# REPORT ON INITIAL CONSULTATION UNDERTAKEN ON DRAFT GOWER AONB DESIGN GUIDE, 2020

Summary of Findings from First Public Consultation Exercise

City & County of Swansea Council May 2021

## REPORT ON INITIAL CONSULTATION UNDERTAKEN ON DRAFT GOWER AONB DESIGN GUIDE, 2020

### Summary of Findings from First Public Consultation Exercise

#### 1. \_\_Introduction

- 1.1 On July 2020, the City & County of Swansea Council Planning Committee approved a draft version of the revised 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 **4**<sup>th</sup> **September and 16**<sup>th</sup> **October 2020**<sup>1</sup>.
- 1.3 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
  - 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
  - Remote briefings to stakeholder groups via Microsoft Teams presentations.
  - Publication of recorded video presentations on the Council's website.

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.

 $<sup>^{1}</sup>$  The closing date was extended to 26th October 2020 for two specific stakeholders due to an administrative error

As a Ward Councillor (1)  • Cllr Lynda James	As an agent (e.g. planning consultant, architect) (-)
As a member of the public (5)	<ul> <li>On behalf of an organisation (6)</li> <li>The Gower Society</li> <li>The Wildlife Trust of South and West Wales</li> <li>Pennard Community Council</li> <li>Glamorgan Gwent Archaeological Trust</li> <li>Natural Resources Wales</li> <li>Bat Conservation Trust</li> </ul>
As the owner of a business (-)	

- 1.4 All of the comments received have been recorded and evaluated<sup>2</sup>. 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 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 Guide has been subject to further amendments. Due to the nature and extent of the amendments, the document will be presented for a further period of public consultation prior to a final version being produced for formal adoption as SPG. A separate report will be produced to set out the findings of this future consultation process.
- 1.7. It should be noted that the revised version of the Guide to be subject to future consultation will be re-named to 'Placemaking Guidance for the Gower AONB', to reflect consistency with other SPG and in recognition of the placemaking agenda that forms the central them of national planning guidance and the development plan.

<sup>&</sup>lt;sup>2</sup> One respondent provided two separate responses covering the same theme, and both of these have been recorded in this document.

#### 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 refer to are in reference to the original consultation draft version of the document.

#### **SECTION 1: GENERAL QUESTIONS**

Question 1: Are you aware of the existing Gower AONB Design Guide

Only one respondent was not aware of the existing SPG.

**Question 1a:** If yes, please explain how you are familiar with it and/or how you have used the Guide (for example submitting a planning application, as a planning consultant/agent acting for others, or as an interested resident)

- Through AONB partnership
- I have used it for 3 planning applications, 1 residential for myself and 2 for agricultural for my community project
- Through Gower Society partnership
- Community Council Planning Committee
- Archaeological Trust
- As NRW we use the existing Gower AONB Design Guide to review proposals and inform consultee responses on landscape impacts on the AONB. The updated Gower AONB Design Guide is welcomed, particularly the updated sections on Landscape and Green infrastructure, Lighting and Seascape Character.
- The Gower Society
- As an interested resident

**Question 2:** Do you think the links to the LDP and its policies are made sufficiently clear throughout the draft SPG?

Just over half of the respondents agreed that the links to the LDP and its policies were clear throughout the draft SPG.

#### Question 2a: If no, please explain why

- I don't even understand this it is far too complicated and full of acronyms that i do not understand!!
- Difficult for lay people to understand
- With the need for clarity, within controls, the usage for an AONB, the guide could perhaps have photos showing how the
  policies apply.
- The links are at the beginning and in appendix one, not throughout the document

#### **SECTION 2: QUESTIONS ON SPECIFIC SECTIONS, MODULES AND APPENDICES**

#### Question 2b: Do you have any comments to make on the contents of the following:

- Section 1: Introduction
- Section 2: AONB Character
- Section 3: Development Management Process
- Section 4: Placemaking Objectives
- Section 5A: Residential
- Module 5B: Agriculture
- Module 5D: Conversions
- Module 5G: Sustainable Design Approach
- Appendix 1: Planning Policy Context
- Appendix 2: Key Planning and Design Considerations
- Appendix 5: Landscape Characterisation

Organisation	Comments	Council's Response	Changes proposed to SPG document
	GENERAL CO	MMENTS	
Member of the public	what?????? this is so difficult to understand	Noted	The general legibility and layout of the document improved.
Member of the public	Guidelines appear clear - but the consistency with which they are applied needs to be examined	Noted.	Document checked for consistency.
Pennard Community Council	Too large to navigate effectively to provide guidance	Investigate possibility of putting hyperlinks throughout document.	This will be done for the final version of the document, once adopted.
	SECTION 1: INTE	RODUCTION	
Gower Society	Page 4. Photo bottom RH2.	Unsure what this comment refers to?	None
	Page 5. Brook Cottage still not progressed, and chimneys remove.	Noted.	Attempt to source different image or delete photo

Organisation	Comments	Council's Response	Changes proposed to SPG document
	SECTION 2 AONB	CHARACTER	
Gower Society	Page 7. Does this depict character?	The seascape / coastline of Gower plays a large part in its unique character. This is highlighted in para 2.7.	No change.
	Page 9 2.6-7 Although the list of significant views could become endless might the views East from Tears Point and both East and West from the high ground at Pwlldu headland be added?	Noted. Attempting to add the suggested view points onto the image (LR)	Suggested key view annotations have been added to map.
	Page 15 Do not think that photo's reflect the text. Holiday accommodation try new conversion adjacent to King Arthur or Mewslade Cottage shop conversion.	Photo's illustrate various factors of change and pressures on the landscape. Add an image of the site at Pennard to reflect text on allocated housing sites within the AONB.	New image inserted.

Organisation	Comments	Council's Response	Changes proposed to SPG document
Glamorgan Gwent Archaeological Trust	Thank you for the opportunity to comment on the draft documents. As advisors to your Authority to provide advice regarding archaeology and the historic environment, comments from this Heritage Management section of this Trust are restricted to heritage management advice outside the planning process. Our Archaeological Planning Services will respond separately regarding development and planning matters. This response if regarding the Gower AONB Design Guide review only. General comments Overall, the historic environment (HE) has been fully considered and suitably mentioned in this document and the relevant advice provided. However, a few updates are suggested below.  Section 2.9 - The statutory Historic Environment Record (HER) identifies that within the AONB area there are:- • 80 Scheduled Ancient Monuments • 129 Listed Buildings - 20% of which are Grade I or Grade II* • 5 Historic Parks and Gardens, namely Fairy Hill, Stouthall, Kilvrough, Penrice Castle and Clyne Castle (is The Dingle, Caswell Bay inside the AONB boundary?) • 17 Conservation Areas, and • over 2000 other known sites, features and finds of archaeological interest.	Other text amended as suggested.	Amendments made as suggested.  Suggested text added in paragraphs 2.9 to 2.11.  New 'useful references' section added at the end of the Section providing links to webpages as suggested.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	Section 2.10 - There are two areas of the Gower Peninsular noted in the draft as being Landscapes of Historic Interest; these are included in the Register of Landscapes of Outstanding Historic Interest in Wales. It should be noted, that as well as the two identified areas, the whole of the AONB (with Cadw and UA funding) has been divided into separate areas and the historic environment characterised. This information is more detailed than the historic aspect in LANDMAP and is available to all for the purpose of education and to inform decision-making regarding the effect of change on the historic environment.  Links could be added in the guide for detailed historic environment character area information - Historic Landscape Characterisation website http://www.ggat.org.uk/cadw/historic_landscape/main/english/historical.htm or http://www.ggat.org.uk/cadw/historic_landscape/gower/english/Gower_Features.htm Or for general Historic Landscape guidance https://cadw.gov.wales/advice-support/historic-assets/conservation-areas-and-other-historic-assets/other-historic-assets	Paragraph 2.10  Add text re: Historic parks and garden's will be made statutory under the Historic Environment (Wales) Act, 2016, and text added recommending early contact with archaeological advisors in the development process.	

Organisation	Comments	Council's Response	Changes proposed to SPG document
	Also, resulting from the Historic Environment (Wales) Act 2016, the parks and gardens listed in the Registered Parks and Gardens in Wales will soon be made statutory, further information is available at https://cadw.gov.wales/advice-support/placemaking/legislation-and-guidance/registered-historic-parks-and-gardens We advise contact and discussion with your archaeological advisors at an early stage in any proposed development, or change in land use, as this can help minimise though mitigation any detrimental effect on historic assets or landscapes. Useful contact: Glamorgan Gwent Archaeological Trust Enquiries@ggat.org.uk If you require further information or advice, please do not hesitate to contact me.		

Organisation	Comments	Council's Response	Changes proposed to SPG document
	SECTION 3 DEVELOPMENT N	MANAGEMENT PROCESS	
Gower Society	Page 34 3.7 It is pleasing to see the inclusion of the third bullet point, although it is in fact questionable whether any consent is required, to say, plough and plant a Christmas tree plantation in a listed garden or parkland. This is a lacuna in the conservation legislation.	Bullet Point 3 - No other permissions are required. Special landscape designations are a material consideration. Could remove bullet point and put as text within section 5 relating to historic landscapes.	Bullet point 3 deleted. Historic landscape now listed as a constraint in Stage 5.
NRW	3.7 We suggest clarification in relation to what approvals, other than planning permission will required for Bullet Point 3: 'covered by any special landscape designation (such as historic landscape)?	(As above). Bullet Point 3: no other permissions are required. Special landscape designations are a material consideration. Could remove bullet point and put as text within section 5 relating to historic landscapes.	Bullet point 3 deleted. Historic landscape are listed as a constraint in Stage 5.
	3.7 We suggest including references to Scheduled Monuments and Hedgerow Regulations. We suggest either including paragraphs which refer to additional consents, or as designations that may be needed to be taken into account.	Agree. Add text in relation to SAMs and their setting. Also include hedgerows under final bullet point.	Bullet points added to relate to SAMs and their settings and hedgerows.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	3.11 We also suggest adding the Landscape Institute to this list of advisors as key in an AONB - both with regard to landscape impacts & Landscape & Visual Impact Assessments or Landscape Appraisals, and also with regard to landscape schemes regarding design.	Agree.	Text added to 3.12. Text also added to Section 2.
	3.16 We suggest adding a title to the Grey Box. In addition, we would highlight that in relation to any site analysis/appraisal checklist - key views are not just part of built heritage, but the wider landscape aswell.	Agree	Amendments made as requested  Amend page layout. Title box: Checklist for Context and Analysis Appraisal. Add text to make clear the list within box is not definitive.
	3.19 We recommend that TAN12: Design, should also be mentioned here as key strategic guidance.	Agree	Reference to TAN 12 added.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	SECTION 4 PLACEMA	KING OBJECTIVES	
NRW	4.4 In relation to the Swansea LDP Policy PS2 (p.43) Landscape 1 - we would ask that further clarification is provided to the Green Infrastructure approach - is it set out in PS2, and does this provide more details than TAN12? We suggest that further clarity and a more detailed explanation of the Placemaking Objectives of LDP Policy is provided, rather than TAN12.	Placemaking objectives of LDP are clearly highlighted in the Section, there is no need to duplicate the LDP.  Additional text to be included referencing the 'Placemaking Charter'.  Agree amendments to text throughout section would clarify GI.  Reference to TAN 12 is required in specific relation to the Design of development not just overarching placemaking principles.  Placemaking approach is set out within Module H.	<ul> <li>New text on Placemaking Charter added at para 4.5</li> <li>New paragraphs added to explain GI and provide links to Modules H and G.</li> <li>Amendments to green infrastructure and biodiversity bullet points at paragraph 4.4.</li> <li>Amended text included under Biodiversity and Landscape headings on page 43.</li> <li>Para 4.4, 2<sup>nd</sup> bullet point: expanded to refer to GI at all scales.</li> </ul>

Organisation	Comments	Council's Response	Changes proposed to SPG document
	SECTION 5 GUIDA	NCE MODULES	
The Gower Society	Page 46a Introduction Photo. This is an older house. Does it match the words?	The image shows some of the older houses on Gower. It doesn't conflict with the chapter, which introduces the guidance modules.	No change proposed.
	Page 49 Difficult to read.	Will attempt to amend images.	Attempt to amend images.
	MODULE 5A RE	ESIDENTIAL	
The Gower Society	A1 The modern dwellings could show AONB extensions/houses. The Tillers Llanrhidian, The Nook Extension, Mewslade Cottage conversion, underground house Rhossili?	Modern image to be replaced with one of Bank Croft, Llanrhidian.	Replace modern vernacluar image with one of Bank Croft, Llanrhidian.

Organisation	Comments	Council's Response	Changes proposed to SPG document
The Gower Society	A3 Not certain where the photo of Rhossili Green fits into text. A7 A1.24 delete "plan". It should read "additive forms".	Image shows the church and village green, key elements of the conservation area and character of the village.  Agree to delete 'plan'	Title of image has been amended to: Rhossili, with St. Mary's Church to the right and village green in foreground. Key elements of the conservation area and which add to the character of the key village.  Amendment to A1.24 as suggested.
	A8 Gower example?	The image illustrating poor design is appropriate as is the image illustrating good design in the Gower AONB.	No change proposed
	A13 Bit of an Emperor's Clothes with Stormy Castle as it is very bad in the night landscape. Lighting?	Reference is made to special consideration being given to the issue of 'light spill' in para A1.35	Text added in A1.35 regarding light spill and links to module 5l.
	A14 Nothing local or in Wales?	Agree. Source local images.	Replace Isle of Skye example with The Tillers, Llanrhidian

Organisation	Comments	Council's Response	Changes proposed to SPG document
	A20 We have an aversion to plastic (a NO for any doors) but we do think that in certain cases good quality uPVC or aluminium can be cheaper and last longer.	A20 relates specifically to conservatories/sunrooms.  The text notes that the preference is for timber but, if other materials are to be considered (aluminium/uPVC) then the design should be sensitive to the main building. The text goes on the say that uPVC should be avoided unless the context and/or proposed details suggest otherwise.	Text acceptable. No change.
	A22 We deplore Juliet balconies, but they are allowed but never used. A fashion statement.	Para A1.71 and A1.72 provide general guidance on balconies. Reference to Juliet balconies to be added.	Add reference at end of para A1.71, "Likewise, the appropriateness of the inclusion of a Juliet balcony will be dependent on the character of the individual dwelling".
A24 Top LH photo? What is	A24 Top LH photo? What is it saying?	Images show before and after renovation examples.	No change proposed.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	A25 Two poor examples in photos.	A25 relates specifically to detailing.	Replace image with local example
		The first image shows a traditional Gower cottage.	
		The second image shows a contemporary house (not local).	
	A20 Most large new box structures are in our opinion terrible at night. Better hidden away.	Light spill is addressed within the updated text at para A1.35: "Light spill from large window voids can in some instances result in impacts on tranquillity and biodiversity. Special consideration must be given to the issue of light spill resulting from the design of any building (refer to module 5l for further details)."	Amend as suggested.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	A27 Lime/cement/grit or fine pebble wet dash traditional in Gower from invention of Portland cement. Wood float coarse sand cement lime rendering of blockwork with suitable coating or lumpy 'pretend' lime washed stone can be highly effective.	Bullet point b. notes that the most appropriate finishes are 'Stone or traditional lime render'. This is not however an exhaustive list and other finishes may be acceptable dependent of the character of the dwelling.	Update point b to read:  Stone and traditional line render are the most appropriate finishes (this is not an exhaustive list and other finishes may be acceptable)
	A20 Contemporary examples from England. Nothing more local?	Unsure what this comment refers to?	No change
	A34 We refer to A20 above.	Unsure what comment refers to	No change
	A35 Very good but modern paint systems are not up to long life protection. A difficult area.	A35 relates to window style and detail. Presumably the comment relates to point a. which states that "Generally, original windows should be retained and repaired where possible". The text goes on to say that if not possible, then the design of any new window should be in keeping with the period of the building. This point stands.	No change.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	previously high-quality well-designed windows in alternative materials should never be dismissed.	Agree.	A34 Amend bullet point c to read:
		Amend text on both A34 and A38 relating to windows.	However, if uPVC is the predominant material locally, then this may be acceptable for the new windows provided they are of good quality and incorporate acceptable detailing to replicate a traditional timber window
			p.A34 add bullet point re: Colour of window frames should be considered as part of the overall design and should be appropriate to the context of the scheme
			p. A38 Amend bullet point e: 'upvc doors are not an acceptable replacement within an existing traditional building

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	A1.8 - Implementing development of a typical suburban form should be avoided.	Agree. This is stated in A1.8	No change required. Guidance is clear.
	A1.9- This could be reinforced where the surrounding context is suburban and where the layout and house types are inappropriate to Gower. It should not be replicated in new development. Enhancement is required.	This is stated in A1.8. The paragraphs should be read together.	No change required. Guidance is clear.
	A1.8 - We also recommend that some guidance on car parking and how to integrate it with appropriate layouts & design would be useful, along with a reference to A1.8.	Agree. New para to follow A1.8:  "New residential development or alterations to existing homes should provide adequate and sensitively integrated car parking, the visual impact of which should be minimised through the use of appropriate screening to ensure parked cars do not	Amend as suggested.

Organisation	Comments	Council's Response	Changes proposed to SPG document
		dominate the plot or wider streetscene. Within settlements, parking in front of buildings should be avoided as this is likely to have a negative impact upon the streetscape and lane character. The integration of electric charging points should be considered."	
	Environmental Colour Assessment is a useful tool that could also be referred to - A1.40 references colours complementing landscape, as does B1.15 (in relation to agricultural buildings), along with C1.12 (the colour & materials section) in Commercial and Tourism.	Agree. Reference to ECA to be included in 5A and also introduced earlier in the document in Section 2: AONB Character.	Reference to Environmental Colour Assessment added in module 5A. ECA also introduced in Section 2: AONB Character.
Member of the public	Whilst I am very glad to see reference to the One Planet Development policy, I would like to see a more positive approach to this, the current section seems to be suggesting that the AONB designation could be used to refuse a One Planet Development application, which is not the case.	The AONB is a protected landscape and as such any development may be refused due to landscape impacts, including OPD.	No change proposed.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	MODULE 5B AG	RICULTURAL	
The Gower Society	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. A better example available?	Image illustrates an agricultural barn, current use nothwithstanding.	No change proposed
	B2 Darker colours of sides and tree planting suggested to cut down the impact.	This is already stated within box B1.15	No change proposed.
	B5 Modern fibre cement is almost white and not grey as described in applications. It does not weather like the old asbestos cement. Grey or green must be considered as well as coloured blockwork or timber cladding.	This comment appears to relate to 'B6' which covers 'colour and materials.  Add in text making reference to Environmental Colour Analysis and that coloured profile cladding may be appropriate.	Add the following to point e) B1.15:  Environmental Colour Assessment is a useful method to help inform colour selection and assist incorporating development within the landscape.  Colour profile cladding may be allowed where appropriate.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	B7 Not certain if the top example is supposed to be good or bad. Check. Bottom photo of Three Cliffs camp site again. Note white walls, this is not a good example. Tree screen or darker colours.	Top photo. Amend text: "prominent landmark feature against the skyline from certain views, mitigation against massing in the landscape has been achieved by the use of dark colours  Bottom photo. Amend image	Text and images amended
The Gower Society	B8 More on tree planting please.  What is the example of silage store to do with the text?	Agree. Additional text re: tree planning will be included in B1.23.  The image links with the text in pargraph B1.20.	Text added re: tree planting in B1.23.
NRW	Environmental Colour Assessment is a useful tool that could also be referred to - A1.40 references colours complementing landscape, as does B1.15 (in relation to agricultural buildings), along with C1.12 (the colour & materials section) in Commercial and Tourism.	Agree. Reference to Environmental Colour Assessment will be added.	Text added to B1.15 bullet point e

Organisation	Comments	Council's Response	Changes proposed to SPG document
	MODULE 5D CO	NVERSIONS	
The Gower Society	D1.5 Photographs are essential preconstruction.	The use of the word 'may' is appropriate and a planning condition will be used where necessary. The text will be amended to state 'before, during and after works'.	None
	D4 The example is in Wales but there must be decent local examples.	Agree. New image used.	New image
	D5 uPVC utters and down pipes are available in cast iron look alikes. Should not be banned.	Agree. Colour is more important than material, so add text re: importance of colour	D1.13 Bullet point e. Delete last sentence. Reference to colour added to 'e'.
	D6 Top photo is not acceptable as there are many local examples.	New image inserted	New image inserted
	D8 Not certain about any of these photos.	New image inserted.	New image inserted

Organisation	Comments	Council's Response	Changes proposed to SPG document
	MODULE 5F REPAIR A	ND MAINTENANCE	
The Gower Society	F5 Traditionally a brushed flush faced pointing of stonework has been practised on Gower for 100 years or more.	Agree, reference to brush pointing will be added.	Add text at F1.16 re: brushed flush faced pointing of stonework
	F1.13 Coarse sand cement lime mortar has been successfully used on stonework because to moves and breathes. Should always course the stones horizontal and avoid the vertical crazy paving look!	Noted	No change proposed to text.
	F6 F1.25 Architectural salvage yards and contractors can be a useful source of good materials.	Noted.	Reference to architectural salvage yards added.
	F7 F1.27 Second hand reclaimed bricks are always better than new replacements.	Noted.	Reference added that second hand reclaimed bricks which match the original has been added.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	F9 F1.38 Hot dipped galvanised steel or molten zinc spray are often a better choice than stainless steel. Do not use polished stainless steel as it looks brash and clinical in the countryside. You can double the life of galvanised finishes by suitable oil-based painting.	Agree. Add additional text. Marine steel more appropriate for 'modern' developments and galvanised for traditional.	Text amended as suggested
The Gower Society	F9 F1.39 Nice to quote Kennoxstone Farmhouse but who is likely to use ox blood these days? Suitable earthy/ochre colours can be obtained for colouring limewash.	Noted. The point is that not all houses were traditionally white or light colour.	No change
	F10 Not certain if this is the place to plug for leaving access into roof systems for swifts and house sparrows?	Agree. Text to be added re: access for bird species and links to module H, the Biodiversity and Development SPG and the Householder Design Guide SPG	Amended as suggested by inclusion of new paragraph F1.49.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	MODULE 5G A SUSTAINAB	LE DESIGN APPROACH	
NRW	G1.28 - We recommend that a section on how to best design solar panels and passive approaches in a way that does not detract from the character of traditional buildings and integrates with a building would be useful here and could relate to the residential guidance.	Additional text added together with a new paragraph regarding PV and historic buildings.	Additional text in G1.35 and new paragraph inserted re; historic buildings and pv.
	G.11 (Table) - Solar panels on roofs as well as those which are free-standing can detract from views, as well as having visual impact and potentially cause glint and glare.	Table will be amended to include reference to glint and glare	Table on G.11 to be amended
The Gower Society	G2 Where does Mrs Tiggy Winkle fit into the text. Essential though!	The image fits in with para G1.9 in relation to biodiversity and the need to help reverse the decline of biodiversity in Wales.	None

Organisation	Comments	Council's Response	Changes proposed to SPG document
	G3 Top photo why? Bottom photo does it fit into the text?	Top photo is an example of an eco-building. Acknowledge it is located outside Gower, but this is clear in photograph title. Cliff House is designed as a high energy efficient, low carbon home.	None Amend label of Cliff House image (G3) to explain that it is an energy efficient, low carbon design.
	G7 Nothing local for photos?	Unable to source local photos for this draft version of the Guidance. Will attempt for final version	No change
	G7 Same again but not Down to Earth as an example please/	Unable to source local photos for this version of the Guidance. Will attempt for final version	No change
	G8 Black frames and internals essential for solar panels. You do not notice them. There is no excuse for not using them.	Additional text inserted at G1.35	New text added at G1.35

Organisation	Comments	Council's Response	Changes proposed to SPG document
	G9 Is biomass still favoured. The pellets are a con.	It is recognised as a low carbon technology. Some 75% of locally owned renewable heat capacity installed in Wales in 2018 came from biomass projects (Energy Generation in Wales, 2018, Welsh Government)	None
	G10 Hydro highly unlikely on Gower although there were quite a few water mills.100 years or more ago.	There may be scope for some micro-hydro.	None
	G12 Do you consider that any source of wind power should be considered within the AONB?	G1.52 clearly states that 'small scale wind turbines may be acceptable on Gower within the aesthetic of commercial and agricultural holdings.'	None

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	The sustainable design approach should include guidelines for Air Source Heat Pumps as a commonly used and useful addition to domestic and commercial sustainable energy inputs.	Add text re air source heat pumps.  Ensure reference is made to inconspicuous location and need to have regard over potential noise issues and neighbour concerns.	Information for air source heat pumps has been added.

**QUESTION 3**: Does module **5C:Commerical Signage and Tourism** provide clear advice for applicants in relation to commercial advertising and signage?

Just one consultee thought that the module failed to provide clear advice.

## QUESTION 3a: If No, please explain how it can be improved

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	this is such a poor consultation	Noted.	None
Member of the public	enforcement essential	Agree.	None
The Gower Society	C1 C1.2 In the penultimate sentence should the word 'visual' be inserted before "environmental, social or cultural impact"?	Yes.	Amendment made as suggested

Organisation	Comments	Council's Response	Changes proposed to SPG document
	C9 Possibly worse examples on Gower than the café at Oxwich.	Agree. It has been difficult to obtain new images of 'bad' examples due to Covid restrictions, which have resulted in fewer advertising boards/hoardings. The situation will be monitored and should 'bad examples' occur prior to the final version of the document being printed, they will be included. Image to be replaced by image of road signage.	Replace image
	C10 Is it strong enough to say lighting of signage should be avoided. The example shown is in fact illuminated but it is very subdued and acceptable.	Agree, amend C1.27 to say 'Excessive lighting of signage should be avoided'	Amend C1.27 as suggested.
	C12 third para down is not strong enough in our opinion.	It is considered to paragraph provides strong enough guidance.	None

	C1.36 Flags and banners should be banned. 5 vertical flags on display at Rhossili.	C1.35 Not all flags are unacceptable (for example in association with schools). They require consent and would be assessed on their merits. C1.36 clearly states that temporary banners are not encouraged and only acceptable in limited circumstances	None
	C13 Enforcement and Education are the key words here.	Noted	None
NRW	Environmental Colour Assessment is a useful tool that could also be referred to - A1.40 references colours complementing landscape, as does B1.15 (in relation to agricultural buildings), along with C1.12 (the colour & materials section) in Commercial and Tourism.	Agree. Reference to environmental Colour Assessment will be added to paragraph C1.12	Amend C1.12 as suggested.

**QUESTION 4:** Does **Module 5E Chalet Developments** provide clear advice to owners/developers of residential chalets?

The majority of respondents agreed that the module provided clear advice to owners/developers of residential chalets.

# QUESTION 4a: If no, please suggest what amendments could be made to make it clearer

Organisation	Comments	Council's Response	Changes proposed to SPG documents
Member of the public	In the Chalet section there is a guideline that wall construction should be solid. In fact sustainable design should include permission for stud walling infilled with eco insulation such as warmcell or other sustainable/energy efficient insulation. Block wall building is less energy efficient, and much less suitable for self-builders. As a large percentage of chalet renovations and re-builds are carried out as self-builds, this should be referenced, supported and taken into account in the guidance.	Agree	E13, E1.2 Remove bullet point B which refers to solid construction.
The Gower Society	E1 poor photo.	Noted. Image illustrates the development effectively screened by trees and hedgerow.	None
	E2 E1.9 the location has been changed that there is little relation to what it looked like orginally.	Unclear what this comment refers to.	None
	E5 E1.17 The 1984 Guide was never followed very well. It is essential that the new section is.	Noted	None

Organisation	Comments	Council's Response	Changes proposed to SPG documents
	E6 E1.22 A damning statement!	Agree and the point must be made.	None
	E8 Miles Lane. Makes you think why bother?	Noted. Miles Lane is listed within current LDP policy. Whether it retains sufficient characteristics to continue as a named chalet site can be re-examined at LDP full review.	None
	E9 Sorry but it does beg the question as to how we arrived with this?	Noted	None
	E13 We support standard galvanised corrugated sheeting as well a rolled zinc on site as well as for rainwater goods.	Noted. Amend text in E1.24 e to reference use of standard galvanised corrugated sheeting as well a rolled zinc on site as well as for rainwater goods. Colour coating for all raw corrugated metal sheets and zinc roofing sheets.	Amend E1.24 e as suggested

Organisation	Comments	Council's Response	Changes proposed to SPG documents
Mr Dixon	The design guidelines for Sandy Lane rule out 'dormer-style roofs', which has a very specific meaning. However, on seeking advice, I was told that this rule was meant to exclude ALL attic rooms, even those without dormer-style window openings. I was promised clarification on this, but that has never happened, so I still have no idea what this rule is meant to convey.	Text will be amended to clarify. Guidance states that first floor accommodation may be acceptable, but must be subservient roof accommodation in Sandy Lane, Harslade and Miles Lane.  Amend text in box in para E1.25. Bullet points b, c, d & f are relevant to all named chalet sites. Bullet points a & e are relevant to Holtsfield and Owens Field only.  Clarity that at Hareslade, Sandy Lane and Miles proposals for 2 storey and dormer style developments will not be permitted. However, first floor accommodation may be acceptable, but must be subservient roof	Amend page E12. E1.25 a and e.
		accommodation. The roof pitch of the redeveloped	

Organisation	Comments	Council's Response	Changes proposed to SPG documents
		chalets shall be up to a maximum of 35 degrees.	

**QUESTION 5:** Is it clear that **Module 5C Chalet Development** refers to all residential chalets, not just those located in the named chalet communities?

Yes 4 ()

No 3 ()

**QUESTION 5:** Is it clear that **Module 5C Chalet Development** refers to all residential chalets, not just those located in the named chalet communities?

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	Show both example types to be clearer	Noted.	Will source image for final version of document.
Mr Dixon	I didn't understand that having read the document, nor have any of my household who have read the document independently. It needs to be stated more clearly		Amendments have been made to document.

**QUESTION 6:** Does **Module 5H Landscape** provide clear advice for applicants/developers in relation to Green Infrastructure and biodiversity?

The majority of respondents stated that the Module provided clear advice for applicants/developers in relation to Green Infrsatructure and biodiversity.

QUESTION 6a: If No, please suggest how the advice could be improved

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	i dont even understand the above sentence	Comment not understood	No change
Member of the public	enforcement if ignored is not strongly worded	Noted	No change
NRW	H1.11 - this section is somewhat generalised, as there are important woodlands in Gower (e.g. the photo included in this section of Oxwich Bay and a number of woodlands are coastal in character). We also recommend that the comment about 'very little tree or large shrub cover' needs to be qualified and should relate back to the landscape.	Agree. Text has been amended.	Amend text.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	character areas with regard to the type of vegetation characteristic. There is considerable amount of coastal scrub on Gower, including both gorse and hedgerows lining lanes and defining field boundaries		
The Gower Society	H1.76 this appears to be the only mention in the document of that feature of modern suburbia, the close boarded fence, which, like wheelie bins and leylandii hedges can so easily get out of hand. The selected pictures are a bit tame; a better example might be the fence along the road frontage of a large modern house at Little Reynoldston, just up form Eynons Ford, which is also an example of the current vogue to have the fair face inwards and the supports (or innards) of the fence facing out.	Add text in relation to close boarded fencing – should be painted green or dark colour and softened with planting to blend in with landscape.	Amend H1.76.
	H4 The photo on the RH has alien plants for Gower. Is it suitable?	Yes. As stated in H1.15 Cordyline is non-native but if used sensitively can help strengthen the coastal characteristic of the area.	No change

Organisation	Comments	Council's Response	Changes proposed to SPG document
	H7 The trees and hedges on Gower have insufficient protection. Enforcement is an issue or lack of it.	Noted. Many are protected under the Hedgerow Regulations. Enformcement can only take place if notified of unauthorised works.	No change proposed
	H17 Recycled traditional and local materials are always better than new. Especially if imported from China or India!	noted	No change
	H16 Modern water-based protection systems are often the wrong colour and traditional modified creosote substitute is recommended.	noted	No change

Organisation	Comments	Council's Response	Changes proposed to SPG document
	H1.76 This appears to be the only mention in the document of that feature of modern suburbia, the closed boarded fence, which, like wheelie bins and lylandii hedges can so easily get out of hand.  The selected pictures are a bit tame; a better example might be the fence along the road frontage of a large modern house at Little Reynoldston, just up form Eynons Ford, which is also an example of the current vogue to have the fair face of the face inwards and the supports (or innards) or the fence facing out. The half-timbered house does not help either.	Add text to paragraph:  'If proposed, such fencing should be painted with dark/green colours and softened with planting in order to blend into with the landscape'.	Amend as suggested

**QUESTION 7:** Does **Module 5I Lighting** clearly link with Policy RP 3 and provide clear advice and guidance for developers and applicants with regard to lighting within and adjacent to the AONB

The majority of respondents thought that the Module provided a clear link with Policy RP3 and clear advice and guidance for developers and applicants.

## **QUESTION 7a:** If No, please suggest how the advice could be approved.

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	the language used throughout this consultation is too technical for most people to understand therefore i wonder how effective this consultation is	Noted. By the nature of the subject the module is technical.	None
Pennard Community Council	Too many examples too confusing for a layman	noted	None
The Gower Society	13 One of the worst examples on Gower is the view to Machynys Golf Club and the two sodium lights at Scurlage surgery as well as the sodium light at 3 Cliffs Caravan Park, Also the new housing lighting at Scurlage Monksland road.	Noted. The Council has little control via the planning system over existing lighting. It is hoped that this module will result in less light pollution from new developments.	None
	16 The section is good but is the white light detail correct?	Yes. The diagram is adopted from Northumberland National Park Lighting Guidance.	None

Organisation	Comments	Council's Response	Changes proposed to SPG document
	110 We see no mention of keeping the modern trend for glass box houses and the effect on light pollution.	Text has been added to the module.	Text added in relation to light spill from developments with large window voids.
	118 How do you get around the legibility of these diagrams	Noted. We have obtained new diagrams which hopefully are clearer.	Diagrams replaced with ones of better quality.

**QUESTION 8:** Does **Module 5I Lighting** clearly set out what developers/applicants are expected to include within a Lighting Plan?

The majority of respondents thought that the Module provided clear guidance as to what to expect to include in a lighting plan.

**QUESTION 8a:** If no, please suggest how it can be improved.

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	the language used through out this consultation is too technical for most people to understand therefore i wonder how effective this consultation is	Noted and agree. It is a technical document, designed to aid lighting strategies and plans.	none

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	But new developments need to be inspected on completion and amended if outside of lighting plan	Noted. Breaches of planning permissions are reported, enforcement action can be taken.	none
Pennard Community Council	More consideration to simplify it for people not qualified in this area.	This section of the document is technical, in order to reflect the level of detail required in a lighting plan.	none

**QUESTION 9:** Are the settlement statements easy to understand and do they provide clear guidance as to the character of each settlement?

The majority of respondents thought the settlement statements are easy to use and provide clear guidance.

QUESTION 9a: if no, please suggest how they could be improved.

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	updating is hopefully strong enough for next development clarity	noted	No change proposed
NRW	Although the title is Settlement Character Areas & Settlement Statements, the first section relates to the Landscape Character Assessment, including Landscape Character Area descriptions, special qualities and key characteristics and management guidelines. Therefore, it would be helpful to differentiate the two sections and explain how they relate to each other.	There was an error with the layout of Appendix 5 and 6. Paragraph Ap5.11 refers to the tables, as does Ap6.7. the tables will be moved to Appendix 5 and paragraph Ap6.7 deleted. Additional text has been added to Ap5.11 to explain the tables provide the wider landscape context for each settlement and detailed settlement statements are set out in Appendix 6	Move Tables to Appendix 5. Amend Ap5.11. Delete Ap6.7
Pennard Community Council	They are clear but often inaccurate	Noted	None

Organisation	Comments	Council's Response	Changes proposed to SPG document
The Gower Society	Middleton - better photo of Middleton possible?	noted	No change at present
	SS49 Oxwich - Llanmadoc photos used in error!	Acknowledged this is a formatting error and will be corrected	Delete photographs of Llanmodoc and use correct photos
	SS Southgate - Reynoldston photo's used in error!	Acknowledged this is a formatting error and will be corrected	Delete photos of Reynoldston and use correct photos.

QUESTION 10: Are extracts from relevant Seascape Character Areas included within Appendix 7 of the Design Guide?

All respondents agreed that the extracts were correct.

## **QUESTION 10a:** if no, please state which additional SCAs should be included.

Organisation	Comments	Council's Response	Changes proposed to SPG document
NRW	We advise that it should be clarified that Carmarthen Bay East is Seascape Character Area (SCA) 2.	Agree. Text will be inserted on first line of paragraph as follows:  'The Seascape Character Area (SCA) 2'	Amend as suggested
	We also recommend that additional clarification should be provided on mapping & legend names of SCA's in the various plans/drawings.	The plans and drawings are extracted from the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment 2016 and cannot be amended.	None
	Furthermore, a brief introduction explaining the Seascape Assessment and why it is important and how to use would also be helpful.	Agree, a new paragraph has been inserted at the beginning of the Appendices which links to Section 2 of the Design Guide and introduces the Seascape Character Assessment.	New paragraph inserted at beginning of appendices

## **SECTION 3: FURTHER COMMENTS**

**QUESTION 10b:** If you have any other comments on how the SPG could be improved, please specify below?

Organisation	Comments	Council's Response	Changes proposed to SPG document
Member of the public	The guide itself is comprehensive and supports sensitive development in Gower. The issue is how it is applied to developments - and when it is expedient for planning authorities to ignore the guidelines in the interests of commercial gain.	Comment noted. When notified of breaches of planning consent, the Council will pursue enforcement action.	No change proposed
Member of the public	you should give it to a person with the reading age of 10 years which is the average reading ability for all documents	Noted. The document may be perceived as complex due to the technical nature of some of the topics within it.	The general legibility and layout of the document improved.

Organisation	Comments	Council's Response	Changes proposed to SPG document
Pennard Community Council	We disagree with the statement that Southgate, Pennard and Kittle are "strongly urban influenced". The historic sites in the statement are not comprehensive and do not include, for example, the castle, church ruins, pound, limestone kiln or well. It also does not make reference to SSSIs within the ward. We also disagree with the inclusion of "settlement expansion and development of settlement edges" being included in the management plan for these villages. While Southgate was identified as a key village in the LDP, the other villages were not. In addition, the expansion to Pennard within the Southgate Ward is already underway and no further expansion is permitted within this LDP. We would like this removed prior to approval and publication. Appendix 6, Southgate and Pennard have no "ss" number alongside the title and the second set of four pictures do not match the descriptions. We are happy to discuss these issues with you in more detail.	Pennard and Southgate was not included within the original Design Guide as the consultants considered that the settlement has an urban character through their building form, density and layout. In order for consistency the key village was included in this revised docment, but the fact remains that the built form is strongly urban influenced. The phrase will not be removed.	

Organisation	Comments	Council's Response	Changes proposed to SPG document
		A previous version of the settlement statement has been included in error and will be replaced. The content and layout of the statement is however, exactly the same as all the others in the document. No statement has all the historic sites listed. No change proposed.	Amend settlement statement as previous version has been inserted into document.
		Kittle has the urban settlement boundary around it.	Tables summarising the landscape character areas will be moved from appendix 6 to 5. Text will be inserted to clarify that the text is extracted from the Gower Landscape Character Assessment, 2013.

Organisation	Comments	Council's Response	Changes proposed to SPG document
		The phrase "settlement expansion and development of settlement edges" is from an unedited extract from the Gower Landscape Character Assessment (LCA) 2013, produced by specialist consultants John Campion Associates Ltd on behalf of the Gower Landscape Partnership, as an independent assessment of the special landscape. Specifically, it is one of the Management Guidelines for Landscape Character Area 26: Southgate and Pennard, which includes the settlements of Bishopston, Kittle, Pennard and Southgate. The LCA was produced prior to the LDP, but used as an evidence base document for the LDP.	

Organisation	Comments	Council's Response	Changes proposed to SPG document
		The LCA provides a much more detailed look at the landscape of the AONB than using just the LANDMAP information (which formed the basis of the existing AONB Design Guide), so it is important to incorporate this into this revised version of the SPG. The Management Guideline should not be read as referring explicitly to any potential development of the village, but rather as providing a design principle that should be taken into account if any applications are ever submitted. This is also applicable for schemes within the village, which are adjacent to the boundary.	

Organisation	Comments	Council's Response	Changes proposed to SPG document
		By incorporating relevant extracts into the SPG, the design principles and guidelines of the LCA can be afforded a degree of weight in any planning decision. As the extracts are word for word from an existing document it will not be changed. However, comments will be added to the introduction of the chapter clarifying that the text is extracted from another document. It is important to keep in these extracts, as it sets out design principles and guidelines that should be considered IF any development proposals do come in, either on the edge of the village, or adjacent to the boundary. National planning policy (and the LDP) do	

Organisation	Comments	Council's Response	Changes proposed to SPG document
		permit affordable housing schemes adjoining settlements, subject to a number of considerations and therefore it is possible that we will have such applications coming forward in the future. By including the statement within the new AONB design guide it ensures that distant views and landscape impacts are taken into consideration when considering any such application, in order to protect village form.	

Organisation	Comments	Council's Response	Changes proposed to SPG document
Lynda James	1. The document is too large and cumbersome, there is no need to have so many photographs. As the document is mainly used on line it needs to have links to negotiate the various sections. There are several errors in the Pennard section. The second set of photographs are incorrect. The comment concerning any future extension to the village area should be removed as the extension has already occurred. There are no further extensions included in the LDP.	Links will be added in the final version of the document. The Pennard and Southgate settlement statement is an old version which has been included in error. Wrong photographs have been included in the Pennard and Southgate settlement statement. These editing errors will be corrected.  There are no explicit references to the future extension of the key village in the document (see above comment).	Add links to final version of document (not to the reconsultaiton version)  Amend the Pennard and Southgate settlement statement.

Organisation	Comments	Council's Response	Changes proposed to SPG document
E Fussel	I thought your new planning regulations for this very special area were excellent, especially the section on bio diversity and hedgerows. Please can you make sure they are stringently applied. I live opposite Coastal's development on Pennard Drive it is very ugly and overcrowded as one of the councillors who voted for it said. Can you ensure that this vandalism of this precious AONB never happens again. It makes a laughing stock of the regulations.	AONB designation does not prohibit new development. The development was assessed against placemaking principles of LDP and current AONB DG SPG.	None
The Gower Society	The Gower Society's Response to AONB Draft Design Guide. We have studied all three of the consultation documents over the last four weeks and congratulate those involved in what must have been a huge task in their preparation. The documents are very good, but one common question has been raised on all three and in all sections. How are the various admirable aims to be implemented and regulated within the current Planning regime? We suggest that it is pointless producing a document of this quality with such clear and well intentioned aims that does not have the full backing of the City and County of Swansea elected Members and Planning Officers to both implement in new applications as well as enforcing long running infringements. The description of the planning "process" through from the	Noted.  Nature of issues and topics has led to a very large, detailed Guidance document. Links throughout the final version of the document should help make navigating it easier.  Images have been replaced wherever possible. Further suggestions for images for the final document are welcome.	None at present

Organisation	Comments	Council's Response	Changes proposed to SPG document
	macro to micro levels is clearly described and comprehensively, too. (If there is a criticism it is that there is so much of it. But we would hesitate to leave any of it out!) It is an excellent document. The one unfortunate consequence of such a clear and comprehensive guide is the mismatch between that, (which one might term theory or policy) and the practice, which is enforcing breaches of planning control (including breaches of planning conditions). (Whatever may be the reasons for this: resources, management priorities, political will or other.) The 400 or so pages that are embodied in this document, whilst in the main is relatively easy reading, are bound to daunt many applicants. We wonder if you have considered whether a 'shortened basics version only' could be produced, that would be more easily understood, by less professional and qualified readers? We have annotated the full AONB Draft (Addendum 1) with small notes and comments that we hope that you will take as being a positive contribution. There is nothing major, but we think that it may be worth your while, at least considering them as it may improve the end result. From these notes you may consider the viability of reviewing some of the scenic picture content (that do not appear to fit comfortably in with the text) that may contribute to a small reduction in examples have occurred within the AONB, although regrettably there are still plenty of poor ones. Our own		

Organisation	Comments	Council's Response	Changes proposed to SPG document
	Gower Society's full list of its Design Award Winners since 2003 is attached (Addendum 2, but they are not all above criticism) for reference and thoughts on possible good examples the overall size of what is a lengthy document. A recurring theme for comment has been the inclusion of photographic examples from outside the AONB and indeed outside Wales. This may be mainly associated with the original International Consultants Nathanial Lichfield's document and their lack of decent local examples at the time. In the last 10 years better		
Steve Lucas Wales Officer \ Species Policy & Legislation BATS.	It would be good if lesser horseshoe bat populations are highlighted in this somehow. The populations on Gower are considered to be a distinct genetic clade and that makes their conservation vitally important – not just barn conversions but also lighting. We are working with a consortium of other NGOs to submit a HLF bid to cover a variety of projects one of which is a project to look at how\if LHBs are moving in\out of the Gower. If it gets funding, we don t expect results for about 4 years which wont come in time for this piece of work so perhaps something broad reflecting the importance of LHBs in the guidance might be sufficient for now.	This was not a response to the AONB DG consultation, but to the Biodiversity and Development consultation document. However, it is relevant to the GOWER DG biodiversity section and should be considered as part of this consultation.	Add explicit reference to lesser horseshoe bats in paragraph D1.8 (Conversions) and para I (Lighting).

Organisation	Comments	Council's Response	Changes proposed to SPG document
Mr Dixon	Chalet Developments makes a serious mistake in lumping together all chalet communities on Gower and treating them equally. For instance, the character of Owens Field with its very small, quite temporary, quite basic chalets is vastly different from Sandy Lane, with its larger, much more substantial, much more established housing. As a result, Owens Field is a community of mostly younger people, with very few families, who are prepared to rough it a little. If you try to shoehorn Sandy Lane down into the same model, with very small chalets from a bygone age offering no realistic family accommodation, you will be distorting the current nature of Sandy Lane and forcing it to regress to be more like Owens Field. The horse has left the stable and bolted here - Sandy Lane is no longer the same as Owens Field, nor Holts Field, and to a lesser extent nor is it like Hareslade. If you lump all the chalet communities together as you have, you will be forcing an inappropriate one-size-fits-Dall model onto communities for which it is a very bad fit. Please think again and regulate development of these communities differently. The Sandy Lane of today is a thriving, family, orientated community, so please don't force it to regress back to the same state as Owens Field, where the very small size and highly constrained nature of the accommodation make it impossible to raise a family.	The Module clearly distinguishes between chalet communities.  The fact remains that Sandy Lane is located outside settlement limits and therefore must be considered against national and local policy relating to development in the countryside.	none

Organisation	Comments	Council's Response	Changes proposed to SPG document
Mr Dixon	Section 5E on chalet communities states that Sandy Lane is to be treated as a chalet community, in the same way as, for instance, Owen's Field. It also treats Sandy Lane as 'open countryside' for planning purposes. Both these notions seem bizarre, and wouldn't survive a five-minute stroll through Sandy Lane. It also seems apparent from an open-minded examination on the ground that the natures of the homes in Sandy Lane and Owen's Field are not really very similar at all, and have more differences than shared points. Owen's Field is effectively what Sandy Lane was 40 years ago, and to treat them the same for planning purposes is an extremely blinkered approach which appears to wilfully ignore reality in pursuit of some theoretical goal. Sandy Lane has developed far beyond some other chalet communities on Gower, to the point where it has far more in common with a residential area than open countryside. As the chalets on Sandy Lane have reached the end of their natural lives and been replaced with new dwellings, they have naturally developed in line with the family-orientated nature of the community there, and dwellings have increased in size to accommodate family living. Whilst Sandy Lane is very much a family-orientated community, Owen's Field, for instance, has	Sandy Lane is located within the countryside as defined by the LDP, policy CV2.  The Module clearly distinguishes between chalet communities.  The Module allows Sandy Lane chalets to have rooms in the roof space. This will be clarified.	Advice relating to accommodation at first floor level is clarified.

Organisation	Comments	Council's Response	Changes proposed to SPG document
	almost no families, because the fairly primitive accommodation offered there doesn't allow for modern family life. To apply the same 'replacement dwelling rules across these two separate chalet communities, not allowing Sandy Lane replacement dwellings to have upstairs rooms and constraining them to the same footprint as the original dwelling, you are attempting to force Sandy Lane to go back in time 40 years. The net result will be those who have already replaced their homes in the natural cycle of renewal will have modern houses which offer family living, those who have yet to do so will be hugely disadvantaged. This seems arbitrary, unfair, and against the principles of natural justice. It would be more appropriate to take into account the considerable and very different development which has taken place at Sandy Lane, and make far more allowance for that in the design guidelines for that community.		