

Annex A – Consultation responses and feedback – By Chapter/Section

CONTACT	COMMENT	RESPONSE
	General Comments and Chapter 1: Introduction	
The National Trust	<p>National Trust and land ownership</p> <p>National Trust is a leading conservation charity with 4 million members. Established over 115 years ago, our primary statutory purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over a quarter of a million hectares of land; more than 700 miles of unspoilt coastline and estuary; several hundred historic houses; gardens and parks, and 6 World Heritage Sites. More than 100 million visits are made every year to the properties in our care.</p> <p>The National Trust’s charitable purpose is the permanent preservation of places of historic interest and natural beauty for the benefit of the nation. Although independent of government, we have been given the unique ability to declare our property inalienable, meaning that it cannot be sold and that it will be protected for ever, for everyone.</p> <p>The National Trust is one of the largest land owners on Gower. The Trust owns and cares for 26 miles of unspoilt coastline on Gower, including the award winning Rhossili Bay, the secluded Pwll Du, and the tranquil Whiteford Burrows. Our shop and visitor centre at Rhossili is open 7 days a week and has the most amazing views over Rhossili Bay and Worms Head. The Trust provides accommodation on Gower, we have a bunkhouse and four holiday cottages which sleep between 5 and 10 people. Our sites provide for many day visits to Gower with car park, catering and various service facilities for the visitor to Gower. Our role is thus fundamental to the management of and contribution to the Gower AONB.</p>	Noted. No amendments required.

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	<p>The National Trust welcomes the publication of the Consultation Draft AONB Management Plan, and are proud of our contribution to, and management of issues emerging from the first AONB Management Plan. We believe we have an important role to play in ensuring the future management of the Gower AONB and ensuring an appropriate balance is struck in management and planning decision making within our land portfolio on Gower. We believe we have an important role in ensuring the qualities of the Gower remain and acknowledge the crucial role the Management Plan has in establishing an appropriate direction of travel.</p>	<p>Noted and welcomed</p>
	<p>In overview, the Trust is concerned about the level of resources being made available to AONB issues, and concern about the overall level of funding available within the local authority. The funding and budget settlements within the local authority should not lead to any diminution of the resource available to fund the management of the AONB and the practicality of the implementation of the AONB Management Plan. The draft plan takes forward the Actions to Achieve the 5 year objectives without detailing the specific funding requirements of the AONB team. It is accepted that the local authority will fund the nominated actions and associated monitoring programme for the Management Plan. Any decrease in funding for AONB activities would not be supported by the Trust.</p>	<p>Noted, but the actions and monitoring programme are for the Partnership, not just the local authority. Delivery is dependent on the availability of funding – either from partners existing funding or securing resources from other sources</p>
	<p>Support is given for the adoption of the Management Plan as Supplementary Planning Guidance, and its early adoption will ensure that the issues are included within the emerging Local Development Plan for the Gower and early recognition of the special qualities and importance of the AONB. The Trust is happy to contribute to evidence gathering for AONB issues if this would assist in ensuring early recognition of the special qualities of the AONB in the preparation of the AONB. It is recognised the Welsh Government challenge on workloads and evidence base associated with the LDP preparation, and the value of the Management Plan in supporting the LDP moving forward.</p>	<p>Noted and CCS will take forward with NT. No amendments required to the Plan.</p>

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	<p>The Trust recognises the increased emphasis given to biodiversity issues and the wider breadth of resource that is acknowledged in the draft Management Plan for biodiversity. The Trust also acknowledges the key role its land holding has in moving forward a number of biodiversity objectives on the Gower. The Management Plan takes forward biodiversity monitoring through the Swansea LBAP process. The Trust land holding will take forward actions on all of the priority action areas including: the South Wales Valleys Marshy Grasslands; Gower Coast Limestone Grasslands and Heathlands; Gower Commons; Gower Arable; Coastal Soft Cliff; Welsh Sand Dunes.</p>	<p>Noted and National Trust actions welcomed</p>
	<p>The Management Plan recognises the longer term effects of predicted climate change on the key habitats and species within the Gower AONB, but also recognises that the effects have not been assessed. Change within a number of Trust land holdings on the Gower will be effected by climate change within the timescale of the Management Plan and the implementation of shoreline management plans could be specified within the draft Plan. The Trust will contribute information to the monitoring of the plan where key habitats and species are affected by climate change.</p>	<p>Noted and National Trust added to lead partners in Action Plan for Objective 1.</p>
	<p>The Activities and Pressures Chapter of the Draft plan recognises the current commercial interest that has been expressed in the area in relation to possible coal bed methane extraction and potential gasification development in the area. Given the Plan will be potentially taken forward as SPG greater information may be required in this area of the plan to prevent inappropriate development of such resources in or adjoining the AONB. The National Trust has a policy in relation to fracking which is attached for your information. A policy in relation to gasification is currently being developed with serious concerns being raised about potential development in proximity to the Gower AONB.</p>	<p>Issues and National Trust policy acknowledged</p>
<p>The Gower Society</p>	<p>1.1 line 3: 59k = 37 miles, not square miles. Delete 'The' before '59' (line 3), as otherwise the whole coast appears to be Heritage Coast.</p>	<p>Line amended</p>

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	1.4 %age figures for each owner would be useful information here.	Added the percentage figure for the National Trust (70%) as the only figure available at this time.
	1.6 Remove 'However', since this sentence has no logical connection with the previous one and could seem to suggest some limitation of the LPA role. In line 2, add 'the' before 'continued'.	Line amended
Natural Resources Wales	<p>We welcome the work that has been done on this review and the Draft Plan's clear focus on Actions that work towards achieving the 20 year Vision. Whilst we consider that certain parts of the Plan, which is generally sound, require further work a number of these points are included in, or covered by recommendations for amendments to the commitments in the Action Plan, we advise that these will need further consideration in terms of prioritisation within the Plan period.</p> <p>We also welcome that many of our comments on the Draft State of the AONB report consultation (August 2013) have been incorporated and find the cross referencing through use of hyperlinks a helpful feature of the Plan.</p>	Noted.
	<p>It is acknowledged in para 1.18 of the Introduction that the Plan and Policy context has changed significantly since the 2006 plan was published. Particularly relevant, as stated, will be the developing City and County of Swansea Local Development Plan (LDP) and the recent Welsh Government legislative programme including the Environment Bill, Planning Bill, Heritage Bill and Wellbeing of Future Generations Bill, which are currently entering the scrutiny phases, also WG Shared Outcomes and the new RDP. These will need particular consideration in future in the context of any changes that result from review of governance of designated landscapes. Reference is made at various places within the Plan to a number of these documents/policies but it would be helpful to include clear references upfront within the Planning and policy update to ensure the drivers and forces for change are identified and responding to</p>	New paras 1.23 and 1.24 added to outline recent policy changes and current legislative agenda/review.

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	<p>relevant key issues. It is also worth noting that a number of national planning policies have been recently updated, for example TAN 5, TAN12, TAN 16 and Planning Policy Wales. We welcome the reference to the Local Biodiversity Action Plan (LBAP), and River Basin Management Plan (RBMP) reviews.</p>	
	<p>NRW recommends further integration of the ecosystem approach into the draft Plan following the recent work carried out by Craggatak on behalf of Natural Resources Wales (Ecosystem Approach for Protected Landscapes Management Plan Reviews, March 2014). In particular sections 6.8 to 6.15 (p24/25) - Practice of an ecosystem approach. The draft Plan does address many of the 12 Convention on Biological Diversity principles but it would be helpful to clearly set out how the Plan does this. We welcome the proposal to develop understanding of ecosystem services and benefits provided by the AONB (objective 13 p104) and the intention for an ecosystems services mapping exercise in the AONB. In addition, we recommend an analysis of the condition of ecosystem services in relation to the special qualities and where possible to identify the limits of change (see Craggatak report page 24). This should be carried out during the Plan period. It may also be useful to tie in the results of the ecosystem services work above to Objective 38 Increasing Public Awareness and fully promote and publicise the services and benefits of the AONB more widely.</p>	<p>Natural Resource Management/Ecocystem Services approaches to the AONB Management Plan are being developed in collaboration with NRW and the other Designated Landscapes in Wales. This work will feed into the next Plan review.</p>
	<p>NRW welcomes the intention to carry out an assessment of the vulnerability of the Special Qualities to climate change and that these are included in the Action Plan for biodiversity, geology, key landscape/seascape features as well as archaeology and built heritage. Please see our detailed comments under Chapter 4 The Vision.</p>	<p>Noted. No amendments required.</p>
	<p>The evidence base for trend analysis on the condition of the Special Qualities requires further work but we acknowledge that comparative data can be difficult to source. The evidence for policy review needs to be clear and robust. Therefore we suggest a pragmatic solution that an amendment be made to the Action Plan to prioritise the collation of updated information on the state of Gower's special qualities in readiness for a full review of policy next time.</p>	<p>To be considered as part of the Natural Resource Management approach to the next Plan review</p>

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	Finally, we are pleased to note an action for developing a clear understanding of the recreational activities in the AONB and around the coast which will identify priority issues for planning and management (with an initial review and audit completed) and the action for engaging with the RDP and Glastir opportunities as well as collaborative work on strategic wildfire protection and prevention initiatives for the Gower Commons	Noted. No amendments required.
	Para 1.16 (p7) Fourth bullet point. NRW were also consulted and provided a response to the State of the AONB consultation in September 2013.	NRW added
	Para 1.18 It is noted that the Plan and Policy context has changed significantly since the 2006 plan was published, with updates inserted. However, please see general comments above re additional policy and plan drivers	Noted and amendments detailed elsewhere
	It is suggested that the introduction includes specific reference to Gower being an economic, environmental and social asset of national importance. With economic challenges, new approaches & synergies will be needed in line with the ecosystem approach and we recommend this is reflected in the Action Plan. We would also welcome further emphasis on the emerging Wellbeing agenda and natural resource management planning	To be considered as part of the Natural Resource Management approach to the next Plan review
	Para 1.21 It would also be helpful to state (currently text box to be removed from the final version) that the Gower AONB Design Guide has been adopted as SPG and to provide a hyperlink.	Inserted
	We welcome the reference to Heritage Coast, but recommend that a definition is provided and clarification as to whether the aims of the Heritage coast are covered by the Plan	New paragraph 1.8 to address
	Chapter 2 Resources	
Natural Resources Wales	We note that this chapter is essentially an update to the Draft State of the AONB report and support the renaming as “Biodiversity” for Special Quality 1 (formerly “Wildlife”) <u>Biodiversity</u>	See specific responses in BOLD CAPITALS in the Comments column
Natural Resources	Para 2.7 It is noted that the LBAP will be cross referenced rather than summarised here. It may however be helpful to provide an update in para 2.7 of the Policy context	

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Wales	<p>and review and then within the Current Trends to perhaps summarise some of the key trends or any areas of focussed research/management effort. SEE 2.11.</p> <p>2.11 A link could be considered for a Section 42 list (species) for Gower if a breakdown is available. NOT AVAILABLE</p> <p>2.12 Suggest para 1 amend first sentence to state “have <i>core</i> management plans” rather than “site management plans” and para 2 last sentence “The Relevant Authorities Group has developed a <i>draft</i> management Scheme for the site” AMENDED</p> <p>This section could provide some of the summary issues currently affecting biological SACs/SSSI in a similar way to that for geological sites e.g. over/under grazing, scrub encroachment, sustainable management of common land and management of invasive/non-native species. INSERTED</p> <p>2.15 <u>Crassula helmsii</u> is known from Broadpool and rhododendron is also present in some woodlands and on the edge of commons. INSERTED</p> <p>2.19 could consider adding monitoring/mapping known distribution or key areas of INNS. INSERTED</p>	
	<p>Geology</p> <p>2.20 – slight amendment to bullet point 2 “Quaternary deposits and landforms e.g. solifluction terraces overlying small remnants of ‘raised beaches’, cave sediments with associated fossils”</p>	Amended
	<p>Landscape</p> <p>We recommend that more use be made of two key data sources for the AONB: LANDMAP and the Landscape Character Area report for Gower. For example p21 Current and Future Trends: Landscape notes that Change Detection data is already available for Gower in Landmap. Visual and Sensory will be updated 2015 and landscape habitats in 2016. Therefore with Landmap updates being rolled out over the Plan period, it is possible to specify updating all 5 layers of Landmap for completion by the end of the Plan period (suggest add to objective 8 p 103).</p>	Amended

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	<p>It is also suggested that indicators make better use of the SWOT analysis in the LCA study</p> <p>2.34 Welcome commitment to revised photomonitoring programme that will build on experience in other protected landscapes (we emphasise the points made previously in our State of the AONB response)</p>	
	<p><u>Seascape</u></p> <p>Although categorised under 'natural', 'seascapes' is a mix of natural, cultural and perceptual factors.</p> <p>We note an appropriate monitoring methodology for seascape needs to be considered and developed. We note the baseline assessment being used is the 2009 one, which although not incorrect, is likely to be superseded during the life of the new plan by seascape character assessments, both the national scale one being done for the marine plan and the intended local scale one mentioned as proposed in the consultation document</p>	<p>Noted. Comments superseded as NRW and AONB Partnership are working on a Seascape Assessment for Gower</p>
	<p><u>Water Quality</u></p> <p>Within this section NRW should be referred to as the competent authority with regard to water quality/WFD issues</p> <p>2.99 Bathing water is subject to influences outside of the AONB – particularly discharges from the nearby conurbations (Swansea and Llanelli). The section conflates WFD and Bathing Water Directive issues. The following is a suggested amendment:</p> <p><i>Over recent years, huge improvements have been made to the quality, frequency and regulation of point source discharges into bathing waters. Further improvements may be needed in order to meet the requirements of the revised Bathing Water Directive. This is likely to involve actions and initiatives tackling more diffuse/cumulative pollution sources e.g. from agricultural diffuse pollution and septic tanks. Work is ongoing to understand and address these issues.</i></p> <p>2.100 (Groundwater) Plans for further development outside the sewered areas in Gower is often accompanied by pressure to allow the proliferation of septic tank and</p>	<p>All suggestions incorporated</p>

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	<p>package plant sewage treatment systems. In limestone areas this carries a significant risk of pollution to groundwater.</p> <p>2.101 Monitoring and indicators addition: Bathing Water quality of designated Bathing Waters, WFD compliance (including shellfish waters compliance)</p>	
	<p>Para 2.128 – identifies that recreational usage may already be changing in the AONB – is data available and does this form part of monitoring? Has this identified any potential or existing conflicts and management issues that require specific actions?</p> <p>As a general comment we consider the potential monitoring and indicators for all the access & recreation objectives could be strengthened and we would be pleased to discuss further. The Plan is also limited on access to inland water where relevant and higher rights of access (horse-riding etc.) We would be happy to discuss this further.</p> <p>Para 2.128 – it would be helpful to explain role of LAFs</p> <p>Para 2.136 - need to be clear the right of access is on foot only. Also need to be clear where any higher rights/ permissive access apply.</p> <p>Para 2.138 sentence needs to reflect fact that the maps have now been published.</p> <p>Para 2.139 – suggest change to 'A large proportion of access land is owned or managed by the NT.....' as it currently implies that NT land is publicly owned</p> <p>Para 2.142 - change to 'extent and accessibility of access land' as not all access land is publicly owned.</p>	<p>No data available apart from increase in visitor numbers. AONB to take forward with NRW re. provision, issues and monitoring. No plan amendments required</p> <p>Additional line added in 2.130</p> <p>Amended</p> <p>Amended and web-link to maps included.</p> <p>Amended</p> <p>Amended</p>
Natural Resources Wales	2.151 Designation of further bathing Waters could be considered and is welcomed by NRW.	To be taken forward with NRW.

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GGAT	Where there are proposals for improving historic assets including listed buildings, consultation should be made with Cadw; the Royal Commission on the Ancient and Historic Monuments of Wales and GGAT.	2.77 amended
	The archaeological research framework for Wales http://www.archaeoleg.org.uk/intro.html guides research and understanding for the archaeology and cultural history of Wales; any proposed works or projects should take the current aims and framework into consideration.	Noted
	The visual impact of various developments on the setting of Scheduled Ancient Monuments, the Registered Landscape, Registered Parks and Gardens, and Listed Buildings, is also a consideration in the planning process.	Noted
	Other elements that are likely to impact (both adversely and beneficially) on the archaeological resource are: agricultural & forestry works (turf growing for sale, ploughing, drainage, creation of caravan & camping sites with services and hardstanding, planting & felling); public access arrangements such as footpaths and open country (information boards, erosion – including cycling/vehicular off-roading, vandalism and theft) can change the numbers visiting archaeologically sensitive sites. Historic mineral extraction sites are now recorded on the HER; and potential issues surrounding coal bed methane and gasification may impact on some of these or other historic assets. Some utilities work in Gower has required archaeological mitigation – Cefn Bryn undergrounding, recently – and the impact of cabling, poles and masts is considered. Climate change may also have an effect regarding erosion or damage to peats and dune systems, much of which contain archaeological remains and fragile palaeoenvironmental evidence	2.50 extended to incorporate comments
The Gower Society	2.13 The 20 SSSIs should be described as having ‘biological and geological/geomorphological features’, otherwise the other 6 that have ‘only geo. features’ appear as less important.	Line amended

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	2.17 Ash trees are very important to Gower – the 2006 AONB Management Plan stated that there were 67(?) ash tree sites in the AONB.	Paragraph amended to raise the profile/ significance of ash in the Gower landscape. The 2006 Plan refers to 67 ancient woodland sites – not necessarily ‘ash tree sites’.
	2.23 The SWOL project appears to have had little real impact and waste depositing is continuing.	Noted, but no amendment required to the Plan
	2.29 LANDMAP is an important tool, but only so long as it is kept up-to-date. If this is done, it will be valuable not only to assess but to monitor landscape character.	Noted, but no amendment required to the Plan. NRW have been undertaking a LANDMAP landscape monitoring /update exercise.
	2.30 The AONB Design Guide and the Lighting Guide are important and welcome developments. They will not become effective, however, until they become embedded in the consciousness of the LPA, officers and councillors.	Noted, but no amendment required to the Plan.
	2.33 Photomonitoring is important, but will be wasted unless it is repeated on a regular basis and the results are compared. The same is true of aerial photographs. Little, if any, use appears to have been made of aerial surveys provided by The Gower Society over the last eight years.	Aerial surveys conducted by Gower Society detecting landuse change in a development control context, not to detect landscape change. Agree photomonitoring should be repeat to a consistent and comparable

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		standard; experience in other AONBs suggest every 5 years would be sufficient
	2.36 The Welsh Seascapes assessment is valuable not only in assessing the sensitivity, but also in examining the impact of coastal and near coastal development.	No amendment to the Plan necessary.
	2.48 Cadw's Conservation Principles are worthy, as is their encouragement of local authorities. They will be in vain, however, if not acted on.	No amendment to the Plan necessary.
	2.51 This is a direct copy of para. 2.23. One of the two should be deleted.	2.51 deleted
	2.53 It is not clear here whether 'local lists' are being noted or recommended for Gower.	Paragraph amended to identify Local Lists may be a way forward for identifying locally important heritage assets –as they have been used in other protected landscapes. Not a recommendation
	2.56 No indicators are given here and no frequency of monitoring, nor how adverse conditions will be mitigated 2.64 See comment above	Monitoring reliant on using existing reporting/ monitoring systems. To be taken forward with Historic Environment partners. No amendment to the Plan necessary.
	2.68 How does the LA intend to encourage sympathetic management of parks and gardens? It may already be too late at Stouthall.	There are other partners with a role to encourage

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		<p>sympathetic management of parks and gardens. The AONB Partnership - through a Sustainable Development Fund grant – has supported Carreg Adventures at Stouthall, including the intention to “restore much of the grounds of the former estate to better reflect their listing in the Register of Landscapes, Parks and Gardens.”</p> <p>No amendment to the Plan necessary.</p>
	<p>2.71 Why, in the period 2006 – 2014 has no information [...on condition of Registered Parks and Gardens] been gathered?</p>	<p>No information has been gathered because there is no requirement/ mechanism to do so. No amendment to the Plan necessary.</p>
	<p>2.80 If Conservation Areas in the AONB are ‘unlikely to be reviewed for a number of years’, the LPA will be working on statements some fifty years out of date.</p>	<p>Resources and need/priority for Conservation Area appraisals/ management plans to be taken forward under Actions for Objective</p>

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		9. No amendments to the Plan necessary.
	2.84 What is the LA intending to do about this?	See above. No amendments to the Plan necessary.
	2.96 An increase of one river out of fourteen to achieve good ecological status by 2027 seems an unacceptably low target.	The Table identifies that <u>all</u> 14 River Waterbodies are required to achieve 'Good' status – 7 by 2015 and 7 by 2027. No amendments to the Plan necessary.
	2.110 Remove 'a' between 'also' and 'relevant'	Line amended
	2.111 How does the LA intend to assess these trends and their effects?	Unless significant issues become apparent, LA has no intention to assess these trends No amendments to the Plan necessary.
	2.113 – 2.124 The Lighting Guide is an important first step, but it needs to be strictly implemented. Private infringements, security lights etc are a continuing problem but para 2.122 seems excessively complacent. Caravan sites are becoming more residential and more lit up.	Noted, but no amendments to the Plan considered necessary.
	2.150 The licence to dredge Helwick Bank was renounced by LSDL in exchange for changed permissions on the Nobel Bank. No future licence for this area should be issued. Beach levels should continue to be monitored.	Noted; beaches levels/profiles are monitored through the Shoreline Management Plan. No amendments to the Plan

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		considered necessary.
	Chapter 3 Activities and Pressures	
GGAT	3.62 Onwards – development. This is monitored by GGAT Archaeological Planning as the Archaeological Advisors to City & County of Swansea.	Noted
	Vision Statements: 4: Cultural Heritage (particularly policies CH1 and CH2 and Objectives 8 & 9): We support this Statement, and others where the archaeological resource, including Landscape, is linked (Objectives 38). The “Theme and Vision” on p104: HER should read Historic Environment Record.	Support welcomed and reference on p.104 amended.
Natural Resources Wales	3.1 We note that the activities and pressures reflect the social and economic aspects of the AONB, however there appears to be little information on the actual population demographics of Gower and how this may inform trend analysis.	Para added on
	Agriculture 3.7 Need to indicate the date to which the Glastir update figures apply. It will be useful to get a figure close to final date for publishing the Plan, including Glastir Commons It may be helpful to give a little more background on the Gower Commons Initiative, its partners and running dates (also for “Life in Common”) and to reference how the issues are carried forward in current Plan. 3.9 Should this include a reference to the EIA (Agriculture) Regulations? 3.16 Millwood also includes mixed woodland 3.18 European biodiversity importance (Special Areas of Conservation)	3.7Year added (2013). No Glastir commons on Gower as of this date. 3.9 Regulations now referenced 3.16 and 3.18 altered
	Tourism Suggest Tourism (3.27) be renamed Tourism and Recreation, as the two are closely linked, especially in terms of impacts and opportunities. The Plan could be clearer on whether it is just the tourism-related or other recreation that are pressures. CCS may wish in future to consider applying for the European Charter for Sustainable Tourism a benchmark that some other protected landscapes have achieved.	Title amended, but considered is clear that both tourism and recreational pressures are adequately referenced European Charter status is

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		still a consideration, but needs to be considered as part of the wider context, particularly the DMP.
	<p>Climate Change Para 3.55 We welcome the commitment to completing a vulnerability assessment for the special qualities of the AONB. Please refer to detailed comments for Chapter 4 below</p>	Noted. See response to detailed comments below
	<p>Development Should this section include Renewable energy development generally, update/ guidance e.g. small scale renewable energy proposals such as solar</p>	AONB Partnership to finalise renewable energy policy advice to LPA
Swansea Bay Sustainable Travel & Tourism Partnership (Baytrans)	<p>3.32 The principle of developing Sustainable Tourism is very much endorsed and the encouragement of walking holidays/days out needs to be more actively encouraged. Public transport has the particular advantage of reducing the impact of traffic pollution, congestion, shortage of parking spaces but more positively, makes linear (particularly) coastal walks easier and can deliver visitors staying in Swansea (where the majority of accommodation is) benefits of easy access to Gower without their cars. Cycling is more difficult to promote as there are few 'safe' roads in Gower and even fewer alternatives other than the incomplete north Gower cycle route.</p>	Additional text added to 3.32
	<p>3.34 Whilst endorsing the policy of not widening or improving Gower roads in general, I must point out the fairly regular difficulties experienced mainly around Parkmill and Kilvrough when buses interact with cars/caravans, motor homes, freight vehicles and coaches causing severe delays. The introduction of traffic control on a part time basis would help solve this without detriment to the environment.</p>	Additional text added in 3.35 to note this issue. Potential solutions under consideration by Highways
	<p>3.36 The Gower Explorer bus network continues to serve the peninsula comprehensively with recent economies at the margins (mainly evenings). The continuing reductions in public funding for buses represent a future threat to this fine network and a positive plan to protect, grow and further improve this is essential.</p>	Additional text added in 3.36 to note this issue. AONB Team to discuss

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	<p>Sunday services have been provided with RDP funding for the past four years following earlier bus funding cutbacks and there is currently no future plan for their continuance. Again, this needs to be addressed in an overall development plan.</p> <p>Bus stop infrastructure is often sub-standard, visually intrusive and impacts on the visitor environment (similar to car park comments below). Investments to get an AONB minimum standard as applies in some National Parks is needed.</p>	<p>with Baytrans the issue of minimum standard for bus stop infrastructure</p>
	<p>3.37 & 3.40 Thanks for the reference to the work BayTrans continues to do in promoting public transport for outdoor recreation.</p>	<p>Noted. No amendments required to the plan</p>
	<p>3.38 Whilst the 1990's recommendations have been implemented in regard to public transport, note as above that there is a constant threat to its continuance at a viable level and the issue needs revisiting with a new development plan.</p>	<p>Additional text added in 3.38 to note this issue</p>
	<p>3.39 The visual appearance and upkeep of car parks is generally very sub-standard in Gower. They disfigure the environment and impact poorly on the visitor experience.</p>	<p>Noted already in 3.39 and to be looked at in the Action Plan (Objective 27)</p>
	<p>3.42 Some linkage between Gower's fine ROW network, bus routes and bus stop infrastructure would be helpful to reinforce the development of sustainable tourism based on walking.</p>	<p>Agreed, additional text added in 3.43 to highlight these issues</p>
	<p>3.43 The Coast Path is a fine initiative which appears to be attracting more visitors. There are some issues over signing which I've noticed and drawn attention to particularly for walkers arriving by bus. Signage from key bus stops would be an advantage.</p>	<p>Noted</p>
	<p>3.44 The linkage between train and bus at Gowerton is very sub-standard and some appropriate signage would be helpful.</p>	<p>Noted and comments forwarded on. No amendments required to the plan</p>
	<p>3.47 The number of mobile 'black spots' on Gower is a cause of concern to public transport users in the event of delays or cancellations to bus services when it becomes difficult to phone for information or help. Improvements in coverage are urgently</p>	<p>Agreed, additional text added in 3.48 to highlight these issues</p>

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	<p>needed.</p> <p>The general thrust is fine but I note that the support given in 2006 was followed shortly after by cutbacks in public transport provision. You should include a policy that commits to protecting a seven day a week comprehensive public transport coverage in Gower.</p> <p>It is noted in the policies on communications is that they have been substantially beefed-up since 2006. A similar approach should be taken with transport. Similar comments apply through to the Action Plan. Finally, to confirm that BayTrans will continue its programme of support for the development of public transport in Gower in future years</p>	<p>Difficult to commit given ongoing finance situation. AONB can support/ highlight the value of continuing a seven day service</p> <p>Noted. No amendments required to the plan</p>
The Gower Society	<p>LDP Draft that shows additional housing on Gower.</p> <p>I am rather concerned about the housing that has been shown and the rather short sighted assumption that this is going to be taken up by locals rather than importing more people from Swansea. Whilst this is a most laudable aim I have to pose the question as to where all of these people are going to work? If houses are to be constructed to serve individual needs then I can accept this but if we are going to encourage more and more people to travel into Swansea then it can not be right. I will not tackle the arguments made in the Partnership Meetings but rented housing is the only way of keeping houses in the market for young people ie social housing. The additional housing at Scurlage, Port Eynon, Bury Green will impact upon the sewerage system and treatment that is already overloaded. Water supply is also not that guaranteed and I write as an ex Welsh Water Area Manager. Possibly more could be added on these aspects?</p> <p>Utilities and Communications</p> <p>We have tackled the removal of overhead cables in key landscape locations and we should continue with this. We know that the mobile phone system is not brilliant on</p>	<p>Comments passed on to LDP consultation for consideration.</p> <p>Issues re. sewerage have also been highlighted by NRW response (Annex B). Amendments/additions included under Water Quality section.</p> <p>Agreed and retained in Action Plan under</p>

CONTACT	COMMENT	RESPONSE
	<p>Gower. Additional masts are talked of in the press today and we must try to ensure that these are not 'plonked' in key landscape locations. We should even consider the false tree approach for certain masts.</p>	<p>Objective 30. Objective 29 and relevant actions address this issue</p>
	<p>Future Energy Requirements (not certain where you put this but I will plough on below) Future overhead cables are covered above. We now consider the various alternative energy and 'renewable' schemes that are now a big issue. We have the special Sub Committee recommendations that will eventually hit your desk but I list the following :</p> <p>wind generation - Apart from small single house schemes that are low level, unobtrusive, low noise I think that they should not be allowed within the AONB. Larger schemes outside the AONB and in off shore locations can have a detrimental effect upon the landscape. Those that damage the AONB should be opposed.</p> <p>Solar panels - Individual roof schemes should be allowed (although I think that listed buildings and conservation areas should be regulated). Larger schemes for farm buildings should be generally encouraged as long as each is assessed for the visual impact on the landscape. Individual small ground mounted domestic schemes should be encouraged as long as they are not impacting upon the landscape. Large commercial schemes should not be allowed within the AONB and schemes that impact upon the landscape outside the AONB should be assessed on an individual basis.</p> <p>There are two different types of panel. Completely black and very unobtrusive as well as others that have aluminium self coloured frames and elements that are certainly more obtrusive. IN MY OPINION WE HAVE MISSED A CHANCE TO SPECIFY THE DARKER COLOURED ONES FOR THE AONB. Tidal lagoons, barrages and tidal flow -To be considered as and when they are proposed.</p>	<p>Renewable energy advice is being finalised by the AONB Partnership</p>
	<p>3.23-3.24 Public digging of shellfish (e.g. at Oxwich Bay) could deplete natural populations. This appears to be neither monitored nor controlled.</p>	<p>AONB team to discuss with NRW and CCS Nature Conservation Team – No amendments to the</p>

CONTACT	COMMENT	RESPONSE
		Plan considered necessary at this time
	3.5 Pick Your Own has reduced over recent years	Line amended
	3.8 Solar panel farming will, if allowed, have a greater negative impact on the landscape than a modest amount of plastic sheeting.	Noted, but solar energy issues dealt with in Development Section. No amendments to the Plan considered necessary.
	3.16 – 3.22 An additional pressure on woodland is the increasing popularity of wood as a household fuel.	Noted, but no information that this is having any significant effect. No amendments to the Plan considered necessary.
	3.24 There may be opportunity for increased fishing activity.(Gordon's 3.26 seems to be covered now in 3.26.)	Noted, but no amendments to the Plan considered necessary.
	3.28 A not insignificant proportion of the bedstock is taken up by local people, as 'second homes' / 'weekend caravans' rather than by tourists from out of the area.	Paragraph amended to register this point
	3.30 The negative visual impact of static caravan sites could be mitigated by the simple expedient of introducing supplementary Planning Guidance requiring static caravans to be finished in a recessive colour. Landscaping could also be effective.	Noted, although this detail needs to be considered in the context of the actions for achieving Objective 33. No amendments to the Plan considered necessary
	3.38 (line 6) replace '1990's' with '1990s'	Line amended
	3.39 Many car parks are a very poor advert for Gower or quality tourism.	Noted, but no amendments to the Plan considered necessary.

CONTACT	COMMENT	RESPONSE
	3.63 The AONB Design Guide is welcome, but it is imperative that it be implemented more strictly and more consistently than at present.	Issue for LPA implementation rather than for the Plan.
	3.64 Position, materials and colour can strongly affect the impact on the landscape of agricultural buildings and the LPA must use the Design Guide principles to ensure that negative impact is kept to a minimum. The LPA must ensure that a proposed building is necessary and that, once built, it is used for the approved purpose.	Issue for LPA implementation rather than for the Plan.
	3.68 Where 'affordable housing' is to be permitted, a watertight scheme must be in place to ensure that it remains 'affordable' and does not enter the general housing market.	Issue for LPA implementation rather than for the Plan.
Chapter 4 The Vision and Chapter 5 The Strategy		
The National Trust	Objective 20 of the Draft plan does not recognise the importance of National Trust Rhossili beach and should be modified to acknowledge the importance of this site and the National Trust in the implementation of the Objectives. The overarching role of Rhossili and the South Gower Coast and the National Trust responsibilities at this site could form a useful addition to the text within Objective 20.	Discuss with NT re. Rhossili. Amend 2.114 to make specific ref to Rhossili. National Trust added as lead partner to Action Plan for Objective 20
	The Trust also has a fundamental role in the implementation of Objectives 18 and 19 and support is given for greater communication of recreational opportunities within the draft plan.	Action Plan for Objectives 18&19 amended to include the Trust.
	Sustainable Land Management remains a fundamental management aim of the National Trust land holding on Gower. The Trust seeks to work in partnership as part of its management of the AONB and this could be reflected in Objective 21(3) in terms of collaborative land management opportunities.	Action 21(3) amended to broaden scope and include more partners including National Trust

CONTACT	COMMENT	RESPONSE
	<p>Objectives 25 through to 28 are supported, however, the practical implications and financial requirements should not undermine the implementation of the Plan objectives. The draft plan could recognise the value of coordinated Travel Planning for sites within the AONB and the role of the Management Plan in bringing together partners for a coordinated approach. The value of Travel Planning could be an important element in any SPG. The Trust is supportive to Travel Planning but recognises the fundamental role of resourcing public transport requirements and specifically resourcing Actions to achieve Objective 26(2). The Trust recognises the central role of the National Trust Rhossili site and would be pleased to support Actions to implement the requirements of Objective 27 as a specified Lead Partner.</p> <p>Overarching support is given for the need for coordinated AONB communications and the need to resource such communications. This is a vital area given the current Welsh Government policy review of designated landscapes and support is given to Objectives 37, 38 and 39. Perhaps climate change could be added as a further specified aspect within Objective 38.</p> <p>Support is provided for the AONB Communications Plan and the engagement of partners in the implementation of the Communications Plan. This plan period will be a key period for communications given the external climate and potential impacts of climate change within this plan period.</p>	<p>Noted and National Trust added as a lead partner to Objective 27</p> <p>Support noted and welcome. Specified aspects in Objective 38 relate to the special qualities of the AONB so not considered appropriate to add climate change at this point. However, climate change must be a key aspect of engaging with the public in the achievement of objective 38 and 39</p>
Natural Resources Wales	<p>We note the explanation provided in the consultation draft, including the Annex 2 report on progress with objectives and actions from the 2006 Plan.</p> <p><u>Theme 1 Biodiversity</u> <i>The objectives don't appear to mention the update to fully integrate and take account of the review of Swansea LBAP as per annex 2 "Comments and objectives/actions to carry forward" column?</i></p> <p><u>Theme 4 Cultural Heritage</u> Could also consider historic assets (non- scheduled), in recognition of locally important</p>	<p>Most of these points are addressed through the Action Plan.</p> <p>5.17 has been amended to include built heritage</p>

CONTACT	COMMENT	RESPONSE
	<p>heritage Para 5.17 Could specify character of Built heritage as this would support landscape theme The theme includes Landscapes Parks and Gardens – suggest add policy to cover this and also an objective for the Register of Historic Landscapes parks and Gardens or include in existing objectives We note some of the above may be covered later in the Plan</p>	
	<p><u>Theme 5 Natural Resources</u></p> <p>Objective 12 - we note the action to review soil and land quality data across the AONB We would suggest a reference to The Agricultural Land Classification (ALC) and the fact that Wales's data is held by Welsh Government - contact: Ian Rugg, Natural Resources - Land, Nature and Forestry Division - Ian.Rugg@Wales.GSI.Gov.UK.</p> <p>The ALC England & Wales map can be found at: http://publications.naturalengland.org.uk/publication/6172638548328448?category=5954148537204736 For further sources of information we would suggest you may wish to contact our Soils and Land use advisor Dylan.L.Williams@cyfoethnaturiolcymru.gov.uk.</p> <p>The UK Soil Observatory (UKSO) is also a valuable source of soils information. http://www.ukso.org/home.html</p> <p>Potential monitoring and indicators eg Soil sealing/land take considerations - resulting in loss of soil multi functionality and its ability to provide ecosystem services.</p>	<p>Details and contacts noted and to be taken forward as part of action.</p>

CONTACT	COMMENT	RESPONSE
	<p><u>Theme 6 Tranquillity</u> Objective 14 whilst the proposal is welcomed to “Develop and undertake baseline/monitoring approaches for tranquillity/dark sky” is welcomed this would be something we would view CCS leading on as we don’t have a joint project at the current time. The BBNP have done some work on this and may be useful advisors</p>	<p>Noted, although it would be helpful to have a standard approach to this across protected landscapes in Wales</p>
<p>The Gower Society</p>	<p>4.2 While the current Vision does not ‘give sufficient recognition’ to climate change, it is complacent to suggest, by implication, that nothing needs to be done for the next five years. There are increasing pressures for windfarms, solar farms, fracking etc to mitigate any possible climate change effects. There needs to be a vision or a policy to deal with these increasing pressures.</p> <p>How many of the policies and objectives identified have been realised in the first eight years (i.e. 40%) of the 20-year vision? How many of the management issues highlighted in the objectives have been a) identified; b) addressed in the last eight years?</p>	<p>The Plan is not suggesting nothing needs to be done in the next five years. There are a series of policies, objectives and actions over the current plan period to give a more informed consideration of climate change in the next plan review. The pressures identified are development pressures identified and considered elsewhere in the Plan. No amendments proposed to the Plan.</p> <p>Page 68 and Annex 2 of the draft Plan presented an analysis of completed objectives/actions from the 2006 Plan, which informed the development of the</p>

CONTACT	COMMENT	RESPONSE
		draft Plan. No amendments proposed to the Plan.
	5.12 Visual surveys of distinctive landscape features are essential if change is to be monitored. Why has the current LS3 been omitted from the new Plan?	The Review considered LS3 to be an action rather than a policy. LS3 will taken forward as part of LS2 and Objective 7. No amendments proposed to the Plan.
	5.34 The Gower Way should be treated in the same way as the Coast Path.	Plan amended to include the Gower Way
	5.45 Add: 'Signage for tourism facilities should be appropriate to its situation in an AONB.'	Not a policy. No amended proposed.
	5.52 Better car parking provision is important as well as the understanding of the provision.	Line amended
	5.53 Highway improvements should also consider the appropriateness of signage in the AONB.	Agreed and already covered in the Highways Good Practice Guide. No amendments proposed to the Plan.
	Chapter 6 The Action Plan	
Wildlife Trust of South and West Wales	Just to let you know I have read through the draft document and have no comments to make really. A very minor one might be that it would be nice to see WTSWW listed as a partner for objective 38!	WTSWW added as lead partner as requested
The Gower Society	Chapter 6 There is a lot of emphasis throughout many sections of the Action Plan on evaluating, reviewing, reporting, providing evidence bases, consulting, assessing, updating, prioritising, mapping and monitoring – but much less emphasis on practical	Looking forward to working with Gower Society and rest of AONB Partnership

CONTACT	COMMENT	RESPONSE
	action to achieve the objectives. Continual review is important, but nearly half-way through the 20-year plan, more action should be taking place. ...	in implementing practical actions
	Chapter 7: Monitoring	
The Gower Society	Chapter 7 Monitoring is essential, yet, after eight years, important areas such as Tourism (Theme 9) appears to have no indicators and no performance measures. No methodology is given for monitoring sometimes complex outcomes. A number of the objectives under other themes are similarly undeveloped.	Monitoring/performance measures often dependent on using information already been collected elsewhere. There is an opportunity to develop these in the current Plan period.
	Annual reports to the AONB Partnership are promised, but it would be very useful to summarise how many of the objectives of the 2006 Plan have been fully or partly achieved; and where they have not, why they have not been achieved and what is to be done about it. Indeed, this should have been the starting point for this second Plan	Page 68 and Annex 2 of the draft Plan present an analysis of completed objectives/actions from the 2006 Plan, which has informed the development of the draft Plan. No amendments proposed to the Plan.
	In the end, the success or failure of the AONB Management depends not just on fine words, but on ACTIONS. The Plan shows that the heart and mind are in the right place, but the pig isn't fattened by measuring it.	We will work with Gower Society and rest of AONB Partnership to implement practical actions
	We recognise the financial restrictions, but there are some important changes that can be made free of any cost - e.g. strictly adhering to the Design Code and introducing a colour scheme for static caravans – that will go a long way towards protecting and enhancing the AONB.	Noted, but no amendments proposed to the Plan.

CONTACT	COMMENT	RESPONSE
	GENERAL COMMENTS/RESPONSES	
Mr J Matthews	<p>Glad to be included in this consultation. However I feel a lot of this is pointless. I did copy you in on our issue with a beautiful wildlife corridor in Llanmorlais. According to AONB management and all the policies and circulars that are out there to conserve and protect the environment, if someone sees fit to do major clearance there is nothing to prevent this. Development yes, possibly, but clearance work removing habitat and trees , no. Mark winder sent me an overview of Sinc sites in the area, even a large are of this has had clearance work. There is nothing to protect it and nothing I can see that can prevent clearance work in the future. Very frustrating.</p>	<p>A site specific issue that has been investigated by officers and no further action required. No amendments proposed to the plan</p>
Mr P Wales	<p>Gower has turned into a bit of a museum rather than a vibrant and living landscape which I'm sure is not what the plan hopes to achieve. I have always been interested in housing issues so my comments are primarily in regard to diversity of income and availability of affordable homes; property prices in the Gower Coastal area are very high, effectively excluding poorer people and its particularly difficult for young people who may be forced to leave and commute back to work. So with this in mind look at designating land for socially owned homes in all areas of the Gower.</p>	<p>Affordable/Social housing identified as in issue in the Plan. Objective 35 of the plan seeks to ensure that LDP policy addresses affordable housing needs of local communities. Comment forwarded on to the LDP team.No amendments proposed to the plan.</p>
Mr David Atwell	<p>Thank you very much for the opportunity to read the 137 pages of the above document which I found comprehensive and most interesting. I was encouraged to believe that the AONB would continue to be well managed. The presence of the document and reference to it provide an informed framework for the LDP. With best wishes to you as you take this all forward.</p>	<p>Noted and welcomed. No amendments proposed to the plan</p>
Dr D Bembo	<p>Regretfully, I believe that responding to your 'Public Consultation' would be a complete waste of time and energy as I have no confidence that the Council actually gives a</p>	<p>A site specific issue relating to the grant of</p>

CONTACT	COMMENT	RESPONSE
	<p>monkey's what its Council Tax payers think.</p> <p>I and a large number of other local residents have recently voiced significant concerns over a residential development in Bishopston (White Knight Gardens). I subsequently received zero feedback from the Council. It also came to light that numerous meetings had taken place between Council staff and representatives of the property developers in question.</p> <p>More recently, I have seen the diggers move in and start work on that site, causing irreversible damage to the community. This demonstrates a complete disregard for local perspectives.</p>	<p>planning permission.</p> <p>No amendments proposed to the plan</p>
<p>Mike Harvey Crime Prevention Design Advisor South Wales Police</p>	<p>In relation to the above, the only comment I have to make is that no reference is made to the Supplementary Planning Guidance on Community Safety. I would ask that consideration be given for this document to be referenced.</p>	<p>Document now referenced in 3.63</p>
<p>Mr John Cooper</p>	<p>The only comment I have regarding the new plan is; how can CCS override AONB policies with development proposals? In particular the outline PP granted for the hotel/flats inside the AONB which includes the headland behind Mumble pier and now a proposal to be included in the LDP for development to be allowed inside the AONB on the fields above the cliff at Thistleboon. It seems that the Mumbles end of Gower is overlooked but I see it as important as any development allowed at this end not only nibbles away at the AONB but also sets a precedent that can be used as a lever in other areas.</p>	<p>Developmetn is controlled through LDP policies. The AONB Management Plan does not over-ride the LDP, but is expected to give a clear indication of how LDP policy should address development issues in the AONB (1.20)</p>

CONTACT	COMMENT	RESPONSE
MR A R Jones Private individual	As somebody who has an interest in Gower, I am concerned with the number of diseases in trees in Wales and you might like to consider in the plan, options that could be employed to help combat the spread of disease and the planting of trees and shrubs which are resistant that would maintain tree cover on the peninsula . This is important visually and also for habitat for many species. Hope this comment could be useful when in discussion with your partners.	Ash Die-Back disease and other biosecurity referenced in 3.21 and 2.18. AONB Team to review current policy and implications for Gower.
Professor Jim Atkinson Pennard	<p>SUMMARY</p> <p>The CCS is to be congratulated on producing a comprehensive revised Management Plan. A key concept coming through the document is sustainability and to achieve this across all headings will be a difficult balance between conflicting interests. My detailed comments address some of these issues, particularly those relating to tourism, environment, rural development and infrastructure.</p> <p>1. It is encouraging to see such a comprehensive document and the way in which it has been systematically revised since the previous 2006 Management Plan</p> <p>2. Conservation and enhancement of landscape and conservation and enhancement of biodiversity, protected habitats and species are key concepts and are also legal requirements under both national and European legislation. Achieving these goals will be the challenge of the Management Plan which commendably itemises threats to quality of life, environment and landscape.</p> <p>3. A key concept coming through the document is sustainability and to achieve this across all headings will be an often difficult balance between conflicting interests. Some of these are commented on below.</p>	Welcome these supportive statements. No action required
	<p>4. The outstanding scenic and beach attractions of the AONB attract a large number of visitors (over 4 million visit the CCS's jurisdiction with many exploring the AONB) with a high proportion of these citing coast, scenery, natural beauty and tranquillity as the main attractors. Visitors are good for the local economy and have enabled local enterprises to diversify to meet visitor needs. However, it is noted that</p>	Largely supportive statement. Agree that there are issues from large numbers of visitors in the most popular areas.

CONTACT	COMMENT	RESPONSE
	<p>visitor impact was viewed as the greatest threat to Gower in the 2001 Impact Survey: the draft AONB document as well as personal observations suggests that this is still the case. Visitor impact is mainly concentrated on the tourist beaches where there are good facilities for parking vehicles near to beaches sometimes combined with large caravan or camping sites, and often with nearby access to toilets, shops, cafes and other facilities. Other areas that require a bit of effort to reach are much less impacted and are havens for wildlife. These areas are appreciated by those taking advantage of the coastal path or who are prepared to walk some distance from the nearest car park or bus stop. The excellent network of footpaths across Gower appear to be used increasingly and give access to the less explored inner parts of the AONB. Careful management is required to promote the natural environment while minimising visitor impacts. Greater use of on-site visitor centres or on-site information boards could help here. Regrettably, many visitors still leave their rubbish on the beach, some of which have no bins available (e.g. Rhossili). Some thought should go into remedying this.</p>	<p>Intention is that plan actions will consider responses to manage these e.g. actions for Objective 20 – Preparation and implementation of beach management plans.</p>
	<p>5. There are few regions where so many National Nature Reserves, SACs, SSSIs, SPAs, SINCS and other areas of wildlife or geological significance are concentrated in so small an area as that covered by the Gower AONB. The avifauna and maritime flora are particularly rich, as is the marine biota. Many rare species occur, very rare in the case of some of the flora. The plants support a rich invertebrate fauna including many butterflies, moths, and bee species, essential agents of pollination. It is well established that the key to conserving species is conserving habitat. The grazed commons, extensive dune systems, small to medium farms with largely traditional agricultural practices, uplands, grasslands, woodlands and wetlands that form a mosaic of habitats within Gower are essential to its ecological richness. Management of some of these areas is the direct responsibility of the CCS, others are devolved to other bodies. The challenge within the AONB is a joined-up approach which encourages access but manages it to reduce ecological disturbance. People</p>	<p>Agree with all of these statements</p>

CONTACT	COMMENT	RESPONSE
	<p>need to experience wild places in order to appreciate them and the latter is helped if information on the significance of various sites and their fauna and flora is available to visitors. There is some information already available but more could be done in this area and the AONB Management Plan could help here. The Swansea Local Biodiversity Action Plan and Countryside Action Plan are useful springboards. Ecotourism is an expanding industry worldwide: some already occurs within the AONB and there is potential for expansion provided it is done by suitably trained personnel.</p>	
	<p>6. Rural areas often suffer from depopulation in favour of towns and cities – a national trend. Properties in much of Gower are expensive and not conducive to encouraging young working families to settle there. The LDP is therefore correct in concentrating on areas where affordable housing can be provided, which will enhance local communities. The CCS Unitary Development Plan (UDP) Local Development Plan (LDP) are informed by the needs of the AONB, this providing supplementary planning guidance. Of the LDP it is stated that “the protection of the natural beauty of the AONB will however remain the primary policy consideration in the main AONB plan”. It further states that “LDP is a critical aspect in the maintenance of the AONB’s special qualities in that it is through the LDP that development is controlled.” It is therefore encouraging to see that the stated principles for access to infrastructure facilities, affordability and environmental sensitivity appear to have been applied in the selection of sites under the emerging LDP, and that sites that do not meet these criteria have been rejected. It remains necessary to deal with any housing or commercial developments within the AONB with great care, especially those adjacent to the heritage coast and its adjacent maritime and near-coastal habitat. The impact here is not only on ecology, but on aesthetics. The Gower coast is the jewel in its crown. Areas of it are already overdeveloped or developed insensitively, out of keeping with the surrounding architecture. It is encouraging to see the AONB indicates that thought should also be given to the landscape when viewed from the sea. Thankfully, most of Gower is not overdeveloped. It should not aspire to be what it is not but should</p>	<p>Agree with all of these statements</p>

CONTACT	COMMENT	RESPONSE
	capitalise on what it is and strive to maintain its largely unspoiled character. People who want something else have plenty of choice elsewhere. Insensitive development brings noise pollution, light pollution and landscape and ecological degradation.	
	7. At a time of political austerity, it is a challenge for the CCS to maintain services and infrastructure support to rural communities. However, the maintenance of such services is essential to the sustainability of these communities. Without them tourism aspirations, encouragement of new working settlers, the continued existence of local shops, and the long-term future of rural communities are all compromised.	Agree with all of these statements
	8. The CCS is to be congratulated on producing a comprehensive Management Plan for the Gower Area of Outstanding Natural Beauty. The 'proof of the pudding' will be in its 'eating' – the implementation of the plan. Gower has a rich cultural heritage. It also has a remarkable landscape and coastline, rich in biodiversity and with large areas which are substantially unspoiled by human impact. It would be a tragedy if future historians and ecologists reported on the loss of that heritage and the demise of the pristine nature of much of the peninsula.	Agree with all of these statements
Prof. Dennis Bellamy CMS Consortium	<p>As Chairman of the CMS Consortium I am writing to you regarding the request for feedback on the 2014 Draft Gower AONB Management Plan. The Consortium is a not for profit group of UK GOs and NGOs that came together in the late 1980s to develop a management system (CMS) for nature conservation. The CMS was originally envisaged as a tool to help create habitat and species management plans. In this context it is a database/GIS tool which enables central reporting on performance indicators from operational plans.</p> <p>We now wish to develop a CMS to serve the wider purpose of tracking multi-themed outcomes. This appears to be the direction you are taking with the Gower plan and I wonder if your management team has considered the need for an overarching CMS type planning/recording logic to track performance indicators through all of your lead partners and CCS teams.</p> <p>The driver for developing the CMS has consistently been the demands for a seamless</p>	AONB Team to discuss with CMS consortium. No amendments to Plan required

CONTACT	COMMENT	RESPONSE
	<p>recording/monitoring system for linking the strategic level with the operational level. Our basic planning logic is that the objective for each important feature to be managed is tagged with measurable performance indicators so that outcomes of the plan can be monitored. Each objective is then assigned a schedule of resources, such as jobs, methods and finance, to control factors standing in the way of reaching the objective. Such a project-based management system can be accommodated on a single sheet of paper/spreadsheet or entered into a combined online computer database/GIS system for ease of centralised reporting and spreading ideas and achievements. In the latter context we are developing interactive training/education modules for promoting the topic of environmental management, one of which is based on the cross-curricular topic of 'managing natural beauty'.</p> <p>Through the agency of the Consortium, the above planning recording logic is currently being used at various levels of thematic complexity throughout the UK and into Europe. On the Gower, our CMS is currently being used by NRW (an online computer database) and the National Trust (a paper system). Therefore, it should be relatively easy for these two organisations to provide you with nature conservation performance indicators. I see the important question as: 'Could a CMS be developed that includes all the organisations which your 2014 plan is asking to report on their operational outcomes?'</p> <p>Would you be interested in discussing this question with the Consortium with a view co-producing a suitable data model for joint evaluation? There would be no monetary costs to the AONB team.</p>	
Sara Holden Managing Artist Sculpture by the Sea	I'm writing to say that I have reviewed the proposed AONB management plan of Gower and wish to comment that we agree with the conservation aspects and objectives that have been set out. However, as an arts organisation that has worked extensively on Gower AONB, CCS and CCW educational environmental art projects with local schools that have inspired and educated children and young people about the area, we would welcome emphasis being put on its aesthetic qualities too. Beautiful landscapes and	Aesthetic qualities considered to be satisfactorily addressed in Theme 14 – Awareness Raising and Understanding and actions under

CONTACT	COMMENT	RESPONSE
UK	<p>seascapes have always been recorded by artists and poets whose art has helped to highlight, show and persuade others of the cultural importance of keeping special places natural and undeveloped. Item PI2 of the plan sets out to support environmentally sustainable craft and workshop activities so we would hope that this would include the services of groups like ourselves who are trained artists and have for many years run environmental art programmes that couple nature and art. In line with Objective 38 to increase public access to, appreciation of and involvement with all the special qualities of the AONB, we would welcome the opportunity to be involved in helping to deliver the Gower Cultural Heritage programme such as intellectual access, walks, talks and events projects that help enhance people's environmental awareness, cultural appreciation and knowledge.</p> <p>Thank you for all your help and support in running our past Gower Nature and Art projects and we hope to work again with the AONB in the future. Please feel free to show others involved in the consultation the photo and text features on our website (www.sculpturebythesea.co.uk) of projects that we have successfully run on Gower such as our annual sculpture festival on the beaches and projects in nature reserves such as Bishops Wood (i.e. Every child Outside Sculpture Trail Project) in partnership with AONB and City and County of Swansea.</p> <p>I would like also to draw your attention that the title/words AREA OF OUTSTANDING NATURAL BEAUTY actually refer to the aesthetic - beautiful and artistic aspects of the place (rather than any scientific aspects) so we would hope to see the final plan give at least 50% priority to these qualities and fund these aspects equally with the more scientific side of its management - i.e. fund projects that help others understand, feel sense of place and be part of the cultural heritage of the place, in line with tranquil activities. Also that Education about the place is an important part of the conservation and sustainability of the place.</p> <p>I know that you will give consideration to these things that I have highlighted.</p>	<p>Objective 38 – e.g. develop and implement a programme of intellectual access, walks, talks and events projects.</p> <p>‘Natural Beauty’ is a term that has a specific interpretation for AONBs and National Parks. CCW prepared a statement on natural beauty available here:</p> <p>http://www.ccg.gov.uk/landscape--wildlife/protecting-our-landscape/special-landscapes--sites/protected-landscapes-and-sites/aonbs/clwydian-range-and-dee-valley/technical-reports.aspx</p> <p>This statement encompasses a wider definition than just the aesthetic qualities of the landscape.</p>

CONTACT	COMMENT	RESPONSE
Phil Holden Photo- graphy	Great Management plan. When it comes to sustainable tourism obj.24 , my main consideration must be whether photo libraries in the area may lose out from the availability of photos from other sources at prices that are less than industry standards. I was surprised to see that you are using photos by [name withheld] someone I went to school with in Lamphey and a practicing geologist from Pembs. rather than a local photographer such as myself. Please let me know if you are ever in need of photos even for presentation use.	Noted. GLP project has recently commissioned a portfolio of images using a local professional
Mr Paul Griffiths Resident	I would like to discuss the AONB boundary line that comes across Caswell Road from Langland Golf Club and goes half way along my road and shoots of at an angle across the bottom of my garden. It would make much more sense when it crosses Caswell Road that it follows the footpath as opposed to as previously described go half way along a road and the arbitrarily go south and join the footpath	AONB Team met with Mr Griffiths to discuss the boundary issue around his property. No amendments required to the Plan
Gower Power Community Cooperative	<p>On the whole I think the plan is really thorough in terms of addressing the framework it provides. I also can't help but think the plan is missing a trick if it doesn't consider in more detail the flow of resources in and out of the AONB and any potential positive and negative effects of those flows. Without wanting to go into too much detail, my concerns would be addressed by properly embedding the principles of a 'circular economy' within the plan and underpinning the long term vision by those principles. I also think the AONB management plan vision should have "Consumption" as one of its key themes, as supporting residents, business and visitors alike to consume responsibly would go so far to support many of the other themes (1,5, 8 & 9). As you are aware, I have concerns about the "honeypot tourism" that I think most beautiful places inevitably promote to monetise their beauty, but I think even if this temptation is irresistible then we should be doing a better job of it and not opting down the "leaky bucket" approach. My point is illustrated by the following video...</p> <p>https://www.youtube.com/watch?v=cj3Bp13hLiE#t=25</p> <p>I am not suggesting that a Bristol Pound solution is the right one, (it almost definitely isn't), moreover that the AONB management plan should do more to build co-</p>	This AONB Plan revision has focussed on updating objectives and actions. Some principles raised in these comments would be difficult to incorporate into the revision given the statutory requirements and guidance for AONB Management Plans. AONB Partnership will continue to work with GPCC e.g. through the Rural Development Plan and developing the Natural Resource Planning

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	<p>dependencies/ co-operation between producers, tourist operators, transport companies, community facilities, ecologists etc for the sake of protecting the AONB and retaining as much economic resource within the AONB. I don't know I am suggesting this as an additional theme (Co-operation?) or it just relates back to the principles of a circular economy I mentioned.</p> <p>I also have strong views about the importance of creating decentralised energy systems for the sake of building resilience within the AONB, but I think these can wait for the revised plan in 5 years time!!!</p>	<p>approach.</p>
<p>Friends of Swansea Horses</p>	<p>1 Friends of Swansea Horses (F.O.S.H.) was set up to protect the welfare of horses in the Swansea area. Our principle is 'putting horses first'. There are many horses kept within the AONB. These include horses kept on common land as well as private land and in connection with horse businesses. Horses have long had an association with the Gower and, we believe, their care has an important impact on perceptions of the area.</p> <p>2 It is of concern that the management and care of horses on the Gower receives almost no mention at all in the 2014 AONB Draft Management Plan. The reason for this is unclear but perhaps has to do with them falling between various stools. The Plan, for example, addresses 'Agriculture' yet horses as companion animals, kept for grazing or living as semi-feral animals, are not strictly an aspect of agriculture. The Plan also refers to 'Biodiversity' but again kept horses do not ordinarily fall under this heading.</p> <p>3 Nonetheless, the management and care of horses on the Gower is important and bears on a number of objectives of the Plan. There is, unfortunately, much evidence of poor welfare of horses kept. This includes the welfare of non-adapted horses turned out onto marshland (for example, on Llanrhidian Marsh off Penclawdd) which are exposed to extreme conditions of tides, cold and exposure, inadequate care in some instance of horses turned out on other areas of common land, and high rates of vehicle accidents affecting roaming horses. Those horses kept under the auspices of 'pony improvement societies' which are often hardy breeds may nevertheless receive inadequate care.</p>	<p>Horse welfare issues and measures are being taken forward through other mechanisms in the Council and by other partners. No amendments have been made to the Management Plan, but the AONB Partnership has enabled FOSH to present at their meetings.</p>

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	<p>4 The Plan addresses issues on the Gower and objectives over the next 5 years in terms of 14 'themes'. The achievement of objectives against each theme will determine whether or not goals for the management plan in 'conserving and enhancing the natural beauty of the area' (paragraph 1.2) are achieved. Failure to properly consider and address the management and welfare of horses on the Gower represents a threat to certain of these objectives. The welfare of horses as complex, sentient animals is intrinsically important. However, failure to ensure proper care also will affect the reputation of the Gower as a tourist destination (Theme 9) and may significantly detract from raising 'awareness and understanding' of the area (Theme 14). There are likely to be detrimental effects on other areas/themes too (eg recreation, landscape).</p> <p>5 We note that references in the draft plan are limited at the moment to a very brief one in paragraph 3.4 as follows :</p> <p>'Significant tracts of common land, including the North Gower salt marshes, are grazed by cattle and sheep and – to a lesser extent – by ponies.'</p> <p>and in paragraph 3.12 by implication though without referring specifically to horses as follows : '...Pressures from traffic travelling across the common have contributed to increase the risk of car/livestock accidents.' Given the numbers, the welfare issues, the role and place of horses on the Gower this is entirely inadequate.</p> <p>6 We believe failure to address the management and welfare of horses on the Gower potentially directly prejudices the achievement of the following Objectives in the draft plan :</p> <p>Theme 7 : Recreation</p> <p>Objective 18: Ensure that Access Land is available and publicised for its use by communities and visitors</p> <p>By affecting public perception of the attractiveness of accessing land were horses may have a reputation for ill-treatment.</p> <p>Theme 9 : Tourism</p> <p>Objective 24: Support the development of a sustainable tourism industry on Gower.</p> <p>By negatively affecting perceptions of the area in terms of humane and appropriate</p>	

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	<p>treatment of horses kept and seen on the Gower, for example, as part of the tourist experience of tranquillity, beauty, contact with nature and rural life.</p> <p>Theme 14 : Awareness-raising and understanding</p> <p>Objective 37: Raise the profile of the AONB special qualities and its environmental, social and economic value</p> <p>By drawing attention to distressing or disturbing aspects of the way animals are kept and treated at the expense of consideration of other qualities of the AONB.</p> <p>Objective 38: Increase public access to, appreciation of and involvement with all the special qualities of the AONB, but particularly:</p> <ul style="list-style-type: none"> • Biodiversity; • Geology; • Landscape; • Cultural Heritage <p>As above, by drawing attention to distressing or disturbing aspects of the way animals are kept and treated at the expense of consideration of other qualities of the AONB.</p> <p>7 Friends of Swansea Horses wish to propose that the draft Management Plan is amended to include some specific references to ensuring the proper management and attention to welfare of horses kept on the Gower. We are concerned that if such explicit reference is not made then it may make it more difficult to address often long-standing welfare problems of horses over the coming years. We note that the welfare of horses has an increasingly high public profile in Wales.</p> <p>8 We recommend that before the Plan is finalised that in each of the key sections of the report that a relevant statement is included which, in combination, will provide direction to a strategy for protecting and improving horse welfare across the Gower. We recognise that role of horses on the Gower and their management cuts across themes within the Plan. However, it would be straightforward to include such statements under relevant sections. Specifically, we recommend that :</p> <p>In Chapter 2, a short section is added titled, 'Special Quality : Horses on the Gower'. Relevant information under each of the headings should be included relating to 'Status', 'Drivers for Change', 'Current and Future Trends', 'Potential Monitoring and Indicators'.</p> <p>In Chapter 3, some discussion is provided of activities relating to horses on the Gower,</p>	

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	<p>perhaps subsumed within the 'Tourism' section.</p> <p>In Chapters 4 and 5 relating to 'The Vision' and 'The Strategy' for the Gower AONB that specific statements on objectives are included which relate to horses under some or all off the sub-sections on 'Recreation', 'Tourism' and 'Awareness and Understanding'.</p> <p>9 Friends of Swansea Horses is aware that the draft Management Plan is close to finalisation. We are also aware that a formal consultation closed on 19th December 2014. Unfortunately, we were unaware of this until very recently and are knowingly submitting this report 'late'. However, we believe that the proper management of horses on the Gower firstly for their welfare, but also because of their role in tourism, recreation, awareness, and landscape are too important to ignore or to leave out of this essential Plan.</p> <p>10. We hope that the Gower AONB Partnership Group will give this comment urgent consideration. Friends of Swansea Horses will be pleased to submit specific recommendations for content of the Plan relating to horses. We could do so rapidly – over a period of less than a week if needed – to assist finalisation of the Plan.</p>	

CHRIS LINDLEY
GOWER AONB TEAM LEADER
6 DECEMBER 2016