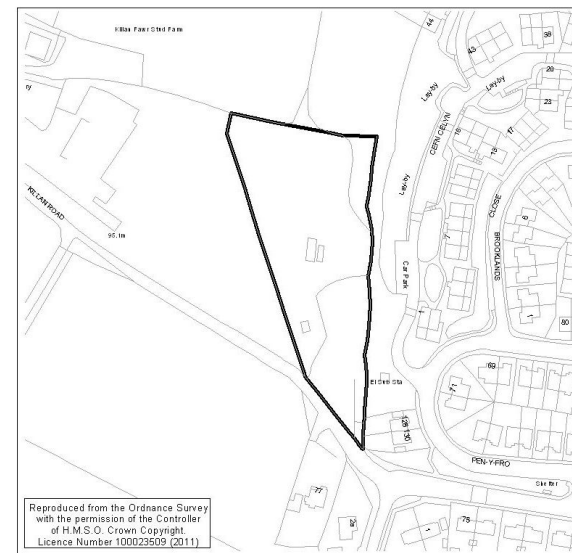


## PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015

<b>Reference</b>	<b>DU003</b>
<b>Name</b>	<b>Land to the rear of 104 Killan Road, Dunvant</b>
<b>Description</b>	The site is located to the rear of a recently constructed detached dwelling on land which forms part of the residential curtilage. It is currently defined as open countryside in the UDP. The site would be accessed by creation of a new simple priority T-junction with Killan Road. Access to the existing property would remain separate. An application for 15 affordable dwellings on the site has been approved which has established the principle of development albeit for restricted occupancy dwellings. As a binding legal agreement remains unsigned for more than 12 months since planning permission was granted the site must be considered as a proposal rather than a commitment.
<b>Size</b>	0.675 Hectares
<b>Existing Land use</b>	Residential
<b>Proposed Land Use</b>	Residential (100% affordable)
<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.

8 letters of objection were received which are summarised below:

- Extension into the open countryside.
- Coalescence of communities.
- Encroachment into green belt.
- Inadequate road infrastructure.
- Flood risk/drainage issues.
- Inadequate local facilities e.g. surgeries/schools.
- Sensitive area in terms of AONB.
- Loss of recognisable boundary will make it difficult to defend pressure in future for further land release.

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

No comments were received specifically regarding this site.

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

No comments were received during this stage.

## Response to Representations

- The UDP identifies the land as green wedge and being within the open countryside. However, upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions, e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. It is recognised that the site forms part of a wider green area which prevents the coalescence of Dunvant and Three Crosses. This has been taken into account in the assessment of the candidate sites within this area and also during the settlement boundary review process. The site has been granted planning permission to extend the settlement for a development of affordable housing to be developed as an exception to UDP policy.
- It is proposed that the site continues to be excluded from the settlement boundary in the LDP to ensure that potential future applications will also be limited to rural exceptions housing – it will not set a precedent
- Highways /access improvements would be a condition of any development being brought forward in accordance with a scheme agreed with the Highways Authority. A scheme could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for the site.
- Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW have invested in a new hydraulic model for the Gowerton catchment which has identified solutions throughout the catchment which would have to be delivered prior to development occurring. In combination with this there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements.
- Development also has a positive impact by increasing local populations and supporting local community services and facilities.
- 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

## PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015

- The site is not within the AONB although previous appeal decisions have referenced the impact of development on the AONB. The Strategic Housing Market Assessment has identified the Gower AONB and Fringe as an area where there is a need for up to 500 affordable houses, but no need for further market housing. Particular issues in this area are lack of affordable housing for first time buyers and lack of older person's accommodation. Such development should have a positive impact on the local economy by enabling people to stay in their local communities who would not otherwise be able to afford market housing. Current national and local planning policy (UDP Policy EV18) already permits the release of land adjoining Gower AONB/Fringe settlements as exception sites for the specific purposes of providing local needs affordable housing for those who cannot be reasonably be accommodated through the area's general housing market. National policy is not changing therefore local policy will remain unchanged through the adoption of the LDP regardless of whether or not a specific site is allocated for development. The release of land for such purposes would be an exception and not set a precedent.
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access improvements are likely to be necessary</p> <p><u>Local Highway Conditions:</u> There is congestion near the site due to the presence of a primary school. The road fronting the site is rural in nature without pedestrian footways.</p> <p><u>Accessibility:</u> There is an hourly service past the site and a half hourly service within 100m. Bus service provision is therefore reasonable.</p> <p><u>Wider Issues / Combined effect:</u> The site could potentially have an adverse impact on the local highway infrastructure if developed as well as the site opposite (DU002). There would be safety concerns along the frontage, in the vicinity of the adjacent school and along the route leading from the site to Dunvant / Killay. There are issues of missing footway links and an inadequate bridge along this route which will require addressing if this and a combination of sites are developed.</p>

**PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015**

	<p><u>Restrictions</u>: A small number of dwellings (up to 5) could be considered with minor improvements to access. However, the affect on local issues as identified will need to be considered.</p> <p><u>Transport Proposals</u>: A need for safety improvements has been identified.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site overlaps with; Upland Mixed Ash Woodland supporting an assemblage of ancient woodland indicator species.</p> <p>Upland Mixed Ash Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under NERC.</p>
CCS Environmental Health	<p>site lies partly over site 005 former Killan Colliery: unforeseen contamination condition</p>
CCS Education	<p>Catchment Schools –</p> <p><u>Pen Y Fro Primary</u>: There is no particular concern in respect of the proposed site as there is sufficient capacity within the primary school and the site is capable of expansion</p> <p><u>Gowerton Comprehensive</u>: Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Consider MOU. The majority of site outside of sewered area. However, the closest connection is Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p>

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	<p>The eastern and northern boundaries of the site are composed of mature trees, these should be protected in order to ensure connectivity. Possible SINC sites/issues to the north.</p> <p>Potential mine water discharges from north?</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	<p>There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.</p>
Coal Authority	<p>Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth and approximately 2 mine entries</p>

PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015

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

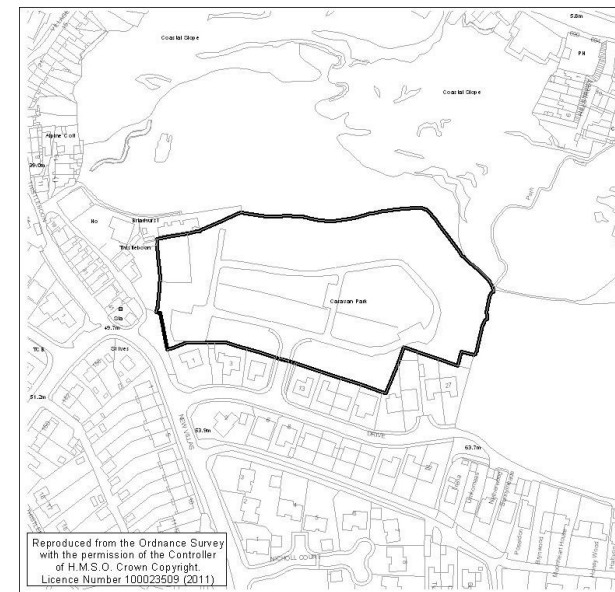
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-1	n/a	+1	n/a	n/a	n/a	n/a	+1	-1	n/a	-1	0	-1	-1	?	?	+1	+1

**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	+	+	-	?	+	-	--	?	-	-	?	+	?	?	--	+/-	+

PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015

<b>Reference</b>	<b>OY003</b>
<b>Name</b>	<b>Thistleboon Caravan Park</b>
<b>Description</b>	Static Caravan Park adjoining Mumbles Hill Local Nature Reserve. Located to the north of and served from Thistleboon Drive. Bounded by Thistleboon Rd to the west and the Nature Reserve to the north and east. The land to the north is also common land and forms part of Mumbles Conservation Area. The site lies outside the current UDP settlement boundary and is dissected NW to SE by the AONB boundary (which follows no discernable boundary on the ground). There are around 63 caravans on site plus two car parking areas and an amenity area. The caravans are 10 month occupancy restricted (no occupancy during January and February). The proposal to be considered is the incorporation of the site within the settlement boundary.
<b>Size</b>	1.424 Ha
<b>Existing Land use</b>	Leisure – Static Caravan Park
<b>Proposed Land Use</b>	No alternative land use proposed – proposed amendment to incorporate site within settlement boundary
<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.

269 letters of objection were received which are summarised below:

- Highway safety
- Inadequate road infrastructure/site access
- Adverse impact on wildlife/natural habitat/biodiversity
- 12 month occupancy provides affordable housing
- Generates income for Council
- Supports local economy
- Adverse impact on tourism
- Adverse impact on skyline/visual amenity
- Within AONB, first AONB in British Isles
- Within Mumbles Nature Reserve
- Unacceptable precedent
- Lack of capacity in local schools
- Against current policy and Planning Inspector's previous advice
- Historically important
- Vital buffer between development and coastal paths
- Rights of Way on site
- Increased pollution
- Strain on local services e.g. doctors, water, sewerage etc.
- Flood risk/loss of soakaway
- Loss of recreational space
- Outside existing settlement boundaries
- Sewerage/drainage systems at capacity
- Detrimental effect on protected areas

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

No further representations received

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

1 letter of objection received from Mumbles Hill Caravan Park Residents Committee on the following grounds

- The proposed LDP plan changes the planning status of Mumbles Hill Caravan Park as the site, which is currently outside the settlement boundary in the UDP is proposed to be included within the settlement boundary.

The site was proposed as a candidate site for residential use and whilst it is not being designated as a residential use in the draft LDP, the inclusion of the site within the settlement boundary removes the obstacle of a future applicant having to justify building housing in open countryside.

The then occupiers of the Plunch Lane and Thistleboon Caravan Parks were relocated to enable the development of the Plunch Lane site for residential purposes with the understanding that the new Mumbles Hill site would provide a permanent alternative site. On this basis the current tenants have invested in new caravans not expecting potential eviction and redevelopment of the site.

The development of the LDP could have ensured that the current use of leisure/ tourism would be protected but consideration of the site firstly as a Candidate Residential site and subsequently as a site wholly within the settlement boundary suggests that residential development is the favoured option.

### **Response to Representations**

- No change of use is proposed – comments relate to initially proposed residential use. Now boundary amendment only.
- Given the existing use of the site as a caravan park, no biodiversity issues have been identified.

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- The caravans have 10 months permitted occupancy, not 12 months and therefore do not provide affordable housing. They are not to be used as primary residences.
- Acknowledge that the site provides income for the Council. No evidence available to indicate contribution to local economy of privately owned static holiday homes.
- Site lies partly within Gower AONB
- Site lies outside Nature Reserve
- Only site of this nature in the locality. If proposal were to proceed it could not set a precedent
- 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
- No indication of significant pollution issues at the site
- Sufficient sewerage capacity – possible water supply improvements required, however services already exist on site.
- Not a flood risk area. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- Not recreational space – only public access is along the rights of way (PROW) which would need to be incorporated within any development proposal
- Only issue to consider is whether this site which is urban in character and could not be described as open countryside should be shown on the Proposals Map as within or outside the settlement boundary. The settlement boundary is intended to distinguish between the urban and rural form.

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><i>Comments relate to any potential residential use</i></p> <p><u>Means of Access:</u> Access is available off Thistleboon Drive</p> <p><u>Local Highway Conditions:</u> There is some traffic conflict in the area due to narrow carriageways.</p> <p><u>Accessibility:</u> There is a 30 min frequency service past the site.</p>

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	<p><u>Wider Issues / Combined effect:</u> As this site already accommodates a residential use, it is unlikely to generate a significant additional traffic volume.</p> <p><u>Restrictions:</u> Number of dwelling units and resultant traffic generation should match that which currently on site.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	No issues
CCS Environmental Health	No comments.
CCS Education	No comments – no change proposed
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	No comments obtained– no change proposed
Dwr Cymru	<p><i>Comments in relation to wider proposals for Thistleboon area</i></p> <p><u>Water Supply:</u> In order to provide a water supply to these sites, extensive off-site mains (in excess of 1km) will be required.</p> <p><u>Waste:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No comments obtained– no change proposed

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Mumbles Community Council	<p><u>Preferred Strategy</u> Object to the identification of 'limited rural/urban fringe extensions' on land in the general area of Thistleboon, near Mumbles.</p> <p>Obviously at this stage in the LDP process the precise proposed allocations and designations have not yet been drafted. However, the Local Authority will already be aware of the considerable number of negative comments on these sites that have been made during the ongoing consultation on the Candidate Site Register. The Community Council, for the avoidance of doubt, advise that the site has more than 2,200 comments against development and none in support.</p> <p>The Thistleboon Area is within the Limeslade Character Area, which has "outstanding" historical landscape value and "outstanding" geological landscape value. The land is generally very accessible on foot and from local car parks (important for health and well-being as well as tourism and appreciation of the Gower and the AONB). It is a visible and distinctive part of the Local and Regional Landscape and its openness contributes to the townscape as well by providing a green lung between the areas of development. Although the character assessment topic paper does not recommend prohibiting development (it is not the tool to that), it does say that as a guideline for management, any new development must respect the traditional relationships in the area. The scale of development being suggested via the candidate site register and consequently as a possibility in the LDP far exceeds what could reasonably and realistically be accommodated in the Limeslade Character Area without causing severe and significant adverse effects on the landscape, seascape and townscape, and also visual effects on receptors such as the coast path, open land and other vantage points.</p>
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	<p>It is noted that the Transport and Access Topic Paper within the evidence base highlights that there are significant infrastructure problems associated with sites in the area, in particular that Higher Lane is substandard. Even if highway improvements can be secured as part of this area's development, there would still be substantial effects on the wider road network which is already at capacity). Moreover, there are pollution problems in parts of Mumbles that as a consequence of the volume of traffic would be further exacerbated by the quantum of development that the Preferred Strategy suggests in possible at Thistleboon. .</p> <p>Mumbles Community Council are also concerned that development of the kind being suggested would place strains on the sewage system and potentially increase the risk and likelihood of surface water flooding, which is already a local problem. It is considered that the evidence base this far does not recognise existing problems and there is therefore concern that those problems would firstly not be solved via the LDP and secondly would be accentuated if the adopted LDP followed the Preferred Strategy.</p> <p>Furthermore, there does not appear to be any consideration of the effects upon other local services and facilities. Development of these sites would need to make substantial and early contributions to upgrade sewers and schools.</p> <p><u>OY003</u> Loss of tourism facility. Residential development on this site would be visible from most directions and would intrude into the treescape skyline of Mumbles. Area of green space protection EV24 Development would be inside the boundary of the Gower AONB.</p>
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**Stage 3A: Assessment Against LDP Objectives**

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

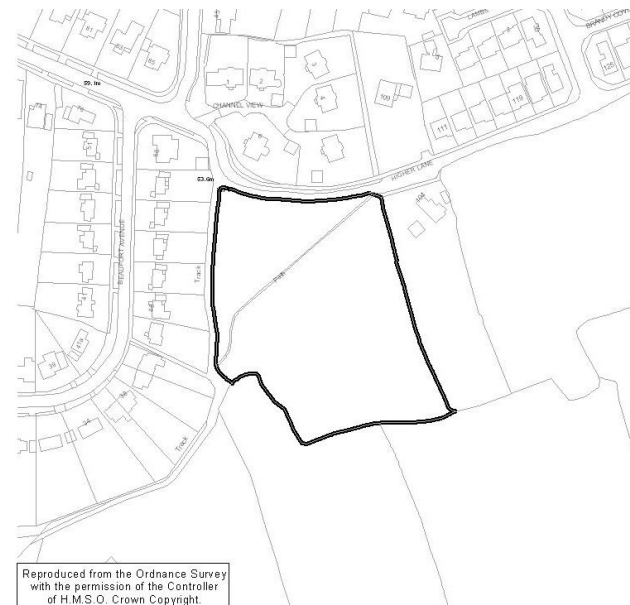
## PLANNING COMMITTEE – 11<sup>TH</sup> JUNE 2015

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

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

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<b>Reference</b>	<b>OY016</b>
<b>Name</b>	<b>Land at Higher Lane, Thistleboon</b>
<b>Description</b>	A roughly rectangular parcel of land located on the southern side of Higher Lane. Currently in agricultural use. A public footpath cuts diagonally across the site (SW-NE) and there is an access lane (not adopted) along the western boundary serving chalets further south. The site is undulating, but is generally lower lying than the adjoining land thus reducing its visibility in the wider landscape. There is a mature boundary to the western side which is a feature of the site. A single residential property with elongated rear garden lies along the eastern boundary, effectively surrounding the site by urban development on three sides. The large scale residential properties to the north are elevated above the site. The access road across the site frontage to the north is single track and acts as a traffic calming measure for the wider area. The site lies within the AONB, the boundary of which follows the existing built form.
<b>Size</b>	1.213 Ha
<b>Existing Land use</b>	Agricultural
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





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

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

2351 letters of objection were received which are summarised below:

- Development outside settlement boundary
- Within AONB
- Loss of agricultural land
- Inadequate road infrastructure/site access
- Adverse impact on tourism and local economy
- Adverse visual impact on protected areas
- Loss of green space
- Adverse impact on wildlife/habitat/ rich source of biodiversity
- Surface water drainage/ discharge to the cliff top and lower bathing beaches would be environmentally unacceptable
- Green belt
- Highway safety
- Utility supplies
- Lack of local services e.g. schools, surgeries etc./ schools at capacity
- Unacceptable precedent
- Loss of recreational space
- Urbanisation
- Contrary to current national and local policy/ AONB Management Plan/AONB Design Guide
- Site is heavily overlooked
- In close proximity to Bracelet Bay and Mumbles Hill Nature Reserve
- Poor public transport
- Negative environmental impact
- Sewerage/drainage systems exceeding capacity
- Sink holes on site
- SSSI
- Devaluation of property
- Adequate supply of houses on the market remain unsold

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- Would not provide affordable housing
- Overdevelopment/overpopulation
- Inappropriate size and scale
- Significantly important in landscape and seascape terms
- Adverse impact on vitality and viability of the area
- Erosion of cliff face by surface water run-off has already scarred the coastline
- Adverse impact on cultural heritage
- Loss of natural soakaway
- Fire hazard - when the cliffs catch on fire the field is a natural fire break
- Vital buffer zone between existing developments and coastal pathway
- Contrary to Planning Inspectors 2007 findings
- Increased noise and pollution

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

6 responses were received on similar grounds as made previously and in addition:

- Questioning the housing policy zone within which the site is identified as there are different targets for each zone
- Expressing concern over lack of site assessment

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

10 further responses received on similar grounds as made previously and in addition:

- Disputing affordable housing would be deliverable
- Querying why the Council owned site at Thistleboon has been removed and this has not
- Site forms part of a mediaeval field system
- Site has outstanding historical and geological landscape value
- Location of outstanding landscape and seascape views
- Area of tranquillity free from light pollution

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- Presence of protected species on or near to site
- Contrary to obligations of Countryside and Rights of Way (CRoW) Act 2000
- Development plans should normally only propose coastal locations for development which needs to be on the coast
- Need to protect the best and most versatile agricultural land
- Lack of evidence of need for affordable/older persons housing
- Affordable housing should be linked to those employed in agriculture or the rural economy – there is no such need at this location
- NRW and National Trust object to the development
- AONB boundary is not shown on the Proposals Map
- Development should not be encouraged at this location in advance of the LDP
- Somerset Trust the landowners would not favour affordable housing provision without it being off set as part of a much larger housing development.
- The area has seen substantial increase in property prices in recent years and the demand is for high end value housing
- It would set a precedent for development of a similar nature

### Response to Representations

- The site is located within the AONB where current national and local planning policy (UDP Policy EV18) already permits the release of land adjoining settlements as exception sites for the specific purposes of providing local needs affordable housing for those who cannot be reasonably be accommodated through the area's general housing market. National policy is not changing therefore local policy will remain unchanged through the adoption of the LDP regardless of whether or not the site is allocated for development.
- The Strategic Housing Market Assessment has identified the Gower AONB and fringe as an area where there is a need for up to 500 affordable houses, but no need for further market housing. Particular issues in this area are lack of affordable housing for first time buyers and lack of older persons accommodation (e.g. Newton Court or McCarthy and Stone type accommodation) providing local alternatives to current high proportion of under – occupied family housing
- The release of land at this location would be as an exception and not set a precedent
- 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

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- Provision of affordable housing at this location would be far more sustainable in terms of access to services/facilities than large/small rural villages further west on Gower
- The landowners are aware that only exception housing will be permitted. The site remains outside the settlement boundary to ensure this is the case and be able to resist future pressure for revised schemes for high end market housing following the grant of any planning permission for affordable/older persons housing
- There has been degradation of this part of the AONB due to close proximity to the urban form through prominence of domestic paraphernalia/outbuildings within existing adjoining rear curtilages, etc, such as Beaufort Ave to the west, which has a far greater visual impact on the AONB and coastline than this site
- Does not form part of the greenspace system this only applies to open space within defined urban settlements
- Not recreational space – only public access is along the right of way (PROW) which would need to be incorporated within any development proposal
- Not an SSSI or part of a green belt
- Devaluation of property/loss of view is not a material planning consideration
- No impact on Bracelet Bay or Mumbles Hill Nature Reserve
- Not visible from sea/coastal path. Coastal locations directly abut the coast – this site does not.
- Less prominent location than proposed candidate sites further east which occupy ridgeline locations. Impact on the landscape will be an important factor in determining the suitability of any future development proposals
- All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- Existing adjoining residential development already extends further south/ is more prominent than this contained site
- Frequent (2 /hr) bus service within 200 metres of the site
- Local highway improvements required ( which could be funded through development) but should be a low traffic generating scheme – older persons accommodation would be most suitable
- Sufficient sewerage capacity – water supply improvements required
- Habitats survey required but no fundamental constraints identified at this stage
- No objection from LEA. Ageing population profile and limited opportunities for new build housing/ under occupation of housing by increasingly elderly population will likely see a reduction in demand for school places
- Noise during construction is not a material planning consideration and development will not cause pollution
- Insufficient information to be able to judge density and scale – this is a matter for planning application stage. Any development would need to be in keeping with context of adjoining development
- Site not appropriate for tourist use

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- No indication loss of grade 3 land would impact on viability of a wider agricultural holding. New development would add to vitality/viability of existing settlement particularly if it enabled families to move into currently under-occupied homes vacated by older persons
- This site is completely unrelated to the existing caravan site at Thistleboon which is proposed to be incorporated within the settlement boundary and remains a potential future development site

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site could be accessed from Higher Lane.</p> <p><u>Local Highway Conditions:</u> Substandard highway near the site (Higher Lane)</p> <p><u>Accessibility:</u> There is a 30 min frequency service 175m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Any development will require local highway improvements.</p> <p><u>Restrictions:</u> Significant traffic generating uses would not be acceptable. Highway improvements 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.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site could contain semi-natural grassland and potentially important Hedgerows protected under the Hedgerow Regulations (1997). An extended phase1 habitat survey and hedgerow assessment would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey.</p>
CCS Environmental Health	No comments.
CCS Education	<p><u>Oystermouth Primary:</u> Developments in the Oystermouth area will exceed capacity at this school. Oystermouth Primary is on an extremely restricted site (half of which is owned by the Duke of Beaufort). There is little scope to expand the school. Access to the site is poor as it is within the retail area. Previous consideration has been given to a rebuild on a greenfield site that could be more central to residential areas.</p>

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	<p><u>Bishop Gore Comprehensive</u>: All developments proposed in the catchment for Bishop Gore would far exceed its capacity. Investment would be required to accommodate increase in pupil numbers</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>The site will drain to Clyne which has a 'poor' Water Framework Directive. Furthermore the site will be required to discharge all foul water to main sewer at Swansea Bay STW given the site is on a major aquifer.</p> <p><u>Comments on Draft Proposals Map: Outside sewer catchment:</u> The site is within the Gower AONB, therefore we advise consulting your Authority's AONB Team and refer you to the AONB Design Guidelines. A PRoW crosses the centre of the site. Mature hedgerows boarder the site. Grassland may be of BAP habitat value. The Llangland Bay SSSI is located approximately 300 metres to the south-west of the site. Bat species are recorded within the area and may utilise the boundary hedgerows as flight lines/foraging.</p> <p>WFD Poor (Clyne).</p> <p>Major aquifer- sewer connection needed.</p>
Dwr Cymru	<p><u>Water Supply:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> In order to provide a water supply to these sites, extensive off-site mains (in excess of 1km) will be required.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

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	<p><i>Note: General comment for all candidate sites in area Water supply figure quoted relates to serving the proposed more remote candidate site nearby which would require extensive extensions to link with existing network. Assumed connection available for this site from adjoining highway - further site specific comments required at Stage 3 but would not be a significant constraint to development.</i></p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Mumbles Community Council	<p><u>Preferred Strategy</u> Object to the identification of 'limited rural/urban fringe extensions' on land in the general area of Thistleboon, near Mumbles.</p> <p>Obviously at this stage in the LDP process the precise proposed allocations and designations have not yet been drafted. However, the Local Authority will already be aware of the considerable number of negative comments on these sites that have been made during the ongoing consultation on the Candidate Site Register. The Community Council, for the avoidance of doubt, advise that the site has more than 2,200 comments against development and none in support.</p> <p>Notwithstanding the weight of public opinion, there is evidence to support our position that the site should be allocated for residential development.</p> <p>There are various sites also contained within the Candidate Site Register in the vicinity of Higher Lane. This entire area forms part of the countryside (it is formally within the Area of Outstanding Natural Beauty) that divides Limeslade and Thistleboon in the east from the Beaufort Avenue area in the west. It would extend the built environment towards the coast. Greenfield development within this part of the AONB ought to be severely restricted.</p>

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This is supported by the Gower Landscape Character Assessment Topic Paper. The Thistleboon Area is within the Limeslade Character Area, which has "outstanding" historical landscape value and "outstanding" geological landscape value. The land is generally very accessible on foot and from local car parks (important for health and well-being as well as tourism and appreciation of the Gower and the AONB). It is a visible and distinctive part of the Local and Regional Landscape and its openness contributes to the townscape as well by providing a green lung between the areas of development. Although the character assessment topic paper does not recommend prohibiting development (it is not the tool to that), it does say that as a guideline for management, any new development must respect the traditional relationships in the area. The scale of development being suggested via the candidate site register and consequently as a possibility in the LDP far exceeds what could reasonably and realistically be accommodated in the Limeslade Character Area without causing severe and significant adverse effects on the landscape, seascape and townscape, and also visual effects on receptors such as the coast path, open land and other vantage points.

It is noted that the Transport and Access Topic Paper within the evidence base highlights that there are significant infrastructure problems associated with sites in the area, in particular that Higher Lane is substandard. Even if highway improvements can be secured as part of this area's development, there would still be substantial effects on the wider road network which is already at capacity). Moreover, there are pollution problems in parts of Mumbles that as a consequence of the volume of traffic would be further exacerbated by the quantum of development that the Preferred Strategy suggests in possible at Thistleboon. Moreover, it is considered that the sort of highway improvements that would pragmatically be required in order to deliver development at Higher Lane would be completely out-of-character with the surrounding built and natural environments. Improvements to enable access to the Candidate Site would likely and consequently lead to further increases of traffic movements between Mumbles Road and Langland/Caswell/Newton, via the Headland, Bracelet Bay, Limeslade Bay and Higher Lane. This would hence be detrimental to the existing area, conflict with the movements associated with the new development and further affect the character, appearance and amenity of this sensitive local area.



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Mumbles Community Council are also concerned that development of the kind being suggested would place strains on the sewage system and potentially increase the risk and likelihood of surface water flooding, which is already a local problem. It is considered that the evidence base this far does not recognise existing problems and there is therefore concern that those problems would firstly not be solved via the LDP and secondly would be accentuated if the adopted LDP followed the Preferred Strategy.

Furthermore, there does not appear to be any consideration of the effects upon other local services and facilities. Development of these sites would need to make substantial and early contributions to upgrade sewers and schools.

### OY016

Higher Lane is narrow with a major pinch point close to existing junctions. The northern boundary to the site is formed by fairly dense vegetation along the southern side of the highway. The western boundary of the site is formed by trees and other vegetation separate the site from a well-used right of way (the right of way leads south down to the cliff tops and connects with the Wales Coastal Path). Beyond the right of way are the rear gardens of properties located on Beaufort Avenue. Trees and vegetation form the southern boundary of the site. The eastern boundary is also treed, beyond which lies a large detached property with very long rear garden. The site is roughly quadrilateral, albeit the south-western corner kinks to avoid a clump of trees. It is greenfield but does not appear to be in use at present, although the grassland is clearly managed. A footpath crosses the site from north-east to south-west.

The site is located on the edge of Thistleboon, which is part of the Mumbles area. Thistleboon roughly encompasses an area in an elevated position between Limeslade Bay to the east, Langland Bay to the west and Oystermouth to the north. There are sea views from a myriad of locations in Thistleboon, due in part to its prominent and exposed position on the southern side of Mumbles Hill. Consequently it is characterised by large residential properties, especially in areas that are afforded sea views.

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Thistleboon, indeed most of the Mumbles area, is characterised by sloping topography. Higher Lane zigzags west-east, from the complicated junction of Overland Road / Langland Road / Clifflands Close / Southward Lane / Langland Bay Road / Rotherslade Road to Plunch Lane, which in turn heads east through Limeslade Bay and Bracelet Bay to connect with Mumbles Road at the end of the headland. Although Thistleboon Road provides a connection with the Mumbles Road cutting down Mumbles Hill, all routes to the Swansea Bay frontage are either indirect or very steep.

The proposed allocation forms part of a larger area of fields that were all promoted as candidate sites by the landowner(s). The fields slope gradually downhill to the south, towards the coastline (which in this location is a series of cliffs with views to Langland Bay and the Gower in the east).

Footpaths cross the cliffs to the south and connect to Thistleboon via the path that forms the proposed development site's western boundary and by a path that connects with Plunch Lane adjacent to Mumbles Cricket Club.

This wedge of open greenfield land between Plunch Lane and Beaufort Avenue provides an important part of the context of Thistleboon. It is mentioned specifically in the Ward Profile (part of the LDP evidence base as being natural and semi-natural green space). It provides a buffer of AONB land between the urban built form and the coastline. It is therefore valuable as a landscape asset in its own right as well as within the wider setting of the coastline, the AONB and Mumbles head. The site is visible from a footpath closer to the coastline and the site is set within an open landscape setting.

Compared with the majority of the Mumbles area, Thistleboon has very few community facilities. Indeed, as shown on the LDP Ward Profile for Oystermouth (May 2013), only bus stops and the private cricket club are within 500m of the proposed site. Nor are there convenient or easy direct routes for pedestrians or cyclists to reach shops or services elsewhere in Oystermouth / Mumbles. The aforementioned bus stops are served by an hourly service from Swansea bus station to Limeslade / Bracelet Bay via Oystermouth and Langland.

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The site currently has a field access in the north-eastern corner. However this is only a gate (and also the location of the footpath) and there is no evidence available to demonstrate that this can be improved to an acceptable standard. A search of the LPA's online register shows no recent planning applications affecting this site. It is worthwhile mentioning the site's status within the extant UDP: it is outside of the settlement boundary and within the Area of Outstanding Natural Beauty.

During the consultation period on the LDP Preferred Strategy objections were lodged against the possibility of a 'limited rural / urban fringe' extension involving a series of five candidate sites in the Thistleboon area. It was pointed out that the area of countryside around Higher Lane was formally part of the AONB. Reference was made to the Gower Landscape Character Assessment Topic Paper:-

*"This is supported by the Gower landscape character assessment topic paper. The Thistleboon area is within the Limeslade character area, which has "outstanding" historical landscape value and "outstanding" geological landscape value. The land is generally very accessible on foot and from local car parks (important for health and well-being as well as tourism and appreciation of the Gower and the AONB). It is a visible and distinctive part of the local and regional landscape and its openness contributes to the townscape as well by providing a green lung between areas of development. Although the character assessment topic paper does not recommend prohibiting development (it is not the tool to do that), it does say that as a guideline for management, any new development must respect the traditional relationships in the area. The scale of development being suggested via the candidate site register and consequently as a possibility in the LDP far exceeds what could reasonably and realistically be accommodated in the Limeslade character area without causing severe and significant adverse effects on the landscape, seascape and townscape, and also visual effects on receptors such as the coast path, open land and other vantage points."*

The objections also pointed out concerns about highways, transport and access. The topic paper at the time also referred to the pollution problems prevalent in parts of Mumbles that would likely be exacerbated by additional car movements. Reference was also made to flood risk and to the lack of consideration of the need for infrastructure and services, e.g. schools and sewers.

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It is noted that according to the report to Committee (December 2014) this site is allocated for "primarily local needs / affordable housing", with an identified capacity of 30 dwellings. The evidence base for the LDP indicates that Mumbles as a whole experiences traffic problems. These tend to be severest closer to Oystermouth and along Mumbles Road, but that does not mean that other parts of the area don't have their own problems. The biggest constraint to development at Thistleboon in regard to highways is the fact that Higher Lane is severely substandard. The road has two dog legs at the north-western corner of the site with very limited visibility and an extremely narrow pinch point. Nonetheless the road is used by large vehicles and does not appear to have any restriction on use. There is no pedestrian path on the southern side (adjacent to the proposed development site) and on the northern side the path is rough and unmade. The access issue is not helped by other junctions in close proximity to this pinch point, the existence of a large gated community (Channel View) with egress onto Higher Lane immediately adjacent to its junction with Cambridge Road. Moreover the property opposite Channel View has large close-board boundary fences (and a gated driveway) that further restricts visibility

At the other corner of the site, the existing field access is a gate and kissing gate. This is also constrained in terms of visibility and conflict with pedestrians (users of the pavement on the southern side of Higher Lane have to cross the road here to join the unmade track on the northern side) and users of the PROW. If improvements are possible (there is no evidence available that they are), then it will likely involve the loss of significant amount of roadside vegetation within an AONB location.

A public right of way crosses the site. It is acknowledged that appropriate design methods could retain this right of way as part of a development and is not therefore an automatic obstacle to planning permission being granted, however it may need to be diverted or closed. Furthermore, the potential impact upon users of the right of way from a housing development would be significant and adverse. Both this right of way and the track that leads down the western boundary are rural in feel, despite the presence of housing to the west (Beaufort Avenue). The rural character is reinforced by the tunnel of trees that the track leads through. Development of this candidate site would likely adversely affect the character of this right of way and affect the amenity of users of it, by introducing urban development to the eastern side as well as the western.

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Thistleboon does seem to have a shortfall in community facilities, particularly in locations easily accessible from Higher Lane. It is acknowledged that there is an hourly bus services, but the site does not really lend itself to trips on foot or bicycle to the services and facilities located on Mumbles Road or Newton Road. Although the bus service will help reduce the reliance on private car there will inevitably be an increase in car journeys if this site was developed - further accentuating the traffic problems in Mumbles. Furthermore 30 dwellings in this location are unlikely to incorporate new facilities as part of the development, apart possibly from public open space.

At present the LDP evidence base is lacking information on infrastructure and services, however it is appreciated that the current consultation is not the formal deposit stage. It is hoped that the deposit LDP is accompanied by a far more robust evidence base and also by the full SEA/SA and HRA. The local responses to the candidate site show there is considerable concern about the adequacy of the local infrastructure to accommodate an additional 30 properties. However what is evident from the Physical Infrastructure Topic Paper is that to service the candidate sites in Oystermouth, off-site water supply mains in excess of 1km will be required.

A review of the available evidence on housing land and supply as part of the LDP does not reveal the full reasoning for new housing sites on greenfields in the Mumbles area. We reserve the right to comment on this in detail once the deposit LDP and its accompanying evidence base are published later in 2015.

Under the LANDMAP assessment, the area around Thistleboon is attributed the following evaluation:-

- Landscape habitat - low (Mumbles)
- Historic landscape - outstanding (Gower subboscus agricultural)
- Cultural landscape - high (Mumbles, Newton etc)
- Geological landscape - n/a
- Visual and sensory - n/a

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Although LANDMAP does not include this area within a geological landscape or visual and sensory aspect area, the Thistleboon area is included within the Limeslade LCA (as set out in the Gower Landscape Character Assessment). The LCA is predominantly covered by an outstanding geological landscape aspect area (aspect area 023) and two high visual and sensory aspect areas (nos. 105 and 541). The Limeslade LCA is described in the Gower landscape character assessment as being an exposed area of common land enclosed between the urban edge and the indented coastal cliffs. It confirms that there are "attractive panoramic coastal views both into and out of the area, with a few detracting elements, such as car parks, unsympathetic built form of both residential and leisure facilities and communication masts."

Amongst the management guidelines set out in the LCA are that the distinctive cliff top character of the open access common land should be maintained and that any development must respect the traditional relationship of buildings to the setting. One of the weaknesses of the LCA is given as its vulnerability to incongruous building developments. Although the LANDMAP system and the Gower Assessment both give detailed assessment of the landscape, it is important to also consider the landscape - and visual effects - in other ways. For example the fields at Thistleboon do serve as an area of open land that softens the edge of the built-up area and that bring a sense of rurality and tranquillity to the urban edge. Moreover, they act as a buffer between the incredibly sensitive coastline and the urban area. By virtue of being surrounded - and crossed - by rights of way there is also a perception of the land as being a vital part of the open and exposed coastal zone by people enjoying the countryside.

There are no environmental designations affecting the site, but that does not necessarily mean it is developable in principle. The site is greenfield and has mature conservation assets along its boundaries. There is certainly potential for other features of nature conservation interest to be present, in particular habitats.

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In terms of flood risk, the site is outside of any flood zone as shown on the TAN15 Development Advice Maps. However the environment agency interactive maps show that some of the site is at risk from surface water flooding .It is apparent that the site drains to the coastline, which could lead to an increased risk of pollution were the site to be developed. We understand that the entire undeveloped area of Thistleboon is subject to subsidence. There are Roman mines in the area that are lead underground from the cliffs into the land beneath the site. There are also sinkholes in the area and collapsed caves under the Thistleboon area, including in the location of surface water flood risk. Indeed we are advised that much of the local area is characterised by fissures, active sinks and collapsed cave chambers.

Although there is information within the LDP evidence base about the candidate sites that have failed the LPA's Stage One and Stage Two assessments, there is little information available about how and why the LPA have identified potential allocations on their Draft Proposals Map. As such, there is little understanding at this stage as to why the LPA have earmarked this candidate site for allocation. We reserve our right to examine in detail the evidence base, including the HRA and SEA / SA, supporting the forthcoming Deposit LDP and to make further representations on this site at that time.

It is noted that the report to Committee (December 2014) says that where any proposed allocation does not get carried forward to the Deposit LDP, compensatory alternative provision will be sought within the same Strategic Housing Zone. This in itself needs fully justifying, as it is not inconceivable that more sustainable sites in a different housing zone should be preferred to sites in the west zone (i.e. Mumbles and Sketty) that have already failed to be allocated. We note that there are more than 2,300 comments on this site within the Candidate Site Register. Most of these are objections. Although the volume of objections is not the main consideration for the LPA, many of the objections contain valid content, much of which is included within this report.

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	<p>From the above appraisal of the site, it is evident that there are significant flaws in the proposed allocation of this site. Most obviously, it will result in around 30 dwellings being built on land within the defined AONB. Even if the site was outside of the AONB, it clearly is part of a significant landscape area that serves an important purpose in dividing the urban edge of Swansea from the sensitive coastal area between Limeslade Bay and Langland Bay.</p> <p>This encroachment of urban form towards the coastline across valued open land would also likely have an effect upon users' enjoyment of the open access land and of the rights of way that are within and near to the candidate site. There would be associated visual effects upon local residents as well as members of the public on the public rights of way.</p> <p>Parts of the site also appear to be at risk of flood from surface water run-off, a fact that would be amplified by the introduction of built development to a currently greenfield site; the increased risk of pollution along the run-off to the sea is also a noteworthy issue. Moreover, there are potentially ground conditions that could have a considerable effect on any development of this site, and indeed in turn could be accentuated by development taking place.</p> <p>There is also considered to be a fair chance of ecological constraints to the site, albeit no formal assessment has been undertaken in this regard. Another significant issue affecting this site is the access problem and related transport and highway issues. Development of around 30 houses would continue to add to the traffic problems within Mumbles, particularly because there is no route to the site that avoids complex junctions, pinch points, steep hills or Mumbles Road. Although an hourly bus service does pass the site, it is inevitable that there will be an increase in the use of private car as a consequence of the development, especially due to the relative inaccessibility of community facilities and shops from the site by foot or by bicycle. The highway network in the immediate vicinity of the site is also extremely substandard. Substantial works would be required to improve this, which even if they could be achieved, would likely be at the expense of residential amenity and ecological / landscape features.</p>
	<p>As this consultation only relates to the draft Proposals Map, this site has not been assessed fully by the LPA and there is not a complete evidence base to analyse. However there are significant</p>



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	<p>concerns about the impacts that would arise from the allocation and development of the site for housing, especially considering its location within the AONB and on a constrained highway and its context and relationship with the urban form of Mumbles and the coastal area to the south. Without prejudicing any representations required at the deposit stage, we consider that the allocation of this site would fail the following tests of soundness:-</p> <ul style="list-style-type: none"> <li>• C1 - the land use plan does not have sufficient regard to the Gower Landscape Character Assessment</li> <li>• C2 - the plan does not have necessary regard to national policy insofar as a greenfield site which is in the AONB and which has significant landscape value is proposed to be allocated</li> <li>• CE1 - no logical strategy would allow for an area of AONB to be allocated for housing</li> <li>• CE2 - no robust or credible evidence base would allow for an area of AONB land to be allocated for housing</li> </ul> <p>It is concluded that on the basis of the currently available evidence this allocation would render the LDP unsound and as such we object to the proposed allocation.</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	n/a	0	n/a	?	-1	?	+1	n/a	n/a	n/a	n/a	+2	n/a	n/a	-1	-2	-2	-1	n/a	?	+1	+2

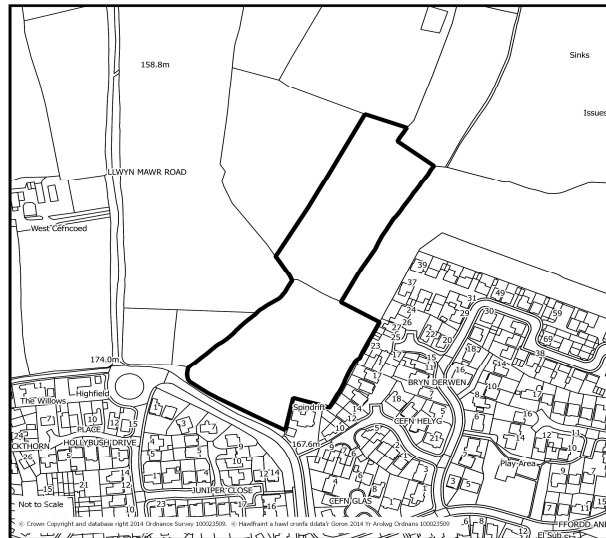
### Stage 3B: Assessment Against SEA/SA Objectives

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

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<b>Reference</b>	<b>SK011</b>
<b>Name</b>	<b>Land to the North of Llwyn Mawr Road, Tycoch</b>
<b>Description</b>	Two parcels of pasture land gently sloping west to east set below southern side of ridgeline, bounded for most part by established hedgerow and mature trees. The site has been expanded since the original submission to include the two adjoining field parcels to the north (only the western field relates to this submission - the eastern field forms part of the hospital land). These fields would provide a vehicular connection through to the Cefn Coed hospital development to the east (SK017 refers). If the Cefn Coed proposal were not to proceed or the link not be agreed as part of site SK017 then only the southern most field of SK011 would be proposed for inclusion in the LDP – as originally submitted
<b>Size</b>	1.01 Ha
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)

Amended boundary – as shown for Dec 14 Proposals Map consultation



Original site area



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

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

7 letters of objection were received which are summarised below:

- Loss of agricultural land
- Increased traffic on inadequate over congested roads
- Highway safety
- Increased pressure on local services e.g. schools, doctors etc.
- Adverse impact wildlife/habitat
- Local schools at capacity
- Overdevelopment

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

No comments were received specifically regarding this site.

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

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

1 letter for support from site promoters:

- supporting an extended site boundary along with land directly to the east

## Response to Comments

- 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
- Highways safety ( and air pollution due to congestion) is an existing issue and the proposal is being brought forward in connection with the adjoining site to the west (SK017) to attempt to address these current issues by providing a link through to Cockett Road
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. In West Swansea an ageing population profile and limited opportunities for new build housing/ under occupation of housing by increasingly elderly population will likely see a reduction in demand for school places from within existing catchments
- 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

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- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- The impact of development 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.

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Site can be accessed from Llwyn Mawr Road.</p> <p><u>Local Highway Conditions:</u> Traffic congestion issues in the area, particularly at the school site on Llwyn Mawr Road. Also concern with levels of traffic along Gower Road corridor and subsequent Air Quality issues at Sketty cross. Lack of footway at the site frontage.</p> <p><u>Accessibility:</u> There is a 60 min frequency service 150m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Combined affect of additional traffic in the area will need to address issues of road congestion and air quality.</p> <p><u>Restrictions:</u> The acceptability of additional traffic in this area is yet to be determined. Concern with highway congestion and air quality are material. The site may only be suitable for small scale development.</p> <p><u>Transport Proposals:</u> Traffic reduction and air quality improvements 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.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>

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CCS Biodiversity	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.
CCS Environmental Health	No comments
CCS Education	<p><u>Sketty Primary:</u> There is no capacity to accommodate increased numbers from these sites. Therefore consideration would have to be given to a new primary school being incorporated as part of SK017 as that site alone could generate nearly 180 primary pupils.</p> <p><u>Olchfa Secondary:</u> Has very little surplus capacity - Developments in the catchment area would require significant investment to the school to enable any increase in pupil numbers</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Appears to be within the sewer catchment, but we advise to check with DCWW in relation to availability of the system.</p> <p>Boundaries and hedgerows should be retained and where possible enhanced. WFD Moderate</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Sewerage:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development.</p>

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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 Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. There are incidents of flooding downstream of this site, however there is scheme in place within DCWW's current AMP Programme to resolve. Potential developers can either wait for the scheme to resolve this issue or alternatively can progress the site through the sewerage requisition provisions of the Water Industry Act 1991 or Section 106 of the Town &amp; Country Planning Act 1990.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity
Coal Authority	No coal mining legacy features identified by the Coal Authority.

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

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

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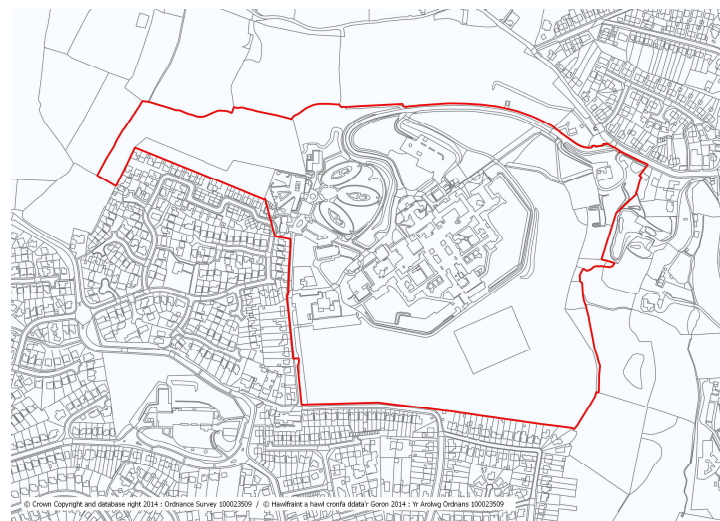
### Stage 3B: Assessment Against SEA/SA Objectives

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



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<b>Reference</b>	<b>SK017</b>
<b>Name</b>	<b>Cefn Coed Hospital, Waunarwydd Rd, Swansea</b>
<b>Description</b>	Cefn Coed was purpose built as a mental health hospital in the 1930's. NHS use of the site is being scaled back with only 2.9ha retained for health care uses and the Swansea Psychiatry Education Centre. 11.8 ha of land on the ridgeline to the north of the hospital are subject to a legal agreement relating to use for recreation, open space, landscape and wildlife conservation purposes only. The remaining 20 acres, which includes the original hospital building, is surplus to requirements and proposed for residential use for up to 575 dwellings. The site has potential to expand to the west via a link road to the top of Llwyn Mawr Rd, Tycoch (to join with Candidate site SK011) and increase the overall capacity for the combined sites to @600units. The site is currently allocated in the adopted UDP for mixed use including 200 dwellings. An outline application for the first phase of development (up to 73 dwellings) to the south of the site served off Lon Masarn has recently been approved subject to s106 agreement.
<b>Size</b>	34.923 Ha
<b>Existing Land use</b>	Health Care Facilities
<b>Proposed Land Use</b>	Mixed Use Health Care and 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.

42 letters of objection were received which are summarised below:

- Loss of green space
- Adverse visual impact
- Adverse impact on wildlife/habitat
- Increased traffic on inappropriate narrow residential roads
- Adverse impact on existing surrounding properties
- Adverse impact on surface water drainage/flood risk
- Contrary to current policy
- Increased pressure on local services e.g. schools, doctors etc.
- Green belt
- Rights of way on site
- Loss of recreational space
- Lack of capacity in local schools
- Waunarwydd Road should be retained as it is a historic part of Cockett and Sketty

2 letters of comment were received which are summarised below:

- Need to clarify 'mixed use', could it be residential/commercial?
- Land ownership does not permit Waunarwydd Road to be upgraded sufficiently to accommodate such a large development area
- A substantial green wedge is required along Waunarwydd Road to prevent ribbon development, and to protect wildlife and fauna.

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

No comments were received specifically regarding this site.

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

1 representation of support as summarised below:

- Re-provision of services will make surplus land at site suitable for development
- Land disposals aid reduction in expenditure managing surplus estate and allow continued investment in modern health care facilities
- ABMU support the allocation of 575 residential units and considers that this is reasonable and realistic having regard to:
  - (a) ABMU's own detailed assessment of the capacity of the site to accommodate residential development; and
  - (b) ABMU's investment and land disposal programme.

### **Response to representations**

- Site is already allocated for development in the current UDP. It is not green belt or part of the greenspace system. The mixed uses proposed are health care and residential as per UDP however there is a greater density of residential development proposed
- A small portion of the NW part of the site falls within the currently designated green wedge. Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- Green wedges unlike Green Belts are only temporary in nature and around 40% the new housing to be allocated in the LDP will have to be on land currently designated as green wedge, as there is insufficient land available within existing settlement boundaries to meet all future demand. Each site is looked at on its individual merits and does not set a precedent as all policy is being considered anew.
- There is no public recreational space currently available on site
- There will need to be recreational/open space provision within the proposed development or nearby. Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development

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- Traffic impact is key to the development of this site. Highway improvements to reduce congestion and improve air quality would be required. To this effect a proposed link through the site to the top of Llwyn Mawr Rd Tycoch is proposed in conjunction with the development of the adjoining candidate site to the west. The link road safeguards the existing single track Waunarlwydd Rd. Strategic Highway Network Modelling is currently being carried out to determine the impact of the proposals and link road benefits.
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for the site and the proposals brought forward.
- Appropriate ecological surveys have been or are being carried out and necessary mitigation measures will need to be put in place to protect wildlife/habitats
- 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
- Surface water flooding issues will need to be addressed /are being addressed as part of current planning application and future phases of development. 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
- Rights of Way across the site will need to be retained and pedestrian connections to the wider community improved as appropriate
- The capacity of local schools is a key consideration and any development proposals will need to make a significant financial contribution to existing or new school sites. The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.

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- The 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.
- Land beyond the site (as amended) extending along Waunarwydd Rd has been identified for protection as a Special Landscape Area

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Site can be accessed from Waunarwydd Road as currently.</p> <p><u>Local Highway Conditions:</u> Some traffic congestion issues at peak hours along Cockett Road. Additional traffic may impact on Air Quality issues at Sketty cross.</p> <p><u>Accessibility:</u> There is a 60 min frequency service 200m from the site.</p> <p><u>Wider Issues / Combined effect:</u> Combined affect of additional traffic in the area will need to address issues of road congestion and the affect on Air Quality at Sketty.</p> <p><u>Restrictions:</u> A Transport Assessment has been submitted indicating a development of between 200 houses and 450 houses. The lower figure has less impact on local road conditions and it may be necessary to restrict the overall number of units.</p> <p><u>Transport Proposals:</u> Congestion reduction and improvements to Air Quality required.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>

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CCS Biodiversity	<p>This site contains Lowland Mixed Deciduous Woodland and may contain; semi-natural grassland, scrub and bracken of SINC habitat importance. Lowland Mixed Deciduous Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p> <p>An extended phase1 habitat survey would need to be undertaken to determine the habitat classifications, species lists and for the presence of protected species. Important features highlighted may require further survey.</p>
CCS Environmental Health	<p>Air quality issues identified within neighbouring areas in Fforestfach and Sketty – possible opportunity to introduce measures to take pressure off Sketty</p>
CCS Education	<p><u>Sketty Primary</u>: There is no capacity to accommodate increased numbers from these sites. Therefore consideration would have to be given to a new primary school being incorporated as part of SK017 as that site alone could generate nearly 180 primary pupils.</p> <p><u>Olchfa Comprehensive</u>: Very little surplus capacity - Developments in the catchment area would require significant investment to the school to enable any increase in pupil numbers</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>European Protected Species (EPS) - Bats known to be present. Any demolition or alterations of buildings at the site will require appropriate levels of bat surveys / assessments. Hedgerows and boundaries at the site must be retained in order to provide connectivity. Known Bat Roosts within the site boundary.</p> <p>WFD Moderate. Possible contamination due to previous use.</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>Sewerage:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> DCWW has records of isolated incidents of flooding in this ward and dependant on the location of the confirmed sites, these flooding issues would need to be resolved to promote the development.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required. The site is crossed by a number of public sewers for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth no objection to P/A 2014/0969 subject to standard conditions

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

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

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

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



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<b>Reference</b>	<b>WC004</b>
<b>Name</b>	<b>Land off Chestnut Avenue, Clyne Common, West Cross</b>
<b>Description</b>	Common land to north side of Chestnut Ave. Part of a larger lung of common land/open countryside/green wedge between Bishopston, West Cross and Mayals which was originally proposed as a Candidate site (WC004a refers). This open land continues as finger of greenspace (Washingbrook) through West Cross to the foreshore. A no. of public footpaths cross the site. The land rises up from east to west and from south to north. The boundaries of the site do not follow any physical features on the ground.
<b>Size</b>	1.9Ha
<b>Existing Land use</b>	Common Land
<b>Proposed Land Use</b>	Residential - affordable housing
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



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

**Original proposal:**

114 objections received which can be summarised as follows:

- Common land
- Loss of green space/intrusion into the green wedge/ part of the green belt
- Adverse impact on wildlife/habitat
- Forms a green lung on the edge of a large housing estate
- Ribbon development straddling the gateway to Gower
- Should be purchased by the Council to secure for future generations
- Highway safety
- Valuable amenity
- Contrary to current UDP policy
- Coalescence of communities
- Within AONB
- Devaluation of property
- Loss of privacy
- Adverse impact on tourism and local economy
- SINC
- Local schools oversubscribed
- Loss of agricultural/grazing land
- Insufficient drainage system/flood risk
- Limited public transport
- Extinguishing public rights of way
- Adverse visual impact
- Lack of viable infrastructure/ strain on services e.g. schools etc.
- Important part of local landscape
- Historic landscape
- Applicant not sole owner of land

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- Loss of well-used recreational space
- Whitestone School has access and road safety problems
- Applications previously refused

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

1 representation received

- The Preferred Strategy identifies the necessity to provide for 16,700 new dwellings over the period 2010-25, of which, between 4,800 - 5,900 dwellings to be delivered on Greenfield sites. The West SHPZ has been identified to deliver 1,660 new homes over the Plan period. Necessary to develop sites such as this one for housing to achieve these figures. Clyne Common promoted as a residential extension to the settlement or for small scale rounding off. Entire site submitted for consideration. Alternatively smaller part of site also discussed with LDP team. Phase 1 Habitat Survey undertaken and site considered developable, subject to suitable mitigation and compensatory measures being put into place, which our client will adhere to. The site is allocated as Common Land but this is not necessarily a constraint to development as the Trust is open to providing suitable compensatory measures and/or exchanging land. The site is appropriate for development and our client considers that it should be included in the LDP. Our client is willing to work in partnership with the council to bring forward the sites.

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

1x72 signature petition of objection received on the following grounds

- Support for previous submissions aimed at protecting the environment of Clyne Common
- Clyne Common is an AONB and should be registered accordingly
- It would destroy the existing panoramic landscapes and seascape
- Walkers on Clyne Common are not allowed to destroy protected flora why should the Council
- The site encroaches onto a well used public footpath
- The loss of vegetation may impair air quality and reduce the carbon footprint of the area

4 additional letters of objection received:

- Site is within or adjacent to an ancient woodland

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- Query the suitability of the site for elderly persons given half hourly bus service
- Devaluation of properties opposite

### Response to Representations

- Development of whole site would be completely unacceptable; however a small portion could be released as an exception to national and local policy to provide local needs affordable housing. The wider site forms a key landscape role at the gateway to Gower and provides an important buffer between the urban settlement edge and the Gower Fringe/AONB
- Compensatory common/grazing land/recreational space would need to be provided within the locality to mitigate any loss.
- Site is not in the AONB and there are no greenbelts within the County
- Existing UDP policy which designated the land as green wedge must be reviewed as part of the LDP preparation process.
- The Strategic Housing Market Assessment has identified the Gower AONB and Fringe as an area where there is a need for up to 500 affordable houses, but no need for further market housing. Particular issues in this area are lack of affordable housing for first time buyers and lack of older person's accommodation. Such development should have no impact on tourism and have a positive impact on the local economy by enabling people to stay in their local communities who would not otherwise be able to afford market housing.
- Current national and local planning policy (UDP Policy EV18) already permits the release of land adjoining Gower AONB/Fringe settlements as exception sites for the specific purposes of providing local needs affordable housing for those who cannot be reasonably be accommodated through the area's general housing market. National policy is not changing therefore local policy will remain unchanged through the adoption of the LDP regardless of whether or not a specific site is allocated for development. The release of land for such purposes would be an exception and not set a precedent
- There have been no previous applications of this nature
- No highways objection to a small scale scheme served from Chestnut Ave where public transport is high frequency
- It is an area that contains priority habitats and detailed ecological surveys would be required of any proposed development area and the potential to relocate species/habitats assessed
- Any public rights of way crossing the site would need to be retained/accommodated
- There is no prospect of the Council purchasing the land which is entirely owned by the Somerset Trust
- Devaluation of property is subjective and not a material planning consideration

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- Any scheme would be required to comply with adopted design guidance to ensure no loss of privacy/amenity and to minimise visual impact in the landscape
- There is no issue with local infrastructure provision/capacity
- Proposal would have no impact on Whitestone School which has surplus school places. There are capacity issues at Bishop Gore Comp which would need to be addressed
- Greenfield run off would need to be achieved and any existing surface water flooding problems addressed

### Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: The suggested frontage development of Chestnut Avenue is acceptable in principle.</p> <p><u>Local Highway Conditions</u>: Footway missing along Chestnut Avenue</p> <p><u>Accessibility</u>: There is a 20 min bus frequency past the site frontage along Chestnut Avenue</p> <p><u>Wider Issues / Combined effect</u>: Unlikely that a small scale development will generate any traffic issues.</p> <p><u>Restrictions</u>: Assuming frontage development only, no technical appraisal would be necessary. In the event that a larger site area needs to be considered this may require formal Transport Assessment. Development would need to include provision of a footway along Chestnut Avenue.</p> <p><u>Transport Proposals</u>: No planned improvements in the area.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period. No objection, but would prefer a mix of affordable and market housing rather than just 100% affordable housing</p>

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CCS Biodiversity	All three areas fall within the Clyne Common SINC and are all priority habitats. Apart from the triangle the areas are all registered common. In addition the larger area appears to contain an area of Ancient Woodland (there is a presumption against developing these); this would need confirming by looking at the Tithe maps. The small triangle appears to be separated from the common by a low bank which suggests this may have been part of a field at some point, the tithe maps might help with this. There is priority habitat in all of the sections and developing any part of it would just push the area that is tipped on further onto the remaining common.
CCS Env Health	No issues identified
CCS Education	<p><u>Whitestone Primary</u>: There is capacity at this school to accommodate this small increase in pupil numbers</p> <p><u>Bishop Gore Comprehensive</u>: All developments proposed in the catchment for Bishop Gore would far exceed its capacity. Investment would be required to accommodate increase in pupil numbers</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>The site on an area of Common Land. It is also classified as Open Access Land under the CROW Act.</p> <p>Lies outside the sewer catchment area. The nearest STW is either Llannant or Gowerton. MOU issues.</p> <p>From aerial photographs the site is likely to be of ecological value (BAP Habitat). An area classified as Ancient Semi-Natural Woodland is located just to the north of the site boundary. A PRoW crosses the site at the south-western corner. Trees and scrub form the southern boundary of the site. The boundary of the Gower AONB is approximately 175 metres to the northern of the site.</p>
Dwr Cymru	<p>Site Specific Comments on the Draft Proposals Map:</p> <p>A water supply can be made available to service the proposed development site.</p> <p>No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>

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Western Power	<p>Western Power Distribution (WPD South Wales) presently have fifteen 33/11kV substations and two 132/11 kV substation providing electricity supplies in the Swansea area..... there is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth. However, please be aware it may be necessary for reinforcement works on the 132kV and 33kV network supplying these sites to be carried out, to enable the space capacity at the EHV/11kV transformation sites to be released.</p> <p align="center"><b>Swansea Primary Substation Demands 2011</b></p> <table border="1" data-bbox="685 563 1816 675"> <thead> <tr> <th data-bbox="685 563 1061 639">Substation (EHV/11kV)</th> <th data-bbox="1061 563 1440 639">Firm Capacity (MVA)</th> <th data-bbox="1440 563 1816 639">Maximum Demand (MVA)</th> </tr> </thead> <tbody> <tr> <td data-bbox="685 639 1061 675">West Cross **</td> <td data-bbox="1061 639 1440 675">14.6</td> <td data-bbox="1440 639 1816 675">10.5</td> </tr> </tbody> </table>	Substation (EHV/11kV)	Firm Capacity (MVA)	Maximum Demand (MVA)	West Cross **	14.6	10.5
Substation (EHV/11kV)	Firm Capacity (MVA)	Maximum Demand (MVA)					
West Cross **	14.6	10.5					
Coal Authority	No coal mining legacy features identified by the Coal Authority.						
Bishopston Community Council	<ol style="list-style-type: none"> <li>1. Common land requiring deregistration.</li> <li>2. Includes land not in the ownership of the agency who has registered this land as a candidate site.</li> <li>3. Loss of green wedge between Copley, Murton and Mayals/West Cross.</li> <li>4. Will require provision of land of equal area for those individuals who have "rights of common".</li> <li>5. Common used by commoner with ponies and occasionally cattle and sheep.</li> <li>6. Trans Atlantic cables are situated in verge on south side of common.</li> <li>7. No services presently available.</li> <li>8. Public footpath crosses from Mayals Road, Clyne Common to West Cross.</li> </ol>						

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Mumbles Community Council	<p><u>Preferred Strategy</u></p> <p>This objection is based on the identification on the key diagram of a 'limited rural/urban fringe extension' in the vicinity of West Cross - and also the reference in paragraph 6.50, which states:</p> <p>"There are however opportunities for small-scale settlement boundary amendments at appropriate village and urban fringe locations, in instances where the existing character of the village or settlement would be maintained or improved. Any sites allocated would generally amount to less than 4ha in total, although there is potential for larger sites within the northern part of this Zone. Controlled village/settlement expansion is the only viable way of delivering affordable, local needs housing. Opportunities have been identified at Scurlage, Pennard, Bishopston, Langland, Newton/West Cross, Dunvant, Three Crosses and Penclawdd/Crofty."</p> <p>At this stage of the LDP process, it is of course the case that no specific sites of this scale have been formally identified for residential development. However, it is likely that any future decision will be to include site(s) that have been promoted as part of the candidate site process. In specific reference to West Cross, the only candidate site that it on the western fringe of the built-up area is WC004 that covers much of Clyne Common. As common land, this area should not be developed. Further issues, such as landscape, biodiversity and the general relationship between the urban and rural areas further dictate that this land should not be developed.</p> <p>We note that this land has been rejected by the LPA via the Stage 1 Assessment of Candidate Sites and we support this decision. However, it therefore leads to uncertainty over what land the Council may have in mind for this area.</p> <p>For the avoidance of doubt, the Community Council's objection to development on the fringes of West Cross would probably apply to any other site that hitherto has not been promoted via the Candidate Site process.</p> <p>It is noted that the Transport and Access Topic Paper within the evidence base explains that the wider road network in Mumbles is already at capacity in several locations (paragraph 5.79), which is supported by anecdotal evidence from the local community and Community Council.</p>
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Moreover, there are pollution effects in Mumbles (see paragraph 5.80 of topic paper) that as a consequence of the volume of traffic would be further exacerbated by the quantum of development that the Preferred Strategy suggests is possible at West Cross.

The Gower Landscape Character Assessment Topic Paper considers the Clyne Common Character Area in some detail. It recognises that it is of high sensitivity to change and its character would be vulnerable to development on adjoining land. It is an open area that naturally leads to long views and high intervisibility. Its cultural and geological landscape value is "outstanding". Any development of this area would surely have severe and significant adverse and irreversible effects on the landscape and also visual effects.

Furthermore, even if any development of the common land is rejected, the LPA need to ensure that other development around the fringes of West Cross does not erode or impinge upon this sensitive landscape character area. As noted above, at this Preferred Strategy stage of the LDP process, the detailed site allocations are not known, but from the available evidence, it would seem logical, reasonable, sustainable and sound to resist and reject new development along this western fringe of the Mumbles area.

As noted elsewhere in the Community Council's submission of the LPA, there are shortcomings with the existing evidence base (albeit it is appreciated that this stage is "fuzzy" insofar as it is a strategy rather than a detailed and exact plan). Nonetheless, there are a wide range of factors that further suggest the development in this area should be resisted, including the remoteness of the site to existing facilities, likely effects on watercourses, drainage, sewerage and flood risk.

The LPA also need to consider in detail what planning obligations would be required in order for development in this area to be acceptable, for example physical infrastructure, road improvements, civil infrastructure, schools and other facilities. It is likely to be substantial and unrealistic amount and it is expected that by the time of the Deposit LDP the evidence base will future demonstrate that any development on or near this area will be unsound.

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### WC004

The site is located to the north of Chestnut Avenue in the suburban ward of West Cross. The boundaries are not necessarily entirely accurate due to them not being based on identifiable features on the ground. The road provides the southern boundary to the site, but with no current vehicular access to the land. For most of the length along the site frontage, the highway here has no pavement, just a narrow grass verge. There is a thick line of mature trees and bushes along the highway. The western, northern and eastern boundaries of the site appear to be no more than lines drawn on a map, because a site visit undertaken in January 2015 revealed no distinguishing features that could logically define the site. The site is generally rectangular, encompassing around two hectares of land. It is greenfield, comprising a mix of scrub, grasslands and vegetation. It is also common land, forming part of Clyne Common.

The site is located on the edge of West Cross, outside the settlement boundary. The part of West Cross to the south, i.e. enclosed by Chestnut Avenue, is characterised by flats and maisonettes laid out in cul-de-sacs. There are further large residential estates located in the Fairwood Road area; Fairwood Road itself connects the leafier Mayals suburb with the Swansea Bay seafront.

West Cross is a hilly suburb, with slopes generally running downhill to the east towards the bay. The site itself slopes around 10m from west to east. To the north and west, Clyne Common is generally flatter, being the crest of the local hill, whereas West Cross is noticeably steeper. For the avoidance of doubt, the site is around 90m AOD, the B4436 across the Common peaks at 96m AOD and the Mumbles Road along the seafront is close to the 10m AOD contour.

There is a network of Public Rights of Way that criss-cross Clyne Common, offering views into and across the site. One right of way leads parallel to the eastern boundary of the site, running from Chestnut Avenue to Mayals Road. Another footpath actually crosses the site in its south-western corner, leading from Chestnut Avenue west across the Common.

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	<p>West Cross does have a range of community facilities and services, however these are not as prevalent as in most other wards. As shown on the LPA's Ward Profile there is a medical centre and pharmacy on West Cross Lane (approximately an 800m walk away, via two steep hills). Whitestone Primary School is a 750m walk to the south. Aside from these facilities, most local services are found towards the seafront - almost 1,500m away via steep streets. The site is served by bus stops, which are located directly outside the site on Chestnut Avenue. These are served by a half-hourly service between Oystermouth and Swansea bus station.</p> <p>The site currently has no vehicular access. However the road network in the local area appears reasonable, albeit there are topographical constraints and a number of complex, tight or hilly junctions that are not conducive to significant increases in traffic. A search of the LPA's online planning register shows no recent planning applications affecting this site. It is worthwhile to also mention the site's status within the extant Unitary Development Plan: it is designated as green wedge and as common land, as well as being open countryside.</p> <p>The Preferred Strategy made reference to opportunities for development on the urban fringe of West Cross including identification on the Key Diagram a 'limited rural / urban fringe extension' in the vicinity of West Cross. At the time WC004 covered much of Clyne Common, including the smaller site that this report now assesses. The consultation response pointed out that the site was common land and should therefore not be developed. The response also mentioned issues including landscape, biodiversity and 'the general relationship between the urban and rural areas' which further suggested that the site should not be allocated. It should be noted that the LPA rejected the larger Candidate Site during the Stage 1 Assessment of sites. It was pointed out that MCC would likely resist other new development elsewhere on the fringes of West Cross, especially on countryside sites, and that the settlement boundary should be retained in its current location. Further reference was made to the available evidence base, which identified transport and access constraints within the entire Mumbles area and the highly sensitive landscape surrounding Mumbles, including West Cross / Clyne Common. Identified issues that in the opinion of MCC must be addressed should any major development be allowed in this vicinity, included access to community facilities, effects on watercourses, drainage,</p>
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sewerage and flood risk. It was also suggested that the LPA ought to consider the likely planning obligations that would be required in the West Cross area in order for major development to be acceptable without causing any detrimental effects on the area.

It is noted that according to the report to Committee (December 2014) this site is allocated for "primarily local needs / affordable housing", with an identified capacity of 50 dwellings.

In terms of transport and access, the evidence base does indicate that Mumbles as a whole experiences traffic problems. Whilst this may be severest closer to the coastline and in Oystermouth, West Cross is not without some problems. The topography and irregular road pattern mean there are regular pinch points, hills and tight junctions. Moreover, there is no existing access to the site at all, meaning that a completely new access will need to be created. With there also being a need for new pavements on the northern side of Chestnut Avenue, it is likely that development of this site will result in the complete removal of the hedges and trees along the existing grass verge.

A public right of way crosses part of the site. It is acknowledged that this is not necessarily an obstacle to planning permission being granted, but it will need to be retained or diverted. Perhaps of more importance is the potential impact upon users of the rights of way that pass close to and through the site. Development of this land would extend the urban area into the countryside and have a significant impact upon users of the footpaths and would completely alter the character of this part of the Common.

West Cross does seem to have some shortfall in community facilities, particularly in locations easily accessible from Clyne Common. It is acknowledged that the site is served by a reasonable bus service, but the site does not lend itself to trips on bicycle or on foot, due to the distance and intervening inconvenient topography to local facilities. Although the bus connectivity will be helpful in reducing the reliance on the car, there will be inevitably be a significant increase in car journeys as a result of this development. Furthermore, 50 dwellings are unlikely to trigger new facilities within the development, apart maybe from public open space.

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At present the LDP evidence base is lacking information on infrastructure and services, however it is appreciated that the current consultation is not the formal deposit stage. It is hoped that the deposit LDP is accompanied by a far more robust evidence base and also by the full SEA/SA and HRA. The local responses to the candidate site show there is considerable concern about the adequacy of the local infrastructure to accommodate an additional 50 properties. A review of the available evidence on housing land and supply as part of the LDP does not reveal the full reasoning for new housing sites on greenfields in the Mumbles area. We reserve the right to comment on this in detail once the deposit LDP and its accompanying evidence base are published later in 2015.

The Gower Landscape Character Assessment (2013) forms part of the LDP evidence base. It divides the Gower area into distinct landscape character areas and shows that this site is within the Clyne Common character area. Under the LANDMAP assessment, the area is attributed the following evaluation:-

- Visual and sensory - moderate (Clyne Common open rolling lowland)
- Geological landscape - outstanding (Fairwood Common lowland plateau)
- Landscape habitats - moderate (West of Gowerton improved grassland)
- Historic landscape - high (Gower Lowland Commons marginal land)
- Cultural landscape - outstanding (AONB)

The description within the Gower Assessment summarises that the Clyne Common LCA is demarcated in part by the hard urban edges of Mayals, Murton and Newton. It describes the LCA: "there is a strong sense of place, and accessible views are easily obtained from the public rights of way and public road, and the area is designated as Open Access Land." These are two of the area's special qualities and key characteristics. It is also noteworthy that the Ward Profile within the LDP evidence base notes this land is natural and semi-natural greenspace.

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Moreover, the area - again according to the Assessment - the large broad, gently sloping, plateau of Clyne Common has outstanding geological value. Its original character and form is largely intact. According to the Assessment, strengths of the LCA include its accessibility and its large-scale with open views. Weaknesses include the fact that "intrusive and incongruous features" can be seen due to the open nature of the landscape, including "unsympathetic development at urban edges". One of the identified threats to the LCA is given as: - "Building developments which may adversely affect the edges of the Common, including forming breaches in - and the removal of - the characteristic boundary hedge banks to the Common." Suggested management guidelines include that any settlement expansion should take account of the high degree of visibility across the Common. The open character should be maintained and visually significant boundary hedgerows safeguarded.

There are no environmental designations affecting the site, but that does not necessarily mean that the site is developable either in principle or in detail. The site appears to feature a mix of boggy land and drier areas, along with a mix of vegetation including trees, scrubs and grasses. There is certainly potential for features of conservation interest to be in situ, including flora and fauna. Furthermore there is considerable likelihood that the site, which is greenfield and appears to have been undisturbed for a long time, will have significant habitat features and high potential for protected species.

In terms of flood risk, the site is outside of any flood zone as shown on the TAN15 Development Advice Maps. However the environment agency interactive maps show that some of the site is at risk from surface water flooding. Springs rise on the site and also the site does not appear to drain well, which means development could cause further problems for the site or lead to further flood risk off-site to the south and east. The SFCA does show there have previously been emergency call-outs in the West Cross area as a result of flooding. Moreover, due to this site having originally been filtered out by the LPA in their Candidate Site Assessment, it has not been subjected to the full assessment of the SFCA.

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	<p>It is also evident that the site is designated as common land. This has considerable consequences. Firstly, it complicates the process of securing planning permission and will require separate applications to the Planning Inspectorate. Secondly, there are likely a variety of rights afforded to commoners, the community and / or the public regarding access and use of the common land. The proposed allocation is contrary to established planning policy that aims to protect common land from prejudicial development. Not only will there be a loss of common land but there will be a significant negative effect upon users of the land.</p> <p>The site originally formed part of a larger Candidate Site, but this has been amended in size. There have been at least 100 objections to the site: the content of the objections tend to be applicable to both the larger site and the current, smaller, site. The site failed the LPA's Stage 1 Assessment because, as set out in Appendix A of the LPA's report to Committee in March 2012, the site was "100% protected habitat." In August 2014 the LPA reported that Candidate Site WC004 had been placed on the 'C-List', i.e. "sites are subject of fundamental constraint, not of sufficient scale to be allocated within the Plan (less than 10 units), have been withdrawn in full for various reasons, or have been rejected/withdrawn in part. These C-list sites will not feature as allocations in the LDP." It is apparent that part of the site was withdrawn (presumably by the landowner). As of December 2014 it is now evident that the LPA have considered the amended site to be capable of being allocated.</p> <p>It is noted that the report to Committee (December 2014) says that where any proposed allocation does not get carried forward to the Deposit LDP, compensatory alternative provision will be sought within the same Strategic Housing Zone. This in itself needs fully justifying, as it is not inconceivable that more sustainable sites in a different housing zone should be preferred to sites in the west zone (i.e. Mumbles and Sketty) that have already failed to be allocated.</p>
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It is evident that there are serious flaws in the proposed allocation of this site for housing. Most obviously it will involve the loss of common land. This is not solely a problem due to the direct loss, but also because of the consequential effects upon users of the common and the public rights of way (and open access land). This alone should be reason to resist the loss of more than a hectare of common land. Moreover, due to the complex nature of common land law, there is a not insignificant chance that the site would not be developable or deliverable even if allocated.

The development of this site would contradict the findings of the Gower Landscape Character Assessment for Clyne Common and would surely have very significant effects upon the landscape - aspects of which are evaluated as outstanding. There is possible flood risk involved in the development of the site, especially when the replacement of a large greenfield site, boggy in places, is replaced with the impermeable surfaces of a housing development. There are likely ecological constraints to overcome, including the loss of boundary trees and hedges required to create a vehicular access. The site is not well located in terms of connectivity and accessibility. Although a reasonable bus service does pass the site, the shortage of services within walking distance is likely to result in a significant increase in the use of the private car in an area where there are already significant pressures on the road network and there are a number of sub-standard junctions. Moreover this development would extend the urban area further into the Gower, encroaching on to the Clyne Common and beyond the current extent of West Cross. There are no definable, defensible or logical boundaries to the proposed allocation; indeed, the proposed allocation per se is illogical and would not conform to the established urban form, settlement pattern or local context.

As this consultation only relates to the draft Proposals Map, this site has not been assessed fully by the LPA and there is not a complete evidence base to analyse. However it is remarkable that this site is proposed to be allocated, when, as part of a larger candidate site, it regularly failed the LPA's own tests and assessments. The smaller site, subject to this report, still shares the characteristics and constraints that precluded the larger site from progressing through the candidate site process. Without prejudicing any representations required at the deposit stage,



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	<p>we consider that the allocation of this site would fail the following tests:-</p> <ul style="list-style-type: none"> <li>• C1 - the land use plan does not have sufficient regard to the Gower Landscape Character Assessment</li> <li>• C2 - the plan does not have necessary regard to national policy insofar as a greenfield site which is common land and has other environmental constraints is proposed to be allocated</li> <li>• CE1 - no logical strategy would allow for an area of common land to be allocated for housing</li> </ul> <p>CE2 - no robust or credible evidence base would allow for an area of common land to be allocated for housing</p> <p>It is concluded that on the basis of the currently available evidence that this allocation would render the LDP unsound and as such we object on behalf of Mumbles Community Council to the proposed allocation.</p>
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### Stage 3A: Assessment Against LDP Objectives

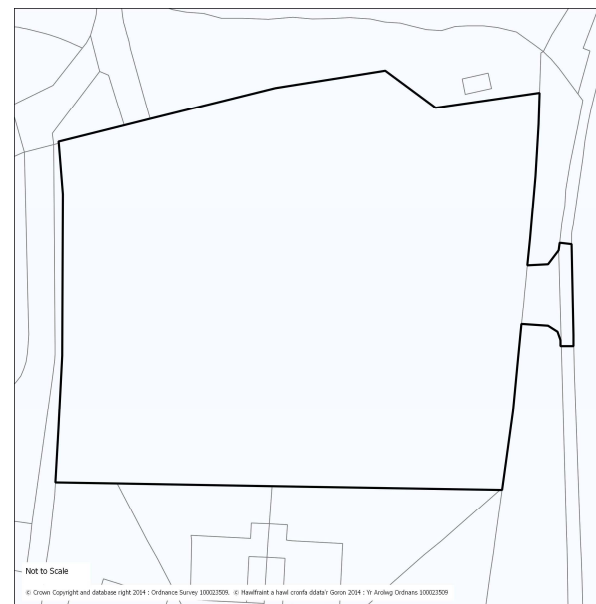
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-1	n/a	+1	n/a	n/a	n/a	n/a	+1	n/a	n/a	-2	0	-1	-2	n/a	?	+1	+2

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

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

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<b>Reference</b>	<b>WC009</b>
<b>Name</b>	<b>Former Eastmoor Nursing Home, Chestnut Avenue, West Cross</b>
<b>Description</b>	Brownfield site located within the existing settlement boundary on the western side of Chestnut Ave, immediately north of residential development at Eastmoor Park. Land further north and to the west is Clyne Common. The site has the benefit of a longstanding planning permission for redevelopment as 30 flats (kept live through demolition of the nursing home). However this scheme does not appear viable and has been moved out of the 5 year housing supply. It is likely that a revised scheme would need to be submitted to progress development at a lower density. Therefore, although the principle of development has been established at this location, the site is proposed as an allocation for 20 units rather than a commitment of 30 units.
<b>Size</b>	0.39ha
<b>Existing Land use</b>	Vacant – cleared site of former nursing home
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



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

Not consulted upon – remained a commitment at this time

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

Not consulted upon – remained a commitment at this time

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

The reduced density proposal was advertised on site in the form of site notices.

No comments received

### **Response to Representations**

No representations received.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p>Access to the site is presently from Clyne Common along a narrow un-surfaced track with restricted visibility at the junction. The proposal is to access the site directly from Chestnut Avenue and block off the existing access which will be gated and for emergency use only. The new access will emerge along a presently undeveloped frontage to Chestnut Avenue and will be constructed to a standard width allowing two-way flow. A footway will be provided on one side of the access and a footway also along the site frontage. Visibility at the proposed access point is satisfactory. Parking to cater for both residents and visitors is being provided within the site in accordance with adopted guidelines. With regard to traffic volume, the movements associated with a development of this nature are unlikely to be significant and can be accommodated on the adjoining highway network without causing any harm to local highway conditions (<i>comments relate to PP 2006/0251</i>)</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>May need an extended phase 1 survey on possible ecological constraints on parts of the site (<i>Nb. surveys at time of planning application found no protected species</i>)</p>
CCS Environmental Health	<p>No comments obtained</p>
CCS Education	<p><u>Whitestone Primary</u>: There is capacity at this school to accommodate this small increase in pupil numbers</p> <p><u>Bishop Gore Comprehensive</u>: All developments proposed in the catchment for Bishop Gore would far exceed its capacity. Investment would be required to accommodate increase in pupil numbers</p>

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<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Lies within the sewer catchment area, but drains to Gowerton STW. MOU issues.</p> <p>The site is adjacent to an area of Common Land (Clyne Common), which is classified as Open Access Land under the CRoW Act. The site itself is composed of scrub and mature trees. It is unclear whether the grassland at the site is BAP Habitat. We advise discussion with your Authority's Planning Ecologist.</p> <p>Possible pollution strategy needed.</p> <p>Possible contamination as former mine/mining area.</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.</p> <p><u>Waste:</u></p> <p><u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	<p>There is currently space transformation capacity at each of the substations which may be able to accommodate future load growth.</p>
Coal Authority	<p>No coal mining legacy features identified by the Coal Authority.</p>

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

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

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