

# CITY AND COUNTY OF SWANSEA

## NOTICE OF MEETING

You are invited to attend a Special Meeting of the

## PLANNING COMMITTEE

**At:** Council Chamber, Guildhall, Swansea

**On:** Thursday, 4 June 2015

**Time:** 10.00 am

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## AGENDA

	Page No.
1 Apologies for Absence.	
2 Disclosures of Personal and Prejudicial Interests.	1 - 2
3 To consider Local Development Plan Allocations and Petitions.	3 - 213



**Patrick Arran**  
**Head of Legal, Democratic Services & Procurement**  
**28 May 2015**

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**Contact: Democratic Services – 01792 636923**

## PLANNING COMMITTEE (12)

### Labour Councillors: 8

John C Bayliss ( <b>Vice-Chair</b> )	Andrea S Lewis
David W Cole	Paul Lloyd ( <b>Chair</b> )
Ann M Cook	Des WW Thomas
Erika T Kirchner	T Mike White

### Liberal Democrat Councillors: 2

Mary H Jones	Cheryl L Philpott
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### Independent Councillors: 1

Ioan M Richard	
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### Conservative Councillor: 1

Anthony C S Colburn	
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**Note: Quorum for this Committee is 6 Councillors**

## Disclosures of Interest

To receive Disclosures of Interest from Councillors and Officers

### Councillors

**Councillors Interests are made** in accordance with the provisions of the Code of Conduct adopted by the City and County of Swansea. You must disclose orally to the meeting the existence and nature of that interest.

**NOTE:** You are requested to identify the Agenda Item / Minute No. / Planning Application No. and Subject Matter to which that interest relates and to enter all declared interests on the sheet provided for that purpose at the meeting.

1. If you have a **Personal Interest** as set out in **Paragraph 10** of the Code, you **MAY STAY, SPEAK AND VOTE** unless it is also a Prejudicial Interest.
2. If you have a Personal Interest which is also a **Prejudicial Interest** as set out in **Paragraph 12** of the Code, then subject to point 3 below, you **MUST WITHDRAW** from the meeting (unless you have obtained a dispensation from the Authority's Standards Committee)
3. Where you have a Prejudicial Interest you may attend the meeting but only for the purpose of making representations, answering questions or giving evidence relating to the business, **provided** that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise. In such a case, you **must withdraw from the meeting immediately after the period for making representations, answering questions, or giving evidence relating to the business has ended**, and in any event before further consideration of the business begins, whether or not the public are allowed to remain in attendance for such consideration (**Paragraph 14** of the Code).
4. Where you have agreement from the Monitoring Officer that the information relating to your Personal Interest is **sensitive information**, as set out in **Paragraph 16** of the Code of Conduct, your obligation to disclose such information is replaced with an obligation to disclose the existence of a personal interest and to confirm that the Monitoring Officer has agreed that the nature of such personal interest is sensitive information.
5. If you are relying on a **grant of a dispensation** by the Standards Committee, you must, before the matter is under consideration:
  - i) Disclose orally both the interest concerned and the existence of the dispensation; and
  - ii) Before or immediately after the close of the meeting give written notification to the Authority containing:

- a) Details of the prejudicial interest;
- b) Details of the business to which the prejudicial interest relates;
- c) Details of, and the date on which, the dispensation was granted; and
- d) Your signature

## **Officers**

### **Financial Interests**

1. If an Officer has a financial interest in any matter which arises for decision at any meeting to which the Officer is reporting or at which the Officer is in attendance involving any member of the Council and /or any third party the Officer shall declare an interest in that matter and take no part in the consideration or determination of the matter and shall withdraw from the meeting while that matter is considered. Any such declaration made in a meeting of a constitutional body shall be recorded in the minutes of that meeting. No Officer shall make a report to a meeting for a decision to be made on any matter in which s/he has a financial interest.
2. A "financial interest" is defined as any interest affecting the financial position of the Officer, either to his/her benefit or to his/her detriment. It also includes an interest on the same basis for any member of the Officers family or a close friend and any company firm or business from which an Officer or a member of his/her family receives any remuneration. There is no financial interest for an Officer where a decision on a report affects all of the Officers of the Council or all of the officers in a Department or Service.



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4	CO010	Land adj Titanium Road; Ystrad Road; Carmarthen Road and Swansea Road
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ITEM	SITE REF.	SITE LOCATION
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PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

<b>Reference</b>	<b>CO003</b>
<b>Name</b>	<b>The former Walkers Factory, Pontardulais Rd, Cadle</b>
<b>Description</b>	Former industrial building on eastern side of Pontarddulais Rd/Carmarthen Rd, south of the Pontarddulais Rd Retail Park. Level site elevated above adjoining dual carriageway includes a landmark Listed Building. Surrounded by residential properties and Fforestfach Retail Park to the west on the opposite side of the road, residential properties and Cadle School to the south and urban greenspace to the east.
<b>Size</b>	2 Ha
<b>Existing Land use</b>	Industrial & Storage
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

No representations received.

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

**LDP Draft Proposals Map Consultation: Summary of Representations**

No comments were received specifically regarding this site.

**Response to Representations**

No representations received.

PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: The site is suitably accessed.</p> <p><u>Local Highway Conditions</u>: There are congestion issues at the Pontardulais Road traffic signals.</p> <p><u>Accessibility</u>: There is a 10 min frequency service past the site.</p> <p><u>Wider Issues / Combined effect</u>: Issues at the Pontardulais Road traffic signal junction will need consideration. However, there is a current application under consideration which has been assessed as suitable.</p> <p><u>Transport Proposals</u>: None at present, other than general requirement to improve traffic flow in the area.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	Bat survey requested in connection with planning application. Ecological survey submitted – no constraints identified
CCS Environmental Health	No comments
CCS Education	<p><u>Cadle Primary</u>: Our aspiration has always been to bring the Early Years block, which is stand alone to the main school, into the main school building as a new extension. Whilst the site is capable of an extension, any sites in this area would require such an extension to the school.</p> <p><u>Bishop Gore Comprehensive</u>: All of the secondary schools in the West of Swansea are currently under review as part of the ongoing Secondary Stakeholder Forum. Whilst there is scope to extend the school, careful consideration needs to be given to the impact of not being able to extend the next nearest secondary i.e. Olchfa (see points under Olchfa). There are major concerns over access to the site, particularly as many pupils are transported by bus (costs could increase if some of these sites are brought forward and there is no infrastructure to support any increased vehicles to the site).</p>

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>Mature hedgerow at the southern boundary of the site, which should be retained for connectivity. The north-eastern boundary of the site lies adjacent to Cadle Heath.</p> <p>WFD moderate.</p> <p>Possible contamination from Historic use.</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

	<p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Gowerton Waste water treatment works capacity – Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	+1	n/a	+2	n/a	n/a	n/a	n/a	+1	0	n/a	+2	+1	+1	+1	n/a	?	+1	+2

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+	?	+	0	+	+	0	?	++	0	+/-	?	++	++	x	+	?	?	0	?	?



**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

<b>Reference</b>	<b>CO004</b>
<b>Name</b>	<b>Land adjacent and to rear of 114 Brithwen Road, Waunarlyydd</b>
<b>Description</b>	The application site is located on the edge of Waunarlyydd, to the rear of 'Greenways', 114 Brithwen Road. The majority of the site was formerly used as field for grazing whilst the part nearest the road used to form garden or 'barns'. The majority of this site lies within the defined urban settlement limit, appearing as 'white land' on the Proposals Map, but the remainder (about a third of the site to the eastern side) extends into land designated as Green Wedge in the adopted Unitary Development Plan for Swansea. This additional land is proposed to be incorporated within a revised settlement boundary and effectively increases the potential developable area to more than ten units
<b>Size</b>	0.412 Ha
<b>Existing Land use</b>	Former garden and grazing land within settlement and part open countryside
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



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### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

69 letters of objection were received which are summarised below:

- Green wedge
- Detrimental impact on private unadopted lane
- No mains sewerage system
- Subject to current planning application which has been delayed by Burry Inlet and Gowerton Sewerage Treatment Works issues
- Inappropriate site access
- Inadequate drainage/flood risk
- Adverse visual impact
- Adverse impact on habitat and wildlife
- Unacceptable precedent
- Disproportionate number of social housing in the local community
- Local schools are at capacity
- Adverse impact on character of community/village
- Encroachment on common land
- Adverse impact on noise and pollution
- Loss of green space
- Unacceptable strain on local resources
- Negative impact on lives of current residents

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### LDP Draft Proposals Map Consultation: Summary of Representations

3 further letters of objection were received which are summarised below:

- severe traffic congestion and poor road infrastructure
- Only limited green space in this village that the residents can access/children can play
- This section of land is very badly water logged
- Local services and facilities already oversubscribed

### Response to Representations

- Upon commencement of preparation of a new development plan (i.e. the LDP process currently underway) all existing policies and designations (e.g. green wedges) are subject of review. Green wedges unlike Green Belts are only temporary in nature and around 40% the new housing to be allocated in the LDP will have to be on land currently designated as green wedge, as there is insufficient land available within existing settlement boundaries to meet all future demand. Each site is looked at on its individual merits and does not set a precedent as all policy is being considered anew.
- The Highway Authority indicates that the site is suitably accessed but local road improvements to the site frontage will be required. This would be an integral part of any development proposal and is not an obstacle to development
- There is capacity at local English Primary and Secondary Comprehensive schools, although contribution to upgrading of facilities may be required. There is a County wide review of Welsh medium education provision and capacity will need to be expanded to meet future demand - it is not a constraint to development
- No significant ecological issues subject to retention of hedgerows and mitigation measures.
- The site is not common land or part of the urban greenspace system, although there is a right of way which crosses it
- There is a requirement for affordable housing across all parts of the County and there is clear demand in this locality with a Registered Social Landlord owning half the site.
- The site is not within a flood risk zone and any issues with surface water drainage would need to be addressed as part of any development proposals.
- Works are ongoing to upgrade the capacity of the drainage system and Gowerton STW. It is a requirement for Dwr Cymru as statutory undertaker to meet needs arising from LDP allocations and any current issues with the drainage system are not an obstacle to allocation of the site

## PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

- Any development would need to comply with the Council's design guidance and respect the scale and character of the existing adjoining development and the residential and visual amenities of adjoining occupiers
- The area is not a suitable area for children to play due to extensive dog fouling. It is private land and not an amenity area but a means of access to wider countryside to the south
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- Works are ongoing to upgrade the capacity of the drainage system and Gowerton STW. It is a requirement for Dwr Cymru as statutory undertaker to meet needs arising from LDP allocations and any current issues with the drainage system are not an obstacle to allocation of the site
- Any development would need to comply with the Council's design guidance and respect the scale and character of the existing adjoining development and the residential and visual amenities of adjoining occupiers
- The area is not a suitable area for children to play due to extensive dog fouling. It is private land and not an amenity area but a means of access to wider countryside to the south
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site is suitably accessed, but the road will need upgrading.</p> <p><u>Local Highway Conditions:</u> Local road improvements along the site frontage are necessary</p> <p><u>Accessibility:</u> There is a 10 min frequency service approximately 500m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Local road improvements are necessary. Currently an application is being considered for 11 houses.</p>

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	<p><u>Restrictions:</u> Local improvements required.</p> <p><u>Transport Proposals:</u> None at present, other than general requirement to improve traffic safety in the area.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p> <p>Western half of site owned by RSL -potential 100% affordable housing</p>
CCS Biodiversity	<p>The key recommendations are the retention of the eastern and southern hedges, reptile mitigation and timing of clearance to protect nesting birds. Reptiles are a protected species under the Wildlife and Countryside Act. A survey has been considered by the Countryside Council for Wales and the Department's ecologist who are satisfied that there should be no ecological issues, provided the mitigation proposed in the study is carried out. It is considered reasonable to require these mitigation measures by condition</p>
CCS Environmental Health	No comments
CCS Education	<p><u>Waunarlwydd Primary:</u> There is some surplus capacity; larger pupil numbers may require an expansion of the school. If families chose Welsh medium education there is no capacity within the nearest Welsh medium primary schools and expansion of existing schools will be difficult.</p> <p><u>Gowerton Comprehensive/YGG Gwyr:</u> Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YGG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

<b>External Stakeholder</b>	<b>Comments</b>
NRW	<p>In relation to the recent planning application the advice was:</p> <ul style="list-style-type: none"> <li>• CCW has NO OBJECTION to the HRA, and the proposed development subject to conditions.</li> <li>• EAW have requested DEFERRAL to ensure a suitable compensatory surface water removal scheme is agreed to allow the connection of new foul flows to the public main.</li> <li>• DCWW have OBJECTED and recommend REFUSAL because their recent surveys have confirmed there are localised capacity issues in the foul drainage network downstream of this particular development. It is understood that these objections would be removed if a suitable compensatory surface water removal scheme in the sub-catchment or wider catchment area were agreed.</li> </ul> <p>Accordingly, the LPA has considered this carefully, and is satisfied that sufficient drainage savings have been made elsewhere in the catchment area and recorded by the Local Planning Authority which would allow this particular development to be accommodated without detriment to the environment.</p> <p><u>Comments received from NRW on Draft Proposals Map:</u> Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>Possible BAP Habitat. Mature trees, scrub and grassland. Recommend Extended Phase 1 survey, prior to any work taking place. Consider use by bats species.</p>
Dwr Cymru	<p><u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

	<p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p>No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	+1	0	+1	0	?	+2	n/a	+1	0	n/a	n/a	n/a	+1	n/a	n/a	-1	0	+1	+1	n/a	?	?	+1

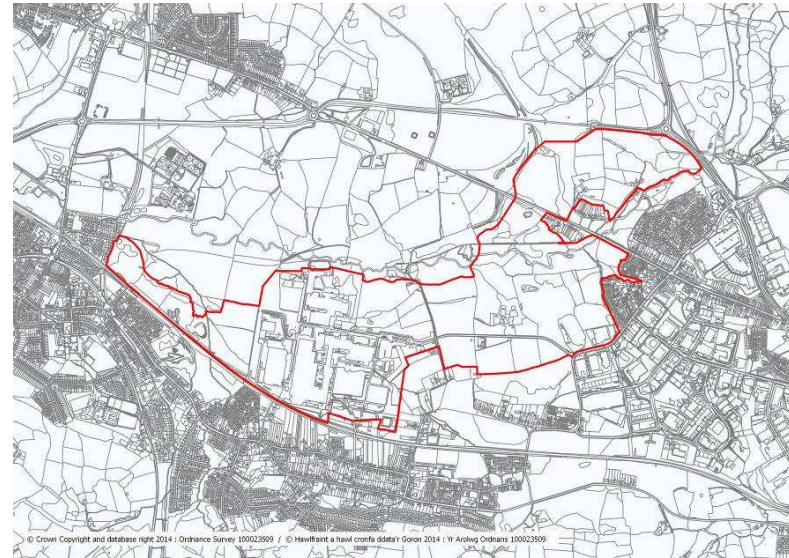
**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+	?	++	0	+	+	0	?	+	-	+/-	?	++	+/-	x	+/-	?	?	++	+	+

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<b>Reference</b>	<b>CO010*</b>
<b>Name</b>	<b>Land north, south west and west of Titanium Road; north of Ystrad Road; north and south of Carmarthen Road and south of Swansea Road and west of Hospital Road</b>
<b>Description</b>	Part employment (B1, B2 & B8 uses), part residential with associated community and local retail facilities, riverside park/nature area, new access road and associated services. Proposal includes a new access road from the A484 and the potential to accommodate up to 1000 dwellings (see also CO012, C0021, C0031, KB001, KB009 (part), KB005 (part) and KB013 are parcels of land within his large strategic site). Site is located to the west of Fforestfach and north of Waunarlwydd/Gowerton
<b>Size</b>	173.3 Ha
<b>Existing Land use</b>	Part employment land, vacant/brownfield land, agricultural land/holding, common land, green wedge, open countryside
<b>Proposed Land Use</b>	Mixed Use including residential (up top 1000 homes) and employment uses
<b>Location Plans</b>	OS Plan and Aerial (not to scale)

\*Incorporating (CO021 Former Alcoa site; KB001 Land at Llwyn Cadwgan; KB009 Land south of A484, north of B4260; and KB013 Land north of Swansea Rd, Kingsbridge)



**Candidate Site Public Consultation: Summary of Representations**

Candidate Sites were advertised on site in the form of site notices.

**CO010**

145 letters of objection were received which are summarised below:

- SINC
- Supports populations of designated species of principal importance for conservation
- Loss of local amenity
- Common land
- Green wedge
- Coalescence of settlements
- Inadequate road infrastructure.
- Adverse impact on pollution levels and noise levels
- Unacceptable strain on facilities e.g. doctors, dentists etc.
- Inadequate water and sewerage facilities
- Inadequate employment in area
- Heritage site
- Possible unstable land due to old mine operations
- Already overpopulated
- Local schools at capacity
- Loss of recreational space
- Adverse impact on health and well being
- Adverse impact on village character
- Adverse impact on privacy
- Devaluation of property
- Possible adverse impact on crime and anti-social behaviour
- Possible flood risks
- Ample vacant industrial units - no need to build more



**CO021**

6 letters of objection were received which are summarised below:

- No proven need for additional industrial units, there are ample vacant units already
- Adverse impact on character and community of the village
- Many unsold properties currently on the market, building more would damage the property market further
- Inadequate road infrastructure
- Flooding risk
- Negative impact on lives of existing residents
- Adverse impact on wildlife and loss of habitat

1 letter of support was received which is summarised below:

- Support residential aspect providing road infrastructure can cope
- Could add to the vibrancy of the area
- Sympathetic design could visually benefit the area

**KB001**

164 letters of objection were received which are summarised below:

- Green Belt.
- Increased traffic on very busy roads/highway safety.
- Adverse impact on wildlife/loss of habitat.
- Loss of agricultural land.
- Local schools at capacity.
- Lack of local services/facilities e.g. medical facilities.
- Detrimental to existing communities.
- Detrimental to local environment.
- Inadequate site access.
- Increase in noise pollution and air pollution.
- Encroachment into open countryside.
- Loss of 'green living'.
- Loss of open space.
- Adverse impact on health & wellbeing.

- Flood risk/inadequate drainage system.
- Coalescence of districts.
- Adverse impact on character and amenity.
- Urban sprawl.
- Common Land.
- Inadequate sewerage system.
- Historic importance.
- Possible unstable land due to old mine workings.
- Subsidence problems in the area.
- Loss of privacy.
- Devaluation of property.
- Loss of current local jobs.

**KB009**

11 letters of objection were received which are summarised below:

- Loss of green wedge
- Increase pollution
- Inadequate road infrastructure to accommodate additional traffic
- Local schools at capacity
- Adverse environmental impact
- Could lead to a loss in local employment
- Adverse impact on rural/countryside setting
- Loss of agricultural land
- Previous applications refused, reasons for refusal still applicable
- Adverse impact on wildlife/loss of habitat
- Common land
- Current UDP allocation falls into a hazardous installation consultation zone
- Local resources could not support an increase in population
- Adverse impact on character and amenity
- Coalescence of settlements

- Adverse impact on health and wellbeing

**KB013**

No comments received

**LDP Preferred Strategy Consultation: Summary of Representations**

**CO010**

Representations on the Preferred Strategy raised the following issues relating to the strategic site:

- Penllergaer Estates Ltd and Urban Style Land support the identification of Gowerton as an area for growth.
- Alcoa and Urban Style Land promote Westfield park/Alcoa.
- Promotion of GT006 for residential development.
- Concern about the capacity of Gowerton's transport, sewerage and social infrastructure to accommodate proposed scale of development, particularly in light of the impact of past developments
- The HRA findings indicate that proposed development at Gowerton/Waunarlwydd may need to provide adequate mitigation measures to avoid cancel or reduce:
  - i. effects on the aquatic environment
  - ii. effects on mobile species
  - iii. effects from recreation
  - iv. effects from disturbance, noise and lighting

**CO021, KB001, KB009 and KB013**

No specific responses received in relation to these sites

**LDP Draft Proposals Map Consultation: Summary of Representations**

**CO010**

8 letters of objection were received which reiterated previous comments and made the following additional observations:

- Highways improvements required address congestion issues in Gipsy Cross & Tycoch areas/ routes linking to Sketty/Killay. No development should occur prior to outcome of Strategic Highways Assessment.
- Inappropriate scale of development. Overdevelopment, existing communities will be subsumed into wider Fforestfach area. Particularly re Llewitha community.
- Timet object to inclusion of residential uses on the strategic site masterplan for the Alcoa site. Consider more appropriate to retain whole site for employment use.
- Baseline noise assessment required.
- Proposals for land adjacent Gowerton station should include a 24/7 transport interchange.

2 letters of support were received for development of the Strategic Site, the reasons for support are summarised below

- Will enable delivery of a new highway link, which will in turn open up significant development opportunities
- Urbanstyle Land control land immediately to the north of Gowerton Railway Station. It is considered that this facility could, with improved facilities and access, provide an important, sustainable transport hub serving not only the proposed Strategic Site but existing local residents and occupiers.

1 comment was received

- Results of Transport Assessment required before further decisions made on the strategic site.

**CO021**

2 letters of support were received for development of the Strategic Site, the reasons for support are summarised below

- Will enable delivery of a new highway link, which will in turn open up significant development opportunities
- Urbanstyle Land control land immediately to the north of Gowerton Railway Station. It is considered that this facility could, with improved facilities and access, provide an important, sustainable transport hub serving not only the proposed Strategic Site but existing local residents and occupiers.

**KB001**

1 letter of objection received:

- Within - Ancient Semi Natural Woodland

**KB009 and KB013**

No specific responses received in relation to these sites

**Response to Representations**

- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the plan. In the case of strategic sites, this is achieved through a process of detailed masterplanning which seeks to ensure that the appropriate levels of provision of community services and facilities are provided. This includes ensuring that the appropriate levels of education, healthcare, open space/green infrastructure networks are provided. It also includes ensuring that all constraints identified on the site, such as noise, pollution, unstable and contaminated land, and flood risk are addressed and/or relevant mitigation measures are proposed as part of the development.
- The issue of potential impacts of noise pollution arising from the mix of development uses and the loss of trees on sites adjoining the Industrial Park has been referred to the Council's Environmental Health department for further consideration.
- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA).
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries. The Woodland Trust have highlighted that areas of ancient woodland are located within the site, along the river corridor. The draft concept masterplan currently shows this area to be part of the green infrastructure network. However, the detailed information about the location of these sites will be taken into account in the detailed masterplanning of the site to ensure that they are given appropriate protection.

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- The presence of SINC's within the proposed strategic site area is acknowledged. The County Ecologist has been consulted and is working together with Developers to ensure that the siting of development and the creation of green corridors throughout the site will minimise the impact of development on such areas and that the appropriate mitigation measures are incorporated into the design and layout of the proposals at an early stage.
- The boundary of the strategic site includes a reduced area of common land in comparison to the original site submission. However, the inclusion of common land is an issue which is recognised in the strategic concept plan which states that the proposals seek to be sympathetic to the landscape and ecological character of any areas designated as Common Land. The siting of the proposals will minimise development on such areas and the proposals will ensure that there will be no net loss in Common Land through the re-classification of other appropriate land in the area.
- Coalescence is a key issue which the strategic concept plan seeks to address. A considerable area of accessible open space is proposed as part of the development and green barriers have been incorporated into the scheme layout to mark and ensure separation between the proposed development area and the existing and planned expanded communities to the north and west. The strategic concept plan states that "the design has evolved, principally through a rationalisation of development parcels in a southerly and easterly direction, to ensure that there is a clear separation at the western boundary of the strategic development (ensuring that any potential coalescence is eliminated from the outset). This seeks to ensure that the development responds to the character of existing settlements. With regard to the specific issue of coalescence with the community of Llewitha, the strategic concept plans show areas of green buffers between the existing community and new development. Detailed masterplans will be drawn up to inform the deposit allocations and this issue will be taken into consideration when determining the finer details of the site layout.
- The capacity of the strategic road infrastructure is a key issue which the LDP seeks to address. The underlying vision for the site is based on providing a new highway link from the A484 Llanelli Link Road to the north, which will facilitate the delivery of a mix of employment, residential and supporting uses which will extend the existing settlement in a sustainable manner and will facilitate significant improvements to the wider area. The council have commissioned a Strategic Highway Network Assessment which will provide information about the cumulative impact of the proposed level of growth across the county and this will inform the detailed masterplanning process.
- DCWW have indicated that an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on the water network and to establish the extent of off-site mains required to service the site. With regard to waste water treatment, DCWW have confirmed that a hydraulic modelling assessment may be required to understand the point of connection to the public sewerage system and any improvements required. Where sites are allocated in an adopted development plan, DCWW are required to include all necessary improvements to support the development in their statutory improvement plan.

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- Comments refer to a heritage site. The original site extended further to the west adjacent to the roman practice works. However, the site boundary has now been moved further east. Where historic features are found to be present, a high level of protection will be afforded to the preservation and safeguarding of historic features and their settings. This does not preclude development proposals from being brought forward, however significant prior assessment and evaluation must be carried out and appropriate mitigation measures undertaken if development is considered appropriate.
- An Environmental Site Investigation provided with the original candidate site submission provides the technical information about historical ground conditions such as unstable/contaminated land or past mining operations which will inform the detailed masterplanning process. In addition, the Council's Environmental Health Section provides information on guidance on historic site activities, including the location of landfill sites and appropriate buffer zones. The Coal Authority provides advice on past mining operations. Existence of such features on or near to a site does not preclude development and a detailed ground conditions survey would need to be undertaken at planning application stage to identify and address all such issues.
- The UDP identifies the land as green wedge and being within the open countryside. However, upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions, e.g. current UDP designations and past application and appeal decisions) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. The purpose of green wedges is to prevent coalescence between settlements. Coalescence is a key issue which the strategic concept plan seeks to address. A considerable area of accessible open space is proposed as part of the development and green barriers have been incorporated into the scheme layout to mark and ensure separation between the proposed development area and the existing and planned expanded communities to the north and west. The strategic concept plan states that "the design has evolved, principally through a rationalisation of development parcels in a southerly and easterly direction, to ensure that there is a clear separation at the western boundary of the strategic development (ensuring that any potential coalescence is eliminated from the outset). This seeks to ensure that the development responds to the character of existing settlements.
- The population of Swansea is growing year on year; there is a shortage of housing land, and a lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes. The SHMA identifies that around 4700 homes are needed within this strategic housing policy zone over the LDP period. By proposing development at a strategic scale, it is possible to ensure that the council delivers the LDP objectives of creating truly sustainable development which provides the physical and social infrastructure required to support the health and well being of both existing and future residents.

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- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who is fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. Where a need is demonstrated by the LEA, the Council will work with the Developer to ensure that appropriate education provision is secured as part of the masterplanning process.
- Any loss of recreational/open space will need to be addressed through compensatory provision within the proposed development or nearby. Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development. Provision of recreation and open space is a key development principle in the masterplan.
- Development will involve the loss of land currently in agricultural use. However, the Agricultural Land Classifications map reveals this site to be the less valuable Grade 4 and Grade 5 agricultural land.
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- Devaluation of property is not a material planning consideration There are no rights of open access or views over the countryside adjoining existing settlements
- Vulnerable development such as residential may not be allocated in flood risk zones. All flood risk areas have been identified and excluded from consideration for development purposes. Incidents of localised surface water flooding have also been identified and any sites allocated at or near such areas will be required to incorporate appropriate remedial measures. Sustainable urban drainage scheme (SUDS) will be incorporated into development schemes as necessary. New development must demonstrate greenfield run off - no increase in surface water run-off will be permitted. Flood maps show that the where the margins of the River Llan cuts across the middle of the strategic site from east to west is within a flood risk zone. However, this issue will be addressed in the mix and layout of uses in the detailed site masterplan.
- The proposal seeks to have a positive impact on local employment. A key part of the vision for this site is to provide the infrastructure necessary to support the development of Westfield Industrial Park as a strategic/regional employment location.



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- With regard to the supply of employment land, the Council commissioned Peter Brett Associates (PBA) to undertake an Economic Assessment and Employment Land Provision study in March 2012. The study provides a detailed evidence base for understanding the current supply in the market of employment land and buildings, as well as the requirements for future demand. The study indicates there is a sufficient supply of lower grade units within the County but identifies a requirement to bring forward higher quality facilities at key locations and to focus on regenerating land to provide strategic employment areas at Felindre, Fabian Way and Swansea West.
- Acknowledge that there is currently a supply of the smaller scale industrial units. However the vision for this site is to provide a regional scale, strategic employment site which will accommodate a scale of unit which is currently underrepresented in the County.
- Margins of River Llan cutting across the middle of the site from east to west are within a flood risk zone. However, this will be addressed in the mix and layout of uses in the detailed site masterplan.
- The Council will continue to work with the key development partners to produce a detailed masterplan for the strategic site which will consider the issues raised through the consultation process.

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site will likely need a new access from Llanelli Link road to the north. The site access would be best located off a fourth arm at Cadle roundabout. This will require detailed design and modelling to ensure acceptability.</p> <p><u>Local Highway Conditions:</u> Existing roads have limited capacity to accommodate a development site of this size. There are traffic volume issues and safety issues in the vicinity of the site access which will need to be addressed.</p> <p><u>Accessibility:</u> There is a 30 min frequency service approximately 400m south and a 10-15 min frequency to the north past the site. There is a 10-15 min frequency on the east of the site</p>

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	<p><u>Wider Issues / Combined effect:</u> The affect of significant additional traffic on the Pontardulais Road and Carmarthen Road corridor will need to be assessed and considered. The Pontardulais Road corridor is subject to peak time congestion and issues of accidents in the vicinity. Capacity issues are also present at J47 of the M4. Limited capacity of local roads. Significant traffic generation cannot be accommodated without improvements being undertaken.</p> <p><u>Restrictions:</u> The development needs to include a new access to the site. Schemes to address congestion on the major arterial routes in the area will be necessary to support any significant development.</p> <p><u>Transport Proposals:</u> The site will need to be considered for its suitability to accommodate a new link road through to serve Swansea West Industrial Estate. This would require a high standard spine road with all development being accessed from secondary roads.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 2100 homes are needed within the north strategic housing policy zone and 4700 dwellings within the greater north west strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p><b>CO010</b></p> <p>Lowland Meadow, Purple Moor-grass and Rush pasture, Wet Woodland supporting an assemblage of ancient woodland indicator species, Lowland Mixed Deciduous Woodland, Relatively species-rich Neutral grassland, pond, Running water, Diverse scrub, and Species-rich Bracken</p> <p>Lowland Meadow, Purple Moor-grass and Rush pasture, Wet Woodland, Lowland Mixed Deciduous Woodland, Running water, pond and Running water are habitats of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p> <p>Priority species recorded on this site; Bullfinch, Diny skipper, Common grasshopper warbler, Kestrel, Reed bunting, Sharp-leaved fluellen, Small Heath, Song thrush, Starling and streak.</p> <p>Contributory important species recorded on this site; Barn Owl, Corn Marigold, Green Woodpecker and Water Rail</p>

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	<p><b>CO021</b> This site contains diverse scrub and may contain; Lowland Mixed Deciduous Woodland, Purple Moor-grass and Rush pasture, open mosaic on previously developed land and semi-natural woodland. An extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey.</p> <p><b>KB001</b> This site contains; Lowland Mixed Deciduous Woodland and may contains Purple Moor-grass and Rush pasture and potentially important Hedgerows protected under the Hedgerow Regulations (1997). Lowland Mixed Deciduous Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p>
CCS Environmental Health	<p><b>CO010</b> Landfill underneath &amp; Buffer Zone around industrial estate. Gas pipeline (plus buffer zone) crosses site from north to south</p> <p><b>CO021</b> Employment B1, B2, B9 + RESIDENTIAL: potential conflict between uses</p>
CCS Education	<p><u>Waunarlwydd and Cadle Primary</u>: The number of developments in the Waunarlwydd catchment would generate a need for a new school. This development would require a Primary and Secondary Build (CO021/010). There are concerns over available walking routes from these proposed developments</p> <p><u>Gowerton and Bishop Gore Comprehensive</u>: Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>

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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required. Concerns regarding the number of proposed houses and their effect on the sewerage infrastructure at this location.</p> <p>BAP Habitat. The site is largely comprised of fields separated by hedgerows. Numerous ditches and watercourses cross the site. The Phase 1 map indicates some parcels of: semi-improved / marshy grassland, scrub and woodland. Some areas of woodland also appear to be classified as: Ancient Semi-Natural Woodland.</p> <p>WFD moderate.</p> <p>Site is partially within DAM C2 and NRW Flood zone 2/3. No highly vulnerable development (including upper level flats) should be allocated in this area. Main River Llan runs through site. Minimum of 7m development free buffer required to allow for access for maintenance.</p> <p>Potential contamination from historic uses - waste/landfill, industrial uses (Alcoa). Historic landfill highly likely. Aware that partial remediation has taken place previously.</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required.</p>

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	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Amended Welsh Water Comments (31.03.14):</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.  <u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Approx. 5 Mine Entries at west – C0010 ( original area) Unrecorded probable historic underground workings at shallow depth and Approx. 3 Mine Entries at south (C0021)

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Llwchwr Town Council	<p><b>CO010</b> The area of land forming this site does not specify an existing use. The site is a very large area and the proposed use of 'mixed use' is too general and would take the land outside the scope of planning control. The green wedge and common land should be retained and protected. The scale of this application is an attempt to drastically reduce the green wedge/common land. It is requested that the site should be rejected to protect the green wedge/common land. The community of Llwchwr are in favour of retaining the green wedge.</p> <p><b>KB001</b> The land forming this application is specified as having a current use as undeveloped land, which is incorrect. The current use of the land is agricultural land. The proposed use is specified as "mixed use". This is a substantial area of land which is currently part of the green wedge. It should be retained as green wedge and protected from development. The community of Llwchwr are in favour of retaining the green wedge.</p> <p><b>KB009</b> The land is described on the application as undeveloped land. The proposed use is for residential development. The land is in fact part of the green wedge and is common land. Under the UDP it is in a hazardous installation consultation zone. Under the circumstances this land should not be developed by retained as common land and green wedge. The Council would object to the proposed development of this land.</p>
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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	n/a	+1	+1	+2	?	-2	?	+2	+2	+2	n/a	+2	+2	0	n/a	0	0	-2	+1	n/a	?	+1	+1

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Stage 3B: Assessment Against SEA/SA Objectives

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	--	?	++	0	+	++	0	?	-	-	+/-	?	+	+/-	x	+/-	?	?	--	0	+/-

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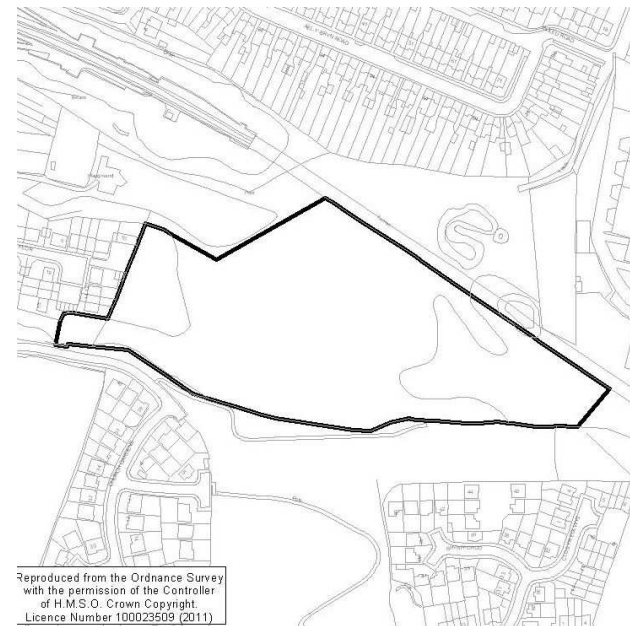


- 
 Proposed New Residential and Supporting Use  
Neighbourhoods / Settlement Extensions  
(Waunarlwydd / Fforestfach Strategic Development  
Area)
- 
 Proposed New Residential and Supporting Use  
Neighbourhoods / Settlement Extensions  
(Other Strategic Development Areas)
- 
 Proposed / Rationalised Employment and  
Economic Development



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<b>Reference</b>	<b>CO013</b>
<b>Name</b>	<b>Land adjacent to Cockett Pond</b>
<b>Description</b>	Irregular shaped site, bounded by new residential development to south and west plus an area of formal amenity space to the south. Land falls south to north and extends up to tunnelled route of West Wales railway line and Cockett Pond. Mainly scrub vegetation, open access land which forms part of a larger such area extending to the north
<b>Size</b>	2.832 Ha
<b>Existing Land use</b>	Green Space
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

1 x 144 signature petition of objection was received which is summarised below:

- Development would be detrimental to the community by means of overdevelopment
- Devaluation of property
- Inadequate access route
- Adverse impact on wildlife and destruction of habitat

18 letters of objection were received which are summarised below:

- Adverse impact on local character
- Ample unsold properties already on the market, building more houses would damage market further
- Loss of green space
- Overdeveloped residential and industrial areas
- Loss of recreational space
- Adverse impact on wildlife and loss of habitat
- Inadequate road infrastructure
- Possible adverse impact on crime and anti-social behaviour
- Green belt
- Adverse impact on noise and pollution
- Invasion of privacy
- Flood risk
- Negative impact on current residents quality of life

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

## LDP Draft Proposals Map Consultation: Summary of Representations

No comments were received specifically regarding this site.

## Response to Representations

- Any development proposal will need to comply with the Council's adopted design guidance for new residential development and respect the density, scale and character of adjoining development and the visual and residential amenities (e.g. privacy) of adjoining occupiers. New development would comply with community safety guidance aimed at reducing crime and anti-social behaviour
- Devaluation of property is subjective and not a material planning consideration
- The junctions leading to the site from Cockett Road have limited capacity and improvements will have to be identified and undertaken for this site to be brought forward – this will determine unit numbers which have been reduced from 70 to 50 since the original proposal was consulted upon
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site.
- The site is not greenbelt/ green wedge or common land
- Any loss of recreational/open space will need to be addressed through compensatory provision within the proposed development or nearby. Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development
- The LDP is based on sustainability principles which seek to maximise the use of vacant and underdeveloped land within existing settlements provided satisfactory standards of open space/recreational space are retained within those communities. This would be the case in this instance with informal recreational provision being retained around the site
- An extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but not an obstacle to development.
- Around 3% of the housing stock (approx 3500 dwellings) needs to be vacant at any given time for the housing market to operate. This allows for movement, refurbishment, deaths of occupiers, repossessions, etc and has been taken into consideration in the calculation of housing needs.

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- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- There are no flood risk issues associated with this site. Sustainable urban drainage scheme (SUDS) will need to be incorporated into development schemes as necessary. All new development needs to demonstrate that greenfield run –off will be achieved. No increase in surface water run-off would be permitted
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- There is no evidence to indicate a causal relationship between new development and increased crime rates. South Wales Police are fully consulted during the LDP preparation process and crime prevention measures will be considered as part of the design process accordance with the Council’s Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The access road leading to the site is not suitable to accommodate development of this size.</p> <p><u>Local Highway Conditions:</u> Limited capacity of the junctions leading to the site from Cockett Road.</p> <p><u>Accessibility:</u> There is a 10 min frequency service approximately 300m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Peak time congestion on Cockett Road will limit the amount of additional traffic that can be accommodated.</p> <p><u>Restrictions:</u> Cockett Road capacity and junction capacity in the vicinity are unlikely to support a development of this size at that location.</p> <p><i>NB Comments relate to original submission for 70 units</i></p>

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CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site may contain; semi-natural grassland, mature trees and scrub. An extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey.</p>
CCS Environmental Health	<p>Cockett Brick &amp; Tile Works: site investigation condition</p>
CCS Education	<p><u>Gors Infants &amp; Juniors</u>: There is sufficient surplus capacity at this school to accommodate additional pupils. However, there is concern over the condition of the school as Gors was formerly 2 schools (Infant and Junior) and does not meet the aspirations of 21st Century Schools.</p> <p><u>Dylan Thomas Comprehensive</u>: All of the secondary schools in the West of Swansea are currently under review as part of the ongoing Secondary Stakeholder Forum. There is no surplus capacity at Dylan Thomas school and no scope to extend.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>The site is composed of grassland, scrub and scattered trees. Possible BAP habitat. Provides good connectivity which should be maintained. Possible use by birds, foraging by bats and other species.</p> <p>WFD moderate.</p> <p>Potential contamination as located on infilled clay pit. Not aware of composition of infill material.</p>

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Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	?	+1	n/a	?	-1	n/a	+1	0	n/a	n/a	n/a	+1	n/a	n/a	-1	+1	-1	-2	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-1	?	+	0	+	?	0	?	+/-	-	+/-	?	++	+	x	+/-	?	?	+	0	-



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<b>Reference</b>	<b>CO018</b>
<b>Name</b>	<b>Land off Penrhos Place</b>
<b>Description</b>	Irregular backland site, mainly scrub, sloping from NW to SE and extending from Penrhos Place through to Gendros Ave East. Current UDP allocation. Surrounded by residential development and adjoins community facility/play area to southern boundary
<b>Size</b>	3.703 Ha
<b>Existing Land use</b>	Undeveloped Land and Informal Recreation
<b>Proposed Land Use</b>	Residential (Affordable Housing ) and Community Use
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

4 letters of objection were received which are summarised below:

- Inappropriate property types and layout
- Adverse impact on privacy
- Devaluation of property
- Green belt
- Loss of recreational space
- Adverse impact on wildlife and destruction of habitat
- Inadequate road infrastructure
- Already highly populated area
- Negative impact on lives of current residents

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

No additional comments received

### **Response to Representations**

- The site is not green belt - it is undeveloped land within the urban area which has long been allocated for residential development including in the current UDP (Policy HC1(38) refers)

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- No details of property type or layout are identified at this stage. Any development proposal will need to comply with the Council's adopted design guidance for new residential development and respect the density, scale and character of adjoining development and the visual and residential amenities (e.g. privacy) of adjoining occupiers.
- Devaluation of property is subjective and not a material planning consideration
- Access roads from the north are not suitable to support this site. Any access will need to be from the south via Gendros Avenue East and may require some form of traffic calming
- No significant ecological issues associated with the site, but more detailed survey work required at planning application stage
- Improved community/recreational facilities would be expected to the south of the site and open space provision within any development scheme

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access roads leading to the site are substandard in width and not suitable to accommodate any significant increase in use.</p> <p><u>Local Highway Conditions:</u> Substandard access roads in the vicinity.</p> <p><u>Accessibility:</u> There is a 60 min frequency service 100m from site and a 10 min frequency 200m away. A further 60 min service runs past the south of the site.</p> <p><u>Wider Issues / Combined effect:</u> None identified.</p> <p><u>Restrictions:</u> Access roads from the north are not suitable to support this site. Any access will need to be from the south via Gendros Avenue East and may require some form of traffic calming.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.</p> <p>Put forward by HET for up to 110 units, but less as mixed use with community facilities to the south</p>
CCS Biodiversity	<p>This site contains; species poor Purple Moor-grass and Rush pasture and scrub.</p>

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CCS Environmental Health	No issues
CCS Education	There is some surplus capacity but overall there is limited scope to further extend Gendros Primary due to the restrictive nature of the site. All of the secondary schools in the West of Swansea are currently under review as part of the ongoing Secondary Stakeholder Forum. There is no surplus capacity at Dylan Thomas school and no scope to extend.
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	This a fairly large greenfield site within a largely urban area. It is mainly composed of grassland with some mature trees, scrub/woodland.
Dwr Cymru	<u>Water Supply:</u> Initial Comments for Candidate Sites in the Ward: For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.  <u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.  <u>Waste:</u> <u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site  Swansea Bay Waste Water Treatment Works capacity – ok.
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth and approximately 3 mine entries

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**Stage 3A: Assessment Against LDP Objectives**

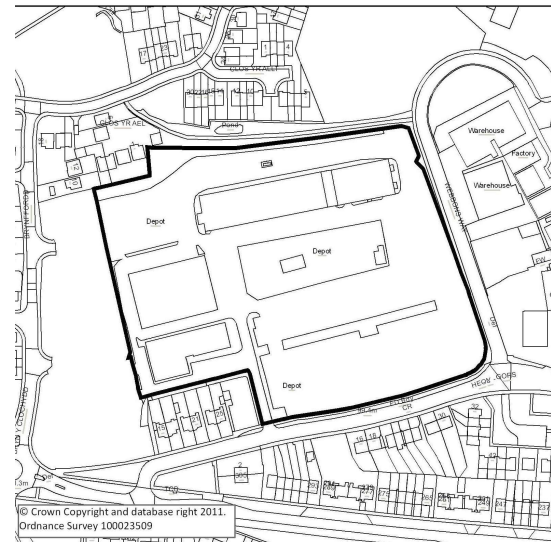
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	1	n/a	?	1	n/a	?	-1	n/a	1	0	n/a	n/a	n/a	1	n/a	n/a	-1	0	-1	-1	n/a	?	1	1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+/-	?	+	0	+	?	0	?	+	-	+	?	++	+	X	+	?	?	++	0	-

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<b>Reference</b>	<b>CO027</b>
<b>Name</b>	<b>BT Depot, Gors Avenue, Townhill</b>
<b>Description</b>	<p>The site is 3.34 ha in area and accommodates technical, administration, welfare, logistics and ancillary buildings in the southern two-thirds, and a motor transport workshop (MTW) in the northern third.</p> <p>The southern part of the property - totalling 2.14 ha - is now surplus to its operational requirements and available for disposal. The 1.2ha MTW to the northern part of the site would be retained, but with provision for future redevelopment. Current application for 73 units being considered.</p>
<b>Size</b>	3.34/ 2.14Ha
<b>Existing Land use</b>	B8 Storage / UDP Housing allocation
<b>Proposed Land Use</b>	Residential and BT Depot
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

No representations received.

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

**LDP Draft Proposals Map Consultation: Summary of Representations**

No comments were received specifically regarding this site.

**Response to Representations**

No representations received.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site can be accessed from Gors Avenue. There is also a possibility of access from the adjacent housing development.</p> <p><u>Local Highway Conditions:</u> Traffic impact will likely need to be assessed.</p> <p><u>Accessibility:</u> There is a 10-15 min frequency service 175m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Limited capacity of local roads.</p> <p><u>Restrictions:</u> Access improvements are required.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	No issues – extended phase 1 habitat survey submitted with current planning application
CCS Environmental Health	Proximity to nearby commercial and industrial units to be taken into consideration
CCS Education	<p><u>Gors Primary:</u> There is sufficient surplus capacity at this school to accommodate additional pupils. However, there is concern over the condition of the school as Gors was formerly 2 schools (Infant and Junior) and does not meet the aspirations of 21st Century Schools.</p> <p><u>Dylan Thomas Comprehensive:</u> All of the secondary schools in the West of Swansea are currently under review as part of the ongoing Secondary Stakeholder Forum. There is no surplus capacity at Dylan Thomas school and no scope to extend.</p>
External Stakeholder	Comments
NRW	<p>Consider MOU. Boundary of Swansea Bay STW/Gowerton STW. Concerns regarding the Gowerton STW may therefore be applicable.</p> <p>Site &lt;200m from Cockett Pond landfill (to the north of the site).</p>

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<p>Dwr Cymru</p>	<p><u>Water Supply:</u> Initial Comments for Candidate Sites in the Ward: For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Amended Welsh Water Comments (31.03.14):</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p>
<p>Western Power</p>	<p>There is currently spare transformation capacity, which may be able to accommodate future load growth.</p>
<p>Coal Authority</p>	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth/Shallow – Recorded shallow coal workings and mine entry at south</p>



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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	+1	n/a	+1	0	n/a	n/a	+1	+1	n/a	n/a	+1	0	0	0	n/a	?	+1	+1

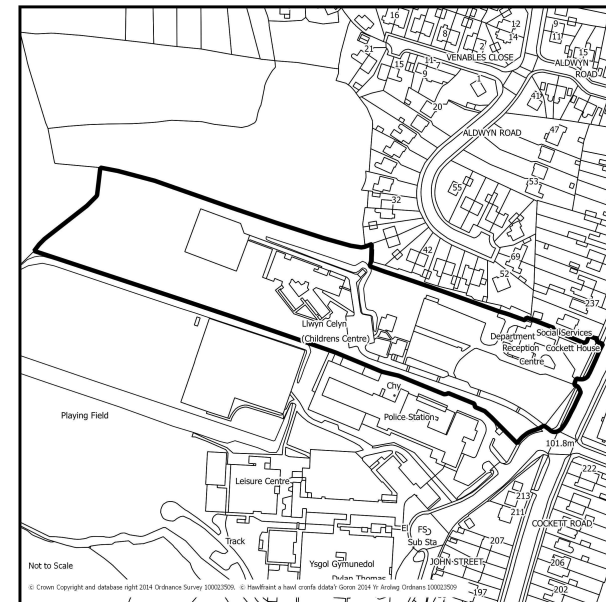
**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	++	?	+	0	+	+	0	?	+	0	+	?	++	+	x	+/-	?	?	0	0	+

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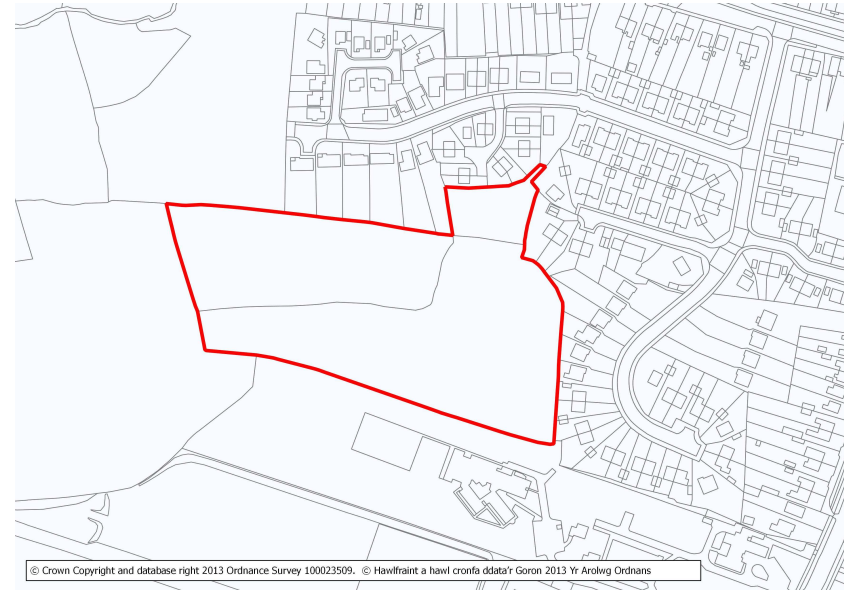
<b>Reference</b>	<b>CO037</b>
<b>Name</b>	<b>Cockett House</b>
<b>Description</b>	Land and Buildings, including car parking areas used as satellite offices for Social Services. Located on the western side of Cockett Rd north of the Police Station. Bounded by residential properties in part to the north and also open countryside to the north and west
<b>Size</b>	2.6Ha
<b>Existing Land use</b>	Council Offices - Social Services
<b>Proposed Land Use</b>	Residential (30 dwellings)
<b>Location Plans</b>	OS Plan and Aerial (not to scale)

Amended site boundary. Dec 2014



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Original CS boundary



**Candidate Site Public Consultation: Summary of Representations**

Candidate Site Register Consultation – Not applicable - new site

**LDP Preferred Strategy Consultation: Summary of Representations**

Candidate Site Register Consultation – Not applicable - new site

**LDP Draft Proposals Map Consultation: Summary of Representations**

Site notice was posted 9<sup>th</sup> December 2014 – No comments received

**Response to Representations**

No representations received.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The existing access could potentially be used although a further assessment of the impact of closing that access off and accessing the site from St. Johns Road should be investigated, possibly signalling the junction? Impact on through traffic would also need assessing.</p> <p><u>Local Highway Conditions:</u> Residential traffic would likely have a different pattern of movement than the current use. Currently there may be more traffic entering the site in the am peak whereas for residential it would be the pm peak.</p> <p><u>Accessibility:</u> There is a 10 min frequency service approximately 200m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Peak time congestion on Cockett Road will limit the amount of additional traffic that can be accommodated.</p> <p><u>Restrictions:</u> Cockett Road capacity and junction capacity in the vicinity</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>Would need an extended phase 1 survey. Not a SINC Ecology possibly moderate constraint</p>
CCS Environmental Health	<p>No issues identified</p>
CCS Education	<p><u>Gors Primary:</u> There is some surplus capacity at this school to accommodate additional pupils. However, there is concern over the condition of the school as Gors was formerly 2 schools (Infant and Junior) and does not meet the aspirations of 21st Century Schools.</p> <p><u>Dylan Thomas Comprehensive:</u> All of the secondary schools in the West of Swansea are currently under review as part of the ongoing QEd Programme. There is some surplus capacity at Dylan Thomas school but no scope to extend. There are major highway concerns. All the developments within the catchment would generate the need for a New Secondary school building</p>

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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>Small number of mature trees present on site. Should any demolition / alteration of the existing building take place, an assessment/survey of its suitability for bat species should be undertaken. Possible use of buildings by bats.</p>
Dwr Cymru	<p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p>No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	n/a	0	n/a	+1	+1	n/a	n/a	n/a	+1	n/a	n/a	+1	0	-1	0	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	+	+	0	?	+	+/-	+/-	?	++	+	x	+/-	?	?	++	0	-



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<b>Reference</b>	<b>LF001</b>
<b>Name</b>	<b>Walters Yard, off Swansea Road, Pontlliw</b>
<b>Description</b>	Irregular shaped, level, storage yard site within existing settlement boundary to western side of village. Brownfield site with a rail line running along the north eastern boundary at an elevated level separating it from residential development further east. There is a scrap yard adjoining and an industrial unit to the south east. Agricultural fields border the remainder of the site.
<b>Size</b>	2.2 Ha
<b>Existing Land use</b>	Transport Yard
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

5 letters of objection were received which are summarised below:

- Encroachment into the open countryside
- Would create pressure for further release
- Continued expansion of the community of Pontlliw is unsustainable and not desirable
- Local school is at capacity
- Significant increase in traffic
- Development in the adjacent areas of Pontarddulais and Penllergaer is effecting the existing population of Pontlliw
- Contrary to current policy
- Outside existing boundaries
- Highway safety
- Detrimental effects of the viability and vitality of the area
- Road infrastructure unable to accommodate increase in traffic
- The shared access could not accommodate additional traffic on such a scale
- Flood risk
- Increase noise pollution
- Adverse impact on the areas semi-rural character

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

No representations were received.



## Response to Representations

- NW corner of site would marginally extend outside existing settlement boundary but the land is clearly not open countryside and is better associated with the existing brownfield site. However upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan.
- Each site is looked at on its individual merits and does not set a precedent as all policy is being considered anew.
- The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period. There is scope for additional dwellings in Pontlliw, as services and facilities available in close proximity and will meet the LDP objective of creating healthy and sustainable communities. Impacts of cumulative developments will be carefully considered, for example on infrastructure capacity and amenity.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- Highways can accommodate additional traffic and no highway objection subject to access improvements. Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site.
- The population of Swansea is growing year on year, there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- Expansion is needed of all settlements within the Greater North West Area of the County and all proposals will need to deliver infrastructure improvements, a range of new community services and facilities and create high quality viable residential environments for a mix of future occupiers including affordable and local needs housing to ensure communities remain sustainable.

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- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- Insufficient information to be able to assess impact on character and amenity, but any development would need to comply with the Council's Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control.
- Vulnerable development such as residential may not be allocated in flood risk zones. All flood risk areas have been identified and excluded from consideration for development purposes. Incidents of localised surface water flooding have also been identified and any sites allocated at or near such areas will be required to incorporate appropriate remedial measures. Sustainable urban drainage scheme (SUDS) will be incorporated into development scheme as necessary. New development must demonstrate greenfield run off - no increase in surface water run-off will be permitted

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: Access improvements are required.</p> <p><u>Local Highway Conditions</u>: Traffic congestion at Penllergaer / Junction 47.</p> <p><u>Accessibility</u>: There is a 30 min frequency bus service past the site entrance.</p> <p><u>Wider Issues / Combined effect</u>: Affect on congestion at Penllergaer will need to be considered.</p> <p><u>Restrictions</u>: Quantity of development is subject to detailed design.</p> <p><u>Transport Proposals</u>: None at present</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4700 homes are needed within this strategic housing policy zone over the LDP period.</p>

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CCS Biodiversity	This site may contain; Purple Moor-grass and Rush pasture, scrub and protected under HR. An extended phase1 habitat survey to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey.
CCS Environmental Health	3 potential noise sources to be considered in application design/detail
CCS Education	<p><u>Pontlliw Primary</u> : School is at capacity. There are difficulties in developing the small village site any further. To take the increased pupil numbers generated, investment would be required</p> <p><u>Pontarddulais Comprehensive</u>: School is at capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>MOU</p> <p>Small sections of woodland lie adjacent to the north and south of the site. Possible BAP habitat within the west of the site. A PRoW runs along the north western boundary of the site. The Phase 1 map classifies the vegetation at the west on the site as swamp.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site.</p>

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	<p><u>Sewerage:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development. Proposals for site ref LF004, LF008, LF0018 and LF006 will impact on our Cuckoo Mill Sewage Pumping Station. An assessment of this SPS will be required to understand the extent of improvements required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/or diversion may be required.</p> <p>Gowerton Waste Water Treatment Works – Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Pontlliw Community Council	Allocation of this site is contrary to UDP policy. It is relatively large site, would involve development into the open countryside and could not be called "small scale rounding off". It Lies outside the existing boundary of Pontlliw. This site was rejected at UDP stage Ref108, for above reasons. The general observation is made that "continued expansion of the community of Pontlliw is unsustainable and not desirable". Each of these considerations remains relevant. Development in Pontarddulais and Penllergaer is having a detrimental effect on the existing population of Pontlliw. Penllergaer School is full. Increase in traffic.

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	Candidate site LF0001 Walters Yard off Swansea Road, Pontlliw is on the Unitary Development Plan rejection list at number 108. In rejecting the site it is commented that development of this site "would take development out into the open countryside and would create pressure for further release". The general observation is made that "continued expansion of the community of Pontlliw is unsustainable and not desirable". Development in the adjacent areas of Pontarddulais and Penllergaer is effecting the existing population of Pontlliw. Penllergaer School is full. The increase in traffic is noticeable and significant.
Councillor Gareth Sullivan	I note that a previous application for this site was refused by Committee. I feel that a full traffic impact study on the affect such a development on the infrastructure of Pontlliw and Penllergaer should be made, before any further progress is made.

**Stage 3A: Assessment Against LDP Objectives**

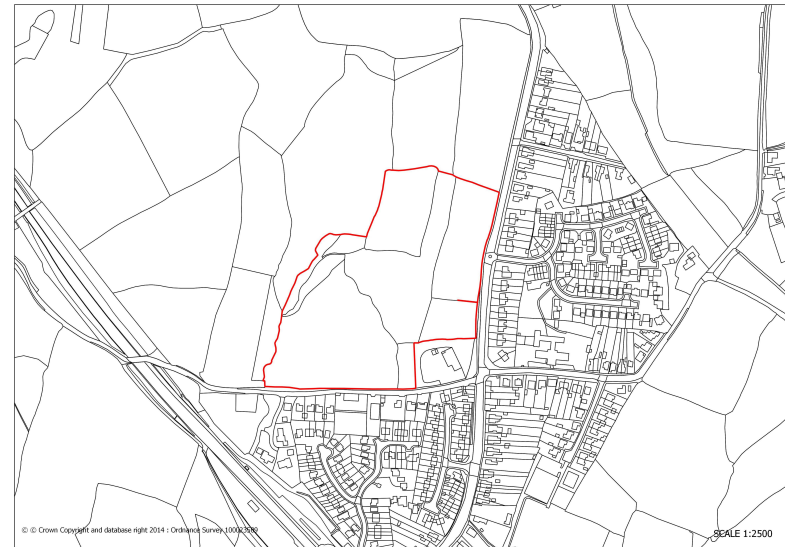
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	n/a	n/a	?	0	n/a	+1	n/a	n/a	n/a	n/a	+1	0	n/a	-1	-1	-1	-1	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	++	-	?	+/-	0	+	+	0	?	+/-	+/-	+/-	?	+/-	+/-	x	+/-	?	?	-	-	+

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<b>Reference</b>	<b>LF002</b>
<b>Name</b>	<b>Land at Carmel Road and Bryntirion Road, Pontlliw</b>
<b>Description</b>	Site is located to the west and north of existing development at this crossroads location to the north west of Pontlliw. It wraps around to the rear of the community centre on land that currently lies outside the defined village boundary. The site has been amended from the originally proposed frontage development and includes additional land to the west and part of Candidate Site LF005
<b>Size</b>	5.5Ha
<b>Existing Land use</b>	Agricultural
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

Candidate Site application LF002 was advertised on site in the form of site notices. The previous Candidate Site LF002(a) was advertised on site in 2010 in the form of site notices.

4 letters of objection were received which are summarised below:

- Ribbon development
- Encroachment into open countryside
- Outside defined boundaries
- Development in Pontarddulais and Penllergaer is effecting the existing population of Pontlliw
- Local school at capacity
- Significant increase in traffic
- Loss of agricultural land
- Contrary to current policy
- Lack of local services
- Adverse impact on character and amenity
- Increased noise pollution

Candidate Site application LF005 was advertised on site in the form of site notices.

9 letters of objection were received which are summarised below:

- Outside defined boundary
- Contrary to current policy
- Access road incapable of supporting the additional volume of traffic
- Previous comments in respect of UDP still relevant
- Highway safety
- Local school is full
- Significant increase in traffic
- Adverse impact on the character of the community and its amenities
- Loss of agricultural land
- Increased noise pollution

### **LDP Preferred Strategy Consultation: Summary of Representations**

Persimmon Homes support the inclusion of Candidate Site LF002 – Land at Bryn Tirion Road, Pontlliw.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

1 letter of objection was received which made the following additional observation:

- Development would be on a mixture of meadows and woodland, a loss of valuable wildlife habitats.

2 letters in support of the allocation were received.

### **Response to Representations**

- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan. Each site is looked at on its individual merits and does not set a precedent as all policy is being considered anew.
- The population of Swansea is growing year on year, there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes. There is scope for additional dwellings in Pontlliw, as services and facilities available in close proximity and will meet the LDP objective of creating healthy and sustainable communities. Impacts of cumulative developments will be carefully considered, for example on infrastructure capacity and amenity.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.



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- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site. The council have commissioned a Strategic Highway Network Assessment which will inform the detailed masterplanning process.
- Acknowledge site is agricultural land but no indication loss of land would impact on viability of a wider agricultural holding. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land.
- The village has good local services within walking distance to the site, for example Primary School, community hall, local shops. The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- Insufficient information to be able to impact on character and amenity. This is a matter for planning application stage. Any development would need to comply with the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control.
- An extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA).
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access restrictions may be required off Bryntirion Rd. Access can be gained from Carmel Road, which will need improvement</p> <p><u>Local Highway Conditions:</u> Traffic congestion at Penllergaer/Junction 47. Substandard nature of Carmel Road</p> <p><u>Accessibility:</u> There is a 30 min frequency bus service past the site 195m from the edge of the site</p> <p><u>Wider Issues / Combined effect:</u> Affect on congestion at Penllergaer will need to be considered Impact on traffic signals at Carmel Road / Bryntirion Road will need to be assessed together with impact on Penllergaer / Junction 47 congestion A transport assessment will be required in support of any proposal</p> <p><u>Restrictions:</u> Quantity of development is subject to detailed design. Access may be best at specific points rather than direct frontage access to dwellings off Bryntirion Rd. Potentially, there will be a need to consider mini roundabout provision at access points Subject to detailed assessment, but Carmel Road will need to be improved.</p> <p><u>Transport Proposals:</u> None at present</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4,700 homes are needed within this strategic housing policy zone over the LDP period</p>
CCS Biodiversity	<p>Field which may contain the priority habitat Purple Moor-grass and Rush pasture, which could be classified as Species rich Marshy grassland under the SINC guidance. The site also contains potentially important hedgerows protected under HR.</p> <p>An Extended phase1 survey; a hedgerow assessment, habitat type and species richness assessment for the Purple Moor-grass and Rush pasture and the presence of any protected species. Important features highlighted may require further survey</p>
CCS Environmental Health	No issues identified

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CCS Education	<p><u>Pontlliw Primary</u>: School is at capacity. There are difficulties in developing the small village site any further. To take the increased pupil numbers generated, investment would be required</p> <p><u>Pontarddulais Comprehensive</u>: School is at capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Constraints: MOU.</p> <p>Possible BAP Habitat. Hedgerows are composed of mature trees and the site is crossed by several streams/ditches. Also includes a small block of woodland and a number of individual mature trees within the grassland. There are records of bat species within the area. The Phase 1 map classifies this site as semi-improved/marshy grassland, with small areas of scrub/woodland.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site.</p> <p><u>Sewerage</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development. Proposals for site ref LF004, LF008, LF0018 and LF006 will impact on our Cuckoo Mill Sewage Pumping Station. An assessment of this SPS will be required to understand the extent of improvements required.</p>

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	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth
Coal Authority	M3 identifies it as being located within a coal mining referral area. No coal mining legacy features identified by the Coal Authority.
Pontlliw Community Council	The development of candidate site LF0002, land to the west of Bryntirion Road, would inevitably lead to a form of ribbon development. This ribbon development would be out into the open countryside and outside the defined boundary of Pontlliw in the Unitary Development Plan adopted by the City Council in 2008. Development which has, or is, taking place in the adjacent areas of Pontarddulais and Penllergaer is having an effect on the existing population of Pontlliw. Penllergaer School is full. The increase in traffic, particularly at peak times, is noticeable and significant.
Councillor Gareth Sullivan	Previous applications for this site have also been refused, because of the obvious intrusion into the Countryside. This is a green field site and any development along these roads would widen the Village envelope and would result in the loss of agricultural land. It would also mean that the village would lose its Village identity and become a continuous development linking Pontlliw and Pontarddulais.

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**Stage 3A: Assessment Against LDP Objectives**

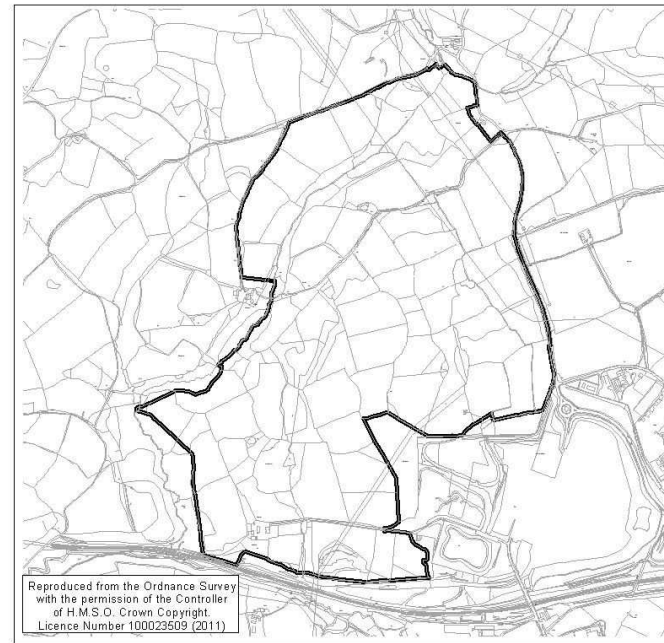
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-2	n/a	+1	0	n/a	n/a	n/a	2	0	n/a	-2	0	-1	-1	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	+	+	0	?	+	-	+/-	?	+	+/-	x	+	?	?	--	-	?

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<b>Reference</b>	<b>LF009</b>
<b>Name</b>	<b>Land Adjacent to the Former Felindre Tinplate works, Felindre</b>
<b>Description</b>	Large Greenfield site to the north of the M4, adjacent to the former Felindre tinplate works. The proposal is a joint Venture between the Council and the Welsh Government (WG). The Council and WG's vision for Felindre is to develop the former tinplate works site as a high level strategic business park serving South Wales with complementary major residential development, associated supporting uses, community facilities and open space on the Greenfield part of the site
<b>Size</b>	121.4 Ha
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential, community facilities, retail and open space with associated adjoining Strategic Business Park
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

5 letters of objection were received which are summarised below:

- Detrimental impact on wildlife/loss of habitat
- Loss of agricultural land
- No objection to use as a Strategic Business Park, however strongly object to proposed residential employment units and ancillary units
- Local schools at capacity
- Already overdeveloped area
- Increased traffic on already busy roads
- Possible adverse impact on crime
- Increased pollution
- Adverse impact on quality of life

### **LDP Preferred Strategy Consultation: Summary of Representations**

4 letters of objection were received which are summarised below:

- The Felindre site sits in the community of Llangyfelach and should be renamed accordingly and services provided for the community of Llangyfelach
- Roads are already busy in the vicinity and increase traffic volumes would put too much pressure.
- Rail links should be considered
- Need to carefully consider infrastructure needs
- Impact on Welsh language
- Concerns over expansion into green areas and impact on habitats

### LDP Draft Proposals Map Consultation: Summary of Representations

3 letters of objection received which are summarised as follows:

- Disappointed no change made to proposed development of greenspaces considering that a wildlife rich environment will be ruined.
- Area is haven of woodland and meadows.
- Risk of losing our most valuable wildlife and habitats, this area is crucial to maintain biodiversity.
- Unwelcome visual impact, noise and light pollution.
- Diminished quality of life.
- Roads would not cope with increase in traffic
- Adjacent Ancient Semi Natural Woodland

### Response to Representations

- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- Site is located to west of the Strategic Business park site and would involve the development of housing, community facilities, local shops and open space as part of a new sustainable settlement. The settlement would need to meet its own needs (e.g. new school and infrastructure provision)
- There is no highway authority objection but sustainable modes of transport will be encouraged and facilitated and improvements made to the nearby strategic highway network
- The site is low grade (4) agricultural land and not making any significant contribution to the local economy
- There is no residential development surrounding the site, so it could not be considered to be overdeveloped and there is no evidence to suggest a causal relationship between new build and increased crime levels
- Mitigation measures/legislation will ensure any pollution arising from development activity or future occupation is kept within acceptable levels



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- Important species and habitats will need to be safeguarded and relevant areas protected. This is a matter for further survey at planning application stage when details of proposed development are known and appropriate mitigation measures can be put in place
- There is no evidence to indicate a causal relationship between new development and increased crime rates. South Wales Police are fully consulted during the LDP preparation process and crime prevention measures will be considered as part of the design process accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution.
- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account Any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA)
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- The Council commissioned Peter Brett Associates to undertake an Economic Assessment and Employment Land Provision study in March 2012. The study provides a detailed evidence base for understanding the current supply in the market of employment land and buildings, as well as the requirements for future demand. The study indicates there is a sufficient supply of lower grade units within the County but identifies a requirement to bring forward higher quality facilities at key locations and to focus on regenerating land to provide strategic employment areas at Felindre, Fabian Way and Swansea West.

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- The Council will continue to work with the key development partners to produce a detailed masterplan for the strategic site which will consider the issues raised through the consultation process. Accept there is a need to identify an appropriate name for this location which clearly distinguishes it from the village of Felindre
- It is a Welsh Language Sensitive Area and a study of the implications of any development on the Welsh language will be required

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access is established from Bryntywod and the new road north of the site.</p> <p><u>Local Highway Conditions:</u> Peak time congestion at Junction 46.</p> <p><u>Accessibility:</u> There is a 60 min frequency bus service 560m from the southern site entrance and a less than 2 hourly service north of the site.</p> <p><u>Wider Issues / Combined effect:</u> Peak time congestion at J46.</p> <p><u>Restrictions:</u> Subject to detailed assessment.</p> <p><u>Transport Proposals:</u> Outline consent has been granted and highway improvements identified.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4,700 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>Species-rich Purple Moor-grass and Rush pasture, Upland Mixed Ash Woodland, Relatively-rich Neutral grassland and potentially important hedgerows protected under HR. Purple Moor-grass and Rush pasture and Upland Mixed Ash Woodland are habitats of principal importance for the conservation of biological diversity in Wales under NERC.</p>

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	<p>Recorded on the site are; Bullfinch, Reed Bunting, Tree pipit, Lesser redpoll, Song Thrush, Willow tit, Shoulder-striped wainscot, Dingy skipper, Small square-spot, White ermine, Buff ermine, Knot grass, Dusky brocade, Broom moth, Minor shoulder-knot, Small pearl-bordered fritillary, Wall brown, Small phoenix, The cinnabar, Dusky thorn, Small heath, Rosy rustic, Autumnal rustic, The sallow, Green Brindled crescent, Dusky thorn are species of principal importance for the conservation of biological diversity in Wales under NERC.</p> <p>Species of contributory concern; Green woodpecker, Stonechat, Goldcrest, Black-headed Gull, Snipe, Keeled Skimmer, Golden-ringed Dragonfly, Emerald Damselfly</p>
CCS Environmental Health	Adj former Felindre tinplate - site 112
CCS Education	<p><u>Llangyfelach Primary</u>: Is a relatively small school on a restricted site with limited scope for expansion. New school requirement for this development</p> <p><u>Pontarddulais Comprehensive</u>: Is at capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>MOU.</p> <p>There are records of: bat species, otter, badger and marsh fritillary within this wider Strategic site area. Phase 1 and Phase 2 maps indicate that there are significant areas of habitat within this larger parcel. This could be of BAP value or higher. Includes: semi-improved grassland, marshy grassland and broadleaved woodland. Semi-improved/marshy grassland, with small areas of scrub/woodland.</p>

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	<p>Contaminated Land-Felindre Steelworks. Pollution Controls &amp; mitigation measures advised.</p> <p>Part of site lies within Zones C2 &amp; Zone B.</p>
<p>Dwr Cymru</p>	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, a hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Sewerage:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

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	<p><u>Site Specific Comments on the Draft Proposals Map</u>: Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	<p>There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.</p> <ul style="list-style-type: none"> <li>• National Grid Policy is to retain our existing overhead lines in-situ.</li> <li>• Preference that buildings not built directly beneath overhead lines due to amenity of potential occupiers and need easy access for maintenance.</li> <li>• Statutory safety clearances must not be infringed. To comply with statutory safety clearances overhead power lines are designed to minimum height above ground.</li> <li>• Do not object to development in area surrounding substation sites, take this opportunity to highlight that substations are vital to the efficient operation of our electricity network.</li> </ul>
Coal Authority	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth/Shallow – Recorded shallow coal workings. Approximately 3 mine entries at south.</p>
Llangyfelach Community Council	<p>The Council has no objections to the proposed use of this site as a Strategic Business Park. The Community Council, however, strongly objects to the additional proposed residential employment of 300 to 500 units and ancillary retail uses stipulated by the agent for the Welsh Assembly Government. Any residential development of this size would have an adverse effect on the provision of education facilities which are already stretched.</p>
Councillor Gareth Sullivan	<p>Again I would reiterate that any development on the scale indicated should be the subject of a rigorous traffic impact study to assess the impact on the current road network system.</p> <p>I would draw your attention to the logistical problems that exist of surface and foul water disposal on the site.</p>

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	n/a	+2	+2	+2	?	-2	n/a	+2	+2	+1	n/a	+2	+2	0	n/a	-2	-1	-2	-2	n/a	?	+2	+2

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	++	--	?	++	0	+/-	++	0	?	-	-	+/-	?	-	-	x	-	?	?	--	-	-

KEY TO LAND USE FRAMEWORK

- Land ownership
- Housing
- Primary school
- Employment
- Energy production
- Social/community
- Retail/leisure
- Main circulation routes
- Existing woodland
- Existing watercourses/bodies
- Listed buildings
- Green infrastructure
- Retained Rhos pasture
- Retained farmland
- Village green
- Bus stops
- Pedestrian/cyclist share routes

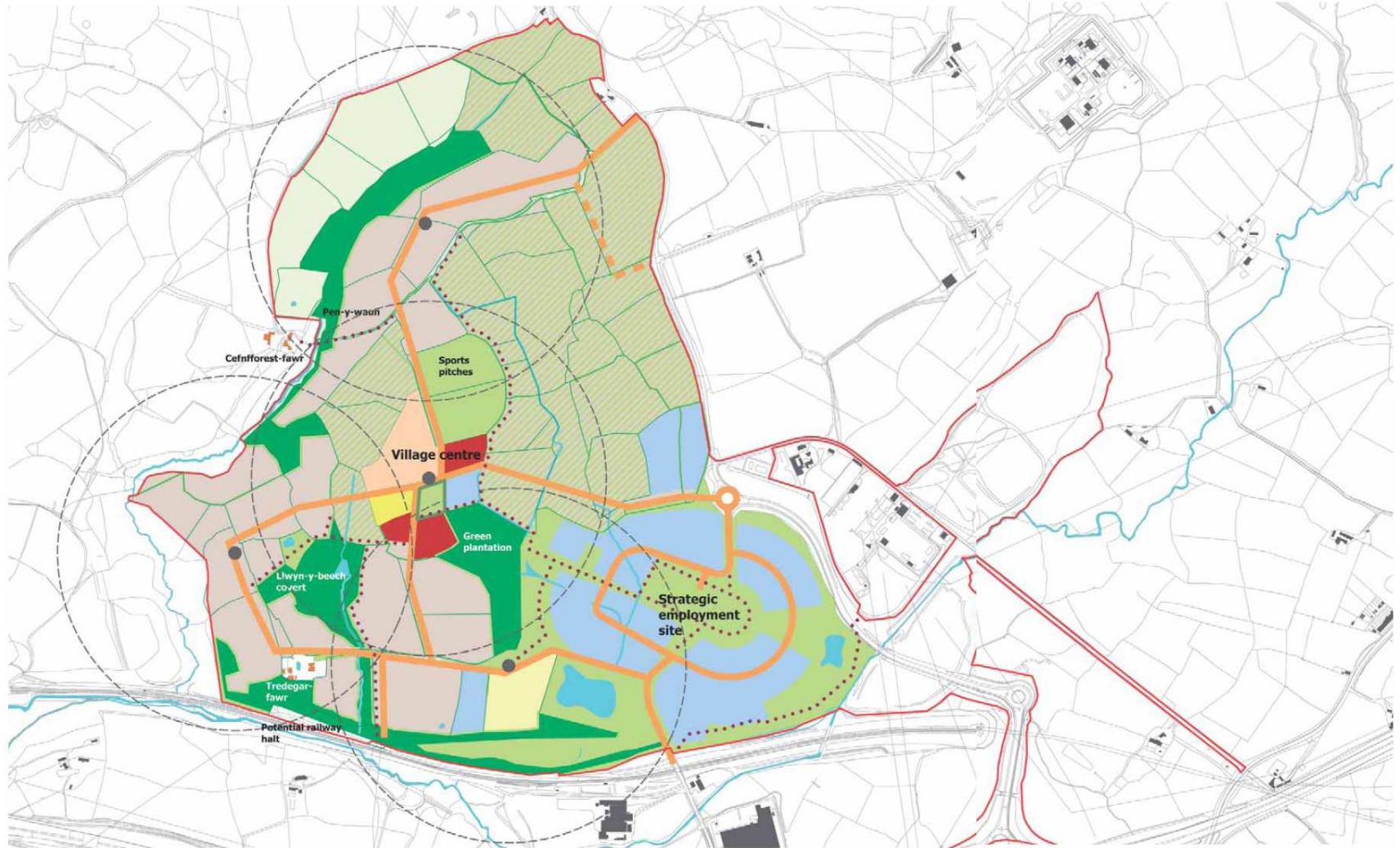
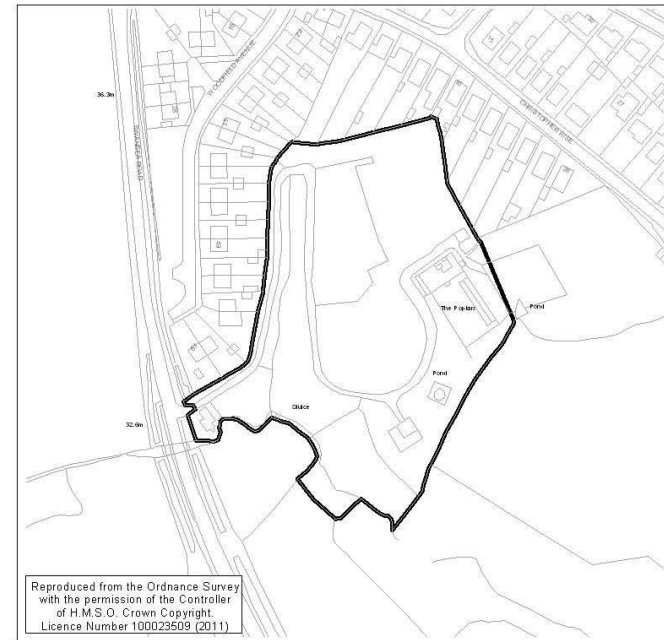


Figure 4 Land use framework



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<b>Reference</b>	<b>LF011</b>
<b>Name</b>	<b>The Poplars, Pontlliw</b>
<b>Description</b>	Large irregular shaped residential curtilage on the southern edge of Pontlliw. Currently falls outside settlement boundary. It is a heavily wooded site. Outline planning permission for 11 units has recently been granted on land immediately to the east.
<b>Size</b>	2.063 Ha
<b>Existing Land use</b>	Residential Dwelling and Associated Land
<b>Proposed Land Use</b>	Residential Development
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

10 letters of objection were received which are summarised below:

- Part of site already subject to planning application ref. 2009/1435
- Contrary to current policy
- Previous objections to this site (UDP comments) still relevant
- Increased traffic and inadequate roads
- Highway safety
- Local schools at capacity
- Increased pollution
- Loss of habitat
- Adverse impact on character and amenity
- Would not integrate and enhance the landscape
- Increased noise pollution
- Inappropriate proposed site access

### **LDP Preferred Strategy Consultation: Summary of Representations**

1 comment received

- General support is given to where development could occur in other settlements in the Greater North West Swansea Zone and that such development could contribute towards creating more sustainable communities. However, consider that Pontlliw should be referred to in this context with residential development of the Poplars site not extending the physical built up settlement boundaries further south but instead rounding off the village in this location.

### LDP Draft Proposals Map Consultation: Summary of Representations

2 letters of objection were received which reiterated previous comments made and the following additional observations:

- The Woodland Trust state that there is Ancient Woodland within the site (Ancient Semi Natural Woodland).
- There is no demand.

1 letter of support received from site promoter which may be summarised as follows:

- Confirmation of commitment to facilitate development within the LDP period.
- There is potential to re-plan The Poplars and Christopher Rise sites together and accessed via Swansea Road.
- Drainage could be accommodated within Christopher Rise proposals.
- An arboriculture assessment is being considered to determine constraints.

### Response to Representations

- Planning application 2009/1435 relates to Land to the side of 28 Christopher Rise, not this site.
- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan.
- No objection raised by Highway Authority. Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site. The council have commissioned a Strategic Highway Network Assessment which will inform the detailed masterplanning process.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.

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- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. When wider issues need to be taken into account. Any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA). Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries.
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control.
- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: Access is possible from Christopher Rise and has been consented previously.</p> <p><u>Local Highway Conditions</u>: Peak time congestion at Junction 46. Restricted access from Oaklands Road leading to Christopher Rise.</p> <p><u>Accessibility</u>: There is a 30 min frequency bus service 370m from the site entrance.</p> <p><u>Wider Issues / Combined effect</u>: Peak time congestion at J46 and limitation on approach roads to the site.</p> <p><u>Restrictions</u>: Subject to detailed assessment. Access improvements will be required and will likely need consideration of a mini roundabout at the access point.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4700 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site contains mature trees and scrub, which have the potential for associated protected fauna. Extended phase1 habitat survey to determine the habitats classifications, species list and for the presence of protected species. Important features highlighted may require further survey.</p>
CCS Environmental Health	No comment
CCS Education	<p><u>Pontlliw Primary</u>: School is at capacity. There are difficulties in developing the small village site any further. To take the increased pupil numbers generated, investment would be required</p> <p><u>Pontarddulais Comprehensive</u>: School is at capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>

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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>MOU.</p> <p>BAP Habitat. A mixture of grasslands and woodlands with numerous mature trees. Site has the potential to support bat species. Part of the woodland within the site may be classified as Ancient Semi-Natural Woodland (ASNW).</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, a hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Sewerage:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development. Proposals for site ref LF004, LF008, LF0018 and LF006 will impact on our Cuckoo Mill Sewage Pumping Station. An assessment of this SPS will be required to understand the extent of improvements required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

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	<p><u>Site Specific Comments on the Draft Proposals Map:</u> There are incidents of pollution at a CSO downstream of this site. There is no improvement scheme in our current AMP programme. Potential developers can either wait for a DCWW AMP scheme to resolve this issue or alternatively can progress the site through the sewerage requisition provisions of the Water Industry Act 1991 or Section 106 of the Town &amp; Country Planning Act 1990.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy –PRUG – Unrecorded probable historic underground workings at shallow depth
Pontlliw Community Council	There has been a significant amount of development within the boundary of this Community Council. Against Policies EV17 and EV20. Site LF0005 onto Carmel Road which is a country lane incapable of supporting the additional volume of traffic. Sites LF0011 and LF0012 have previously either sought to be included in the UDP or are the subject of an existing application for permission. The Community Council previously made representations about the proposed development which are still relevant. Site LF0007 has also previously been rejected. Penllergaer School is full. The increase in traffic, particularly at peak times, is noticeable and significant.
Councillor Gareth Sullivan	<p>Last year a planning application for this site was approved for the development of 11 dormer or single storey properties. The decision was made despite the objections of residents.</p> <p>The road network leading to the site will not be able to cope with the increased traffic that would be generated by the development of a further 15 properties.</p> <p>It is also questionable whether the surface water and drainage system is adequate for such an expansion.</p>

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**Stage 3A: Assessment Against LDP Objectives**

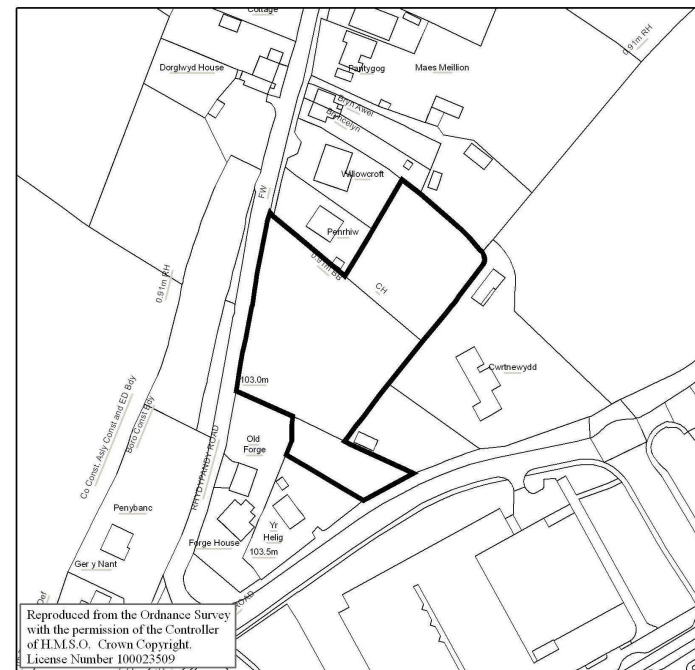
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	0	n/a	?	-1	n/a	+1	0	n/a	n/a	n/a	+1	0	n/a	-1	-1	-1	-1	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	?	+	0	?	+	-	+/-	?	-	+/-	x	+/-	?	?	-	-	?

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<b>Reference</b>	<b>MR011</b>
<b>Name</b>	<b>Land at Rhyd y Pandy Road, Pantlasau</b>
<b>Description</b>	3 irregular shaped agricultural fields fronting onto Pant Lasau Road and Rhyd-y-Pandy Road. This level site is surrounded by residential properties and by Morryston Hospital further to the south. There is mature vegetation around the site boundaries. Previously open countryside in the UDP, but now proposed to be incorporated within an expanded settlement boundary. Site fell within Morryston ward at time of original candidate site submission, but due to ward boundary changes now lies within Llangyfelach ward.
<b>Size</b>	0.7Ha
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential (approx 13 units)
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices

14 letters of objection were received which are summarised below:

- Previous planning permissions and applications for inclusion in UDP have all failed, no change in circumstances
- Loss of green space
- Designated green wedge
- Increased traffic on already busy roads and main access route to hospital
- Encroachment into open countryside
- Loss of agricultural land
- Detrimental to character and amenity
- Adverse visual impact
- Prone to flooding
- Adverse impact on wildlife/habitat
- Undesirable precedent
- Inappropriate size and scale
- Will not provide affordable housing
- Inadequate utility supplies
- Inadequate sewerage system
- Houses would be directly under flight path of the Air Ambulance
- Local schools near capacity
- Outside existing settlement boundary

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site

## LDP Draft Proposals Map Consultation: Summary of Representations

No comments were received specifically regarding this site

## Response to Representations

- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- Green wedges unlike Green Belts are only temporary in nature and around 40% the new housing to be allocated in the LDP will have to be on land currently designated as green wedge, as there is insufficient land available within existing settlement boundaries to meet all future demand. Each site is looked at on its individual merits and does not set a precedent as all policy is being considered anew
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site
- The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land
- Sustainable urban drainage scheme (SUDS) will need to be incorporated into development schemes as necessary. All new development needs to demonstrate that greenfield run –off will be achieved. No increase in surface water run-off would be permitted

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- Vulnerable development such as residential may not be allocated in flood risk zones. All flood risk areas have been identified and excluded from consideration for development purposes. Incidents of localised surface water flooding have also been identified and any sites allocated at or near such areas will be required to incorporate appropriate remedial measures. Sustainable urban drainage scheme (SUDS) will be incorporated into development scheme as necessary. New development must demonstrate greenfield run off - no increase in surface water run-off will be permitted
- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA). Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries
- Insufficient information to be able to judge density and scale at LDP allocation stage. This is a matter dealt with through the planning application process. Any development would need to be in keeping with context of adjoining development
- Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. There is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements
- All relevant utility providers have been consulted and no significant utility constraints have been identified
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. In West Swansea an ageing population profile and limited opportunities for new build housing/ under occupation of housing by increasingly elderly population will likely see a reduction in demand for school places from within existing catchments

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: The site fronts onto Rhydypany Road and Mynydd Gelliwastad Road. Access is possible from either frontage</p> <p><u>Local Highway Conditions</u>: Peak time traffic congestion on the wider highway network may be an issue and the roads leading to the site are rural in nature. No footways are present along the site frontage</p> <p><u>Accessibility</u>: There is a 10 min frequency bus service past the site</p> <p><u>Wider Issues / Combined effect</u>: Peak time traffic congestion is an issue in the locality</p> <p><u>Restrictions</u>: Assessment of the affect of development traffic on peak time congestion will need to be undertaken. Footway provision is necessary and the rural nature of the access roads may limit development potential of the site</p>
CCS Housing	The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period
CCS Biodiversity	This site contains scrub, hedgerows and mature trees. Hedgerows are protected under the Hedgerow Regulations (1997). A survey for the presence of protected species needs to be carried out and a hedgerow assessment would need to be undertaken to determine the hedgerows quality. Important features highlighted may require further
CCS Environmental Health	No comments obtained
CCS Education	<p><u>Llangyfelach Primary</u>: Is a relatively small school on a restricted site with limited scope for expansion.</p> <p><u>Pontarddulais Comprehensive</u>: Is at capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments (further consideration could be given to redesignating primary feeder schools to another comprehensive or consider links to Carmarthenshire as this Comprehensive is already picking up pupils from that LA)</p>

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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	No comments
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth
Coal Authority	No comments
Llangyfelach Community Council	This site has road frontages to Rhyd Y Pandy Road and Mynydd Gelli Wastad Road. The proposed development of the site is situated in the Pant Lasau green wedge and would be contrary to Policy EV23 of the UDP and would also result in the loss of established trees and privacy to the properties fronting Mynydd Gelli Wastad Road. A planning application for a single detached property was refused on this site on 31 January 2006 (planning application No. 2005/0481). The Council therefore considers this site should NOT be included in the proposed Local Development Plan for residential use.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-1	n/a	+2	0	n/a	n/a	n/a	+1	0	n/a	-1	+1	-1	-1	n/a	?	+1	+1

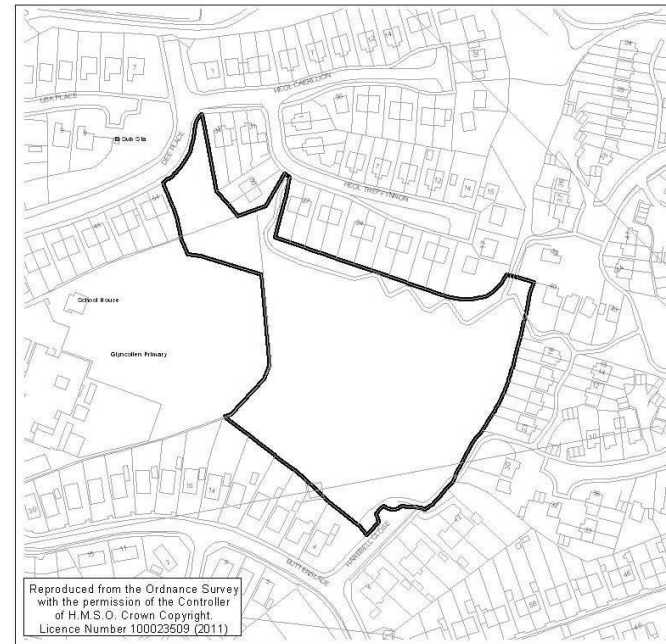
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Stage 3B: Assessment Against SEA/SA Objectives

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	?	+	0	?	+	-	+	?	++	+/-	x	+	?	?	--	+	?

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<b>Reference</b>	<b>MR015</b>
<b>Name</b>	<b>Land at rear of Glyncollen Primary School, Morriston</b>
<b>Description</b>	Urban greenspace with environmental enhancement opportunities adjoining eastern side of Glyncollen Primary School. The site is also bounded by residential properties along Radnor Drive to the east, Butterslade Grove to the south and Heol Treffynnon to the north. HV overhead line crosses the southern boundary of the site and a lattice tower support is located to the rear of properties on Butterslade Grove. This tower has consent to be relocated adjoining Harbell Close entrance to the site
<b>Size</b>	1.7Ha
<b>Existing Land use</b>	Open Greenspace with Woodland
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices

45 letters of objection were received which are summarised below:

- Loss of recreational space
- Safe school route for children
- Increased traffic on already busy roads
- Adverse impact on wildlife/habitat
- Underground streams, if disturbed may cause flooding
- Green belt
- Proposed entrance point for site on Harbell Close conflicts with the proposal to move and lift the pylon that carries the overhead lines
- Adding more houses to existing sewerage system could lead to further drainage issues
- Increased noise
- Loss of privacy
- Local school overcrowded
- Additional strain on local services
- Devaluation of property
- Adverse impact on crime and anti-social behaviour
- Increased pollution
- Adverse impact to local residents/quality of life
- Inappropriate site access
- Public Right of Way
- Area has historic value
- Adverse visual impact
- Highway safety
- Oil and water pipes running through site



- Protected trees on site
- Educational resource used by local school
- Should be no net loss of woodland to ensure ecological networks are maintained and enhanced
- Buffer zones are essential to reduce damaging edge effects and ensure that their sustainability is to be improved

1 letter of support was received which is summarised below:

- Would welcome affordable housing

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site

### **LDP Draft Proposals Map Consultation: Summary of Representations**

1 letter of objection was received which is summarised below:

- The area is already saturated with traffic throughout the day and the infrastructure would not cope with any increase
- This area is also home to over 20 Oak trees and Sycamore trees which would need to be felled to create this potential development
- This area has a lot of underground streams which if disturbed would flood the properties that back on to this green land
- This area has been used recreationally by locals for over 50 years

### **Response to Representations**

- Site forms part of the urban greenspace system – it is not Green Belt land

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- No highway objection in principle but further assessment needed of the affect of more detailed proposals on peak time congestion. There are two potential points of access which are considered suitable on highway grounds. The proposed relocation of the pylon would need to be taken in any detailed assessment relating to future layout and means of access
- Surplus capacity at Comp school. No current surplus at primary but potential to increase through development funding replacement of substandard demountables. No requirement for expansion of adjoining primary school to provide additional land for education purposes
- DCWW have no drainage/sewer capacity concerns
- Scrub and mature trees have the potential for associated protected flora and fauna and ecological studies will be required if proposals for development of the site are progressed
- TPO protected trees/features of historic importance would need to be retained
- PROW crossing site would need to be retained and as part of any development proposal and to retain a safe route to schools
- Utilities infrastructure expected to be crossing underneath site and would be used/diverted to serve any new development
- Any new development would be required to achieve greenfield run off rates (i.e. not cause any surface water flooding)
- Key issue is impact on greenspace provision – need to ensure minimum FIT and accessible open space standards are maintained
- Devaluation of property is subjective and not a material planning consideration
- Any new development would be built to design out crime in accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- Compliance with the Council's adopted design guidance for new residential development would ensure there is no loss of privacy or pollution issues arising (waste, light, noise, etc) <http://www.swansea.gov.uk/spg>
- Local health authority have not identified any capacity issues at local medical practices. New development helps to sustain local services and/or provide additional funding. Not a constraint to development
- The viability of affordable housing provision is considered for all new development sites

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> There appears to be potentially two points of access. Dee Place to the north and Harbell Close to the south</p> <p><u>Local Highway Conditions:</u> Peak time traffic congestion may be an issue</p> <p><u>Accessibility:</u> There is a 2 hourly frequency bus service 40m from the site</p> <p><u>Wider Issues / Combined effect:</u> Peak time traffic congestion is an issue in the locality</p> <p><u>Restrictions:</u> Assessment of the affect of development traffic on peak time congestion will need to be undertaken to determine any necessary restriction on development</p> <p><u>Transport Proposals:</u> None identified</p>
CCS Housing	<p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone (North) over the LDP period</p> <p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p>
CCS Biodiversity	<p>The area contains scrub and mature trees, which may fall into the SINC category of Diverse scrub. Scrub and mature trees have the potential for associated protected flora and fauna. An extended phase1 habitat survey to determine the habitats, species and for the presence of protected species. Important features highlighted may require further investigation</p>
CCS Environmental Health	No comments
CCS Education	<p><u>Glyncollen Primary:</u> Limited surplus capacity. Extension provided 2014 to remove temporary accommodation. An increase in pupil numbers will leave the school with No Surplus capacity</p> <p><u>Morrison Comprehensive:</u> New build has been completed. There is some capacity to take increase in pupil numbers, however all the developments proposed for Morrison catchment will take this school over capacity. Therefore investment required</p>
External Stakeholder	Comments
Natural Resources Wales	<p>Aerial photographs suggest BAP Habitat comprising of: woodland, grassland and scrub. Likely to support and provide foraging for bats. Site provides good connectivity. A PRoW crosses the north-west corner of the site</p> <p>Groundwater vulnerability</p>

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Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substation, which may be able to accommodate future load growth
Coal Authority	No coal mining legacy features identified by the Coal Authority.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	+1	n/a	+1	0	n/a	n/a	n/a	+1	0	n/a	-1	0	-1	-1	n/a	?	+1	+1

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**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	+	+/-	0	?	+/-	-	?	?	?	+/-	x	+	?	?	++	?	?

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<b>Reference</b>	<b>MR017</b>
<b>Name</b>	<b>Brayley Road, Vicarage Road, Morriston</b>
<b>Description</b>	Existing undeveloped UDP housing allocation off Brayley Road, Morriston. This irregular shaped site is bounded by residential properties to the north off Vicarage Road, east off Brayley Road and to the south off Bishop's Walk. It is primarily a backland site with a short length of frontage to Brayley Rd. Clearance works have historically occurred in accordance with an expired planning permission for 17 dwellings but no building works have commenced on site.
<b>Size</b>	0.7 Ha
<b>Existing Land use</b>	UDP Allocation
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices

2 letters of comment were received which are summarised below:

- Development is very welcomed, however no progress has been made whatsoever in 4 years, the condition and lack of site maintenance is unacceptable

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site

### **LDP Draft Proposals Map Consultation: Summary of Representations**

No comments were received specifically regarding this site

### **Response to Representations**

- The principle of residential development at this site is well-established and actively encouraged, however implementation has been delayed due to market conditions. There is scope for the Council to serve notice on the landowner to tidy up the site, but there is no action that can be taken to enforce delivery of a scheme

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access can be constructed from Brayley Road. Site gradients will dictate development potential</p> <p><u>Local Highway Conditions:</u> Peak time traffic congestion may be an issue</p> <p><u>Accessibility:</u> There is a 30 min frequency bus service 30m from the site</p> <p><u>Wider Issues / Combined effect:</u> Peak time traffic congestion is an issue in the locality</p> <p><u>Restrictions:</u> Assessment of the affect of development traffic on peak time congestion will need to be undertaken to determine any necessary restriction on development. Also site topography issues will need to be overcome</p> <p><u>Transport Proposals:</u> None identified</p>
CCS Housing	<p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone (North) over the LDP period</p> <p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p>
CCS Biodiversity	No comments
CCS Environmental Health	Site lies on site 198 former Morriston quarry: site investigation condition
CCS Education	<p><u>Pentre Graig Primary:</u> Remodelling proposed under Band A QED Programme. However there are issues with access at this school. The aspiration would be to find a greenfield site for this new school.</p> <p><u>Morrison Comprehensive:</u> New build has been completed. There is some capacity to take increase in pupil numbers, however all the developments proposed for Morrison catchment will take this school over capacity. Therefore investment required.</p>
External Stakeholder	Comments
Natural Resources Wales	Groundwater vulnerability



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Dwr Cymru	<p><u>Water Supply:</u> Initial Comments for Candidate Sites in the Ward: The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth
Coal Authority	No coal mining legacy features identified by the Coal Authority.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+2	n/a	?	+2	n/a	+2	0	n/a	n/a	n/a	+1	0	n/a	+2	+1	+1	+1	n/a	?	+1	+2

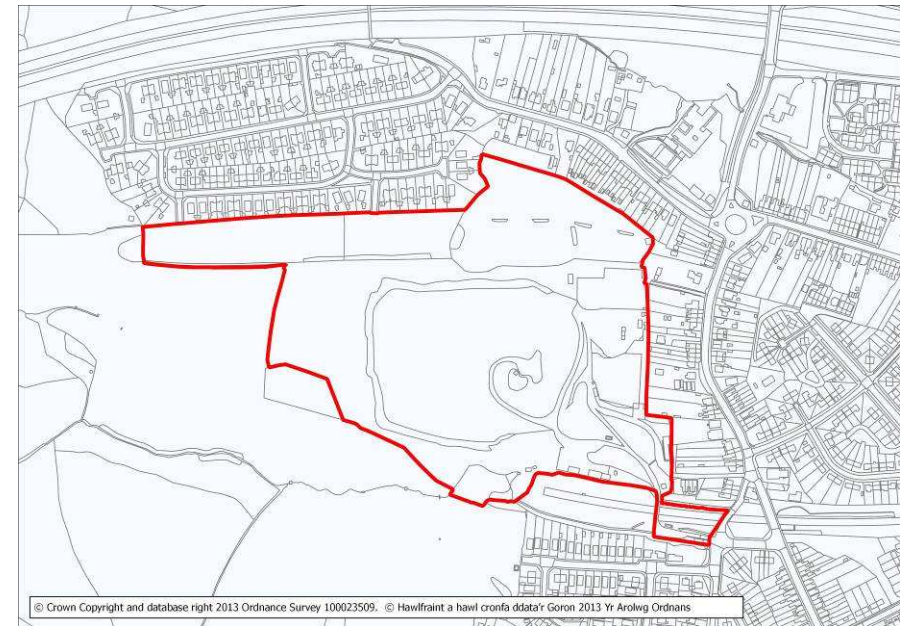
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Stage 3B: Assessment Against SEA/SA Objectives

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	++	?	+	0	+	+	0	?	++	+	+	?	?	+/-	x	+	?	?	++	0	+

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<b>Reference</b>	<b>MR019 (Incorporating MR009, MR010 and additional land)</b>
<b>Name</b>	<b>Land at Cwmrhydyceirw Quarry</b>
<b>Description</b>	Agricultural land bounded by residential properties along Brodorion Drive/Enfield Close to the north, includes a sandstone quarry to the south east and Morrison Golf Course to the south west. The site forms part of a current planning application as part of a wider development area and access would be provided via Enfield Close/Maes Y Gwernen Road/Cwmrhydyceirw Road. MR019 was created following the integration of both MR009 and MR010 into a wider development area
<b>Size</b>	14.17ha
<b>Existing Land use</b>	Agricultural land, urban greenspace and a disused quarry
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

**MR009:** The Candidate Site application was advertised on site in the form of site notices. 6 letters of objection were received which are summarised below:

- Loss of green wedge
- Estate has the motorway to one side and landfill site
- Small stream runs through site
- Loss of recreational space
- Adverse visual impact
- Adverse impact on amenity
- Landfill introduces constraints due to consideration to landfill gas issues
- Only access via single route - Maes Y Gwernen Road cul-de-sac
- Increased traffic
- Increased pollution
- Highway safety
- Adverse impact on landscape character
- Loss of privacy
- Adverse impact on wildlife
- Loss of agricultural land
- Inadequate road infrastructure

**MR010:** The Candidate Site application was advertised on site in the form of site notices. 5 letters of objection were received which are summarised below:

- Adjacent landfill site and is within the 250m restriction on the land being used for housing
- Adverse impact on wildlife and habitat
- Protected trees
- Only access via single route - Maes Y Gwernen Road cul-de-sac
- Highway safety
- Increased traffic
- Increased pollution

- Designated green wedge
- Loss of recreational space
- Adverse impact on landscape character
- Adverse visual impact
- Loss of privacy
- Loss of agricultural land
- Inadequate road infrastructure

#### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site

#### **LDP Draft Proposals Map Consultation: Summary of Representations**

Both MR009 and MR010 were integrated into a wider development area which evolved into creating MR019

1 letters of objection received which is summarised below:

- There are many questions about the safety of the quarry by using it within the development and any acceptance on the new amendments would be harmful to the environment. The additional traffic that this would cause seems to be getting overlooked and we will end up with no green space or attract any wildlife into the community but making it a concrete village

#### **Response to Representations**

- Site is not green wedge, it forms part of the existing urban settlement
- Site is white land in the UDP i.e. potentially available for development but awaiting constraints associated with adjoining quarry to be overcome- would need to be addressed as part of any development proposal
- Any potential safety issues with the redevelopment of the quarry will be dealt with at the planning application stage and would be endorsed by all of the statutory undertakers

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- The land is not formal recreational or open space. Any existing deficiency of ‘Fields in Trust’ (FiT) or accessible natural greenspace (ANGS) provision in the locality will need to be addressed through new development
- No highway objection to access from Enfield Close or on highway safety grounds. Further assessment of traffic congestion in wider area needed
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site
- Low grade agricultural land and low LANDMAP landscape value
- Compliance with the Council’s adopted design guidance for new residential development would minimise visual impact and ensure no loss of privacy/amenity or pollution issues arising (waste, light, noise, etc)
- Site contains protected hedgerows which would need to be retained for their biodiversity value. Open agricultural fields have low wildlife value
- Any development proposal would need to achieve greenfield run off rates and address any existing surface water flooding issues

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site is shown to abut highway at Vicarage Road, Enfield Close and Brodorian Drive</p> <p><u>Local Highway Conditions:</u> Traffic congestion and local road safety issues are present, particularly adjacent to nearby schools</p> <p><u>Accessibility:</u> There is a two hourly service along Brodorian Drive past the site and a 10-15 min service 600m away at Llanllienwen/Chemical Road roundabout</p> <p><u>Wider Issues / Combined effect:</u> Traffic impact of developments in the area will need to be considered due to peak time congestion and localised road safety issues</p> <p><u>Restrictions:</u> This will be governed by the outcome of formal assessments</p> <p><u>Transport Proposals:</u> Local highway safety improvements on walking routes to schools</p>
CCS Housing	<p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone (North) over the LDP period</p>

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CCS Biodiversity	Site has been surveyed and there are some ecological constraints
CCS Environmental Health	Potential Contaminated Land concerns as this site is on or within 250m of a site identified as being previously contaminated. Further consultation from Pollution Control required depending on proposed site use
CCS Education	<p><u>Cwmrhydyceirw Primary</u>: This school has no capacity. Any increase in pupil numbers would require investment.</p> <p><u>Morrison Comprehensive</u>: New build has been completed. There is some capacity to take increase in pupil numbers, however all the developments proposed for Morrison catchment will take this school over capacity. Therefore investment required</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	Pre Deposit Consultation: Support subject to recent planning application consultation
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: The proposed development site is in an area where there are water supply problems for which there are no improvements planned within our current AMP Programme. In order to establish what would be required to serve the site with an adequate water supply, an assessment on the water supply network will be required.</p> <p><u>Waste</u>:</p> <p>Initial Comments for Candidate Sites in the Ward: Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time</p>

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	<p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth and mine entry at east

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	+1	+1	n/a	?	-1	n/a	+2	0	n/a	n/a	n/a	+1	0	n/a	0	+1	-1	-1	n/a	?	+1	+1

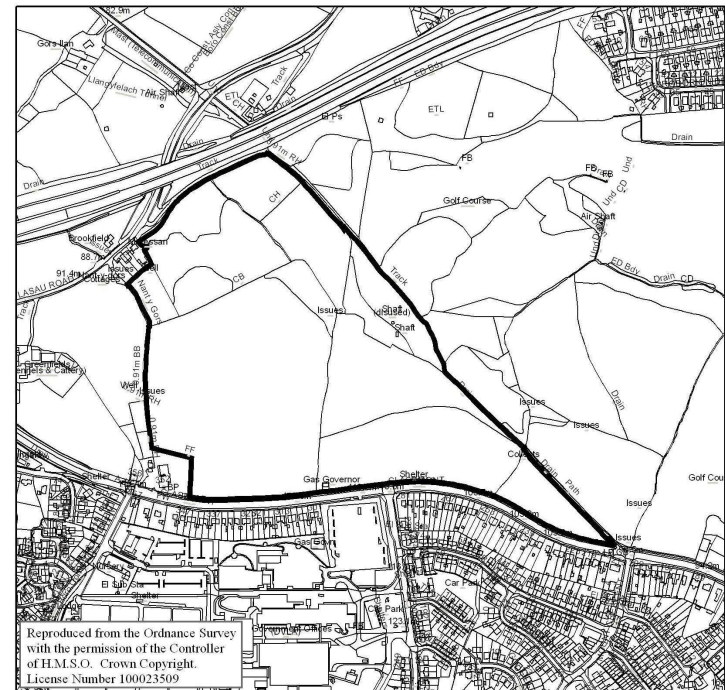
**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	+/-	+	0	+	+	0	?	+/-	+/-	+	?	?	+/-	x	+	?	?	--	?	+/-



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<b>Reference</b>	<b>MB005 (partly in Llangyfelach Ward)</b>
<b>Name</b>	<b>Land off Clasemont Road, Morryston</b>
<b>Description</b>	Extensive wedge –shaped area of land comprising a number of field parcels sloping down between Clasemont Road and the M4 west of Morrison Golf Club. Approx 15ha is being proposed for development as part of strategic site release for up to 750 primarily terrace style dwellings, plus new build primary school and some mixed commercial uses fronting Clasemont Rd and a nature reserve/wetland area to the north abutting the motorway
<b>Size</b>	21.5 Ha
<b>Existing Land use</b>	Agricultural
<b>Proposed Land Use</b>	Residential and Local Wildlife Area
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

12 letters of objection were received which are summarised below:

- Increased traffic on already congested roads
- Main access route to crematorium, Morriston hospital and DVLA
- Loss of green space
- Already overcapacity of residential properties
- Loss of agricultural land
- Old mine workings including capped mine shafts on site
- Adverse visual impact
- Highway safety
- Lack of local services e.g. schools, medical practices and utilities etc.
- Adverse impact on wildlife/habitat
- Increase pollution
- Possible flood risk
- Inappropriate size and scale
- Three streams on site and land is essentially wet
- Loss of open space
- Possible increase in crime
- Would seriously affect quality of life
- Provides a significant 'green lung' in the area

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### LDP Draft Proposals Map Consultation: Summary of Representations

32 letters of objection were received which are summarised below:

- increased traffic onto the busy, heavily congested Clasemont Road – causing safety issues and further delays to those already associated with DVLA and Morriston Hospital
- Increased traffic will increase pollution
- Inadequate highways surrounding the site
- The land forms a green wedge between communities.
- Local services already oversubscribed
- Infrastructure unable to cope with population increase
- Local schools are overflowing
- Provision for secondary school children unclear
- Impact on/loss of greenspace and wildlife
- Suggested wildlife conservation area is patronising
- Local flooding issues

### Response to Representations

- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- Green wedges unlike Green Belts are only temporary in nature and around 40% the new housing to be allocated in the LDP will have to be on land currently designated as green wedge, as there is insufficient land available within existing settlement boundaries to meet all future demand.
- Acknowledge traffic congestion is an issue along the frontage and leading to J46 at peak times and also at Morriston cross. A full Transport Assessment is required to determine affect on local congestion issues. With regard to highway safety, access will need to be carefully located and will likely require a right turn lane. Individual plot access directly from Clasemont Road frontage should be avoided. No major constraints identified.

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- Its development would not constitute a loss in Fields in Trust provision. Opportunity to make parts of the land accessible open space as part of the development. Site is not classed as Accessible Natural Greenspace and its loss would not result in a deficiency of provision.
- The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period. There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.
- The site is grade 4 agricultural land. There is no indication that the sites loss would undermine the viability of the farm holding.
- As part of any development proposal being brought forward, a ground conditions survey would need to be undertaken on this site in order to ensure all evidence of ground instability/former mining activity is identified.
- Any development would need to comply with adopted residential design guidance SPG. <http://www.swansea.gov.uk/spg> which seeks to encourage and support the creation of more sustainable communities and addresses issues such as size, scale, density and visual and environmental impact.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- The site is located more than 1 km from local services. Development of this scale would necessitate the provision of local services, facilities and infrastructure in order to develop new sustainable communities.
- No major constraints identified. This site contains Species-rich Purple Moor-grass and Lowland Mixed Deciduous Woodland, which are habitats of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006). Proposed development seeks to mitigate ecological impact, retaining some of area as a nature reserve. Public open space, paths and cycleways will also be included within the development.
- No indication of significant pollution (including noise) issues. The planning application process would not permit development that would result in harmful levels of pollution.
- Some surface water flooding identified, but not a major constraint. All new development needs to demonstrate greenfield run-off. No increase in surface water run-off would be permitted. Mitigation measures required in the drainage design to minimise impacts on the hydrology of the wetland areas. Attenuation ponds connected to the wetlands are recommended by the supporting Hydrogeological Study.
- Any new development would be built to design out crime in accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>

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- Development may improve quality of life for residents by providing a range and choice of houses to enable people to stay within the community, improve community facilities/services, contribute to new open space provision and establish a new sustainable community in the area.
- The proposed nature reserve would provide a facility which does not currently exist and would provide additional and improved opportunities to access the area. Local residents have no rights to use the land as recreational space at present apart from the right of way along the northern boundary of the site

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site can be accessed from Clasemont Road.</p> <p><u>Local Highway Conditions:</u> Traffic congestion is an issue along the frontage and leading to J46 at peak times. Traffic congestion is also an issue at Morriston cross.</p> <p><u>Accessibility:</u> There is a 10 min and 60 min frequency service past the site.</p> <p><u>Wider Issues / Combined effect:</u> Possible traffic issues at J46 and at Morriston cross.</p> <p><u>Restrictions:</u> Access will need to be carefully located and will likely require a right turn lane. Individual plot access directly from Clasemont Road frontage should be avoided. A full Transport Assessment will be required to determine affect on local congestion issues.</p> <p><u>Transport Proposals:</u> None identified.</p>
CCS Housing	<p>The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period</p> <p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p>

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CCS Biodiversity	This site contains Species-rich Purple Moor-grass and Lowland Mixed Deciduous Woodland, which are habitats of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).
CCS Environmental Health	No comments
CCS Education	<u>Llangyfelach Primary</u> : There is Limited surplus capacity and no scope to extend. This site would generate a new school  <u>Morrison Comprehensive</u> : New build has been completed. There is some capacity to take increase in pupil numbers, however all the developments proposed for Morrison catchment will take this school over capacity. Therefore investment required
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	No sewer. Outside sewer catchment area. Nearest STW is Gowerton -MOU issues. <i>(NB: see DCWW comments – site actually drains to Swansea Bay STW)</i>  Possible BAP Habitat. Hedgerows and boundaries tend to be made up of mature trees. Some rush dominated areas and one small block of woodland. Provides good connectivity. Nearby records for badger. The Phase 1 map classifies the site are a mixture of improved & semi-improved grasslands. Likely to be utilised by bats for foraging and flight lines. The Phase 1 map classifies the site are a mixture of improved & semi-improved grasslands.  Land drainage -watercourses on site.  Possible contamination from former uses (shaft, etc.).
Dwr Cymru	<u>Water Supply</u> : <u>Initial Comments for Candidate Sites in the Ward</u> : The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.

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	<p><u>Site Specific Comments on the Draft Proposals Map:</u> The proposed development site is in an area where there are water supply problems for which there are no improvements planned within our current AMP Programme. In order to establish what would be required to serve the site with an adequate water supply, an assessment on the water supply network will be required. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	No comments received
Coal Authority	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth          And approximately 2 mine entries in centre of east</p> <p>Partly in Coal Referral Area – affects wetland and nature reserve area</p>



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Llangyfelach Community Council	The site is part of the green wedge which includes Morryston Golf Course and is situated on the north side of Clasemont Road which forms a green wedge between Llangyfelach, Morryston and the commons to the North of the site. Clasemont Road is the principal access road and with the volume of traffic from and to the DVLA and Morryston Hospital is extremely busy. Additional vehicles from this proposal would exasperate this problem. Any development of this size would have an adverse effect on the provision of educational facilities, which are stretched to the limits in this area.
Councillor Gareth Sullivan	Again, this site straddles the Llangyfelach Ward boundary, in that encroaches on to properties on Pantlassau Road. The area of land outlined, is a vast green area and the area butting Nant Y Gors cottage properties is common land. As such, it is the responsibility of Local Common Land owners, administered on their behalf by a local Agent.  The indication that 750 properties could be built on this area of land beggars belief. The present traffic management infrastructure would never sustain such a development. The development on such a large scale will result in the loss of a buffer between communities.

**Stage 3A: Assessment Against LDP Objectives**

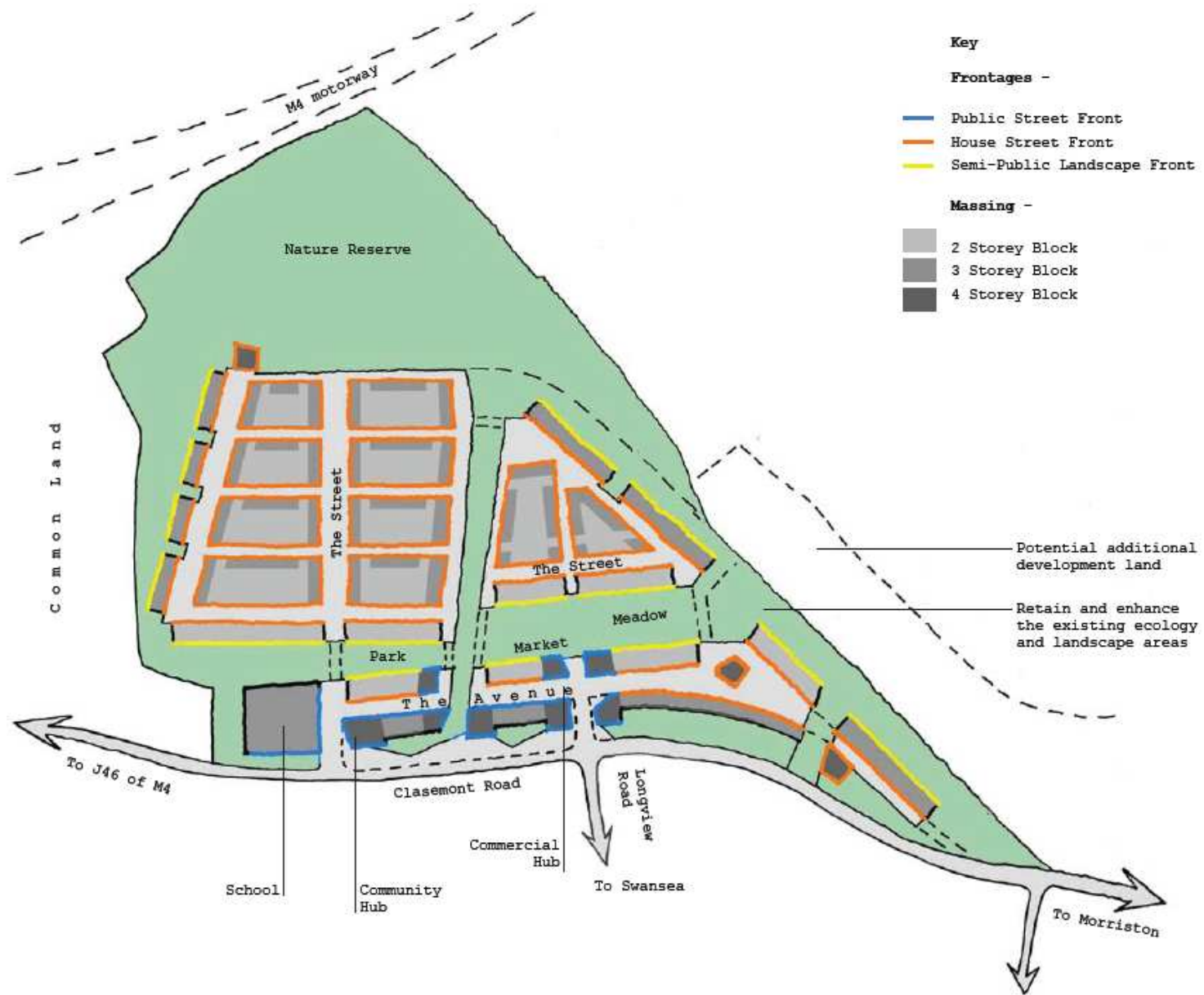
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	?	+1	n/a	?	-2	n/a	+2	+1	n/a	n/a	+1	+2	0	n/a	-2	0	-1	-1	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+/-	?	+/-	0	+	+	0	?	+/-	-	?	?	+	+	x	+/-	?	?	--	0	+/-

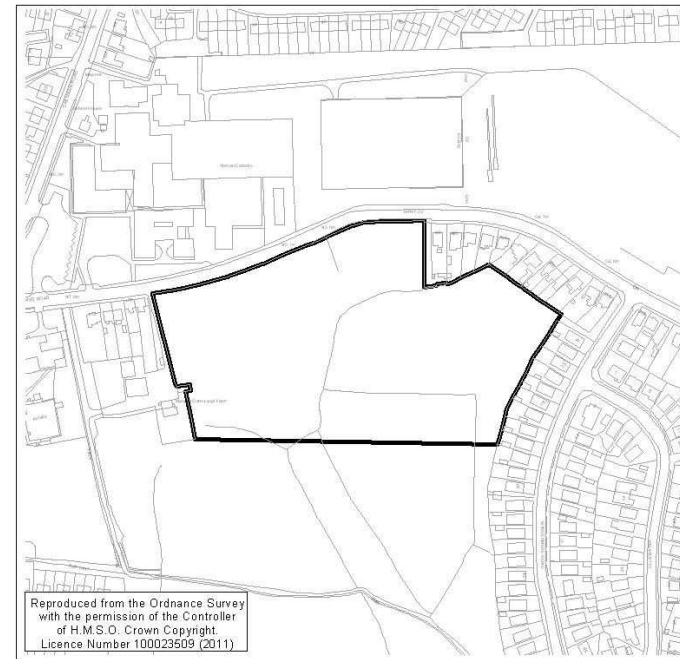


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<b>Reference</b>	<b>MB009</b>
<b>Name</b>	<b>Land at Mynydd Garnllwyd Road</b>
<b>Description</b>	Urban greenspace fronting onto Mynydd Garnllwyd Road, bounded by residential properties off Windermere Road to the East, urban greenspace leading to Llewellyn Park to the south, residential properties off Mynydd Garnllwyd Road to the west and Bishop Vaughan RC comprehensive school to the north
<b>Size</b>	3.29 Ha
<b>Existing Land use</b>	Greenspace
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

12 letters of objection were received which are summarised below:

- Increased traffic/parking issues on insufficient road infrastructure
- Loss of green space
- Adverse impact on wildlife/habitat
- Common land and should be protected as such
- Devaluation of property
- Loss of recreational space
- Adverse environmental impact
- Adverse visual impact

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

No further comments received.

### **Response to Representations**

- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site. The council have commissioned a Strategic Highway Network Assessment which will inform the detailed masterplanning process.
- There is a surplus of accessible natural greenspace provision in this area

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- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA). Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries
- Site is not common land
- Devaluation of property is not a material planning consideration
- Any development would need to comply with adopted residential design guidance SPG <http://www.swansea.gov.uk/spg> which seeks to encourage and support the creation of more sustainable communities and addresses issues such as visual and environmental impact

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site can be accessed via Mynydd Garnllwyd Road</p> <p><u>Local Highway Conditions:</u> Traffic volume is an issue at school times as this road serves local schools adjacent to and opposite the site. There is no footway along the site frontage</p> <p><u>Accessibility:</u> There is a 60 min frequency service past the site</p> <p><u>Wider Issues / Combined effect:</u> Local road capacity and congestion is an issue that would need to be considered, particularly school time traffic levels</p> <p><u>Restrictions:</u> Large traffic generating uses would not be suitable</p> <p><i>Further comments on potential for enlarged site:</i></p> <p>The original 80 house proposal would have required a transport statement, but the larger site will require a transport assessment – which is a more detailed analysis. Significant traffic generation is identified in IHT documents as generating an additional 10% to existing flows, or 5% in congested areas or where there are sensitivities. With the road restrictions on this hill due to kerb side parking and the volumes of traffic the lower figure is likely to apply here and these issues do not make development easily justifiable. There are also congestion issues at either end of the road at Caersalem lights and at Vicarage Road so it's not just the immediate highway issues here it's the impact on the wider highway network as well. Also, 100 houses is the threshold for requiring a Transport Assessment regardless of %'age impact.</p> <p>Judgement will need to be made based on a formal assessment but is likely to be sensitive and ideally there needs to be some gain from the development, assuming that technical assessment does not raise any insurmountable issues.</p> <p>There are some large housing proposals for Clasemont Road and there is currently congestion from Vicarage Road down to the cross at Morrison so this development would also add to that. Also Vicarage Road is traffic calmed so traffic is quite slow moving and this could raise an air quality issue with increased flows as the street is quite enclosed with frontage development each side.</p>

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	It isn't possible or wise to give a definitive answer to this development at this stage other than to raise the issues that are likely and highlight the need for formal assessment to consider its impact on the issues. Traffic section would advise on any other specific road safety concerns in this area.
CCS Housing	The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.
CCS Biodiversity	This site contains Lowland Heath which is a habitat of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006)
CCS Environmental Health	No comments
CCS Education	<u>Clase Primary</u> : This school has surplus capacity; however there are issues with condition and suitability. Concerns over increased numbers, due to traffic/pupil segregation  <u>Morrison Comprehensive</u> : New build has been completed. There is some capacity to take increase in pupil numbers, however all the developments proposed for Morrison catchment will take this school over capacity. Therefore investment required
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	Site includes small area of scrub and flailed / maintained hedgerows. Phase 1 classifies this area as semi-improved grassland.
Dwr Cymru	<u>Water Supply</u> : <u>Initial Comments for Candidate Sites in the Ward</u> : The local water supply network for this ward is sufficient to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.  <u>Site Specific Comments on the Draft Proposals Map</u> : The proposed development site is in an area where there are water supply problems for which there are no improvements planned within our current AMP Programme. In order to establish what would be required to serve the site with an adequate water supply, an assessment on the water supply network will be required.

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth
Coal Authority	Mining Legacy – mine entries at north

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-2	n/a	+1	0	n/a	n/a	n/a	+1	0	n/a	-1	0	-1	-1	n/a	?	+1	+1

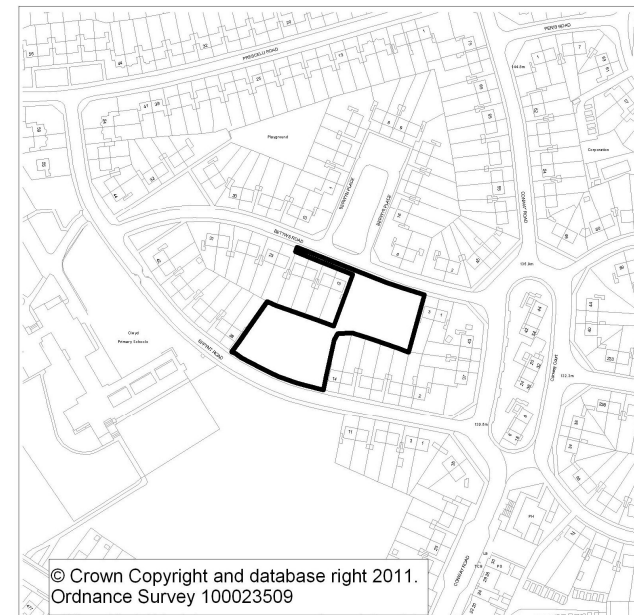
**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	+	+/-	0	?	+/-	-	+	?	?	+/-	x	+/-	?	?	++	0	?



## PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

<b>Reference</b>	<b>PD002</b>
<b>Name</b>	<b>Land between Eppynt Road/Bettws Road, Penlan</b>
<b>Description</b>	One of two small sites set in staggered arrangement between Eppynt Rd and Bettws Rd (the other is PD029), each capable of accommodating around 3 pairs of semis. The land steps down from north to south and is currently vacant and relatively featureless. The sites each failed stage 1 by reason of falling below the minimum size threshold, however when viewed together are large enough to be regarded as an allocation (10+ dwellings).
<b>Size</b>	0.36 Ha
<b>Existing Land use</b>	Vacant Land
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

No comments received.

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

**LDP Draft Proposals Map Consultation: Summary of Representations**

No comments were received specifically regarding this site.

PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access can be gained from Eppynt Rd or Bettws Rd</p> <p><u>Local Highway Conditions:</u> No adverse issues identified in the vicinity of the site.</p> <p><u>Accessibility:</u> There is a 10 min frequency service near the site on Pentregethin Rd</p> <p><u>Wider Issues / Combined effect:</u> None identified in this vicinity.</p> <p><u>Restrictions:</u> Dependant on development detail and traffic generation.</p> <p><u>Transport Proposals:</u> None identified.</p> <p><u>Amended Comments (30/04/15):</u></p> <p><u>Means of Access:</u> Direct vehicular access is available off Bettws Road and Eppynt Road (assumed 5 units on each site).</p> <p><u>Local Highway Conditions:</u> The footways on the site boundaries are already in existence and parking takes place on street on both boundaries. There are level differences to take into consideration (more off Bettws Road than Eppynt Road) so the drives will need careful consideration.</p> <p><u>Accessibility:</u> The site is well served by public Transport.</p> <p><u>Wider Issues / Combined effect:</u> Congestion at Clwyd School should be considered.</p> <p><u>Restrictions:</u> For the small scale development indicated I do not consider that there will be any highway issues arising. Parking for residents and visitors will be required in accordance with the adopted parking standards to be fully contained within the site. Dependent on level of development a highway to adoptable standards will be required (for anything in excess of 5 dwellings). Ideally turning within the plot will be provided although this is not always possible.</p> <p><u>Transport Proposals:</u> No TA/TS will be required for this small scale development.</p> <p><u>Further Information:</u> A travel plan will be required for any development over 10 dwellings.</p>

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CCS Housing	There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.
CCS Biodiversity	No issues
CCS Environmental Health	No issues
CCS Education	<u>Clwyd Primary</u> : There is some capacity at this school, and pupil numbers generated are small  <u>Pentrehafod Comprehensive</u> : Listed as a priority scheme within the Band A SOP; however the site is fairly limited in terms of future expansion.
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	Short section of mature trees on one of the boundaries which should be retained.  Moderate WFD - Tawe.
Dwr Cymru	<u>Water Supply</u> : <u>Initial Comments for Candidate Sites in the Ward</u> : The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.  <u>Site Specific Comments on the Draft Proposals Map</u> : The proposed development site is in an area where there are water supply problems for which there are no improvements planned within our current AMP Programme. In order to establish what would be required to serve the site with an adequate water supply, an assessment on the water supply network will be required.

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Amended Welsh Water Comments (31.03.14):</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by numerous public sewers for which protection measures, either in the form of an easement and/ or diversion may be required</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy – mine entry at east

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	?	+2	n/a	?	-1	n/a	+2	0	n/a	n/a	n/a	+1	0	n/a	-1	0	-1	-1	n/a	?	+1	+2

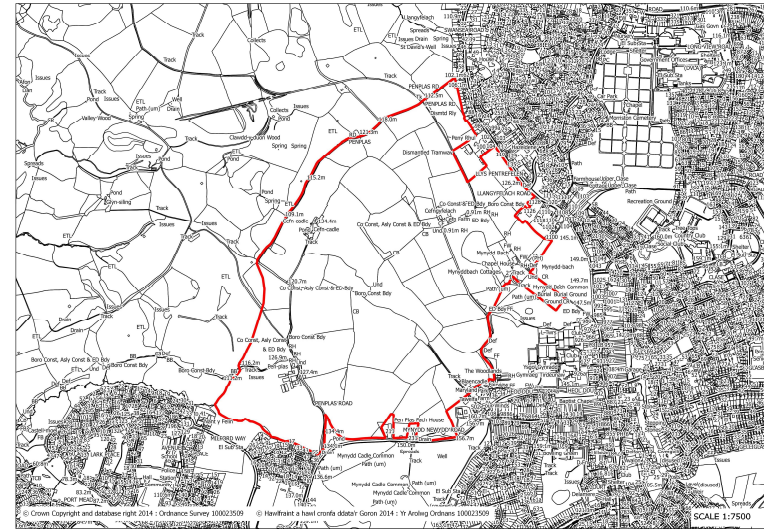
PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

Stage 3B: Assessment Against SEA/SA Objectives

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+	?	+	0	+	0	0	?	+	-	?	?	+	+	x	+	?	?	++	0	?

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<b>Reference</b>	<b>PD039</b>
<b>Name</b>	<b>Land North of Mynydd Newydd Road, Penderry</b>
<b>Description</b>	Large (Strategic scale) site located to the north of Mynydd Newydd Road and west of Swansea Road/Llangyfelach Rd capable of accommodating over 750 dwellings, plus recreational and community facilities including a new school. Encompasses a number of surrounding candidate sites, including <b>MB004</b> which is the likely main access point off Llangyfelach Road as well as Mynydd Bach Common ( <b>PD019</b> ) and land north of Milford Way ( <b>PD024</b> ). The northern boundary of the site extends up to Penplas Road, beyond which is the location of the proposed Royal Fern Golf Course (LF015). The site is primarily low grade agricultural land containing two farms and one haulage company yard on short term leases. The land gently slopes down from south to north, falling away to the northern and western boundaries. The site straddles three wards including Llangyfelach and Mynyddbach, but the majority of the site lies within Penderry
<b>Size</b>	116.7Ha
<b>Existing Land use</b>	Agricultural land
<b>Proposed Land Use</b>	Residential – Strategic Site
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

Not consulted upon – site identified at later stage

**LDP Preferred Strategy Consultation: Summary of Representations**

No specific comments received relating to this site

**LDP Draft Proposals Map Consultation: Summary of Representations**

2 letters of support received from planning consultants which are summarised below:

- The Strategic Site is located on the edge of Llangyfelach, and is therefore a sustainable location to accommodate additional growth and to provide new homes.
- There is a clear need for additional allocations within Swansea to meet identified need for both market and affordable housing
- We support the Draft LDP Proposals Maps which make provision for the allocation of the site put forward at Land west of Llangyfelach Road for a 'Residential Led Strategic Site'

**Response to Representations**

- The population of Swansea is growing year on year, there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan

## PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015

- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site. The council have commissioned a Strategic Highway Network Assessment which will inform the detailed masterplanning process
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- The Council will continue to work with the key development partners to produce a detailed masterplan for the strategic site which will consider the issues raised through the consultation process.



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**Key Stakeholder Consultations**

Internal Stakeholder	Comments
CCS Transportation	<p>Relate to MB004 ( first phase)</p> <p><u>Means of Access:</u> The site can be accessed from Llangyfelach Road.</p> <p><u>Local Highway Conditions:</u> Traffic speed is an issue along this section of Llangyfelach Road.</p> <p><u>Accessibility:</u> There is a 30 min frequency service past the site.</p> <p><u>Wider Issues / Combined effect:</u> Possible traffic issues at J46 and traffic signals in Treboeth depending on quantum of development.</p> <p><u>Restrictions:</u> Access will need to be carefully located and will likely require a right turn lane. Individual plot access directly from Llangyfelach Road frontage should be avoided.</p>
CCS Housing	<p>Part in North and part in Gtr NW SHPZ</p> <p>North: The SHMA identifies that around 2100 homes are needed within this strategic housing policy zone over the LDP period.</p> <p>Greater North West The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>Would need an extended phase 1 survey including a bat survey if buildings were to be demolished. Contains parts of the Mynydd Bach and Portmead SINCS possible significant ecological constraint on parts of the site</p> <p>Much of the area appears to be improved grassland which may have a relatively low ecological value there are though a series of hedges and small patches of woodland which will have value. The key areas are the Mynydd Bach and Port Mead SINCS parts of which fall within the red line, I think considering the size of the area the common should be excluded from the site. A full ecological survey would be required and there would need to be some significant mitigation / compensation</p>

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CCS Environmental Health	No Comments
CCS Education	<p><u>Gwrosydd Primary</u>: Limited surplus capacity and no scope to extend due to the constraints and topography of the site. Llangyfelach Primary is a relatively small school on a restricted site with limited scope for expansion.</p> <p><u>Portmead Primary</u>: There is some capacity at this school; however this development would exceed the school capacity. This development would require a New Primary and Secondary School</p> <p><u>Bishop Gore Comprehensive</u>: All developments proposed in the catchment for Bishop Gore would far exceed its capacity. There is a proposed school catchment review.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Foul to Gowerton STW- MOU issues.</p> <p>Aerial photographs of the site show that it is crossed by a network of hedgerows, providing connectivity across the site. Any development should seek to maintain or provide such opportunities. This larger Strategic Site contains several existing PRow's. The Phase 1 maps classify the majority of the site as improved grassland, with a small number of semi-improved parcels. Penplas Grasslands SSSI is located just to the north of the site.</p> <p>Moderate WFD. Also site close to historic landfill site at Penplas Fawr Farm.</p> <p>There are watercourses on site.</p> <p>Aquifer present. All foul to mains system.</p>

**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

Dwr Cymru	<p><u>Site Specific Comments on the Draft Proposals Map:</u>  A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required. The site is crossed by several water mains for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p>Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p><u>Gowerton Waste Water Treatment Works - Limited capacity</u></p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - Shallow – Recorded shallow coal workings and approximately 9 mine entries on east, south and west
Llangyfelach Community Council	<p>The Council are of the opinion that of the 3 sites in or partially in the Llangyfelach Ward none of them can be supported due to the lack of current infrastructure, especially in the case of the inadequate highway provisions</p> <p>The Council request that if all of the aforementioned large sites, are pursued, then in addition to the improvement of the infrastructure referred to above, then each site has adequate provision for shopping, new education facilities e.g. schools, recreation &amp; sports facilities, libraries, etc. etc. together with the provision of green areas with the sites.</p>

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	n/a	+1	+1	+2	?	-2	n/a	+2	+2	n/a	n/a	n/a	+2	0	n/a	-2	0	-2	-2	n/a	?	+2	+2

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	--	?	++	?	++	++	-	?	?	--	-	?	-	+/-	x	+/-	?	?	--	0	?

# LAND WEST OF LLANGYFELACH ROAD, CEFNGYFELACH

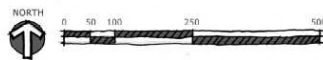
## LDP STRATEGIC SITE DEVELOPMENT FRAMEWORK

**Vision** - A development framework has been prepared for the Strategic Site based on the aspirations of, and proposals within, the LDP Preferred Strategy. This identifies the site as 'offering an attractive environment and sustainable location for new homes'. The Strategic Site presents an opportunity to create a high quality new neighbourhood.

A high level analysis of the context and characteristics of the site and local infrastructure has informed this initial masterplan. The high level analysis undertaken has confirmed that the site is not subject to any significant constraints, and has demonstrated that the proposals are considered to be deliverable, feasible and viable, and able to respond positively to the opportunities of the site. Whilst further technical studies and stakeholder engagement will be undertaken to refine and confirm the development proposals going forward, a number of key principles have been defined which comprise the development framework for the strategic site.

- Proposed Housing Parcel
- Proposed New Community Hub
- Proposed New Local Amenity Land
- Potential Commercial / Leisure / Mixed-use Development Opportunity
- Possible area of expansion for Housing and/or Enhanced Education Facilities
- Common Land
- Existing Settlement

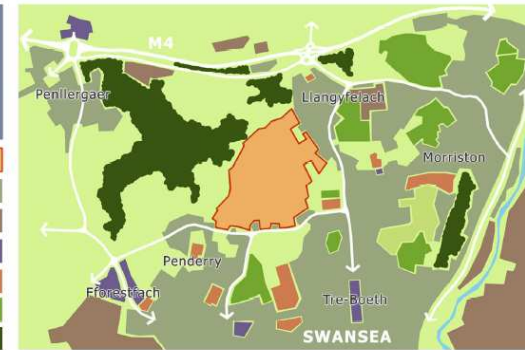
- Proposed Primary Infrastructure
- Existing Regional Links
- Proposed Pedestrian & Cycle Routes
- Proposed Green Infrastructure
- Proposed Public Open Space (Indicative Location)
- Key Residential Frontages
- Primary Landscaping
- Key Gateway
- Inter Site Connections



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**Geraint John Planning**  
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**C.W. Architects**  
 Grosvenor House, 8 Park Grove,  
 Cardiff, CF10 3BN  
 Tel : 029 20 223123



### Principal Components

#### 1.0 Delivery of New Road

A proposed new highway (from the B4489 Llangyfelach Road in the east to Mynydd Newydd Road to the south) is to be delivered by the proposals. Junction improvements at the crossroads of Llangyfelach Road and Mynydd Newydd Road are to be promoted by the proposals. This will enhance the capacity of the surrounding road network, and alleviate and address the identified issues of traffic congestion and air quality along Llangyfelach Road.

#### 2.0 Sustainable Transport Linkages and Connectivity

The location of the site is highly accessible and the opportunity to enhance the wider public transport network / cycle and footway facilities will be harnessed. The creation of a neighbourhood that is underpinned by a network of walking and cycling routes will promote sustainable transport linkages to Commercial, Community and Recreational facilities. The long-term provision of such sustainable transport linkages forms a key design principle, and will increase connectivity across the wider area and positively integrate with existing communities. The location of such linkages has been carefully considered to maximise opportunities for regeneration in areas within, and adjoining the site including the recreational areas of Llan Valley to the north.

#### 3.0 Complimentary Uses and a New Community Hub

The proposals will promote the provision of enhanced recreational playing fields and improved local educational and community facilities both for the existing community and the proposed new development. The provision of a Community Hub will create a variety of neighbourhood uses for the community. These complimentary community and recreation facilities will be positioned to enable and facilitate easy access between, and to, both the existing community and proposed neighbourhoods addressing the current under-provision in the locality.

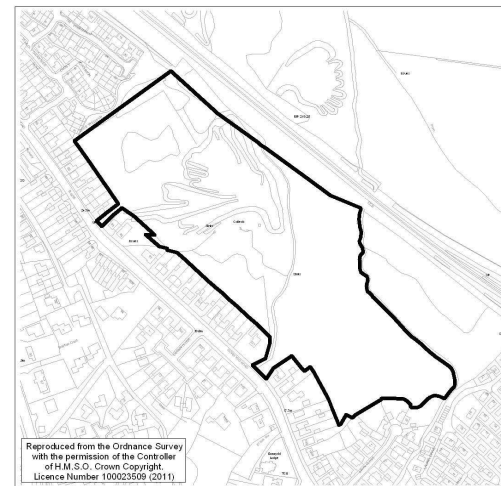
#### 4.0 Regeneration

The provision of accessible open space within and around the strategic site will deliver environmental and quality of life benefits to the proposed neighbourhoods and adjoining communities. The proposals seek to improve local service infrastructure for the local community, with the development underpinning and facilitating the possible re-opening of education uses to the south east of the site. This will facilitate and contribute to the broad regeneration of the wider area.



**PLANNING COMMITTEE – 4<sup>TH</sup> JUNE 2015**

<b>Reference</b>	<b>GT005</b>
<b>Name</b>	<b>Former Cefn Gorwydd Colliery, Gorwydd Rd, Gowerton</b>
<b>Description</b>	Former colliery site. Majority covered by Woodland TPO. The mine shafts and spoils remain untreated and in situ. The site takes the form of an elongated rectangle with an area of approximately 6.6 hectares. To the North East is the main Swansea to Fishguard railway and to the South West are the rears of properties fronting Gorwydd Road. To the North West is a new housing development built on the former cattle market. To the South East is some open land and housing in Bryn Close. There is further housing development beyond. The Gors Fawr Brook forms the North East boundary of the site. The site is uneven and is covered with dense vegetation and wooded areas. Informal footways run through the site and provide access to informal recreation from the adjacent residential areas. However the site is privately owned and is not public open space.
<b>Size</b>	6.39 Hectares. (2.6ha residential & approved 4ha Nature Conservation Area)
<b>Existing Land use</b>	Former colliery site, largely covered in dense vegetation and wooded areas, including TPO woodland.
<b>Proposed Land Use</b>	<b>Residential / Nature Conservation / Open Space</b> 90 residential units on area of 2.6ha Nature Conservation Area (for public access and to maintain/enhance SINC) on approx 4ha.
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

1 x 224 signature petition of objection received on the following grounds:

- Green wedge
- Should be conserved and enhanced for the sake of its natural heritage, natural resources, historic and cultural, environment and agricultural and recreational value
- Contrary to national and local policy
- Area is very important for containing and shaping the urban form and the surrounding settlements
- Preservation of land as green wedge will assist urban regeneration by encouraging the recycling of derelict and other urban land
- Adverse impact on character
- Inappropriate size and scale
- Insufficient utilities and community facilities
- School not sufficient size and scale to cater for increase in pupils
- Loss of wildlife and habitat
- Inadequate road infrastructure to accommodate additional traffic
- Highway safety
- Increase in noise and air pollution
- Detrimental to residential amenity
- Loss of privacy
- Inadequate sewerage system
- Inadequate drainage
- Possible adverse impact on Burry Inlet

17 letters of objection received on the following grounds:

- Inadequate road infrastructure to accommodate another large development
- Inadequate site access
- Increase in traffic congestion
- Green wedge

- Protected trees on site
- Loss of wildlife/habitat
- Loss of recreation space/open space
- Increase in noise pollution
- Highway safety
- Flood risk
- Inadequate sewerage system
- Schools are too small to accommodate increase in pupils
- Outside village boundary
- Encroachment into open countryside
- Devaluation of property
- Contrary to current policy
- Coalescence of settlements
- Lack of local amenities e.g. medical facilities
- Loss of privacy
- Adverse environmental impact
- Safety/suitability of land due to mine workings
- Would become overdeveloped/cramped area
- Adverse impact on rurality of area

2 letters of comment received:

- Support the proposed use for Nature Conservation and/or open space

### **LDP Preferred Strategy Consultation: Summary of Representations**

Comments were received from the Agent for the Landowner promoting the development of GT006.



**LDP Draft Proposals Map Consultation: Summary of Representations**

A 45 name petition and 126 letters of objection were received which reiterated previous comments and made the following additional observations:

- The Woodland Trust made representations confirming that the site is not Ancient Woodland.
- The decline of the “Country Park” should be reversed through creation of new paths. Overgrowth removed and wildlife protected, working history of site excavated and preserved.
- Suggest land be used to create footpath from Fairwood Terrace to the station. Expand Gowerton Car Park and create footpath from north/behind allotments – relieve pressure on the station car park which could also expand.
- Impact on character of existing properties, particularly re creation of access between no’s 81 and 83.
- Tree preservation orders on oak trees.
- Increased traffic congestion
- Loss of important local amenity/greenspace of local historic interest
- Longstanding informal public access to site.
- Site part of green infrastructure/biodiversity network along with GT006 and land north of Gowerton Station.
- Trees act as noise and air pollution buffer for adjacent industrial site. A background baseline noise assessment should be carried out
- Gowerton has had enough development
- Use land as recreation land to address current lack of park in the village
- Loss of greenfield site – use brownfield sites
- Impact on quality of life from loss of greenspace
- There is also a subterranean stream that runs under Gorwydd Road which runs into the Gors Fawr brook in the woods.
- Site should be preserved and maintained as open space
- Trees etc have stabilised small coal spoil tips. Any development would disturb and de-stabilise the present infrastructure, causing land slip and drainage problems which would lead to yellow pollution of the streams.
- Increase current road safety and congestion issues

## Response to Representations

- The site lies within the green wedge as identified in the UDP. However, upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions, e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. The role of land in preventing coalescence has been taken into account in the candidate site and the settlement boundary review process. A review of green wedge boundaries is also underway and will form part of the LDP Deposit plan evidence base.
- The landowner recognises the natural, cultural and recreational value of the site. A number of technical studies have been undertaken which have informed the proposed site layout. The layout includes a proposal to create a Nature Conservation area on the northern part of the site which will be the subject of a management agreement. The development of the southern part of the site should therefore facilitate improvements to the area currently used by local people and ensure its use into the future. In particular, it would formalise the currently unauthorised public use of this privately owned land. Representations suggesting the use of the land for community benefit, including the creation of footpaths and station car parking are welcomed and will be taken into account in the detailed masterplanning of both this site and the Waunarlwydd Strategic site.
- Maintaining and enhancing the green infrastructure network is a key development principle of the draft concept plan for the strategic site which looks at the cumulative impact of development both within the site and throughout the wider area.
- With regard to the specific issue of protected trees, the Woodland Trust has confirmed that the site is not ancient woodland. The site is the subject of a woodland tree preservation order which protects groups of trees rather than specific individual trees. The landowner carried out a tree survey which was submitted as part of the original candidate site representation in 2011. This survey was recently updated in November 2014 and further survey work carried out earlier this year. The survey contains a detailed assessment of the location, type and condition of the trees on the site. The recommendations of the survey have informed the location of development as shown in the site layout with development proposed only on those areas surveyed as being of poorer quality.
- The population of Swansea is growing year on year, there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes. The SHMA identifies that around 4,600 homes are needed within the Greater North West strategic housing policy zone over the LDP period. The Preferred Strategy is to maximise the use of brownfield land where appropriate but the strategy recognises that in order to meet the housing requirement a significant amount of greenfield land will also be required.

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- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site. The developer has submitted with a Technical Note on Highways and Access prepared by consultants Savell Bird & Axon which concludes that a suitable junction can be designed to ensure that the site can be safely accessed.
- The Council's Environmental Health Section have highlighted that ground conditions surveys would be required due to the presence of the former mine workings provides information on guidance on historic site activities, including the location of landfill sites and appropriate buffer zones. The Coal authority has also highlighted issues regarding the mining legacy. Existence of such features on or near to a site does not preclude development and a detailed ground investigation survey would need to be undertaken at planning application stage to identify and address all such issues. The landowner submitted a desk survey of geotechnical and Geoenvironmental information which set out recommendations for phase 1 geotechnical and Geoenvironmental site investigations. The survey covers issues of contamination, hydrology, land stability/geology and the location of mine workings and entries.
- The potential impact of the loss of any trees on noise and air pollution from the adjacent industrial estate would be a detailed matter to consider at planning application stage dependent upon the nature of the eventually proposed scheme.
- Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW have invested in a new hydraulic model for the Gowerton catchment which has identified solutions throughout the catchment which would have to be delivered prior to development occurring. In combination with this there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements
- The landowners have submitted a Hydrology Report by Atkins (March 2011) which concludes that the site is suitable for residential development in terms of drainage and flood risk.

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- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control.
- Gowerton is a sustainable location for development. It has relatively good access to local facilities and with high levels of opportunity to access higher level services and facilities by means of non car/public transport, in particular rail links from Gowerton Station. With regard to the capacity of services and facilities, the local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- NRW have highlighted the presence of Gors Fawr Brook on the site and recommend that a minimum 7m buffer is required to allow access for maintenance.

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site has two access points indicated onto Gorwydd Road. Improved access would be required.</p> <p><u>Local Highway Conditions:</u> Gorwydd Road is a main access road connecting Gowerton to Waunarwydd and therefore carries significant traffic.</p> <p><u>Accessibility:</u> There is a 10-15 min frequency bus route past the site.</p> <p><u>Wider Issues / Combined effect:</u> No additional sites listed for this locality.</p> <p><u>Restrictions:</u> A significant traffic generating use would add unacceptably to current traffic conditions. Development of the site may therefore need to be restricted and would be subject to a suitable access layout being formed. There may be a need to address safety issues off site in the locality as a result of additional traffic generation.</p> <p><u>Transport Proposals:</u> No transport proposals currently.</p> <p>Candidate Site GT005 was submitted with a Technical Note on Highways and Access prepared by consultants Savell Bird &amp; Axon. The note concludes that based on a proposed for a maximum of 300 units that</p> <p><i>“5.3....the site can be accessed in a safe manner in accordance with design standards, and can be developed to promote travel by non car modes.</i></p> <p><i>5.4 The analysis has demonstrated that the site is located within 400m walking distance of a regular bus service to Swansea City Centre and within 700m of Gowerton train station which also provides services to Swansea. Both of these distances are considered by the IHT as acceptable walking distances to bus and rail facilities respectively.</i></p> <p><i>5.5 A new priority junction has been designed with Gorwydd Road which can be constructed to engineering standards and has the recommended visibility splays as per Manual for Streets and TAN 18. This junction will be located within the existing access to this brownfield site.</i></p> <p><i>5.6 In addition, it has been demonstrated that the junction provides sufficient capacity to accommodate the predicted demand from future development on this site.</i></p>

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	<p><i>5.7 Moreover, an additional point of access to the development will be provided at the north westerly part of the site. This will provide for pedestrians and cyclists and will act as a secondary point of access for emergency vehicles should one be required subject to the density of the site.</i></p> <p>The technical note was made available to the Council’s Senior Assistant Engineer in Feb 14 who confirmed that</p> <p><i>“The traffic assessment submitted for Gorwydd Road is acceptable in principle but there may still be a need to supplement safety enhancements in the area due to additional traffic generation by the development.”</i></p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>Contains Lowland Mixed Deciduous Woodland supporting an assemblage of ancient woodland indicator species and Diverse scrub. Wet Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under NERC. Species recorded; Bullfinch, Herring gull, House sparrow, Marsh tit, Song thrush are species of principal importance for the conservation of biological diversity in Wales under NERC. recorded species of medium conservation concern; Woodcock and Goldcrest.</p>
CCS Environmental Health	<p>Residential / Nature Conservation / Open Space: overlays site 010 Gorwydd Colliery: site investigation condition</p>
CCS Education	<p><u>Gowerton Primary</u>: There is no particular concern in respect of these proposed sites as there is sufficient capacity within the primary school overall, however the school is currently based over 3 sites and some of capacity is within timber demountable classrooms. Note however that this school currently features as a priority within the 21st Century Schools Programme for rebuild on a new site. Depending on when these sites came forward, some remodelling works may be required on the existing sites and further consideration to a bigger replacement school. There is concern on the impact on highways around existing school sites.</p>

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	<p><u>Gowerton Comprehensive</u>: Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>Probable BAP Habitat. Mixture of woodland, scrub and grassland. Likely to support various species, including; bats, badger.</p> <p>Ordinary watercourse (partially culverted) present. Main River - Gors Fawr Brook lies at the north east corner of site. A minimum 7m buffer is required to allow access for maintenance.</p> <p>Potential contamination from historic use.</p>
Dwr Cymru	<p><u>Water Supply</u>:  <u>Initial Comments for Candidate Sites in the Ward</u>: The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site.</p>

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	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	<p>There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth. However, please be aware it may be necessary for reinforcement works on the 132kV and 33kV network supplying these sites to be carried out, to enable the space capacity at the EHV/11kV transformation sites to be released.</p>
Coal Authority	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth and approximately 5 mine entries in centre.</p> <p>See Geotechnical Desk Study Report submitted by with CS Submission.</p> <p>Contains information from Coal Authority dated 24.2.2011</p> <p>Site within likely zone of influence from workings in 4 seams of coal at shallow to 280m depth and last worked in 1900.</p> <p>9 Mine entries within or within 20m of site.</p>



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	Recommend investigation of coal and former coal mines and their treatment. Plan of location of disused mine entries supplied
Gowerton Community Council	<p>We SUPPORT the proposed use for Nature Conservation and/or Open Spaces.</p> <p>It's an environmental advantage to the area and the natural habitat of many creatures/animals. We feel it's extremely important to keep as many green areas and open spaces within Gowerton. WE STRONGLY OBJECT - to Residential Use on following grounds:</p> <ol style="list-style-type: none"> <li>1. The environmental impact of the development. There is reportedly bats in this area so it should be protected.</li> <li>2. The safety and/or suitability of developing the land (due to existing mines under this land).</li> <li>3. This is an existing open space, and this if developed would be come and overdeveloped/cramped area.</li> </ol>

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+2	n/a	?	0	n/a	+1	0	n/a	n/a	n/a	+2	n/a	n/a	0	0	0	+1	0	?	+2	+2

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	+/-	?	+	0	+	+	0	?	+	+	+/-	?	+/-	++	x	+/-	?	?	--	-	+

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<b>Reference</b>	<b>GT006</b>
<b>Name</b>	<b>Land to the east of Fairwood Terrace, Gowerton</b>
<b>Description</b>	Woodland area, roughly rectangular in shape, drawn to arbitrary boundary along eastern length. Extends southwards from the end of Fairwood Terrace and fronts onto the undeveloped eastern side of Lliw Valley Close. The south of the site is bounded by the West Wales railway line. Original eastern boundary has now been extended further east to link with proposed Strategic Site and provide link to northern side of railway station.
<b>Size</b>	1.14 Hectares
<b>Existing Land use</b>	Designated open countryside beyond existing settlement boundary
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)

Updated boundary to GT006 (now included within boundary of Strategic Site G)



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Original candidate site boundary.



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

The Candidate Site application was advertised on site in the form of a site notices.

15 letters of objection were received which are summarised below:

- Flood risk.
- Adverse impact on wildlife/habitat.
- Loss of recreation space.
- Inadequate road infrastructure and site access.
- Increase in traffic/highway safety.
- Public footpath through site. (Footpath (LC/101/2) goes through site, part of Gower Way).
- Contaminated land.
- Adverse impact on amenity.
- Previous planning applications rejected.
- Pylons on site.
- Green wedge.
- Mains sewage runs under site.
- Inadequate sewerage system/water system.
- Inappropriate size and scale.
- Lack of local facilities e.g. medical centre/schools.
- Japanese knotweed on site.
- Adverse environmental impact.
- Increased noise pollution.
- Extremely important to keep as many green areas and open spaces within Gowerton
- Would destroy rurality of the area.

### **LDP Preferred Strategy Consultation: Summary of Representations**

- Support is given for recognition that Gowerton is an area where development is considered to be appropriate. But Candidate Site Reference No. GT0006 is considered to be a suitable, sustainable and appropriate site for residential development, and should be allocated within emerging Plan. Support is given to the recognition that development should be directed towards sustainable locations. The proposed site on land to the east of Fairwood Terrace (Candidate Site Reference No. GT0006) would therefore comply with this Policy.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

39 letters of objection were received which reiterated previous comments and made the following additional observations':

- Value of site as part of the green infrastructure network
- Trees act as noise and air pollution buffer for adjacent industrial site. A background baseline noise assessment should be carried out now
- Traffic impact of current application at western end of Fairwood Terrace should be taken into account.

1 letter of support was received

- Landowner supports a housing site for 35 units and forming part of a 'Mixed Commercial / Employment / Residential Strategic Site'.

### **Response to Representations**

- Highways improvements would be required as part of any development proposal to increase road capacity and highway safety. However, existing capacities at the junction of Fairwood Terrace with Victoria Road will limit the capacity of any residential development that can be achieved on the site.
- The WG DAM Maps show that the site lies in Zone B and is therefore suitable for residential development. Zone C2 lies immediately to the north. However, the northern section of site is within area benefitting from flood defence. The Northern boundary is identified as area of surface water flooding.

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- A public right of way does not preclude development - it may be diverted and an appropriate alternative route incorporated through the development site. The location of public footpaths through the site is reflected in the proposed site layout, together with proposals for new and enhanced public footways and cycleways.
- 100% priority habitat sites have been filtered out of the site selection process. The site contains habitat identified in the NERC Act 2006 therefore an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. When wider issues need to be taken into account any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA). Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries
- Site investigation would need to be undertaken as part of any planning application. Permission would be subject to conditions which would require the removal of invasive species prior to commencement of development.
- Acknowledge that site is used for informal recreation. Any loss of recreational/open space will need to be addressed through compensatory provision within the proposed development or nearby. Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development. Candidate site now forms part of larger strategic site. A key development principle in the draft concept plan for the strategic site is the provision of recreation and open space/green corridors.
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- The site lies within the green wedge as identified in the UDP. However, upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- The presence of features on or adjacent to a site such as pylons and electricity cables does not preclude development. A minimum clearance distance will need to be satisfied if site is to be developed.

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- Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW have invested in a new hydraulic model for the Gowerton catchment which has identified solutions throughout the catchment which would have to be delivered prior to development occurring. In combination with this there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements. DCWW have also confirmed that a public sewer and a water main cross the site for which protection measures, either in the form of an easement and / or diversion may be required.
- The Council's Environmental Health Section provides information on guidance on historic site activities and have highlighted site investigations would be required due to the former use of the site as a Tinplate Works. They have also indicated potential noise issues due to the proximity to the railway. The Coal Authority provides advice on past mining operations and their representations highlight the presence of past mine workings. Existence of land contamination or instability features on or near to a site does not preclude development and a detailed ground conditions survey would need to be undertaken at planning application stage to identify and address all such issues.
- The potential impact of the loss of trees on noise and air pollution from the adjacent industrial estate has been raised with Environmental Health for further investigation where appropriate.
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- Maintaining and enhancing the green infrastructure network is a key development principle of the draft concept plan for the strategic site which looks at the cumulative impact of development both within the site and throughout the wider area.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site can be accessed from the end of Fairwood Terrace</p> <p><u>Local Highway Conditions:</u> The junction of Fairwood Terrace onto Victoria Road has limited visibility due to the presence of the railway bridge. A significant traffic generating use would not be suitable.</p> <p><u>Accessibility:</u> There is a 30 min frequency bus route within 300m of the site.</p> <p><u>Wider Issues / Combined effect:</u> No additional sites listed for this locality.</p> <p><u>Restrictions:</u> The junction of Fairwood Terrace onto Victoria Road has limited visibility due to the presence of the railway bridge. A significant traffic generating use would not be suitable. The site should be restricted to frontage development as a rounding off of the street.</p> <p><u>Transport Proposals:</u> No transport proposals currently.</p> <p>The landowner has had the opportunity to consider this highways advice and as a result submitted advice received from their own highway consultant in terms of the potential highways impact, particularly in regards to the impact on the junction of Fairwood Terrace onto Victoria Road. In summary, this advice concluded that confirmed that the council's guidance on visibility does not have regard to how many units are served, as the junction is either suitable or not. In this case, as it has been confirmed that the junction is suitable to provide for an additional circa 10 units, then it is considered that circa 20 units would also be acceptable as well. The advice also reviewed accident data and concluded that "the junction is safe and therefore that the visibility is evidently adequate." With regard to visibility splays it concluded that "the visibility splays that are available aren't so far short of the required measurement as to be unacceptable".</p> <p><a href="#">CCoS Transportation department have reviewed this additional information and have responded that they do not intend to provide a challenge to the landowner's highways advice.</a></p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period.</p>



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CCS Biodiversity	This site contains Wet Woodland supporting an assemblage of ancient woodland indicator species and Diverse scrub. Wet Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under the Natural Environment And Rural Communities Act (2006).
CCS Environmental Health	Former Tinplate works: site investigation condition: S boundary dir adj to railway - noise
CCS Education	<u>Gowerton Primary</u> : New / relocated school is in the process of being built, however this is being constructed to current numbers on roll requirements. Therefore any increase in pupil numbers could require an extension to facilities  <u>Gowerton Comprehensive</u> : If all developments for the Gowerton catchment went ahead the pupil numbers would exceed current capacity. The site contains a number of timber demountable classrooms. There would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.  Probable BAP Habitat within the Strategic Site. Mixture of woodland, scrub and grassland. Likely to support various species. The Phase 1 map classifies the land as a combination of woodland/scrub and semi-improved grassland. A PRoW crosses the northern part of the site from east to west.  WFD moderate.  The Main River Gors Fawr Brook lies at the northern boundary of site. A minimum 7m buffer is required to allow access for maintenance. Partially Zone B flood risk.

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<p>Dwr Cymru</p>	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
<p>Western Power</p>	<p>There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.</p>
<p>Coal Authority</p>	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth.</p>
<p>Gowerton Community Council</p>	<p>We strongly object to this land being developed for residential use.          We strongly feel that this area should be maintained as an open green space it is of an environmental advantage to the area and the natural habitat of many creatures. We feel it is extremely important to keep as many green areas and open spaces within Gowerton.</p>

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+2	n/a	?	0	n/a	+1	0	n/a	n/a	n/a	+2	n/a	n/a	0	0	0	+1	0	?	+2	+2

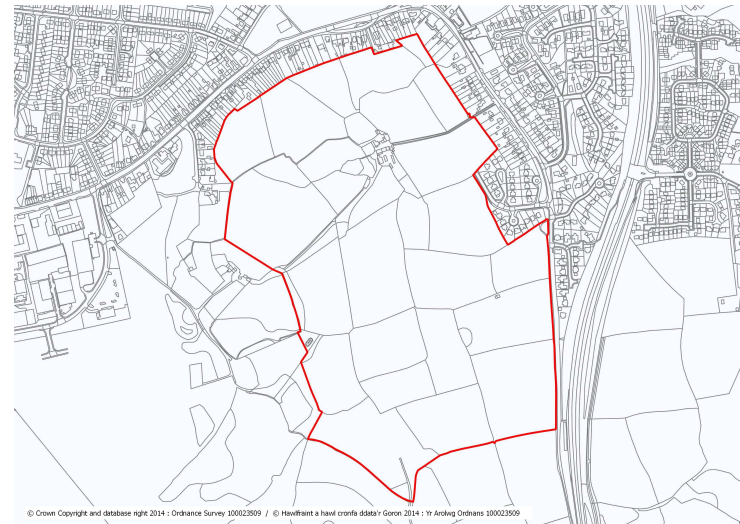
**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	--	?	+	0	+	+	0	?	+/-	+	+/-	?	+/-	++	x	+	?	?	-	-	+/-

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<b>Reference</b>	<b>PG002</b>
<b>Name</b>	<b>Land at Parc Mawr Farm, Penllergaer</b>
<b>Description</b>	Proposed strategic development site to south of Penllergaer and west of A483. Identified as a potential major mixed use development area in Preferred Strategy and now subject of an indicative masterplan for up to 1000 homes with a new primary school, community facilities, formal/informal open/play space, local food production, greenspace areas, etc. It would also provide an alternative access road between the A4240 Gorseinon Rd and the A484 Llanelli Link Rd to alleviate traffic congestion issues around M4 Junction 47
<b>Size</b>	Over 50 Ha
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential (850+)
<b>Location Plans</b>	OS Plan and Aerial (not to scale)

Current site boundary



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

1x 513 name petition of objection received from adjoining residents which is summarised below:

- Destruction of good quality productive farmland
- Congestion on adjoining roads and J47
- Undermine green wedge designation
- Completely change character of land
- Compromise settlement identify/swamp existing community
- Houses proposed can be accommodated on the Felindre site

82 letters of objection were received which are summarised below:

- Detrimental impact on current residents
- Increased strain on services
- Road network unable to accommodate increased traffic
- Loss of high grade (3A) agricultural land
- Devaluation of property
- Loss of privacy
- Local schools at capacity
- Sewerage system/Gowerton STW at capacity
- Adverse impact on wildlife/habitat/important hedgerows
- Highway safety
- Increased noise and pollution
- Inadequate site access
- Green belt/contrary to existing UDP policy
- Adverse impact on character and amenity
- Inadequate utilities infrastructure – no upgrade since identified as being at capacity in 2007
- Lack of social facilities for all ages
- Lack of public services e.g. doctors, dentists etc.

- Adverse impact on health and wellbeing
- Adverse impact on Loughor Estuary and Burry Inlet
- Rejected at IHLPS and UDP Inquiry on grounds of precedent for further release and change of character
- Overcrowding/overdevelopment
- Inappropriate size and scale
- The UDP identified capacity for only one additional site at Penllergaer of around 250 dwellings (north of Llewellyn Rd)
- Would not provide affordable housing for local needs
- Poor connections to the primary school – by non-car modes

1 letter of comment was received which is summarised below:

- Large impact on already congested roads
- Increased pollution
- Highway safety
- Lack of capacity in local schools
- Rejected in Interim Housing Land Policy Statement 2009 because it would represent a substantial release of Greenfield land.

### **LDP Preferred Strategy Consultation: Summary of Representations**

2 letters of objection were received which are summarised below:

- Previous proposals have been rejected at this location
- Crime likely to escalate with increase in population
- Grade 3A agricultural land
- Volume of traffic, noise and pollution
- Loss of habitat/impact on environment and wildlife
- Expand Felindre as an alternative
- Site is much larger than originally proposed
- Major impact on community
- Local sewerage problems

1 letter of comment: If there is to be a new school then it should be a Welsh school – the existing Welsh schools are at capacity

1 letter of support from site promoter

### **LDP Draft Proposals Map Consultation: Summary of Representations**

4 letters of objection received which are summarised below:

- Proposed is agricultural land and changing use will adversely affect environment and local community
- In-filling actively discouraged by Government
- Issues of density and overdevelopment which cannot be sustained by present infrastructure
- Roads already impacted by more recent development and exit/entrance to the development would add pressure and overcrowding
- Safety of children and young people
- Detrimental impact upon residential amenity
- Traffic congestion/noise pollution
- Restraints of Gowerton STW capacity
- Inadequate highways and drainage infrastructure
- Contrary to national policy and the LDP Preferred Strategy
- Few proposals to improve facilities for new residents (medical centre, extra classrooms, cycle path link, etc)

### **Response to Representations**

- Significant improvements are needed to alleviate existing highway congestion issues focussed on M4 J47 which will be exacerbated by further planned development in Pontarddulais, Kingsbridge, Gorseinon and further afield. This site provides the only potential alternative route to the south of Penllergaer to ease congestion by providing a link between the A4240 Gorseinon Rd and the A484 link road to the south – providing an option for N-S flowing traffic to bypass J47. New infrastructure and highway mitigation measures through this site and within the surrounding locality are being appraised against outputs from origin – destination modelling and will inform the more detailed masterplanning process.

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- Although a Development Framework has been prepared for the site a means of access to satisfy the highways authority is yet to be established and this issue will need be addressed as part of the masterplanning for the site and to satisfy the highways implications of the strategic transport study
- Upon commencement of preparation of a new development plan ( LDP process currently underway) all existing policies and previous decisions, e.g. current UDP Inspector's findings, are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016
- The site is open countryside and green wedge (not green belt) in the UDP. Development has historically been resisted at this location, however each time a development plan is prepared areas of open countryside /settlement boundaries have to be reconsidered. The pressure for development is always greatest at urban/rural fringe locations such as this, particularly in locations with close links to the strategic highway network. Green wedges unlike Green Belts are only temporary in nature and around 40% the new housing to be allocated in the LDP will have to be on land currently designated as green wedge, as there is insufficient land available within existing settlement boundaries to meet all future demand.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- The local primary school is at capacity and a new minimum 2-form entry school is proposed as part of this proposed development which would address existing and future needs. It would also be located on a less congested route and the additional land release proposed at the Civic Centre Office site would require a pedestrian footbridge across the A 483 connecting to the Old Llangyfelach Rd and providing a safe route through to the currently isolated Parc Penllergaer site. Pontarddulais Comp would be expanded and upgraded through the additional development (750+ dwellings) proposed to the north of the Comp. The catchment for this school would also need to be reviewed which will help reduce traffic movements.
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers



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- DCWW have responded as part of the recent consultation and have confirmed that sewerage capacity improvements may be required. Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements. In addition, there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding.
- Sustainable urban drainage scheme (SUDS) will need to be incorporated into development schemes as necessary. All new development needs to demonstrate that greenfield run –off will be achieved. No increase in surface water run-off would be permitted
- Insufficient information to be able to judge overcrowding/overdevelopment – this is a matter for planning application stage. Any development would need to be in keeping with context of adjoining development and comply with the Council’s residential design guide SPG which sets out acceptable parameters for new development and addresses residential and visual amenity considerations for existing and future occupiers, such as character, density, size, scale, overlooking, minimising disturbance ( noise, etc). New development would also provide formal and informal open space which would actually increase local recreational (health and well being) opportunities
- Devaluation of property is subjective and not a material planning consideration – there are no rights of open access or views over the countryside adjoining the existing settlement and property prices inflated on such basis are not a true reflection of value
- There is no evidence to indicate a causal relationship between new development and increased crime rates. South Wales Police are fully consulted during the LDP preparation process and crime prevention measures will be considered as part of the design process accordance with the Council’s Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- Around 60% of land needed for future development within the County over the period to 2025 can be accommodated within existing settlement boundaries for the purposes of the LDP; however this proportion will decrease for future development plans as the supply of brownfield land diminishes. The balance has to be found on land currently designated as open countryside and in an ideal world the lowest grade agricultural land would be developed first. However given the requirement for additional housing in all parts of the County, the distribution of lower grade agricultural land, and other constraints this is not always possible. The site is understood to be grade 3A land – part of the best and most versatile (grades 1 and 2 are the best). However the current agricultural tenancy on the land is coming to an end, the planning system cannot require it to be retained for food production and there is no control over how the land (and its grading) may be maintained in future.
- The LDP seeks to safeguard against coalescence and development must respond to the character of existing settlements. Considerable areas of accessible open space are proposed as part of new development and green barriers are to be incorporated into scheme layouts to mark and ensure separation between existing and planned expanded communities.

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- No significant ecological features have been identified on site – which is not uncommon for land in agricultural use. The important features are hedgerows which should be retained as far as possible in any future development scheme
- A strategic development of the size proposed would need to cater for a wider variety of house types and occupiers, including affordable and local needs housing e.g. for older persons
- Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the LDP Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land
- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account Any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA)
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as far as possible as part of any development proposal and form natural defensible boundaries
- The Council will continue to work with the key development partners to produce a detailed masterplan for the strategic site which will consider the issues raised through the consultation process.

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- Increased numbers cannot be attributed to the proposed strategic allocation near the former Felindre works site. The LDP may only attribute to each site the number of dwellings that can physically be built during the plan period ending 2025. In the case of Felindre whilst the site may have capacity for more than 1000 dwellings, only 850 units have been attributed for the plan period and this number will decrease the longer it takes the plan to be adopted. The requirement to provide land for housing clearly does not end in 2025 and the balance of the Felindre site will be built out during the plan period 2025-2040 and beyond. Indeed by the time the current LDP is approved there is only likely to be 8 remaining years of the plan period. This would mean on a site of 850 dwellings over 100 dwellings would need to be fully completed every year i.e. 2 per week, which is twice the average for a volume housebuilder. Transferring the number of dwellings proposed at Parc Mawr to the Felindre site would require development to proceed at four times the average build rate which is undeliverable, would not be accepted by the housebuilding industry, the Planning Inspectorate or Welsh Government and would consequently undermine the soundness of the plan. It is not an option.
- The Council commissioned Peter Brett Associates to undertake an Economic Assessment and Employment Land Provision Study in March 2012. The study provides a detailed evidence base for understanding the current supply in the market of employment land and buildings, as well as the requirements for future demand. The study indicates there is a sufficient supply of lower grade units within the County but identifies a requirement to bring forward higher quality facilities at key locations and to focus on regenerating land to provide strategic employment areas at Felindre, Fabian Way and Swansea West. The Study identifies the upper end growth scenario of 14,700 additional jobs. In reality growth may well be below this level, however it is the function of the LDP to make provision for the maximum level of growth to cover the plan period and beyond in to maximise regeneration opportunities and deliver economic aspirations. The Welsh Government have advised that failure to provide for this level of growth ‘...will have serious consequences for progressing Swansea as an Economic City Region...’ They further advise that they will if necessary exercise their powers under S.65(1) of the Planning and Compensation Act 2004 to direct the Council to meet the higher growth requirement.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site does not appear to have a suitable access to the highway network.</p> <p><u>Local Highway Conditions:</u> J47 interchange and the approaches suffer from considerable congestion during peak hours.</p> <p><u>Accessibility:</u> The site is within approximately 300m of Penllergaer roundabout where a number of services combine to give a frequency of 1 bus every 20 mins. There is 2 hourly service past the current site access.</p> <p><u>Wider Issues / Combined effect:</u> The site is likely to add significantly to current peak time flows and congestion.</p> <p><u>Restrictions:</u> The site does not currently have a suitable access and development traffic would add unacceptably to current local congestion. The site should not be considered for development until access can be provided and local improvements to the traffic flow at Penllergaer roundabout and J47 of the M4 have been improved.</p> <p><u>Transport Proposals:</u> Improvements to J47 traffic flows are necessary.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site contains potentially important Hedgerows protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerows quality.</p>
CCS Environmental Health	<p>No issues</p>
CCS Education	<p><u>Penllergaer Primary:</u> There is no capacity to accommodate increased numbers from these sites. Therefore there is a new school requirement for the area. NB there have been negotiations with one of the site developers at present to extend Penllergaer Primary (PG006), however the increased pupil numbers from all the developments would require a new school</p>

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	<p><u>Pontarddulais Comprehensive</u>: At capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Foul water drains to Gowerton STW. MOU issues. Check with DCWW on availability of foul network.</p> <p>Aerial photographs of the site show that this Strategic Site is crossed by a network of hedgerows, providing connectivity across the site. Any development should seek to maintain or replicate such opportunities. Given the size of the site an Extended Phase 1 survey / ES would be advised.</p> <p>WFD Moderate-Llan.</p> <p>Watercourses and springs appear to be present on site.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required.</p>

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	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth
Penllergaer Community Council	<p><u>In response to original submission:</u></p> <p>With regard to the overall potential for further residential development within the Penllergaer settlement, the Community Council would first draw attention to the Response by the City and County of Swansea to Proof of Evidence' submitted at the public inquiry held in regard to the Unitary Development Plan in April 2007. The conclusion, paragraph 4, states:</p> <p><i>It is acknowledged that Penllergaer is intended to be a growth area, however a significant release has already been made and there is only capacity in terms of infrastructure and settlement identity for one additional site of around 250 dwellings.</i></p> <p>This additional site of around 250 dwellings is in fact Land North of Llewellyn Road which was included in the UDP and submitted also for inclusion in the LDP (PG0006) and for which outline planning consent is currently being sought.</p>

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There have been no changes to the infrastructure in Penllergaer since 2007 and no upgrades are envisaged as far as the Community Council are aware. Therefore, it is the Community Council's view that until major improvements to the infrastructure are undertaken to adequately accommodate the rising volumes of traffic that regularly pass through Penllergaer to and from Junction 47, then no further residential development should be permitted.

The Community Council would also draw attention to the overarching issue of the lack of capacity at the Gowerton Treatment Works and the impact that this is having on the Burry Inlet which is a recognised European site with the status of a Special Protection Area. It is the Council's contention that no further residential development that could potentially impact on this protected site should be allowed in Penllergaer until the capacity of the Gowerton Treatment plant has been significantly increased.

The Community Council also wishes to point out that the majority of candidate sites for residential development in Penllergaer are in the Open Countryside (Policy EV20) and in designated Green Wedge areas (Policy EV23) as identified in the UDP. The Council would direct attention to Planning Policy Wales which states in Para 4.7.16 that:

'The construction of new buildings in a Green Belt or in a locally designated green wedge is inappropriate unless it is for the following purposes:

- Justified agricultural and forestry needs
- Essential facilities for outdoor sport and outdoor recreation, cemeteries and other uses land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purposes of including land within it
- Limited extension, alteration or replacement of existing dwellings
- Limited infilling and affordable housing for local needs under development plan policies
- Small scale diversification within farm complexes where this is run as part of the farm business.

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	<p>It is the Community Council's opinion that large scale residential development on green wedge land in Penllergaer would conflict with Planning Policy Wales' stated aims for green wedge use and would not, in any event, provide affordable housing for local needs</p> <p>The Community Council is also of the view that significant consideration should be given to the impact that further residential development would have on Penllergaer Primary School which is already over capacity. They have concerns not only in respect of the optimum size of a primary school in terms of best outcomes for children but also in regard to the associated traffic that would be generated by further housing developments. Penllergaer Primary is currently the catchment school for remoter parts of the Penllergaer ward, such as Parc Penllergaer, and is also in catchment for Tircoed Village which is likewise remote and in the Llangyfelach ward. The distance of these developments from the school gives rise to large scale car use and massive issues around traffic management and road safety both morning and afternoon in the areas closest to the school. Further residential development, especially those remote from the school, will only exacerbate these already difficult problems.</p> <p>In conclusion, the Community Council would request that the contents of this letter and accompanying documents are examined and fully considered during the assessment process of candidate sites as they represent a reflection of the residents' views evidenced at three public meetings held in Penllergaer in respect of the LDP.</p> <p>PG0002 Land at Parc Mawr Farm 12.0 Hectares Current Use: Agriculture Proposed Use: Residential</p> <p>This site was rejected for inclusion in the IHLPS, the conclusion being in the Site Assessment Statement (Ref. CCS090) that it would represent a substantial release of green field land and would have an adverse visual impact.</p>
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It was also excluded from the UDP and the Community Council would make specific reference to the Response by the City and County of Swansea to Proof of Evidence April 2007 and the reasons provided by the City and County for the exclusion of this site from the UDP. In particular, attention is drawn to Para 3.2 Appendix 3, sub Para 2.15 (i) which states that if land at Parc Mawr were released

It would immediately put land to the west and adjoining access road under pressure for development. If the agricultural unit subsequently proved unviable there would be further pressure to release land extending south of the current settlement, therefore contributing towards coalescence.

This is further backed up by Para 2.5(iii) safeguarding the countryside, which states that the omission site is in an area of open countryside and that

It is certainly not perceived as being part of the urban form as evidenced by the attached aerial photograph. Furthermore, as the land is located in close proximity to the M4 it will remain under constant pressure for development: hence the extra protection of green wedge is essential.

Para 2.15(iv) refers to protecting the setting of the urban area and to the fact that

The open rolling farmland character of the land to the south of Penllergaer and viewed to the rear of properties fronting Swansea Road and Gorseinon Road would be fundamentally changed should this area be released for development.

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There are several other comments that support the above and in Para 3.3 sub paras 3.11 to 3.12 it is stated that

The current attractive low density mix of property types extending in linear form along Gorseinon and Swansea Roads enjoying a rural aspect to the south/west would become dominated by high density backland development that would urbanise the area and provide little in the way of benefit to the local community.

The Community Council would contend that the reasons submitted by the City and County of Swansea for maintaining Green Wedge status and excluding Land at Parc Mawr Farm from the UDP and also from IHLPS, remain as valid now as they did in 2007 and that no residential development should be permitted in this location.

The Community Council would also advise that the Land at Parc Mawr Farm was last assessed as Grade 3A agricultural land in the summer of 1981 and has continued to be improved since this time. Evidence was given at a Public Inquiry, held in June 1981, by the Agriculture Department, Welsh Office, which confirmed that land at Parc Mawr has been inspected and graded in accordance with agricultural land classification and that the entire area fell within Grade 3. The statement then added that the land demonstrably fell into the best half of the grade 3 classification, sub-grade A. The Community Council believe that it would therefore be inappropriate to consider residential development on land having this agricultural classification in view of the protection that is now being sought in England for land with a similar status.

The Community Council would also refer to the fact that the hedgerows in Parc Mawr are diverse in terms of habitat structure and species and therefore qualify as Important Hedgerows under the wildlife criteria of Hedgerow Regulations 1997. There is evidence of reptiles such as slow worms in the grasslands and bats roost in the larger trees. There is also occurrence of foraging badgers. All of these are protected species.

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Penllergaer Community Council

In response to Preferred Strategy:

1.1. The Community Council is responding on behalf of residents to the housing development proposals for Penllergaer as contained in the Preferred Strategy.

1.2. Following a public meeting in early September and several subsequent meetings of an Action Committee, set up to consider the detail of these proposals, the Community Council's opinion is that a further thousand houses or more in Penllergaer is unsustainable and therefore unacceptable for the reasons detailed in this submission. In making this objection, the Community Council is reflecting the views and concerns of residents and also the conclusions of the Action Committee, members of which have carefully examined the implications of a major extension to Penllergaer.

1.3. The Community Council feels strongly that the Bellway Vision seems deliberately to underemphasise the robustness of the existing community. For example, on page 4 of the Vision for Penllergaer is the comment that the village does not benefit from a clear centre. That seems an ill judged remark to make given that the church, the pub, one of the community halls, a convenience store within the filling station and the sports field are all sited within a short distance of each other on or just off Swansea Road. Close by is the school, another community hall and also Gors Common. This area clearly constitutes the centre of the village and all large scale community events - such as the Jubilee celebrations in 2012 and the Community Fun Day in July of this year - take place on the sports field, in the Llewelyn hall and in the spacious sports pavilion.

1.4. The Community Council therefore believes that Penllergaer is well provided for in terms of facilities and is fully sustainable without the need of a further 1,000 homes to create a new and unnecessary focus.

1.4 The Community Council therefore objects on behalf of residents to the proposals contained in the Preferred Strategy and the reasons for its objections are expanded below.

2. Economic and Employment

2.1. First and foremost, the Community Council remains unconvinced by the arguments for growth as set out in the background paper Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot.

2.2. The base forecast for the Swansea economy 2015-25 is for 6,100 new jobs. It is only after various adjustments and the potential for policy interventions that the upper end growth scenario of 14,700 is reached but it is on this figure that the required number of new homes appears to be predicated. It states in paragraph 1 page 6 of the Economic Assessment 'Based on the number of extra workers that would be required to match the number of additional jobs without needing to increase in-commuting along with meeting the Council's objectives for raising local economic activity levels and reducing unemployment, it is estimated that a net additional 16,421 homes would be required within the County over the plan period'.

2.3. In the Community Council's view 14,700 new jobs is an over optimistic and unrealistic assessment of future job prospects for Swansea. It follows, therefore, that the need for 16,700 new homes is also likely to be overstated.

2.4. The City and County also seem to share concerns about the future job prospects for Swansea and comment in Improvement Objective 5 in the Annual Review of Performance 2012-2013, page 32 that 'Further spending reductions are likely to take place meaning that the public sector is expected to shrink. Cities like Swansea that are reliant upon public sector employment are particularly vulnerable. It then adds The City and County of Swansea will need to prepare for the consequences of further reductions to the size of the public sector workforce.

2.5. The evidence produced in the Economic Assessment, referred to above, likewise makes reference to Swansea's dependency on public sector jobs and also points out that in regard to the working population of Swansea, which is 150,100, there are 75 jobs for every 100 residents of working age. This suggests that 25% or 37,525 of working aged people in Swansea are not in employment. Interestingly, however, the number of registered job seekers is only about 5,000. However, even making allowances for those not working for various legitimate reasons - stay at home mothers and long term illnesses, for example, there would appear to be sufficient unemployed working aged people already in Swansea to fill the minimum number of new jobs i.e. 6,100, and even the upper figure of 14,700. It would also seem reasonable to conclude that the 37,523 of working aged people not currently in employment are nevertheless already living somewhere in Swansea and, in the unlikely event of a future jobs explosion, would be available to take up some of the vacancies without the need to move into a new home.

2.6. The Community Council therefore considers that more work needs to be done on future job growth in Swansea and the higher figure of 14,700 modified to take account of the City and County's more gloomy forecasts in this respect.

### 3. Sewerage

3.1. The lack of capacity at the Gowerton Treatment Plant is well documented and is acknowledged within the Preferred Strategy. Specific problems in Penllergaer are highlighted in Topic Paper - Physical Infrastructure - Para 2.39 - as this area has one of the highest numbers of recorded sewer flooding incidents caused by overload across Swansea.

### 4. Traffic

4.1. The volume of traffic travelling through Penllergaer to J47 is a matter of huge concern to residents. The Community Council is aware that, whilst J47 is not yet quite at full capacity at peak times, there are increasing traffic pressures at this junction with regular queuing on both the north bound lane of the A483 and the approach from the west along the A48.

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4.2. However, of greater significance is the impact that a further large scale housing development would have on traffic volume on the A4240 (Gorseinon Road - a residential road for much of its length) and the Penllergaer roundabout.

4.3. Bellway acknowledges the traffic problems in its Vision for Penllergaer Page 7 by confirming that Gorseinon Road is at saturation during peak periods and that the Penllergaer Roundabout is operating at capacity. This would seem to be an under estimation of the situation in regard to the latter, as at peak times it is operating well over capacity and is not considered by City and County traffic engineers to be capable of handling a further increase in traffic.

4.4. The Community Council recognises that the Bellway Vision for Penllergaer incorporates a new road to link from a point on Gorseinon Road to the A484 in an attempt to relieve this congestion, but remains unconvinced that this would be the realistic outcome. Whilst it may be reasonable to argue that many occupants of homes on the Parc Mawr site would work in Swansea and would thus head south on the new link road in, say, the morning peak, a substantial proportion would relocate to this area specifically because of its convenience for J47 and the M4, and their places of work along this strategic corridor.

4.5. This fact is very clearly evidenced in the breakdown figures in the Ward Profile for Penllergaer July 2012 (Page 9.) Out of 1,078 people (2001 figures as the full scope of updated 2011 census figures is not yet available) aged between 16-74 who are described as economically active (includes 47 unemployed and 38 full time students) a total of 238 work Out of County - Bridgend, Cardiff, Carmarthenshire etc and 176 work in employment destinations within the City and County of Swansea that involve travelling along the M4 or the A48, such as Llangyfelach, Morriston, Llansamlet, Clydach, Landore, etc. In all, it is reasonable to assume that 40.83% of the working population of Penllergaer use the M4 and A48 (to Llangyfelach) to reach employment as opposed to travelling into Swansea via the A483. There is no basis to believe that any future residents of a development at Parc Mawr would buck this trend. The Community Council would also argue that such new residents

would be likely to favour Gorseinon Road as their route of access to J47 rather than the more circuitous option south to the A484 and then north on the A483. This would add significantly to the congestion at the Penllergaer roundabout.4.6. Furthermore, the Community Council believes that three out of the four optional access points onto Gorseinon Road for the proposed new road, as identified in the Bellway Vision, are unlikely to be achievable in terms of traffic management and road safety. That would leave the existing access point onto Gorseinon Road from Phoenix Way as the only viable option.

4.7. The Community Council has also undertaken a further assessment of potential traffic growth on Gorseinon Road in regard to new builds west of Penllergaer - in Gorseinon, Penyrheol and Loughor. Approximately 121.619 hectares of land has been put forward as candidate sites for residential development in these locations. If only 50% of this land is ultimately developed that would total about 60 hectares. At a minimum build of 30 houses per hectare the potential is for over 1,800 new homes, and at least a proportion of occupants are likely to be heading to employment along the M4 via Gorseinon Road, the Penllergaer roundabout and J47. The Community Council therefore believes that this potential must also be factored into future traffic impact assessments.

4.8. Pressures on Gorseinon Road at peak times have an inevitable consequence for the A48 Pontardulais Road and traffic from Pontlliw and further north. Priority on the Penllergaer roundabout is for traffic from the west (Gorseinon Road) and therefore lengthy queues form along Pontardulais Road with drivers unable to access the roundabout because of the constant flow of vehicles. The Community Council does not believe that the proposed new link road in the Bellway Vision will in any way reduce the volume of traffic along this road and therefore supports a solution that would take traffic from the north directly to J47, thus entirely avoiding travel through Penllergaer.

4.9. The Community Council supports an Origin and Destination survey and believes it is vital that the capacity of the Penllergaer roundabout is properly assessed during this process.

4.10. The Community Council would also point out that a former Head of Transportation at the City and County confirmed (Proof of Evidence re Bryn Dafydd Farm para 5.17) that he would not support a strategic highway access from the strategic highway network (either from the A483 or A484). The imposition of a new junction at this point would adversely affect the operation of this section of highway, which was constructed to provide a fast and direct route from central areas of Swansea to towns and communities further west.

4.11. The Community Council endorses this statement and believes that any proposed new access onto either the A483 or A484 should continue to be resisted.

#### 5. Agricultural land

5.1. In terms of its agricultural value, Appendix 1a Agricultural Land Classification shows the situation in regard to the whole of Wales. It is clear that higher quality agricultural land - Grades 1 to 3 - is in short supply with the greater proportion of land in Wales designated lower Grades 4 or 5.

5.2. Appendix 1b shows the Agricultural Land Classification for the City and County of Swansea and Appendix 1c, the land classification in Penllergaer including that at Parc Mawr farm. It can be clearly seen that the latter is assessed as Grade 3

5.3. Furthermore, Appendix 1d indicates that at least part of Parc Mawr farm was identified as being subdivision Grade 3a and was one of the reasons for the refusal at a planning appeal in 1981 in regard to a small residential development at Parc Mawr. Evidence was provided by a representative from the Agriculture Department of the Welsh Office who informed the Inquiry that the entire land area put forward for development at that time - 4.5 hectares - was Grade 3 and 'demonstrably fell into the best half of Grade 3 classification sub-grade A. It was also pointed out that 'some 45% of the agricultural land area of the then West Glamorgan was of a quality less than that of the appeal site. Additionally, it is worth noting that this land received EU grants - as much as £95,000 in the late 70's and early 80's - for general improvements.



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5.4. Planning Policy Wales states that land graded 1, 2 and 3a should be conserved as the best and most versatile land and a part of Parc Mawr clearly fell within these parameters in 1981.

5.6. In contrast, current advice from the Natural Environment and Agriculture Team, Land, Nature and Forestry Division, Welsh Government is that the differentiation between Grade 3a and 3b does not exist for the majority of areas post 1988.

5.7. Additionally, the Community Council believes it is salient to point out that prior to the UDP, Post Inquiry Modifications 2008, an amplification for Policy EC13 was included which recognised the lack of good quality agricultural land in Swansea and embodied this in the following paragraph, then noted as 2.5.13: The County does not have any top quality agricultural land of grades 1 & 2 outside the Gower AONB with poor quality farmland predominating. In these areas of poorer farmland, subgrade 3b is considered to be locally valuable to the agricultural and rural economy. Accordingly it is included as part of the 'best and most versatile land' within the County'.

5.8. The Community Council notes too that in the Response by the City and County to Proof of Evidence 2007 page 6 sub para 2(iv), the City and County regarded land at Parc Mawr farm as protecting the setting of the urban area, stating that the open rolling farmland character of the land to the south of Penllergaer and viewed to the rear of the properties fronting Swansea Road and Gorseinon Road would be fundamentally changed should this area be released for development.

5.9. It also suggests on Page 5 sub para 2.15(i) that loss of agricultural land could lead to the agricultural unit proving unviable. This indeed would be the inevitable outcome of the release of this land for a thousand houses.

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5.9. With reference again to the Planning Inquiry in 1981, when residential development was refused at Parc Mawr, it should be noted that in his conclusions the Inspector commented that the appeal site appears not as a small pocket of land mostly surrounded by residential development but an integral part of the extensive agricultural lands which abut development fronting Gorseinon Road and Swansea Road and extend to the south and west. The effect (of residential development) would be to extend considerably the built up area of Penllergaer into an area of predominantly open countryside. (Appendix 1e) The land at Parc Mawr remains largely as it was in 1981.

5.10. However, there has already been some loss of greenfield, agricultural land in Penllergaer as a consequence of the UDP with over 7.8 hectares being given for the development of 246 houses at Parc Penderri and Broadwood. A similar area of farm land has also been allocated for 200 houses North of Llewelyn Road for which outline consent has already been lodged.

5.11. The Community Council believes that if a local food policy is to be developed for Swansea, as has been mooted, then it is important that pockets of Grade 3 agricultural land such as at Parc Mawr farm should be retained. Therefore, in the interests of future sustainability and in order to protect the open countryside, there should be no further loss of better agricultural land to housing developments when that of a lesser quality is available in greater quantities elsewhere.

5.12. Some recent photographs, (Appendix 1f), show that Parc Mawr is being farmed as grazing land for cattle and also for crop growing.

6. Wildlife and Biodiversity

6.1. A revised ecological survey was conducted of Parc Mawr farm in 2007 when land was put forward for inclusion in the UDP and an inquiry was held. This survey concluded that in terms of the ecological evaluation of the site, a large area was of District Value as opposed to the lower level Local Value (Appendix 2a.) This Ecological Plan also shows smaller areas of land that were regarded of High Local Value.

6.2. It was stated in the report Wildlife and Biodiversity Statement of Case, para 3.1 that the southern and western parts of the site were considered to be Distinct Value for nature conservation by virtue of its extent, the presence of a local plant (whorled caraway), local invertebrates (e.g. black darter dragonfly) and their overall species-diversity. In combination with the surrounding hedgerows and scrub features, these grasslands are considered to form part of a larger coherent unit of habitats which is collectively assessed as being of high ecological value.

6.3. Conveniently, in 2007, the area of land assessed as of District Value was not part of the proposed UDP allocation site. However, in terms of the Preferred Strategy and Bellway's Vision for Penllergaer, it clearly is.

6.4. The Community Council also notes the reference to Green Infrastructure in the Preferred Strategy (page 59, Para 7.24 and 25) and agrees with the statement that Development that unacceptably compromises the extent and quality of green infrastructure provision will not be supported.

6.5. In its view, land at Parc Mawr farm forms a significant tract of open countryside on the urban fringe where there is clear evidence of high biodiversity, making it of considerable ecological value and an important part of the green infrastructure.

	<p>7. Green Wedge</p> <p>7.1. The land at Parc Mawr farm also forms part of the Green Wedge as designated in UDP Policy EV23, and amplification 1.7.5g and based on Planning Policy Wales Guidance</p> <p>7.2. Whilst the Community Council acknowledges that Green Wedge boundaries can be redefined to reflect changes in strategic policy it would point out that the City and County robustly defended the Green Wedge designation for land at Parc Mawr in its response to Proof of Evidence at a public inquiry as recently as 2007.</p> <p>7.3. In the Response by the City and County to Proof of Evidence, April 2007 para 3, (entitled The Council's Response) page 5 sub para 2.15(i) Green Wedge designation is cited as important for the 'Prevention of coalescence. It acknowledged that the proposed omission site would not in itself lead to coalescence between Penllergaer and Fforestfach. However, development of the larger site area would and the Council considers the proposal to be the thin end of a very large wedge. If the omission site was released as proposed, it would immediately put land to the west and adjoining access road under pressure for development. If the agricultural unit subsequently proved unviable there would be further pressure to release land extending south of the current settlement limits, thereby contributing to coalescence. (Appendix 3a)</p> <p>7.4. It goes on to say that the Green Wedge is an important tool to manage the urban form and that in this location, the frontage development on Swansea Road and Gorseinon Road limits the development to the rear. A breach of this containment would open up the possibility of further development to which there would be no defensible boundary. Para 2.15(ii)</p> <p>7.5. In para 2.15(iii) there is reference to safeguarding the countryside. It states that Parc Mawr farm is part of the open countryside. It is certainly not perceived as being part of the urban form. Furthermore, as the land is located in close proximity to the M4 it will remain under constant pressure for development: hence the extra protection of Green Wedge status is essential.</p>
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7.6. In the Community Council's view the arguments used by the City and County in 2007 - only six years ago - for the retention of the land Parc Mawr within the Green Wedge were robust and logical. It would therefore be difficult for the community to understand the justification for any change in this position.

7.7. Also included in Appendix 3b are some relevant comments from the City and County of Swansea UDP Inspector's Report.

In para 5.2.28 he states that I consider the Plan approach of restricting the releases of further greenfield sites on the urban fringe and of seeking to resist urban expansion pressures, to protect the form and setting of settlements and to prevent coalescence, is well merited. In consequence, I consider that the green wedge designations proposed by the Plan are not excessive or overly prohibitive, and should be adopted as integral to the overall development strategy of the Plan.

#### 8. Education

8.1. The Community Council notes that the Bellway Vision would deliver a new primary school for Penllergaer. It should be remembered, however, that the existing school, to replace the one constructed in the 1890's was built less than 40 years ago and traditionally served only the community of Penllergaer. Pressures within Penllergaer itself from new developments have therefore been successfully absorbed. However, the catchment area was extended some years ago to incorporate Tircoed village which is well outside the ward boundary. There are now some 104 children attending Penllergaer Primary from this large housing estate.

8.2. With regard to another new school, clearly this would be needed if one thousand houses were to be built in order to accommodate at least a further 200 or more children, using the current formula. The Community Council would question whether a very large primary school with the potential of over 600 children is either desirable or appropriate.

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8.3. The Community Council would also point out that the feeder comprehensive for Penllergaer is not Penyrheol as seems to be suggested in the Vision but Pontardulais which is already at capacity. What additional provision will therefore be made for post 11 year old children?

9. Alternative housing locations

9.1. The Community Council believes that for the reasons indicated above, no further large scale housing development should be located in Penllergaer. Instead, it considers that the urban village proposed for Velindre should be extended to accommodate at least 2,000 homes in order to ensure that this new community is fully sustainable and capable of supporting the facilities that are described as going to be delivered. It is a 100 hectare greenfield site so well able to accommodate over 3,000 homes. The Welsh Government, who own the site, have indicated that it could provide a mix of affordable and private housing with associated community facilities including schools and leisure opportunities, to offer 'a destination with a strong sense of place and community' and has funded a feasibility study to be submitted as part of the LDP process.

9.2. From the agricultural classification - see Appendix 1a - it is clear that the land is Grade 4 so of a lesser quality than at Parc Mawr farm. The site could also have the benefit of direct access onto the A48 and M4 motorway at J46. The Welsh Government has already invested £11.7m for infrastructure in this location to stimulate interest in the brownfield, 60 hectare employment site adjacent to the proposed urban village.

9.3. To illustrate the need for a community to be of a sustainable size, the Community Council would point out that in Penllergaer, the number of dwellings currently (and inclusive of a completed Parc Penderri) is just over 1,400. With a potential build north of Llewelyn Road, that number will increase to in excess of 1,600 households.

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9.4. In terms of amenities, Penllergaer already has a church, a school, a well used pub and two community halls. The Llewelyn Hall - funded by a lottery grant and built to replace an old and dilapidated church building, is situated on Swansea Road. A short distance away, the former Victorian school building on Pontardulais Road is also a community building, referred to as the Village Hall, which accommodates a full time day nursery and a room for other community activities. This hall is owned and managed by the Community Council who also built, owns and runs a large pavilion together with a sports field consisting of two football pitches and a cricket pitch. The intention is to provide further sporting opportunities on this complex.

9.5. To enable the Community Council to sustain its facilities and to provide floral displays, some funding towards the maintenance of the graveyard and to various community organisations, it sets a modest precept of around £32,000 a year which is shared across the households in the ward.

9.6. Thus, in the Community Council's view, bearing in mind the likely financial climate of the future, those living in any new urban village will themselves inevitably be required to manage and maintain most of the facilities, delivered as part of the overall development. It follows from this that the number of dwellings required to generate the necessary funding must be at a level that ensures that the financial burden on individual households, which will be in addition to the Council Tax, is kept at a minimum. Thus, in the Community Council's opinion, the financial and managerial sustainability of community facilities of the kind to be delivered in any new urban village will need to be brokered on larger size developments than just one thousand homes.

9.7. The Community Council would also point out that the district railway line runs close to Velindre and would view this as offering the opportunity to provide a sustainable alternative travel connection between the new urban village and elsewhere.

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9.8. The Community Council also considers that a further more sustainable option for additional homes is on land adjacent to Tircoed and is aware that a development proposal was submitted at this location during the previous UDP process. The present isolated community of 480 homes has few facilities - a shop and a small hall - with 104 children attending Penllergaer Primary school adding to its accommodation pressures. It notes that currently households are paying as much as £75 per annum towards the running of a Trust which is responsible for the maintenance of the village hall and the general upkeep of the area as a whole. More homes could generate the funding needed to improve village amenities, with the additional benefit of potentially reducing the financial charge on each individual household.

9.9. The Community Council believes an enlargement of Tircoed could also provide the opportunity of a direct access to J47 thus reducing the traffic congestion in Penllergaer that occurs along Pontardulais Road. This would mean noise, nuisance and disturbance on what is a long established residential road could be brought down to a more acceptable level. Such a link could be provided directly from an extended Tircoed Village - or off the A48 north of the M4 motorway bridge - to the northern arc of J47 thus taking traffic away from Penllergaer entirely.

9.10. In conclusion, the Community Council, with the full support of the Action Committee, believes that any further large scale housing development in Penllergaer should be resisted and that the proposed one thousand new homes can be successfully and more appropriately accommodated elsewhere.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	n/a	+1	+2	+2	?	-2	n/a	+2	+1	+1	n/a	n/a	+2	0	n/a	-1	+1	-1	-1	n/a	?	+2	+1



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Stage 3B: Assessment Against SEA/SA Objectives

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	++	0	+	++	0	?	+/-	--	+/-	?	-	+/-	X	+/-	?	?	--	?	?

# Strategic Masterplan

The vision is to provide an integrated addition to Penllergaer as a sustainable walkable neighbourhood, helping to create an improved focus for the area and enhanced links to new and existing facilities. The initial concept masterplan (opposite) illustrates the potential broad form of the development. Several alternative highway connections to Gorseinon Road are indicated:

- A connection via Phoenix Way;
- A connection via Orchard Grove;
- A connection to the Gorseinon Road/Llewellyn Road junction; and
- A connection to Gorseinon Road opposite the village green

While the body of the development site measures c.50 hectares (125 acres), it is anticipated that around 24 hectares (59.3ac) of residential land will be provided. The strategic allocation would deliver:

- c.1000 new homes;
- a new primary school of c.2 hectares with high quality foot/cycle connections and helping to relieve issues along the A48;
- new community facilities, the make-up of which is to be determined but could include health care, local shops, and a cafe;
- further recreational space for the village; and
- a link between the A4240 Gorseinon Road and the A484 Llanelli Link Road to the south (four connection options illustrated right).

Significant areas will be retained as green infrastructure within the development. These would provide attractive opportunities for recreation, green corridors, new and retained planting and surface water drainage features. This could include additional sports facilities and/or opportunities for local food production as appropriate.

## DEVELOPMENT

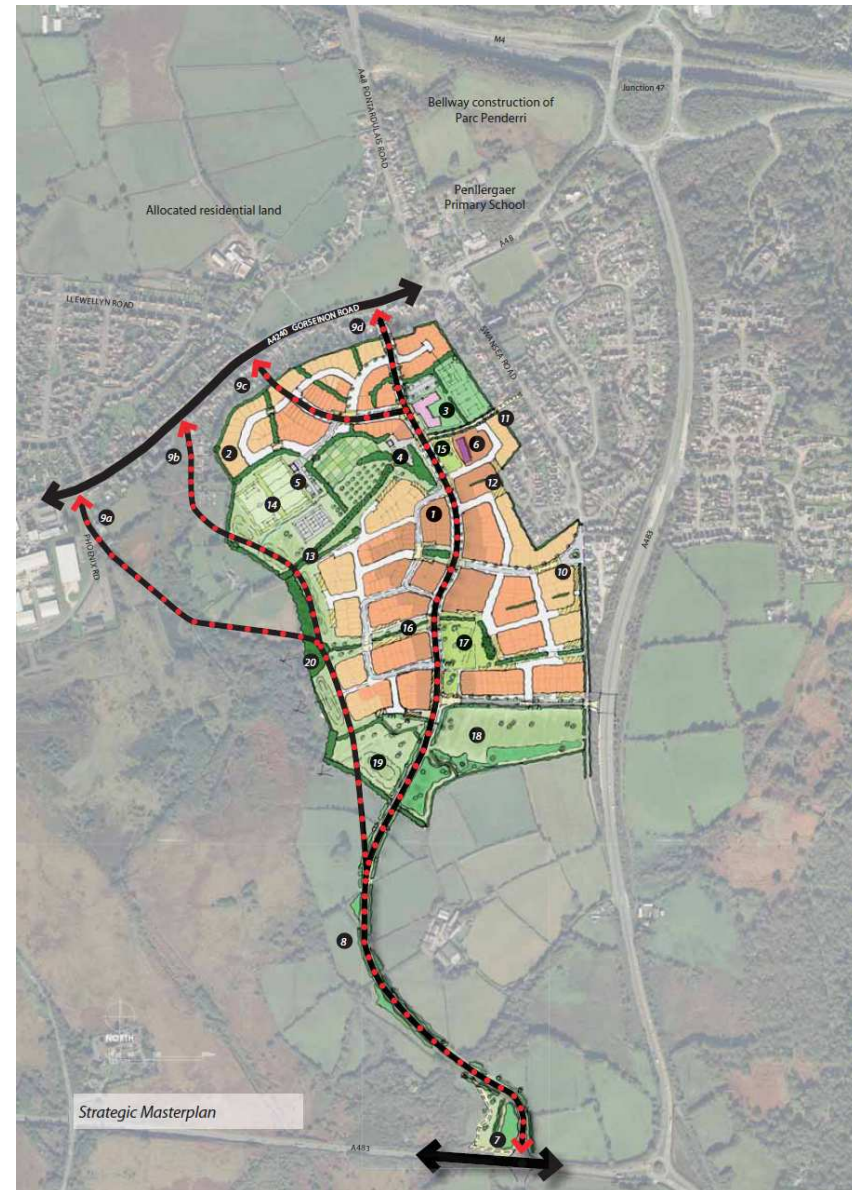
- 1 Higher density residential development to centre of site
- 2 Lower density residential development towards edges of site
- 3 New primary school with good foot/cycle links
- 4 Retained farmhouse with potential for community use
- 5 Changing rooms for sports pitches
- 6 Local centre uses alongside the primary school

## ACCESS

- 7 New junction with the A484 and connection to the link road southwest to the Alcoa candidate site
- 8 New link following topography and lined by new planting
- 9a Connection option 1 to Gorseinon Road via Phoenix Road
- 9b Connection option 2 to Gorseinon Road via Orchard Grove
- 9c Connection option 3 to Gorseinon Road/Llewellyn Road
- 9d Connection option 4 to Gorseinon Road and village green
- 10 Bus access from Swansea Road, with vehicular access to a limited number of dwellings
- 11 Foot/cycle access from Swansea Road
- 12 Foot/cycle connections to Brynrhos Crescent
- 13 Foot/cycle connections to Public Right of Way to the west

## GREEN INFRASTRUCTURE

- 14 Potential recreation complex – sports pitches/changing rooms/allotments/community orchard/natural play as part of a northern west–east green corridor
- 15 Village green providing focal space along primary street within development
- 16 Retained planting within southern west–east green corridor
- 17 Pocket park with play area providing a focal space
- 18 Green edge creating parkland setting
- 19 Drainage features as part of a network of blue infrastructure on the lower slopes
- 20 New and retained planting on development edge



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<b>Reference</b>	<b>PG004</b>
<b>Name</b>	<b>Land at Penllergaer Civic Offices</b>
<b>Description</b>	Council offices and car park set within Penllergaer Historic Park and Gardens located SE of M4 Junction 47. The site is bounded by Penllergaer Valley Woods to the east but, significantly, cut-off from the main settlement of Penllergaer by the A483 dual carriageway along the western boundary, across which there is no pedestrian access. Highways access is achieved from the A48 to the north. To the south lies the outlying residential development of Parc Penllergaer with no connection through. The offices are located to the south of the site bounded by associated car parking areas that respect the woodland setting. There is an ancient monument (observatory) centrally located within the site.
<b>Size</b>	6.508 Ha
<b>Existing Land use</b>	Offices, Car Park and Parkland
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



**Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

4 letters of objection were received which are summarised below:

- Grade II registered park and garden of historic interest
- Area contains Listed Buildings and Ancient Monuments
- Dominates and partially controls access to Valley Woods
- Adverse impact on pollution
- Increased traffic/congestion
- Flood risk
- Increased noise
- Adverse impact on wildlife/habitat
- Adverse impact on health and wellbeing
- Loss of green space
- Should be no net loss of woodland to ensure ecological networks are maintained and enhanced
- Buffer zones are essential to reduce the impact of damaging edge effects and ensure their sustainability is to be improved

2 letters of comment were received which are summarised below:

- Important that any development does not lead to tree loss and that the listed observatory is not compromised
- Any development should be in keeping and work alongside the Penllergare Valley Woods plan.

**LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### LDP Draft Proposals Map Consultation: Summary of Representations

2 further letters of objection were received which are summarised below

- Woodland should be retained and buffer zones provided to future development
- Small site isolated from main village of Penllergaer not suitable for residential development
- Footbridge over A483 needed to interconnect Penllergaer village, Parc Penllergaer and Valley Woods parkland.
- The east boundary of PG004 should be redrawn to exclude significant features of the registered Penllergaer Park and Garden including the site of the former mansion the observatory and the garden area to the SE corner

### Response to Representations

- There are a number of site/context constraints which will need to be factored into any (re)development proposals including the Historic Park and Garden Setting, scheduled ancient monument and ancient woodlands. A high level of protection is afforded to the preservation and safeguarding of historic features and their settings. This does not preclude development proposals from being brought forward, however significant prior assessment and evaluation must be carried out and appropriate mitigation measures undertaken if development is considered appropriate.
- The site plays a key role in improving local accessibility. It can facilitate a pedestrian access link (footbridge) to the main settlement of Penllergaer; it could also provide a footpath link through to the Parc Penllergaer development to the south and improve access to and compatibility with the Valley Woods to the west. This would enable more sustainable movement around the area and increase recreational (health and well being) opportunities
- Local congestion issues would need to be addressed as part of any development proposal together with access improvements. Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority
- Site currently lies outside the settlement boundary and is not part of the greenspace system. Incorporation of the site within a revised settlement boundary as part of redevelopment scheme would require the retention of woodland areas and actually increase the amount of open access land that is available



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- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account Any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA)
- Not fluvial flood risk area, but issues with surface water flooding to the northern part of the site which would need to be addressed. Sustainable urban drainage scheme (SUDS) will need to be incorporated into development schemes as necessary. All new development needs to demonstrate that greenfield run –off will be achieved. No increase in surface water run-off would be permitted
- Development would not necessarily generate any additional traffic (pollution/noise) than the existing office use at the site. The planning application process would not permit development that would result in harmful levels of pollution
- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as far as possible as part of any development proposal and form natural defensible boundaries

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: The site has an established access from the A48.</p> <p><u>Local Highway Conditions</u>: J47 interchange and the approaches suffer from considerable congestion during peak hours.</p> <p><u>Accessibility</u>: There is an hourly frequency past the site.</p> <p><u>Wider Issues / Combined effect</u>: The site may add to current peak time flows and congestion in the area.</p> <p><u>Restrictions</u>: The site is not suitable for a high traffic generating development until local congestion issues have been addressed. Access improvements may be required.</p> <p><u>Transport Proposals</u>: Improvements to local traffic flows may be necessary.</p> <p><u>Further comments</u> on proposed connection to Penllergaer</p> <p>Residential use would generate exiting traffic in the morning peak which is difficult from the site when the main road is busy. There may be a need to consider some form of traffic control at the access junction. Comments on local congestion at J47 would still apply.</p> <p>With regard to the pedestrian link issue, there is a presumption against bridges as they are less inviting and a preference for at grade crossings, however, crossing the A483 would be particularly difficult and so addressing the linkage issue is probably critical.</p> <p>In terms of traffic capacity and road safety would favour a pedestrian /cycle bridge link across the A483. In addition access /egress from the site onto the A48 would need to be improved; perhaps with the introduction of a roundabout at the access There is also opportunity to link this in to onward routes in order to make its use sustainable.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4,700 homes are needed within this strategic housing policy zone over the LDP period.</p>

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CCS Biodiversity	<p>This site contains; Lowland Mixed Deciduous Woodland, which is a habitat of principal importance for the conservation of biological diversity in Wales under the Natural Environment And Rural Communities Act (2006).</p> <p>Priority species recorded on the site are; Song thrush, which is a species of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p> <p>Species of contributory concern recorded on this site; Goldcrest and Barn owl.</p>
CCS Environmental Health	Possible noise conflict with M4
CCS Education	<p><u>Penllergaer Primary</u>: There is no capacity to accommodate increased numbers from these sites. Therefore there is a new school requirement for the area NB there have been negotiations with one of the site developers at present to extend Penllergaer Primary (PG006), however the increased pupil numbers from all the developments would require a New school</p> <p><u>Pontarddulais Comprehensive</u>: At capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
Corporate Property	<p>Site has the potential to be retained for office use as well as having potential for redevelopment for various alternative uses, such as residential, leisure, hotel, public house/restaurant</p> <p>Market demand exists for the whole of the site</p>



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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Some of the woodland within the site boundary appears to be classified as Ancient Semi-Natural Woodland (ASNW).</p> <p>Foul water drains to Gowerton STW. MOU issues.</p> <p>Aerial photographs show that much of the site is dominated by mature woodland. BAP Habitat. Buildings and mature trees should be assessed/surveyed for suitability for bats. Nearby records for badger. Likely to be utilised by bats.</p> <p>WFD Moderate-Llan</p> <p>The River Llan lies to west of the site and Zone C2 follows this river.</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

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	<p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer and a SPS for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
CADW	Land at Penllergaer Civic Offices is an area where there is an extant office building with extensive car parking located inside the registered park and garden. The observatory building is also a scheduled ancient monument (Cadw ref: GM410). The candidate site area includes Penbwl Wood as well as the office building and car parks. The wood is part of the historic park and therefore any allocation for this candidate site should be confined to the area of the offices and existing car park and will also need to consider the need to protect the setting of the scheduled monument.
Penllergaer Community Council	<p>Significant concerns in respect of residential development in this location. It is remote from the main settlement of Penllergaer and it is unclear how pedestrian access could be achieved. Any residential development is likely to exacerbate the traffic problems on Junction 47 and contribute further to the difficulties around the primary school. Regard should be given to the historical importance of this site, designated Policy EV11 in the UDP, that contains the Equatorial Observatory which is a Scheduled Ancient Monument. With regard to hotel and office use, the Community Council would view increased traffic at Junction 47 a reason for concern.</p> <p>Subsequent Site Specific Comments on the Draft Proposals Map The Community Council is aware that the whole site is registered at Grade 2 as a park and gardens of special historic interest under Reference PGW(GM)54(SWA). Of particular importance is the Equatorial Observatory which is both listed and scheduled as an ancient monument (GM410) and which must at all times be protected against the impact of development.</p>

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The Community Council is of the opinion that there should be no residential development on this site which would be in a location remote from the centre of Penllergaer. It would therefore be car dependent with the only available safe walking route currently via Parc Penllergaer, already a substantial distance from community facilities. Whilst the shortest walking route would be across the A483 close to J47, this is an extremely busy dual carriageway at all times and the installation of a pedestrian crossing would seem unrealistic in terms of traffic flow and concentration, potentially adding to delays and queuing at an already overloaded junction..

The Community Council are also concerned that the remaining part of Penbwl Woods, a historic area linked to the estate of the Dillwyn Llewelyn family, is likely to be further eroded and destroyed. It would seem inevitable that many mature trees, worthy of protection, would be felled and that there would also be a concomitant loss of wildlife.

The Community Council therefore objects on the behalf of resident to any residential development in this location.

**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	?	-2	n/a	?	-1	n/a	+1	0	n/a	n/a	n/a	+2	0	n/a	-1	-1	-2	-2	n/a	?	-1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	+	0	+	-	0	?	-	+/-	+/-	?	+	-	X	-	?	?	++	--	+/-

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<b>Reference</b>	<b>PG006</b>
<b>Name</b>	<b>Land North of Llewellyn Road, Penllergaer</b>
<b>Description</b>	The site comprises land either side of two pasture fields recently granted planning permission (2011/0345 refers) located on the northern settlement edge of Penllergaer served off Llewellyn Rd. Most of this land was allocated for residential development in the UDP (HC1 (91) refers) for up to 250 dwellings. The 200 units granted planning permission in March 2015 now represent a commitment not a proposed allocation. The proposed LDP site includes farm buildings to the east - which formed part of the allocation in the UDP but do not form part of the recent permission. Additionally, a settlement boundary review has incorporated a small field parcel to the west (near Gelli Hyll Manse). Together these parcels to the east and west could potentially deliver a further 50 units, bringing the overall total up to the 250 units allocated in the UDP.
<b>Size</b>	7.349 Ha
<b>Existing Land use</b>	Agricultural land and buildings
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



### **Candidate Site Public Consultation: Summary of Representations**

The Candidate Site application was advertised on site in the form of site notices.

5 letters of objection were received which are summarised below:

- Loss of agricultural land
- Inappropriate size and scale
- Inadequate public services e.g. health care
- Inadequate road infrastructure to accommodate increased traffic
- Inadequate drainage/sewerage systems
- Increased pollution
- Adverse impact on wildlife/habitat
- Adverse impact on health and wellbeing
- Local schools at capacity

### **LDP Preferred Strategy Consultation: Summary of Representations**

No comments were received specifically regarding this site.

### **LDP Draft Proposals Map Consultation: Summary of Representations**

1 letter of objection received which is summarised below:

- Too many houses in the Penllergaer area
- No infrastructure to support this exponential growth in population
- Traffic is becoming increasingly problematic
- The local school is already too full
- Medical services may be unable to cope causing a detriment to local health
- Issues with phone line and broadband services

- Penllergaer already overpopulated
- Destruction of farmland and more dependence on importation as a nation

### Response to Representations

- The majority of this site is an existing allocation in the current UDP (adopted 2008) where the principle of development of this scale has already been established and planning permission has recently been granted
- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- Further highways improvements will be required to accommodate the development
- It is low grade agricultural land comprising pasture fields. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land
- DCWW have responded as part of the recent consultation and have confirmed that there is sufficient water supply capacity but that sewerage capacity improvements may be required. Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements. In addition, there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding

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- 100% priority habitat sites have been filtered out of the site selection process. For all other sites an extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey at planning application stage, but do not preclude allocation at this stage. For example, most hedgerows will be protected under the Hedgerow Regulations (1997). A hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings would be taken into account when considering a site's development capacity. When wider issues need to be taken into account Any impact on European protected sites will be fully assessed as part of the Habitat Regulations Assessment (HRA)
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as far as possible as part of any development proposal and form natural defensible boundaries
- Not recreational land but would include new recreational/open space areas so actually would provide health and well being benefits
- Local schools are at capacity and a new school to meet future needs is proposed on nearby development site along with traffic improvements to help alleviate existing congestion and accommodate additional traffic generated. The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- All relevant utility providers have been consulted and no significant utility constraints have been identified

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p>Comments made in respect of adjoining development site</p> <p><u>Means of Access:</u> The site has access from Llewellyn Road.</p> <p><u>Local Highway Conditions:</u> J47 interchange and the approaches suffer from considerable congestion during peak hours.</p> <p><u>Accessibility:</u> There is an hourly frequency past the site.</p> <p><u>Wider Issues / Combined effect:</u> The site is likely to add to current peak time flows and congestion in the area.</p> <p><u>Restrictions:</u> The site is currently under consideration for planning consent under its former UDP allocation. No extension of that currently being considered should be accepted until local congestion issues can be addressed.</p> <p><u>Transport Proposals:</u> Improvements to local traffic flows are necessary.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies that over 4,700 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>The area contains scrub, mature trees and hedgerows. Hedgerows may be classified as important hedgerows protected under the Hedgerow Regulations (1997). Mature trees and Hedgerows have the potential for associated protected fauna. A survey for the presence of protected species needs to be carried out and important features highlighted may require further survey</p>
CCS Environmental Health	<p>No issues</p>
CCS Education	<p><u>Penllergaer Primary:</u> There is no capacity to accommodate increased numbers from these sites. Therefore there is a new school requirement for the area. NB there have been negotiations with one of the site developers at present to extend Penllergaer Primary (PG006), however the increased pupil numbers from all the developments would require a New school</p>



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	<p><u>Pontarddulais Comprehensive</u>: At capacity. An extension of Pontarddulais Comprehensive would probably require a Statutory Notice. We have serious concerns over the ability of the current capacity of Pontarddulais Comprehensive School being able to accommodate the number of secondary pupils being generated from these developments. Significant investment will be required to accommodate the large increase in pupil numbers from all the developments in its catchment</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Foul water drains to Gowerton STW. MOU issues.</p> <p>WFD Moderate-Llan/Lliw.</p> <p>Watercourses and springs appear to be present on site.</p> <p>A Historic Landfill site lies to the north of site at Llys Nini Far.</p>
Dwr Cymru	<p><u>Water Supply</u>:  <u>Initial Comments for Candidate Sites in the Ward</u>: The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site. However, an assessment may be required, in particular for the larger densities, to understand the extent of off-site mains required.</p>

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	<p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	<p>Mining legacy – former surface mining and mine entry at south</p> <p>Where former surface mining has taken place, detailed site capacity and layout work will need to look at the actual extraction boundary and the restoration backfill that took place. Development should avoid the ‘high wall’ that is the boundary of the actual extraction area, as differential settlement is likely to occur within the former extraction area to that outside. Further compaction of the backfill material may be required depending upon the engineering standard it was undertaken to. It is likely to have been engineered suitable for the afteruse planned at the time of restoration.</p>
Penllergaer Community Council	The Community Council accept that this site was included in both the IHLPS and UDP and that an application has already been submitted for outline planning consent. Nonetheless, the Community Council continue to have concerns in respect of the proposed site access and the capacity of the mini roundabout on Gorseinon Road/Llewellyn Road to handle increased traffic movements, especially at peak times.

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**Stage 3A: Assessment Against LDP Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-2	n/a	+2	+1	n/a	n/a	+1	+2	n/a	n/a	-1	-1	-1	-1	n/a	?	+1	+1

**Stage 3B: Assessment Against SEA/SA Objectives**

Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Score	+/-	-	?	++	0	+	+	0	?	+/-	--	+/-	?	-	+/-	x	+/-	?	?	--	?	?