				glamping proposals, but policy may usefully provide an	
				over-arching distinction between 'land use only' and	
				'operational development' of both a temporary and	
				permanent nature with regard to habitable tourism	
				accommodation and diverse impacts which make them	
				more or less suitable for some locations than others.	
				Monmouth have a very useful and interesting SPG	
				which may assist in terms of a fresh approach to the	
				changing trends.	
Member	LDP Working	ongoing	Further Policy	LDP Working group issues raised:	Yes
Involvement	group		consideration		
	discussions		required.	Coastal vs non-coastal defined by the main road.	
				The use of the A487 to define the coastal area in	
				Ceredigion for tourism policy purposes is a historical	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				policy parameter. There is a case to be made for an	
				evidential basis for the definition of the coastal area.	
				With the advent of landscape capacity assessment	
				methodologies it may be appropriate to re-examine the	
				definition.	
			\ \	Options for discussion in relation to a proposed	
				landscape capacity assessment exercise may include:	
				Test the appropriateness of the boundary line of the	
				A487 against the boundaries of Landmap Character	
				areas	
				Consider and test (landscape capacity assessment) a	
				bandwidth area parallel to the coast to a distance equal	
				to the widest parallel between the coast and the A487	
				Broaden the landscape capacity assessment exercise to	
				the coast and river valley SLAs and apply policy for	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				appropriate development to appropriate locations as per	
				PNCP caravan capacity assessment method, but	
				consider Monmouth guide for 'temporary' tourism	
				impacts as part of the method	
				As above but undertake the exercise for the whole	
				county	
				Such an exercise would enable the LDP, with further	
				detail in associated SPG, to offer advice and guidance to	
				tourism developers as to what type of tourism	
				accommodation development or use might be	
				appropriate in which areas/at which locations in the case	
				of heritage/built environment related proposals	
				Alternatively, involving fewer resources of time and	
				finances, the existing policy could be varied with a	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				requirement for a LVIA for proposals close to the coast	
				but not within the boundary as currently defined.	
Member	LDP Working	March	No further	Holiday lets should be able to be converted into	No
Involvement	group	2017	consideration	affordable rental accommodation if they are no longer	
	discussions		required	being used for holiday lets.	
				Unfortunately, the conversion of underused holiday	
				cottages to affordable rental accommodation is likely to	
				tend towards housing the most vulnerable residents in	
				the least accessible locations, remote from services and	
				subject to costly and/or poor transport links to meet	
				everyday needs, access to schools and employment etc.	
Press	From Summit to	November	Further Policy	Summit to Sea (O'r Mynydd i'r Môr in Welsh) is an	Yes
	Sea initiative	2018	consideration	initiative to restore flourishing ecosystems and a resilient	
			required.	local economy, on a scale never before seen in Britain.	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				A successful bid to the Endangered Landscapes	
				Programme means that £3.4 million of funding is	
				secured for Summit to Sea over five years.	
				The project will bring together one continuous, nature-	
				rich area, stretching from the Pumlumon massif – down	
				through wooded valleys to the Dyfi estuary and out into	
				Cardigan Bay.Within five years it will comprise at least	
				10,000 hectares of land and 28,400 hectares of sea.	
				Summit to Sea will involve:	
				 restoring natural processes that provide the 	
				ecological functions on which we all depend	
				 bringing communities together to create a shared 	
				vision for the future	
			7	supporting the local economy to diversify and	
				establish new nature-based enterprises.	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				The project would appear to be consistent with aims of	
				the Well-being Plan and with the Ceredigion Tourism	
				Strategy and Destination Management Plan. The	
				publicity for this funded scheme suggests it may involve	
				the creation of an interpretation centre at Maesnant,	
				close to Nantymoch Reservoir. Consideration should be	
				given to contacting the steering group for the project to	
			7	ascertain the extent of any land use issues associated	
				with the project, to include specific proposals and wider	
				ambitions.	
Airbnb impact	New tourism		No further	No evidence of the impact of this in Ceredigion as yet.	No
on tourism in	trends		action at this	E.g. whole houses or rooms? (Academic research	
Ceredigion			time	shows disproportionate Airbnb room rental among non-	
				owners/renters of property: whole house renting in more	
				affluent areas - London). In Scotland and elsewhere, a	
				decision has been made to limit the number of days	

Review Issue/	Source/	Date	Action	Further comments	Review
Proposed	Trigger	(Month/			Topic
Change		Year)			Paper
					Required?
				Airbnb can be utilised without planning permission. It is	
				sensible to keep the situation under review to identify	
				any areas that are being negatively impacted by such	
				trends.	

4. Local Context

Background

- 4.1.1 The Topic Papers written at Preferred Strategy and Deposit for the LDP 2007-2022 set out more detail in relation to Tourism within the County. That detail remains relevant and is not therefore repeated here. However, the following section summarises how information in the original 2010 Topic Paper influenced the content and production of the current LDP.
- 4.1.2 From the evidence base, a number of issues were identified that might be addressed, at least in part, by the LDP. These were:
 - a. Encouragement and development of sustainable tourism;
 - b. Promotion of the County as a year round holiday destination;
 - c. Retention of existing hotels, guesthouses and bed and breakfast establishments;
 - d. An increase in self-catering provision and whether there was now an overabundance;
 - e. Balance of tourism accommodation available;
 - f. Continuing and possibly extending the embargo in relation to caravan sites;
 - g. Encouraging access via means other than private transport and any possible associated problems within this;
 - h. Opportunities for dining out;
 - i. Allowing development whilst protecting the natural environment; and
 - Delivery of regional/local strategies.
- 4.1.3 These issues were researched and then drawn into the Key Issues and Objectives, and then addressed where possible, within LDP Policies.

Current Position

4.1.4 The LDP was adopted in April 2013; 5 Annual Monitoring Reviews have been completed, the Statutory Review Report was completed and published in November 2017 and the Delivery Agreement confirmed in June 2018.
Work on a Replacement Plan has commenced. This Topic Paper update is being undertaken as part of preparation for the Preferred Strategy for the Replacement Plan.

5. Review Issues (Triggers)

5.1.1 Table 1 in Section 3 summarises the analysis of the AMR, new/updated legislation/guidance/policy and new/updated evidence that have occurred or issues that have been raised in relation to Tourism. Where new information requires further consideration more information is provided below.

Legislation and Policy Changes Mobile Homes (Wales) Act 2013

- 6.1.1 The Act is designed to help improve regulation of the industry, so that conditions on mobile home sites are improved and the rights of residents are better protected. It is mostly concerned with regulatory licensing, though site layout 'Model Standards' are referred to, but not combined into the Act.
- 6.1.2 The final paragraph of Policy LU14 makes it clear that residential conversions would not be appropriate for existing holiday sites. This is because they were not designed for residential occupation as they have insufficient parking and amenity space and are often located in less than sustainable locations.
- 6.1.3 We should therefore continue to resist 'changes from Holiday to Residential' in most cases. It is recognised by service providers such as care and repair schemes that it can be more difficult to achieve adaptations of premises in park homes in the event of infirmness and disability than it is in conventional homes. However, given the recognition by Welsh government that these can be the choice of home for some people, would it be appropriate to introduce a new policy which would deal with proposals for mobile homes in terms of 'location'; 'scale' layout and landscape capacity for licensed residential use?

Well-being of Future Generations (Wales) Act 2015 and Ceredigion Local Well-being Plan 2018-2023 –May2018

- 6.1.4 This Act now requires that all projects, policies and plans consider the four pillars of sustainability – the social, economic, environmental and cultural well-being of Wales.
- 6.1.5 This Act looks at the long-term goals and makes public bodies recognise the importance of working together with people and communities to create a more joined-up approach and limit problems. It puts in place the 'sustainable development principle' that considers that: "the body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs."
- 6.1.6 There are seven well-being goals established:

A prosperous Wales

A resilient Wales

A healthier Wales

A more equal Wales

A Wales of cohesive communities

A Wales of vibrant culture and thriving Welsh Language

A globally responsible Wales

6.1.7 These goals are somewhat reinforced through the existing LDP objectives and policies. The LDP review background paper Local Development Plan and Wellbeing considered in detail how well the existing LDP objectives relate to the national well-being goals. LDP objectives 2 and 4 were considered most relevant. The LDP objective relevant to tourism is Objective 4 gives specific expression to fulfil objective 2 in terms of tourism focus, that is - to encourage and promote a year round sustainable, environmentally friendly tourism sector throughout Ceredigion that is supported by a good accommodation base that caters for a wide range of markets and provides a range of facilities for all seasons. The LDP review paper therefore appraised LDP objective 4 against contemporaneous emerging local well-being

objectives. It concluded overall that Objective 4 be reworded to embrace wellbeing and allow development in future to consider the Well-being goals in an appropriate manner. It made specific recommendations for rewording Objective 4 of the LDP. However, the LDP review background paper worked on the consultation draft of the local well-being plan which has subsequently been superseded by The Ceredigion Local Well-being Plan 2018-2023 published in May 2018, in which well-being 'objectives' have been transparently transformed into well-being 'Aims'.

- 6.1.8 In the light of this, the specific suggestions for rewording in the Local Development Plan and Wellbeing paper are rejected and this update of the Topic Paper has re-appraised LDP objective 4 against both the national wellbeing goals and against the published Ceredigion Local Well-being Plan 2018-2023.
- 6.1.9 A reappraisal against national well-being goals would suggest the following:

Key	
Well-being Goal Achieved	
Well-being Goal would improve LDP objective	
Well-being Goal not met by LDP objective	
Well-being Goal not relevant to LDP objective	

	National	Α	Α	Α	Α	A Wales of	A Wales	A Globally
	Well-	Prosperous	Resilient	Healthier	More	Cohesive	of Vibrant	Responsible
	being	Wales	Wales	Wales	Equal	Communities	Culture	Wales
	Goal				Wales		and	
							Thriving	
							Welsh	
							Language	
LDP								
Objective								
4								

6.1.10 This assessment diverges in some respects from that in the LDP Review paper. Performance of the LDP objective against 'A More Equal Wales' has

- been assessed as green because, as worded, it supports equality for rural communities in terms of economic well-being. In respect of 'A Wales of Cohesive Communities' Objective 4 has been assessed as green since the tourism objective is likely to impact on attractiveness and viability of communities, quoted as relevant to the meaning of 'cohesive communities'.
- 6.1.11 In respect of 'A Wales of Vibrant Culture and Thriving Welsh Language', the assessment is yellow. There is no reference to cultural tourism in Objective 4 as currently written. As discussed further below, this goal is at the heart of practical recommendations in tourism strategies at Wales, Mid Wales and Ceredigion levels. It should be reflected in LDP Objective 4 alongside mention of the environment, particularly because it encompasses the clear geographical identification of 'place' where natural and cultural assets can be found. Land use planning policies under such an objective in the LDP can be appraised for the extent to which they can positively address potential place-based issues, providing positive development management of the assets upon which tourism can be developed.
- 6.1.12 Finally, in respect of 'A Globally Responsible Wales', it is assumed, following Agenda 21 principles, that satisfying all the other goals adds up to satisfying this goal on the basis of 'think global, act local'.
- 6.1.13 The Ceredigion Local Well-being Plan 2018-2023 is based on the guiding principles of community and individual resilience, setting out 6 well-being aims designed to be mutually supportive. In respect of tourism, the community resilience aims are those with which the LDP objectives need to align. Relevant extracts where these coincide with LDP Objective 4 are:
 - Enable communities to become prosperous, sustainable and connected by supporting the transformation of economic prospects.
 - (Improve physical and digital infrastructure to support economic development.....)
 - Create conditions for communities to support individuals from all backgrounds to live fulfilling, independent lives
 - o (Develop and sustain.....cultural and linguistic opportunities.....)

- Create environmentally responsible and safe communities that can adapt and respond to the effects of climate change
 - (Support communities to enhance their relationship with the natural environment)

Planning Policy Wales 10, December 2018

6.1.14 This is a complete revision of national planning policy – national planning response to WBFGA Goals, with emphasis on placemaking. No further consideration of policy is required other than to ensure that the correct national guidance is quoted in the policies. Adjustments based on a review against WBFGA goals has obviated the need for examination of policy substance in the light of this latest national policy guidance.

Historic Environment (Wales) Act 2016

6.1.15 The Act, as well as giving more effective protection to listed buildings and scheduled ancient monuments and introducing greater transparency and accountability into decisions taken on the historic environment, also improves the sustainable management of the historic environment, making Wales a leading nation in protecting and enhancing our heritage assets. There are several heritage projects which will bring wider socio-economic benefits to the Mid Wales area, particularly to Ceredigion, such as the proposed Heritage Exploratorium in Lampeter being led by UWTSD, the renovation of Aberystwyth University's Old College and the proposed project at Strata Florida Centre, which is a nationally significant project. Checks should be made to ensure the LDP policies and allocations are fit for purpose in anticipation of any tourism developments associated with the historic environment – particularly in respect of any potential tourist accommodation and 'activity' 'spin out' developments.

TAN 24: The Historic Environment - May 2017

6.1.16 The new TAN provides specific guidance on how various aspects of the historic environment should be considered, including Scheduled monuments,

Historic parks and gardens, Historic Landscapes and at Section 8 'Historic Assets of Special Local Interest'. In respect of the latter, it states that should a local authority wish to promote such an asset, the LDP should identify the characteristics of the asset and include policies for their preservation and enhancement. The TAN may have particular relevance to tourism focus on specific historic assets in the county. Consideration should be given to the implications for LDP tourism policies or allocations in these respects.

Ceredigion Destination Management Plan (CDMP) - Ceredigion 2013-2020.

Growing Mid Wales, emerging document October 2018

6.1.17 Of particular relevance to land use planning, section 8a of the CDMP document draws out priorities for focused tourism product development and packaging, naming and identifying Ceredigion's natural and cultural assets, as well as promoting off-peak and all weather tourism opportunities, of which there is a gap in provision in the county currently. The strategic tourism priorities will be further refined in the emerging 'Growing Mid Wales' document and its successor documents. The LDP policies should be revisited with these documents in mind, to assess whether they are likely to provide a positive, effective and sustainable development management context for the tourism ambitions set out in them.

Ceredigion for All: Our Livelihoods, Our Economic Regeneration Strategy 2014-2020 - June 2015

6.1.18 The aim of the Strategy is to address some of the key challenges evident within the county. The strategic objective (C) 'Making the Most of Our Culture & Heritage', which seeks to increase the number of sites where culture and heritage can be accessed, the number of people accessing them and the number of businesses associated with them, suggests that LDP policies should be re-examined to ensure positive but sensitive management of development for tourism which might impact on heritage sites. This may involve identifying the source of character information against which sensitive mitigation can be directed.

7. Evidence

7.1.1 Since the LDP went on deposit, the following evidence is considered relevant to the review of the LDP:

STEAM Report 2017

7.1.2 The most recently available STEAM report, for 2017, shows, following a drop observed in the 2016 report, a further 2% drop in the number of staying visitors, but a small (0.9%) overall increase in visitor numbers for 2017 compared with 2016, bringing a slight percentage increase (0.6%) in economic impact.

7.1.3 Results:

- 2.74 million Visitors in total (up 0.9% on 2016), comprising:
- 1.21 million Staying Visitors (-2% on 2016), including:
- 194,760 Visitors in Serviced Accommodation (up 4% on 2016)
- 897,950 Visitors in Non-serviced Accommodation (-1.7% on 2016)
- 114,520 Visitors staying with Friends or Relatives (-0.7% on 2016) and
- 1.53 million day visitors (up 3.3% on 2016)
- 7.1.4 The highest value per capita per day visitor at 2017 is the visitor who stays in serviced accommodation, with a daily average spend per head of approximately £80, compared with just under £40 per head per day spend by visitors staying in unserviced accommodation and just over £32 per head per day for day visitors.
- 7.1.5 The average stay in serviced accommodation is 2 days, but at almost double the economic value per head per day of the non-serviced sector, where average stay is about 6.5 days and accounts for the significant proportion of current visitor spend. Any increase in visitor numbers to the serviced accommodation sector, or an increase in length of stay, would have a relatively significant impact in economic terms. Improving the economic yield from tourism is an important priority in 'Growing Mid Wales'.

- 7.1.6 Overall, the LDP tourism objective and policies should be reviewed with the relative economic value of each sector in mind, to ensure that opportunities for an increased quality and range of tourist accommodation can come forward with a view to rebalancing the proportion of staying to day visitor and the proportion staying in higher yield accommodation as well as to overturn the current trend for an overall reduction in staying visitors. It can do this by examining trends/changes in accommodation products and whether these are catered for by the current LDP tourism objective and policies. ¹
- 7.1.7 A more detailed breakdown of visitor stays is provided in Ceredigion bedstock survey figures, with comparative information for Powys.

Ceredigion and Powys Bedstock Survey 2015 – 16.

Project Plan Report Ceredigion Bedstock Survey 2015 Preliminary figures and percentages compared with Powys

Sector	No. Establishments	Bedspaces	% Bedspaces	Comparative % Bedspaces in Powys
Caravan and camping	165	22869	71.15%	*68.53%
Hostels/ group	21	2856	8.79%	3.82%
Self-catering	662	3732	11.49%	11.02%
Serviced	264	2910	8.96%	16.24%
Alternative	18	112	0.34%	0.39%
Total	1130	32479	100%	100%

¹ Figures derived from STEAM Report 2017, figure at page 5, 'Distribution by Visitor Type'. Formula:[Economic impact / visitor number]/[average days stay per visitor] = average per capita per day spend (by sector).

- 7.1.8 The most recent bedstock information available as shown in the table above indicates that Ceredigion has a very limited number of bedspaces in the highest yield accommodation (about half that of Powys share) and a very small proportion of 'Alternative' bedspaces, suggesting that take up of newer trends such as 'glamping' may be relatively slow though the proportion of bedspaces in Powys is fairly similar.
- 7.1.9 Indeed, a historic comparison in the table below shows a decline in the proportion of 'alternative' bedspaces for Ceredigion from 2013. Numerically, Powys are closer to Ceredigion's total bedspace supply figure than to that in Pembrokeshire, which is three times higher than Ceredigion. However, whereas in 2013 Ceredigion had more than Powys (205 compared with 178²) and a similar number of bedspaces as Pembrokeshire (215), this number has declined substantially in 2015-16 to 112. This is in the context of a slight decline in Ceredigion's total bedspace figure from 2013 to 2015-16, with only the hostel and serviced sector experiencing a slight increase.



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Change in 2015-16 Ceredigion Bed Stock against 2013 baseline, with 2013 baseline context for neighbouring authorities (Wales Bed Stock Data, March 2013)

	2013 Wales Be				
	% sector distr				
Accommodation	Carmarthen	Pembroke	Powys	Ceredigion	Ceredigion
Sector	shire	shire			% Bed
					Spaces 2015-
					16
Caravan and	63.08%	71.86%	66.50%	71.44%	71.15%
camping					
Hostels/Group	4.40%	1.48%	4.20%	6.85%	8.79%
Self-Catering	14.83%	19.81%	13.81%	12.52%	11.49%
Serviced	15.69%	6.60%	15.05%	8.56%	8.96%
Alternative	2.00%	0.25%	0.44%	0.63%	0.34%
Total %	100%	100%	100%	100%	100%
Total bedspaces (numbers)	17595	99329	40389	32770	32479

^{*}Derived from source: https://gov.wales/statistics-and-research/accommodation-bedstock/?lang=en Table p4,

7.1.10 Journalistic review³ of the 'glamping' industry notes the growth of camping in all its forms, with the number of traditional camping and caravanning trips growing at the same time as the increase in glamping, with people choosing to spend more time outdoors overall. In England, the number of overnight trips doubled between 2015 and 2016, with glamping websites reporting a 50 per cent rise in glamping bookings. Trends are towards five star luxuries in the grounds of hotels or castles, or in some of the most remote and precious landscapes. Eco-friendly structures are giving holidaymakers access to protected landscapes where hotels would never get permission to build.

^{&#}x27;Number of Accommodation Bed Spaces by Category'

³ Telegraph, November 2018- https://www.telegraph.co.uk/travel/destinations/europe/united-kingdom/articles/the-rise-of-glamping

Experts believe that while access to wilderness afforded by glamping sites sets them apart from hotels, people will carry on glamping.

Policy implementation and usage

- 7.1.11 Discussions with Development Management Officers and Tourism staff raised issues in respect of glamping, relevant to the LDP review:
- 7.1.12 General Issues identified were as follows:
 - Consider introduction of a policy to cover accommodation not in the tent category (i.e. camping pods, yurts, shepherd's huts, gypsy caravans, domes, teepees/wigwams. These types of development are not tents because they have a base (i.e. decking). A policy which supports this type of development would be welcomed because it would bring more walkers/etc. This type of accommodation could be further supported by an SPG.
 - Careful consideration and wording of such a policy is needed to not enable the establishment of a tourism site which would then lead to further application for a manager's dwelling.
- 7.1.13 This type of tourism is often referred to as 'sustainable tourist accommodation'. Sustainable tourism is defined in the European Charter for Sustainable Tourism as 'Any form of development, management or tourist activity which ensures the long-term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.'
- 7.1.14 In view of this it is considered that sustainable tourism accommodation (glamping)
- 7.1.15 proposals should generally reflect the following key principles of sustainable tourism:
 - Generate benefits for the local economy (residents and visitors)

- Protect and enhance landscape character and natural/historic environment
- Scale and design appropriate to site context
- Locally adapted (recognising that sustainable accommodation solutions can be diverse/unique)
- · Generate minimal car trips
- Make use of renewable energy resources (energy efficient)
- Capable of being removed without leaving a permanent trace (including any associated supporting infrastructure)
- 7.1.16 All proposals for 'sustainable tourism' accommodation will be expected to accord with these key principles,
- 7.1.17 Discussions with Development Management Officers also raised issues in respect of individual policies.

Policy LU14:

- That Policy LU14 could generally be simplified and not as complicated.
- That there is an issue with LU14(d) Outside the coastal area change of use of touring pitches to static caravan pitches, cabins and chalets will not be permitted. Need to amend policy to include same wording as for in the coastal area.
 - [Disagree, so long as suggestion re LU14 (b) below is applied. This will consistently resist the encroachment of static caravans and allow for less permanent holiday accommodation, still inadequately catered for.]
- That LU14 (2) (iv) Tourism Needs and Development Impact
 Assessments should only be required for applications not in accordance with Policy rather than for all applications. i.e. if you tighten up location requirements then assessment may not be required for all applications.
- That in LU14 (2) tightening up is required for the location of new tourism development (especially inland). New tourism development should be adjacent or linked to an existing settlement. Inland holiday lets or tourism development should be in association with an existing dwelling/farm and

where retention would add to the character of the area. Wording should be amended to prevent brand new tourism sites in the open countryside that once approved led to pressure on a managers dwelling/associated permanent residential use.

o [Disagree: new tourism sites need to be sustainable, but the Tourism Needs and Development Impact Assessment is intended to establish this in respect of permanent development and it is dealt with in LU16 (3). However, since many forms of glamping are likely to have different locational experiences as part of their appeal and since most are likely to have different visual impacts from caravans, including touring caravans, as such, it may be appropriate to include a reference '(for glamping see LU16)' after 'accommodation' in LU14 2a.and to insist that only 'sustainable tourism' proposals should be acceptable outside USCs, RSCs and LSs, that is, those which meet all the 'key principles' of 'sustainable tourism'. This could be achieved by amending Policy LU16 criterion 3, deleting final 'and' and replacing with 'or 'glamping' proposals which meet all 7 key principles of sustainable tourism'. The 7 key principles should be provided in the Reasons. Given the final key principle, 'Capable of being removed without leaving a permanent trace (including any associated supporting infrastructure)', this would deal with concerns about pressure for a manager's dwelling and with issues of scale, sensitivity etc.

LU14(b)

- Extensions doesn't include touring sites.
 - [Agree these should be included at 2.b, which would make sense of the retention of 2.d.]

Policy LU15

• Policy is fit for purpose

Policy LU16

- Policy is fit for purpose in respect of existing hotels, guest houses and hostels. Tourism officers confirmed that there is a continued need for the protection of these.
- Policy states "In locations outside USCs, RSCs and LS encourage and support the conversion of existing buildings to other types of tourist accommodation provided that the buildings are structurally sound and will not require major external alterations." This policy suggests that in the most sustainable locations, we cannot approve conversions of existing buildings for tourist accommodation.
 - [Disagree –Criterion 3 follows criterion 2 which encourages development in the most sustainable locations – the point made here could be dealt with by deleting 'new' before 'hotels' in criterion 2 of LU16.]
- The initial description 'In terms of types of accommodation not covered by Policy LU14 including; hotels, guest houses, bed & breakfast and hostels'. Self catering accommodation should be added to this list.. It mentions self catering accommodation under 7.104 but not anywhere else.
 - [Agree that the wording in the first paragraph could be amended to: '...including; hotels, guest houses, bed and breakfast, hostels and self-catering cottages'. It would be reasonable to resist the change of use of self-catering cottages for reasons of retaining the supply of suitable all year round overnight stay accommodation, but also to avoid conversion to inadequate-standard residential accommodation.]

Policy LU17

- Reconsider wording of 7.107 to support 'wet/wild' type facilities. Some tourist facilities rely on out of centre locations because of their nature and reliance on the natural environment.
 - [Larger scale tourist attractions may take a wide variety of forms, so
 to begin to name them would be less flexible than setting out the

need for appropriate accessibility – which no doubt would also form part of the commercial consideration in any tourism development.]

Member Working Group

- Coastal versus non coastal caravan site development restrictions are inadequately justified by evidence to rely on a boundary formed by the A487 coastal Trunk road.
 - o For simplicity, the coastal A487T may continue to serve as an indicative boundary if criteria are additionally introduced into policy to allow some flexibility where it can be demonstrated through an Landscape Visual Impact Assessment that a proposal will not damage the landscape. Other, more onerous options are discussed in the conclusions at the end of the paper.
- Holiday use of single caravans within domestic curtilage.
 - Locating a single static caravan within a domestic curtilage is normally subject to its demonstrated need as ancillary to the main residence and to criteria optimising visual impact. These considerations would apply both within and without a coastal zone.
- Holiday lets should be able to be converted into affordable rental accommodation if they are no longer being used for holiday lets.
 - O As discussed in relation to policy LU16, there is evidence of a genuine need to offer suitable all year round tourist accommodation to promote staying visitor tourism. Also, tourist accommodation is of a lower standard requirement than permanent residential accommodation, The conversion of underused holiday cottages to affordable rental accommodation is likely to tend towards housing the most vulnerable residents in the least accessible locations, remote from services and subject to costly and/or poor transport links to meet everyday needs, access to schools and employment etc.

8. **New Initiatives**

From Summit to Sea - 2018

- 8.1.1 Summit to Sea (O'r Mynydd i'r Môr in Welsh) is an initiative to restore flourishing ecosystems and a resilient local economy, on a scale unprecedented in Britain.
- 8.1.2 A successful bid by the Cambridge Conservation Initiative (a unique collaboration between the University of Cambridge and leading internationally-focused biodiversity conservation organisations) to the privately funded Endangered Landscapes Programme, secured £3.4 million of funding for Summit to Sea over five years.
- 8.1.3 The project is intended to bring together one continuous, nature-rich area, stretching from the Pumlumon massif down through wooded valleys to the Dyfi estuary and out into Cardigan Bay. Within five years it will comprise at least 10,000 hectares of land and 28,400 hectares of sea.

8.1.4 Summit to Sea will involve:

- restoring natural processes that provide the ecological functions on which we all depend
- bringing communities together to create a shared vision for the future
- supporting the local economy to diversify and establish new naturebased enterprises.
- 8.1.5 The project would appear to be consistent with aims of the Well-being Plan and with the Ceredigion Tourism Strategy and Destination Management Plan. The publicity for this funded scheme suggests it may involve the creation of an interpretation centre at Maesnant, close to Nantymoch Reservoir.
- 8.1.6 Consideration should be given to contacting the steering group for the project to ascertain the extent of any land use issues associated with the project, to include specific proposals and wider ambitions.

9. Analysis (Options for addressing the Issue)

9.1.1 Key Issues arising from the literature review and engagement for the Preferred Strategy 2018 may be summarised as follows:

9.1.2 Any future policy needs to:

- Acknowledge natural, heritage and cultural assets identified by tourism
 destination management plans and in particular key tourism priorities in
 the emerging 'Growing Mid Wales' document their benefit to community
 well-being and the characteristics for which they need policy protection.
- Provide the means to assess the impacts of different tourism related development types on these identified characteristics using parameters such as: scale, permanence, infrastructure requirements, mode of access, trip generation
- Allow, mitigate or re-direct tourism development as appropriate so as to enable communities to become prosperous, sustainable and connected by supporting the transformation of economic prospects and the maintenance or enhancement of built and natural environmental assets.

9.1.3 Specifically policy needs to consider:

- Location of tourism assets natural, heritage and cultural; and the sources of information on their valued characteristics
- Type of development
 - o operational development versus use of land, (this relates to the degree of permanence of impact by virtue of the level of works arising from a proposal: a tree house 'glamping site' would be 'operational development' whereas a large tent on a removable decking base may be 'a use of land')
 - traditional tourist accommodation static and touring caravans,
 tents, holiday cottages, hostels, hotels (location, prevention of loss)
 - new trend accommodation 'sustainable' tourism glamping, wild camping

- D2 leisure use development theme parks, sports venues, linear infrastructure (dedicated cycle routes, etc), ancillary uses e.g. interpretation, education, workshops
- Service infrastructure and staff accommodation
- Informed recommendations for mitigating impacts of development/best practice references.
- Evidence-base for geographical boundaries referenced in policy.

10. Conclusions / Recommendations

- 10.1.1 This review has highlighted the importance of Well-being as the overriding focus for planning policy and the emerging 'Growing Mid Wales' document as the main contextual changes since the publication of the first Ceredigion LDP. It has further identified issues relating to the coastal zone for caravan site development and the new tourism trend for 'glamping'.
- 10.1.2 The response to the Well-being imperative may be achieved in different ways, taking account of resources and Welsh government advice that a revised Preferred Strategy should only deal with essential policy changes,
- 10.1.3 In general terms the key issues arising from this review are generally capable of being met by the existing Tourism policies, when taken into account alongside general development management policies, but it is useful to consider a range of options. The range of options identifies different approaches that may be incorporated in a revised Preferred Strategy and points to resource implications.

Do Nothing.

10.1.4 This is probably not a completely viable option given the latest policy context with its emphasis on Well-being and given a small number of identified weaknesses in existing LDP policies, in relation to changing tourism trends, in particular, glamping; and the evidence base for the use of the A487 to define the coastal boundary in respect of caravan site development.

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10.1.5 However the changes required may be considered to be minor and not requiring substantial material change to the way the policies are worded or used

Do the Maximum

- 10.1.6 It could be argued there is a need for a positive strategic spatial and qualitative planning policy framework for sustainable tourism based on placemaking and destination management planning for the well-being and resilience of Ceredigion communities. However, both time and budget resources would be a significant factor associated with this option.
- 10.1.7 In this scenario, there might be a change to the wording of Objective 4 as follows:
 - To encourage and promote a year round sustainable, friendly tourism sector directed by destination management planning, focussed on sensitive development of cultural and environmental assets throughout Ceredigion, supported by a good accommodation base that caters for a wide range of markets and which provides a range of facilities for all seasons.
- 10.1.8 There might then be a Strategic Tourism policy which provides positive support for spatially identified assets as destinations, for reasons of distinctive placemaking, the natural environment, culture or heritage, whilst protecting the characteristics of those assets which make them special or distinctive. This approach would comprehensively satisfy national and county well-being aims.
- 10.1.9 Some detailed considerations might be made for adjustments to policy in respect of glamping and more onerously in respect of defining the coastal area or re-examining the basis for impacts using a commissioned Landscape Capacity Assessment
- 10.1.10 These considerations would incorporate the following options:
 - Spatial policy approach using landscape capacity assessment study information

- Criteria based policy
- Parallel preparation of SPG
- 10.1.11 Plan preparation would need justified decisions on the geographical basis for landscape capacity assessment, choosing between:
 - Coastal SLA
 - Destination Management Planning areas and point locations
 - Coastal strip at Xm band width from coastline.
 - Landscape capacity assessment of the coastal and river valley SLAs
 - Landscape capacity assessment of the whole of the county

Do the Minimum

- 10.1.12 On the whole the Tourism Objective 4 and Tourism policies are fit for purpose and would be acceptable with some minor adaptations and a greater focus on glamping when applied alongside general Development Management policies which are considered to be fit for purpose (DM01, DM03, DM04, DM06, DM10 and DM17 in particular) in delivering a 'well-being' policy focus. In terms of the Preferred Strategy for LDP 2 these Development Management policies should be the subject of a statement of common ground that they should not be revisited in respect of Tourism.
- 10.1.13 In relation to the use of the A487 as a coastal area boundary, this may continue to serve as an indicative boundary if criteria are additionally introduced into policy to allow some flexibility where it can be demonstrated through a Landscape Visual Impact Assessment that a proposal will not damage the landscape.
- 10.1.14 'Do the minimum' option, with addition of some criteria to existing policies would therefore satisfy the Member and Development Management concerns, the Growing Mid Wales ambitions for tourism in Ceredigion and take account of the Well-being of Future Generations Act and is commended as a positive way forward for the LDP replacement document in respect of tourism.