

## Record of Public and Stakeholder comments and authority responses to additional public consultation undertaken in 2020

## Comments on the proposed amendments to the Conservation Area boundary to include no's 420-488 Mumbles Road

Respondent	Summary of comments	Council response	Recommended change
2	Supportive of extension of Conservation Area boundary. As raised during 2018 consultation, I was concerned that Underhill Park was not included in the proposed boundary expansion.	Parks and recreation land (including playing fields) are protected under policy S1 5: Protection of Open Space of the adopted Swansea LDP. The policy notes the importance to retain and improve community recreation land to maintain access to open spaces, promote healthier lifestyles and tackle health inequalities. It is considered that the policy protection in place is sufficient to control development at Underhill park and the further significant expansion of the Conservation Area boundary would not be warranted or necessary to impose additional controls to this open space. The proposed boundary expansion abuts the eastern boundary of Underhill Park (Langland Road), and should development proposals be forthcoming, in addition to the specific 'Protection of Open Space' policy, the setting of the Mumbles Conservation Area would also form part of the officer assessment.	No change.
12	Why isn't the Pier included in boundary?	Mumbles Pier, including the Lifeboat Station and slipway is Grade II listed and therefore already affords a greater protection. There is no proposal to expand the Conservation Area to take in Mumbles Pier.	No change.
3	In favour of an enhanced conservation area. Development for developments sake is a waste of time and shoddy blanket style modern construction would cause more harm than good.	Support for the extension to the conservation area boundary is noted.	No change.
4	Extend the conservation area boundary further to include Mumbles Road with SA3 5TN postcode (no's. 364-390) – the characterful row of houses on Mumbles Road between Norton Road and Norton Avenue.	The proposed expansion of the Conservation Area boundary seeks to encompass adjoining areas of similar architectural/ townscape character or quality. These properties, no's 364-390, form part of Norton, an area which is viewed as separate to the 'Mumbles' area, and subsequently, a boundary expansion to this extent which would then incorporate parts of Norton would not be appropriate.	No change.
6	This area should be left as 'green land'. More houses will not improve the area and will ruin the landscape.	The area to which the proposed extension seeks to encompass relates to existing buildings, namely no's 420-488 Mumbles Road. The area of green space which these comments may make reference to is the parcel of open green space north of no. 420 Mumbles Road and to the rear of properties located along Castle Acre. This area of land is within the extended conservation area boundary however no works are proposed to change the character and appearance of this open space.	No change.
8	Initial reaction to extension was one of ambivalence. In some ways it is nice to be included and have an acknowledgement that the properties on Mumbles Road, may have some collective value. On the other hand it is over 50 years since Conservation Areas were introduced, over 50 years since the original Conservation Area was designated and over 30 years since the requirement to review such areas was introduced by	The points are noted, as is the lack of support for the expansion. In terms of review, the Council is required to review conservation areas from 'time-to-time', with the review process involving the local community and stakeholders. The Conservation Area designation does not stop change but it does require greater scrutiny of new designs and a 'preserve or enhance' test to new development.  The pre-application process is beneficial for applicants as any development	No change.

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	<p>the 1990 Act. Clearly a lot of water passes under the proverbial bridge in this length of time and in many ways it's comforting to be left alone to be one's own arbiter and not subjected to additional and potentially more onerous controls than have previously existed. The present proposals could represent a large stick with a very little carrot in return. By way of example, it was amusing to note that householder requests for guidance on works would be chargeable. If the area should be designated, I would have hoped that the action plan would have indicated that the Council would have shouldered its responsibilities and taken a lead in improving the 'public realm', which I feel badly needs it. Unfortunately, in the absence of any positive proposals to do anything, I do not feel I can support the designation.</p>	<p>proposal can be critiqued prior to the submission of a formal application and this enables the opportunity to consider any issues and, if necessary, amend proposals before they are finalised and submitted. There is a charge associated with pre-application advice. Additionally, there is a 'Living in your Conservation Area' leaflet which has been produced by the Council and this sets out the effects of living in a conservation area to local people (in a positive way).</p> <p>In terms of public realm, the Management Framework notes that public realm has a significant contribution to the appearance and use of the area, and that modern day living and the requirement for vehicles and parking often result in the overall quality and character of an area being diluted. A streetscape strategy could include shared surface improvements, de-cluttering of pedestrian space, with the primary focus being the pedestrian environment. The document contains guidance on simple palette of materials, planting and street furniture considerations that should be taken in any wider regeneration strategy for the area.</p> <p>Most notably, the important public spaces along the seafront promenade owned and managed by the council, require a comprehensive management plan to coordinate and maintain the designs, materials and planning of these key locations. The plans continue to progress for the Coastal Protection scheme in the area, between Knab Rock and the Dairy Car Park, which is subject to separate public consultation. As well as flood risk management, the scheme will seek to preserve and enhance the promenade and seafront amenities such as widening the promenade at pinch-points and enhance public realm to create a high quality, sustainable and attractive waterfront.</p>	
9	<p>Agree with the inclusion of the 'Northern Seafront Approach' into the proposed Mumbles Conservation Area Boundary expansion. I had suggested that this would be a logical addition to the Conservation Area during the 2018 consultation.</p>	<p>Support for the extension to the conservation area boundary is noted.</p>	<p>No change.</p>
10	<p>Supportive of proposed expansion – a great idea!</p>	<p>Support for the extension to the conservation area boundary is noted.</p>	<p>No change.</p>
11	<p>Agree with comments and support the extension of the Conservation Area.</p>	<p>Support for the extension to the conservation area boundary is noted.</p>	<p>No change.</p>
12	<p>Positive expansion to the area. Could Mumbles headland be included?</p>	<p>No boundary changes are proposed to incorporate Mumbles Headland. The adjoining 'wooded hillsides' form part of the original Conservation Area boundary and are a particularly important undeveloped backdrop and create a strong edge and setting for the historic townscape. Mumbles Headland however, is protected in its own right being designated a Local Nature Reserve in 1991 to protect the site for both wildlife and people.</p>	<p>No change.</p>

Other comments

Respondent	Comment	Council Response	Recommended change
1	<p>An excellent review. Some points of detail:</p> <p>Page 29 Overland Road: The illustration 'mix of designs – new builds on left...' This is mistakenly included in the Overland Road section. It is a view from Church Park, where it joins Westbourne Place at the top of Church Street. The early C20th houses in distance are in fact part of the 1860's Coastguard Station (the former coastguard captain's house in the foreground). Page 25: One of the few unshaded areas, fronting Westbourne Place, Upper Church Park and Overland Road was acquired in 1859 for the Coastguard service. The Coastguard Station has played a significant part in Mumbles history (see online articles by Carol Powell) from the 1860's to the 1950's. The captain's house, six cottages and former office are all, postally, in Upper Church Park as their front doors originally faced inwards to the exercise yard and flagstaff. Being some 40 years older than the western terraces on the map, do they not deserve recognition as 'positive buildings'? The new build house (2a Westbourne Place) in the page 29 picture has replaced the rescue equipment shed shown in the NE corner of the map, and no. 2 Westbourne Place, was also built on the former coast guard site in 1960.</p>	<p>The support for the review is noted.</p> <p>The image on page 29 has been corrected.</p> <p>The information relating to the former Coastguard Station at the site where Westbourne Place meets Upper Church Park is welcomed. It is agreed that the former Coastguard Captain's house, office and associated six terraced cottages which all face inwards onto a former central courtyard/exercise area should, given their historic significance, be included as 'positive buildings' on the plan on page 25.</p>	<p>Image on page 29 of the document to be corrected.</p> <p>The plan on page 25 to be updated to include the former Coastguard Captain's house, office and six associated cottages as 'positive buildings'.</p>
7	<p>What are the implications of being in a conservation area? If we have a planning approval for a small extension and a dormer at the back of the property, what is the impact? What would be the restrictions at the front of the house to colour, window and door style, etc? Does it have any impact on this suggestion? Are there any other restrictions with being in a CA?</p>	<p>Any planning consent remains unchanged and the works can proceed as per the approval.</p> <p>There are no restrictions in place in terms of the colour you can paint the front elevation of your property. Following previous comments in relation to the initial 2018 consultation exercise, a new para 7.3.7 has been added to the document making reference to owner/occupiers taking a 'pragmatic approach when considering painting their properties on the basis of the visual impact such work can have on the character and appearance of the conservation area'.</p> <p>The Management Plan (Section 7) sets out the approach to repairs and alterations, which includes window and door styles. Whilst uPVC windows and doors may be permitted, there is an emphasis on appropriate repair works to existing windows and doors where possible, and an encouragement for 'like-for-like' replacements.</p> <p>In terms of 'other restrictions', the designation as a Conservation Area does not mean that no change can occur or that only traditional design is permitted, rather that there is a greater level of design and development control linked to Swansea LDP policies, and the main consideration is whether any proposed meets the 'preserves or enhances' test.</p>	<p>No change.</p>
8	<p>Initial feelings are that there is a little too much stick and not enough carrot. Sadly, I can't imagine the Council making any positive contribution to the public realm, which in my opinion,</p>	<p>The Management Plan notes that public realm makes a significant contribution to the appearance and use of the area. As noted in the 2018 responses, a</p>	<p>No change.</p>

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	really needs it.	streetscape strategy could include shared surface improvements, de-cluttering of pedestrian space; the primary focus being improvements to the pedestrian environment and the space in front of commercial units. Whilst general maintenance works to the streets sits outside the remits of the conservation area review, the document contains guidance on the required simple palette of materials, planting and street furniture considerations that should be taken in any wider regeneration strategies for the area. Most notably, the important public spaces along the seafront promenade owned and managed by the council, require a comprehensive management plan to coordinate and maintain the designs, materials and planning of these key locations. Specifically in this seafront location, the council, along with private consultancy, is working on a coastal protection scheme in the area between Knab Rock and the Dairy Car Park (subject to separate public consultation). The scheme aims to address the current condition of the sea wall and provide an improved standard of protection against the risks of flooding. It will provide the opportunity for the widening of the promenade, improve accessibility of the foreshore and enhance the public realm to create a high quality, sustainable and attractive waterfront. The scheme will require careful design to integrate the new defences with adjacent areas of existing public realm, areas of existing public open space and highways.	
8	If this review had been carried out nearer to the making of the original CA designation then perhaps a lot of damage to residential property features could have been avoided. I'm not sure whether it's possible to put the clock back, now, or where it would go back to.	The Council is required to review conservation areas from 'time-to-time', with the review process involving the local community and stakeholders. Whilst it is not possible to 'turn back the clock', it is important that property owners and occupiers adopt the right approach to repairs, extensions and alterations. There is an awareness raising necessity to inform householders of the importance of 'street character' and the contribution that individual residences make to that. A 'Living in your Conservation Area' leaflet has been produced by the Council which sets out the effects of living in a conservation area to local people (in a positive way). Notwithstanding this, the Conservation Area designation does not stop change but it does require greater scrutiny of new designs.	No change.
2	The Management Plan scheme sounds as if it has promise.	The support for the Management Plan is noted.	No change.
5	Mumbles should be developed, it's a district that should be a cash cow for the rest of the city. It needs more night life, more attractions, and better transport links. If you give the place any kind of protected status you will just be binding your own hands, and empowering local residents to hold back progress. The people of Mumbles have money and education on their side, they don't need to be handed more tools to use.	<p>The Mumbles Conservation Area was first designated in 1969. This current review is undertaken on the basis that the Council is required to review conservation areas 'time-to-time', with the review process involving the local community and stakeholders. The process includes a review of the conservation area boundary and proposes significant adjustments should be made to take account of the historic value and interest of areas with potential for conservation.</p> <p>It is noted that a number of previous public houses/ nightlife venues have shut in recent years. This is however due in part to peoples change in social habits and has no bearing on the conservation area status.</p> <p>The point with regard to better transport links is acknowledged. This is a wider strategic project which falls outside the remits of the Conservation Area review. Likewise, more sustainable travel solutions could be explored to lessen traffic / parking congestion in the area, i.e. park and ride / shuttle buses, which would fall outside the remits of this conservation area project. Additionally, the Santander Cycle scheme has now been implemented which provides a docking station in Mumbles (adjacent to Southend Park).</p> <p>There are wider strategic initiatives to provide new/ enhanced active travel links in the area.</p>	No change.

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9	In general agreement with the Character Appraisal and the division into proposed Character Areas. Agree with the proposed Management Plan but am concerned as to whether Swansea Council has the necessary powers and specialist staff to ensure compliance.	Support for the Character Appraisal and division into Character Areas noted.	No change.
2	<p>I feel very concerned about what I perceive to be the general decline in Conservation Areas. It seems now that 'anything goes' and there no longer seems to be the will to preserve and enhance.</p> <p>The status of the three tennis courts and bowling green has become increasingly fragile; one tennis court has been sacrificed to the developing of Oyster Wharf. The remaining courts have not been restored to make playable. Enforcement by the council has become a lottery and sadly all this is happening in the centenary year of the Bowling Green. This contrasts with the restoration of the courts in de la Beche Road.</p> <p>Concerns raised regarding Newton Conservation Area, specifically in relation to 165A Newton Road, a restoration project which has stalled. What can be done to ensure ambitious projects are completed? The same issue has arisen at the backland site behind 19 Melcorn Drive – this was allowed on the long narrow gardens which were survivors of the medieval pattern. After years the developer cannot sell it and it remains incomplete with the promise to restore the three mature (TPO) trees not followed up on.</p>	<p>The views regarding the perceived general decline in Conservation Areas is acknowledged. The designation does not stop change, but it does require greater scrutiny of new designs. Once an area has been given conservation area status, the local planning authority is required to ensure that desirable features of the area are either 'preserved or enhanced' through the planning process. The planning policies typically require retention of historic features and a higher quality of design in new developments. The review of the Mumbles Conservation Area will include guidelines to help protect and enhance the special character of the area.</p> <p>The tennis courts are located within the existing Conservation Area boundary, and subsequently the 'preserve or enhance' test would be applied to any application for development at the site.</p> <p>In terms of the Bowling Green, para 5.2.3 makes reference to this area, "...between the two built up areas are tennis courts and bowling greens lined with trees. An attractive small sports pavilion provides a heritage note which should be protected". It is recommended that the bowls pavilion is included as a 'positive' building. In addition, the significance of the pavilion building is acknowledged in para 7.8 'Local Listing in the Conservation Area', identified as a structure / building worthy of additional protection by being included on a Local List of heritage buildings and structures.</p> <p>The concerns relating to Newton Conservation Area are noted. Planning permissions are granted with a standard condition requiring development to commence within a specified period but there is no requirement for a completion date.</p>	No change.
2	I hear that a 'Direction 4' applies to the Conservation Areas in Mumbles/ Gower. How can this be utilised to protect what remains and in the long term?	Article 4 Directions can be imposed by local planning authorities to control certain alterations to dwellings that would otherwise be 'permitted development' under the GPDO and not require planning permission. The implementation of an Article 4(2) Direction for residential properties provides increased protection especially where there is threat from small scale unsympathetic works. The removal of permitted development rights is a separate process to the conservation area review and will require further consultation.	No change.
12	Fully supported of the review and expansion but what will this mean for householders who want to undertake work, for example to windows and doors? Will there be additional restrictions in terms of what work can be carried out?	<p>Importantly, the designation does not stop change, but it does require greater scrutiny of new designs. To help householders, a 'Living in your Conservation Area' leaflet has been produced by the council which briefly sets out the effects of living in a conservation area to local people (in a positive way).</p> <p>Once an area has been given conservation area status, the local planning authority is required to ensure that desirable features of the area are either 'preserved or enhanced' through the planning process. The planning policies typically require retention of historic features and a higher quality of design in new developments. The review of the Mumbles Conservation Area will include guidelines to help protect and enhance the special character of the area.</p>	No change.
12	There appear to be many new developments which fail to respect the conservation area, i.e. Oyster Wharf, M&S.	The development of individual infill plots, such as Oyster Wharf and the new	No change.

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		<p>M&amp;S development, inevitably reflect the design and taste of their eras, but on the basis that they have respected the principles of the historic building line, and of the scale, massing and form of their neighbours, such developments are generally absorbed into the streetscene with success. For example, the fundamental design theme for the Newton Road area is identified as gable dormers and first floor bay windows above shopfronts. The redevelopment of the former British Legion site, now mixed use commercial with residential above, is considered to enhance the area, incorporating features that are characteristic of the area.</p>	
12	<p>Concern as to how the woodland area at Mumbles Headland is being managed.</p>	<p>Paragraph 7.6.7 of the document notes that, “The steep wooded hillsides above the Conservation Area provide a valuable setting and boundary for the Conservation Area. The protection and management of these spaces is vital to ensure the long term setting for the village”. Whilst certain areas of this wooded backdrop are in private ownership, the 23 hectares of Mumbles Hill was declared a Local Nature Reserve in 1991 to protect the site for both wildlife and people. The Council, along with help from volunteers and local interest groups such as Mumbles Development Trust, manage the reserve but it is acknowledged that certain management issues arise from time to time.</p>	<p>No change.</p>
12	<p>There are many buildings which have unsympathetic alterations, uPVC / dormer extensions. What grant funding is available for residents to undertake works that are sympathetic to the conservation area?</p>	<p>It is noted that a significant number of buildings within the existing Conservation Area and the proposed expanded area display a loss of some of their traditional heritage qualities that gradually change the overall historic townscape. The proliferation of relatively minor building alterations can incrementally erode the character and appearance of the existing and proposed Conservation Area.</p> <p>The draft document identifies key ‘negative issues’ and problems, including inappropriate building alterations and repairs, such as replacement of wooden sash windows with UPVC frames and different window designs, inappropriate extensions, loss of heritage details and materials and use of inappropriate roof materials. It goes on to set out guidelines for external repair and alteration work. Whilst it is not possible to ‘turn back the clock’, it is important that property owners and occupiers adopt the right approach to repairs, extensions and alterations.</p> <p>There is an awareness raising necessity to inform householders of the importance of ‘street character’ and the contribution that individual residences make to that. A ‘Living in your Conservation Area’ leaflet has been produced by the council which briefly sets out the effects of living in a conservation area to local people (in a positive way). Notwithstanding this, the Conservation Area designation does not stop change but it does require greater scrutiny of new designs.</p> <p>In terms of funding, Mumbles Community Council have provided assistance in the form of grant aid in previous budgets to go towards the costs of improving the decorative condition of the retail premises along Newton Road. There is however no current grant funding available to residential renovation/enhancement schemes in the area.</p>	<p>No change.</p>