

REPORT ON SECOND CONSULTATION UNDERTAKEN ON DRAFT PLACEMAKING GUIDANCE FOR THE GOWER AONB, 2021

Summary of Findings from Second Public Consultation Exercise

City & County of Swansea Council

September 2021

REPORT ON SECOND CONSULTATION UNDERTAKEN ON DRAFT SPG: PLACEMAKING GUIDANCE FOR THE GOWER AONB, 2021

Summary of Findings from Second Public Consultation Exercise

1. Introduction

- 1.1 In **July 2020**, the City & County of Swansea Council Planning Committee approved a draft version of the Gower Area of Outstanding Natural Beauty (AONB) Design Guide Supplementary Planning Guidance (SPG) for the purpose of public consultation.
- 1.2 A six week public consultation and engagement process was undertaken on the draft version of the SPG **between 4th September and 16th October 2020**¹.
- 1.3 In response to the comments received, and in order to ensure the document reflects the most up to date national planning guidance and policy (including Future Wales published in 2021), the SPG was subject to further amendments and re-named as '**Placemaking Guidance for the Gower AONB**', to reflect consistency with other SPG and in recognition of the placemaking agenda that forms the central theme of national planning guidance and the development plan. Due to the nature and extent of the amendments, the document was presented for a further period of public consultation **between 14th June and 5th September 2021**.
- 1.4 Face to face public engagement events were unable to occur due to constraints associated with Covid-19 restrictions. Nevertheless, the consultation involved a wide range of awareness raising and engagement activities, including:
 - Print media articles and social media notices before and during the consultation, including:
 - This Is Gower Facebook page – posted 23rd June 2021.
 - Swansea RDP Facebook page – posted 4th August 2021.
 - Swansea Council website and Facebook page – 6th August
 - AONB Steering Group – e-mail sent to 25 partners and active individuals on 13th August 2021.
 - AONB General Distribution List – e-mail sent to 86 individuals with an interest in Gower on 13th August 2021.
 - Websites: Wales247 and Swansea Bay News

¹ The closing date was extended to 26th October 2020 for two specific stakeholders due to an administrative error

- A specific web page created for the SPG that described the consultation, provided a weblink to the document, and a link to the comment form.
- Notification emails posted to a range of stakeholders, including Councillors

The consultation generated a range of responses from organisations and individuals, some of which were very detailed. These are set out below and includes responses received via email as well as the bespoke web survey.

On behalf of an organisation (4) <ul style="list-style-type: none"> • The Gower Society • Ilston Community Council • Glamorgan Gwent Archaeological Trust • Natural Resources Wales 	As an agent (e.g. planning consultant, architect) (3) <ul style="list-style-type: none"> • Hyde & Hyde • Raum • Pobl
As a member of the public (4)	<ul style="list-style-type: none"> • As a Ward Councillor (-)
As the owner of a business (-)	

1.5 All of the comments received have been recorded and evaluated². All comments have been categorised into issues/themes in the schedule in Section 2 of this report, and the Council's response provided within a separate column adjacent to each. In addition, the schedule outlines the changes proposed by the Council to the SPG document as a result.

1.6 This consultation report should be read in conjunction with the Initial Consultation Report, dated May 2021.

2. Schedule of Summarised Comments and Responses

2.1 The following schedule sets out, broken down for each part of the SPG document, the consultation comments raised categorised into issues/themes with the Council's response and the changes that are being proposed by the Council to the SPG document as a result. Page numbers/paragraph numbers are in reference to the consultation draft version of the document.

² One respondent provided two separate responses covering the same theme, and both of these have been recorded in this document.

SECTION 1: GENERAL QUESTION

Question 1: Do you think the links to the LDP and its policies are made sufficiently clear throughout the draft SPG?

If NO, please explain why:

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	Yes, the links to the LDP are clear.	Comment welcome.	No change

SECTION 2: QUESTIONS ON SPECIFIC SECTIONS, MODULES AND APPENDICES

Module 5A: Residential This module includes guidance on all scales of residential development, from extensions to individual dwellings to design principles for larger scale residential developments (N.B. proposals for new or amendments to existing residential chalets are exempt and covered in a separate module – see Question 4 below).

Question 2: *Do you consider Module 5A Residential to provide suitable guidance on the placemaking principles that should apply for the range of residential development proposals that could come forward within the Gower AONB?*

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	Please could the section in the previous Gower Design Guide saying that "modern vernacular dwelling styles could be appropriate in the AONB" be removed? In my view there have been several really ugly and incongruous glass-fronted boxes built along the cliffs between Pwll Du Head and Penmaen. They are more like office blocks suitable for an industrial estate rather than beautiful cliff tops or villages. It may	Section A1 of the document notes that there are contrasting approaches to designing in sensitive areas, including 'modern vernacular' and 'contemporary'. The design approach of a new dwelling will need to be fully justified in order to	No change.

	<p>be that these can be accommodated where they are hidden behind hedgerows or in hollows, but not in a cliff top or hillside location where they are visible for miles, or amongst more traditional dwellings</p>	<p>demonstrate that it is clear in its vision, of the highest design quality, sensitive to their surroundings and that the choice of materials in appropriate. The design is subject to a site and context appraisal of existing character; the Landscape Character and Settlement Statement (Appendix 5 & 6) should be reviewed in the process, to ensure new development integrates with existing local character and distinctiveness. It is therefore appropriate to include 'modern vernacular' as an appropriate design approach, subject to the above criteria.</p>	
Member of the public	<p>Thank you for sending me this. But I have learned that it is a waste of time and effort, however valid one's cause, when faced by power and money</p>	<p>Comment noted</p>	<p>No change proposed</p>
Raum	<p>A number of small aspects running through the documents (Llangennith/Llanmadoc titling in settlement statements, typos etc). Interested in the use of contemporary and modern vernacular on Gower which I recall there being a tightening on the wording.</p>	<p>Comments noted. Document will have a final edit. Contemporary and modern vernacular are discussed</p>	<p>Add text to paragraph A1.5: "Planning policy and guidance supports innovative and contemporary design when it is sensitive to its</p>

	<p>Generally a very comprehensive and useful set of documentation, interpretation often being the variable.</p> <p>Very pleased to see some Raum projects appear within, and we have a couple more now complete we thought more appropriate than others used (specifically the agricultural worker's dwelling at Weobley Castle).</p> <p>It might be useful to consider why a number of appeals have overturned decisions as often the reasons for refusal are wrong even if the decision is right (I'm not solely talking about our work here).</p>	<p>within the document. Section Policy position reflects that of the LDP. In line with TAN 12, innovative design approaches are welcomed, in appropriate locations, subject to a contextual analysis of the site and context.</p> <p>Images will be included within the final document.</p>	<p>location and setting. A contextual approach should not necessarily prohibit contemporary design. Instead, it will need to be demonstrated that a contextual design approach has been undertaken, using the character, setting and location".</p> <p>Add images of new rural enterprise dwelling (as supplied by Raum) in Module 5A.</p>
The Gower Society	<p>A.13: All of the glass box design examples in the last 10 years are poor on light spill. Shop windows with little attempt to prevent with curtains or blinds. Exhibitionism See West Cliff Pennard, Stormy Castle, above the new one at 3 cliffs, example at East Cliff etc</p>	<p>Light spill is an issue that we are attempting to address via Module I.</p>	<p>No change</p>
	<p>A.20 and A.38: Sorry but your stance on timber has often denied applicants longer lasting and just as appropriate use of high quality designed modern materials that can be sympathetic. We still think that in certain cases good quality plastic of correct design and colour can be successfully incorporated into a modern housing. Many people cannot afford high grade timber joinery that with modern paint systems does not last as good as the old lead paints. Certainly, the</p>	<p>A.20 relates to 'scale & size' of extensions & alterations. A.23 does however refer to the preference for timber construction of conservatories (A1.73) but notes that if other materials are to be considered, the design should be 'sensitive</p>	<p>No change.</p> <p>A1.73 typo to be corrected... <u>"...the design should be sensitive to the main building"</u>.</p>

	coloured aluminium clad timber is excellent. Agreed in listed buildings it is a big NO.	to the main building'. The use of uPVC (particularly white) should be avoided unless the context suggests otherwise. A.37-A.38 relates to window detailing. Again, the preference is for the use of sustainably sourced timber. This section sets out preferences but also acknowledges that other materials (uPVC, aluminium) may be appropriate subject to the host building and context.	
	A25. Not a good example of a porch in first image.	Noted.	No change
Hyde & Hyde	A.8: The document suggests that larger buildings should be designed as broken up or dissolved forms, which suggests that the building has age and addition over time when it is a new build. If the form is still designed sensitively in regards to its size, then a singular form does not necessarily create more visual impact and is more honest.	The Guidance is not a set of rules but rather a set of principles which can be addressed in different ways. The example shown in A.8 is provided to illustrate how sub-dividing a building into a number of visually distinct elements can reduce its overall visual impact. Whilst simple, additive forms are characteristic of Gower, it is agreed however, that if the	Add the following to para 1.3 in Section 1, and repeat in para A1.2 in Module 5A for clarity (consistent with Placemaking SPGs): <u>"The Guidance outlines the placemaking issues which need to be considered on a 'case by case' basis. The guidance is not a set of rules but rather a set of principles which can be addressed in many different ways. The</u>

		form of a new building is designed sensitively then a singular form does not necessarily result in greater visual impact.	<u>overarching purpose is to facilitate the Placemaking aspirations of the Council and deliver the key objective of significantly raising standards of design across the Gower AoNB”.</u>
	<p>A20 - This section suggests that an extension to an existing building should always be significantly smaller than the existing, however this does not acknowledge the requirements of modern living and growing families. A sensitive yet larger extension is often preferable to a new build on the same plot, in the context of historic buildings.</p> <p>In regards to the above, a case by case review would be preferable to a blanket statement across the Gower.</p>	The guidance provided in A.20 aligns with that provided in the HDDG, that being an extension should be subordinate to the original dwelling. The requirements of modern living and growing families are acknowledged and proposals will be considered on a case-by-case basis, The general guidance for extensions to be subordinate is considered appropriate.	Amend text as above.
	We noticed a couple of spelling errors, so this may need to be reviewed prior to finalising the document.	Noted. The document will be subject to final editing.	Proof read and edit document

<p>Member of the public</p>	<p>Guidance for housing – Fig A2 is unfair in using different colours to make it jar.</p> <p>Fig A1 – remove the porch to make it bland, and the extension looks like a disjointed afterthought. Thankfully, CCS gave me planning consent to do an A2 extension which makes the house look whole and properly planned, and a big improvement on the original extension, as well as providing a large functional family home</p>	<p>It is not clear which section comment refers to.</p> <p>Comments may relate to sections A20 and A22</p> <p>Diagrams are for illustration purposes. The guidance provided in A.20 aligns with that provided in the HHDG, that being an extension should be subordinate to the original dwelling. The requirements of modern living and growing families are acknowledged and proposals will be considered on a case-by-case basis, The general guidance for extensions to be subordinate is considered appropriate.</p>	
<p>Pobl</p>	<p>The tight knit villages of Gower such as Port Eynon, Bishopston, Reynoldston and Llanrhidian can provide inspiration for new places to live. These villages exhibit historic character, streets created organically primarily for people, informal greenspaces, and a wealth of details, all of which can inspire the design of new places to live.</p>	<p>Noted. The response helpfully points out that many existing areas of Swansea possess positive placemaking qualities and have been successful places to live for over 100 years. This is touched upon in para A1.12 but there is an opportunity to increase the emphasis on learning from existing places.</p>	<p>Add text to para A1.12 to explain design for new developments can learn from existing established settlements.</p>

NRW	Yes, the module provides suitable guidance on the placemaking principles that should apply for the range of residential development proposals that could come forward within the Gower AONB	Comment welcome	No change
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Module 5 C: Commercial and Tourism includes specific guidance in relation to appropriate commercial advertisement and signage in Gower. The module will replace the SPG 'Advertising Policy in Gower' which was adopted in support of previous development plans.

QUESTION 3: Does module provide clear advice for applicants in relation to commercial advertising and signage? If No, please explain how it can be improved			
Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	Yes, the module provides clear advice.	Comment noted.	No change
The Gower Society	C1.36: Even though require consent, some advertising flags are used inappropriately.	Comment noted. Enforcement action will be taken when necessary.	No change

Module 5 E: Chalet Developments - The guidance in this module incorporates relevant parts of existing SPGs relating to various different residential chalet developments on Gower, including those in Hareslade, Holt's Field, Miles Lane and Sandy Lane. Those SPGs were adopted as SPG in support of previous development plans. The guidance Module 5E is aimed at all residential chalets, not just those located in the named chalet communities. It does not apply to 'holiday' chalets located in established holiday parks. In response to comments received during the initial 2020 public consultation on the document, the Module has been amended to clarify the placemaking principles relating to development/extensions of roof spaces and extensions of existing chalets.

QUESTION 4: Does the module provide clear and appropriate advice to owners/developers of residential chalets?

If **NO**, please suggest what amendments could be made to make it clearer:

Organisation	Comments	Council's Response	Changes proposed to SPG document
The Gower Society	E1.27: Rolled pure zinc weathers rapidly and does not require colour Same comments as upvc above. There are rainwater goods that are difficult to see the difference between those and cast iron or aluminium. We have experience of aluminium that oxidises in the sea air.	Noted.	No change.
Member of the Public	With reference to Owens Field and Holts Field, I would like to see a greater emphasis on the importance of incorporating repurposed and recycled building materials and components in chalet building, renovation or replacement. These chalet communities are described in the Revised Gower AONB Design Guide 2020 (Section E1.2 to E1.4) as being areas of special character and retaining some of their original low key and semi-rural characteristics and as such	Noted. The document does not prohibit recycling/re-use of materials, and this can be highlighted.	Insert reference to the potential use of re-cycled materials where appropriate.

	<p>being rare examples of Swansea's history and unique built heritage.</p> <p>In the past, there was always evidence of reuse and reclamation of structures and materials, which led to the unique and idiosyncratic nature of the chalet communities. Preference should be given to a continuation of this tradition for several reasons. Where used sympathetically this eclectic mixture of materials can add individual character to each chalet in keeping with the suggested aims (in the Design Guide E1.24) of seeking to achieve a diversity in character and appearance to other existing chalets, and also other stated aims of retaining low key characteristics and preventing urban style encroachment. The use of found and recycled materials was usually for economic reasons but today it is even more appropriate because of the need for sustainability and minimising environmental impact in sourcing building materials.</p> <p>Referring to previous consultation comments submitted. I agree with the Gower society preference for standard galvanised corrugated sheeting as roofing and to a lesser extent cladding. I also agree with person who commented that blockwork was particularly unsuitable in these chalet communities. I am glad the reference to solid construction has now been removed, indeed I'm surprised it was ever included. All construction should be light weight.</p>		
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NRW	Yes, the module provides clear and appropriate advice to owners/developers of residential chalets.	Noted.	No change.
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Module 5H: Green Infrastructure, Landscape and Biodiversity provides advice on Green Infrastructure as an integral part of Placemaking and explain the Council's duty to maintain and enhance biodiversity and promote the resilience of ecosystems (Section 6 Duty, Environment Wales Act 2016).

QUESTION 5: Does the model provide clear advice for applicants/developers in relation to Green Infrastructure and biodiversity?

If **NO**, please suggest how the advice could be improved:

Organisation	Comments	Council's Response	Changes proposed to SPG documents
The Gower Society	H7 The trees and hedges on Gower have insufficient protection. Enforcement is an issue or lack of it. We do not think the wording is strong enough.	Comment noted, but as stated previously in relation to first consultation on the new SPG, many hedgerows are protected under the Hedgerow Regulations and trees under other legislation. Enforcement can only take place if notified of unauthorised works.	No change.
NRW	Yes, the module provides clear advice for applicants/developers in relation to Green Infrastructure and biodiversity. However, landscape and landscape design are preferred terms, as all encompassing, rather than landscaping.	Noted. The title of Module 5H on the title page of Section 5 is an error that does not reflect the title of Module 5H. Amend to 'green infrastructure, landscape and biodiversity'.	Amend title of Module H on title page of Section 5, to 'green infrastructure, landscape and biodiversity'

<p>Member of the public</p>	<p>Sustainable Urban Drainage Systems = SUDS. The acronym is used in one document (Urban meaning “built environment” not “metropolitan”). Elsewhere “Urban” is dropped and SUstainable relied on to maintain an acronym that no longer works. Swales need level ground to construct, and can be dangerous (high heels, in the dark after a party) and require maintenance which tends to be forgotten. Attenuation ponds would look wonderful with ducks and swans swimming on them, but if they are not drying out to a muddy bowl, they are not functioning as intended. Because of a fear of drowning, they are sometimes surrounded by thorns, so the maintaining operatives cannot get in, but the kids they are designed to keep out will find a way in. Hydrobrakes do not seem to get a mention, as the best flash flood preventers, but they require sloping ground to be planned in. Rainwater harvesting is generally the most effective SUDS measure, in terms of absorbing the first part of a storm, and then recycling rainwater, taking about 40% of the load off the water main for domestic properties, and potentially more for commercial ones. Why build huge reservoirs and pay to filter, chlorinate and pump water all the way from the Brecon Beacons just to flush a loo or water a garden? More use should be made, but it does not fit neatly into your 3 categories. <i>Comment also relevant to module H and section 3.</i></p>	<p>National legislation and policy, including Schedule 3 of the Flood and Water Management Act 2010, refer to ‘sustainable drainage systems (SuDS). The acronym will be changed throughout the document where necessary. Rainwater harvesting is part of house design, rather than the mechanics of surface water flow and something designed to meet the technical requirements of the SAB application. Details of landscape design around SuDS features must be site specific.</p>	<p>Amend ‘SUDS’ to ‘SuDS’ where necessary in document. No other changes.</p>
<p>Internal comments</p>	<p>H1.29 refers to "ancient hedgerows" protected under the Hedgerow Regs, but the wording in the Regs is actually "important hedgerows."</p>	<p>Noted. Amend H1.29 in order to be consistent with the Hedgerow Regs.</p>	<p>In H1.29 change ‘ancient hedgerows’ to ‘important hedgerows’</p>

Internal comment	H1.43 "If protected species are found and disturbing them is unavoidable you will need to obtain a licence in addition to planning permission." A licence is actually only needed for European protected species or others such as badgers and water voles. This should read something like "If protected species are found and disturbing them is unavoidable you may need to obtain a licence in addition to planning permission, and provide suitable mitigation or compensation.	Noted. Amend H1.43 to accurately reflect the need for a licence.	Amend second sentence of H1.43 as follows: "If protected species are found and disturbing them is unavoidable you may need to obtain a licence in addition to planning permission, and provide suitable mitigation or compensation."
Internal comment	H1.43 "It is also important to consider your programme of works to account for the bird nesting season, from March to August inclusive. Tree works and clearance must not be undertaken during this period." Tree works can be undertaken between March and August, but will need to happen after a suitably qualified ecologist has confirmed absence of active bird nests. The bird nesting season should really be "from late February to early September.	Comment noted. Text will be amended for clarity.	Amend third and fourth sentences in H1.43 as follows: "It is also important to consider your programme of works to account for the bird nesting season, from late February to early September (inclusive). Tree works and clearance undertaken between March and August (inclusive) can only occur after a suitably qualified ecologist has confirmed absence of active bird nests."
Internal comment	H1.45 "Bee and insect features" is a bit vague. Suggest "Insect hotels."	Agree. Amend text as suggested	H1.45. amend fourth bullet point 'Bee and insect features' to read 'Insect hotels'.
Internal comment	H1.50 'Delete the following sentence: 'Unless maintained.....monetary value.' A non-maintained landscape is often species rich and can	Agree.	Delete reference to monetary value and add

	have high ecological value. Why reference monetary values when discussing landscape quality?		'potentially' prior to 'reduced ecological value'.
Internal comment	Delete paragraph H1.51. What does it mean? It is a bit strange – asking school children to undertake works as part of a development consent?	Agree. Delete paragraph	Delete paragraph H1.51
Internal comment	Page H19 refers to "Biodiversity SPG (Forthcoming)." This has now been adopted and the web link should be provided. Also this link does not work http://www.swansea.gov.uk/index.cfm?articleid=10979	Agree.	Update reference to biodiversity SPG and weblink on page H19.

Module 5 I: Lighting - The module will replace the 'Lighting Scheme Guidance for Gower AONB (2010)' document which was adopted as SPG to the superseded UDP. The module seeks to prevent light pollution and maintain the dark sky environment of Gower by ensuring good lighting design. The module sets out guidance for external lighting design, the lighting issues that should be considered by architects and designers, and what to include within a 'Lighting Plan'.

QUESTION 6(a). Does the module clearly link with LDP Policy RP 3 and provide clear advice and guidance for developers and applicants within regard to both internal and external lighting within, and adjacent to, the AONB?

If NO, please suggest the advice could be improved, particularly the methods to control internal light spill.

Organisation	Comments	Council's Response	Changes proposed to SPG document
The Gower Society	We cannot overstate the importance of this section. It is complicated and technical and we are worried that people will not fully understand it. Dark skies emphasis, bright lights a no-no, timers essential, type of light source essential. Simplification needed.	It is acknowledged that parts of the document focus on technical issues and numerical parameters. The use of internal and external lighting is one of these technical areas, which to a large extent is unavoidable. All opportunities will be taken to simplify language and the technical requirements within the document, where this is possible.	Take all opportunities to simplify text and legibility of Module.
	110: Is new text re: light spill from developments with large window void strong enough?	Comment noted. The document is considered appropriate to provide guidance for developers in this regard.	No change.
NRW	See response to Q10.	noted	See response below.

QUESTION 6b: Does module (5I) clearly set out what developers/applicants are expected to include within a Lighting Plan?

If No, please suggest how the advice could be improved:

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	Yes, the module sets out what developers/applicants are expected to include within a Lighting Plan	Comments welcome	No change
Internal comment	Advice regarding lighting should also refer to protection of biodiversity. A sensitive lighting strategy, designed to ensure that the habitats adjacent to the site and any retained/proposed habitat areas are not lit during the construction, or operation phases of the development must be submitted to the LPA for approval. The strategy must outline avoidance of impacts of lighting on bats and other nocturnal species and should include measures to ensure that protected species using the site for commuting and foraging purposes can continue to do so, without disturbance.	Additional text inserted into paragraph I1.56	Add additional text into paragraph I1.56
Internal comment	Any lighting strategy or plan shall reflect the Bat Conservation Trust's Bats and Lighting in the U.K. (2018) guidance (with low level light levels only between 2700-3000 kelvin accepted). This lighting strategy/plan shall be agreed with the LPA Planning Ecologist prior to any planning permission being considered.	Add additional text under 'bats' on page I16	Add additional text in box on p.I16 under 'bats' heading.

Appendix 6 contains Settlement Character Areas and Settlement Statements, with updated plans and text from the 2008 AONB Design Guide. New settlement statements for Kittle, and Pennard and Southgate are included.

QUESTION 7: Are the settlement statements easy to understand and do they provide clear guidance as to the character of each settlement?

If No, please suggest how the advice could be improved

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	Yes, the settlement statements are easy to understand and provide clear guidance as to the character of each settlement. The inclusion of Kittle, Pennard and Southgate should be beneficial in the interests of enhancing design and character and raising the standards. The second Llanmadoc page is incorrectly titled.	Comments welcome. Noted. The document will be subject to a final edit.	Amend the title on the second Llanmadoc page.

Appendix 7 contains extracts from the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment 2016 that developers and applicants should take into account when proposing development which will have a seascape impact.

QUESTION 8: Are extracts from relevant Seascape Character Areas included within the Design Guide?

If No, please state which SCAs should be included/excluded:

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	Yes, the relevant SCA extracts of are included within the Design Guide.	Comment welcome	No change.

SECTION 3: FURTHER COMMENTS

QUESTION 9: If you commented on the previous consultation document, do you consider your comments to have been adequately addressed within the revised document?

If No, please state what further amendments would address your concerns?:

Organisation	Comments	Council's Response	Changes proposed to SPG document
The Gower Society	Yes, document much improved, but still have some queries.	Comments welcome and detailed throughout this report.	Amendments made to document where considered relevant and necessary.
NRW	Yes, comments to have been adequately addressed within the revised document.	Comment welcome	No change
GGAT	Thank you for consulting us regarding these draft SPG documents, and thank you for the further information supplied. We had recommended the inclusion and information related to the legislation, policy, supporting documentation and best practice guidance for the historic environment, and these inclusion have now been made.	Comments welcome	No change

QUESTION 10: In addition to any comments made in relation to Questions 1-9 above, do you have any further comments on how the SPG could be improved and/or amended? Please specify below:

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	<p>I do not read anywhere that in Gower we should be trying to create friendly communities, primarily aimed at family life. When my family moved to Oxwich 33 years ago, it was mainly working families, with a few holiday homes. The second/holiday homes have proliferated and sucked the life out of the village. Those of us that remain are mainly retired, so it has become a holiday/retirement village. I am hopeful that Fibre-to-the-premises Broadband will attract families here to work from home, and support Knelston School before it closes. What can planners do to help put life back into the wonderful Gower villages by making residents live here full-time? As I understand it, a lot of second/holiday homes get registered as businesses to avoid Council Tax, and then apply for small business relief, so they end up paying nothing to CCS (the Council Tax of the rest of us goes up to compensate). The Gower villages all have good community spirit, with unofficial Neighbourhood Watch in place, as we all know our neighbours well. A few people want little contact with their neighbours, but most love the fact that we are not just neighbours, we are</p>	<p>Comments noted. Many of the points raised raise important issues to be addressed in the interests of the long term sustainability of Gower and those that reside within and visit the area. A number of these points however lie outside what the planning system is able to control or influence. Currently, the planning system cannot control the purchase and use of existing dwellings as second homes or holiday lets. However, new development is conditioned to ensure that it cannot be used as a holiday let or as a second home, in order to address the issues raised.</p>	<p>No change proposed.</p>

	<p>friends. Planning should be seeking to foster that everywhere, starting by allowing adaption of houses to make them family-friendly.</p> <p>I see that energy efficiency is promoted, and that Gower vernacular can accommodate larger windows, but there seems to be a preference for tiny old-fashioned windows. This may make for attractive looking buildings, but there will be little solar heat gain and a need for electric lighting just to be able to read. Surely, Gower is rightly designated for its NATURAL beauty, not the built environment, so Planning could be a bit more flexible, as long as what is built is practical and not completely at odds with its surroundings?</p>	<p>Window design will be considered as appropriate to the context of the proposal. The built environment must not detract from the natural beauty of the AONB.</p>	
Gower Society	<p>Module 5B: Agriculture Agricultural section headed by an image of a barn that is purely storage for a campsite. In addition, it has a large orange security light on for all hours at night and base colour is white. There are better examples. This is poor for the reasons stated. Try the one at Llandewi or a recent one at Sluxton</p>	<p>The image does not say if it is a good or bad example of an agricultural building.</p>	No change
	<p>Do you think strong enough? Greater emphasis could still be made on sheeting colour, concrete wall colour and tree planting. The so called natural colour is in fact closer to white than grey and simply does not weather. There are some rather grim examples in the AONB</p>	<p>Comment noted. B1.15 sets out the general principles to be followed when considering colours and materials. B1.23 provides general principles for landscape design.</p>	No change.
	<p>B6: The new ag buildings are increasing and they are like a creeping plague in the AONB.</p>	<p>Comment noted. B1.15 sets out the general principles to</p>	No change

	The lower areas of walls are a stand out when light coloured block or concrete. Very few tree plantings. Just think how Paviland Manor sheds could be improved	be followed when considering colours and materials. B1.23 provides general principles for landscape design.	
	B7 We accept that it is a difficult area. Light sheets are often better against the skyline but green nearly always better dark against land. Northhills is not a good example for reasons already stated.	Comment noted. B1.15 sets out the general principles to be followed when considering colours and materials.	No change
	Module 5G: A Sustainable Design Approach: G1.35: Is new text re: black frames and internals essential for solar panels strong enough? We cannot over emphasise how much better the all black type look within the landscape	Comment noted. The wording is considered appropriate.	No change
	Module 5F Repair and Maintenance: F9 F1.37. Do not use polished stainless steel as it looks brash and clinical in the countryside.	Agree. Add text: Due to the potentially corrosive nature of the maritime climate, marine quality stainless steel is often the most appropriate choice, however cast iron can also be used. Marine steel is often more appropriate for 'modern' designed developments whilst hot dipped galvanised steel or molten zinc spray is often more appropriate for 'traditional' designs. Polished stainless steel may not be appropriate.	Text added.

	F9 F1.38 Nice to quote Kennoxstone Farmhouse but our research has shown the use of ox blood was not widespread.	Comment noted.	No change.
	F1.49: Sparrows, swifts, swallow, bats and owls take readily to homes for them	Comment noted	No change proposed
NRW	<p>Natural Resources Wales (NRW) have recently completed work on Dark Skies: Natural Resources Wales / New map casts light on Wales' dark skies. We advise reference is made to this information in Module 5I Lighting.</p> <p>Also to be noted is the emerging TAN11 Soundscapes, which is due out for consultation in the Autumn and includes information on tranquillity, along with forthcoming work on Tranquillity mapping being carried out by NRW, due early 2022. Depending on the timescales for this Placemaking Guidance, it may be possible to refer to these two pieces of work.</p> <p>Appendix 1 AP8 Policy ER4 has an error in the wording of iv).</p> <p>Appendix 8 Plant Species - Recommended Woodland Groups does not refer to Ash woodlands and how the issue of Ash dieback would be dealt with and refers to Small-leaved Lime as suitable for large gardens, although it is a suitable woodland tree as noted in the Table. It is unclear whether the mix for calcareous soils which includes Small leaved Lime is intended for</p>	<p>Agree.</p> <p>As the draft TAN and Tranquillity map have yet to be issued for consultation, it is too early in the process to refer to a documents as it could introduce erroneous references in the SPG. PPW and LDP policies RP1, RP2 and RP3 address noise and light pollution.</p> <p>Noted. Error will be corrected.</p> <p>Noted. Error on p.AP8, ER4 iv will be corrected as follows: 'Be designed to an appropriately high standard in order to integrate of the natural</p>	<p>Insert reference to NRW's Dark Skies and Light Pollution map in paragraph I1.34 and within Table 2.</p> <p>No change.</p> <p>Amend Typing error on p.AP8, ER4iv as stated.</p>

	<p>areas where, previously Ash woodland would have been suitable.</p>	<p>beauty of the AONB with the existing landscape and where feasible enhance the landscape quality; and'</p>	
GGAT	<p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our advisory teams. Swansea has adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.</p> <p>We have previously commented on the Placemaking Guidance for the Gower AONB (formerly design guide), and the Trees, Hedgerows and Woodlands SPGs consultation in our letters of 20 July 2021 and 15 September 2020.</p> <p>Whilst none of the documents directly concerns the historic environment, they acknowledge the Welsh government legislation, policy and supporting suite of guidance and best practice documents relating to the historic environment and managing change in the historic environment. The value of the historic environment, as built and buried, and landscape designations needs to be included as there are instances where the natural environment and</p>	<p>Comments noted.</p> <p>Archaeologically Sensitive Areas are referred to in LDP policy HC2 and are shown on the LDP Constraints and Issues Map.</p>	No change

	<p>the historic environment coexist and management of these can be linked.</p> <p>Residential development, infill and backland developments, and householder development including changes to buildings can have an impact on both buried and upstanding remains, and it is best to recognise that this should be acknowledged and mitigated at the earliest stage. The importance of the historic environment and archaeological resource varies in nature and small developments, including extensions, or work to listed or historic buildings, can have as significant an impact as large developments.</p> <p>The management of the natural environment in some development situations can also be undertaken together with the historic environment. There have been instances in other UAs where the methodology for development mitigation has been jointly produced by the archaeological contractor and the environmental contractor, in order to manage the impact of the changes appropriately.</p> <p>Since the Historic Environment (Wales) Act 2016, and the subsequent Welsh Government Policy, Chapter 6 of Planning Policy Wales Edition 11 2021: Distinctive and Natural Places, TAN24: The Historic Environment; and supporting Best Practice Guidance, strategic</p>		
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	<p>level provision of advice and responsibility regarding the historic environment is available. The suite of Best Practice Guidance includes managing change to: the setting of historic assets; listed buildings; conservation areas; buildings at risk; historic assets of special</p> <p>local importance; registered historic parks and gardens; and historic character.</p> <p>We note that your authority has no SPG for the historic environment; best practice is to have an SPG for the historic environment, to include the Archaeologically Sensitive Areas; SPGs have been produced for other local authorities in SE Wales. This ensures that the historic environment is to the forefront at a strategic level and that subsequent mitigation at detailed level has an accepted base.</p> <p>Proposed changes which will impact the historic environment can be mitigated in a timely manner by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may lead to risk are unmitigated change from both physical and visual means.</p> <p>All historic environment and archaeological work, including that undertaken to assess change in sensitive areas and which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered</p>		
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	<p>Institute for Archaeologists https://www.archaeologists.net/codes/cifa</p> <p>It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where the historic environment is a consideration with other sectors.</p>		
Internal comment	Page 11 should list the number of SINC (Sites of Importance for Nature Conservation) on Gower.	Agree	List the number of SINC within the Gower AONB on page 11, Section 2.
Internal comment	Section 3, page 37 should list SINC under "Designations & Easements."	Agree.	Amend grey box on page 37, Section 3, to include 'SINC' under the heading 'Designations & Easements'
Internal comment	Appendix 8 AP.153: move Ulex gallia to a row underneath Ulex Europa on AP.152. Strange to split them.	Agree.	Move as suggested.
	Appendix: 8 AP.153. Atriplex portulacoides, Ononis spinose and Hypericum androsaemum are plants, not shrubs.	Noted. Heading in table changed.	Change heading in table to tree, shrub and plant species and change side heading to 'plants' at this point.
Pobl	Sustainable Design principles as part of the art of Placemaking. There are fundamental ideas such as 'Fabric First', form factor, solar orientation, overheating, water use and other criteria that need to figure prominently in this SPG. Each home built to today's Building Regulation standards, is another home which will need to be retrofitted by its owners within less than a generation.	Sustainable or low carbon requirements for buildings can only be set nationally via Building Regulations or national planning policy. In future this may be addressed in the LDP for all scales of development however at present the LDP	No change

	<p>The SPG requires a section on Sustainable Design. The Integration of Renewable Technologies Renewable energy generation at a micro level and other technologies for residential living such as electric vehicle charging need to be included within this SPG. As Wales moves way from fossil fuels for the heating and power of our homes, so we need to accept that technology will figure more prominently in the townscapes of the future.</p> <p>The Council as planning authority needs to consider that balance between the way new developments look (aesthetics) and the way they function – which includes decarbonisation as well as health, wellbeing, sense of community, and environmental impact. Renewable technologies will evolve and the SPG should take a pragmatic and flexible view, accepting that initially this may result in aesthetically unappealing buildings as society adjusts to the changes it must make rapidly</p>	<p>requires energy strategies for strategic sites. It is not appropriate to set these standards via this SPG.</p> <p>Module 5A, paragraph A1.9 addresses electric vehicle charging.</p> <p>Module 5G supports the positive integration of sustainable technologies.</p>	
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