

## CITY AND COUNTY OF SWANSEA

### NOTICE OF MEETING

You are invited to attend a Special Meeting of the

### PLANNING COMMITTEE

**At:** Committee Room 2, Civic Centre, Swansea

**On:** Monday, 6 July 2015

**Time:** 11.00 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 - 132



**Patrick Arran**  
**Head of Legal, Democratic Services & Procurement**  
**Monday, 29 June 2015**

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**Contact: Democratic Services: - 636923**

## PLANNING COMMITTEE (12)

### Labour Councillors: 8

David W Cole	Paul Lloyd <b>(Chair)</b>
Ann M Cook	Paulette B Smith
Erika T Kirchner	Des WW Thomas
Andrea S Lewis	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**

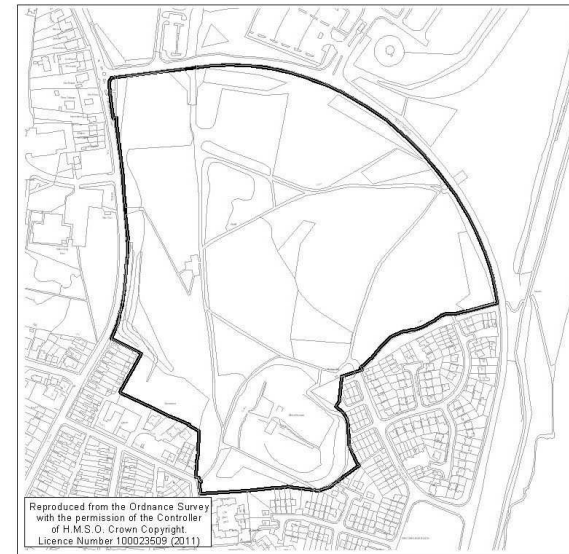
1. If an Officer has a financial interest in any matter which arises for decision at any meeting to which the Officer is reporting or at which the Officer is in attendance involving any member of the Council and /or any third party the Officer shall declare an interest in that matter and take no part 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.

## CONTENTS

ITEM	SITE REF.	SITE LOCATION
1	GO007	Land at Parc Melin Mynach, Gorseinon
2	GO008	Land at Parc Melin Mynach & Heol Eifion, Gorseinon
3	GO001	Land east of Pontarddulais Road
4	PY012	Land at Tyrisha Farm, Grovesend
5	PT002	Land north of Pontarddulais
6	LF001	Walters Yard, off Swansea Road, Pontlliw
7	LF011	The Poplars, Pontlliw
8	MB005	Land off Clasemont Road, Morrison
9	PG002	Land at Parc Mawr Farm, Penllergaer
10	PG004	Land at Penllergaer Civic Offices

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<b>Reference</b>	<b>GO007</b>
<b>Name</b>	<b>Parc Melyn Mynach</b>
<b>Description</b>	The site is situated within the urban area of Gorseinon, to the north of the district centre. The site is enclosed by Pontardulais Road to the west and Heol Mynydd Mynach to the north and east which loops around the site. As such the road provides a physical barrier from the site and the wider countryside and Green Wedge. A large proportion of the site is allocated for housing under the provisions of the extant Unitary Development Plan with the remainder allocated for Greenspace.
<b>Size</b>	16.5Ha
<b>Existing Land use</b>	Part UDP Housing Allocation and part greenspace
<b>Proposed Land Use</b>	Residential development of up to 300 units and greenspace
<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.

20 letters of objection were received which are summarised below:

- SINC
- Loss of recreational space
- Adverse impact on wildlife/loss of habitat
- Increased traffic
- Highway safety
- Site of historical importance
- Devaluation of property
- Adverse impact on drainage
- Already densely populated area
- Lack of local facilities

In addition to this one letter of comment was received which is summarised below:

- Cycle and walkway should have a crossing over the main road to link with the cycle track to Grovesend (the crossing is currently on a dangerous fast blind bend)

**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, summarised below:

- Housing pressure on local infrastructure (particularly roads, but also schools, surgeries and other key facilities)

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- Impact of additional sewage outflows on Burry Inlet SAC
- Presence of UKBAP Priority habitats on site (Wet woodland)

### Response to Representations

- 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
- Any development would include greenspace public open space provision/play areas, particularly to the western and southern sides of the site where past underground workings preclude development
- Development will result in an increase in traffic. Traffic speeds past the site will need to be reduced. Improvements alterations to the traffic signal junction at High Street may be necessary. Local highway improvements may be necessary. No objection relating to highway safety issues
- The site is a landscape of historic interest, with features of industrial heritage. Cadw would be consulted during the planning application stage
- Devaluation of property is subjective and not a material planning consideration
- Sustainable urban drainage scheme (SUDS) will be incorporated into any development scheme. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- 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 and density of development
- Gorseinon is a district centre, with many facilities and services

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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
- 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 21st 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
- 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> Access can be constructed from Heol y Mynydd. It may be necessary to consider a small roundabout access to assist in controlling movements and vehicle speed. This can be combined with access requirements for the site opposite. Access from Pontarddulais Road should be restricted. Query if there could be a secondary access through Ffordd Eira</p> <p><u>Local Highway Conditions:</u> Traffic speeds past the site will need to be reduced. Improvements alterations to the traffic signal junction at High Street may be necessary</p>

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	<p><u>Accessibility:</u> There is an hourly frequency service past the site</p> <p><u>Wider Issues / Combined effect:</u> All sites in this Ward will add to existing traffic congestion along the route from Gorseinon up to Penllergaer and M4 J47. Some traffic is also likely to add to congestion at Victoria Road in Gowerton where the Llanelli Link crosses the route. Significant improvements may be required with contributions to major improvements by each of the Gorseinon sites</p> <p><u>Restrictions:</u> Provided that both local improvements and wider major improvements are achievable, no restrictions will be necessary</p> <p><u>Transport Proposals:</u> Schemes to address congestion on the major arterial routes in the area will be necessary to support any significant development</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>This site contains Lowland meadow, which is a habitat of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006). Priority species recorded on this site; Bullfinch, Brown-banded carder-bee, The cinnabar, Kestrel, Small Heath, Song thrush, are species of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006). Species of contributory concern; Bee Orchid, Goldcrest, Golden-ringed Dragonfly, Green woodpecker, meadow crane's-bill and stone chat</p>



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<p>CCS Environmental Health</p>	<p>Overlays site 48 former Mountain colliery 049 former Gorseinon &amp; Grovesend tinsplate, Grovesend steelworks, Monarch Vitriol works: site investigation condition</p> <p>Opposite Toyoda: noise conflict? Subsequent comments from Environmental Health re GO001 which is 135m from Toyoda boundary 17/04/2014: Toyoda Gosei is currently regulated under the Environmental Permitting (England &amp; Wales) Regulations 2010 (as amended) and has a Part B Permit. The Part B permit is concerned with the release to air only from the site due to the use of solvent in the coating activity carried out at the site. There is the potential for growth at the site and they are projecting an increase in solvent usage as the business grows and so there is the possibility that the Part B Permit will have to be surrendered and an A2 permit applied for instead. An A2 permit covers release to land, water and air from the activity and so is a marked step up in regulatory requirements. The potential nuisance from the site could relate to noise from access to the facility due to deliveries, shift patterns, noise from operations at the facility, potential odour issues from activities etc... With experience surrounding this type of industry, residential development within the distances stated previously would likely result in nuisance and should be avoided</p>
<p>CCS Education</p>	<p><u>Gorseinon Primary</u>: School rebuild is proposed at its current capacity. The increase in pupil numbers for this area would require this 'new' build to be extended</p> <p><u>Penyrheol Comprehensive</u>: Has recently been rebuilt; however, the cumulative impact of all developments in the catchment area of Penyrheol Comp would need further careful consideration in order to determine increased secondary provision, including a rebuild of the Annex that was not part of the original rebuild.</p>
<p><b>External Stakeholder</b></p>	<p><b>Comments</b></p>
<p>Natural Resources Wales</p>	<p>Consider MOU. Only partially falls within sewered area. 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. The site is mainly composed of grassland, woodland and scrub, with some areas of hardstanding. Possible BAP habitat. Records for a number of BAP species, nearby. Potential contamination from nearby tinsplate works (Maerdy). Potential for solvent contamination/impacts on water quality. Former area of quarrying</p>

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Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Although there are currently no problems with the water supply network, the promotion of these developments will result in the area having mains water pressure problems. It is therefore inevitable that network improvements and potentially a new water pumping station will be required</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. A 225mm diameter sewer traverses the centre of the 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 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. Query with DCWW.</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>Across the County there is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth</p>

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Coal Authority – areas currently reserved for greenspace protection coincide with main Coal Referral Areas.	Mining legacy – Approximately 5 mine entries at south and west
Gorseinon Town Council	Strong public opposition to wholesale development for housing. The site should be retained for open greenspace/nature reserve and parkland for the adjoining community to enjoy. There are rare plant species and Nature conservation designations within the overall site and much of the site is currently allocated as nature reserve in the current UDP.

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

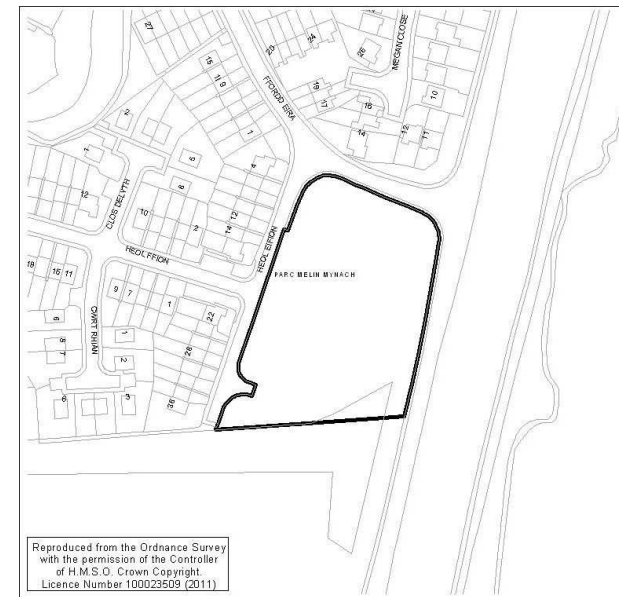
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	+2	+1	+2	+1	?	-1	n/a	+1	+1	+1	n/a	+1	+2	0	n/a	-1	+1	-1	+1	n/a	?	+2	+1

**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>GO008</b>
<b>Name</b>	<b>Land at Parc Melyn Mynach and Heol Eifion, Gorseion</b>
<b>Description</b>	This level, featureless site is situated within the urban area of Gorseion, surrounded by residential development to the north and the district centre to the south. It is currently allocated for housing under the provisions of the extant Unitary Development Plan HC1 (101).
<b>Size</b>	0.8Ha
<b>Existing Land use</b>	Undeveloped UDP Housing Allocation for 52 units
<b>Proposed Land Use</b>	Residential development - 25 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

35 letters of objection were received which are summarised below:

- SINC
- Loss of recreational space
- Increase in traffic/inadequate road infrastructure
- Loss of open space
- Possible adverse impact on anti-social behaviour
- Adverse impact on semi-rural area
- Could be used as a much needed play area for children
- Devaluation of property
- Lack of local services e.g. schools and doctors surgeries
- Adverse visual impact
- Adverse impact on wildlife and plant life
- Highway safety
- Adverse environmental impacts
- Area of historical importance
- Adverse effect on quality of life
- Already over developed area

In addition to this one letter of comment was received which is summarised below:

- Land should only be used for private housing and not social housing
- Area of historical interest should be kept as a nature reserve
- There should not be any apartments built on this land as it would spoil the look of 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

No comments were received specifically regarding this site

## Response to Representations

- Site is not classified as a SINC. Detailed ecological studies required but would not prohibit development
- The site does not form part of the formal public open space system
- 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
- 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>
- Site is currently allocated for development within the Unitary Development Plan and is located within the current settlement boundary
- Any development would include play provision/open space if there is a local deficiency
- Devaluation of property is subjective and not a material planning consideration
- Gorseinon is a district centre, with many facilities and services in close proximity to the site
- 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 impacts
- Detailed ecological studies required but would not prohibit development
- 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.

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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.
- 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> Access needs to be restricted to Heol Eifion only</p> <p><u>Local Highway Conditions:</u> Traffic speeds past the site will need to be reduced. Improvements alterations to the traffic signal junction at High Street may be necessary</p> <p><u>Accessibility:</u> There is an hourly frequency service past the site</p> <p><u>Wider Issues / Combined effect:</u> All sites in this Ward will add to existing traffic congestion along the route from Gorseinon up to Penllergaer and M4 J47. Some traffic is also likely to add to congestion at Victoria Road in Gowerton where the Llanelli Link crosses the route. Significant improvements may be required with contributions to major improvements by each of the Gorseinon sites</p>

**PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015**

	<p><u>Restrictions:</u> Provided that both local improvements and wider major improvements are achievable, no restrictions will be necessary</p> <p><u>Transport Proposals:</u> Schemes to address congestion on the major arterial routes in the area will be necessary to support any significant development</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>This site contains semi-improved grassland and scrub, which may be able to be classified under the SINC guidance. 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>overlays site 48 former Mountain colliery, 049 former Gorseinon &amp; Grovesend tinplate, Grovesend steelworks, Monarch Vitriol works: site investigation condition</p>
CCS Education	<p><u>Gorseinon Primary:</u> School rebuild is proposed at its current capacity. The increase in pupil numbers for this area would require this 'new' build to be extended</p> <p><u>Penyrheol Comprehensive:</u> School has recently been rebuilt; however, the cumulative impact of all developments in the catchment area of Penyrheol Comp would need further careful consideration in order to determine increased secondary provision, including a rebuild of the Annex that was not part of the original rebuild.</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. Possible BAP habitat grassland with trees and scrub towards the south of the site. Mature hedgerow along southern boundary of site, which should be maintained. WFD moderate. Zone B Flood risk.</p>



**PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015**

Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Although there are currently no problems with the water supply network, the promotion of these developments will result in the area having mains water pressure problems. It is therefore inevitable that network improvements and potentially a new water pumping station will be required</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</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>Subsequent Site Specific Comments on the Draft Proposals Map: 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	Across the County 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
Gorseinon Town Council	Residential development of the site is opposed - site should remain open greenspace

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Stage 3A: Assessment Against LDP Objectives

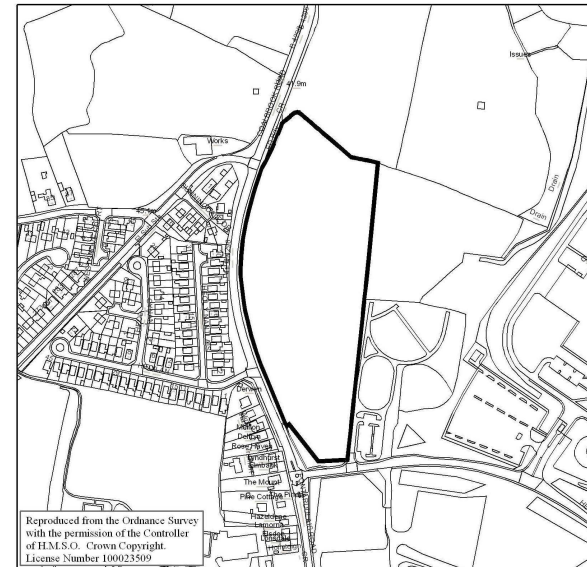
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	+1	n/a	+2	0	n/a	-1	n/a	+2	+1	n/a	n/a	n/a	+1	n/a	n/a	-1	-1	-1	-2	n/a	?	+2	+1

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>GO001</b>
<b>Name</b>	<b>Land east of Pontarddulais Road, Gorseinon</b>
<b>Description</b>	The site is open agricultural land situated outside the defined settlement boundary. It is sandwiched between Pontarddulais Road and an allocated cemetery site in the vicinity of the Toyoda Gosei works further east. This side of Pontarddulais Road is primarily rural in character, however there is residential development for the length of the proposed site on the opposite side of the road
<b>Size</b>	4.2 Ha
<b>Existing Land use</b>	Agricultural 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

43 letters of objection were received which are summarised below:

- Inadequate road infrastructure and site access
- Inadequate sewerage system
- Greenfield
- Lack of local facilities e.g. medical services, shops, post office
- Common Land
- Local schools already at capacity
- Loss of agricultural land
- Inadequate drainage/flood risk
- Loss of recreational space
- Coalescence of villages
- Contrary to current policy
- Encroachment into open countryside
- Adverse impact on wildlife/loss of habitat
- Highway safety
- Loss of open space
- Adverse impact on character and amenity
- Adverse impact on air pollution
- Urbanisation of rural area
- Inadequate water system
- Adverse visual impact
- Ribbon development
- Possible adverse impact on crime and anti-social behaviour

In addition to this one letter of support was received which is summarised below:

- It would provide much needed housing in the area

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

1 letter from site promoter:

- Support for inclusion of CS GO001 in Deposit LDP for 90 to 120 dwellings with open space. Supporting documents demonstrate how site can be delivered and confirms no constraints to development. Also address issues of Utilities, Flooding, Ecology & Landscape. Site immediately available. Sustainable location with access to range of facilities and public transport. Small settlement extension in line with Preferred Strategy and Wales Spatial Plan which meets identified need. Further studies undertaken suggest that the land is suitable for development

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

1 letter of support from site promoter:

- Indicating significant amount of work already undertaken and submitted as part of previous consultation. Confirmation of developer's commitment to site and delivery within early stages of the LDP. Consider site a highly appropriate and sustainable allocation. Propose it could contribute 120 dwellings over a 3 to 4 year period in the early stages of the LDP

### **Response to Representations**

- No highway objections provided that both local improvements and wider major improvements are achievable. Site access is achievable from Pontarddulais Rd. Speed restrictions may be required past the site
- The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period. In order to accommodate this level of growth, settlement boundaries will be reviewed and some development will be necessary on Greenfield sites
- Gorseinon is a district centre, with many facilities and services in close proximity
- The site is not Common Land
- 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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- The site is Grade 4 agricultural land and there is no indication that the sites loss would undermine the viability of the farm holding
- No issues relating to flood risk identified
- Site is not public open space and does not form part of the accessible natural greenspace system
- The development would not lead to coalescence of settlements. Development limit would be the same as that to the east of Coalbrook Rd
- Upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016
- All settlement boundaries are being reviewed as part of the preparation of the development plan.
- An extended phase1 habitat survey and hedgerow assessment is required, but no constraints identified which would prohibit development
- Insufficient information to be able to comment design, size and scale of any future development. 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
- No indication of significant pollution (including air) issues. The planning application process would not permit development that would result in harmful levels of pollution
- Site has development to the west, a cemetery to the east and a factory further east. It's appearance is not therefore, what would be considered typically 'rural'
- DCWW have responded as part of the recent consultation and have confirmed that there is sufficient water supply capacity or capacity can be upgraded 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.
- The proposal would not result in ribbon development, but as a logical rounding off of the settlement
- South Wales Police will be fully consulted during the LDP preparation process - crime prevention measures will be considered as part of the design process <http://www.swansea.gov.uk/spg>. 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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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access can be constructed from Pontarddulais Road. It may be necessary to consider a mini roundabout access to assist in controlling movements and vehicle speed</p> <p><u>Local Highway Conditions:</u> Traffic speeds past the site will need to be reduced</p> <p><u>Accessibility:</u> There is an hourly frequency service past the south of the site and a 30 min frequency service at the northern end. There are no bus services past the main body of the site itself</p> <p><u>Wider Issues / Combined effect:</u> All sites in this Ward will add to existing traffic congestion along the route from Gorseinon up to Penllergaer and M4 J47. Some traffic is also likely to add to congestion at Victoria Road in Gowerton where the Llanelli Link crosses the route. Significant improvements may be required with contributions to major improvements by each of the Gorseinon sites</p> <p><u>Restrictions:</u> Provided that both local improvements and wider major improvements are achievable, no restrictions will be necessary</p> <p><u>Transport Proposals:</u> Schemes to address congestion on the major arterial routes in the area will be necessary to support any significant development</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 over 4,700 homes are needed within this strategic housing policy zone over the LDP period</p>
CCS Biodiversity	<p>This site may contain; semi-natural grassland and hedgerows protected under the Hedgerow Regulations (1997).</p> <p><u>Priority species recorded on the site are;</u> <i>Shaded broad-bar, House Sparrow and Cinnabar</i>, These are species of principal importance for the conservation of biological diversity in Wales under the Natural Environment and Rural Communities Act (2006).</p> <p><u>Species of contributory concern</u> recorded on this site; Barn Owl and Red Kite.</p> <p><u>An extended phase 1 habitat survey and hedgerow assessment</u> 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>Ref old mine workings?</p> <p><u>Initial Comments:</u> @135 metres to TOYODA boundary: [permitted installation] – potential nuisance &amp; conflict</p> <p><u>Subsequent Comments (17/04/2014):</u> Toyoda Gosei is currently regulated under the Environmental Permitting (England &amp; Wales) Regulations 2010 (as amended) and has a Part B Permit. The Part B permit is concerned with the release to air only from the site due to the use of solvent in the coating activity carried out at the site. There is the potential for growth at the site and they are projecting an increase in solvent usage as the business grows and so there is the possibility that the Part B Permit will have to be surrendered and an A2 permit applied for instead. An A2 permit covers release to</p>



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	land, water and air from the activity and so is a marked step up in regulatory requirements. The potential nuisance from the site could relate to noise from access to the facility due to deliveries, shift patterns, noise from operations at the facility, potential odour issues from activities etc... With experience surrounding this type of industry, residential development within the distances stated previously would likely result in nuisance
CCS Education	<p><u>Gorseinon Primary</u>: School rebuild is proposed at its current capacity. The increase in pupil numbers for this area would require this 'new' build to be extended</p> <p><u>Penyrheol Comprehensive</u>: Has recently been rebuilt; however, the cumulative impact of all developments in the catchment area of Penyrheol Comp would need further careful consideration in order to determine increased secondary provision, including a rebuild of the Annex that was not part of the original rebuild.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	Consider MOU. Outside sewered area but closest connection is Llannant. Given number of proposed houses, strongly recommend consultation with DCWW to ensure no capacity issues. Possibly need to undertake compensatory surface water removal? Mature hedgerow at the north of the site. Should be retained with suitable buffer. WFD moderate. Potential contamination from nearby factory (<150m from site). Former coal stocking yard. Therefore, potential mine shafts?
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: Although there are currently no problems with the water supply network, the promotion of these developments will result in the area having mains water pressure problems. It is therefore inevitable that network improvements and potentially a new water pumping station will be required</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</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</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	Across the County 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 - PRUG – Unrecorded probable historic underground workings at shallow depth and approximately 7 mine entries at south, west and north</p> <p>Coal referral area present. Site submitter technical report concludes this is not an obstacle to development</p>
Gorseinon Town Council	The site lies within open countryside as currently protected by the green wedge EV23 allocation in the UDP, and should remain undeveloped open countryside. Also ground condition problems within site, and its development would lead to pressure for coalescing of Penyrheol and Grovesend settlements. Public representations also felt the local highway network and schools would be unable to cope with the scale of new housing being proposed within the local area.

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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	n/a	+1	n/a	n/a	-2	-1	-1	-1	n/a	?	+1	0

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>PY012</b>
<b>Name</b>	<b>Land at Tyrisha Farm, Grovesend</b>
<b>Description</b>	The original submission was for a larger area of agricultural land and farm buildings extending further east. This was subsequently amended to reduce the area to include only the western part of the site which lies between the rear residential curtilages of Tyrisha Road and the farm access. The site adjoins the playing fields of Pengelli Primary School and the submission suggests part of the remaining area of the original submission as a possible extension to the playing fields. The eastern part of the site adjoins a large of common land which surrounds the eastern and northern boundaries of Grovesend. The site is accessed via a rural lane which is a continuation of Plas Road and forms the southern boundary of the site. The lane provides access to both the farm development to the south (adj PY011), and the wider common land area. PY011 is a further site for consideration should additional land for housing be required.
<b>Size</b>	3.8 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)

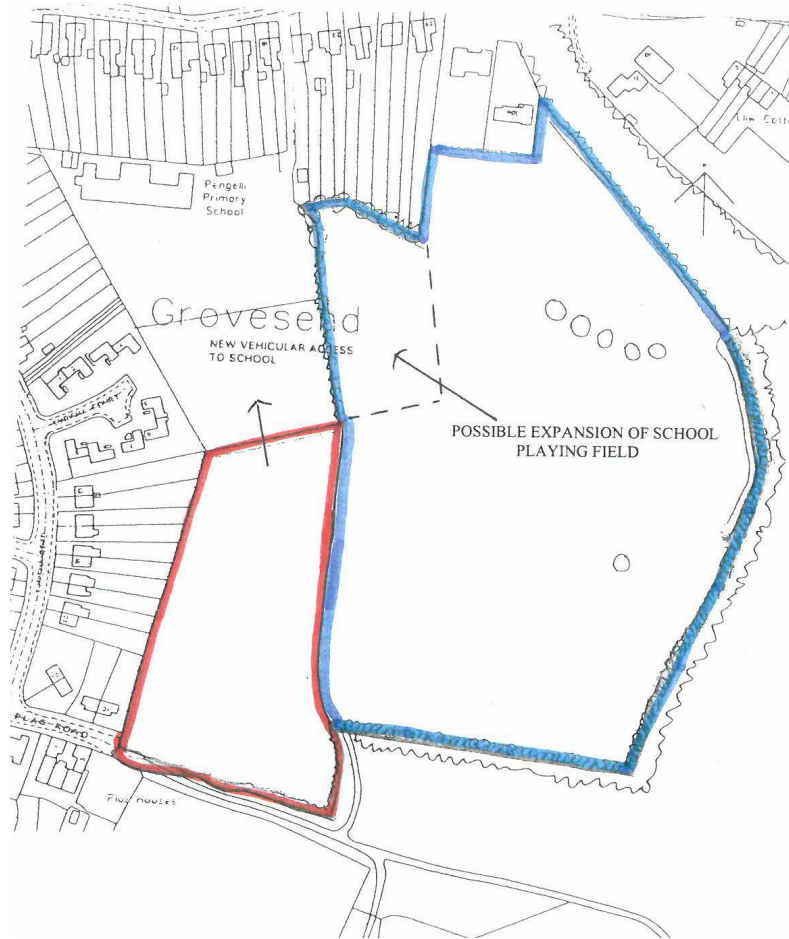


**Revised Site Boundary**

Letter of 21<sup>st</sup> October 2011 - CDN Planning

Request to “amend site boundary to reduce the proposed area to relate only to that part of the site which is immediately adjoining the village and which in part is already occupied by the farm house and part of the yard”.

A revised plan and schematic layout was submitted which is set out below.



Schematic housing layout



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

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

47 letters of objection were received which are summarised below:

- Previously rejected planning permission, reasons still valid
- Access to development is a concern
- Concern regarding sewerage system
- Lack of local facilities e.g. GP surgeries
- Increased traffic, roads unable to cope
- Green field site
- Common land
- Local school unable to cope
- Encroachment into open countryside
- Flood risk
- Highway safety
- Adverse impact on character and amenity
- Contrary to current policy
- Coalescence of settlement
- Adverse impact on wildlife/habitat
- Adverse impact on Loughor Estuary
- No mains sewerage
- On approach path of Swansea Airport
- Inappropriate size and scale
- Loss of agricultural land

1 letter of support was received from site promoter which is summarised below:

- Demand for affordable housing
- Substantial benefit to local school which is suffering due to lack of pupils
- Do not exceed or infringe into the village of Gorseinon, solely around Grovesend

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- Would encourage more amenities and facilities
- Excellent transport links

1 letter of comment was received which is summarised below:

- Gorseinon Town Council - outside town 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.
- Impacts on water/sewage and transport infrastructure must be addressed through improvements incorporated into the 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 DCWW have advised that a water supply can be made available to the site. Further that there are no problems envisaged with the public sewerage system for domestic foul flows in this area. No impacts have been identified in relation to Loughor Estuary.
- 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.

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- Acknowledge that there are limited local facilities within the village. However, there is a primary school and a half hourly bus service to provide connections to higher level services and facilities. Development may also have a positive impact by increasing local populations and increasing the viability of providing local community services and facilities. 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 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 before encroachment of development into rural areas around the urban fringe is considered.
- The site itself is not registered common land although land adjacent is. Common land is not an insurmountable constraint to development. Where common land is proposed for development a suitable exchange of land must be found and the appropriate statutory process followed to deregister the land.
- 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.
- Development would extend the settlement to the east. However the site is well surrounded by open common land for a considerable distance to the east. The development would not therefore result in coalescence and the development would still retain a sense of the proximity of open countryside to the east.
- With regard to flood risk, the Council have consulted with NRW and a Strategic Flood Consequence Assessment has been carried out. This has concluded that the site is not within a flood zone, or a TAN15 DAM zone. With regards to surface water flood risk, the chance of flooding is greater than 1 in 30. There are no significant historical records of flooding events. 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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- 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 Strategic Housing Market Assessment has identified the Greater North West Housing zone as an area where there is a need for around 4,600 homes over the LDP period. The provision of housing land in Penyrheol will require a balance between conserving and enhancing the character of the village and its setting and ensuring that there is sufficient good quality housing to meet the needs of residents and ensure the future sustainability of the settlement.
- 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
- Swansea Airport has not raised any issues regarding this 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. However, in the case of candidate site PY012 the land is classified as Grade 4 agricultural land.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site could be accessed from Plas Road but improvements will be necessary.</p> <p><u>Local Highway Conditions:</u> The site access roads emerge onto Pentre Road which is a local distributor carrying traffic between Pontardulais and Gorseinon.</p> <p><u>Accessibility:</u> There is a 30 min frequency within 210m of the site.</p> <p><u>Wider Issues / Combined effect:</u> All sites in this Ward will add to existing traffic congestion along the route from Gorseinon up to Penllergaer and M4 J47. Some traffic is also likely to add to congestion at Victoria Road in Gowerton where the Llanelli Link crosses the route. Significant improvements may be required with contributions to major improvements by each of the Penyrheol sites.</p> <p><u>Restrictions:</u> Significant traffic generation cannot be accommodated without improvements being undertaken. There is a need to improve Plas Road leading to the site.</p> <p><u>Transport Proposals:</u> Schemes to address congestion on the major arterial routes in the area will be necessary to support any significant development.</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>May contain; Purple Moor-grass and Rush pasture.</p> <p>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.</p>

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CCS Environmental Health	No issues identified
CCS Education	<p><u>Pengelli Primary</u>: Would be able to accommodate all of the potential pupils. There are concerns over suitability and access to the primary school site is restricted</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>Consider MOU. Within the sewer catchment, but site drains to Llannant STW. MOU issues.</p> <p>If any buildings are to be demolished / altered, then they should first be assessed/surveyed for their suitability for bats.</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> <p><u>Waste</u>:  <u>Initial Comments for Candidate Sites in the Ward</u>: No comment at this stage.</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>Drains to Llannant STW – Limited capacity.</p>

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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 3 mine entries at south and east.
Grovesend Community Council	The candidate site applicant has informed the Community Council at the recent public meeting that the application as submitted is incorrect. The actual proposal is less than half the size of the original application. Nevertheless, there remains concern that the development is too large and detrimental to the village and quality of life of residents. Two previous applications have been rejected and the reasons for rejection should remain. The development would cause severe traffic problems through a current narrow lane. The site is green belt and used for agricultural/farming use. Storm drains to unable cope.

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

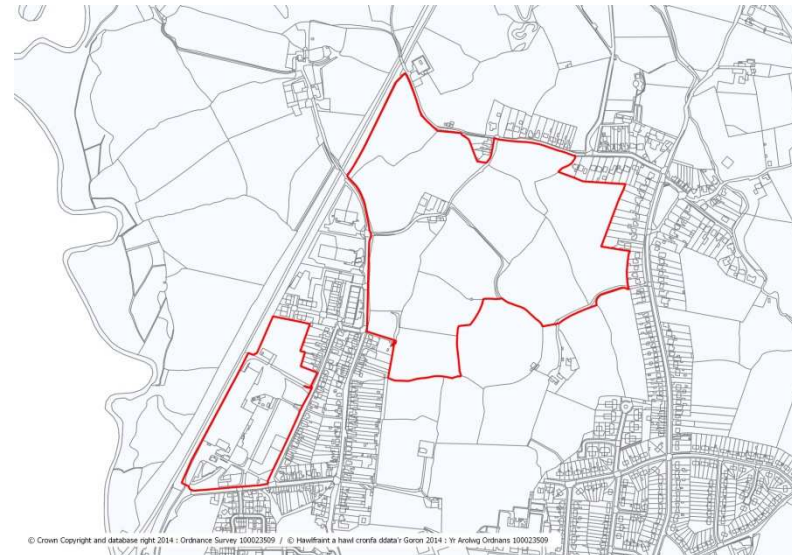
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-1	?	+1	0	n/a	n/a	n/a	+1	n/a	n/a	-1	+1	-1	-1	n/a	?	+1	+1

**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	0	?	+/-	-	+/-	?	+/-	+	x	?	+/-	?	-	+/-	+/-

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<b>Reference</b>	<b>PT002 (Incorporating PT007, PT008 and PT011)</b>
<b>Name</b>	<b>Pontarddulais North Strategic Site</b>
<b>Description</b>	A large Strategic Site encompassing the TATA Steel Site, Tynybonau Industrial Site and greenfield land between Tynybonau Road and Glynhir Road to the north of Pontarddulais. The proposal includes a new link road to the Lye Industrial Estate; a retained and improved employment area, residential development of varied densities and diversity of house type on the TATA Steel site (approx. 250 units) and the land off Tynybonau Road (approx. 500 units); as well as public open spaces and green corridor links. The town cricket ground and Pontarddulais Comprehensive School are located further south adjoining which where there is additional land with potential to be set aside for educational needs purposes. The site is well enclosed by existing development and rounds off the settlement.
<b>Size</b>	26.2Ha
<b>Existing Land use</b>	Industrial and Greenfield 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.

1 x 1172 signature petition of objection was received which is summarised below:

- Objection to any house building on greenfield land in and surrounding Pontarddulais
- Pontarddulais has been overwhelmed by new housing giving rise to serious environmental, medical, educational and unemployment problems
- Will need to grow and produce more food in this country as the world food shortage worsens
- Protect agricultural land for future generations

11 letters of objection were received which are summarised below:

- Infrastructure and existing facilities not sufficient to accommodate further development
- Lack of capacity in local schools
- Flood risk/part if site lies within flood plain
- Large increase in residential land use has resulted in a large scale loss of employment
- (PT007 objection) Adverse impact on character and amenity
- (PT007 objection) Loss of natural drainage
- (PT007 objection) Old mine workings in the area
- (PT007 objection) Inadequate infrastructure to accommodate further development
- (PT007 objection) Increased traffic
- (PT007 & PT008 objection) Greenbelt
- (PT008) Adequate affordable houses on the property market
- (PT008 & PT011) Loss of agricultural land
- (PT011) Area is overdeveloped
- (PT011) Lack of public amenities and services
- (PT011) Infrastructure is over capacity
- (PT011) Overlooking/loss of privacy
- (PT011) Inappropriate narrow road unsuitable for further development
- (PT011) Destruction of hedgerows

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- (PT011) Adverse impact on wildlife/habitat
- (PT011) Gas terminal on site
- (PT011) Vital pipeline services crossing site

2 letters of support were received which are summarised below:

- Should be developed to benefit of the community
- Added benefits should be, linking Tynybonau with Glyn Hir Road, or/and McMillan's

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

2 letters of objection were received which are summarised below:

- Object to the further development of Pontarddulais given that there are still unimplemented planning consents and to the fact that the further development of the town could have an adverse effect on the Welsh Language
- Consider that any proposed large scale housing development in the area should have regard to the existing infrastructure which would require upgrading and enhancing whilst any future housing development needs to have a mix of housing types to include bungalows and affordable housing.

2 letters of support were received

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

2 letters of objection were received which highlighted the following in addition to the above:

- Decrease in the valuation of existing homes

**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.
- 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 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
- 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 site is grade 3 agricultural land and therefore considered not the best and most versatile of agricultural land
- 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
- 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. Only part of the area is at risk of flooding and these locations can be avoided



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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
- 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
- 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
- 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
- The Strategic Housing Market Assessment identifies that around 4,600 homes are needed within the Greater North West Housing Policy Zone over the LDP period. Approximately 20% of which will need to be for affordable housing
- 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

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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
- The site proposer is in dialogue with statutory consultees to ensure that where there are constraints such as hazardous installations/pipelines that the development proposal is in accordance with their requirements. A strategic water main crosses the site. Development on this and within its buffer will be avoided to the satisfaction of DCWW
- Development of the site would not lead to a loss in employment provision. In fact the proposal will improve accessibility to Lye Industrial Estate to the north and lead to environmental enhancements to Glan Llwyd Workshops. The former Corus Steelworks is now used for storage purposes and has only security staff in employment. This new development may attract further investment in the area that may lead to job creation
- Impacts on the Welsh Language will be mitigated via a specific policy that will be established within the Deposit Plan
- The devaluation of property/loss of view is not a material planning consideration. There are no rights of open access or views over the countryside adjoining existing settlements

### Special Planning Committee 08/06/15

#### **Petitioner Dr Susan Barnes**

*Pontarddulais is a semi-rural community which has borne the burden of significant development over the last decade. According to the ONS, the population of Pontarddulais has grown by 23% since the 2001 census and this has largely been as a result of new housing development. Pontarddulais schools (and indeed their neighbouring ones) are virtually full and Pontarddulais primary is now one of the largest primary schools in Swansea. At Ysgol Gyfun Bryniago class sizes are well above the national average and given the proximity of the schools, traffic congestion during school start and end times is notorious. The GP surgery is already struggling to cope with the demands of the population growth since 2001- as anyone who has had to participate in the 8am battle for a same day appointment will testify - recruitment of suitably qualified staff, as well as the limitation of physical facilities being an issue. At rush hours the one way system in the centre of Pontarddulais is gridlocked – and the two main exit points onto the*

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*motorway at Penllergaer and Hendy are backed up causing traffic queuing and long delays. The existing sewerage system is overloaded and does not meet existing demand.*

*Taken all the above into consideration, one might think that proposals to build somewhere between 700 and 1000 houses in Pontarddulais might not make much sense – particularly as over 70% are planned to be on greenfield sites. But apparently in the world of Local Development Plans and the boardrooms of profit motivated developers, it makes perfect sense. And thus we find ourselves midst a public consultation about a proposal to increase the size of Pontarddulais by approximately a third – a proposal which if approved will massively impact not just on the size of the community and its already creaking infrastructure, but also the very character of a tight knit and close community.*

*Consultation with the community thus far has been desultory. Time will tell if it has followed the minimum legal requirement – but even if it is proved to be legally compliant, as residents and council tax payers we expect more. The LDP process and the expertise and knowledge required to engage with the process is heavily biased towards professionals and developers. A public consultation which hides behind jargon, provides scant information in an accessible format and which requires ordinary citizens to go above and beyond what can be reasonably expected of them is no consultation at all. As a resident of Glanffrwd Rd – some 15 feet from the north end of the 500 unit housing estate on greenfield sites that Persimmon would like to impose on us – I can confirm that there has been scant communication with residents. A small number of residents had heard about the early LDP consultations a number of years ago and registered for email updates. The majority of residents, including those who have moved in over the last year or two, only found out about the proposals as a result of a chance encounter with a member of the Town council – only to be informed that the public consultation held, incidentally, over the “good time to bury bad news” December period was closed. Eventually someone managed to track down a photocopied and dog eared leaflet produced by Persimmon entitled “North Pontarddulais Vision” – which can only be described as a spin doctor’s valiant attempt to sell the advantages of turning Pontarddulais into a concrete jungle. It artfully told us that 30% of the development would be on brownfield site – somehow neglecting to mention that this meant that 70% of the development proposed would be on our green fields. As someone who was naturally rather alarmed and surprised that such massive development proposal– including a 500 unit housing estate in the middle of Pontarddulais –could have reached the end of a consultation without having even heard about it, I undertook to try and find out more about it on the Council website. Not having had much luck, I then tried to find out who to ring at the Council, but hit a brick wall. But I did find an email address to an anonymous shared email inbox. Undeterred I proceeded to write an email airing my concerns and asking a number of detailed questions about the process. My email, perhaps not surprisingly, went unacknowledged, though some seven weeks later I found myself the recipient of a round robin email thanking “those who had responded to the consultation” – which was clearly not me as the process had passed me by - and providing some bland “planning speak” information about the next stages.*

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*Which all goes to leave myself, my neighbours and fellow Pontarddulais residents bewildered and asking how, in the era of multi-media communication, where there are serious concerns about getting people to engage with the democratic process, can proposals which have the potential to massively impact our community slip under radar almost unnoticed via a complex and opaque technical planning process?. It appears that open, accessible and even handed debate is not a priority – meaning that the scales are massively tipped in favour of planning professionals and developers.*

*The scale of the proposed development in Pontarddulais represents a significant threat to a semi-rural, predominantly Welsh speaking community which has absorbed its fair share of housing developments over the last decade. The greed of developers who will, if unopposed, gobble up swathes of greenfield sites and maximise their return on investment by erecting as many houses as they can get away with, shouldn't be a surprise. However we expect better from our elected representatives – and the officers who serve them. This council professes to support communities and one of the mainstays of the council's own plans to cope with its £80 million spending shortfall, is to look to communities to take up the slack. You call it Sustainable Communities. Foisting in excess of 700 homes on us, massively expanding our resident base by a third, building over nearly all the green spaces within the Pontarddulais boundary and burdening our infrastructure beyond breaking point is not about sustaining communities, it is about destroying them. The residents of Pontarddulais deserve and expect better. Please do not let us down and vote to reject this proposal.*

### **Developer Representations at Special Planning Committee 08/06/15:**

**Mr Pete Sulley, Barton Willmore**

#### ***Introduction***

*Thank you Chair and thank you Members,*

*My name is Pete Sulley, Planning Associate at Barton Willmore, planning consultants for Persimmon Homes West Wales who are promoting North Pontarddulais in the Swansea LDP.*

*You will hopefully have received the technical summaries that Persimmon Homes has prepared recently to help Officers and Members to continue to support the allocation of North Pontarddulais in the LDP.*

*Members will be aware that the Preferred Strategy identifies the need to deliver 17,000 new homes and 14,000 new jobs over the Plan period therefore I will not repeat those requirements here in detail.*

Members will also be aware of paragraph 6.32 of the Preferred Strategy which states that:

***“In Pontarddulais there is an opportunity to capitalise on Brownfield opportunities on sites to the north west of the town centre, which in tandem with adjoining Greenfield areas, could provide new education provision and improved access around the town and to the north.”***

### **Pontarddulais**

As Members will know, Pontarddulais benefits from a number of services and facilities including two primary schools, a comprehensive school, a railway station, regular bus services, employment opportunities and a diverse range of shops and high street facilities. Pontarddulais is therefore a sustainable location for the proposed allocation, in accordance with national planning policy.

### **Technical Studies**

Persimmon’s consultant team has undertaken a number of technical studies to demonstrate in more detail that all technical matters can be addressed adequately, and these are contained in your summary pack. The reports conclude that there are no known technical constraints that would prevent the allocation of the site in the LDP, subject to appropriate mitigation being implemented at the appropriate time.

### **Concept Masterplan**

The technical documents have informed a Concept Masterplan, which is in the Planning Summary in your summary pack. This is an illustrative plan at present and can be revised after today’s discussion if necessary.

The development will comprise a mix of starter and family homes, as well as affordable housing. There is also a significant amount of Public Open Space.

The site will have pedestrian and cycle linkages throughout, linking the site with the local schools, railway station, bus stops and town centre.

**The Proposed Link Road**

*A major benefit of the proposed development is the new link road from Lye Industrial Estate through the site to Water Street, which will redirect HGV traffic away from Glynhir Road. This is in line with the Council's Economic Development Team's "Hyder Transport and Development Study for Pontarddulais" which recommends the aforementioned link road, and which identifies the benefits the link road will bring, including improving access to existing employment areas, junction improvements and improving the physical environment in the town, particularly for pedestrians and cyclists. Development of the allocation site will therefore secure this much needed new infrastructure to the benefit of the whole of Pontarddulais.*

**Welsh Language**

*Pontarddulais Ward has the second highest percentage of Welsh speakers in the whole of Swansea (31%) therefore it is a very important element to consider.*

*The allocation will comprise a mix of starter and family homes, similar in size to many of the existing homes in Pontarddulais. This will give local residents a wider choice of homes in the area, thereby reducing the prospects of existing local residents having to leave Pontarddulais to find suitable accommodation. Affordable Housing for local people will also be provided to further help existing residents to remain in the town.*

*In addition, the development itself will help sustain local shops, services and community groups, thereby fostering the Welsh language in Pontarddulais by supporting local amenities.*

**Education**

*Persimmon Homes is also in discussion with the Council's Education Department regarding education provision emanating from the proposed development, which could entail land for a new school north of Pontarddulais Comprehensive School. The homes will also generate children who will attend local schools, further supporting the schools and adding to the number of young Welsh speakers in the town.*

**Conclusion**

*Persimmon Homes West Wales therefore respectfully requests Members to continue to support the proposed allocation of Land north of Pontarddulais in the Swansea LDP.*

*Stuart Phillips, Head of Land at Persimmon Homes West Wales, will now provide Members with some further detail about Persimmon and its work to date:*

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### **Stuart Phillips Persimmon Homes**

*Persimmon Homes has actively engaged with Council Officers and key stakeholders since the inception of the LDP process to ensure that a deliverable and viable scheme can be developed at Pontarddulais that provides the required growth, whilst also providing any key improvements and benefits to the town as just detailed by Pete.*

*In terms of our local commitment and track record of delivering houses, Persimmon Homes West Wales has completed, or is currently on site on, nearly 500 homes across the City and County of Swansea over the last three years. This development has also seen delivery of new infrastructure associated with our developments and the provision of much needed family and affordable homes across the region.*

*Persimmon Homes West Wales is a significant local employer – both directly and indirectly via sub-contractors and the housing construction supply chain. We have signalled a major commitment to delivery of growth in Swansea via our newly established West Wales Regional Head Office in Penllergaer and are committed to working with local communities given our presence in the area.*

*Going forward, we will continue to engage with Members, the public and key stakeholders to ensure that the development proposals for Pontarddulais are delivered in a positive and beneficial manner to bring about investment and infrastructure improvements locally that have been identified as part of the LDP proposals to date.*

### **Key Stakeholder Consultations**

<b>Internal Stakeholder</b>	<b>Comments</b>
CCS Transportation	<p><u>Means of Access</u>: The submission includes for a new link road to serve the site</p> <p><u>Local Highway Conditions</u>: Local congestion and wider congestion issues have been identified in the accompanying Transport and development study</p> <p><u>Accessibility</u>: There is a 10 min frequency service 1Km to the south of the site and a 30 min frequency service 300m to the east, all from the centre of the site</p> <p><u>Wider Issues / Combined effect</u>: The impact of this and other developments on identified local and wider congestion issues will need to be considered</p> <p><u>Restrictions</u>: A full transport assessment covering detailed junction analysis will be required to assess impact and guide the amount of development acceptable</p>

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	<p><u>Transport Proposals</u>: The Pontarddulais transport and development study has identified mitigation necessary to accommodate development in this and the wider area. This site will need to include/fund those infrastructure improvements, some of which are indicated on the master plan for 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. 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 North Pontarddulais site appears of relatively low ecological value although there are features of interest which include hedges and mature trees. If it were to be developed an ecological survey would be needed. No major issues anticipated other than bats if any of the buildings present were to be demolished</p>
CCS Environmental Health	<p>On site 36 former Glamorgan tinsplate works: directly adjacent site 35 former Iron &amp; Brass Foundries: site investigation condition</p>
CCS Education	<p><u>Pontarddulais Primary</u>: Nearly to capacity, as is YGG Bryniago. These developments would generate a need for a new school. (There has already been a lot of development in this area which has already taken up any available surplus capacity at either school). Highway access to both Pontarddulais Primary and YGG Bryniago is a major concern.</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>



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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Foul water drains to Llannant STW. MOU issues. Check with DCWW whether sewer network system is availability in area</p> <p>Aerial photographs show a network of managed hedgerows and a small number of mature trees</p> <p>WFD Moderate</p> <p>Zone C2 at the extreme east of site. The river Camffrwd lies to east of site</p> <p>Minor aquifer</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 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. 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> The Pontarddulais area drains to our Llannant WwTW. The total growth proposed in the region of 900 houses and our Llannant WwTW will not be able to accommodate all of this planning growth without further improvements</p>

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	<p><u>Comments during Pre Deposit Proposals Map Consultation:</u> DCWW have previously raised concerns to development in this area through representations provided at the ‘Vision, Objectives and Strategic Options’ and ‘Preferred Strategy’ stages of the LDP process. Our 66” raw water main transverses the site which, due to its strategic importance, significantly restricts development on this site. This is the most strategic water main in Wales whereby after treatment, supplies water to areas from Carmarthen to the Vale of Glamorgan. You will therefore appreciate that the integrity of this water main cannot be compromised. Unless it can be clearly demonstrated that the risk to the strategic water main can be designed out of the development we strongly recommend that the site should not be allocated in the Deposit LDP. Continued discussion with DCWW is advised</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</p> <p>Llannant WWTW – 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>No coal mining legacy features identified by the Coal Authority.</p> <p>Coal Resource Area – Surface Coal Development Low Risk</p>
Pontarddulais Community Council	<p><u>LDP Strategic Options</u></p> <p>Pontarddulais has significant housing development over the last 15 years and the infrastructure cannot cope with additional development. The schools are full as is the surgery and the existing transport network will not manage further development. Pontarddulais has a Welshness only matched within the City and County of Swansea by the community of Mawr. To continue to introduce new housing development will dilute that Welshness and make Pontarddulais a culturally poorer place.</p>

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### PT002

The Council has considered the proposals from Persimmon Homes for development on the TATA Steel Site (Coated Metals), Tynybonau Industrial Site and land to the north of Tynybonau Road and west of Glynhir Road. The proposal includes:

- a new link road from the junction of Water Street and Station Road to the Lye Industrial Estate;
- retained and improved employment zone with scope for environmental enhancement in the Tynybonau Industrial Estate,
- residential blocks comprising varied densities and diversity of house type on the TATA Steel site (approx. 250 units) and the land to the north of Tynybonau Road (approx. 500 units);
- a central green corridor focused on water main easement;
- public open space consisting of formal play space, recreational areas and semi-natural places;
- access and weight restrictions along High Street, Tynybonau Road and Glynhir Road.

The Council has serious concerns on the detrimental effects of such a development in Pontarddulais. The existing schools are full to capacity and the introduction of 1,000+ additional school children would necessitate the building of an additional school to accommodate such an increase in the local population.

Similarly, the local surgery is struggling to cope with its existing patients and would find it impossible to serve a community increased by an additional 700+ properties. The only viable option would be an extension of the existing facility or the introduction of a new surgery in the town.

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The existing infrastructure is struggling to cope with the current population which has increased by 1,000 between the last two censuses. Roads and sewers will be severely stretched to cope with an ever increasing demand due to the increased volume created by large scale developments such as the above. Without a large financial investment in the local infrastructure this significant development would further increase pressure on current facilities. Pontarddulais is predominantly a rural Welsh speaking community which will continue to be culturally diluted with large scale development of the kind proposed by Persimmon Homes.

### PT007

The Council opposes the use of agricultural land for housing development and the infrastructure and existing facilities of the town are not sufficient to accommodate further development.

### PT008

The Council opposes the use of agricultural land for housing development and the infrastructure and existing facilities of the town are not sufficient to accommodate further development.

### PT011

Drainage problems, unsuitable location, poor vehicular access

### LDP Preferred Strategy comments

1. Any proposed large scale housing development in the area should have regard to the existing infrastructure which would require upgrading and enhancing
2. Any future housing development needs to have a mix of housing types to include bungalows and affordable housing

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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	+1	?	+2	?	?	-2	n/a	+1	+1	n/a	n/a	+1	+1	0	n/a	+1	-1	+1	+1	n/a	?	2	+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	++	?	?	--	--	+/-



## Pontarddulais Transportation and Development Study

Stage Two Final Report Summary

March 2014



Cronfa Amaethyddol Ewrop ar gyfer Datblygu  
Gwledig: Ewrop yn Buddsoddi  
mewn Ardaloedd Gwledig  
The European Agricultural Fund for  
Rural Development: Europe Investing in  
Rural Areas



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## Pontarddulais Transportation and Development Study

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### Stage Two Final Report Summary

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**Report No** 004-UA004542-UE31R-01

**Date** 31<sup>st</sup> March 2014

This report has been prepared for City and County of Swansea in accordance with the terms and conditions of appointment for Pontarddulais Transportation and Development Study dated September 2013. Hyder Consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.



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## Study Stage Two Report Summary

### 1.1 Overview

1.1.1 Hyder Consulting (UK) Ltd has been commissioned by the City and County of Swansea, with funding from the European Agricultural Fund for Rural Development and Welsh Government, to prepare an integrated and comprehensive Transportation and Development Study for Pontarddulais.

1.1.2 The report for Stage One included an assessment of the existing transport infrastructure and travel patterns throughout the town, together with the identification and appraisal of potential transport options to serve key development sites both north and south of the A48. Following extensive technical work and consultation, the report was completed in September 2012 and the findings were reported to the Cabinet of the City and County of Swansea Council on 28th February 2013. The Cabinet Members for Regeneration and Place jointly submitted a report which advised Cabinet of the recommendations of the Hyder Consulting report in order to agree a way forward on transport and infrastructure options in support of further regeneration work in Pontarddulais. The Cabinet agreed:

***“(1) That it does not support further work on the Pontarddulais Southern Bypass;***

***(2) Officers be authorised to further investigate improvements to the Pontarddulais Town Centre Gyrotory and the potential for a Northern Industrial Access Road.”***

1.1.3 Stage Two of the study was commissioned in order to take the recommendations of the Cabinet forward, with the brief for the study including:

- Recommendations on the strategic development direction of the town providing an overview of development opportunities in the context of improved transport access in the town centre and to the northern area of the town;
- Further investigation into the deliverability of the transport option for the town centre, as set out in the Stage One report (namely re-introducing a two way link on the north and east of the town centre one way gyratory);
- Consideration of development opportunities provided by sites in the town centre and the north;
- Further consideration of the deliverability of a Northern Access Road;
- Testing of options in a refined transport model; and
- Presentation of the findings in a regeneration/ development framework report.

### 1.2 Town Centre Improvements

1.2.1 Further work has been undertaken to investigate the deliverability of the transport option for the town centre. As a result, the recommended scheme provides for a two way link from St Teilo Street to Caecerrig Road on Water Street and Tyn-y-Bonau Road. It assumes that Water Street to Tyn-y-Bonau Road is the through route and this would require some land-take on the southern side of the road. There is however the alternative of providing a mini roundabout at this location, should land not be available.

1.2.2 Traffic signals are proposed at the Dulais River Bridge to avoid the need for widening of the bridge. Whilst there are forecast delays at this junction, the solution is shown to operate within capacity, subject to the assumptions of phasing in the signals. The level of development tested is

also the high growth scenario of an additional 750 homes, thus it is a worst case. The widening of the River Bridge to remove the need for a signalised junction can however remain as an alternative/ longer term option for consideration.

- 1.2.3 The proposals assume that the Water Street/ Station Road junction remains in its current configuration although the potential to reconfigure the junction is considered as part of the high growth scenario. The proposals for the town centre can work with either the existing junction layout at this location, or a revised junction.
- 1.2.4 The cost of the recommended works is estimated as £190,000 including for a 5% fee and a 40% Risk and Optimism Bias. It should be noted that no allowance has been made for services diversion and/or protection and the costs of installing traffic signals would be additional, depending on the system employed.

### 1.3 Strategic Development Direction

- 1.3.1 The report has considered the development constraints and opportunities and the potential sites for development in the town. For each site the key issues relating to deliverability are identified. As a result of these investigations, two scenarios for the future development of the town have been set out and assessed.
- 1.3.2 The first scenario is 'Low Growth' whereby 300 homes are developed alongside the town centre improvements, whilst the second scenario is 'High Growth' whereby 750 homes are developed. A development and regeneration framework has been developed for each of two scenarios.

#### Low Growth Scenario

- 1.3.3 The scenario would involve the development of approximately 300 homes within the study area and it is assumed that approximately 50 would be on Site 1 to the south of the Tesco access road and 250 would be on other sites to the north of Water Street. In summary, land parcels that could provide for this development level comprise a total of 16 gross hectares of land.
- 1.3.4 With this scenario, the employment workshops on Site 15 would need to be re-configured to allow for the access road to be provided to Tyn-y-Bonau Road. It could provide the opportunity to improve the site with replacement workshops. Access would be improved to the existing employment sites by the provision of a Northern Access Road from Station Road to Tyn-y-Bonau Road.
- 1.3.5 The growth of the town would further support the existing retail centre. The recommended town centre transport improvements would also support the retail centre by improving the physical environment of St Teilo Street and making it more attractive for pedestrians and cyclists whilst retaining parking and accessibility.
- 1.3.6 In order to achieve the growth scenario, there will be a need to provide a Northern Access Link Road from the Station Road / Water Street junction to Tyn-y-Bonau Road. The current road network is not suitable for the existing mix of employment and housing and further development requires an improved access. The cost of implementing the Northern Access Road for this scenario is estimated as £1.98m.



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- 1.3.7 Valuation and cost calculations have been carried out and overall it appears that subject to suitable planning consents put in place for various sites that latent value may be released and that the cost of the Northern Link Road to accommodate the low growth option may potentially be funded by future land purchases/ sales. However the provision of the Northern Link Route will require land through Site 3 and will impact on three or possibly five small starter units at Glan Llwyd that would need to be acquired for the roundabout access (part of Site 15). This should also be factored into any cost scenario.
- 1.3.8 In conclusion, the low growth scenario could be accommodated provided that the following elements are provided and/ or the need for further investigations is addressed:
- Addressing the planning policy implications of taking forward land as additional sites in the LDP process;
  - Provision of affordable homes in line with CCS policy;
  - Improvements to the town centre road network as set out in Chapter 2;
  - Provision of a Northern Access Link Road from the Station Road / Water Street junction to Tyn-y-Bonau Road;
  - The engagement of the landowners of Sites 3 and 15 in a development package to provide the new access road;
  - The potential need to reconfigure the Station Road/ Water Street/ Tesco access and take third party land, depending on the outcome of consideration of the junction modelling by CCS;
  - Further consideration of the traffic impacts on the wider network, particularly on routes through Hendy and impact on the M4 junctions. Improvements may be need to the Water Street / Fforest Road / Iscoed Road roundabout to the west and the signalised junction of St. Teilo Street / Allt-lago Road / Pentre Road to the east;
  - Consideration of the provision of a bus service to and from the northern area;
  - Improvements to walking and cycling routes including potential for an improved link to the station;
  - Meeting of costs for electricity connections and infrastructure upgrades as well as further investigations of the need for improvements with Dwr Cymru/Welsh Water (hydraulic modelling) and Wales and West Utilities with respect to the low pressure gas main;
  - Support for education provision as the result of ongoing discussions for the LDP;
  - Provision of a Local Equipped Area for Play (LEAP) in a central location;
  - Further exploration of the potential for developer contributions to improve/ expand existing community facilities in conjunction with CCS and the Pontarddulais Partnership.
  - Discussions with the Local Health Board regarding requirements for healthcare provision;
  - Unknowns regarding ground conditions and contamination on the brownfield sites, and ecological/ other environmental issues with all of the greenfield sites;
  - Confirmation of valuation and viability following reduced uncertainty on the above elements; and
  - Consideration of the impacts on the Welsh Language.

### High Growth Scenario

- 1.3.9 The high growth scenario would involve the development of approximately 750 homes within the study area and it is assumed that approximately 50 would be on Site 1 to the south of the Tesco access road and 700 would be on other sites to the north of Water Street. The land parcels that could provide for this development level comprise of more than 28 hectares of land.
- 1.3.10 With this scenario, the employment workshops on Site 15 would need to be re-configured to allow for the access road to be provided to Tyn-y-Bonau Road, potentially impacting on between three and five workshops. It could provide the opportunity to improve the site with replacement/ improved workshops. Land may also be provided within Site 3 next to the existing workshops to allow for an increase in provision, thus enabling there to be additional jobs in the town to be taken up by new households and reducing the impact of out commuting.
- 1.3.11 The growth of the town would further support the existing retail centre. The recommended town centre transport improvements would support the retail centre by improving the physical environment of St Teilo Street and making it more attractive for pedestrians and cyclists whilst retaining parking and accessibility. The level of growth of the town might lead to an increase in the demand for retail units.
- 1.3.12 The high growth scenario will require a Northern Access Link Road from the Station Road/ Water Street junction to Tyn-y-Bonau Road and across the site to join Glanffrwd Road. This would enable access to be provided to the land parcels as well as provide a new access to the Lye Industrial Estate. The access road would therefore open up a significant area of land for development as well as improve access to the existing employment areas of the town and remove a large proportion of heavy goods vehicles from the town streets, particularly Glynhir Road.
- 1.3.13 Two possible options for the Northern Access Road to Glanffrwd Road have been developed, one passing to the north of Tyn-y-Bonau Farm (Option 2a) and the other to the south (Option 2b). Both options continue the route proposed to Tyn-y-Bonau Road presented in the low growth scenario and include the same design standards as the shorter link (7.3 metres with 3.5 metres on each side). The cost of implementing the Northern Access Road for this scenario is estimated as between £2.83-3.65 million, depending on route option.
- 1.3.14 Valuation and cost calculations have been undertaken and it is concluded that overall it appears that subject to suitable planning consents put in place for various sites that latent value may be released and that the cost of a Northern Access Road to accommodate the high growth option may potentially be funded by future land purchases/ sales.
- 1.3.15 The provision of the Northern Link Route will require land through Site 3 and this will impact on the cost scenario. Moreover, three or possibly five small starter units at Glan Llwyd would potentially need to be acquired for the roundabout access and part of the land in Site 3 could be identified for new workshops and potentially a community/ sports facility.
- 1.3.16 In conclusion, the high growth scenario could be accommodated provided that the following elements are provided and/ or the need for further investigations is addressed:
- Addressing the planning policy implications of taking forward land as additional sites in the LDP process;
  - Provision of affordable homes in line with CCS policy;
  - Improvements to the town centre road network as set out in Chapter 2;



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- Provision of a Northern Access Link Road from the Station Road / Water Street junction to the Lye Industrial Estate;
- The engagement of the landowners of Sites 3, 8 and 15 in a development package to provide the new access road;
- If Site 5 is included there would be a need for a separate access from Tyn-y-Bonau Road for this site.
- Addressing the constraint of the Welsh Water Strategic Water Main within Site 12. This will add to risks and construction costs and these would need to be quantified at detailed design stage in conjunction with Welsh Water;
- The need to reconfigure the Station Road/ Water Street/ Tesco access and take third party land;
- Further consideration of the traffic impacts on the wider network, particularly on routes through Hendy and impact on the M4 junctions. Improvements may be need to the Water Street / Fforest Road / Iscoed Road roundabout to the west and the signalised junction of St. Teilo Street / Allt-lago Road / Pentre Road to the east;
- Provision of a bus service through the northern area;
- Improvements to walking and cycling routes;
- Development of a detailed masterplan for the northern part of the town;
- Meeting of costs for electricity connections and infrastructure upgrades as well as further investigations of the need for improvements with Dwr Cymru/Welsh Water (hydraulic modelling) and Wales and West Utilities with respect to the low pressure gas main;
- Support for education provision as the result of ongoing discussions for the LDP;
- Development of a green infrastructure strategy and provision of a Neighbourhood Equipped Area for Play (NEAP) in a central location;
- Undertaking of a social and community infrastructure study to fully identify future needs and consider the potential for including a new community hall/ sports centre in a development;
- Discussions with the Local Health Board regarding requirements for healthcare provision;
- Unknowns regarding ground conditions and contamination on the brownfield sites, and ecological/ other environmental issues with all of the greenfield sites;
- Confirmation of valuation and viability following reduced uncertainty on the above elements; and
- Consideration of the impacts on the Welsh Language.

### 1.4 Conclusions

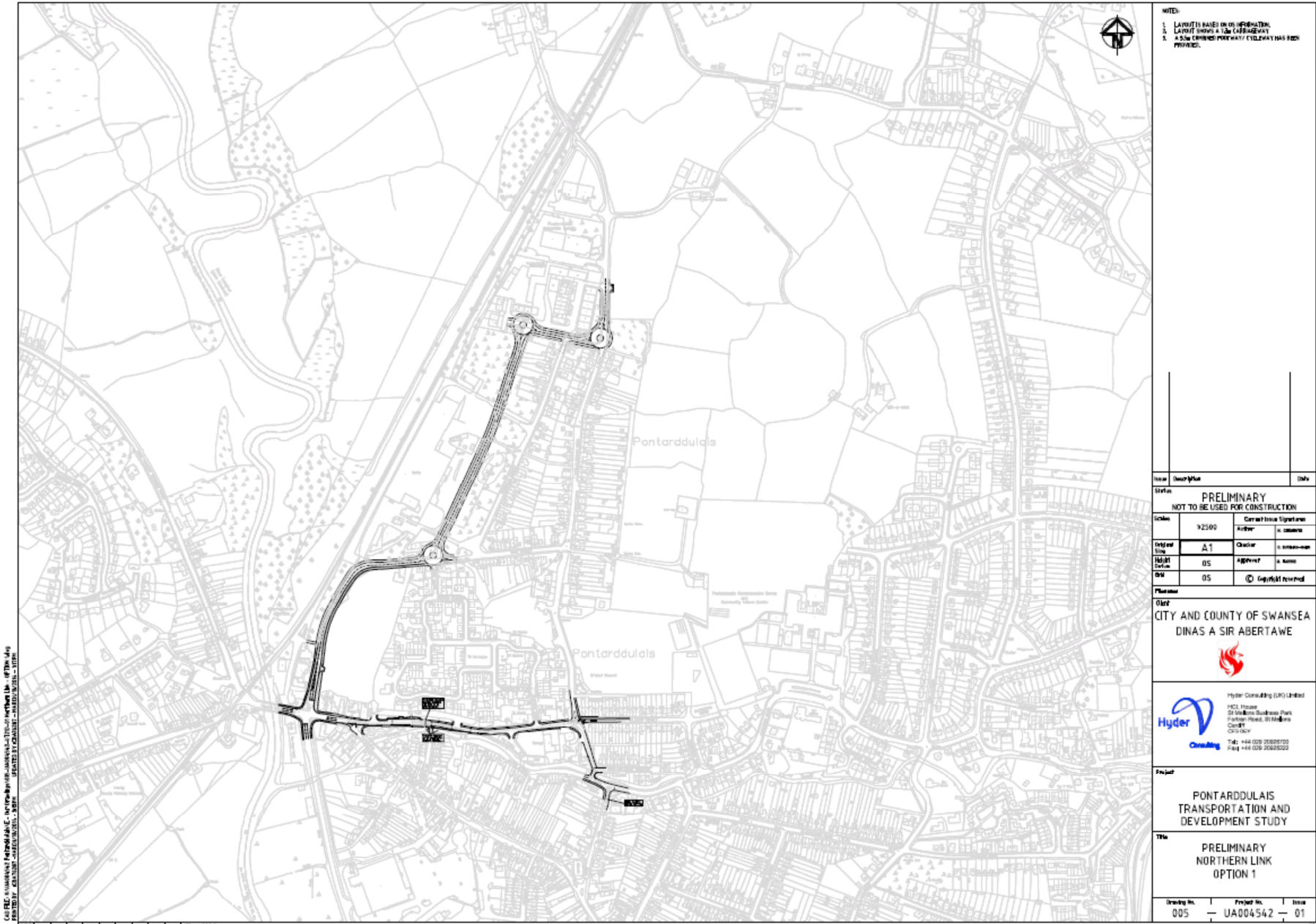
1.4.1 The Stage Two study has investigated the town centre and northern access road improvements and considered the potential for and implications of two growth scenarios for the future development of the town.

1.4.2 The Vissim modelling work and transport economics report has identified that the combination of improvements to the town centre road network and a northern access link offers considerable benefits for traffic in the town in the future. It is considered however that neither growth scenario should ideally take place unless transport improvements are brought forward.

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- 1.4.3 With respect to the two levels of growth, there are many factors to consider and the determination of a way forward will be a matter for the Local Authority as part of the LDP process and in consultation with the community. The report has highlighted the risks to delivery (land ownership being a key constraint), further investigations required and likely impacts for each scenario. It can be concluded that the low level of growth can be accommodated with relatively low impact. However, whereas the high level of growth would have more impact it could bring greater benefits in terms of a road link to the Lye Industrial Estate, additional employment units, and community facilities for example.
- 1.4.4 For either level of development there will be a need to carry out further dialogue with land owners and the necessary investigations to take it forward.

# PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015



NOTES:  
 1. LAYOUT IS BASED ON THE INFORMATION PROVIDED.  
 2. LAYOUT IS SUBJECT TO THE LOCAL AUTHORITY'S APPROVAL.  
 3. A 5% CHANGES PERMITS/ EVIDENCE HAS BEEN PROVIDED.

Issue	Description	Date
<b>PRELIMINARY</b>		
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Scale	1:2500	Contractors Signature
Original Scale	A1	Client
Issue	05	Approved
Drawn	05	Copyright reserved

**CITY AND COUNTY OF SWANSEA**  
 DINAS A SIR ABERTAW



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**Project**  
 PONTARDDULAIS  
 TRANSPORTATION AND  
 DEVELOPMENT STUDY

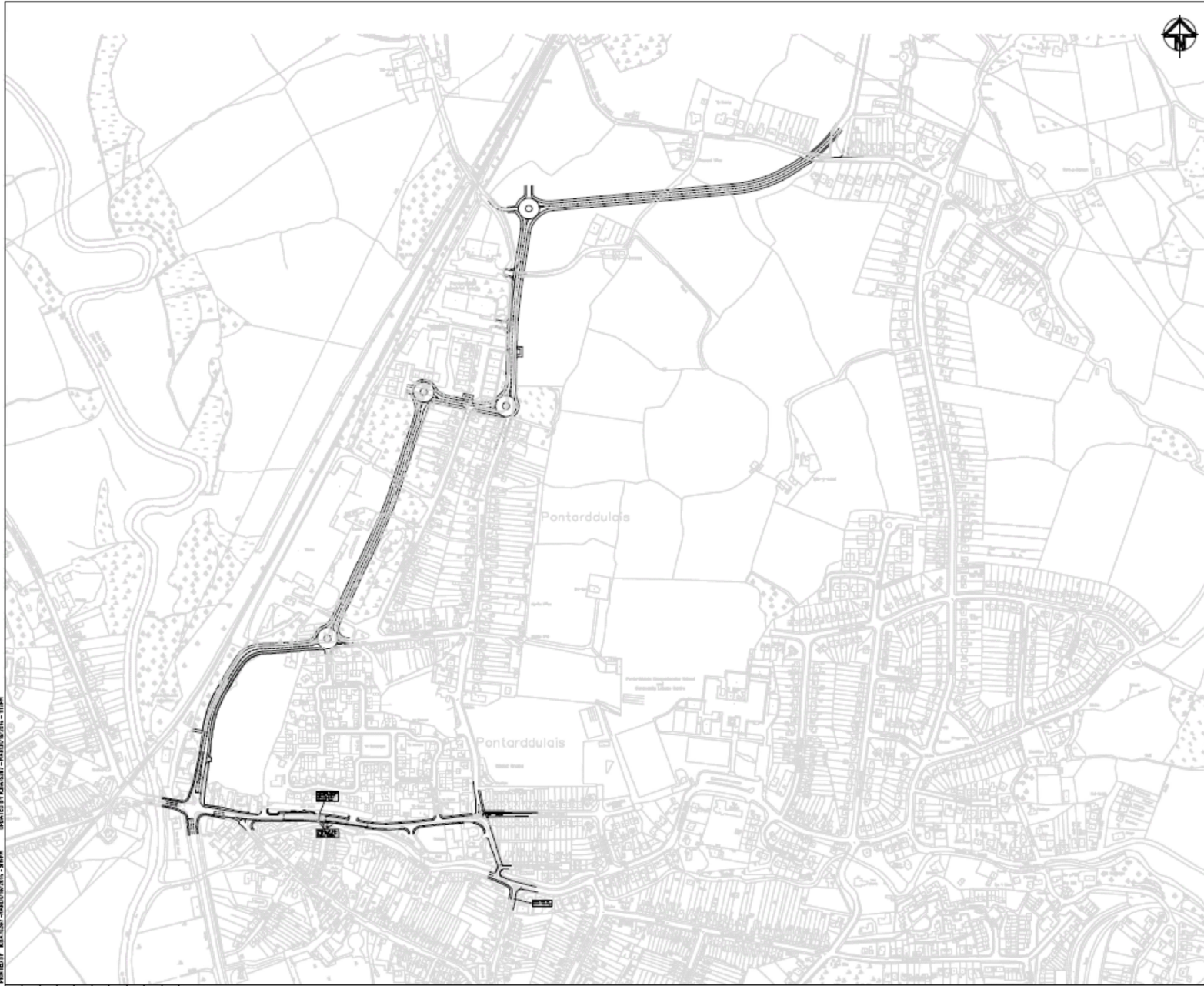
**Title**  
 PRELIMINARY  
 NORTHERN LINK  
 OPTION 1

Drawing No.	Project No.	Issue
005	UA004542	01

CAD FILE: SWANSEA PONTARDDULAIS TRANSPORTATION AND DEVELOPMENT STUDY - PONTARDDULAIS - NORTHERN LINK OPTION 1 - 150715  
 PRINTED BY: KAZEM SADEGHZADEH - 15/07/2015



# PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015



**NOTES:**

1. LAYOUT IS BASED ON THE INFORMATION
2. LAYOUT SHOWS A 10M CARBONATE
3. A 50M CARBONATE FORWAY CYCLEWAY HAS BEEN PROVIDED.

Issue	Description	Date

**Scale**  
**PRELIMINARY**  
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Scale	1:2500	Author	Current Issue Signature
Original Size	A1	Checker	
Plot Size	D5	Approved	
DS	DS	Copyright reserved	

**Plan Area**  
**CITY AND COUNTY OF SWANSEA**  
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**Project**  
**PONTARDDULAIS**  
**TRANSPORTATION AND**  
**DEVELOPMENT STUDY**

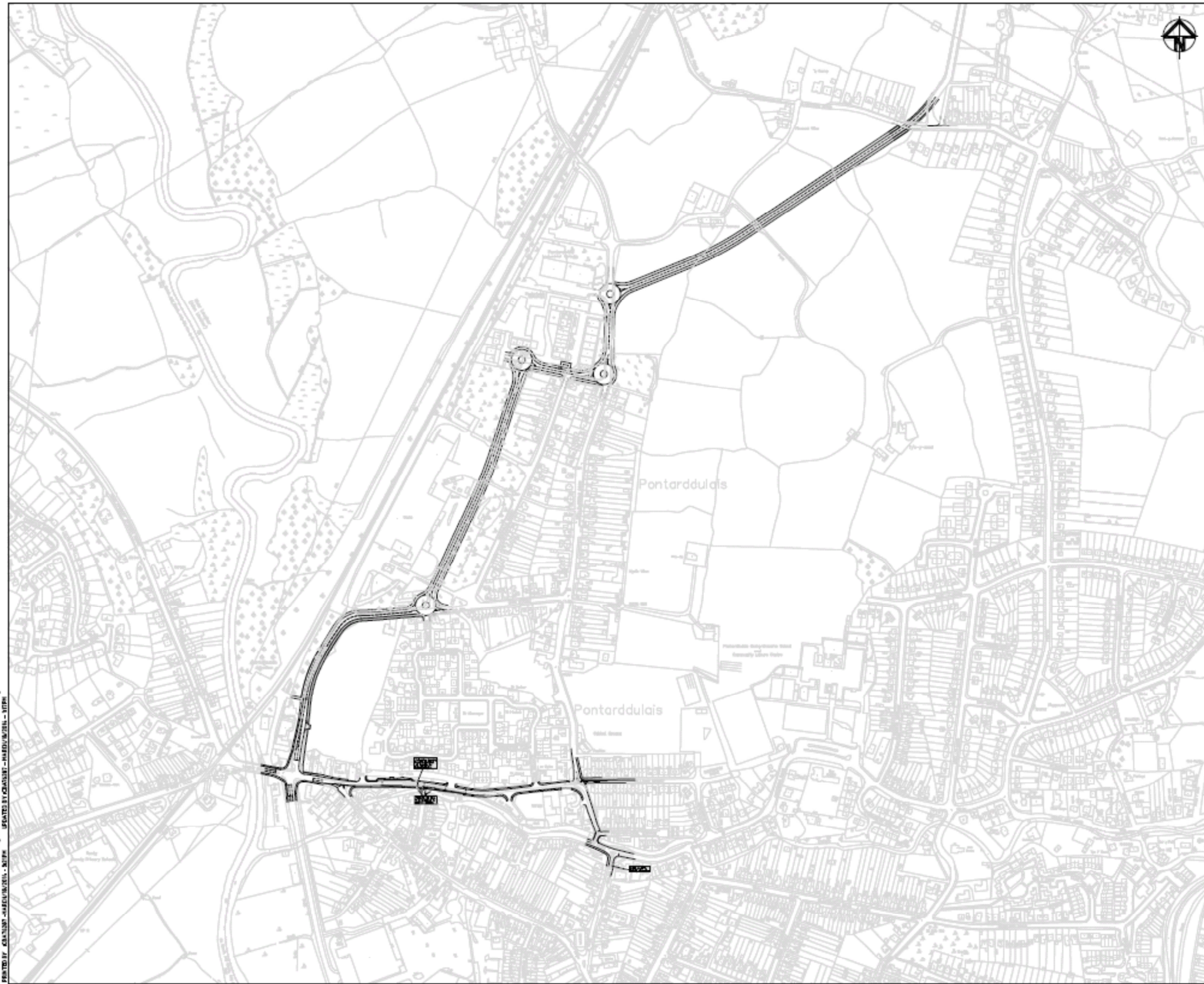
**Title**  
**PRELIMINARY**  
**NORTHERN LINK**  
**OPTION 2a**

Drawing No.	Project No.	Issue
006	UA004542	01

DRAWN BY: J. JONES  
 CHECKED BY: J. JONES  
 DATE: 15/07/15  
 SCALE: AS SHOWN  
 PROJECT: PONTARDDULAIS TRANSPORTATION AND DEVELOPMENT STUDY  
 DRAWING NO: UA004542-01



# PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015



**NOTES:**

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2. LAYOUT SHOWS A 12M CARBONWAY.
3. A 3.5M CROWNED FOOTWAY CYCLEWAY HAS BEEN PROVIDED.

Issue	Description	Date

**Scale:** PRELIMINARY  
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Scale	1:2500	Author	J. S. JONES
Checked	A1	Checker	J. S. JONES
Project	05	Approved	J. S. JONES
Date	05	Copyright	Reserved

**Plan name:**

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**Project:** PONTARDDULAIS  
TRANSPORTATION AND  
DEVELOPMENT STUDY

**Title:** PRELIMINARY  
NORTHERN LINK  
OPTION 2b

Drawing No.	Project No.	Issue
007	UA004542	01

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PLANNING COMMITTEE – 6<sup>TH</sup> JULY 2015

<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>

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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 over 4700 homes are needed within this strategic housing policy zone over the LDP period.
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	<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  <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
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	MOU  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.
Dwr Cymru	<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.  <u>Site Specific Comments on the Draft Proposals Map</u> : A water supply can be made available to service the proposed development site.

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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

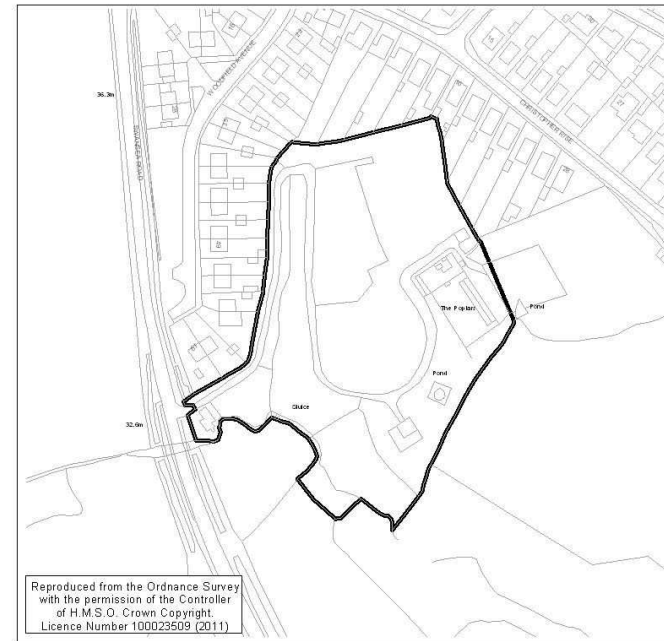
**Stage 3B: Assessment Against SEA/SA Objectives**

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>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.

### 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>

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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 over 4700 homes are needed within this strategic housing policy zone over the LDP period.
CCS Biodiversity	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.
CCS Environmental Health	No comment
CCS Education	<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  <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
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	MOU.  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).
Dwr Cymru	<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.  <u>Site Specific Comments on the Draft Proposals Map</u> : A water supply can be made available to service the proposed development site.

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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> 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

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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>

**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

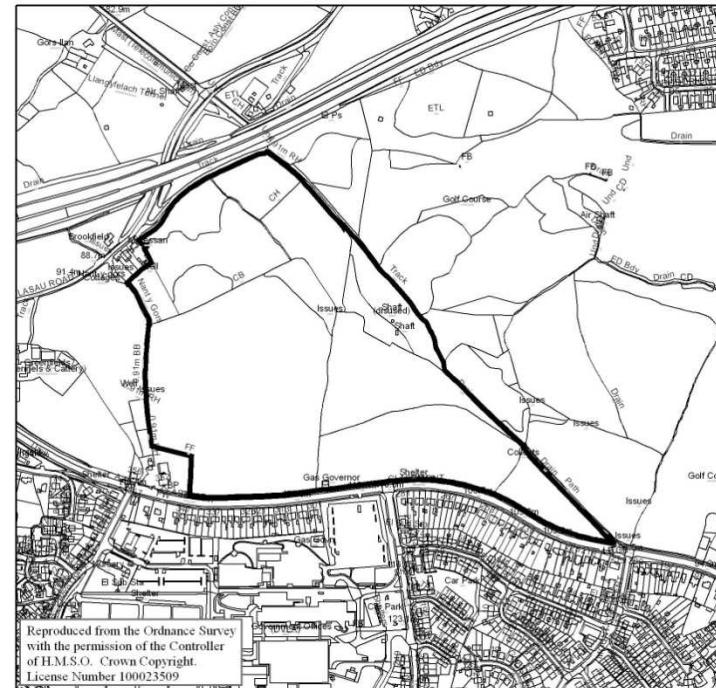
**Stage 3B: Assessment Against SEA/SA Objectives**

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>MB005 (partly in Llangyfelach Ward)</b>
<b>Name</b>	<b>Land off Clasemont Road, Morriston</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 effect 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 effect 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	<p>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.</p> <p>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.</p>

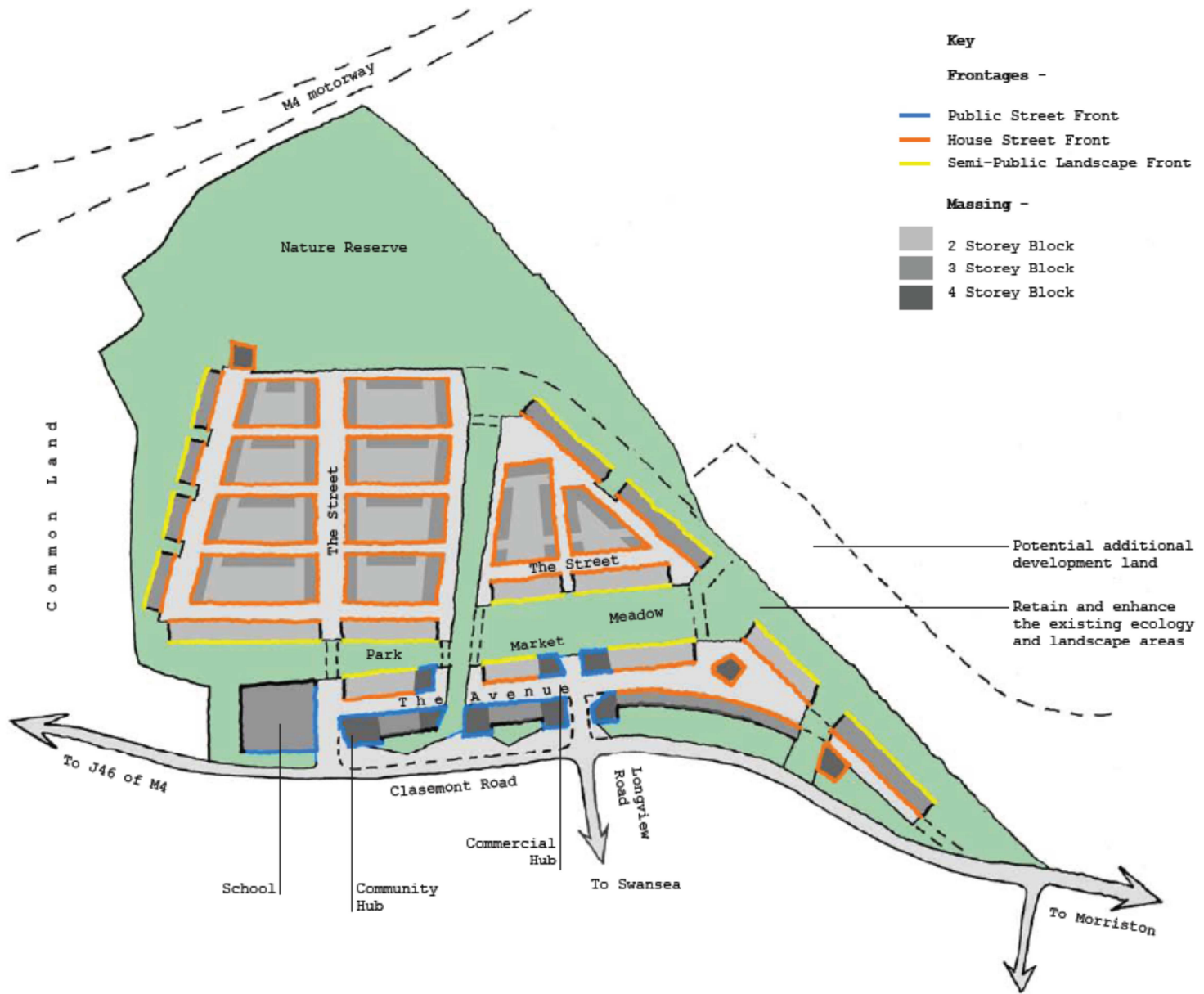
**Stage 3A: Assessment Against LDP Objectives**

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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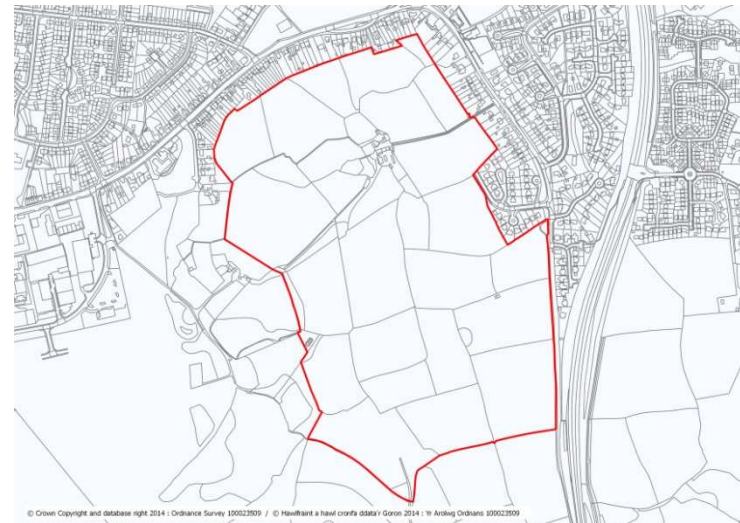
Proposed massing and streetscape plan



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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.

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- 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

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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.

### Special Planning Committee 04/06/15

#### Petitioner Mr David Harris

*In the time allocated we will limit our Reply to the more pertinent issues affecting the site and the inaccurate reporting to date by Officers .On all other matters we will rely on the representations already made by the Community Council .*

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*The highway problem that currently exists in Penllergaer is clear for all to see, and objections to the development on this ground is well and quite rightly documented. Special Planning Committee Meeting Dated the 4<sup>th</sup> June 2015*

*The Preferred Strategy said of this site that “This proposal is predicated on the delivery of a new road” and “has the potential to alleviate congestion in the area .... “.*

*This statement is based upon comments made in the Council’s own “Topic Paper” on transport dated August 2013.*

*The Topic Paper was drafted long before the so called “strategic sites” in and around Penllergaer had been identified .The impact of these sites on the transport network therefore has not properly considered.*

*Nevertheless, the Topic Paper identified that The M4 junction was at capacity levels, and in order to support development at Felindre major improvements were required to the motorway junction together with four other major roadwork schemes to the surrounding areas. The Topic Paper also recognised that there was limited opportunity to carry out further on the motorway junction.*

*One of these schemes is the new road serving this site.*

*What everybody is forgetting is that the development of Parc Mawr Farm is now 4 times larger than the original Candidate site upon which the Council based their report. As a consequence , the housing development despite the road will put greater strains on the highway network .The road proposed will not alleviate the problem in this area , the housing it serves **will add to it***

*The Preferred Strategy requires that prior to the Deposit and any site allocation there has to be, amongst other items, an assessment carried out for the requirement for physical infrastructure to serve that site. Such an assessment has yet to be concluded, and therefore absent from any of the recommendations made by Officers to date.*

*The Council has completely failed to address the highway problem , and in so doing they are unable to satisfy the criteria of their own Sustainable Growth Strategy , in particular I would remind you that “ The role of the planning system in creating sustainable communities , and the general presumption in favour of sustainable development , are embedded principles within national planning policy . .....The LDP therefore places a strong emphasis upon the importance of ensuring that this growth is supported by appropriate and improved physical and community infrastructure. “*

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*Until the Council are able to demonstrate that this, this site should not be considered or debated for inclusion in the LDP.*

*Turning now to the matter of objections raised on the question of overcrowding and overdevelopment .Your Officers feel this is a matter that is dealt with at planning application stage, but they really are missing the point.*

*There are 1200 households in the Ward of Penllergaer, of which 300 are situated at Parc Penllergaer and therefore remote from the village. The village therefore has 900 houses, and the proposed development will add a further 1000 or so to this number. If this was to happen it would completely destroy the character and identity of the village.*

*This proposal ignores PPW guidelines 9.3.1 , 9.3.2 , 9.3.3 and 9.3.4 in that ( a ) it is not well integrated and connected to the existing pattern of settlements , ( b ) it is a significant incremental expansion of housing that cannot be support by public transport (c ) intensive infilling should not be allowed to damage an area’s character and amenity and (d ) the planning authority should ensure that that the area’s character and amenity is not damaged .*

*If I could now jump to the matter of the Green Wedge. We fully accept that Green Wedges do not have the same permanence as a Green Belt, but the need to protect the open land around Penllergaer has not changed and therefore its retention needs to be protected. If this is the case, PPW dictates what is acceptable, and the proposed form of this development does not meet that criteria.*

*The residential proposal obliterates this previously identified protection, but when the link road is then taken into consideration, question must be raised as to whether all of the Green Wedge is now lost.*

*Can I remind Members of Policy 5 of the Preferred Strategy in relation to Green Infrastructure which says “ Green infrastructures will be provided through the protection and enhancement of existing green spaces .....Development that unacceptably compromises the extent and quality of green provision will not be supported . “*

*Finally, Offices are saying that “Increased numbers cannot be attributed to the proposed strategic allocation near the former Felindre works site”, arguing this is dictated by building outputs. This is annoyingly wrong. Officers have confused building outputs with achievable sales, as well as relying upon inaccurate data. Of course developers can complete more than two*

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*houses a week, the question is how many can they sell? A Planning Inspector engaged recently in a dispute at Llandarcy decided an acceptable sales figure for this site, which is no different to that at Felindre, to be 175 units a year. This is during a distressed economic period. Accepting this precedent and that the LDP is anticipating growth, this figure will increase and in so doing could fully satisfy the relocation of housing from Penllergaer to Felindre.*

*Conclusion*

### **Developer Representations at Special Planning Committee 08/06/15:**

#### **Mr Robin Williams, Asbri Planning**

*Chair and Members of the Planning Committee, my name is Robin Williams and I am the Managing Director of Asbri Planning Ltd. I thank you for this opportunity to speak in favour of the proposed LDP Strategic Site allocation at Parc Mawr, Penllergaer.*

*I represent Bellway Homes who wish to see a high quality form of residential development which will also deliver significant benefits to the local community and improve the transportation network in the area.*

*In the LDP Strategic Options document, published in October 2012. The general area of Penllergaer was shown diagrammatically as a potential Mixed Use Major Development Area. It was stated that opportunities existed to:*

- *Consolidate the existing pattern of development*
- *Improve the settlement's sustainability credentials,*
- *Provide a focus for the community, and*
- *Provide traffic and transportation benefits*

*With these aims in mind, in January 2013, Asbri Planning Ltd, on behalf of Bellway Homes, set up a team of consultants to appraise the Parc Mawr site in terms of Transport, Landscape, Ecology and Drainage and to develop options for a future 'Masterplan'. The whole corridor of land, largely in the ownership of Penllergaer Estates, was examined, with particular regard paid to potentially sensitive areas in landscape and ecological terms.*

*The development of a large scale option emerged as the preferred choice for several reasons, notably:*

- *It would achieve a more comprehensive form of development, allowing not only for a new school but for additional community and commercial uses which would form a hub which would also link with existing facilities in the area*

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- *A link road – connecting the A4240 Gorseinon Road with the A483 – would be provided which has the potential to remove through traffic along the A4240 and A48 through Penllergaer, the potential link will also relieve congestion at Junction 47 of the M4.*
- *The development would avoid encroachment into the more exposed landscape areas to the south. It would also allow ecological mitigation on land to the south which would remain undeveloped.*
- *It would provide a site which would allow Bellway Homes to develop in the Plan Period up to 2025 for a range and choice of housing opportunities at building rates experienced on their current Parc Penderri site to the north of Gorseinon Road. It would therefore form a major contribution to meeting the 5 year housing land supply shortfall which currently exists in Swansea.*

*Ongoing discussions with Council officers led to the preparation of a document, ‘A Vision for Penllergaer’ which was formally submitted at the draft LDP Preferred Strategy stage with the aim of supporting the proposed strategic site allocation while demonstrating to Council officers and elected members that an acceptable form of development could be achieved. Such informed proposals also allowed for positive comparison of the merits and advantages of the site with other alternatives.*

*Penllergaer lies in the Greater North West Swansea Housing Zone which is the largest of the Strategic Housing Policy Zones and has accommodated a significant proportion of the City’s growth in recent years. The LDP Preferred Strategy recognises this and identifies the need for around 5,800 new homes in this zone which will be delivered through a combination of large scale strategic releases and smaller allocations.*

*The scale of housing required the identification of Mixed Use Major Development Areas, one of which corresponded with the Parc Mawr site. The Preferred Strategy, which was ratified by Full Council in August 2014, emphasises that only development on this scale can deliver the required community and infrastructure benefits and that if such sites do not emerge then a considerably greater number of smaller sites will need to be released on greenfield land at edge of settlement locations throughout the County.*

*The subsequent identification of the site with specific boundaries shown on the draft Deposit Plan Proposals Maps was therefore welcomed by my clients, on whose behalf supporting representations were made.*

*It is understandable that growth of the scale proposed has generated concerns in the local community as shown by the letters of objection and a petition which were submitted in response to the consultation exercise held earlier this year.*

*The points made by officers in response, which are included in the site schedule, appended to the Committee Report, adequately address these concerns. However, Bellway Homes continue to acknowledge that further work is needed. With this in mind detailed*

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*studies have already been commissioned which will contribute to the LDP evidence base and which will further justify the site's selection. It is also anticipated that these will allow further clarification of matters raised, particularly by the Key Stakeholders.*

*I therefore urge the Committee and the Council as a whole to continue to give the site positive consideration through the LDP process and I look forward to its formal allocation in the forthcoming Deposit Plan.*

### 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 a 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	No issues

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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>
<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>:  <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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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

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.

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.

PG0002 Land at Parc Mawr Farm 12.0 Hectares  
Current Use: Agriculture Proposed Use: Residential

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.

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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	<p><u>In response to Preferred Strategy:</u></p> <p>1.1. The Community Council is responding on behalf of residents to the housing development proposals for Penllergaer as contained in the Preferred Strategy.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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### 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

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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.

7. Green Wedge

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

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.

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)

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)

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.

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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 Felindre 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 Felindre 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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	<p>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.</p> <p>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.</p> <p>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.</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	+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

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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 on proposed connection to Penllergaer</u>                      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. 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. 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>
	The Community Council is of the opinion that there should be no residential development

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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	-	?	?	++	--	+/-