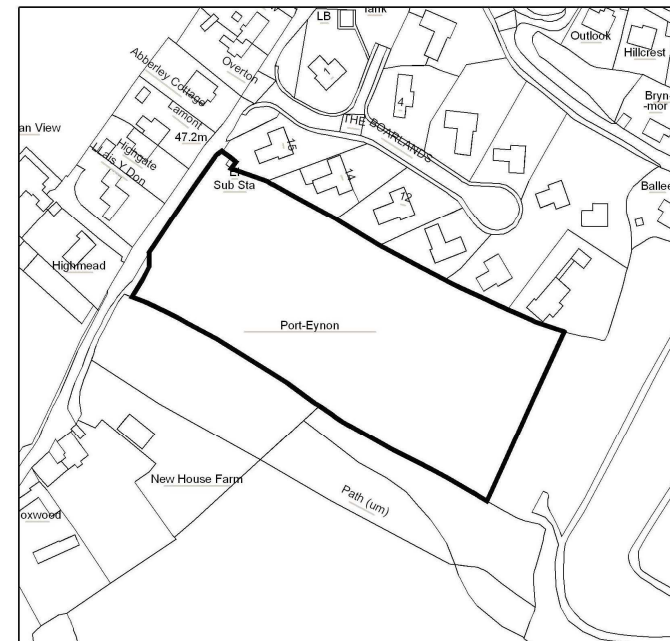


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Reference	GW002
Name	Land adjacent Boarlands Estate
Description	Rectangular shaped field on the southern side of the road between Overton and Port Eynon, which forms part of Bayview Farm. The site which slopes down to the SW is adjoined by a residential cul de sac to the NW and frontage residential development opposite the site to the NE. There is permanent caravan site to the south east and one of the fields to the SW has the benefit of temporary use for 5 caravans. Therefore, apart from an agricultural field abutting half the SW boundary of the site it is effectively surrounded by built /urbanising development. The site lies within the Port Eynon Conservation Area
Size	1.1 hectare
Existing Land use	Agricultural
Proposed Land Use	Residential
Location Plans	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.

24 letters of objection were received which are summarised below:

- Loss of agricultural land.
- Within Conservation Area.
- Encroachment in open countryside.
- Elevated and highly visible location.
- Contrary to current policy.
- Inadequate road infrastructure and site access.
- No economic or social need for large scale development.
- Inadequate water and sewerage systems.
- Adverse visual impact.
- Out of keeping with the character of the area.
- Intrusive and urbanising.
- Unacceptable precedent.
- Unacceptable impact on biodiversity
- Loss of soakaway/flood risk.
- Highway safety.
- Overdevelopment.
- Already sufficient holiday accommodation in this area
- Adverse impact on wildlife/loss of habitat.
- Limited local amenities.
- Inadequate public transport.
- Contrary to AONB Management Plan

In addition to this two petitions of objection were received one containing 115 signatures and the other 314. The issues raised are summarised below:

- Out of character.

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- Undesirable precedent.
- Within Gower AONB.
- Inadequate sewerage system.
- Inadequate road infrastructure and site access.
- No shortage of housing with many purchases being holiday/second homes and not feeding local demand.
- Adverse impact on wildlife.
- Detrimental to views and vistas.
- Intrusive urbanising effect.
- Loss of agricultural land.
- Inadequate public transport
- No agricultural, economic or social need
- Loss of green area.
- Loss of soakaway.

LDP Preferred Strategy Consultation: Summary of Representations

- 1 letter of support from the site owner's agent noting that the Preferred Strategy provides for small scale opportunities for settlement boundary amendments, supporting the proposed allocation and the inclusion of Port Eynon as a local centre

LDP Draft Proposals Map Consultation: Summary of Representations

- 1 letter from The Gower Society concerning the prominence of the site.

Response to Representations

- Acknowledge site is agricultural land but no indication loss of land would impact on viability of a wider agricultural holding. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land.
- A high level of protection is afforded to the preservation and safeguarding of historic features and their settings. This does not preclude development proposals from being brought forward in Conservation Areas, however significant prior assessment and evaluation must be carried out and appropriate mitigation measures undertaken if development is considered appropriate.
- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- Site is contained and would not be visually intrusive or impact on skyline as ridgeline of existing houses would not be broken by new development. Large caravans and engineering works have urbanised land to the south. Existing high density suburban estate type housing development to the east. Strong hedge line and static caravans to the west. Development of the site would not detract from existing mixed urban form.
- 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. The release of land at this location is only supported on the basis that it is for affordable 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.

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- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Suitable site access can be provided. Schemes could include footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site.
- DCWW have responded as part of the recent consultation and have confirmed that a water supply can be made available to service the proposed development site and that there are no problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required. Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements. In addition, there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding.
- Insufficient information to be able to comment on impact on character and amenity of the area at LDP allocation stage. This is a matter for planning application stage. The character of Port Eynon has been eroded by the highly regimented static caravans, touring caravan parks, modern estate style developments and domestic improvements/refurbishments which have had an intrusive and degrading effect on the traditional urban form. Any development would need to be in keeping with context of the AONB and have regard to the AONB Design Guide and would help enhance the character of the area.
- No ecological constraints have been identified. An extended phase1 habitat survey may 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)
- Vulnerable development such as residential may not be allocated in flood risk zones. All flood risk areas have been identified and excluded from consideration for development purposes. Incidents of localised surface water flooding have also been identified and any sites allocated at or near such areas will be required to incorporate appropriate remedial measures. Sustainable urban drainage scheme (SUDS) will be incorporated into development scheme as necessary. New development must demonstrate greenfield run off - no increase in surface water run-off will be permitted.

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- Proposal is not for holiday accommodation. Site is allocated as an exception site for local needs affordable housing which would have to be kept as such in perpetuity. Any proposal for market housing for use as tourist accommodation would not be supported. The planning system cannot prevent homes sold on the open market being used as holiday homes.
- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers. Port Eynon has shops, cafes and a bar/restaurant (summer opening only).
- Site is within 150m of an hourly bus service. Whilst adequacy of public transport is primarily a matter for the private sector and is influenced by market demand, the LDP seeks to sustain and encourage improvement of existing services by locating new development at sustainable locations close to existing communities.
- The AONB management plan supports the provision of affordable housing within Gower.
- The site does not form part of the greenspace system. This only applies to open space within defined urban settlements.

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access can be provided to the site.</p> <p><u>Local Highway Conditions:</u> The roads in the vicinity are restricted and of a rural nature. The approach road through Overton is single width with limited passing facilities.</p> <p><u>Accessibility:</u> The site is within 150m of 1 hourly bus service.</p> <p><u>Wider Issues / Combined effect:</u> The combined affect of sites in the locality will need to be considered due to the restricted nature of these rural roads.</p> <p><u>Restrictions:</u> A high traffic generating use would not be suitable. Any residential use will need to be restricted to a small number of units due to the very limited standard of the approach roads.</p> <p><u>Transport Proposals:</u> There are no planned transport schemes in the area.</p>

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CCS Housing	Gower The SHMA identifies the need to deliver 200 new homes within the Gower strategic housing policy zone, which should be affordable housing to meet local needs.
CCS Biodiversity	No issues identified
CCS Environmental Health	No issues
CCS Education	<u>Knelston Primary</u> : The proposed developments would leave the school with No Surplus capacity. Being a rural area there are no walking routes from the proposed sites, therefore pupils would need to be transported to school which is contradictory to the promotion of healthy living. Furthermore, there is very poor access to the primary school with no provision for safe drop off and pick up of pupils. <u>Bishopston Comprehensive</u> : All developments in the Bishopston Comprehensive catchment would take the school over its capacity. Some of the accommodation is housed within timber demountable classrooms. Highway Access to the site is of major concern and would require careful consideration of a new access in order for any expansion on the school site to be approved (recent STF planning approval had this as a condition of approval).
External Stakeholder	Comments
Natural Resources Wales	We advise consulting your Authority's AONB Team and refer you to the AONB Design Guidelines. A PRoW crosses through the centre of the site, which appears to mining composed of improved grassland. However, there appear to be some areas of rough grassland within the boundary, to the north of the site. The Gower Coast SSSI is located approximately 185 metres to the south of the site. Sewer: Overton STW.
Dwr Cymru	<u>Water Supply</u> : <u>Initial Comments for Candidate Sites in the Ward</u> : In particular during summer months, at times of peak demand there are major problems within the Gower area where properties suffer from poor mains water pressure. Would require modelling but possibly would need off site reinforcement and service reservoir / storage. Strong local network in the east but the distribution network is fragile.

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	<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>: The areas identified for future development within the Gower Ward have their own Waste Water Treatment Works and accordingly we have assessed the sites on that basis. The settlements of Overton, Port Eynon and Horton drains to Overton WwTW. Foul flows from the cumulative effect of site ref GW001, GW002 and GW003 cannot be accommodated at this works without further improvements.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/or diversion may be required.</p> <p>Overton Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Port Eynon Community Council	<ol style="list-style-type: none"> 1. Land is agricultural and located within the Port Eynon Conservation Area and the AONB, change of use would be contrary to the UDP. 2. More than adequate supply of luxury residential accommodation in the immediate area. 3. Site is elevated and development would be highly visible to the detriment of the AONB. 4. The sewage facilities serving this area are routinely overloaded. 5. The electrical supply serving this area is presently overloaded. 6. Overton Lane is inadequate to support change of use of this agricultural land to tourist accommodation.

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Stage 3A: Assessment Against LDP Objectives

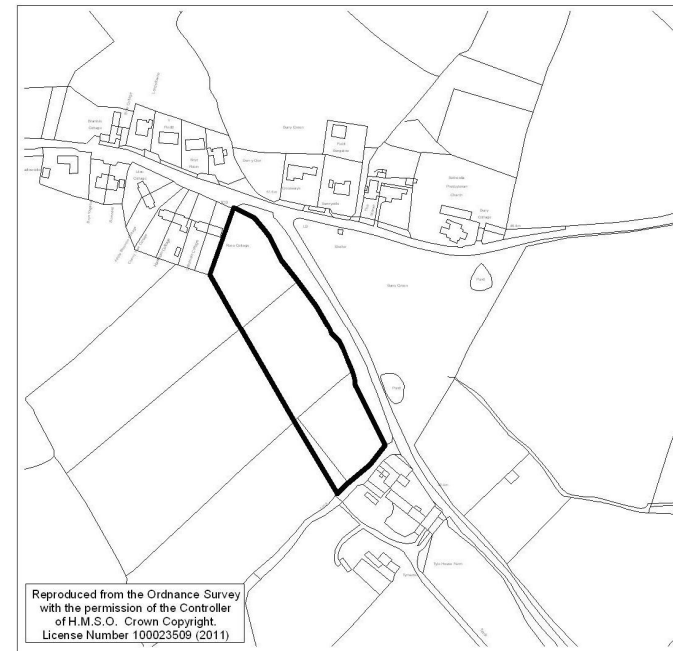
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	0	n/a	?	-2	n/a	+1	0	n/a	n/a	n/a	+2	-1	n/a	-1	0	-1	-1	n/a	?	0	+1

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	+	+	-	?	+/-	-	?	?	+	+/-	x	-	?	?	--	+	?

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Reference	GW010
Name	Land at Tyle House Farm, Burry Green, Gower
Description	Rectangular section of field 0026, alongside the unclassified road which runs from Burry Green to Knelston and located opposite Burry Green itself. The site is fairly level and has a mature trees/hedgerows fronting the road, together with a drainage ditch. The proposal would constitute frontage development linking with existing linear frontage development to the north.
Size	0.96 Hectares
Existing Land use	Agriculture
Proposed Land Use	Residential
Location Plans	OS Plan and Aerial (not to scale)



Candidate Site Public Consultation: Summary of Representations

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

14 letters of objection and 1 letter of comment were received which are summarised below:

- Constitutes linear development/ribbon development.
- Encroachment into open countryside.
- Within AONB.
- Detrimental effect on village.
- Inadequate site access.
- Loss of agricultural land.
- Undesirable precedent.
- Historical surroundings would be severely compromised.
- Adverse impact on character, appearance, landscape and ecological features of the area.
- Inadequate water/sewerage systems.
- Inadequate public transport.
- Highway safety.
- Inadequate road infrastructure.
- Contrary to AONB Management Plan.
- Small-scale low-key development could be acceptable but any attempt to build excessive "executive style" houses as a speculative venture would be entirely out of character in this sensitive position in the village and the AONB.

LDP Preferred Strategy Consultation: Summary of Representations

No comments were received specifically regarding this site.

LDP Draft Proposals Map Consultation: Summary of Representations

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

- Burry Green is not well supported by local services; this would not then seem practical to have affordable housing in this area with very limited public transport and no shops that you can walk to safely.

Response to Representations

- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- 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.
- It is not considered the development will have a detrimental effect on the village, but will add to village character, vitality and viability by providing affordable housing for local people, rather than holiday lets or market housing.
- 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 Highway Authority state that local roads could accommodate development of 10 dwellings.

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- Acknowledge site is good quality agricultural land but no indication loss of land would impact on viability of a wider agricultural holding. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land.
- Any development would have to have regard of listed building. A high level of protection is afforded to the preservation and safeguarding of historic features and their settings. This does not preclude development proposals from being brought forward, however significant prior assessment and evaluation must be carried out and appropriate mitigation measures undertaken if development is considered appropriate.
- Insufficient information to be able to impact on character and amenity at this stage. This is a matter for planning application stage. Any development would need to be in keeping with context of the AONB and have regard to the AONB Design Guide. Development of 'executive style' market housing on this site would not be supported by the Council.
- DCWW have responded as part of the recent consultation and have confirmed that there is sufficient water supply capacity and that there are no problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. However, the site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required. Impacts on water/sewerage infrastructure must be addressed through improvements incorporated into any development. DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan and hydraulic modelling assessment will be required at application stage required to establish the potential impact on the water supply network and necessary improvements. In addition, there is an ongoing programme of surface water removal (from the foul sewerage system) throughout the County to increase capacity and help alleviate flooding.
- There is a two hourly bus service within 200m of the site. Whilst adequacy of public transport is primarily a matter for the private sector and is influenced by market demand, the LDP seeks to sustain and encourage improvement of existing services by locating new development at sustainable locations close to existing communities
- The AONB Management Plan is in the process of being reviewed and sits below the LDP in the policy decision making framework. It supports the provision of affordable housing within the Gower AONB to meet local need.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: Access can be provided to the site although would be best in the form of individual accesses to a small number of units along the frontage.</p> <p><u>Local Highway Conditions</u>: The roads in the vicinity are restricted and of a rural nature. There are no footways present.</p> <p><u>Accessibility</u>: There is less than 2 hourly service past the site and a 2 hourly service within 100m of the site edge.</p> <p><u>Wider Issues / Combined effect</u>: The roads are unsuitable for significant development traffic.</p> <p><u>Restrictions</u>: These roads to the site are rural without footways. No significant traffic generation can be accommodated. A small number of plots along the frontage would be the most suitable form of development.</p> <p><u>Transport Proposals</u>: There are no planned transport schemes in the area.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p>
CCS Biodiversity	<p>Contains mature trees which have the potential for associated protected fauna. Protected species survey to determine the presence of protected species. Important features highlighted may require further survey.</p>
CCS Environmental Health	<p>No issues</p>
CCS Education	<p><u>Llanrhidian Primary</u>: There are limited surplus places within this primary. The combined impact of developments would leave the school at capacity. Being a rural area there are no walking routes from some of the proposed sites, therefore pupils would need to be transported to school which is contradictory to the promotion of healthy living. Furthermore, there is very poor access to the primary school with no provision for safe drop off and pick up of pupils. There is a risk of being unable to get planning approval to extend the school, coupled with significantly high development costs due to the ground conditions (note recent extension to the school highlighted ground faults).</p>

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	<p><u>Gowerton Comprehensive</u>: Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>
External Stakeholder	Comments
Natural Resources Wales	<p>We advise consulting your Authority's AONB Team and refer to the AONB Design Guidelines. A mature hedgerow forms the eastern boundary of site, which is valuable for connectivity. A PRoW runs to the south of the proposed site. Mature trees on the boundary may be suitable for use by Bats.</p> <p>Reynoldston STW.</p>
Dwr Cymru	<p><u>Water Supply</u>: <u>Initial Comments for Candidate Sites in the Ward</u>: In particular during summer months, at times of peak demand there are major problems within the Gower area where properties suffer from poor mains water pressure. Would require modelling but possibly would need off site reinforcement and service reservoir / storage. Strong local network in the east but the distribution network is fragile.</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>: The areas identified for future development within the Gower Ward have their own Waste Water Treatment Works and accordingly we have assessed the sites on that basis.</p>

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	<p>The settlements of Scurlage and Burry Green drain to Reynoldston WwTW. Foul flows from the cumulative effect of site ref GW007, GW008, GW010, GW012, GW013, GW014, GW015, GW017, GW018 and GW023 cannot be accommodated at this works without further improvements.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site. The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Reynoldston Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Llangennith, Llanmadoc and Cheriton Community Council	The Community Council strongly objects to the inclusion of this site which constitutes linear development and is a substantial encroachment into open countryside. Burry Green is a hamlet and such an extension would have a detrimental effect on the typical village which is at the heart of the AONB. The road onto which access would be achieved is at the end of a narrow road (known as Burry Alley) where there are already problems with the narrow access.

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

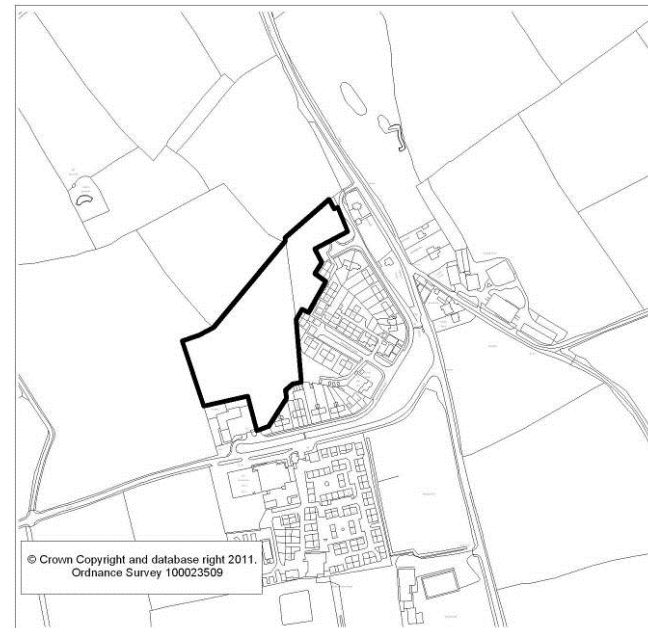
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Stage 3B: Assessment Against SEA/SA Objectives

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

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Reference	GW023
Name	Land at Monksland Road, Scurlage [CCS Site]
Description	Irregular shaped level site, consisting of two field parcels (2360 and 3074) and part of a third field parcel (1973), to the north east of the village of Scurlage, at the rear of properties along the north side of Monksland Rd and Salisbury Close. Part of the northern boundary does not follow an established field boundary but passes diagonally through the south east of field parcel 1973 to meet the northern boundary of field parcel 3074. NE field parcel has benefit of recent planning permission for 14 units Approximately 25 units could be built on the remaining land
Size	2.16 Hectares
Existing Land use	Undeveloped Land
Proposed Land Use	Residential
Location Plans	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 a site notices.

10 letters of objection were received which are summarised below:

- Loss of agricultural land.
- No current need for an expansion of the village.
- Within AONB.
- Contrary to current Policy.
- Inadequate drainage.
- Inadequate sewerage systems.
- Inadequate electricity supplies.
- Development outside village boundary.
- Adverse visual impact.
- Inappropriate size and scale.

In addition to this 2 letters of support and 2 letters of comment were received as summarised below:

- No current demand for additional housing. Should a new demand arise then these fields would be acceptable.
- Land earmarked for community housing for many years. Whilst within agricultural land and the AONB it would not unduly have an undesirable impact on the landscape.

LDP Preferred Strategy Consultation: Summary of Representations

Gower Society commented:

- We understand that Scurlage has designated Council-owned land (not covered by the Candidate Site process and not shown on the current UDP Maps and we have no clear idea about area or possible house numbers) that could be put to affordable house use. It is on an infrequent bus route to Swansea (15 miles) but there are very few jobs on Gower and whoever occupies

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any new houses will – for the most part- either be retired or commuters. This does not promote sustainability and we consider the specific identification of Scurlage in para 6.50 to be questionable. How many houses and in what specific location and what employment is available for new residents?

We understand that a number of existing Council houses in Scurlage (and one in Rhossili) are occupied by people re-housed from Swansea. This does not make sense if there is a local demand; but strongly suggests that there is not a proven local need

LDP Draft Proposals Map Consultation: Summary of Representations

4 letters of objection were received which reiterated previous comments and made the following additional observation:

- Due to its location in the village the opportunity for positive benefits will be limited and will not address the design issues raised in the Gower Design Guide.

1 letter of comment:

- The Gower Society support larger plots identified i.e. Reynoldston, Scurlage, Port Eynon, Burry Green, Knelston and Llanrhidian provided specifically used for purposes described.

Response to Representations

- Acknowledge loss of agricultural land but no indication loss would impact on viability of a wider agricultural holding. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land.
- 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. This is one of the most sustainable locations for new development, given the close proximity to services such as doctor's surgery, pharmacy, shops, and public house/restaurant.

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- 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
- No drainage issues identified. 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.
- All relevant utility providers have been consulted and no significant utility constraints have been identified
- Insufficient information to be able to judge size and scale at LDP allocation stage. This is a matter dealt with through the planning application process. Any development would need to be in keeping with context of adjoining development
- 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 settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan
- Visual impact will be considered at design stage and mitigated via planting and landscaping. Any development will have to have regard to the Gower AONB Design Guide.
- Scurlage is considered to be able to accommodate growth, due to the services/facilities located within the village and well designed buildings will reinforce village character and identity. The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: Access is possible but will need to be carefully located so as to provide sufficient distance from the Surgery access.</p> <p><u>Local Highway Conditions</u>: The roads in the area are restricted and of a rural nature. There are no footways present on the approach roads. The junction of Monksland Road with the main road is sub standard and would need to be widened with possibly footways added.</p> <p><u>Accessibility</u>: There is an hourly service within 50m of the site.</p> <p><u>Wider Issues / Combined effect</u>: The roads generally are unsuitable for significant development traffic.</p> <p><u>Restrictions</u>: The roads to the site are rural without footways. No significant traffic generation can be accommodated. The site is likely to require local improvements and a Transport Assessment is likely to be required due to the size of the site and its potential to generate a significant amount of traffic.</p> <p><u>Transport Proposals</u>: There are no planned transport schemes in the area</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies the need to deliver 500 new homes within the Gower/Gower Fringe strategic housing policy zones, the majority of which should be affordable housing to meet local needs.</p>
CCS Biodiversity	<p>This site contains potentially important Hedgerows protected under HR. Hedgerow assessment to determine the hedgerows quality.</p>
CCS Environmental Health	<p>No issues</p>
CCS Education	<p><u>Knelston Primary</u>: The proposed developments would leave the school with No Surplus capacity. Being a rural area there are no walking routes from the proposed sites, therefore pupils would need to be transported to school which is contradictory to the promotion of healthy living. Furthermore, there is very poor access to the primary school with no provision for safe drop off and pick up of pupils.</p>

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	<p><u>Bishopston Comprehensive</u>: All developments in the Bishopston Comprehensive catchment would take the school over its capacity. Some of the accommodation is housed within timber demountable classrooms. Highway Access to the site is of major concern and would require careful consideration of a new access in order for any expansion on the school site to be approved (recent STF planning approval had this as a condition of approval).</p>
External Stakeholder	Comments
Natural Resources Wales	<p>Sewer: Reynoldston STW.</p> <p>We advise consulting your Authority's AONB Team and refer you to the AONB Design Guidelines. The site appears to consist of improved grassland. Hedgerows around site are valuable and should be to be retained.</p> <p>Major Aquifer- All foul drainage must connect to main sewerage system.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: In particular during summer months, at times of peak demand there are major problems within the Gower area where properties suffer from poor mains water pressure. Would require modelling but possibly would need off site reinforcement and service reservoir / storage. Strong local network in the east but the distribution network is fragile.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site. The site is crossed by a water main for which protection measures, either in the form of an easement and / or diversion may be required.</p> <p><u>Waste</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: The areas identified for future development within the Gower Ward have their own Waste Water Treatment Works and accordingly we have assessed the sites on that basis.</p>

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	<p>The settlements of Scurlage and Burry Green drain to Reynoldston WwTW. Foul flows from the cumulative effect of site ref GW007, GW008, GW010, GW012, GW013, GW014, GW015, GW017, GW018 and GW023 cannot be accommodated at this works without further improvements.</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. Reynoldston Waste Water Treatment Works - Limited capacity.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Port Eynon Community Council	<ol style="list-style-type: none"> 1. Land is agricultural and is located within the AONB; the proposed change of use would be contrary to the UDP. 2. This land is already in Council ownership and has been identified for growth of the Scurlage community. This should be the preferred policy. 3. Development of this site can be served by the existing road infrastructure and will not be visually overbearing from the surrounding roads and vantage points. 4. The drainage/sewage facilities serving this area are routinely overloaded. 5. The electrical supply serving this area is presently overloaded.
Rhossili Community Council	In our AONB, it is vital to recognise the value of sensitive development while treasuring the history, land, character and quietness of Gower. Tourism is a major contributor to the prosperity of both Swansea and Gower. Some development of Scurlage could be acceptable and have a positive impact on the area and community. It is desirable that young people and families growing up on Gower can afford housing to stay. It would be entirely unacceptable for all sites to be developed. This would overwhelm and urbanize the area, creating a big settlement out of proportion with its locality.

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

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Reference	PN001
Name	Land adjoining Pennard Drive, Pennard
Description	The site lies within the Gower AONB to the SE edge of the village of Pennard. It is located to the north side of the main Pennard Road and immediately abuts a suburban, non Gower vernacular, 1960/70's housing estate to the north and west. There is sporadic linear frontage development to the south side of Pennard Rd and open countryside to the east. The land is currently used for agricultural purposes, level and screened by mature vegetation to the site frontage. An existing estate road follows most of the western boundary of the site from where access would be obtained.
Size	2.1 Ha
Existing Land use	Agriculture
Proposed Land Use	Residential
Location Plans	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.

117 letters of objection were received which are summarised below:

- Loss of agricultural land
- Development outside settlement boundary
- Lack of local services
- New doctor's surgery rejected on this site
- Loss of green space
- AONB
- Adverse impact on character and amenity
- Increased traffic on inadequate road infrastructure
- Inadequate access roads
- Encroachment into open countryside
- Inadequate sewerage system/water system
- Lack of local services e.g. doctors, post office, libraries, police etc.
- Unacceptable precedent
- Urban sprawl
- Green belt
- Adverse impact on wildlife/habitat
- Contrary to AONB Design Guide
- Highway Safety
- Adverse impact on tourism and local economy
- Local schools at capacity
- Adverse visual impact
- Increased noise and pollution
- Poor bus service
- Adverse impact on health and well being
- Would not provide affordable housing

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- Loss of open space

LDP Preferred Strategy Consultation: Summary of Representations

1 letter of from a major housebuilder:

- Supporting the need for additional growth at selected rural settlements commensurate with the scale and function of the settlement identified. Such growth should not amount to more than 4 hectares, complement the existing settlement form/function, and enhance the character and setting of the area. To that end, the extension of Pennard via candidate site reference PN001 represents a sustainable and viable means of meeting the desired objectives; being of a scale complementary to the existing village form (measuring 2.1 ha), capable of reinforcing demand for services and enhancing the existing character and setting of the area while delivering much needed new housing

Letter from Cllr Lynda James

- Population growth is overestimated; therefore number of new dwellings is far too great. Should focus development on brownfield sites
- Population of Gower is dispersed rural dwellings/small villages/hamlets surrounded by prime agricultural land. Use of such land for building is short sighted
- Tourism is a major industry in the area. To spoil rural impact would be detrimental
- Estimated 500 new dwellings are required on Gower and Gower Fringe. Some infill is possible without having a detrimental effect. However only plots of 10 or more are counted towards numbers. Few windfall plots are of that size. All new dwellings should count towards plan

LDP Draft Proposals Map Consultation: Summary of Representations

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

- The only way of actually achieving affordable and sustainable homes is through complying by Welsh Government TAN 6.
- Disappointed that the school does not appear to have been formally consulted in this process,
- Broadband services would drop considerably
- Is it wise to be building houses near sink holes

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- Any development here should include permission for 10% of the properties to be built for first time buyers and retirement homes. Locals should have the opportunity of purchasing the first time buyer houses.
- Devalue property.
- Result in a loss of rural views.

3 letters of support were also received which recognise that although there will be some environmental impact associated with developing the site, it meets the criteria for sustainability, affordability and ready access to essential services.

Response to Representations

- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes
- The LDP is based on sustainability principles which seek to maximise the use of vacant and underdeveloped land within existing settlements provided satisfactory standards of open space/recreational space are retained within those communities before encroachment of development into rural areas around the urban fringe is considered.
- Acknowledge site is good quality agricultural land but no indication loss of land would impact on viability of a wider agricultural holding. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the LDP Spatial Options Appraisal and site deliverability assessment the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing /employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land
- The site has good access to services/facilities - a doctor's surgery, primary school, library, playing fields and play facilities, community centre and local shop. The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers

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- The doctor's surgery was rejected in 2005 when assessed against previous development plan policies (Swansea Local Plan, Review No 1). Upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan.
- Does not form part of the greenspace system, not public open space and is not a green belt. The greenspace system only applies to open space within defined urban settlements.
- The release of this site is an exception and not set a precedent. The site is located within the AONB where 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 the site is allocated for development. The release of land for such purposes would be an exception and not set a precedent.
- Insufficient information to be able to impact on character and amenity. This is a matter for planning application stage. Any development would need to be in keeping with context of the AONB and have regard to the AONB Design Guide, rather than the high density housing estate layout to the west which has no particular character or architectural merit.
- No objection from Highways Department. Road system is capable of accommodating additional vehicle movements. Highways 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. Suitable access to the site can be suitably constructed.
- No objection from Dwr Cymru/Welsh Water. The local water supply is sufficient to meet the projected growth and the flow can be accommodated at Southgate WwTW.
- Habitats survey required but no fundamental constraints identified. 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). Hedgerows should be retained as part of any development proposal and form natural defensible boundaries

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- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21st century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. In West Swansea an ageing population profile and limited opportunities for new build housing/ under occupation of housing by increasingly elderly population will likely see a reduction in demand for school places from within existing catchments. Pennard school site is large enough to accommodate an extension if needed.
- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity or any material increase in noise or other sources of pollution. The planning application process would not permit development that would result in harmful levels of pollution. Potential noise/disturbance during construction is not a material planning consideration and is subject of separate legislative control
- Hourly bus service (weekdays and Saturdays) runs past the site. Whilst adequacy of public transport is primarily a matter for the private sector and is influenced by market demand, the LDP seeks to sustain and encourage improvement of existing services by locating new development at sustainable locations close to existing communities
- Creating new places which foster the health and wellbeing of both existing and future residents in a key objective for the LDP. There will be a positive impact on health and wellbeing as the development will help address specific issues of a lack of affordable housing for first time buyers and lack of older person's accommodation. It is within walking distance of many community facilities, public transport routes and Public Rights of Way.
- 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. The release of land at this location will only be promoted by the Council if the majority of the development is affordable housing.
- The sites is compatible with advice contained within TAN 6, which states that in larger villages, where housing sites are identified, development plans should set indicative targets and thresholds for the provision of affordable housing. No candidate sites have been submitted by landowners for 'One Planet Developments'.
- Broadband speeds are not a justification for resisting further development. Provision of state of the art utility infrastructure, including broadband, to all of Gower is supported. Any future developers would be required to work with utility services providers to ensure there are no utility infrastructure constraints arising from development.

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- Devaluation of property is not a material planning consideration There are no rights of open access or views over the countryside adjoining existing settlements
- All new dwellings ranging from single infill plots to allocations of 10 or more dwellings contribute towards the 500 unit target for Gower/Gower Fringe, i.e. just over 30 per annum over the plan period (reflective of past build rates). Only sites capable of accommodating 10 or more units are specifically shown on the LDP Proposals Map. The largest contribution towards meeting the housing requirement will actually be delivered by sites of less than 10 units.

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> A suitable access can be constructed</p> <p><u>Local Highway Conditions:</u> The footway along the site frontage is in need of widening.</p> <p><u>Accessibility:</u> There is an hourly bus service past the site</p> <p><u>Wider Issues / Combined effect:</u> There is a need to consider traffic calming on Pennard Drive and Linkside Drive.</p> <p><u>Restrictions:</u> Local improvements and traffic calming in the area is necessary as a result of development.</p> <p><u>Transport Proposals:</u> There are no transport schemes identified currently.</p>
CCS Housing	<p>Gower/Fringe</p> <p>The SHMA identifies the need to deliver 500 new homes within the Gower/Gower Fringe strategic housing policy zones, the majority of which should be affordable housing to meet local needs.</p>
CCS Biodiversity	<p>Contains potentially important Hedgerows protected under Hedgerow Regs.</p> <p>Hedgerow assessment to determine the hedgerows quality.</p>
CCS Environmental Health	No comments
CCS Education	<p><u>Pennard Primary:</u> The school currently is extremely close to capacity. Therefore any increase in numbers on a short term basis would require additional accommodation. The site is large enough to accommodate an extension to the school. NB Pupils from Pennard have transport provided at Local Authority cost to secondary school</p>

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	<p><u>Bishopston Comprehensive</u>: All developments in the Bishopston Comprehensive catchment would take the school over its capacity. Some of the accommodation is housed within timber demountable classrooms. Highway Access to the site is of major concern and would require careful consideration of a new access in order for any expansion on the school site to be approved (recent STF planning approval had this as a condition of approval).</p>
External Stakeholder	Comments
Natural Resources Wales	<p>We advise consulting your Authority's AONB Team and refer you to the AONB Design Guidelines.</p> <p>Falls outside DCWW sewer catchment area. Seek advice from DCWW.</p> <p>Discharges to Southgate STW. WFD classified as - Moderate. Pennard Pill East.</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.</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>: Foul flow from the site ref PN001 can be accommodated at our Southgate (Hael Lane) WwTW.</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>Southgate Hale Lane WwTW – 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>

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Coal Authority	No coal mining legacy features identified by the Coal Authority.
Pennard Community Council	<ul style="list-style-type: none"> - This is prime agricultural land and should remain as such - The proposed site is extending the boundaries of Pennard Community which is accessed by a narrow road and it is unlikely that the infrastructure could cope. - This site was considered for a new doctor's surgery and was rejected as outside the village envelope – the site should remain a green area. - There has been considerable expansion to Pennard/Southgate and further development should be resisted as it is tending to make Pennard an urban area in the AONB.
Ilston Community Council	This would mean extending the village boundary, increasing traffic and a strain on the local infrastructure. This land is green belt and previous LDPs have stated that this land will not be developed. This land should remain for agricultural purposes. The Gower is an AONB and village boundaries are supposed to be protected

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

Stage 3B: Assessment Against SEA/SA Objectives

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

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Reference	FA008
Name	Fairwood Hospital, Gower Road
Description	The site lies in the open countryside to the west of the settlement of Upper Killay. It is situated off the north side of the A4118 and is built on and surrounded by Common Land. The land to the west and south is a SSSI and SAC and the site contains a number of buildings and grounds used for health care purposes.
Size	0.83 Ha
Existing Land use	Health Care Facilities
Proposed Land Use	Residential
Location Plans	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.

59 letters of objection were received which are summarised below:

- Inadequate sewerage system.
- Inadequate drainage/flood risk.
- Local schools at capacity.
- Highway safety.
- Inadequate road infrastructure.
- Adverse impact on character and amenity of village.
- Adverse impact on wildlife and destruction of habitat.
- Contribute to urban sprawl.
- Adverse visual impact.
- Adverse impact on tourism.
- Adverse impact on noise and light pollution and litter.
- Green field site.
- Common Land.
- Development should be encouraged in existing urban areas to reduce CO2 emissions.
- Unacceptable precedent.
- Blurring of village boundaries.
- No defensible boundary which would act as a physical barrier to prevent further growth.
- Encroachment into open countryside.
- Inappropriate scale and size.
- Development outside village envelope.
- Contrary to Rural Development Plan.
- Contrary to current policies.
- Inadequate public transport.
- SSSI and SAC.

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In addition 4 letters of comment was received which raised the following issues:

- Redeveloping old hospital site within confines of current building does not seem reasonable.
- Concerns that it is extending beyond and will encroach further on the common.
- Use/save existing building.
- Would object to an increase in footprint.
- Within Gower AONB & brownfield site outside existing settlement. Any residential use should utilise existing buildings and not increase the density

LDP Preferred Strategy Consultation: Summary of Representations

No comments were received specifically regarding this site.

LDP Draft Proposals Map Consultation: Summary of Representations

1 objection which can be summarised as:

- Should be within or adjoining settlement to be an acceptable rural exception site

Response to Representations

- Potential capacity constraints identified by Dwr Cymru/Welsh Water at the Gowerton Waste Water Treatment Works if all candidate sites came forward which discharge to that works. No objection from DCWW but further discussions required during the planning application stage
- Low risk of surface water flooding. Sustainable urban drainage scheme (SUDS) will be incorporated into any development scheme if necessary. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- Capacity available at Crwys Primary. Secondary catchments undergoing a review in West Swansea
- Current site access may need improvement, but could be accommodated. Footways would be required and highway improvements.

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- 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
- This site contains potentially important Hedgerows protected under HR. A hedgerow assessment to determine the hedgerows quality will be required
- The site is contained and would not extend development into the countryside beyond the site curtilage
- Insufficient information at present to appraise visual impact, but any development would require a landscape impact assessment.
- Proposal would have no impact on tourism and may have a positive impact on the local economy by providing affordable homes in Gower, enabling people to stay in their local communities
- There is no indication of significant pollution levels as a result of the residential development proposed, the planning application process would not permit development that would result in harmful levels of pollution. Litter is not a material planning consideration.
- The site is brownfield – existing hospital use, though acknowledge much of the curtilage has the appearance/character of Greenfield site.
- Common land is not an insurmountable constraint to development, [particularly given existing development on site - compensatory provision within the locality must be made
- Housing should be developed throughout the County, not just focusing on urban areas. The Strategic Housing Market Assessment has identified the Gower AONB and Gower 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 (e.g. Newton Court or McCarthy and Stone type accommodation) providing local alternatives to current high proportion of under – occupied family housing.
- The site is an existing developed area which could be redeveloped at any time, subject to development plan policies. Its redevelopment would not establish a precedent.
- All settlement boundaries have been reviewed as part of the development plan process.
- The site has a defined curtilage with defensible boundaries.
- Proposed development of local needs affordable housing is not contrary to the Rural Development Plan.
- 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.
- There is a high frequency bus service – every 30mins past the site.

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- The site is not part of a SSSI or a SAC.
- The site is not within the Gower AONB.
- As a brownfield site close to an existing settlement this site represents a good opportunity to provide much needed affordable housing in the Gower fringe.

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> A suitable access could be constructed. Current access may need improvement</p> <p><u>Local Highway Conditions:</u> The site is in a rural location with limited provision of footways. It will not accommodate a significant increase in traffic in its present condition.</p> <p><u>Accessibility:</u> There is a 30 minute service past the site.</p> <p><u>Wider Issues / Combined effect:</u> There is a lack of footway provision in the area as it is a rural location. Significant development will require more urban facilities such as footways.</p> <p><u>Restrictions:</u> Only development that would generate a similar level of traffic as currently should be considered.</p> <p><u>Transport Proposals:</u> There are no transport proposals currently.</p>
CCS Housing	There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies the need to deliver 500 new homes within the Gower/Gower Fringe strategic housing policy zones, the majority of which should be affordable housing to meet local needs.
CCS Biodiversity	This site contains potentially important Hedgerows protected under HR. A hedgerow assessment to determine the hedgerows quality.
CCS Environmental Health	No comments
CCS Education	<u>Cila Primary:</u> There is no capacity to increase the size of Cila, a Statutory Notice would be required. There is limited scope to develop the site due to topography. There is also concern regarding highway access and the lack of appropriate pick up and drop off at the school.

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	<p><u>Olchfa Secondary</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>
External Stakeholder	Comments
Natural Resources Wales	<p>Consider MOU. European Protected Species (EPS).</p> <p>Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>The site is adjacent to the Gower Commons SAC / Fairwood Pengwer and Welshmoor SSSI. Mature trees form part of the hedgerow boundaries which surround the site. These should be retained to ensure connectivity is maintained. Records of bat species at the Fairwood Hospital site. In addition to records of otter in the wider area. Should any demolition / alteration of buildings be proposed, an assessment / survey of their suitability for bat species should be undertaken, prior to any work.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site.</p> <p><u>Waste</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

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	<p><u>Site Specific Comments on the Draft Proposals Map:</u> Due to the size of the public sewerage system in this area and the likely demands from the proposed allocation it is unlikely the public sewers will be adequate to accommodate the site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth
Upper Killay Community Council	Objects to further expansion of Killay on its Gower side and encroachment of housing onto green sites. Upper Killay should remain a Village. The Council asserts strongly there should be no diminution of the protection afforded by existing planning restrictions in the AONB, whether in the heart of Gower or, as here, in an urban fringe village. Any possible benefit is substantially outweighed by the potential damage to the environment and amenity that could be caused by more housing on the Gower fringe. Could lead to further infill. Increased traffic in the Village is also a concern.

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

Stage 3B: Assessment Against SEA/SA Objectives

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

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Reference	FA010
Name	Land to the East of Gowerton Rd, Three Crosses
Description	A wedge-shaped field parcel situated at the eastern edge of the village of Three Crosses between the rear gardens of residential properties fronting Gowerton Road and Dunvant Road. The site is situated close to the centre of the village and is currently used for agriculture. Access to this level site is from Gowerton Rd. It contains mature hedgerows and is well screened by surrounding development. The proposal as originally submitted has been amended to exclude an additional field parcel to the east. AS amended the site is similar in nature and form to Coed Y Crwys - a modern cul de sac development allowed on the opposite site of Gowerton Rd.
Size	1.1Ha
Existing Land use	Agriculture
Proposed Land Use	Residential
Location Plans	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.

737 letters of objection were received which are summarised below:

- Inadequate road infrastructure and poor site access.
- Local schools are at capacity.
- Inadequate sewerage system.
- Borders AONB.
- Inadequate drainage/flood risk.
- Detrimental impact on the community.
- Outside village boundary.
- Adverse visual impact.
- Adverse impact on character and amenity.
- Adverse impact on wildlife/destruction of habitat.
- Highway safety.
- Green Wedge.
- Unacceptable precedent.
- Encroachment into open countryside.
- Loss of privacy.
- Possible unstable land due to old mine workings.
- Overdevelopment.
- Loss of agricultural land.
- Adverse impact on noise pollution, light pollution and litter.
- Common Land.
- Lack of local services e.g. medical facilities.
- Adverse environmental impact.
- Adverse impact on tourism.
- Inappropriate size and scale.
- Adverse impact on crime and anti-social behaviour.

PLANNING COMMITTEE – 11TH JUNE 2015

- Affordable housing inappropriate in this location.
- Urban Sprawl.
- Inadequate public transport.
- Contrary to current policies.
- Lack of employment.
- SAC & shellfish mortality/SSSI.
- Contrary to Rural Development Plan.
- Coalescence of villages.
- Devaluation of property.

LDP Preferred Strategy Consultation: Summary of Representations

1 support from site promoter which can be summarised as follows:

- Support for the identification of Three Crosses as a location for sustainable growth

LDP Draft Proposals Map Consultation: Summary of Representations

1 letter of support received from site promoter.

- The formal support is backed up with a transport statement that addresses the transport issues for this site, proposes access works and demonstrates how these works will not only overcome the highway issues but also deliver wider benefits.

Responses to Representations

- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority. Schemes could include road widening, footway provision, junction improvements, speed restrictions, etc and will depend on the specific requirements for each site.

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- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21st century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers.
- DCWW envisage no problems with the public sewerage system for domestic foul flows from this proposed development site and a water supply is available.
- Site lies outside the AONB.
- No risk of surface water flooding identified. Sustainable urban drainage scheme (SUDS) will be incorporated into any development scheme if necessary. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- Impact on the community may be positive, as will provide local needs affordable housing (which may include older people's homes) for those who wish to stay in the community but cannot afford to do so
- All settlement boundaries have been reviewed as part of the LDP process.
- Insufficient information at present to appraise visual impact, but any development would need to be in keeping with context of adjoining development and may require a landscape impact assessment.
- 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). Hedgerows will be retained as far as possible as part of any development proposal and form natural defensible boundaries
- 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.
- 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.

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- The impact of development on adjacent properties would be a matter to be addressed through the detailed site layout at the application stage. Any development would need to respect the density, scale and character of adjoining development and have to have regard to the Places to Live Residential Design Guide SPG which sets out separation distances to ensure there is no detriment to privacy, amenity, etc
- All proposals would require further site investigations during the planning application stage.
- Site is agricultural grade 3. There is no indication that the sites loss would undermine the viability of any farm holdings.
- There is no indication of significant pollution levels as a result of the residential development proposed, the planning application process would not permit development that would result in harmful levels of pollution. Litter is not a material planning consideration.
- The site is not Common Land.
- Three Crosses has many facilities and services which smaller villages do not have, for example a primary school, village hall, shop and pub.
- 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
- Proposal would have no impact on tourism and may have a positive impact on the local economy by providing affordable homes in Gower, enabling people to stay in their local communities.
- Any new development would be built to design out crime in accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- The LDP seeks to safeguard against coalescence and development must respond to the character of existing settlements. The proposed site does not extend any nearer to neighbouring settlements than the existing built form of the village
- Devaluation of property is not a material planning consideration There are no rights of open access or views over the countryside adjoining existing settlements
- NRW have not identified any concerns regarding proposed development affecting environmentally protected areas (SSSI's etc) within the vicinity of the site. The submission has been subject to a sustainability appraisal and Strategic Environmental Assessment, under the SEA Directive.

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- 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
- There is an hourly bus service past the site which is reasonable for a rural location. Whilst adequacy of public transport is primarily a matter for the private sector and is influenced by market demand, the LDP seeks to sustain and encourage improvement of existing services by locating new development at sustainable locations close to existing communities
- The Rural Development Plan supports the provision of local needs affordable housing.

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> The site abuts Gowerton Road within a short distance of the junction opposite. This is below the recommended distance for junction separation and may restrict the site potential</p> <p><u>Local Highway Conditions:</u> There are historical speeding issues on Gowerton Road and traffic calming was installed. This may need to be supplemented if further development is proposed.</p> <p><u>Accessibility:</u> The site is within 100m of an hourly bus service.</p> <p><u>Wider Issues / Combined effect:</u> Any development above one or two houses as infill will require significant improvement to Gowerton Road due to narrow sections and lack of continuous footways.</p> <p><u>Restrictions:</u> Gowerton Road is in need of improvement to accommodate anything above one or two houses.</p> <p><i>Note: comments relate to original submission for larger site (70 units compared to 15 units now proposed).</i></p>
CCS Housing	<p>The SHMA identifies the need to deliver 500 new homes within the Gower/Gower fringe strategic housing policy zones, the majority of which should be affordable housing to meet local needs.</p>

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CCS Biodiversity	This site contains potentially important Hedgerows protected under the Hedgerow Regulations (1997) and scrub. An Extended phase1 survey would need to be undertaken; a hedgerow assessment and the presence of any protected species. Important features highlighted may require further survey.
CCS Environmental Health	No comment
CCS Education	<p><u>Crwys Primary:</u> Would have sufficient places to take a small increase in pupil numbers from this development. Concern would have to be expressed over the capability of expanding the school on this constrained site. No available walking route to re-designate this school catchment</p> <p><u>Bishopston Comprehensive:</u> All developments in the catchment would take the school over its capacity. Some of the accommodation is housed within timber demountable classrooms. Highway Access to the site is of major concern and would require careful consideration of a new access in order for any expansion on the school site to be approved (recent STF planning approval had this as a condition of approval).</p>
External Stakeholder	Comments
Natural Resources Wales	Consider MOU. Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required. Boundary hedgerows contain some mature trees, which should be retained. In addition, there are some further mature trees at the northern end of the site. Mature trees should be assessed surveyed for their potential to support bats.
Dwr Cymru	<p><u>Water Supply:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> For this area, an hydraulic modelling assessment is required to establish the potential impact of the confirmed proposals on our network and to establish the extent of off-site mains required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site. The site is crossed by a water main and a WPS for which protection measures, either in the form of an easement and / or diversion may be required.</p>

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	<p><u>Waste:</u> <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>Gowerton Waste Water Treatment Works - Limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - PRUG – Unrecorded probable historic underground workings at shallow depth and mine entry in centre

Stage 3A: Assessment Against LDP Objectives

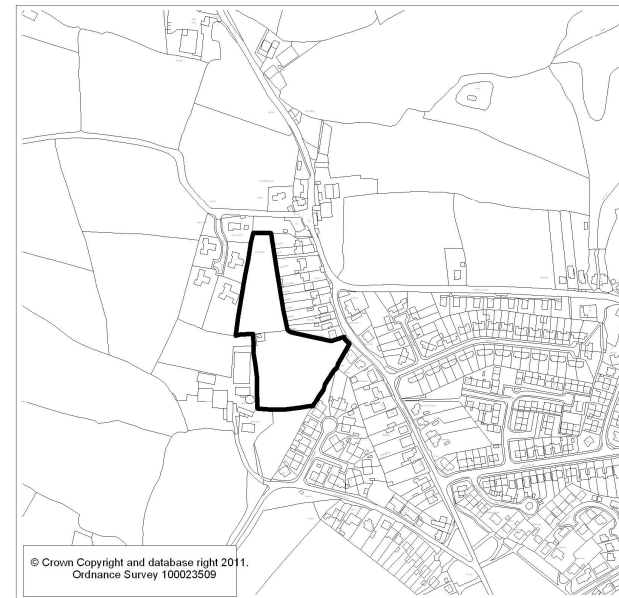
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+2	n/a	n/a	+1	n/a	n/a	-2	n/a	+1	?	n/a	n/a	n/a	+2	+2	n/a	+1	0	+1	+1	n/a	?	+1	+1

Stage 3B: Assessment Against SEA/SA Objectives

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

PLANNING COMMITTEE – 11TH JUNE 2015

Reference	FA014 incorporating FA011
Name	Land adjoining Tirmynydd Rd, Three Crosses
Description	This site which comprises two field parcels lies alongside the western edge of the Gower fringe settlement of Three Crosses outside the Gower AONB. It is a backland site to the rear of properties fronting onto Tirmynydd Road to the east and Cefn Draw to the south. To the SW is located Cefn Draw farm and outbuildings and to the NW the residential cul-de-sac of Misty Close. Therefore, although forming part of the open countryside, the site is effectively surrounded by built development. The submission incorporates candidate site FA011 which is the southern of the two fields from where access would be obtained off Tirmynydd Rd.
Size	1.4 Ha
Existing Land use	Agricultural
Proposed Land Use	Residential
Location Plans	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.

749 letters of objection were received which are summarised below:

- Borders AONB/Within AONB.
- Outside village boundary.
- Inadequate road infrastructure and site access.
- Inadequate sewerage system.
- Local schools already at capacity.
- Adverse impact on the character and amenity of the village.
- Lack of public resources e.g. medical facilities.
- Detrimental impact on the community.
- Inadequate drainage/flood risk.
- Adverse impact on wildlife/destruction of habitat.
- Highway safety.
- Unacceptable precedent.
- Adverse impact on noise pollution, light pollution and litter.
- Adverse visual impact.
- Common Land.
- Loss of agricultural land.
- Urban sprawl.
- Inadequate public transport.
- Contrary to objective of creating and maintaining sustainable communities.
- Inappropriate size and scale.
- Encroachment into open countryside.
- Public right of way crosses site.
- Possible adverse impact on crime and anti-social behaviour.
- Planning previously refused as inappropriate.
- Possible unstable land due to mine operations.

PLANNING COMMITTEE – 11TH JUNE 2015

- Loss of open space.
- Contrary to current policy.
- Adverse impact on SAC and shellfish mortality.
- Contrary to Rural Development Plan.
- Coalescence of villages. Negative impact on Burry Inlet.
- Devaluation of property.
- SSSI.

In addition to this one letter of comment was received which raised the following issues:

- Would further overstretch the infrastructure of the small village of Three Crosses, which is already experiencing significant problems with surface water drainage and sewerage.
- Would increase pressure on local schools, increase congestion on narrow country lanes and detract from the beauty and amenity of the village.

LDP Preferred Strategy Consultation: Summary of Representations

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

- Support for the identification of Three Crosses as a location for sustainable growth

1 comment which can be summarised as follows:

- Suggestion that candidate site FA007 be considered in conjunction with FA014 to avoid problems associated with housing next to a working farm

LDP Draft Proposals Map Consultation: Summary of Representations

No further comments received

Responses to Representations

- The site is outside the AONB boundary, adjacent to the village of Three Crosses. 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.
- All settlement boundaries are being reviewed as part of the preparation of the development plan.
- Development would require local highway improvements, including footways. A suitable site access could be constructed, however Highways comments state that no development other than small scale infill should take place without local highway improvements being included.
- Potential capacity constraints identified by Dwr Cymru/Welsh Water at the Gowerton Treatment Works if all candidate sites came forward. Further discussions required during the planning application stage.
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21st century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. Insufficient information to be able to comment design, size and scale of any future development. This is a matter for planning application stage. Any development would have to have regard to the AONB Design Guide SPG and need to be in keeping with context of the village, which has mixed built character, including a high density suburban estate development.
- The village has many facilities and services which smaller villages do not have, for example a primary school, village hall, shop and pub. 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
- Proposal may have a positive impact on the community by as will provide local needs affordable homes (which may include older peoples homes), enabling people to stay in their local communities who may not be able to afford market housing.
- Sustainable urban drainage scheme (SUDS) will be incorporated into any development scheme. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted.

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- 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 but this is not a constraint to development as hedgerows can be designed as part of the sites landscape.
- The release of land at this location would be as an exception, with the majority of dwellings being affordable housing. This is not a precedent for market housing.
- There is no indication of significant pollution levels as a result of the residential development proposed, the planning application process would not permit development that would result in harmful levels of pollution. Litter is not a material planning consideration.
- Insufficient information to be able to judge density, scale and visual impact at LDP allocation stage. This is a matter dealt with through the planning application process. Any development would need to be in keeping with context of adjoining development
- The site is not Common Land.
- The site is grade 3 agricultural land. There is no indication that the sites loss would undermine the viability of the farm holding.
- The site is contained within built development on the edge of the village of Three Crosses and would not extend built development beyond that which already exists and would not result in 'urban sprawl'.
- There is an hourly bus service past the site.
- The proposal is compatible with the objective of creating and making sustainable communities, as it is providing affordable housing where there is need and in an area which has sufficient facilities and services to support small population growth, helping to ensure the long term viability of services.
- The PROW will be accommodated within any new development.
- Any new development would be built to design out crime in accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- 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.
- A ground condition survey would be undertaken as part of any planning application submitted.
- The site is not public open space and its loss would not result in a deficit of public open space in Three Crosses.
- Any impact on the Carmarthen Bay Estuary European Marine Sites would be assessed throughout the plan preparation process via the HRA of the LDP and during the planning application stage. The site itself is not a SSSI, nor a SAC and NRW have not identified any issues with this proposed allocation.
- The Rural Development Plan supports the provision of local needs affordable housing.

PLANNING COMMITTEE – 11TH JUNE 2015

- Devaluation of property is not a material planning consideration.
- The LDP seeks to safeguard against coalescence and development must respond to the character of existing settlements. The proposed site does not extend any nearer to neighbouring settlements than the existing built form of the village

Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> A suitable access could be constructed.</p> <p><u>Local Highway Conditions:</u> Tirmynydd Road is in a rural location with limited provision of footways. It will not accommodate a significant increase in traffic in its present condition.</p> <p><u>Accessibility:</u> There is a limited 1 hour service past the site.</p> <p><u>Wider Issues / Combined effect:</u> There is a lack of footway provision in the area as it is a rural location. Significant development will require more urban facilities such as footways particularly on the route leading to the local school.</p> <p><u>Restrictions:</u> No development other than small scale infill should take place without local highway improvements being included.</p> <p><u>Transport Proposals:</u> There are no transport proposals currently.</p>
CCS Housing	There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. There is a need for up to 500 affordable homes within the Gower/ Gower Fringe strategic housing policy zone
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 comment
CCS Education	<u>Crwys Primary:</u> Would have sufficient places to take a small increase in pupil numbers from this development. Concern would have to be expressed over the capability of expanding the school on this constrained site. No available walking route to re-designate this school catchment

PLANNING COMMITTEE – 11TH JUNE 2015

	<p><u>Bishopston Comprehensive</u>: All developments in the catchment would take the school over its capacity. Some of the accommodation is housed within timber demountable classrooms. Highway Access to the site is of major concern and would require careful consideration of a new access in order for any expansion on the school site to be approved (recent STF planning approval had this as a condition of approval).</p>
External Stakeholder	Comments
Natural Resources Wales	<p>Gowerton STW. Capacity issues and potential to impact on Carmarthen Bay SAC. Further consultation with DCWW strongly recommended. Compensatory surface water removal may be required.</p> <p>Mature trees form part of the hedgerow boundaries which surround the site. These should be safeguarded to retain connectivity, with a suitable buffer. A PRow crosses the southern section of the site</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>

PLANNING COMMITTEE – 11TH JUNE 2015

	<p><u>Site Specific Comments on the Draft Proposals Map</u>: No problems envisaged with the public sewerage system for domestic foul flows from this proposed development site.</p> <p>The site is crossed by a public sewer for which protection measures, either in the form of an easement and/ or diversion may be required.</p> <p>Gowerton - limited capacity</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy – PRUG unrecorded probable historic underground workings at shallow depth

Stage 3A: Assessment Against LDP Objectives

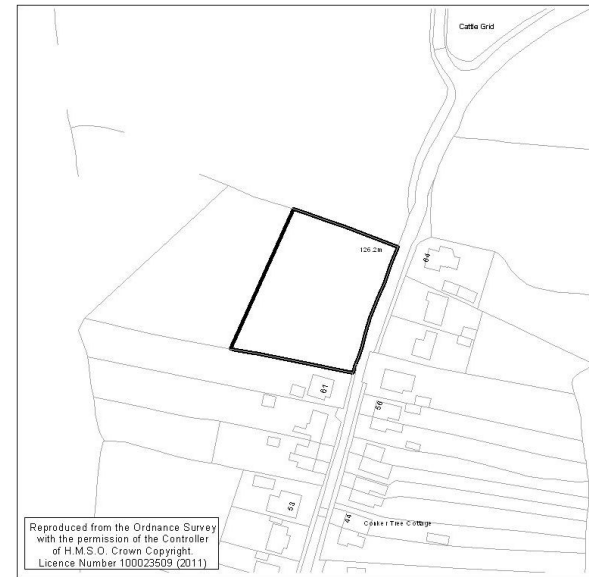
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Score	+1	n/a	n/a	+1	n/a	?	-1	n/a	+2	n/a	n/a	n/a	n/a	+2	-1	0	-2	0	-1	-1	n/a	?	+1	+1

Stage 3B: Assessment Against SEA/SA Objectives

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

PLANNING COMMITTEE – 11TH JUNE 2015

Reference	FA019
Name	Northern end of Gowerton Road, Three Crosses
Description	A small frontage plot on the northern edge of the Gower fringe settlement of Three Crosses. The site is situated on the western side of Gowerton Road, adjacent to the last of the frontage properties on that side, but opposite the last three dwellings on the eastern side of the road which extend further to the north. The site is not currently in use and is isolated from the surrounding countryside by the Gower Golf Club which immediately abuts the site to the north and west. Only half the site is put forward as an extension to the settlement boundary to allow small scale infill and rounding off. Only 1 dwelling is proposed associated with employment at the Golf Club. The site is too small to be treated as an allocation. Previous applications for a dwelling for a golf course manager on this site have been refused
Size	0.361 Ha
Existing Land use	Undeveloped Land
Proposed Land Use	Residential
Location Plans	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.

492 letters of objection were received which are summarised below:

- Inadequate road infrastructure.
- Highway safety.
- Adverse impact on noise pollution.
- Inadequate water and sewerage systems.
- Adverse visual impact.
- Development outside village boundaries.
- Destruction of natural habitat and loss of wildlife.
- Loss of agricultural land.
- Local schools already at capacity.
- Adverse impact on character and amenity of village.
- Adverse impact on AONB.
- Green Wedge.
- Would constitute ribbon development.
- Lack of local services e.g. medical facilities.
- Possible adverse impact on crime and anti-social behaviour.
- Affordable housing not appropriate in village - better suited to more urban areas.
- Contrary to Gower AONB Design Guide.
- Urban sprawl.
- Inadequate drainage/flood risk.
- Inadequate public transport.
- Unacceptable and undesirable extension of existing frontage development.
- Would not provide affordable housing.
- Encroachment into open countryside.
- Contrary to current policy.
- Adverse impact on tourism and local economy.

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- Coalescence of villages.
- Contrary to Rural Development Plan.
- Inappropriate size and scale.
- Devaluation of property.
- SSSI/SAC

In addition to this, one letter of support was received from the site promoter which is summarised below:

- Application is for one dwelling for one single village resident.
- Closely linked to the business at Gower Golf Club and would enable the business to continue growing and attracting new expenditure into the area.
- The Green Wedge and village envelope can be extended to create a small scale rounding off on Gowerton Road to a clearly defined boundary which would prevent further development and be of no detriment to the amenity of the village and local landscape.
- The principles of allowing housing to assist golf development is tried and tested in Swansea

Response to Representations

- Any development above one or two houses as infill will require significant improvement to Gowerton Road due to narrow sections and lack of continuous footways. The road is rural and not suitable for significant development traffic. Additional traffic calming measures will be required.
- There is no indication that significant pollution levels would arise as a result of the residential development proposed, the planning application process would not permit development that would result in harmful levels of pollution.
- An hydraulic modelling assessment is required to establish the potential impact on the network and to establish the extent of off-site mains required. The site will drain into the Gowerton Waste Water Treatment Works and future investment may be required.
- Insufficient information to be able to judge visual impact at LDP allocation stage. This is a matter dealt with through the planning application process. Any development would need to be in keeping with context of adjoining development
- All settlement boundaries are being reviewed as part of the preparation of the development plan.
- An extended phase1 habitat survey is required but no significant constraint to development identified at this stage. The site is grade 3 agricultural land. There is no indication that the sites loss would undermine the viability of an agricultural holding.

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- Single dwelling would have no material impact on school capacities
- The site is located outside the AONB.
- Upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions, e.g. current UDP Inspector's findings, are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016.
- The proposal would not extend the built form beyond that which already exists on the eastern side of the road, providing a logical limit to the built form and would not result in 'urban sprawl' or lead to a coalescence of settlements.
- It is bounded by the golf course which prohibits further expansion and would not set a precedent for further releases of this nature. There is no rear defensible boundary to the site and this would need to be established on the ground and defined by the LDP Proposals Map
- The village has many facilities and services which smaller villages do not have, for example a primary school, village hall, shop and pub. 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
- Any new development would be built to design out crime in accordance with the Council's Planning for Community Safety SPG <http://www.swansea.gov.uk/spg>
- Insufficient information to be able to comment design, size and scale of any future development. This is a matter for planning application stage. Any development would have to have regard to Places to Live Residential Design Guide SPG (the AONB Design Guide applies to the AONB only) and will need to be in keeping with context of the village
- No flood risk issues have been identified. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- The site is within 700m of an hourly bus service
- Proposal would have no impact on tourism and may have a positive impact on the local economy by providing accommodation to serve the Golf Club
- The Rural Development Plan supports the provision of affordable housing in rural area.
- Devaluation of property is not a material planning consideration.
- The site itself is not a SSSI or a SAC.

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Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: A new access could be constructed to the site.</p> <p><u>Local Highway Conditions</u>: There are historical speeding issues on Gowerton Road and traffic calming was installed. This may need to be supplemented if further development is proposed.</p> <p><u>Accessibility</u>: The site is within 700m of an hourly bus service.</p> <p><u>Wider Issues / Combined effect</u>: Any development above one or two houses as infill will require significant improvement to Gowerton Road due to narrow sections and lack of continuous footways. Dunvant Road is rural and not suitable for significant development traffic.</p> <p><u>Restrictions</u>: Gowerton Road is in need of improvement to accommodate anything above one or two houses. Dunvant Road is not suitable to accommodate significant traffic increases.</p> <p><u>Transport Proposals</u>: No transport proposals currently</p>
CCS Housing	There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies the need to deliver 500 new homes within the Gower/Gower Fringe strategic housing policy zones, the majority of which should be affordable housing to meet local needs
CCS Biodiversity	The area is covered by scrub and grassland, which may fall into a SINC. An extended phase1 habitat survey would need to be undertaken including; habitat type and species lists and the presence of any protected species. Important features highlighted may require further survey.
CCS Environmental Health	No comment
CCS Education	No comment
External Stakeholder	Comments
Natural Resources Wales	No comment
Dwr Cymru	<p><u>Water Supply</u>:</p> <p>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>

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	<p><u>Waste:</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>
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 comment

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

Stage 3B: Assessment Against SEA/SA Objectives

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