

**Canllawiau Cynllunio Atodol**

**Addasu Adeiladau Gwledig Traddodiadol**

**Adroddiad Ymgynghoriad Cyhoeddus**

**Swansea Council**

**Rhagfyr 2023**

## Cyflwyniad

1. Cymeradwyodd Pwyllgor Cynllunio Cyngor Abertawe fersiwn ddrafft o'r Canllawiau Cynllunio Atodol (CCA) Addasu Adeiladau Gwledig Traddodiadol at ddiben ymgynghoriad cyhoeddus ar 1 Awst 2023.
2. Cynhaliwyd proses ymgynghori cyhoeddus wyth wythnos ar fersiwn ddrafft y CCA rhwng 7 Awst a 6 Hydref 2023. Hysbyswyd yr ymgynghoriad ar we-dudalen 'Dweud eich dweud' a CCA Creu Lleoddedd a Chynllunio Strategol y cyngor. Roedd y tudalennau'n disgrifio'r ymgynghoriad, yn darparu gweddolen i'r ddogfen, ffurflen sylwadau ar-lein i'w llenwi a dolen i fersiwn pdf o'r ffurflen sylwadau. Dros 120 o benseiri, asiantiaid, ymgynghorwyr cynllunio, syrfewyr, grwpiau diddordeb a rhanddeiliaid; a phob cyngor cymuned a thref, cynghorwyr, swyddfeydd ac adrannau mewnol dethol.
3. Cafwyd ymatebion i'r ymgynghoriad a oedd yn cwmpasu ystod o faterion polisi, dylunio a threftadaeth. Derbyniwyd ymatebion gan sefydliadau allanol ac yn fewnol gan adrannau arbenigol yn y cyngor.
4. Mae'r holl ymatebion a dderbyniwyd wedi cael eu cofnodi yn y tabl a nodir yn y tudalennau canlynol. Mae'r sylwadau wedi'u categorio dan bob cwestiwn penodol a ofynnwyd yn y ffurflen sylwadau am yr ymgynghoriad. Mae'r tabl yn cynnwys

ymateb y cyngor i bob sylw a gyflwynwyd yn dilyn arfarniad llawn gan swyddogion.

5. Mae'r tabl hefyd yn amlinellu'r newidiadau a gynigwyd gan y cyngor i ddogfen y CCA o ganlyniad- mae'r testun newydd arfaethedig wedi'i danlinellu a thynnwyd llinell drwy'r testun a ddilëwyd.<sup>1</sup>
6. Darperir testun llawn yr holl ymatebion i'r ymgynghoriad a dderbyniwyd yn yr Atodiad i'r adroddiad hwn.

---

<sup>1</sup>Ymatebir yn y rhestr i'r sylwadau a dderbyniwyd yn Saesneg yn Saesneg.

**Comments Received**

Respondent	Comment	Response	Action
<b>1. Do you think the draft SPG is sufficiently clear in terms of what are the key relevant LDP policies that apply in relation to proposals for the conversion of traditional rural buildings</b>			
Black Mountain Conservation	<p>No.</p> <p>There is no mention of TAN 24. By nature of the fact that these are 'traditional' rural buildings, many are likely to belong to listed buildings or be in the vicinity of scheduled monuments. No mention has been given in the section on policy to the historic environment, the need to consider setting, the impacts of conversion on listed buildings, or the policies which apply if you are thinking of converting a building in the curtilage of a listed property. In fact, TAN 24 isn't mentioned at any point in the whole document.</p>	<p>There may be some traditional rural buildings that are listed buildings in their own right or curtilage listed. Therefore it is appropriate to cross reference to TAN 24 and section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 .</p> <p>Some traditional rural buildings may also have a relationship to the setting of a designated heritage asset such as a scheduled monument. Therefore it is appropriate to cross reference to the Cadw Setting Guidance.</p>	<p>New paragraph inserted into section 1 Aims and Purpose:</p> <p><u>“1.5 Where buildings or structures proposed for conversion are designated heritage assets such as listed buildings then the primary consideration will be the requirement to pay special regard to the desirability of preserving the listed building as set out in Section 16 of the Planning (Listed Buildings and Conservation Areas) Act and expanded upon in TAN 24: The Historic Environment. “</u></p> <p>All subsequent paragraphs renumbered.</p> <p>New paragraph after 2.7 as follows:</p> <p><u>“2.8 TAN 24: the Historic Environment (2017) provides national guidance on how to consider the historic environment in decision making. A ‘traditional rural buildings’ may in some instances be a Listed Building, curtilage listed building (as defined in Section 1(5) of the Act), or be in the vicinity of a Scheduled Monument. Conversion proposals affecting such buildings will need to consider whether Listed Building Consent is required for works, and whether a Heritage Impact Assessment is required alongside a planning application. Furthermore, the effect of the proposal on the setting of adjacent designated heritage assets, such as listed buildings or scheduled monuments, must be</u></p>

addressed. Cadw have prepared relevant guidance on setting analysis. Put as footnote: [Setting of Historic Assets | Cadw \(gov.wales\)](#)

2.11: Remove reference to LDP policy TR 5.

Amend paragraph 2.12 as follows:

~~“The full policy wording and supporting amplification for each of the above LDP policies is set out in Appendix A. Their broad aims and requirements are described below. This SPG also provides important information and guidance to augment LDP Policies TR5: Holiday Accommodation and HC2: Preservation or Enhancement of Buildings and Features.”~~

**“2.19 LDP Policy HC2 Preservation of Enhancement of Buildings and Features sets out criteria to be followed to ensure various types of designated heritage assets are preserved or enhanced through proposals, reflecting the requirements set in Legislation. It also emphasises that development must preserve or enhance conservation areas and/or their setting, which includes any proposals for the conversion of buildings.”**

Subsequent paragraphs renumbered.

Add further text focussing on designated heritage assets as follows:

#### **Designated Heritage Assets**

**“2.23 Where a building or structure is a designated listed building then the primary consideration is Section 16(2) of the Planning (Conservation Areas and Listed**

Buildings) Act 1990 which sets out the statutory requirement in determining application for listed building consent to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’. Paragraph 5.13 of TAN 24: The Historic Environment and PPW 11 provides further explanation of the considerations and these are mirrored in Policy HC2 of the Swansea LDP.”

-  
“2.24 There will be instances where a building or structure meets the test as set in Section 1(5) of the Act in terms of an object or structure fixed to the listed building or forming part of the land associated with the listed building prior to July 1948. In these instances the building or structure will be curtilage listed with the same designation as the primary listing and the considerations of Section 16(2) from the Act will apply.”

-  
“2.25 Where a building or structure is part of a Scheduled Monument then a separate consenting process via Cadw applies. “

“2.26 Some buildings or structures may be located in areas of heritage designation such as Historic Parks and Gardens and/ or Conservation Areas. In these locations the requirement as set in the Act is to preserve or enhance the character of the conservation area and preserve the character of the designated landscape.”

-  
“2.27 Some buildings or structures proposed for conversion may not be designated heritage assets as outlined above but may form part of the setting of a designated asset. In these instances LDP policy HC2 will

			<p><u>apply which generally sets the requirement to preserve the relevant setting. Further guidance on analysing and understanding is set in Cadw guidance ‘Setting of Historic Assets in Wales’, 2017.”</u></p> <p>Add new text within paragraph 3.26 (now 3.37) relating to the setting.</p> <p>Add a new paragraph:  <u>“3.37 Where the building proposed for conversion is an undesignated heritage asset but forms part of the setting of a designated heritage asset, then emphasis will be placed on the requirement set in legislation to preserve the setting and this may limit the acceptable alterations and may require the use of appropriate sensitive materials.”</u></p> <p>Paragraphs setting out factual information in respect of corresponding LDP policies refined and improved for legibility and accuracy.</p>
Cwmpas co op	Yes	Noted	No action required
<b>Question 2: Do you consider the draft SPG will assist in resolving whether a building is defined as ‘traditional’ for the purpose of a planning application?</b>			
Black Mountain Conservation	No.		<p>Para 3.1 amended to become paras 3.1 and 3.2 as a new overview to the Chapter:</p> <p><u>“3.1 Some of the most common types of traditional rural buildings that have become redundant and/or long term vacant within rural areas of Swansea include certain farm buildings, which is often the product of changes to traditional methods of farming and/or such</u></p>

"often stone but in some instances can include masonry and timber frames" - masonry is considered to be stone- it might be better phrased as often stone, but occasionally brick or timber frame.

Traditional construction is generally deemed to be pre-1919, in rural areas of Wales it is considered to extend to pre-war (1930s) buildings.

It is important to note that masonry can refer to both brick or stone. Plus there are many brick buildings of traditional character in rural areas .

The pre 1919 definition of a traditional building is not recognised in planning law. This date appears to be used for construction skills training. This SPG is not looking for a definite time cut off because there are many later buildings that have a traditional character and make a positive contribution to the rural landscape. Therefore it is not considered appropriate to refer to dates.

buildings now being functionally ill-suited to modern agricultural practices. In addition, chapels and churches have become vacant as a result of significant reductions in active congregations. In other instances, in order to obtain additional income streams, some occupiers of residential dwellings in rural areas seek to convert outbuildings to holiday accommodation. In the case of the latter example, only in certain instances would this guidance be applicable. For example relatively modern domestic garages are not traditional rural buildings. By following this Guidance, and the definitions set out with it, potential applicants will be able to assess whether a building can reasonably be considered a traditional rural building that is suitable for conversion.

**3.2 LDP Policy CV4 and this SPG are not applicable for any proposals for conversion of structures considered not a traditional rural building. Any such proposal will instead be considered against other relevant alternative LDP policies and guidance, as set out in Chapter 2 of this SPG."**

Paragraphs within section 3 have been rearranged and grammatically amended to improve legibility of document.

Paragraph 3.2 (now 3.10) amended to refer to brick and timber frames and also include reference to corrugated metal roof coverings:

"...can include ~~masonry~~ brick and timber frames. Occasionally metal structures can be present in a traditional building, however this would typically be in older buildings such as corrugated metal roof coverings".

Amend former paragraph 3.1 (now 3.5) to clarify that assessment of a traditional rural building is based on criteria as follows:

- Landscape setting
- Building character and form
- Materials
- Age

Amend paragraphs relating to the criteria as follows:

***“Landscape setting***

3.6 The overall appearance and character of an existing building within the wider landscape, and its contribution to the attractive countryside scene, is a fundamentally important element ~~is also important~~ to understanding whether or not a structure can reasonably be considered a ‘traditional rural building’. In order to appraise this aspect, an applicant may be required to undertake an appropriate, which may require landscape visual assessment to consider the impact of the proposed development from a range of public view points.

3.7 Proposals that area assessed as having a significant adverse effect upon the surrounding landscape and do not preserve the landscape setting will not be permitted, which is in line with policy requirements.

***Building character and form***

3.8 In terms of building form, most traditional buildings will have a pitched roof and have a modest footprint, which is important for a non-dominant presence in the landscape. There may be exceptions to this, for example traditional buildings that historically served as defence structures that typically have flat roofs.



3.9 The 'defence structure' example is also useful to highlight that the former and/or original use of the building is an important consideration. In order to be considered a traditional rural building it is expected that the structure will have been built, or used, for an activity that is typical of the rural landscape, as well as it contributing to the attractive countryside scene. Additional examples include agricultural uses, which are more typical in this regard, and uses relating to education, industry and community use. Other potential examples include infrastructure buildings or structures, which could include those associated with railways and water supply.

**Materials**

3.10 Building materials are a key aspect to consider when assessing whether a building within the countryside is considered 'traditional' or not. Many traditional buildings will be constructed of local materials, often stone but in some instances can include ~~masonry~~ brick and timber frames. Occasionally metal structures can be present in a traditional building, however this would typically be in older buildings such as corrugated metal roof coverings.

3.11 When considering the suitability of proposed materials, key issues for consideration include whether they are reflective of the wider area and landscape, whether they relate to the function of the building, and whether the materials are integral to the colour palette for the area.

**Age**

			<p>3.12 Another factor to consider in establishing whether a building is traditional is the age of the structure. Whilst there is no prescribed age for a traditional building, it is expected that they will be well established in the rural landscape and not recently constructed. “</p> <p>New subheading inserted ‘Other Factors’ to improve legibility.</p> <p>Para 3.14 (was 3.10) and 3.60 (was 3.47) – references to 10 year for buildings built under PD removed as follows, in order to add clarity and align with definition:</p> <p>3.14: “Buildings that were constructed via permitted development rights will be carefully assessed to ensure they were used for the <u>right use</u> bestowed by permitted development <del>for a minimum period of 10 years</del> previous to the application for conversion. This <u>approach</u> is consistent with <u>LDP Policies that do not support development</u> <del>the LDP approach to resist</del> proposals that would:...”</p> <p>3.60: “...under permitted development rights which have permanently ceased to be used for agricultural or forestry purposes <del>within 10 years from the date on which the development was substantially completed.</del> Proposals for conversion of ‘new’ buildings, <del>i.e. less than 10 years old</del>, will therefore come under particular scrutiny. Without evidence the original building has been used for the intended purpose for a significant period of time, i.e at least 10 years, proposals for...”</p>
	<p>Metal structures would be more likely found in mid to late nineteenth century buildings and onwards, i.e. when steel was</p>	<p>Disagree. Metal structures and corrugated cladding is a characteristic of rural buildings.</p>	<p>No change</p>

	first commonly used, with the occasional use of cast and wrought iron, for columns and roof trusses respectively, or for cladding and rooves (corrugated). Metal in older buildings is not accurate.	This has been recognised by appeal decisions, including the following case in Swansea from 2023 - Appeal reference: CAS-02862-X5H6S5	
	Traditional construction is generally deemed to be pre-1919, in rural areas of Wales it is considered to extend to pre-war (1930s) buildings.	The pre 1919 definition of a traditional building is not recognised in planning law. This date appears to be used for construction skills training. This SPG is not looking for a definite time cut off because there are many later buildings that have a traditional character and make a positive contribution to the rural landscape. Therefore it is not considered appropriate to refer to dates.	No change
Cwmpas Co op	Yes	Noted	No action required
<b>3. Do you consider further detailed guidance is needed in relation to the factors to be considered when deciding whether a building is traditional or not, such as in relation to materials; age; structure and form; overall appearance; etc.?</b>			
Black Mountain Conservation	Yes. Repeated from Q2. "often stone but in some instances can include masonry and timber frames" - masonry is considered to be stone- it might be better phrased as often stone, but occasionally brick or timber frame.	See Response to Q2.	Changes as outlined to Q2 above.

	<p>Metal structures would be more likely found in mid to late nineteenth century buildings and onwards, i.e. when steel was first commonly used, with the occasional use of cast and wrought iron, for columns and roof trusses respectively, or for cladding and rooves (corrugated). Metal in older buildings is not accurate.</p> <p>Traditional construction is generally deemed to be pre-1919, in rural areas of Wales it is considered to extend to pre-war (1930s) buildings.</p> <p>Additionally, some pictorial examples of traditional rural buildings from Swansea should be included. Powys SPG for development based on their town character appraisals gives clear examples of what the local design characteristics are. This could be provided as a gazetter appendix, with, e.g., windows- size, material, number; doors- likewise; render types- e.g., harled, stucco; setting. Refer to the Tywi Centre or the Welsh Traditional Building Forum so that people know where to go to extra help and support.</p>	<p>See Response to Q2</p> <p>The SPG emphasises the importance of understanding the character of buildings proposed for conversion. Some may be vernacular agricultural buildings, others may be post war industrial buildings or WWII structures. Therefore it is not appropriate to include an image gazetteer appendix because every case will be analysed and assessed on individual character and landscape setting.</p>	<p>No Change</p> <p>No Change</p>
Cwmpas Co op	No	No detailed comments provided for response to be issued	No change
<b>4. Does the SPG provide clear guidance on the type of buildings that can be converted, especially considering their location, form and structure</b>			
Black Mountain Conservation	yes	Noted	No change

Cwmpas Co op	Yes	Noted	No change
<b>5. Does the draft SPG provide clear guidance in relation to placemaking and design principles for any proposed conversions of traditional rural buildings to applicants/developers in and explain what is expected from applicants?</b>			
Black Mountain Conservation	No. Photos/ images on p18 - maybe emphasise that features which may detract from the traditional aesthetics of the building should be restricted to perspectives which are not seen.	Noted	The SPG does not promote any features which will detract from the traditional aesthetics of the building, whether they are viewed from a public vantage point or not.
	Requirement of ZTV mapping and imaging to establish minimum impact proposals.	A key message of the SPG is to understand the building proposed for conversion in the rural landscape setting. The establishment of the Zone of Theoretical Visibility (ZTV) is excessive for most conversion projects but the principle of establishing the range of public vantage points from where a building proposed for conversion can be seen is important as set out in paragraph 3.2.	The need to identify public view points to assess proposals is set in paragraph 3.5 but is now also emphasised in paragraph 3.26 (now 3.34) as follows: <u>"...be considered. The setting should be established by identifying the range of public view points from which the building can be seen and, where relevant, any other buildings or structures with which it forms a group. If necessary..."</u>
Black Mountain Conservation	Images show a large number of roof lights, but this could be achieved more sensitively - tinted glass to blend the windows into the slate, or on a different aspect, or in line with historic warehouses, ridge line glazing to allow maximum light penetration with minimal roof interference. I don't believe that the images used represent the text,	The images between paragraphs 3.26-3.27 have been taken from the adopted Placemaking Guidance for the Gower AONB, however one of the images has been omitted in error.	Correct images and text from the Placemaking Guidance for the Gower AONB SPG are added in section 3.

	particularly with reference to the windows and openings.	With both the poor and good examples these images are clear and rooflights are regularly approved in conversion proposals.	
	3.33 - perhaps certain of the permitted development rights should be withdrawn, rather than all of them? There are certain aspects of PD rights which wouldn't cause impact just because the buildings have been converted.	Certain Permitted Development Rights are routinely removed for rural conversion projects, in the context of countryside protection policies, but the decision is taken on a case by case basis.	No change
	3.34 I think a balance needs to be struck in rural areas where provision needs to be enhanced for economic or residential reasons, between the need for that provision, the requirement for energy and services to be carbon off-setting, and for measures to mitigate the visual impact of e.g., ASHP. The economic and environmental benefits of building reuse as opposed to new development are well documented. The impacts on our traditional building stock from climate change is also thoroughly considered, and so buildings which are able to mitigate these effects and contribute to more environmental construction should be considered, even if there is associated negative impact from certain aspects.	Where buildings are structurally sound then the principle of conversion can be addressed which embraces the embodied carbon from the reuse of an existing structure. Planning legislation does not currently address the carbon balance of differing construction and energy types and this cannot be addressed via this SPG without policies at the national or local level.	No change
Black Mountain Conservation	3.36 Again, does a ruined (and likely to become more ruinous, if not entirely derelict) agricultural building have better visual amenity than a ruined ag. building which has been sensitively rebuilt and	3.36: The issue of the structural stability of the building includes consideration of planning law issues re: abandonment.	No change, but paragraph added to confirm that architects plans MUST reflect the structural report findings.  Add paragraph 3.51

	<p>reflects the original character of the area. IF a building can be rebuilt, and there is evidence of its original construction, then surely reconstruction and reuse offers better community value and landscape aesthetics than a building left to fall down because it is economically unviable to repair and maintain a building with no use? Alternatively, approaches as per the Landmark Trust at Astley Castle could be used, whereby the original building is stabilised and the development is built within the space. Creative approaches should not be ruled out as a matter of principle, when the alternative is to do nothing.</p> <p>Placemaking checklist- archaeology - might be required for more than just the groundworks. Raising awareness of apotropaic marks (common in farm buildings), the need for maintaining patina and carpenters' marks etc. on original structural timbers. I would recommend that even if the building isn't listed, a site visit from an archaeologist or heritage consultant is a stipulation to help applicants ensure that the placemaking aspects of the application are met and that the significance of the building isn't compromised through a lack of understanding.</p>	<p>TAN 23: Economic Development para 3.2.1 states '<i>buildings must be capable of conversion without major or complete reconstruction</i>'.</p> <p>In a green wedge development involving the re use of a building is not appropriate if the building is not capable of being converted without major reconstruction.</p> <p>Rebuilding/reconstruction is not conversion.</p>	<p><u>"The architectural plans submitted in support of a planning application <b>must</b> show, and have a clear understanding of, what the structural stability report requires to enable the conversion of the building to take place."</u></p>
Black Mountain Conservation	P28- depth of reveal - should also be noted that in older traditional (particularly rural) buildings, reveals were flared and rounded.	The SPG does not just apply to vernacular agricultural buildings and not all reveals are flared and rounded Details such as depth of	No change

		reveal and corners would be identified on a case by case basis. The retention of details or appropriate new details would be controlled via planning condition.	
	Windows, v. Is it possible to open this up to aluminium windows, which are more flexible in terms of narrow glazing bars and don't have the same impact as UPVC. They are also minimal maintenance and greater longevity, so are a compromise.	Agreed	Amend row V to change title to Windows (remove UPVC) and amend text as follows:  “...frames. However the use of <u>uPVC or aluminium windows frames</u> may be accepted in some circumstances depending on the <u>section profile</u> , quality and style <del>of the uPVC</del> . This should be clearly detailed on submitted drawings and agreed by the Local Planning Authority. <del>uPVC</del> <u>‘Modern’ window materials</u> may not be appropriate....”
Black Mountain Conservation	External detailing, ii. Reiteration of the need for wildlife corridors in close board fencing.	This is addressed in para 3.30 (now 3.39) but agree, to add additional text added in ii. Also paragraph 3.53 (now 3.66)	Add text to last sentence in ii. Landscape schemes: <u>“..planting/hedging and also include sufficient 13x13cm gaps for hedgehogs”</u>  Reference to wildlife corridors inserted into para 3.53 (no 3.66): <u>“...wider rural landscape, including consideration of wildlife corridors, will be ....”</u>
Cwmpas Co op	No. Where consideration is given for traditional rural buildings being converted into affordable housing, it is unclear as to whether there is an expectation that the affordable housing is designed to comply with Welsh Government Development Quality Requirements (WDQR). Other relevant SPG suggests that such compliance on affordable housing is mandatory whilst consideration is needed	In order to be defined as affordable dwellings the buildings must comply with WDQR. The requirement is set out within Planning Policy Wales 11 <i>‘All affordable housing, including that provided through planning obligations and planning conditions, must meet the Welsh Government’s development quality standards (4.2.29).</i>	Redraft para 3.15 (now para 3.23): <del>“Local</del> <u>The requirement for affordable need for housing for local need and affordable housing</u> in a locality must be proven by reference to <u>the</u> latest local Housing Market/Needs Assessments and the prior opinion of the Director of Regeneration and Housing must also be sought. Any accommodation provided through a conversion scheme <u>must meet the Welsh Government’s Welsh Development Quality Requirements (WDQR), standards and remain affordable in perpetuity. Any such proposal must also be designed to meet the</u>



	as to whether such compliance is achievable for affordable on such buildings given the inherent nature of those buildings and the requirements outlined in the consultation draft SPG.		<u>specific</u> needs identified and be of an appropriate scale.”
<b>6. Does the draft SPG provide clear guidance to applicants/developers in relation to Green Infrastructure, biodiversity, external lighting, car parking etc?</b>			
Black Mountain Conservation	No. Light only appears as a mention in 3.32, in as much as ancillary works should not affect the character, and then in the appendices with regard to lightspill, and in the appendices with reference to a lighting strategy. It might be worth having some examples to highlight what would be acceptable. e.g., solar powered LED PIR lights which have a maximum output of Xwatts, to assist night-time access. Car parking is well mentioned, as is access. Green infrastructure is also limited to some vague points in the placemaking table.	Agreed. Light spill is a key consideration in the rural landscape both for the tranquil character and for ecology.	Add further guidance on lighting. Para’s added to section 3 and within Table in Section 4, windows viii Lightspill; .and features and services viii External Lighting.
Cwmpas Co op	Yes	Noted	No change
<b>7. In addition to any comments made in relation to Questions 1-6 above, please provide any further comments on how you consider the SPG could be improved and/or amended</b>			
Black Mountain Conservation	Several proofing errors throughout- a handful illustrated below. p12 3.1, line 6-7 - "context of the surrounding of the surrounding landscape" p14 3.8 line 5 of main text - "one [of] the proposed uses" p15 3.15 line 2 reference to [the] latest	Noted	Corrections will be made to the final version of the document in terms of necessary grammatical and spelling amendments.

	<p>p16 3.16 iv because of [a] lack of ...or... [due to] lack of</p> <p>p17 3.20 last line- does not[,] for example</p> <p>p28- table heading 'Existing Openings' typo.</p> <p>3.26 - excellent.</p>		
	<p>There is no mention of the need to use traditional materials and the impact that using cement based or modern mortars will have on, not just the integrity of the existing materials, but the aesthetic of the buildings themselves. No mention of traditional surface finishes- harling, render, limewash.</p>	<p>Where buildings or structures are listed or scheduled then the use of appropriate traditional materials can be required to safeguard the character and integrity of the designated heritage asset.</p> <p>Where buildings and structures are not designated assets then there is no planning mechanism to require the use of traditional materials whilst this is clearly desirable. Therefore encouragement and support can be added to the document in the same manner as the adopted Placemaking Guidance for the Gower AoNB.</p>	<p>Add new paragraph 3.35:  <u>“A key policy test is not to prejudice the original character of the building proposed for conversion. This will include identification of existing external traditional materials and how these relate to the rural setting. It is expected that the proposed finishes will include traditional materials appropriate to the nature of the rural building character and setting.”</u></p>
	<p>Again, mention needs to be made to TAN 24 and to the fact that many farm enclosures are entirely/ curtilage listed, and it isn't just the main building (so many owners do not know this).</p>	<p>Agreed – see response to Q1</p>	<p>Text added to renumbered paras as set out above.</p>
	<p>Where consideration is being given so thoroughly to historic/ traditional character, recommendation of an impact statement (in line with heritage, but from a parallel perspective) could be made.</p>	<p>Whilst a Heritage Impact Assessment is a validation requirement for a Listed Building, it is not required for non designated heritage assets. Clearly it is</p>	<p>Add text to ‘Appendix B Information Required in Support of a Planning Application’ Design and Access Statement rows as follows:</p>

		<p>important to understand the building or structure proposed for conversion but a HIA cannot be insisted upon.</p>	<p><u>“It is important to demonstrate an understanding of the character and setting of all buildings and structures proposed for conversion.</u>  <u>This is best done in a supporting document that mirrors the guidance set by Cadw for Heritage Impact Assessments identifying the significance in terms of:</u></p> <ul style="list-style-type: none"> <li>• <u>Evidential value</u></li> <li>• <u>Historic value</u></li> <li>• <u>Aesthetic Value</u></li> <li>• <u>Communal Value</u></li> </ul> <p><u>Whilst this is not a validation requirement it will support your proposals and should result in a better legacy.”</u></p>
	<p>No mention of insulation anywhere- again, this needs to reflect the requirement of most traditional buildings to breathe. Signposting to WTBF or local suppliers (Celtic Sustainables/ Ty Mawr) for LABC approved breathable systems and for contractors/ consultants who are QUALIFIED and ACCREDITED (i.e., SAP heritage NVQs, IHBC, Conservation accredited) to work in this area.</p>	<p>Agreed, most buildings proposed for residential conversion will require insulation to meet Building Regulation requirements.</p> <p>Where buildings or structures are listed then the use of appropriate breathable insulation can be required to safeguard the character and integrity of the designated heritage asset. However for undesignated heritage assets this cannot be insisted upon although it is best practice. Furthermore generally insulation should be internal to maintain the external character.</p>	<p>Add paragraph 3.36 as follows:</p> <p><u>“Most buildings or structures proposed for residential conversion will require insulation to meet Building Regulation requirements. It is expected that if insulation is required then this is internal to maintain the external character of walls. Where roof insulation is required this should be within the roof structure to maintain the existing roof levels. It is best practice is to use breathable insulation for the health of the building and occupants.”</u></p>
	<p>If the visual amenity of the area is not to be compromised (which this document stresses throughout), there needs to be an</p>	<p>The use of appropriate materials is a consideration in the acceptability of a conversion proposal.</p>	<p>Add new paragraph 3.35 as follows:  <u>“A key policy test is not to prejudice the original character of the building proposed for conversion. This</u></p>

	<p>understanding that that begins with some understanding of conservation principles and a grasp of how traditional buildings were constructed. To focus on every aspect but the suitability of the materials used in the conversion is to undermine the end result.</p>		<p><u>will include identification of existing traditional materials and it is expected that the proposed materials will be appropriate to the nature of the rural building character.”</u></p>
<p>Cwmpas Co op</p>	<p>It is considered a positive feature that the draft document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and Placemaking Charter. It is also positive that affordable housing and the mechanisms to retain such homes as affordable in perpetuity are included within the SPG as potential repurposed use for traditional rural buildings.</p>	<p>Noted</p>	<p>Noted</p>
<p>Cwmpas Co op</p>	<p>To develop the consideration that the SPG makes in terms of affordable housing, Cwmpas believes that an explicit statement in the SPG around the role and opportunity presented by community led affordable housing would be beneficial, a positive addition to the SPG and importantly, it would be in with the spirit of a community based response to breathing new life into traditional rural buildings whilst meeting defined local housing needs. Furthermore, in terms of defining community led housing and the differing forms it can take, community led affordable housing can be</p>	<p>The SPG reflects national policy with regard to both the definition of affordable housing and the role that converted rural buildings can play in the delivery of affordable housing.</p> <p>The SPG links to TAN 6 which states possible methods of delivering affordable housing in rural areas include community land trusts.</p>	<p>Amend text in original para 3.15 (now 3.23) to clarify WDQR requirements:  3.19 <del>Local</del> <u>The requirement for affordable need for housing for local need and affordable housing</u> in a locality must be proven by reference to <u>the latest local Housing Market/Needs Assessments</u> and the prior opinion of the Director of Regeneration and Housing must also be sought. Any accommodation provided through a conversion scheme <u>must meet the Welsh Government’s Welsh Development Quality Requirements development quality (WDQR), standards should and remain affordable in perpetuity. Any such proposal must also be designed to meet the</u></p>

	<p>delivered by range of different development agents, including but not limited to Registered Social Landlords.</p> <p>In making these comments and suggestions to include explicit reference to community led housing in the SPG, there is direct integration and correlation with the essence of national planning policy as contained within PPW Sustainable Placemaking Outcomes in terms of social, environmental, economic and cultural well-being thus:</p> <ul style="list-style-type: none"><li>- Creating and Sustaining Communities – community led housing promotes health and well-being and globally responsible Wales principles in the WBFGA legislation and makes a very direct and clear link between housing development in a community and meeting the housing needs of that community whilst allowing that community genuine input into the development process. Furthermore, the functionality of community led housing for example in terms of the sense of community, shared spaces and facilities, and social interactions is demonstrative of the essence of creating cohesive communities;</li><li>- Facilitating Accessible and Healthy Environments – for example, a key design principle of community led housing is to reduce dependence on private modes of transport and to encourage active modes of travel within the sustainable transport</li></ul>		<p><u>specific</u> needs identified and be of an appropriate scale.</p>
--	---	--	---

	<p>hierarchy. Furthermore, community led housing is a community facility or asset as it is the delivery of affordable housing in perpetuity by the community and for the community;</p> <ul style="list-style-type: none"><li>- Maximising Environmental Protection and Limiting Environmental Impact – community led housing addresses sustainability in its broadest sense of social, environmental, economic and cultural sustainability by creating viable and sustainable places through for example shared facilities</li><li>- Making Best Use of Resources – community led housing will often look to develop through repurposing existing buildings or on underused land where perhaps it is not viable for a private developer or RSL to develop new affordable housing.</li></ul> <p>Finally, it is considered that a direct reference to community led housing in the SPG document will address and removes some of the potential barriers and challenges faced in the delivery of such forms of affordable housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing in SPG</p>		
--	--	--	--

	<p>bridges the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognises the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.</p> <p>NOTE: By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.</p>		
<p>Glamorgan Gwent Archaeological Trust (GGAT)</p>	<p>Thank you for consulting us regarding this draft document.</p> <p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic</p>	<p>Comment noted.</p>	<p>No change as a result of comments, but note the document has been amended with increased reference to TAN 24.</p>

environment, through our advisory teams. Swansea has adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.

The document identifies the background to the variety of rural buildings, and takes into account the historic environment and archaeological aspects, noting national and local Policy. It also acknowledges that some buildings are not listed or statutorily protected; these buildings and structures may be more at risk through unrecorded change.

It is recognised that rural buildings include but are not limited to agricultural buildings, and that the remains of rural industries often exist as both buried and upstanding remains, which may require mitigation as part of the development proposals. There may also be buried archaeological remains in the immediate locations of some buildings, unrelated and of earlier date than the buildings themselves. It is recognised that recommending an appropriate level of building recording is suitable mitigation, and if necessary, archaeological mitigation prior to or as a condition of consent, should there be a likelihood of buried remains. Managing change in the historic environment is also informed by Cadw's suite of best practice guidance documents. The importance of



	<p>the historic environment and archaeological resource varies in type and small developments, including extensions, or work to listed or unlisted historic buildings, can have as significant an impact as large developments.</p> <p>We note that your authority has no SPG for the historic environment; best practice would be to have an SPG for the historic environment, to include Archaeologically Sensitive Areas; SPGs have been produced for other local authorities in SE Wales. This ensures that the historic environment is to the forefront at a strategic level and that subsequent mitigation at detailed level has an accepted base.</p> <p>Proposed changes which will impact the historic environment can be mitigated in a timely manner by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may lead to risk are unmitigated change from both physical and visual means.</p> <p>All historic environment and archaeological work, including that undertaken to assess change in areas and individual buildings or structures which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered</p>		
--	---	--	--

	<p>Institute for Archaeologists  <a href="https://www.archaeologists.net/codes/cifa">https://www.archaeologists.net/codes/cifa</a></p> <p>It is our policy to recommend that all archaeological and historic environment mitigation work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCfA level member Looking for an archaeologist?   Chartered Institute for Archaeologists. These professional organisations are accredited, competent and experienced and work to current professional Standards.</p> <p>If you have any questions or require further advice on this matter, please do not hesitate to contact us</p>		
Nature Conservation Team, Swansea Council	Para 3.49: amend 'and breeding birds' to 'and other breeding birds'	Agree	Text amended in para 3.49 (now 3.62)
Nature Conservation Team, Swansea Council	Para 3.51: change 'considered' to 'consulted'	Text will be amended	Para 3.51 (now 3.64) text has been amended to refer to SPG being a material consideration: " <b>..Biodiversity and Development SPG <u>will</u> should also be <u>a material consideration.</u> considered..."</b>
Nature Conservation Team, Swansea Council	Para 3.52: amend 'and nest boxes' to 'and bird nesting boxes'	Agree	Para 3.52 (now 3.65) amended: "provision of bat and <u>bird nesting</u> boxes"
Nature Conservation Team,	Table in section 4: viii. Lightspill. Amend tranquillity and biodiversity' to: 'tranquillity and	Agree to changes as suggested	viii. Lightspill: Paragraph amended as requested:

<p>Swansea Council</p>	<p>biodiversity and may affect nocturnal animals and this will be highlighted in the PEA re protection of dark corridors for bats if relevant’.</p> <p>ii. Chimneys – typo.</p> <p>ii. Landscape Schemes: Add following text after ‘wider landscapes’. ‘...wider landscape setting and should also include planting for pollinators using native species of local or Welsh provenance’.</p> <p>AND also add following text after ‘planting/hedging’ ‘...planting/hedging and also include sufficient 13 x 13 cm gaps for hedgehogs’</p>		<p><u>“...impacts on tranquillity and biodiversity and may affect nocturnal animals and this will be highlighted in the PEA re: protection of dark corridors for bats if relevant.”</u></p> <p>ii. typo amended</p> <p>ii. Landscape schemes: text amended as suggested: <u>“...landscape setting and should also include planting for pollinators using native species of local or Welsh provenance”.</u></p> <p>Amend as suggested: <u>“...sufficient screen planting/hedging and also include sufficient 13x13cm gaps for hedgehogs.”</u></p>
<p>Nature Conservation Team, Swansea Council</p>	<p><b>APPENDIX D</b> Ecological Reports: Amend text in applicability box to: ‘All proposals for conversions. The advice should be sought from the Council's Ecologist before....’</p> <p>AND amend bullet point in content box to read: ‘A preliminary ecological appraisal or PEA should be undertaken by a suitably qualified ecologist to identify....’</p>	<p>Agree, amend as suggested</p>	<p>Appendix D (now B) amended as requested: <u>“All proposals for conversions. The Advice should be sought from the- Council’s eEcologist <del>should be sought</del> before commencing any preparation work.”</u></p> <p><u>“A preliminary-ecological appraisal or PEA should be undertaken by a suitably qualified ecologist to identify the likely presence of protected species and the need for further detailed surveys.”</u></p>
<p>Nature Conservation Team, Swansea Council</p>	<p>APPENDIX D Arboricultural reports: Add text in content box to read: ‘...on submitted plans in addition, any mature on-site trees which may require works will be subject to a Preliminary Roost Assessment for bats prior to works being undertaken.</p>	<p>Agree, amend as suggested</p>	<p>Appendix D (now B) amended as suggested: <u>“...on submitted plans in addition, any mature on-site trees which may require works will be subject to a Preliminary Roost Assessment for bats prior to works being undertaken.”</u></p>

<p>Nature Conservation Team, Swansea Council</p>	<p>APPENDIX D Lighting Strategy: Amend text in applicability box to read: 'All development within the AONB and also anywhere within the County where there is local evidence of bats etc will require a strategy...' Amend text in content box to read: 'A Lighting Assessment and Plan (Lighting Strategy) will be required for all developments within the AONB and everywhere within the County there is local evidence of bats etc. The lighting strategy must follow guidance in the latest publication Bats and Artificial lighting at night published August 2023 and available from Bat Conservation Trust.</p>	<p>Agree, amend as suggested</p>	<p>Appendix D (now B) amended as suggested:  <u>"All development within the AONB, and anywhere within the County where there is local evidence of bats etc, will require a strategy</u> <del>SOME developments elsewhere in the County will require a strategy</del> <u>-detailing the location and type of external lighting to be used."</u>   <u>"...developments within the AONB and everywhere within the County where there is local evidence of bats etc. The Lighting Strategy must follow guidance in the latest publication Bats and Artificial Lighting At Night, Aug 2023 and available from the Bat Conservation Trust. some developments elsewhere in the County.</u> <del>The Plan should..."</del></p>
--	---	----------------------------------	--

## Appendix A: Comments Received

### Consultation on Draft Supplementary Planning Guidance: Conversion of Traditional Rural Buildings

Swansea Council is the data controller for the personal information you provide on this form. Your information will be used in the exercise of our official authority and will not be used for any other purpose. We will not share your data with third parties unless we are required or permitted to do so by law.

Data protection law describes the legal basis for our processing your data as necessary for the performance of a public task. For further information about how Swansea Council uses your personal data, including your rights as a data subject, please see our corporate [privacy notice](#) on our website.

Please read the SPG document and answer the following questions to submit your views. Where your comment made is in relation to a specific paragraph, please state the paragraph number.

#### Section 1 - General questions

**1. Do you think the draft SPG is sufficiently clear in terms of what are the key relevant LDP policies that apply in relation to proposals for the conversion of traditional rural buildings?**

No

**If no, please explain why**

There is no mention of TAN 24. By nature of the fact that these are 'traditional' rural buildings, many are likely to belong to listed buildings or be in the vicinity of scheduled monuments. No mention has been given in the section on policy to the historic environment, the need to consider setting, the impacts of conversion on listed buildings, or the policies which apply if you are thinking of converting a building in the curtilage of a listed property. In fact, TAN 24 isn't mentioned at any point in the whole document.

**2. Do you consider the draft SPG will assist in resolving whether a building is defined as 'traditional' for the purpose of a planning application?**

No

<p><b>If no, please explain why</b></p>	<p>"often stone but in some instances can include masonry and timber frames" - masonry is considered to be stone- it might be better phrased as often stone, but occasionally brick or timber frame. Metal structures would be more likely found in mid to late nineteenth century buildings and onwards, i.e. when steel was first commonly used, with the occasional use of cast and wrought iron, for columns and roof trusses respectively, or for cladding and rooves (corrugated). Metal in older buildings is not accurate. Traditional construction is generally deemed to be pre-1919, in rural areas of Wales it is considered to extend to pre-war (1930s) buildings.</p>
<p><b>3. Do you consider further detailed guidance is needed in relation to the factors to be considered when deciding whether a building is traditional or not, such as in relation to materials; age; structure and form; overall appearance; etc.?</b></p>	<p>Yes</p>
<p><b>If yes, please suggest what guidance you consider would be useful</b></p>	<p>Repeated from Q2.</p> <p>"often stone but in some instances can include masonry and timber frames" - masonry is considered to be stone- it might be better phrased as often stone, but occasionally brick or timber frame. Metal structures would be more likely found in mid to late nineteenth century buildings and onwards, i.e. when steel was first commonly used, with the occasional use of cast and wrought iron, for columns and roof trusses respectively, or for cladding and rooves (corrugated). Metal in older buildings is not accurate. Traditional construction is generally deemed to be pre-1919, in rural areas of Wales it is considered to extend to pre-war (1930s) buildings.</p> <p>Additionally, some pictorial examples of traditional rural buildings from Swansea should be included. Powys SPG for development based on their town character appraisals gives clear examples of what the local design characteristics are. This could be provided as a gazetter appendix, with, e.g., windows- size, material, number; doors- likewise; render types- e.g., harled, stucco; setting. Refer to the Tywi Centre or the Welsh Traditional</p>

	Building Forum so that people know where to go to extra help and support.
<b>4. Does the SPG provide clear guidance on the type of buildings that can be converted, especially considering their location, form and structure?</b>	Yes
<b>If no, please suggest what guidance you consider would be useful</b>	
<b>5. Does the draft SPG provide clear guidance in relation to placemaking and design principles for any proposed conversions of traditional rural buildings to applicants/developers in and explain what is expected from applicants?</b>	No
<b>If No, please suggest what amendments could be made to make it clearer</b>	<p>Photos/ images on p18 - maybe emphasise that features which may detract from the traditional aesthetics of the building should be restricted to perspectives which are not seen. Requirement of ZTV mapping and imaging to establish minimum impact proposals. Images show a large number of roof lights, but this could be achieved more sensitively - tinted glass to blend the windows into the slate, or on a different aspect, or in line with historic warehouses, ridge line glazing to allow maximum light penetration with minimal roof interference. I don't believe that the images used represent the text, particularly with reference to the windows and openings.</p> <p>3.33 - perhaps certain of the permitted development rights should be withdrawn, rather than all of them? There are certain aspects of PD rights which wouldn't cause impact just because the buildings have been converted.</p> <p>3.34 I think a balance needs to be struck in rural areas where provision needs to be enhanced for economic or residential reasons, between the need for that provision, the requirement for energy and services to be carbon off-setting, and for measures to mitigate the visual impact of e.g., ASHP. The economic and environmental benefits of building reuse as opposed to new development are well documented. The impacts on our traditional building stock from climate change is also thoroughly considered,</p>

and so buildings which are able to mitigate these effects and contribute to more environmental construction should be considered, even if there is associated negative impact from certain aspects.

3.36 Again, does a ruined (and likely to become more ruinous, if not entirely derelict) agricultural building have better visual amenity than a ruined ag. building which has been sensitively rebuilt and reflects the original character of the area. IF a building can be rebuilt, and there is evidence of its original construction, then surely reconstruction and reuse offers better community value and landscape aesthetics than a building left to fall down because it is economically unviable to repair and maintain a building with no use? Alternatively, approaches as per the Landmark Trust at Astley Castle could be used, whereby the original building is stabilised and the development is built within the space. Creative approaches should not be ruled out as a matter of principle, when the alternative is to do nothing. Placemaking checklist- archaeology - might be required for more than just the groundworks. Raising awareness of apotropaic marks (common in farm buildings), the need for maintaining patina and carpenters' marks etc. on original structural timbers. I would recommend that even if the building isn't listed, a site visit from an archaeologist or heritage consultant is a stipulation to help applicants ensure that the placemaking aspects of the application are met and that the significance of the building isn't compromised through a lack of understanding.

P28- depth of reveal - should also be noted that in older traditional (particularly rural) buildings, reveals were flared and rounded.

Windows, v. Is it possible to open this up to aluminium windows, which are more flexible in terms of narrow glazing bars and don't have the same impact as UPVC. They are also minimal maintenance and greater longevity, so are a compromise.

External detailing, ii. Reiteration of the need for wildlife corridors in close board fencing.



<p><b>6. Does the draft SPG provide clear guidance to applicants/developers in relation to Green Infrastructure, biodiversity, external lighting, car parking etc?</b></p>	<p>No</p>
<p><b>If No, please suggest what amendments could be made to make it clearer</b></p>	<p>Light only appears as a mention in 3.32, in as much as ancillary works should not affect the character, and then in the appendices with regard to lightspill, and in the appendices with reference to a lighting strategy. It might be worth having some examples to highlight what would be acceptable. e.g., solar powered LED PIR lights which have a maximum output of Xwatts, to assist night-time access. Car parking is well mentioned, as is access. Green infrastructure is also limited to some vague points in the placemaking table.</p>
<p><b>7. In addition to any comments made in relation to Questions 1-6 above, please provide any further comments on how you consider the SPG could be improved and/or amended</b></p>	<p>Several proofing errors throughout- a handful illustrated below.  p12 3.1, line 6-7 - "context of the surrounding of the surrounding landscape"  p14 3.8 line 5 of main text - "one [of] the proposed uses"  p15 3.15 line 2 reference to [the] latest  p16 3.16 iv because of [a] lack of ...or... [due to] lack of  p17 3.20 last line- does not[, ] for example  p28- table heading 'Existing Openings' typo.</p> <p>3.26 - excellent.</p> <p>There is no mention of the need to use traditional materials and the impact that using cement based or modern mortars will have on, not just the integrity of the existing materials, but the aesthetic of the buildings themselves. No mention of traditional surface finishes- harling, render, limewash. Again, mention needs to be made to TAN 24 and to the fact that many farm enclosures are entirely/ curtilage listed, and it isn't just the main building (so many owners do not know this). Where consideration is being given so thoroughly to historic/ traditional character, recommendation of an impact statement (in line with heritage, but from a parallel perspective) could be made. No mention of insulation anywhere- again, this needs to reflect the requirement of most traditional buildings to breathe. Signposting to WTBF or</p>

	<p>local suppliers (Celtic Sustainable/ Ty Mawr) for LABC approved breathable systems and for contractors/ consultants who are QUALIFIED and ACCREDITED (i.e., SAP heritage NVQs, IHBC, Conservation accredited) to work in this area. If the visual amenity of the area is not to be compromised (which this document stresses throughout), there needs to be an understanding that that begins with some understanding of conservation principles and a grasp of how traditional buildings were constructed. To focus on every aspect but the suitability of the materials used in the conversion is to undermine the end result.</p>
<p>Please provide your name and email address in order to enable a confirmation receipt of your comments to be sent.</p>	
<p>Comments will be included within a published consultation report. Personal details will not be published.</p>	
<p><b>Name</b></p>	<p>██████████</p>
<p><b>Email</b></p>	<p>hello@blackmountainconservation.co.uk</p>
<p><b>I am completing this form</b></p>	<p>As an agent (e.g. planning consultant or architect)</p>
<p><b>If you are completing the form on behalf of an organisation, please name the organisation</b></p>	

## Consultation on Draft Supplementary Planning Guidance: Conversion of Traditional Rural Buildings

Swansea Council is the data controller for the personal information you provide on this form. Your information will be used in the exercise of our official authority and will not be used for any other purpose. We will not share your data with third parties unless we are required or permitted to do so by law.

Data protection law describes the legal basis for our processing your data as necessary for the performance of a public task. For further information about how Swansea Council uses your personal data, including your rights as a data subject, please see our corporate [privacy notice](#) on our website.

Please read the SPG document and answer the following questions to submit your views. Where your comment made is in relation to a specific paragraph, please state the paragraph number.

### Section 1 - General questions

**1. Do you think the draft SPG is sufficiently clear in terms of what are the key relevant LDP policies that apply in relation to proposals for the conversion of traditional rural buildings?**

Yes

**If no, please explain why**

**2. Do you consider the draft SPG will assist in resolving whether a building is defined as 'traditional' for the purpose of a planning application?**

Yes

**If no, please explain why**

**3. Do you consider further detailed guidance is needed in relation to the factors to be considered when deciding whether a building is traditional or not, such as in relation to materials; age; structure and form; overall appearance; etc.?**

No

**If yes, please suggest what guidance you consider would be useful**

**4. Does the SPG provide clear guidance on the type of buildings that can be converted, especially considering their location, form and structure?**

Yes

<p><b>If no, please suggest what guidance you consider would be useful</b></p>	
<p><b>5. Does the draft SPG provide clear guidance in relation to placemaking and design principles for any proposed conversions of traditional rural buildings to applicants/developers in and explain what is expected from applicants?</b></p>	<p>No</p>
<p><b>If No, please suggest what amendments could be made to make it clearer</b></p>	<p>Where consideration is given for traditional rural buildings being converted into affordable housing, it is unclear as to whether there is an expectation that the affordable housing is designed to comply with Welsh Government Development Quality Requirements (WDQR). Other relevant SPG suggests that such compliance on affordable housing is mandatory whilst consideration is needed as to whether such compliance is achievable for affordable on such buildings given the inherent nature of those buildings and the requirements outlined in the consultation draft SPG.</p>
<p><b>6. Does the draft SPG provide clear guidance to applicants/developers in relation to Green Infrastructure, biodiversity, external lighting, car parking etc?</b></p>	<p>Yes</p>
<p><b>If No, please suggest what amendments could be made to make it clearer</b></p>	
<p><b>7. In addition to any comments made in relation to Questions 1-6 above, please provide any further comments on how you consider the SPG could be improved and/or amended</b></p>	<p>It is considered a positive feature that the draft document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and Placemaking Charter. It is also positive that affordable housing and the mechanisms to retain such homes as affordable in perpetuity are included within the SPG as potential repurposed use for traditional rural buildings.</p> <p>To develop the consideration that the SPG makes in terms of affordable housing, Cwmpas believes that an explicit statement in the SPG around the role and opportunity presented by</p>

community led affordable housing would be beneficial, a positive addition to the SPG and importantly, it would be in with the spirit of a community based response to breathing new life into traditional rural buildings whilst meeting defined local housing needs. Furthermore, in terms of defining community led housing and the differing forms it can take, community led affordable housing can be delivered by range of different development agents, including but not limited to Registered Social Landlords.

In making these comments and suggestions to include explicit reference to community led housing in the SPG, there is direct integration and correlation with the essence of national planning policy as contained within PPW Sustainable Placemaking Outcomes in terms of social, environmental, economic and cultural well-being thus:

- Creating and Sustaining Communities - community led housing promotes health and well-being and globally responsible Wales principles in the WBFGA legislation and makes a very direct and clear link between housing development in a community and meeting the housing needs of that community whilst allowing that community genuine input into the development process. Furthermore, the functionality of community led housing for example in terms of the sense of community, shared spaces and facilities, and social interactions is demonstrative of the essence of creating cohesive communities;

- Facilitating Accessible and Healthy Environments - for example, a key design principle of community led housing is to reduce dependence on private modes of transport and to encourage active modes of travel within the sustainable transport hierarchy. Furthermore, community led housing is a community facility or asset as it is the delivery of affordable housing in perpetuity by the community and for the community;

- Maximising Environmental Protection and Limiting Environmental Impact - community led housing addresses sustainability in its broadest sense of social, environmental, economic and cultural sustainability by creating viable and sustainable places through for example shared facilities

- Making Best Use of Resources - community led housing will often look to develop through repurposing existing buildings or on underused land where perhaps it is not viable for a private developer or RSL to develop new affordable housing. Finally, it is considered that a direct reference to community led housing in the SPG document will address and removes some of the potential barriers and challenges faced in the delivery of such forms of affordable housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMAS and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing in SPG bridges the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognises the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

NOTE: By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.

Please provide your name and email address in order to enable a confirmation receipt of your comments to be sent.

Comments will be included within a published consultation report. Personal details will not be published.

**Name**

██████████

<b>Email</b>	jonathan.hughes@cwmpas.coop
<b>I am completing this form</b>	On behalf of an organisation
<b>If you are completing the form on behalf of an organisation, please name the organisation</b>	Cwmpas

Our ref: SWASPG/JBHD

STEWARDSHIP

Planning and City Regeneration  
Civic Centre  
Oystermouth Road  
Swansea  
SA1 3SN

4<sup>th</sup> September 2023

Dear Sir/Madam

**Re: Consultation on Draft Supplementary Planning Guidance (SPG):  
Conversion of Traditional Rural Buildings.**

Thank you for consulting us regarding this draft document.

You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our advisory teams. Swansea has adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.

The document identifies the background to the variety of rural buildings, and takes into account the historic environment and archaeological aspects, noting national and local Policy. It also acknowledges that some buildings are not listed or statutorily protected; these buildings and structures may be more at risk through unrecorded change.

It is recognised that rural buildings include but are not limited to agricultural buildings, and that the remains of rural industries often exist as both buried and upstanding remains, which may require mitigation as part of the development proposals. There may also be buried archaeological remains in the immediate locations of some buildings, unrelated and of earlier date than the buildings themselves. It is recognised that recommending an appropriate level of building recording is suitable mitigation, and if necessary, archaeological mitigation prior to or as a condition of consent, should there be a likelihood of buried remains. Managing change in the historic environment is also informed by Cadw's suite of best practice guidance documents. The importance of the historic environment and archaeological resource varies in type and small developments, including extensions, or work to listed or unlisted historic buildings, can have as significant an impact as large developments.

We note that your authority has no SPG for the historic environment; best practice would be to have an SPG for the historic environment, to include Archaeologically Sensitive Areas; SPGs have been produced for other local authorities in SE Wales. This ensures that the historic environment is to the forefront at a strategic level and that subsequent mitigation at detailed level has an accepted base.

Proposed changes which will impact the historic environment can be mitigated in a timely manner by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may lead to risk are unmitigated change from both physical and visual means.



Glamorgan-Gwent  
Archaeological Trust  
Limited  
Yrddinleolaeth  
Archaeological  
Heritage-Gwent  
SA12 Business Centre  
Senny Ffwrds  
Bryn Stwily Park  
Park Terrace  
SA12 7BR  
Tel: (01792) 651208  
www.gat.org.uk

Registered Office: Above  
Registered in Wales  
No. 122876

A company limited by guarantee  
without share capital

Registered charity  
No. 505609



All historic environment and archaeological work, including that undertaken to assess change in areas and individual buildings or structures which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa>.

It is our policy to recommend that all archaeological and historic environment mitigation work is undertaken either by a Registered Organisation (RO) with the CIFA or by a MCIFA level member [Looking for an archaeologist? | Chartered Institute for Archaeologists](#). These professional organisations are accredited, competent and experienced and work to current professional Standards.

If you have any questions or require further advice on this matter, please do not hesitate to contact us.

Yours faithfully

  
Stewardship Officer/Deputy Chief Executive Officer



