



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Appendix 3
Ein cyf/Our ref: Gower AONB

Plas Gwendraeth
Heol Parc Mawr
Cross Hands
Llanelli
Sa14 6RE

[REDACTED] AM
Pontardulais Road
Gorseinon
Swansea
[REDACTED]

Ebost/Email: [REDACTED]@cyfoethnaturiolcymru.gov.uk/
[REDACTED]@naturalresourceswales.gov.uk
Ffôn/Phone: 03000 [REDACTED]

04 December 2015

Dear [REDACTED]

Thank you for taking the time to meet with officers from Natural Resources Wales and Swansea City and County Council in October regarding your constituent, Mr [REDACTED] queries in relation to the Gower Area of Outstanding Natural Beauty (AONB) boundary. Natural Resources Wales is Welsh Government's statutory adviser on landscape in Wales and has legal responsibility for designating new National Parks and Areas of Outstanding Natural Beauty (AONB) and powers to vary their boundaries subject to confirmation by Welsh Ministers.

We understand that Swansea C&CC will respond to you separately with regard to the queries relating to the Gower AONB boundary and the various local plans.

We have now carefully examined the issues raised in more detail and set out below is our response to the action points allocated to us following our discussion:

Confirmation that the boundary mapping exercise was a technical mapping exercise

Programme of transferring Protected Area Boundary Mapping onto digital media

During the early 2000s our predecessor organisation, the Countryside Council for Wales (CCW) embarked on a programme of transferring all Protected Areas boundaries onto Geographical Information Systems (GIS) digital media. This programme of work included all of the Protected Areas such as Sites of Special Scientific Interest, National Nature Reserves, National Parks and Areas of Outstanding Natural Beauty (AONBs).

The original boundaries for AONBs were on paper Ordnance Survey (OS) maps scaled at 1:63360 (1" to mile). This scale is much coarser than Ordnance Survey digital MasterMap system. There are inherent limitations of transposing a map drawn at 1:63 360 (1" to 1 mile) to the sophisticated level detail of OS MasterMap at 1:2500 (25.344 inches to the mile). Features and symbols are less detailed and necessarily generalised at the small scale mapping used for the original Designation Order Map and the level of accuracy is far less than expected with modern mapping techniques.

The map published with the Designation Order is the formal legal boundary. Updating our mapping media from paper to digital or updating of digital boundaries to new basemaps does not represent a legal change as no boundary variations have been made, it is merely the transfer of data from paper to digital media.

Interpreting Original Designation map for GIS

As part of this programme the original digital data for Gower AONB was captured at 1:50,000. Then in 2010 the boundary was interpreted to the more and accurate OS basemap product OS MasterMap at 1:2500 scale.

The interpretation of boundaries to the new detailed GIS maps was carried out by CCW's GIS Cartographic Team in consultation with relevant CCW staff (Protected Landscapes teams and Regional representatives) and colleagues in relevant external authorities such as National Park Authorities and AONB Local Authorities.

When undertaking the transfer of the boundary onto GIS we were mindful to consider that:

- as this was the first AONB to be designated in the England and Wales, there was a lack of precedence for boundary setting conventions for AONBs at the time;
- there was no accompanying Boundary Description Statement such as those which accompany National Park designations;
- the proximity of certain sections of the boundary to urban development means that certain areas have undergone significant change since the original map for the Gower AONB was drawn fifty-nine years ago making it in some instances difficult to relate the boundary to current features on the ground.

Given these considerations and the process set out above, this piece of work of transposing the map boundary onto GIS resulted in the agreed interpretation that is now available from 'Lle – A Geo-Portal for Wales' GIS downloads.

Any change to the existing boundary would require a boundary Variation Order to be submitted by NRW or a predecessor organisation under s82 Part IV Countryside and Rights of Way Act 2000 to the relevant Welsh Government Minister. No such boundary Variation Orders have been submitted, the original boundary remains unchanged since the Designation Order was confirmed on 10th December 1956

Background from the Designation History Series on the exclusion of the foreshore area from the final boundary in 1956

Careful examination of the information held by NRW has yielded a key source of information, which is an unpublished report commissioned by the Countryside Agency titled the 'Designation History Series Gower AONB', Ray Woolmore, May 2005.

Due to the time elapsed we have been unable to establish the exact reason from the Minister for Local Government and Housing's decision to exclude the foreshore area but the attached copies of the relevant folios from the Designation History Series Report

provide an insight into the detailed survey and consultation with the relevant local authorities by the then National Parks Commission between 1955 and 1956. Unfortunately some of the copies of the documents are quite faint due to faded nature of the originals from the 1950s.

Blackpill Site of Special Scientific Interest designation and boundary

Regarding the query on the designation process for Sites of Special Scientific Interest (SSSI) and the boundary for Blackpill SSSI as referred to in the meeting.

In summary, the SSSI designation process involves the selection of sites after detailed survey and evaluation against published criteria for features of flora, fauna, geology or geomorphology. The boundaries are drawn to include the area of land with this interest, shown on the map provided as part of the SSSI's notification along with a description (citation) of the site's special interest, a list of operations requiring consultation with NRW and a Site Management Statement.

We have provided the links from our web site's "designated sites search" showing the boundary and citation for Blackpill SSSI (which was notified in 1984). For this SSSI the qualifying bird species features are the sanderling and ringed plover.
https://naturalresources.wales/media/659835/SSSI_1120_Map001368d.pdf

https://naturalresources.wales/media/659830/SSSI_1120_Citation_EN001ddfb.pdf

Further information on SSSIs, the designated sites search and an outline of the process of notification is contained within the "Protected areas of land and seas" section of our web site: <https://naturalresources.wales/conservation-biodiversity-and-wildlife/find-protected-areas-of-land-and-seas/sites-of-special-scientific-interest-sssis/?lang=en>

A request was also made at the meeting in relation to Mr [REDACTED] being provided with a chronology of the relevant Local Authority Planning maps. We understand that City and County of Swansea will respond separately on this matter.

We hope that this letter and attached documentation provides a full response to Mr [REDACTED] queries and I apologise it has taken longer than anticipated to provide you with all the information to address the queries discussed at our meeting. Should you or Mr [REDACTED] require any further clarification, please do not hesitate to contact me.

Yours sincerely

[REDACTED]
[REDACTED]
Operations Manager West

CC: [REDACTED] – Planning Policy Team Leader, Swansea C&CC



CITY AND COUNTY OF SWANSEA
DINAS A SIR ABERTAWE

[REDACTED]
[REDACTED]
Gorseinon
Swansea
[REDACTED]

Please ask for:
Gofynnwch am:
Direct Line:
Llinell Uniongyrchol:
E-Mail:
E-Bost:
Our Ref:
Ein Cyf:
Your Ref:
Eich Cyf:
Date:
Dyddiad:

[REDACTED]
01792 [REDACTED]

[REDACTED]@swansea.gov.uk
8 December 2015

Dear [REDACTED]

Gower Area of Outstanding Natural Beauty (AONB)

I write to complement the contents of [REDACTED] letter (Natural Resources Wales), dated 4 December 2015.

The remaining action arising from our meeting on 2 October is to provide a chronology of the relevant local planning authority development policy maps showing the Gower AONB boundary.

The Council affirms the position outlined by Natural Resources Wales - that the map published with the AONB Designation Order is the formal legal boundary, and that this remains unchanged since its confirmation on 10th December 1956.

The boundary of the AONB as depicted in the various versions of the development plan is only the Council's interpretation of its alignment. The alignment has always been intended to follow the original order and if there are any areas of dispute these may be corrected at any time and do not require amendment through the development plan preparation process. Welsh Government guidance on LDP preparation explicitly states that statutory designations such as the AONB are matters of fact which should not be shown on the LDP Proposals Map, but on an accompanying Constraints Map. This Constraints Map was published in April 2012.

In this context, please see the attached Annex; this provides images of the relevant local planning authority development policy maps for the Mumbles Hill area, with an associated commentary on how the AONB is depicted in each.

ENVIRONMENT DEPARTMENT/ADRAN YR AMGYLCHEDD

Civic Centre, Oystermouth Road, Swansea, SA1 3SN
Canolfan Ddinesig, Heol Ystumllwynarth, Abertawe, SA1 3SN

☎ (01792) 635600

☎ (01792) 635797

Text Phone: (01792) 635609

✉ evh@swansea.gov.uk

🌐 www.swansea.gov.uk

To receive this information in alternative format, please contact the above.
I dderbyn yr wybodaeth hon mewn fformat arall, cysylltwch â'r person uchod.



INVESTORS | BUDDSODDWYR
IN PEOPLE | MEWN POBL

I hope that this information now completes the response to Mr [REDACTED] queries.
However, please do not hesitate to contact me if any further clarification is required.

Yours sincerely

[REDACTED]

[REDACTED]
Gower AONB Team Leader

cc. [REDACTED] Operations Manager West, Natural Resources Wales

MUMBLES HILL & PIER
A CHRONOLOGY OF DEVELOPMENT PLAN MAPPING
BY THE LOCAL PLANNING AUTHORITY
(1955 - 2015)

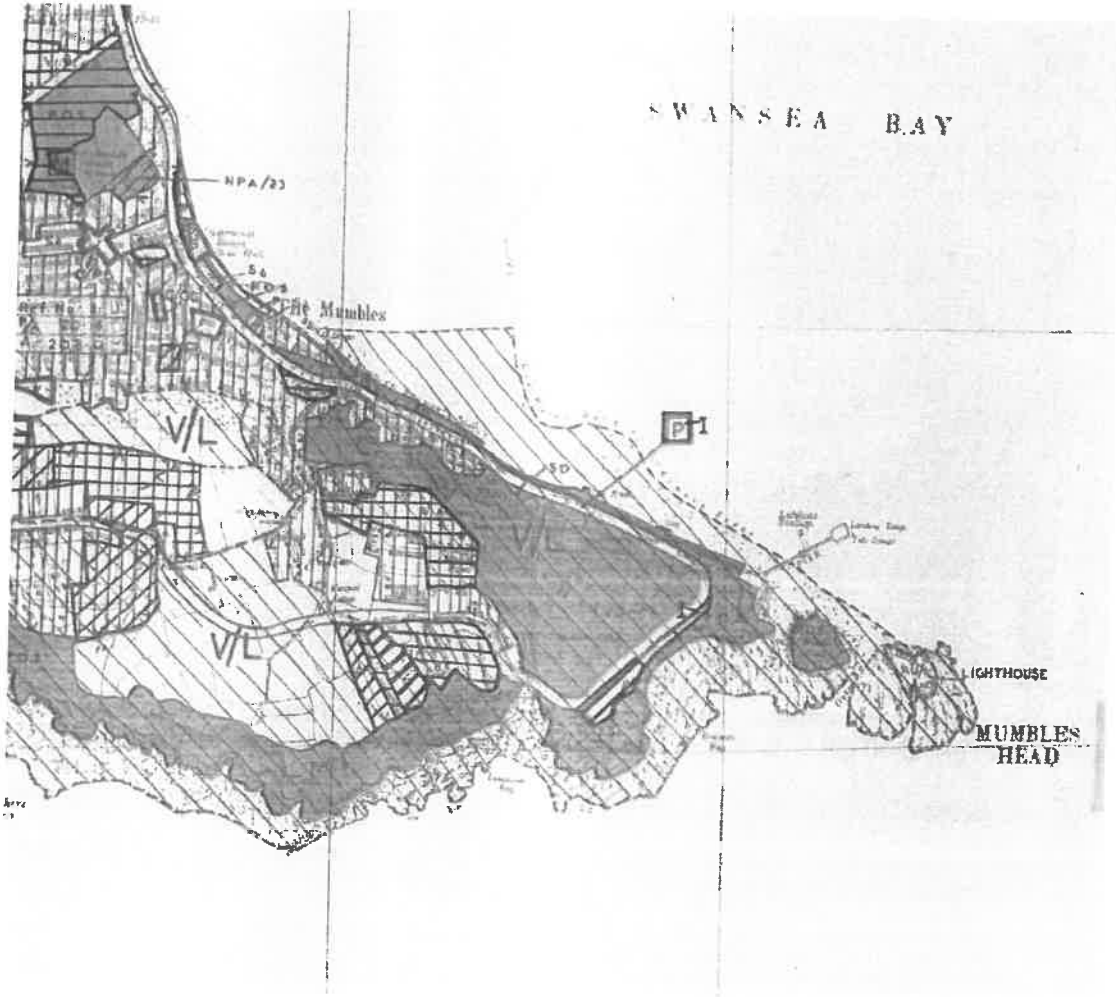
Date	Plan	Commentary
Feb 1955	County Borough of Swansea Town Map Programme Map	<p>This Map predates the designation of the AONB. Mumbles Hill is identified as an 'Area of Great Landscape Value' (shown hatched and annotated V/L). This designation extends out into the Bay to the Low Water Mark and returns to shore along Grid Ref line 88 rather than any natural feature.</p> <p>The additional green-shaded Public Open Space (POS) excludes the Thistleboon Caravan Park site and whilst it lies within the wider V/L designation the site specific allocation is O/A 'Non-Statutory Allotment'. The Pier and Hotel are excluded from the POS designation but within the V/L area.</p>
Dec 1959	County Borough of Swansea Town Map Programme Map Reprinted Version	<p>The V/L - Area of Great Landscape Value (thicker dashed line) has been revised and no longer extends out into the Bay. It also includes within it NPA/87 – 'Gower Area of Outstanding Natural Beauty Order' (thinner dashed line). Thistleboon Caravan Park is shown as within the V/L area but outside the AONB and is now designated HC 'Area where facilities are to be provided or maintained for holiday camping'.</p> <p>The AONB boundary continues to the rear of the properties at Southend along the Cliffside of Mumbles Rd; before cutting down to the foreshore at the pier, excluding the Mumbles railway terminus but including the pier hotel.</p>
Dec 1989	Swansea City Council Local Plan Proposals Map: Urban Area Sheet 1	<p>This is the first development plan to have been adopted and published by the Council for 30 years.</p> <p>The AONB boundary (depicted by a dashed and double-dotted line) is superimposed on a rudimentary base map, but is shown to exclude the whole of the Thistleboon Caravan Park site and the properties at Southend. It also shows the AONB boundary following the cliff side of Mumbles Rd, not the pier road, before dropping down to the pier at the exit road just before the Big Apple. It includes the hotel at the pier. i.e. no change since 1959 Town Map</p>

Date	Plan	Commentary
		<p>The proposals map boundary was published on line and although it is accessed through the Council's website it is actually externally hosted by Blue Fox Technology an interactive mapping company. The interpretation of the AONB boundary has not been amended since.</p> <p>http://swansea.devplan.org.uk/map.aspx?map=41&layers=all</p>
April 2012	City and County of Swansea Environmental Constraints Map to support the Local Development Plan	<p>No change of position of LDP boundary</p> <p>http://www.swansea.gov.uk/article/10246/Constraints-map</p> <p>Also shown in Oystermouth Ward Profile (May 2013)</p> <p>http://www.swansea.gov.uk/ldpwardprofiles</p>

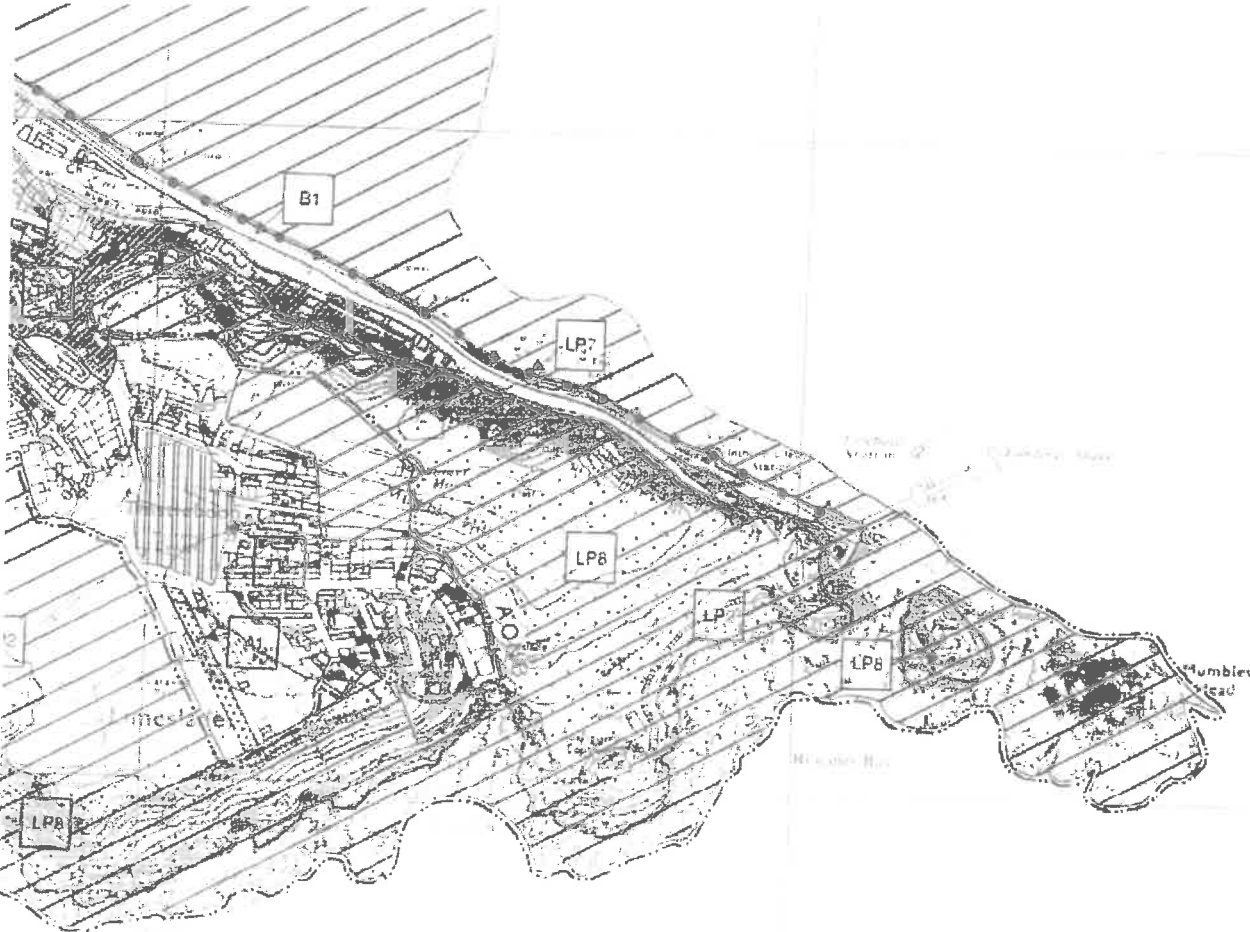
Note

Any other versions of the above plans have no status and no weight may be attributed to them. Any plans within supplementary planning guidance documents that do not accord with the adopted plan that they support also carry no weight.

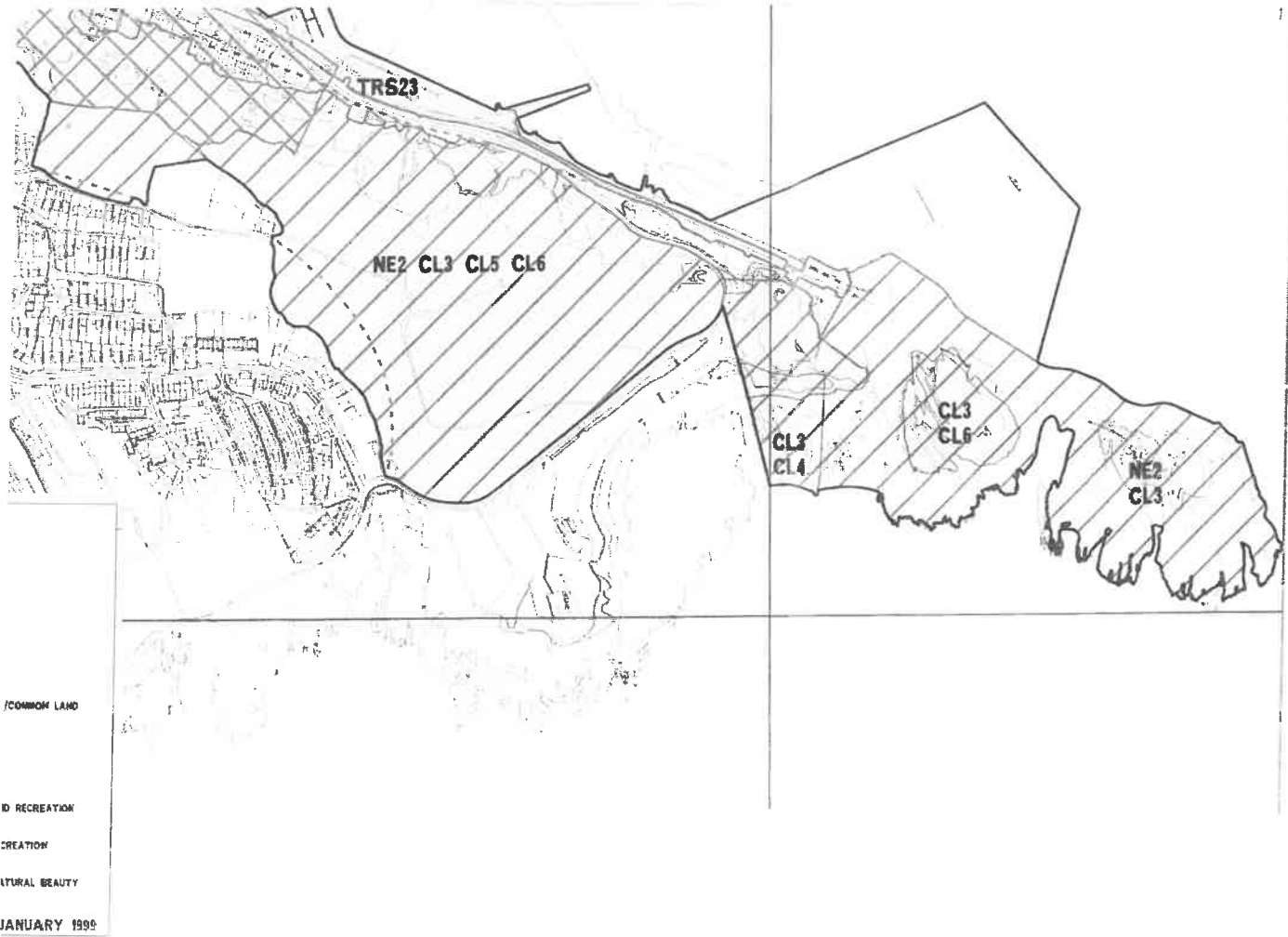
City of Swansea —Development Plan—Town Map (1955)



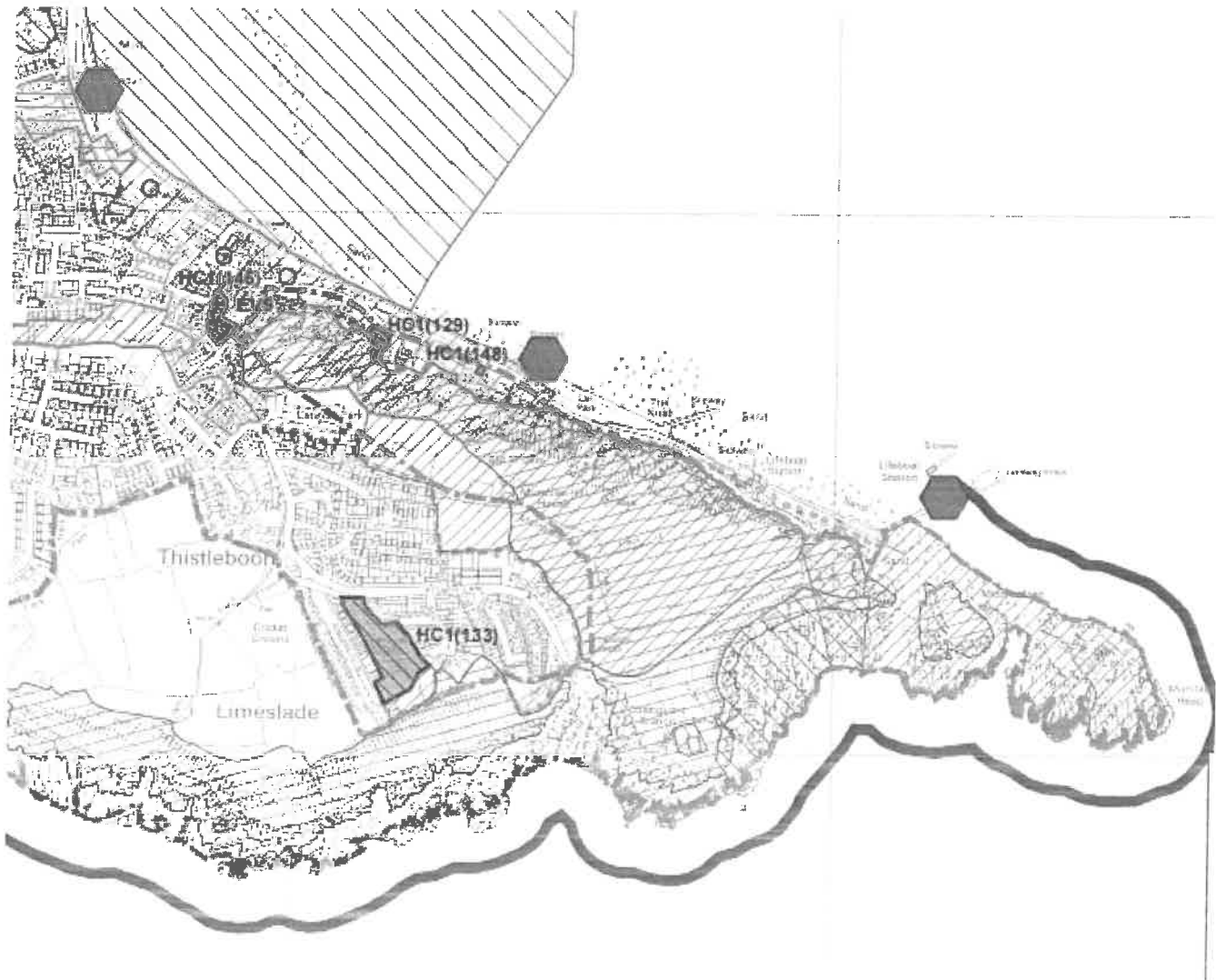
sea City Council—Local Plan (Urban Area Sheet 1)



City of Swansea—Local Plan Review No.1 (Mumbles Inset)



isea—Unitary Development Plan (Extract from Urban Area South)



Manse—Environmental Constraints (Oystermouth Ward Profile)

