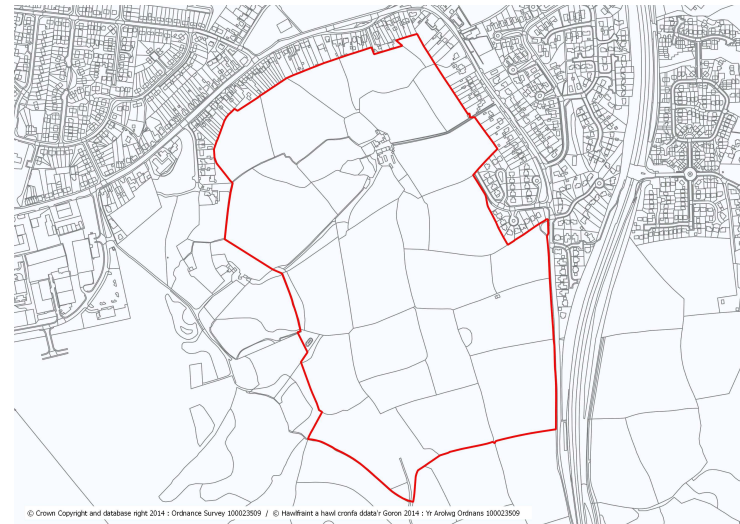


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<b>Reference</b>	<b>PG002</b>
<b>Name</b>	<b>Land at Parc Mawr Farm, Penllergaer</b>
<b>Description</b>	Proposed strategic development site to south of Penllergaer and west of A483. Identified as a potential major mixed use development area in Preferred 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.



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Key Stakeholder Consultations

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

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

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

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

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

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

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

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

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	<p>It is the Community Council's opinion that large scale residential development on green wedge land in Penllergaer would conflict with Planning Policy Wales' stated aims for green wedge use and would not, in any event, provide affordable housing for local needs</p> <p>The Community Council is also of the view that significant consideration should be given to the impact that further residential development would have on Penllergaer Primary School which is already over capacity. They have concerns not only in respect of the optimum size of a primary school in terms of best outcomes for children but also in regard to the associated traffic that would be generated by further housing developments. Penllergaer Primary is currently the catchment school for remoter parts of the Penllergaer ward, such as Parc Penllergaer, and is also in catchment for Tircoed Village which is likewise remote and in the Llangyfelach ward. The distance of these developments from the school gives rise to large scale car use and massive issues around traffic management and road safety both morning and afternoon in the areas closest to the school. Further residential development, especially those remote from the school, will only exacerbate these already difficult problems.</p> <p>In conclusion, the Community Council would request that the contents of this letter and accompanying documents are examined and fully considered during the assessment process of candidate sites as they represent a reflection of the residents' views evidenced at three public meetings held in Penllergaer in respect of the LDP.</p> <p>PG0002 Land at Parc Mawr Farm 12.0 Hectares Current Use: Agriculture Proposed Use: Residential</p> <p>This site was rejected for inclusion in the IHLPS, the conclusion being in the Site Assessment Statement (Ref. CCS090) that it would represent a substantial release of green field land and would have an adverse visual impact.</p>
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	<p>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</p> <p>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.</p> <p>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</p> <p>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.</p> <p>Para 2.15(iv) refers to protecting the setting of the urban area and to the fact that</p> <p>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.</p>
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	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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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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	<p>2. Economic and Employment</p> <p>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.</p> <p>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'.</p> <p>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.</p> <p>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.</p>
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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.

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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.

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	<p>6. Wildlife and Biodiversity</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>6.5. In its view, land at Parc Mawr farm forms a significant tract of open countryside on the urban fringe where there is clear evidence of high biodiversity, making it of considerable ecological value and an important part of the green infrastructure.</p>
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	<p>7. Green Wedge</p> <p>7.1. The land at Parc Mawr farm also forms part of the Green Wedge as designated in UDP Policy EV23, and amplification 1.7.5g and based on Planning Policy Wales Guidance</p> <p>7.2. Whilst the Community Council acknowledges that Green Wedge boundaries can be redefined to reflect changes in strategic policy it would point out that the City and County robustly defended the Green Wedge designation for land at Parc Mawr in its response to Proof of Evidence at a public inquiry as recently as 2007.</p> <p>7.3. In the Response by the City and County to Proof of Evidence, April 2007 para 3, (entitled The Council's Response) page 5 sub para 2.15(i) Green Wedge designation is cited as important for the 'Prevention of coalescence. It acknowledged that the proposed omission site would not in itself lead to coalescence between Penllergaer and Fforestfach. However, development of the larger site area would and the Council considers the proposal to be the thin end of a very large wedge. If the omission site was released as proposed, it would immediately put land to the west and adjoining access road under pressure for development. If the agricultural unit subsequently proved unviable there would be further pressure to release land extending south of the current settlement limits, thereby contributing to coalescence. (Appendix 3a)</p> <p>7.4. It goes on to say that the Green Wedge is an important tool to manage the urban form and that in this location, the frontage development on Swansea Road and Gorseinon Road limits the development to the rear. A breach of this containment would open up the possibility of further development to which there would be no defensible boundary. Para 2.15(ii)</p> <p>7.5. In para 2.15(iii) there is reference to safeguarding the countryside. It states that Parc Mawr farm is part of the open countryside. It is certainly not perceived as being part of the urban form. Furthermore, as the land is located in close proximity to the M4 it will remain under constant pressure for development: hence the extra protection of Green Wedge status is essential.</p>
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7.6. In the Community Council's view the arguments used by the City and County in 2007 - only six years ago - for the retention of the land Parc Mawr within the Green Wedge were robust and logical. It would therefore be difficult for the community to understand the justification for any change in this position.

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

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

### 8. Education

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

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

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

### 9. Alternative housing locations

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

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

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

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

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

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

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

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	<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</u> on proposed connection to Penllergaer</p> <p>Residential use would generate exiting traffic in the morning peak which is difficult from the site when the main road is busy. There may be a need to consider some form of traffic control at the access junction. Comments on local congestion at J47 would still apply.</p> <p>With regard to the pedestrian link issue, there is a presumption against bridges as they are less inviting and a preference for at grade crossings, however, crossing the A483 would be particularly difficult and so addressing the linkage issue is probably critical.</p> <p>In terms of traffic capacity and road safety would favour a pedestrian /cycle bridge link across the A483. In addition access /egress from the site onto the A48 would need to be improved; perhaps with the introduction of a roundabout at the access There is also opportunity to link this in to onward routes in order to make its use sustainable.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that over 4,700 homes are needed within this strategic housing policy zone over the LDP period.</p>

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<p>CCS Biodiversity</p>	<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>
<p>CCS Environmental Health</p>	<p>Possible noise conflict with M4</p>
<p>CCS Education</p>	<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>
<p>Corporate Property</p>	<p>Site has the potential to be retained for office use as well as having potential for redevelopment for various alternative uses, such as residential, leisure, hotel, public house/restaurant</p> <p>Market demand exists for the whole of the site</p>

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

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

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	<p>The Community Council is of the opinion that there should be no residential development on this site which would be in a location remote from the centre of Penllergaer. It would therefore be car dependent with the only available safe walking route currently via Parc Penllergaer, already a substantial distance from community facilities. Whilst the shortest walking route would be across the A483 close to J47, this is an extremely busy dual carriageway at all times and the installation of a pedestrian crossing would seem unrealistic in terms of traffic flow and concentration, potentially adding to delays and queuing at an already overloaded junction..</p> <p>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.</p> <p>The Community Council therefore objects on the behalf of resident to any residential development in this location.</p>
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**Stage 3A: Assessment Against LDP Objectives**

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

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

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



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



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

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

5 letters of objection were received which are summarised below:

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

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

No comments were received specifically regarding this site.

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

1 letter of objection received which is summarised below:

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

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

### Response to Representations

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

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

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**Key Stakeholder Consultations**

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

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

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

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

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

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

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