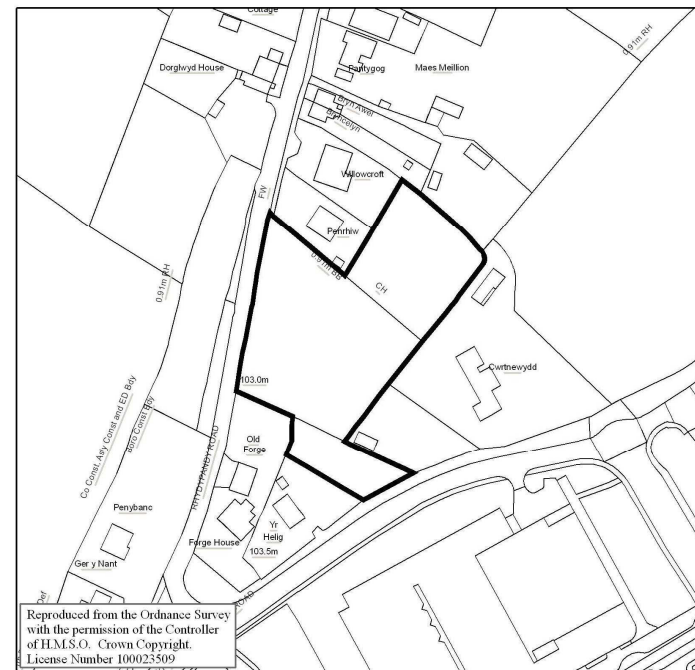


<b>Reference</b>	<b>MR011</b>
<b>Name</b>	<b>Land at Rhyd y Pandy Road, Pantlasau</b>
<b>Description</b>	3 irregular shaped agricultural fields fronting onto Pant Lasau Road and Rhyd-y-Pandy Road. This level site is surrounded by residential properties and by Morrision Hospital further to the south.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



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

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

No petitioners

15 letters of objection were received which are summarised below:

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

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

No comments were received specifically regarding this site

## LDP Draft Proposals Map Consultation: Summary of Representations

No comments were received specifically regarding this site

## Response to Representations

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

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



## Key Stakeholder Consultations

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

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

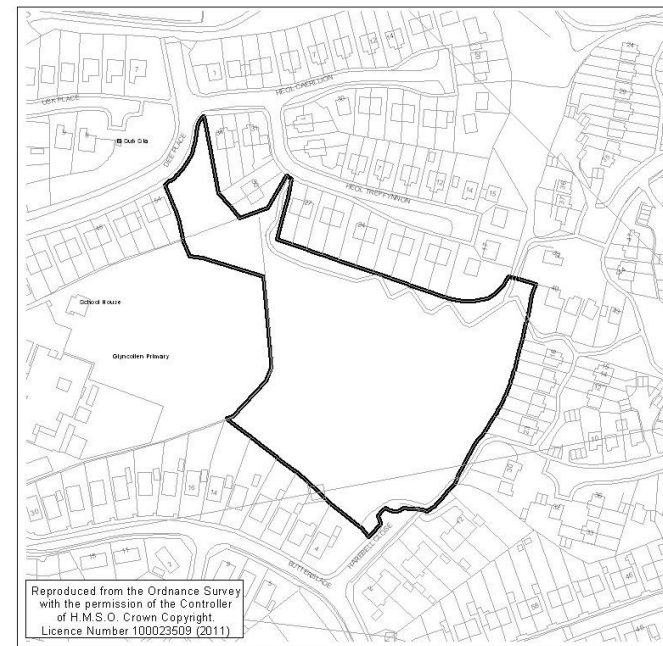
### Stage 3A: Assessment Against LDP Objectives

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

### 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	+	?	?	--	+	?

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



## Candidate Site Public Consultation: Summary of Representations

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

No petitioners

45 letters of objection were received which are summarised below:

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

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

1 letter of support was received which is summarised below:

- Would welcome affordable housing

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

No comments were received specifically regarding this site

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

1 letter of objection was received which is summarised below:

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

### **Response to Representations**

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

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



## Key Stakeholder Consultations

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

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

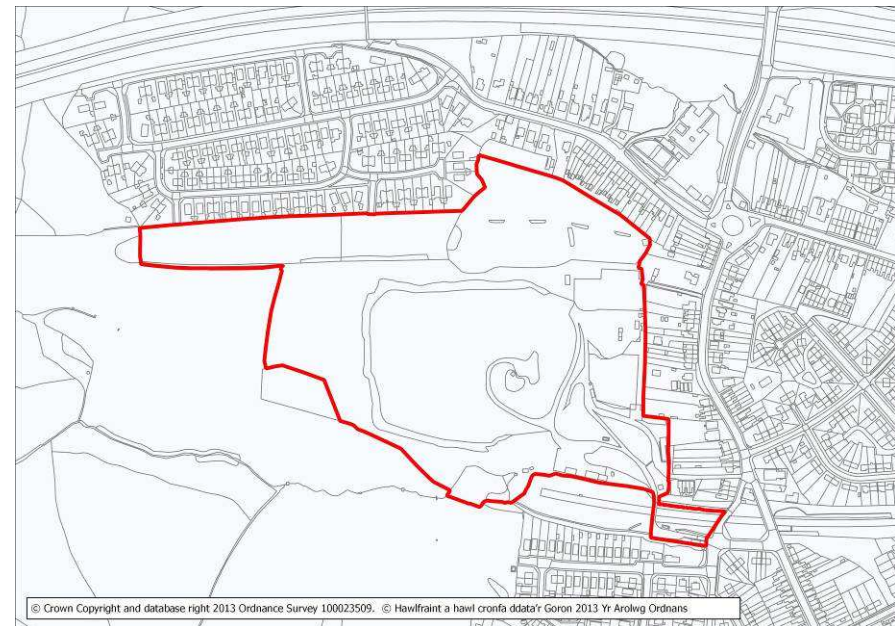
### Stage 3A: Assessment Against LDP Objectives

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

### 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	+	?	?	++	?	?

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



## Candidate Site Public Consultation: Summary of Representations

**MR009:** The Candidate Site application was advertised on site in the form of site notices.

6 letters of objection were received which are summarised below:

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

**MR010:** The Candidate Site application was advertised on site in the form of site notices.

5 letters of objection were received which are summarised below:

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

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

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

No comments were received specifically regarding this site

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

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

No petitioners

1 letters of objection received which is summarised below:

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

### **Response to Representations**

- Site is not green wedge, it forms part of the existing urban settlement
- Site is white land in the UDP i.e. potentially available for development but awaiting constraints associated with adjoining quarry to be overcome- would need to be addressed as part of any development proposal

- Any potential safety issues with the redevelopment of the quarry will be dealt with at the planning application stage and would be endorsed by all of the statutory undertakers



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

## Key Stakeholder Consultations

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

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

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

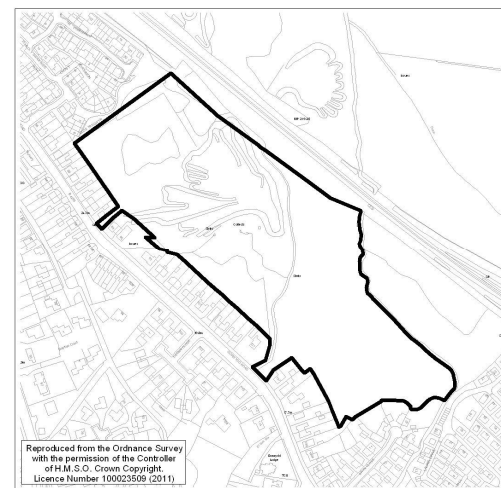
### Stage 3A: Assessment Against LDP Objectives

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

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

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

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



## Candidate Site Public Consultation: Summary of Representations

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

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

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

17 letters of objection received on the following grounds:

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

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

2 letters of comment received:

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

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

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

## LDP Draft Proposals Map Consultation: Summary of Representations

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

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



## Response to Representations

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

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

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

### Special Planning Committee 04/06/15 - Petitions

#### **Petitioner: John Higgon**

*I am here today to raise our objections to the development of the above site in conjunction with Councillor Sue Jones and show how the development will have an adverse effect on the infrastructure and the wellbeing of the community of Gowerton.*

*Gowerton is subject to intense development pressure due to its Gower fringe location. If the character of this village and the wider area is to be maintained and protected, residential development such as this needs to be resisted. The site forms part of Gowerton Mart Woodlands, the trees have a Tree Protection Order and is a SINC (site of importance for nature conservation) and is currently identified as part of the Llan Valley Green Wedge, as identified in the Unitary Development Plan 'UDP'. Unfortunately all existing*

*policies and previous decisions are subject to review in 2016 including the Green Wedge and it appears that there will no longer be a constraint for the development of this land. The previous Lliw Valley Authority identified these areas for conservation and enhancement for the sake of its natural heritage and resources. The removal of this status should be resisted. This site has previously been rejected on 2 occasions by the Lliw Valley Authority and the Swansea City Council for development. Planning Policy Wales is particularly clear to offer protection for woodland.*

- *Trees, woodlands and hedgerows are of great importance, both as wildlife habitats and in terms of their contribution to landscape character and beauty. Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality. Ancient and semi natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage.(Para 5.2.8)*

#### *Loss of Woodland*

*When considering the loss of woodland to development in Gowerton we must consider the other Gowerton Candidate Site and the Waunarwydd \ Fforestfach Strategic Development Area:*

- *GT0005 Former Cefn Gorwydd Colliery, Gorwydd Road.*
- *GT0006 Land east of Fairwood Terrace, Gowerton.*
- *Land 'North of Gowerton Railway Station, Park and Ride and Residential Development'.*

*The loss of woodland from each site would be as follows:-*

*GT0005 Former Cefn Gorwydd Colliery, Gorwydd Road. Loss 2.66 Hectares.*

*GT0006 Land East of Fairwood Terrace, Gowerton, Loss 1.14 Hectares.*

*'North of Gowerton Railway Station, Park and Ride, Loss 2.50 Hectares*

*Total Loss of Woodland 6.30 Hectares*

*Additional loss of woodland due to roads / cycle paths for access to these sites has not been considered. All the three sites are interlinked and comprise of semi-natural broadleaved woodland comprising of sessile oak, silver birch, ash, hawthorn, holly, hazel and goat willow. The woodland protects the environment and wildlife interests in the area and its loss would greatly affect the bio diversity of this area of Gowerton.*

### Practical Assessment including photographs (pics)

*Pic 10 highlights the proposed development: The proposed site is littered with historic shallow mine workings and whilst biodiversity has reclaimed much of this area the site clearly has significant historic industrial constraints with respect the re-development of the site. Planning Policy Wales and Welsh Government Guidance requires Local Planning Authorities to only allocate sites which are realistically capable of being developed and delivered within the plan period. It is unclear at this point if any geotechnical ground investigations have been carried out on site, however one would assume the cost of remediating the land to ensure the site is capable of being developed would be significant which raises the question whether the site would be commercially viable to develop and whether it is feasible at all? Welsh Government Guidance clearly states that Local Planning Authorities should not allocate sites such as this for development which have no realistic prospect of being built out.*

*Access to the Gorwydd Colliery Site is next to 121 Gorwydd Road. Within 10 metres of the site entrance we encounter a mature ash tree (pic 1) and this is followed by mature oak and birch trees (pic 2, 3, 4, 5.). An approximate total of 50 mature trees would have to be removed to accommodate the road access alone to the site. This figure does not account for saplings. The larger area of land for roads and the housing development (pic 6, 7, 9.) would necessitate further substantial loss of trees including mature oaks to a figure in the hundreds. The stream (pics 8) has not been mentioned in the report and runs into Gors Fach Brook. The development plan highlights two very small strips of land for mitigation; 'areas of land with potential for possible tree planting' in reality the vast majority of trees will be lost and not replaced. The woodland has a wonderful array of wildlife and although is not an ancient woodland it supports an 'assemblage of ancient woodland indicators species and diverse scrub'. Wet woodland is a habitat of principle importance for the conservation of biological diversity in Wales. Species recoded on the site include Bullfinch, Goldcrest, Spotted Woodpecker, Jays, Marsh Tit, Nuthatch and Bats. The identified area for development includes plants and trees that are essential early pollinators. The loss of this area will greatly affect the bio-diversity of this green field site.*

### Surface Water and the flood plain

*The site also has major surface water problems which would have to be addressed through attenuation or some sort of other system which is again very costly as the site acts as a giant soakaway for the village of Gowerton. If we consider that an oak tree consumes 50 gallons of water / day, the loss of a substantial area of woodland and the construction of the housing development would result in a large increase in surface water. The increase in surface water would have a detrimental effect on the flood plain boundary. There is mounting evidence that the global climate is changing as a result of human activity. Flooding is expected to increase significantly over time. Heavy winter precipitation of rainfall is likely to become more frequent. Relative sea levels will continue to rise around most of the UK's shoreline expecting extreme sea levels to be experienced more frequently. This places the respective residential area at risk to flooding in the foreseeable future. The north east section of GT0005 Former Gorwydd Colliery is identified as a flood plain and will be subjected to the same projected expansion.*

### Gowerton Water Treatment

*Surface water would drain into the Gowerton Water Treatment catchment area which is currently at capacity. A 'Site Specific Comment from 'Welsh Water' identifies that due to 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 this site, notwithstanding the other candidate site and the site North of Gowerton Station Park and Ride. The result would not only add an unsustainable amount of foul water into the already congested sewerage network but would also seriously result in additional water run-off into the Burry Inlet. The Burry Inlet and Loughor Estuary is an internationally protected site of the highest quality. It is part of a network of important European sites designated under the European Union Habitats and Birds Directives. The Burry Inlet is also designated Special Protection Area (SPA) and the Carmarthen Bay and Estuaries is a Special Area of Conservation (SAC).*

*The effect of the loss of woodland would result in an increase in noise pollution*

*The loss of 40% of the woodland including some of the large mature oak tree will increase noise pollution for the existing residents of Gowerton. Currently the woodland acts as a sound barrier from the noise generated by the railway line, now a two track system and industry from the IMCO / Timet site, Waunarwydd (heard clearly in the night). The role of the woodland was a serious consideration in the planning application of IMCO.*

*The effect of the loss of woodland would result in an increase in air pollution.*

*Increase in population would result in an increase in road traffic, congestion and air pollution. Trees help improve air quality, filtering out pollutants that can cause and exacerbate conditions such as asthma. Trees can also help to keep towns and cities cool, reducing ground level ozone, which also exacerbates respiratory conditions. Consequently the loss of the woodland could have an adverse effect on the health of the residents of Gowerton and increase demand on the GP Services. Demand on the GP services would also increase with additional residential developments.*

### Light pollution

*Light pollution from street/houses substantially affects the behaviour of bats, moths and birds resulting in the decline of these species.*

### Effect on Gowerton Medical Practice

*The development of the both candidate sites would result in an increased pressure on services provided at the Medical Practice.*

*Current patient population of 12,800 patients. Since 2005 to there has been a 7 % increase in patient population. The population comprise of:*

- Up to 65 years of age - 77 %*
- Over 65 years of age - 23%*
- Under 5 years of age - 5%*

*There is a high concentration of nursing home patients from four Nursing Homes presenting with complex needs and daily contact. Currently the Practice is in the process of integrating the patient population of the GP practice of Dr Werner in Penclawdd with an additional patient population of 1,800 patients.*

*Total patient population of the Gowerton Practice is 14,600*

*Practice Area extends to Llanrhidian / Crofty - Loughor / Gorseinon - Fforestfach Waunarlwydd & Killay / Dunvant*

*Practice comprised of 8 doctors – 3 Full Time, 5 part time with the Full Time Equivalent of 6.5 doctors,*

*Waiting times for routine appointments 2 – 3 weeks depending on the time of year*

#### *Constraints on the Medical Practice*

- Acute shortage of rooms to provide health care services i.e. Health Visitors / Midwives / Counselling / MH assessments and Child and Asthma Clinics*
- Parking 56 parking spaces with 13 designated parking spaces for surgery staff, overspill of parking already in the Elba Housing estate.*

*Swansea County Council have adopted a policy on Green Infrastructure and conservation. As part of their Local Development Preferred Strategy Document:*

#### *Policy 5: Green Infrastructure*

*Green infrastructure will be provided through the protection and enhancement of existing green spaces and the green corridors that connect them.*



## **Key Objectives:**

- *Maintain and enhance green infrastructure networks*
- *Conserve and enhance the County's natural heritage*
- *Create environments that encourage and support good health and well-being*

*The residents of Gowerton are becoming more and more frustrated by the increase in congestion and delays on the roads with the subsequent increase in pollution with the further demands on the schools and the medical practice. They also feel exacerbated by what they describe as the disregard by the authority to their genuine concerns. "We are not being listened to".*

### ***Bermondsey, Spa Park, Plaque to commemorate the Counsellors in 1922***

*The inscription entitled 'Tree of Heaven can be found in the park.*

*'This tree is dedicated to the Bermondsey Counsellors who lined the streets with 'Trees of Heaven' to ease the effect of poverty on health and the quality of life and to the working class communities who withstood much hardship with great fortitude.*

*We need to take that same lead and reject this development and save our woodland.*

## **Site promoter: Philippa Cole**

*The former Cefn Gorwydd Colliery is located between Gorwydd Road and the railway line in Gowerton. Residential development borders the site on three boundaries.*

*The site comprises 6.5 Ha and directly abuts the adopted Gowerton settlement boundary. The site is highly sustainable in transportation terms. Bus stops are located 200m from the site on Gorwydd Road and Gowerton Station is 700m to the north of the site.*

*The site is privately owned and contains no public rights of way. This is evidenced in correspondence from my client's solicitors Eversheds and provided to the Council.*

*The proposal is to develop 2.3 Ha of the total site for housing (approximately 35% of the site) creating between 90 and 100 new homes whilst retaining the balance circa 4.3 Ha (65% of the site area) (comprising woodland) as a nature conservation area in part and part publically accessible forest walkways"*

*In this respect the Pre Deposit Draft LDP Proposals Map (looked at in isolation) is misleading as it appears to suggest that the entire site will be developed for housing which has never been the intention.*

*The site has been the subject of extensive ecological surveys over the past year and the proposals to develop part of the site have had regard to the findings of those surveys.*

*The creation of the nature conservation area and its future management for conservation purposes would be funded by the residential development of part of the site. A scheme of appropriate management will be agreed with the council having regard to professional advice of ecologists and arborists and would be legally binding.*

*The creation of this facility would be at no cost to the public purse and would be made accessible to the wider community through the creation of appropriately designed footways.*

*The site will also be made safe. At present there are uncapped mine shafts on site as well as the former colliery chimney which is structurally unsound. As part of the overall development the mine shafts will be filled and capped and the chimney made safe and retained as a reminder of the sites industrial past.*

*4.3 Ha of the site are covered in colliery waste. It is not proposed to remove any colliery waste other than where it is necessary to allow access to the site and where necessary to link its western and eastern parts.*

*Part of the site is subject of woodland TPO. The majority of built development will be on land that is not subject to this categorisation. However, it will be necessary to develop in parts of the site which do carry this designation. The site has been the subject of tree surveys and the proposals will retain the good quality oak, ash and birch. The 2.3 Ha of land that are proposed to be developed are substantially level and whether inside or outside of the woodland TPO contain trees of substantially poor quality with some basal decay, liability to structural failure , partially collapsed and heavily colonised by ivy.*

*The green backdrop to Gowerton that the woodland on the elevated part of the site provides will be unaffected.*

*All other technical issues including access, drainage, pollution, schools and other local services would be addressed as part of a planning application process. Welsh Water has confirmed that drainage and sewage capacity is available. The professional advisors to the site owners have indicated that these issues are capable of resolution and nothing has been raised through the assessment of the Candidate Site Submission by professional officers of the council which dispute this.*

*In summary, this highly sustainable site close to amenities and local transport facilities can deliver 90 -100 new homes in the short term. A balanced approach to development is proposed. Approximately 35% of the site area is proposed for much needed residential development whilst the remainder will be retained, improved and managed as a nature conservation area providing an accessible community resource at no cost to the public purse.*

## **Special Planning Committee 04/06/15 - Petitions**

### **Councillor Sue Jones**

#### ***Limited infrastructure in the village:***

##### ***Schools***

- 1. The Primary School being built at the moment is in accordance to the present pupil number.*
- 2. There has been an increase in numbers for the nursery intake from 45 pupils to 54 pupils for the 2015 intake already.*
- 3. Any increase in pupil numbers would mean an extension on a new build.*
- 4. Both Senior Schools would exceed their current capacity which would affect the quality of education on both sites. The wellbeing of pupils would be compromised. Ysgol Gyfun Gwyr is about to acquire the Infants site to accommodate present numbers. Numbers of pupils will be limited because of the impact on the village.*
- 5. Gowerton Comprehensive has a number of demountable classrooms which are not fit for purpose at the moment with no indication of funding being made available.*
- 6. There are two Comprehensive Schools established in the village which brings a greater amount of traffic.*

*Further Objections to the inclusion of the former Cefn Gorwydd Colliery off Gorwydd Road, Gowerton onto the Local Development Plan.*

##### ***Traffic:***

- 1. There have been two access points identified both of which taper into small space for access onto an already busy highway.*

2. *Gorwydd Road is the main access road connecting Gowerton and Waunarlwydd and is therefore very extensively used with a high volume of traffic, with excessive speed being identified by the number of complaints at the local Pact Meeting and the need for me to purchase a Speed Indicator Device from my environment money.*
3. *There have been traffic modifications placed on Gorwydd Road over the past year, central reservations placed at intervals to allow pedestrian to cross the busy road. The new initiative of an average speed cameras from Gowerton to Llanrhidian is part of the overall scheme from Cockett Station through Waunarlwydd, Gowerton and North Gower. ( funding from Welsh Assembly to reduce the speed)*
4. *I have been communicating with the Highway Department regarding making safer access onto Gorwydd Road from existing roads and estates – e.g. a roundabout at the bottom of the Bishwell Estate. Also Speed Indicator Devices have been in position at times near the Bishwell to monitor the speed of the traffic. Our Local Policing Team has also carried out speed camera projects on this road.*
5. *Highways have indicated that the site could promote non –car usage, we all know that this is pie in the sky. You only have to look at Drovers Point to have evidence that this does not work.*
6. *Gowerton is the cross roads to Waunarlwydd, Dunvant, Penclawdd and Gorseinon and is often on standstill for periods of time especially during rush traffic time.*
7. *Gowerton has three Schools on 4 sites at the moment which generates a high capacity of traffic. Gorwydd Road has extensive parking problems when School finishes at the end of the day with parents from the Comprehensive School parking on Gorwydd Road rather than drive through the congested village.*
8. *Gorwydd Road is the route for H.G.V transport to North Gower because of the height restrictions at the railway bridge near the rugby club.*

*I would like to ask when the traffic management assessment was completed – was it at school holiday time????*

*I would also challenge the statement by the Council's Senior Assistant Engineer "The traffic assessment submitted for Gorwydd Road is acceptable in principle". We already have many problems without this new development.*

*To finish my statement I would like you to consider the effect of this development on our village. The environmental issues have been emphasised by John Higgon and we would like to emphasise these. The woodland area should be allowed to become an Ancient Wood with all the protection we can offer. When this area is destroyed we would be unable to ever replace for future generations. The infrastructure of our village would be unable to cope with the extra residents wanting to use the schools, our*

already over loaded doctors surgery and services and our roads are at capacity. This development would alter the character and overload services for our village.

## Key Stakeholder Consultations

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

	<p><i>5.6 In addition, it has been demonstrated that the junction provides sufficient capacity to accommodate the predicted demand from future development on this site.</i></p>
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	<p><i>5.7 Moreover, an additional point of access to the development will be provided at the north westerly part of the site. This will provide for pedestrians and cyclists and will act as a secondary point of access for emergency vehicles should one be required subject to the density of the site.</i></p> <p>The technical note was made available to the Council's Senior Assistant Engineer in Feb 14 who confirmed that</p> <p><i>"The traffic assessment submitted for Gorwydd Road is acceptable in principle but there may still be a need to supplement safety enhancements in the area due to additional traffic generation by the development."</i></p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 4,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>Contains Lowland Mixed Deciduous Woodland supporting an assemblage of ancient woodland indicator species and Diverse scrub. Wet Woodland is a habitat of principal importance for the conservation of biological diversity in Wales under NERC. Species recorded; Bullfinch, Herring gull, House sparrow, Marsh tit, Song thrush are species of principal importance for the conservation of biological diversity in Wales under NERC. Recorded species of medium conservation concern; Woodcock and Goldcrest.</p>
CCS Environmental Health	<p>Residential / Nature Conservation / Open Space: overlays site 010 Gorwydd Colliery: site investigation condition</p>
CCS Education	<p><u>Gowerton Primary</u>: There is no particular concern in respect of these proposed sites as there is sufficient capacity within the primary school overall, however the school is currently based over 3 sites and some of capacity is within timber demountable classrooms. Note however that this school currently features as a priority within the 21st Century Schools Programme for rebuild on a new site. Depending on when these sites came forward, some remodelling works may be required on the existing sites and further consideration to a bigger replacement school. There is concern on the impact on highways around existing school sites.</p>

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



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

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

### Stage 3A: Assessment Against LDP Objectives

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

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

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



Original candidate site boundary.



## Candidate Site Public Consultation: Summary of Representations

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

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

No petitioners

15 letters of objection were received which are summarised below:

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

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

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

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

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

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

1 letter of support was received

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

## **Response to Representations**

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

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

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

## **Special Planning Committee 04/06/15 - Petitions**

### **Councillor Sue Jones**

Same objections as GT005 regarding local school capacities



## Key Stakeholder Consultations

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

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

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

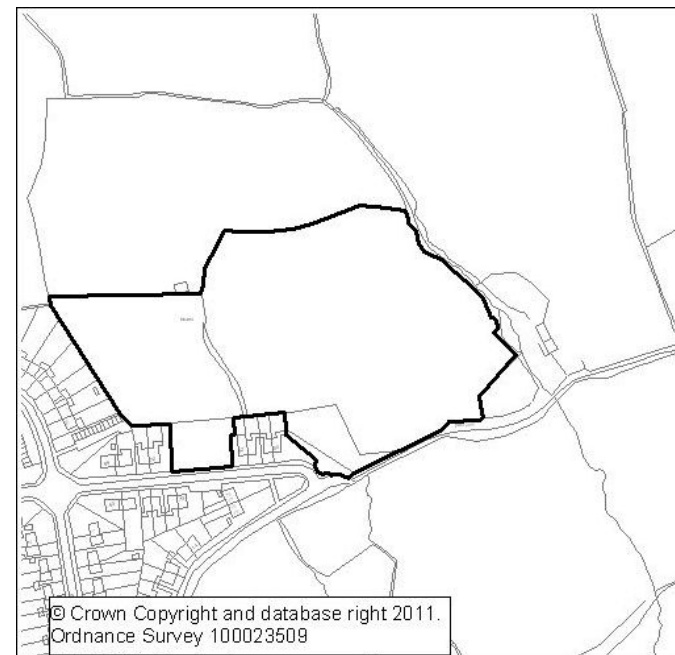
### Stage 3A: Assessment Against LDP Objectives

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

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

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

<b>Reference</b>	<b>CL008</b>
<b>Name</b>	<b>Land at Tanycoed Road, Clydach [CCS Site]</b>
<b>Description</b>	Two fields of open grassland adjoining NE boundary of settlement. Land slopes down from north to south. Two potential access points off existing highway. Well screened around site boundaries. Abutting existing residential properties to SW and surrounded by open countryside on all other sides
<b>Size</b>	2.48 Hectares
<b>Existing Land use</b>	Open grassland
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



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

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

No petitioners

3 letters of objection received:

- Inadequate sewerage system
- Adverse impact on wildlife and loss of habitat
- Public right of way
- Inadequate drainage, would exacerbate current issues
- Possibly overlooking
- Devaluation of property

No letters of support/comment received

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

No comments were received specifically regarding this site.

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

No additional comments received

### **Response to Representations**

- There is sufficient sewerage capacity, but water supply improvements required
- Further ecological assessment to be undertaken but no fundamental constraints identified
- No public right of way through the site

- 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

- Distances between dwellings and appropriate mitigation will be dealt with at the planning application stage
- Devaluation of property is not a material planning consideration

## Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access</u>: Access could be gained from Tanycoed Road</p> <p><u>Local Highway Conditions</u>: Roads leading to the site are substandard in width and are further limited by on street parking.</p> <p><u>Accessibility</u>: The site is over 140m from a 30 min frequency bus route.</p> <p><u>Wider Issues / Combined effect</u>: Concern with regard to additional traffic movements along these substandard roads.</p> <p><u>Restrictions</u>: The site is not suitably served by the surrounding road network and any development needs to be restricted to very small scale infill development only.</p>
CCS Housing	<p>Site proposed by Housing Enabling Team</p> <p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 4,200 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site contains Lowland Meadow, Diverse scrub and potentially important hedgerows. Lowland Meadow is a habitat of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p>
CCS Environmental Health	<p>No issues identified. No land contamination. Beyond Inco hazardous installation consultation zone</p>
CCS Education	<p>Ward profiles indicate surplus capacity in all local schools apart from catholic faith school. However education advise:</p>



	<p><u>Clydach Infants &amp; Juniors</u>: Having recently amalgamated the Infant and Juniors, to take effect from Sept 2012, there is limited scope to increase the capacity of the school due to location and concerns over access.</p> <p><u>Birchgrove Comprehensive</u>: There is surplus capacity at the school to take increased pupils; however, the school is currently under review as part of the Secondary Stakeholder Forum.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Site outside of sewered area but closest connection Swansea Bay STW.</p> <p>Probably BAP Habitat. Valuable for connectivity. Boundary features should be protected. Ditches &amp; streams present. Buffer zones should be maintained and no culverting of watercourses. The Phase 1 data classifies the land as semi-improved grassland. Aerial photographs show the boundaries of mature hedgerows and scrub.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: Generally the local water supply network for this ward is suffice to meet the projected growth promoted. However, the area around site ref CL002 is served via a water pumping station and this would need to be upsized to meet the additional demands.</p> <p><u>Site Specific Comments on the Draft Proposals Map</u>: A water supply can be made available to service the proposed development site.</p> <p><u>Waste</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: Proposed developments in this ward ultimately drain to our Swansea Bay Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 40,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time.</p>

	<p><u>Site Specific Comments on the Draft Proposals Map</u>: 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 this site. A hydraulic modelling assessment will be required to understand the point of connection and/ or any potential improvements required.</p> <p>Swansea Bay Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No mining operations in vicinity. No coal mining legacy features identified by the Coal Authority.

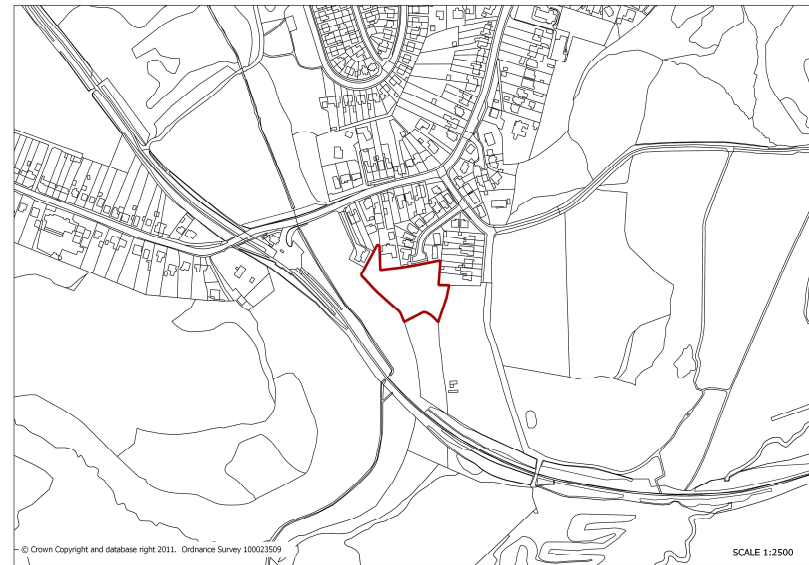
### Stage 3A: Assessment Against LDP Objectives

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

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

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

<b>Reference</b>	<b>KS001</b>
<b>Name</b>	<b>Land off Rowan Close, Killay</b>
<b>Description</b>	Small irregular shaped parcel of land currently used for grazing located off the southern end of Rowan Close. It is the eastern portion of much larger site (KS001a) originally proposed for development which included a large area of Clyne Valley Country Park. The site slopes down from east to west and is bounded by mature woodland to the south and west and residential development to the north
<b>Size</b>	0.53ha
<b>Existing Land use</b>	Grazing Land
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



## Candidate Site Public Consultation: Summary of Representations

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

1 x 460 signature petition and 1x 975 signature petition of objection were received which are summarised below (NB all comments relate to wider area KS001a)

- Loss of woodland
- Adverse impact on wildlife/loss of habitat
- Green wedge
- Inadequate local infrastructure and resources
- Loss of green space
- Loss of recreational space
- It is a link from the foreshore into the countryside forming a natural wildlife corridor
- Historical value
- Contrary to current policy
- Local schools at capacity
- Adverse impact on tourism
- Would destroy a 'green lung'
- Flood risk
- Retain its status as green wedge/Clyne Country Park

1158 letters of objection were received which are summarised below:

- Within Clyne Valley Country Park
- Loss of green belt
- Unacceptable precedent
- Loss of recreational space
- Inadequate road infrastructure to accommodate increased traffic
- Loss of open space
- Adverse impact on wildlife/habitat
- Lack of local amenities e.g. medical services, shops etc.

- Devaluation of property
- Adverse impact on residents
- Loss of agricultural land
- Local schools already at capacity
- Inadequate site access
- Adverse visual impact
- Contrary to current policy
- Numerous underground water courses have already caused subsidence
- Flood risk
- Adverse impact on ancient monuments
- Possible unstable land due to old mine operations
- One of the main gateways to Gower
- Increase in noise, air and light pollution
- Encroachment into open countryside
- Adverse impact on tourism
- Loss of ancient woodland
- Loss of historical heritage
- No defensible boundary to prevent further land release
- Bridleway crosses site
- The area forms a 'green lung'
- Coalescence of settlements
- Loss of educational resource
- National Cycle Route
- Does not meet LDP assessment criteria

1 letter of support was received which is summarised below:

- Objections are typical "not in my back yard" scenario. Sad that locals are opposing such a beneficial development.

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

No comments were received specifically regarding this site.

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

No comments were received specifically regarding this site.

## **Response to Representations**

- Upon commencement of preparation of a new development plan all existing policies and previous decisions (e.g. current UDP designations) are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016
- Highways /access improvements would be a condition of any development being brought forward in accordance with schemes agreed with the Highways Authority
- Woodland areas and key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries. The land is used for grazing and is not part of the accessible natural greenspace/recreation system
- The land is not greenbelt but forms part of the setting of the Country Park and is in use for grazing/keeping horses not for agricultural purposes
- Devaluation of property is not a material planning consideration
- There is a flood risk zone adjacent to the SW corner of the site and is a material consideration but not a prohibitive constraint
- Any development at this location would be conditional upon the preparation and implementation of a management plan for the remainder of the country park which would safeguard it from further development proposals
- Whilst the proposal put forward for residential use , alternative uses are considered as part of the LDP preparation process and a potential use that would be compatible with the use of the park would be as a caravan and camp site at this gateway to Gower which would also have a positive impact on tourism
- There are schools capacity issues which would need to be addressed should any significant residential development be brought forward
- There are no identified deficiencies in local community infrastructure/facilities

- There are no highways objection to the proposal, the site access is satisfactory and the highways authority would support a park and ride facility at this location
- The site is away from historic features but any development proposals would need to safeguard their setting
- The area contains habitats of principal importance for the conservation of biological diversity and more detailed ecological surveys would be required dependent upon nature of scheme brought forward, but does not in principle preclude development within the fields.
- The site adjoins former Clyne Brickworks and a ground conditions survey/appropriate remediation would be required
- The proposal does not impact on the national cycle route or lead to coalescence of settlements. The wider country park would be retained and the Clyne Valley green lung/greenspace corridor/wildlife corridor to the foreshore would be maintained
- The site is visible to immediately adjoining occupiers but there would be limited impact on the visual and residential amenities of the wider area
- Small scale rounding off sites are compatible with the LDP Preferred Strategy and development would not cause any material increase in pollution levels

Above comments and response relate to original submission for larger site (KS001a). Amended proposal for reduced site consulted upon:

### **Special Planning Committee 08/06/15**

#### **Petitioner: Carrie Thomas**

*Here is our petition which summarises the relevant concerns about the new, reduced KS0001 site:*

*This scrubby, tilted, boggy, poor quality grazing land looks as if it has no real worth and should easily be included in the LDP as ideal for residential development.*

*However this green space also has other ways of being described: ancient, unimproved pasture; buffer zone; Country Park; ancient woodland; candidate Site of Importance for Nature Conservation; and Green Wedge; and it is adjacent to and overlooked by part of the Gower Area of Outstanding Natural Beauty.*

### Drawback of terrain

*The plot is tilted from east to west and north to south. Rowan Close has issues due to its lesser slope: some driveways to garages are deemed unusably steep. Slope and solid clay substrate give drainage problems; such boggy areas at the end of Rowan Close meant that garden and lawn became the habitat aridity of shingle. New houses would also have squelchy soils encouraging impermeable surfaces (paths, patios, parking) ...which will increase the problem. A further constructional constraint is raised by Welsh Water, warning: 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.*

### Drawback of access

*How will construction vehicles gain access? To the north, Rowan Close is a narrow, curved road with many street-parked cars. Eastward, access via adjacent fields would destroy three ancient tree-hedgerows and two more pastures: impossible.*

### Ancient woodland

*These woodland-delineated pastures are seen on a map drawn 2 centuries ago. The Woodland Trust explains: habitats with trees over 200 years old are very special - full of wildlife that is found nowhere else and of immense heritage and cultural value. Planning Policy Wales is clear: 'Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development.' Furthermore, Swansea Council has this area in a Woodland Grant Scheme. The agreed management plan includes: safeguarding native fauna and flora and protecting the landscape value and the maintenance of existing [native woodlands], as well as clearly stating that 'All native veterans will be protected and preserved'. Avoiding at least a 50' distance from each veteran tree is necessary in order to avoid damage. That diminishes the development area significantly.*

### Wildlife buffer zone

*A Living Wales says stop focusing on small sites: species protection needs to look at the wider habitat. Clyne Valley is home to breeding populations of many, many protected species, including toads, slowworms, snakes, and lizards as well as butterflies, moths and other invertebrates. There are at least 12 NERC (Natural Environment & Rural Communities Act 2006) Section 42 bird species that use these fields and trees for breeding or food sources and 9 bird species which are in decline. Badgers use the pasture. Besides many internationally protected species of bats, there are also breeding polecats (also NERC Section 42) foraging in this area. It is the duty of the government NOT to interfere with the reproduction of these creatures.*

### Need to protect River Clyne environs

*There are breeding otters in adjacent Clyne River, ranging year-round for foraging. Not only a Welsh NERC Section 42 mammal, the otter has protection through Schedule 5 of the Wildlife & Countryside Act. Otters do not appear to breed CONSISTENTLY*



anywhere else in the Swansea area. The local otter population also use the Valley as a corridor for access, allowing movement towards North Gower. We **MUST NOT** affect their breeding by destroying their foraging areas. Sewage still continues to enter Clyne River. Unpleasant, hazardous and polluting. Further residential development will add to the issue. Natural Resources Wales warns for this site: Advise a Pollution Strategy is required. South west corner of site subject Part Zone C2. Clyne River vulnerable. Consider WFD (Water Framework Directive)

Historic interest.

There is a pillbox within the site. This should be protected as part of our heritage.

Clyne Valley Country Park

This Green Wedge site has no 'defensible boundary' which would act as a physical barrier to prevent further undesirable encroachment. The LDP Issues Paper on Landscape urged: 'Trees, woodlands and hedgerows are important as wildlife habitats .... There needs to be a review of trees to be protected within the County to formally protect those that are vulnerable to development pressure'.

Furthermore, this candidate site was part of Site 144/HC22, which was turned down by Planning in 2005. 'This site forms part of the well-established Clyne Valley Green Wedge, and development would be contrary to the primary aims of the policy, and would create intense pressure for further releases. It contains many mature trees and hedgerows. There are severe limitations also for vehicular access - single access onto Gower Road at junction with visibility problems.'

**Key Stakeholder Consultations**

NB Comments relate to wider submission unless otherwise stated

Internal Stakeholder	Comments
CCS Transportation	<p><u>Means of Access:</u> Access is assumed from Clyne Valley Road, which is of sufficient standard to accommodate the site.</p> <p><u>Local Highway Conditions:</u> Gower Road is a principle road with significant traffic movements. The junction is located on a bend on a steep section of Gower Road and additional turning movements here will need careful consideration.</p> <p><u>Accessibility:</u> There is a 30 min frequency service 100m from the site boundary</p>

	<p><u>Wider Issues / Combined effect:</u> Increased traffic of significant levels cannot be accommodated on Gower Road. All sites will need to contribute to reducing traffic volumes through consideration of a Park and Ride facility or similar. Sketty cross is a designated Air Quality management Zone and this site would add additional traffic flows in that area.</p> <p><u>Restrictions:</u> The local and wider issues identified above may restrict the amount of development that is acceptable on this site.</p> <p><u>Transport Proposals:</u> There is a need to consider traffic volume issues and the possibility of providing a Park and Ride facility in the area.</p> <p><u>Further comments Land off Rowan Close:</u> Development of KS001 on its own is limited by the site area. Rowan Close is of modern standard and suitable in technical terms to serve additional development. Historically there were recommended maximums from a single access point however this is not the case in current standards (Manual for Streets). There is no obvious highway technical reason why this site could not be developed and would just need to be considered on its merits if submitted.</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible.</p> <p>The SHMA identifies that around 1,600 homes are needed within this strategic housing policy zone over the LDP period.</p>
CCS Biodiversity	<p>This site contains; Purple Moor-grass and Rush pasture, Lowland Mixed Deciduous Woodland and Diverse scrub. Purple Moor-grass and Rush pasture and Lowland Mixed Deciduous Woodland are habitats of principal importance for the conservation of biological diversity in Wales under the natural environment and rural communities act (2006).</p>
CCS Environmental Health	<p>Directly adjoins Clyne Brickworks. Site investigation condition</p>
CCS Education	<p><u>Cila Primary:</u> There is no capacity at Cila Primary. 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.</p> <p><u>Olchfa Comprehensive:</u> Has very little surplus capacity - Developments in the catchment area would require significant investment to the school to enable any increase in pupil numbers</p>

External Stakeholder	Comments
Natural Resources Wales	<p>Comments on Draft Proposals Map site boundary:</p> <p>Consider MOU. Gowerton STW</p> <p>Probable BAP Habitat composed of grassland, woodland and scrub. Phase 1 maps identify the site as semi-improved grassland.</p> <p>Advise a Pollution Strategy is required.</p> <p>South west corner of site subject Part Zone C2. Clyne River vulnerable. Consider WFD.</p>
Dwr Cymru	<p><u>Water Supply:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> The local water supply network for this ward is suffice to meet the projected growth promoted. However, for the large sites in particular, some modest off-site mains will be required to service the sites.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Proposed developments in this ward ultimately drain to our Gowerton Waste Water Treatment Works. Based on the cumulative growth information provided for the residential, employment and the residential element of mixed sites, our assessment equates to a population in excess of circa 35,000 people. If all this growth is to be promoted in its entirety, then we will need to plan for future investment plans at the appropriate time. <u>Site Specific Comments on the Draft Proposals Map:</u> 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>Swansea Bay Waste Water Treatment Works capacity – ok.</p>

Western Power	Western Power Distribution (WPD South Wales) presently have fifteen 33/11kV substations and two 132/11 kV substation providing electricity supplies in the Swansea area. There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	Mining legacy - Mine entry at south
Killay South Community Council	<u>In relation to original submission</u> 1. The land is currently protected as part of the Clyne Valley Park. 2. To build on this land would destroy the natural habitat and many species of wildlife. 3. Concern raised with the access to the site at a point presumably on a very dangerous steep hill and the impact extra traffic would create on an already heavily congested Gower Road. 4. Other issues arose were in relation to the impact on local schools, doctors and dentists surgeries

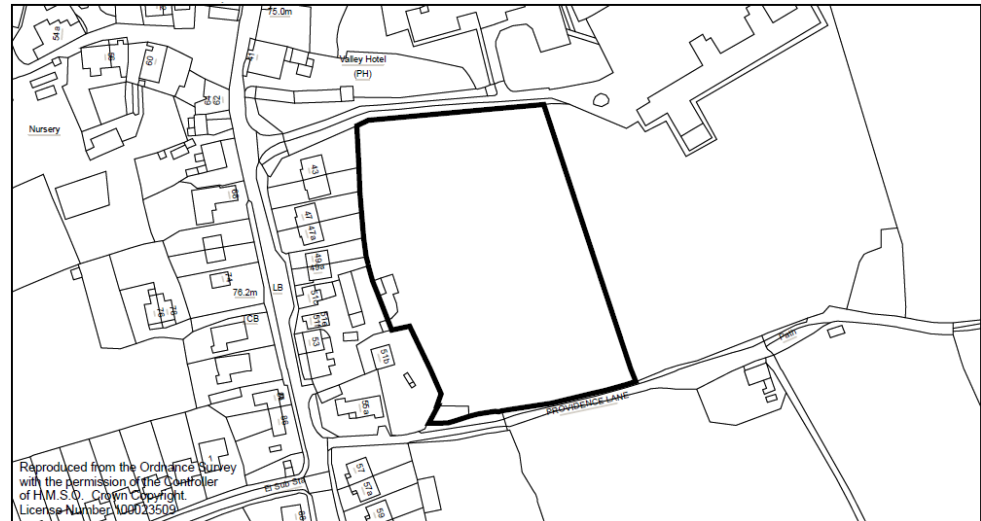
### Stage 3A: Assessment Against LDP Objectives

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

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

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

<b>Reference</b>	<b>BI002</b>
<b>Name</b>	<b>Land to the Rear of 51B Bishopston Road, Bishopston</b>
<b>Description</b>	This backland site is situated towards the central part of the settlement of Bishopston. Bishopston Comprehensive and Primary Schools are situated to the immediate north and east of the site, there is residential and commercial frontage development to Bishopston Road to the west and agricultural land to the south. The roughly rectangular site is flat and featureless apart from the boundary hedgerows. Access to the primary school runs along the northern boundary and there is a lane /PROW to the south. A previous application for residential development on this site has been refused and an appeal dismissed. The current proposal is for 100% affordable housing and the site is being considered for release as an exception on this basis only.
<b>Size</b>	0.98 Ha
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



## Candidate Site Public Consultation: Summary of Representations

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

25 letters of objection were received which are summarised below:

- Against PPW/Contrary to current Policy, Land is Green Wedge, Development in the Countryside
- Erosion of open space
- Providence Lane would not achieve access which would meet highways requirements
- Inadequate bus services and limited local amenities
- No proven need for additional housing
- Increased pressure on infrastructure and services/Overloaded water and sewerage system/Inadequate gas and electricity supplies/Schools are already oversubscribed
- Inadequate drainage, current flooding issues
- Unacceptable affect on wildlife.
- Agricultural land should be protected
- Potentially unstable geology
- Loss of wildlife habitat.
- Would cross registered footpath.
- Adverse impact on AONB
- Adverse impact on tourism and local business
- Adverse impact on health and well being
- Visually intrusive
- Unacceptable impact on character and amenity of village
- Site lies within Bishopston Conservation Area
- Encroachment on other residences/Blurring of village boundaries, coalescence with Murton.

1 letter of support was received which is summarised below:

- Should be used for a leasehold scheme for the elderly
- Primary school requires more pupils

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

Representation from Landowner's agent promoting the site for the following reasons:

- abuts settlement boundary and well located for local facilities/bus services
- Result in access improvements – alleviate congestion
- Defensible boundary of adjoining school and residential development
- Lies outside AONB. Minimal impact on green wedge.
- Currently used for grazing, no significant ecological value, hedgerows can be retained & reinforced
- Propose to deliver affordable housing working with Coastal Housing.
- Site is available within plan period.

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

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

- Increase existing traffic/pedestrian safety issues arising from congestion caused by school traffic and newly opened Co-op.
- Permission previously refused at appeal on the grounds of inadequate access and impact on residential amenity.
- Historical Issues of legal ownership of Providence lane.

## **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. This will apply to UDP green wedge designations. 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. Consultation on an initial review of green wedge, open countryside and settlement boundaries has recently been undertaken and will inform the LDP Deposit Plan

- Any loss of recreational/open space will need to be addressed through compensatory provision within the proposed development or nearby. Any existing deficiency of 'Fields in Trust' (FiT) or accessible natural greenspace (ANGS) provision will also need to be addressed through new development.
- 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 landowner has submitted proposals to widen Providence Lane to enable the required highways improvements to be achieved. Where ownership of the access route is disputed, the Council require ownership evidence to be submitted in order demonstrate that suitable access can be achieved and that the allocation is capable of delivery within the plan period.
- The population of Swansea is growing year on year; there is a shortage of housing land, and lack of affordable housing in all areas. The Council is statutorily required to meet housing needs over the plan period and the evidence base, including the strategic housing market assessment, population projections, etc identify that provision should be made for 17,000 additional homes.
- The Strategic Housing Market Assessment has identified the 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
- DCWW have responded as part of the recent consultation and have highlighted that further development would exacerbate existing mains water pressure issues, accordingly a hydraulic modelling assessment is required to establish the potential impact of development on the network, for which improvements would be required to be incorporated into the development. Recent comments highlight no problems with the public sewerage system for the site or with the capacity of the WWTW. Where improvements are identified, DCWW are statutorily required to include all necessary improvements to support new development in their statutory improvement plan. 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.
- All relevant utility providers have been consulted and no significant utility constraints have been identified



- The local health authority has not identified any capacity issues at local medical practices. If new facilities are required they could be delivered in conjunction with development being brought forward. New development also has a positive impact by increasing local populations, adding to the vitality/viability of settlements and helping to sustain and improve local services, facilities and businesses. Services at capacity will expand to meet demand. If improvement of facilities is required contributions can be sought from site developers
- The LDP is being prepared in close liaison with the Local Education Authority (LEA) who are fully aware of the potential additional pupil numbers likely to be generated and have made provision accordingly within the 21<sup>st</sup> century schools programme. Existing schools will be expanded where possible and new schools built as appropriate to accommodate the projected increase in pupil numbers. In West Swansea an ageing population profile and limited opportunities for new build housing/ under occupation of housing by increasingly elderly population will likely see a reduction in demand for school places from within existing catchments
- 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). The County Ecologist has advised that a hedgerow assessment would need to be undertaken to determine the hedgerow quality and the findings of this would be taken into account when considering a site's development capacity. Key features, hedgerows, bridleways, etc should be retained as part of any development proposal and form natural defensible boundaries
- The site is Grade 1 Agricultural Land. The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Through the Spatial Options Appraisal and site deliverability assessment, the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there has been an overriding need for development to fulfil the LDP Strategy, as there is no other suitable location in which housing /employment allocations can be situated, this has resulted in some allocations, or parts thereof being situated on BMV land.
- The Council's Environmental Health Section provides information on guidance on historic site activities, including the location of landfill sites and appropriate buffer zones. The Coal Authority provides advice on past mining operations. Existence of such features on or near to a site does not preclude development and a detailed ground conditions survey would need to be undertaken at planning application stage to identify and address all such issues.
- The LDP seeks to safeguard against coalescence and development must respond to the character of existing settlements. Considerable areas of accessible open space are proposed as part of new development and green barriers are to be incorporated into scheme layouts to mark and ensure separation between existing and planned expanded communities.

- Creating new places which foster the health and wellbeing of both existing and future residents is a key objective for the LDP. In the case of strategic sites (which constitute around 60% of new allocations), this is achieved through a process of detailed masterplanning which seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/ contaminated land and surface water flooding.
- The 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
- 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
- A PROW does not preclude development - it may be diverted and an appropriate alternative route incorporated through the development site
- 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. Where incidents of localised surface water flooding have 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. This site is not within a flood risk zone and there are no incidents of flooding recorded against this site.
- Residential 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 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.

- While the character or appearance of conservation areas must be a major consideration, it cannot prevent all new development. The impact of development on a conservation area would be a matter to be addressed through a detailed site layout at the application stage. The proposals would be judged for their effect on the character and appearance of conservation areas, as identified in the assessment and proposal document, to ensure that any new development is in accord with the area's special architectural and historic interest.

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

### **Cllr Keith Marsh**

*A summary of objections raised by residents, Bishopston Primary School governors and Bishopston Community Council*

*Refer to the letters used to denote the various sections of my written submission.*

- A. Objection – because of the previous REFUSAL by Swansea Local Planning Authority (LPA) and the Appeal Inspector in 2003 against the original application for 5 DWELLINGS. There has been no material change in the situation at this site – and now development for 35 DWELLINGS is to be considered.*
- B. Objection – to development due to increased activity in that section of Bishopston Road between primary school driveway and Providence Lane. This has resulted from an upgrade of a previously run-down SPAR to a smart Co-op minimarket. It is considered that introducing an additional 35 dwellings in the vicinity will exacerbate problems currently being experienced.*
- C. Objection – there will be no positive access improvement, especially at the school entrance where difficulties of egress on to Bishopston Road are experienced on a daily basis. Should development be permitted, with TWO access/egress points, there is a possibility that some drivers may use it as a means to bypass that section of Bishopston Road between those points. (Drivers currently ignore signs, TROs and double-yellow lines!).*
- D. Objection – as stated in (c) there exists a problem egressing from the school driveway due to the position of the Valley Hotel. There is impaired visibility due to the building which is made worse should service bus No. 14 be waiting at the stop outside. Vehicles proceeding south, i.e. towards the narrow section of Bishopston Road, have to pull out to overtake which has*

*resulted in “near misses” occasionally as these vehicles are out of sight to drivers egressing from the school and others travelling north towards the junction with Northway and Pennard Road, i.e., the Malthouse.*

- E. Objection – to use of Providence Lane as it is considered there will not be sufficient width enabling two vehicles to pass safely. (In the event of planning permission being granted for any development at this site, etc., there will be a need to safeguard the walls of No. 57, Bishopston Road which include some of dry-stone construction, thus reducing further the working width available).*

*This lane is the primary walking route between Bishopston Road and Murton and how ROW No. BI50 and No. BI8 forming the most direct and continuous route between the villages. Together with ROW No. BI7 and ROW No. BI9, these ROWs are used by pupils of both the primary and secondary schools in the area as they are considered a safe means to those establishments. Pupils needing to access the Co-op store could risk coming into conflict with vehicles entering or leaving a development on this land.*

*The same would apply at the primary school entrance where pupils could be in conflict with vehicles entering or leaving the site, especially during the period of construction.*

*Pupils using ROW No. BI9, would of necessity have to cross the access leading into the site. The footpath, on its eastern and northern sides, borders the Candidate Site. ROW No. BI9 lies entirely within the curtilage of the primary school.*

*Remember! Safety of pupils is paramount!*

- F. Objection – the land is classified as “Grade A1/A2 agricultural” and as such should have protection under current and future planning policies.*
- J. Objection – reiterate (F) land could be used for allotments, grazing (a previous use), market gardens or to grow cash crops, e.g. Christmas trees, etc.*
- K. Objection – this suggestion is totally unacceptable, given the problems already existing – the school driveway for most of its length is a single carriageway. As previously stated the problems perceived could occur at both access/egress points.*

L. *Objection – following presentation to primary school Governors by the agent acting on behalf of the landowner there was a discussion. The governors endorsed objection to the suggestion that the school entrance should be considered as a means of access to the site, irrespective whether, or not, any alterations were made to the access.*

*Safety of pupils was considered paramount.*

N. *Objection – analysis of the earlier REFUSAL notices seem to enforce the need to maintain the area of “green wedge” between Bishopston and Murton of which this site forms part.*

*COMMENT: In the section of Bishopston Road between Providence Lane and school entrance, the widths of the footways are substandard. Mothers with “buggies” are often forced to use the carriageway to enable the school entrance to be accessed.*

*I request the committee agree to a site visit, please. The aerial photographs do not give a good presentation of the situation on the ground.*

*Residents have suggested 14.30 when parents can be observed parking to meet their children at the end of the school day.*

*Additional objections*

*Based on information not available at the meeting.*

*PROVIDENCE LANE*

1) *Objection – based on an e-mail sent on 9<sup>th</sup> OCTOBER 2009 to the resident of No.2, Providence Lane from the Highway Officer following a pre-application discussion for a single dwelling within her curtilage in which he stated:*

*“Access would need to be 5.5m wide for the first 12m of its length, and at least 4.5m thereafter. This is the standard required for 5 dwellings using shared access. Next standard down considered would be 4.5m wide, but it is noted the land measures 4m at best and less than 4m at the junction. Visibility splays are also substandard and do not comply with the necessary criteria.”*

*(This e-mail makes no mention of the need for a surfaced footway to accommodate ROW No B150 from the site access to its junction with Bishopston Road. (This resulted from a discussion with a member of the Rights of Way team))*

*The resident had informed the officer that there had been increased use of the land at this time. His response indicated in that case the widths to which he referred may need to increase – which would be less achievable. The resident did not proceed with her application based on the information received.*

*I, as ward member, must conclude that, without significant improvement in the width of the lane between Bishopston Road and any new dwellings, any proposed development is unlikely to be supported.*

*We now have a situation where:*

- i) An application for a SINGLE dwelling has not proceeded as a result of advice received.*
- ii) An application for 5 dwellings has been refused and turned down on appeal.*
- iii) A consideration for this Candidate Site to be made available for the construction of 35 dwellings, albeit for low-cost housing.*

*2) Objection – based on the outcome of an alleged dispute relating to the exact position of a “ransom strip” which has been registered by the owner of the Candidates Site. It would seem that this strip forms an important part of the attempt to have the Candidate Site included in the forthcoming Local Development Plan (LDP)*

*3) Objection – The lane is in private ownership, presently unknown. I have spent considerable time researching this up the present – unfortunately to no avail!*

*The landowner has only made an access off Providence Lane during the past 10-15 years. Prior to this access was historically achieved through a gate in the yard to the rear of the store, i.e. now the Co-op.*

*It is alleged (not my words) that the owner of the Candidate Site has no established right to use the land for agricultural access.*

*Construction traffic, no doubt, would present its own problems. Access, times, etc*

## Key Stakeholder Consultations

Internal Stakeholder	Comments
CCS Transportation	<p><u>Highways comments on original candidate site submission 2011</u></p> <p>Access from the north will require use of the access road to the school and there is substandard visibility at the junction with Bishopston Road.</p> <p>Access from the south would require use of Providence Lane which is below acceptable</p>

	<p>standards for serving further development of this nature.</p> <p>There is congestion at the junction of the access road leading to the site which occurs at the start and end of the school day. Further traffic generation at this location is not acceptable.</p> <p>There is an hourly service past the site which is considered limited. Any significant traffic generation cannot be accommodated on the roads leading to the site. There are three routes into the area, Oldway, Bishopston Road and Caswell Bay Road. All three routes have limitations due to the substandard nature of the roads with regard to alignment, width and lack of pedestrian facilities.</p> <p><u>2014 - Draft Site layout submitted</u> which included proposal for access to be achieved from Providence Lane. CCoS Transportation consulted and approval given in outline, subject to further scheme details</p>
CCS Housing	<p>There is a requirement for affordable housing across all areas of Swansea and it will be important to maximise affordable housing delivery wherever possible. The SHMA identifies 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	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 issues
CCS Education	<p><u>Bishopston Primary</u>: The current primary provision could sustain some increase in pupil numbers; however there is concern over suitability of the current provision. Access to the primary school site is restricted but could be improved if linked to the adjacent site proposal BI002.</p> <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>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>Bishopston STW - No issues we are currently aware of, but capacity should be checked with DCWW.</p> <p>The site is located outside, but close to the boundary of the AONB. From the aerial photographs the grassland appears to be of limited habitat value. However, mature hedgerows &amp; trees run along the eastern &amp; southern boundary. Several PROW's run along the boundary of the site (possibly within the site). Hedgerows are likely to be utilised by numerous species and provide connectivity.</p> <p>WFD Good.</p>
Dwr Cymru	<p><u>Water Supply</u>:</p> <p><u>Initial Comments for Candidate Sites in the Ward</u>: This area suffers from mains water pressure and any further development will exacerbate this situation. Accordingly a hydraulic modelling assessment is required to establish the potential impact of the demands on our network for which network improvements, off-site provision of mains and potentially a new service reservoir would be required.</p>



	<p><u>Site Specific Comments on the Draft Proposals Map:</u> A water supply can be made available to service the proposed development site.</p> <p><u>Waste:</u>  <u>Initial Comments for Candidate Sites in the Ward:</u> Bishopston has its own waste water treatment works and based on a projected growth of circa 450 homes will be unable to accommodate all of this growth without future investment.</p> <p><u>Site Specific Comments on the Draft Proposals Map:</u> No problems envisaged with the public sewerage system for domestic foul discharge from this proposed development site.</p> <p>Bishopston Waste Water Treatment Works capacity – ok.</p>
Western Power	There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth.
Coal Authority	No coal mining legacy features identified by the Coal Authority.
Bishopston Community Council	<ol style="list-style-type: none"> <li>1. Additional loading of services:- <ol style="list-style-type: none"> <li>a. sewage - sludge currently tankered ex Brandy Cove Plant to Gowerton for treatment - daily</li> <li>b. electricity</li> <li>c. water - pressure at times affected</li> <li>d. gas</li> </ol> </li> <li>2. Difficult access.</li> <li>3. More traffic generated around primary school.</li> <li>4. Planning applications refused in previous years.</li> <li>5. Loss of part of green wedge between Bishopston and Murton.</li> <li>6. Adjacent to Bishopston Conservation Area.</li> <li>7. Additional pressure on oversubscribed schools.</li> <li>8. Site entirely surrounded by registered footpaths (BI No. 9 and 50) also providence is private unadopted lane.</li> </ol>

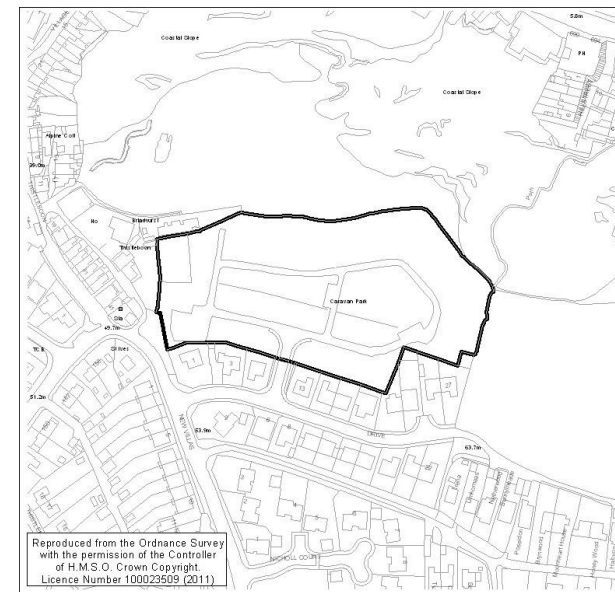
### Stage 3A: Assessment Against LDP Objectives

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

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

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

<b>Reference</b>	<b>OY003</b>
<b>Name</b>	<b>Thistleboon Caravan Park</b>
<b>Description</b>	Static Caravan Park adjoining Mumbles Hill Local Nature Reserve. Located to the north of and served from Thistleboon Drive. Bounded by Thistleboon Rd to the west and the Nature Reserve to the north and east. The land to the north is also common land and forms part of Mumbles Conservation Area. The site lies outside the current UDP settlement boundary and is dissected NW to SE by the AONB boundary (which follows no discernible boundary on the ground). There are around 63 caravans on site plus two car parking areas and an amenity area. The caravans are 10 month occupancy restricted (no occupancy during January and February). The proposal to be considered is the incorporation of the site within the settlement boundary.
<b>Size</b>	1.424 Ha
<b>Existing Land use</b>	Leisure – Static Caravan Park
<b>Proposed Land Use</b>	No alternative land use proposed – proposed amendment to incorporate site within settlement boundary
<b>Location Plans</b>	OS Plan and Aerial (not to scale)



## Candidate Site Public Consultation: Summary of Representations

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

269 letters of objection were received which are summarised below:

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

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

No further representations received

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

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

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

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

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

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

## **Response to Representations**

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

- The caravans have 10 months permitted occupancy, not 12 months and therefore do not provide affordable housing. They are not to be used as primary residences.
- Acknowledge that the site provides income for the Council. No evidence available to indicate contribution to local economy of privately owned static holiday homes.
- Site lies partly within Gower AONB
- Site lies outside Nature Reserve
- Only site of this nature in the locality. If proposal were to proceed it could not set a precedent
- Upon commencement of preparation of a new development plan (LDP process currently underway) all existing policies and previous decisions, e.g. current UDP Inspector's findings, are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016
- No indication of significant pollution issues at the site
- Sufficient sewerage capacity – possible water supply improvements required, however services already exist on site.
- Not a flood risk area. All new development needs to demonstrate greenfield run –off. No increase in surface water run-off would be permitted
- Not recreational space – only public access is along the rights of way (PROW) which would need to be incorporated within any development proposal
- Only issue to consider is whether this site which is urban in character and could not be described as open countryside should be shown on the Proposals Map as within or outside the settlement boundary. The settlement boundary is intended to distinguish between the urban and rural form.

### **Special Planning Committee 11/06/15**

Petitioner: Paul Treweeks

*Our position is that we, object to proposals in the LDP that greatly reduce the likelihood of the site continuing to be used as a caravan park in the future.*

*As our formal objection stated, the LDP proposal could have ensured that the current leisure / tourism use would be protected but the proposal initially to consider the site as a Candidate site for Housing and subsequently to include the site wholly within the settlement boundary suggests that the council is sending a message that the major obstacles to future residential development are removed to secure the potential for sale to the highest bidder.*

*We recognise that the planning officer's report says that there is a "need to provide greater clarity of the status of the land" but the recommendation that the site is brought into the settlement as "white land" without any designation ignores the current use of site. It is neither a green field nor a brown field site, it is a successful & sustainable development which makes a positive contribution to the local community is reaping the rewards financially for the investment made by the Council.*

*The site has been used as a caravan park for over 50 years and a strong community of caravaners has developed which since the redevelopment of the site in 2003 has generated income of rent alone of £1.5m which is an increase of 3 times the combined income of the Plunch Lane and the current site then known as Thistleboon.*

*Economic viability is a significant criteria in the LDP and the income from the caravan park is guaranteed year on year come rain or shine with a significant waiting list for plots on the site which has been completely filled since the redevelopment 13 years ago. The current change to undesignated "white land" could jeopardise this income by introducing doubt about the security of the tenancy of the caravan users.*

*Local businesses have directly benefited as the tenants have between them made an ongoing investment of well in excess of £1m to date for caravans purchased from local suppliers.*

*In answer to a question from Councillor Colburn in a minuted Council meeting in December 2014, the Cabinet Member for Enterprise, Development & Regeneration stated that "whilst the (site) OY003 is not specifically allocated, it could nevertheless become a windfall site in future should the Council wish to dispose of the land".*

*It seems clear that rather than straightening out an anomaly in planning law to protect the current use, the opportunity has been taken to leave the door wide open for offers from residential property developers whose aim will be to maximise profit and not the protection of existing character of the site. We are not sure that the local residents are fully aware of this.*

*The LDP Stage 2 Planning Assessment in many instances reports the benefits of the proposed change to the settlement boundary on the basis of change to residential use – it even cites the benefit of 100% affordable housing because part of the site it is in an Area of Outstanding Natural Beauty.*

*No detriment to the environment is identified in the LDP Stage 2 Planning Assessment but any residential development would see a large amount of the open grass area and hedgerows replaced by housing which would aim to cram as many houses as possible onto the site imposing itself onto the Conservation Area & Nature reserve in a way the current site simply doesn't.*

*In summary we ask that in order to maintain the benefits of the ongoing site as a Caravan Park bringing revenue into the Council and affording a buffer between the urban development and the adjacent conservation areas, that the Council directs their officers to prepare proposals to amend the LDP to designate site OY003 as to be for the purpose of a static caravan site to properly protect the benefits to all of the current use.*

## Key Stakeholder Consultations

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



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

Mumbles Community Council

Preferred Strategy

Object to the identification of 'limited rural/urban fringe extensions' on land in the general area of Thistleboon, near Mumbles.

Obviously at this stage in the LDP process the precise proposed allocations and designations have not yet been drafted. However, the Local Authority will already be aware of the considerable number of negative comments on these sites that have been made during the ongoing consultation on the Candidate Site Register. The Community Council, for the avoidance of doubt, advise that the site has more than 2,200 comments against development and none in support.

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

	<p>It is noted that the Transport and Access Topic Paper within the evidence base highlights that there are significant infrastructure problems associated with sites in the area, in particular that Higher Lane is substandard. Even if highway improvements can be secured as part of this area's development, there would still be substantial effects on the wider road network which is already at capacity). Moreover, there are pollution problems in parts of Mumbles that as a consequence of the volume of traffic would be further exacerbated by the quantum of development that the Preferred Strategy suggests in possible at Thistleboon. .</p> <p>Mumbles Community Council are also concerned that development of the kind being suggested would place strains on the sewage system and potentially increase the risk and likelihood of surface water flooding, which is already a local problem. It is considered that the evidence base this far does not recognise existing problems and there is therefore concern that those problems would firstly not be solved via the LDP and secondly would be accentuated if the adopted LDP followed the Preferred Strategy.</p> <p>Furthermore, there does not appear to be any consideration of the effects upon other local services and facilities. Development of these sites would need to make substantial and early contributions to upgrade sewers and schools.</p> <p><u>OY003</u> Loss of tourism facility. Residential development on this site would be visible from most directions and would intrude into the treescape skyline of Mumbles. Area of green space protection EV24 Development would be inside the boundary of the Gower AONB.</p>
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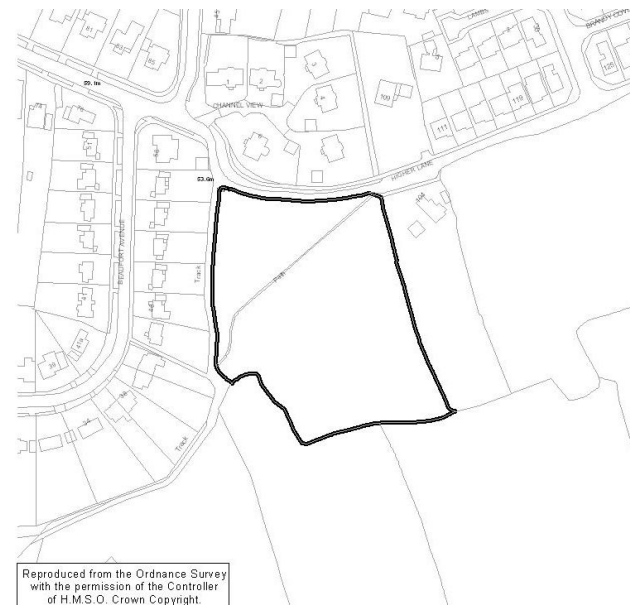
### Stage 3A: Assessment Against LDP Objectives

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

### 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	+/-	?	?	++	?	?

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



## Candidate Site Public Consultation: Summary of Representations

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

2351 letters of objection were received which are summarised below:

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

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

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

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

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

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

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

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

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

## **Response to Representations**

- The site is located within the AONB where current national and local planning policy (UDP Policy EV18) already permits the release of land adjoining settlements as exception sites for the specific purposes of providing local needs affordable housing for those who cannot be reasonably be accommodated through the area's general housing market. National policy is not changing therefore local policy will remain unchanged through the adoption of the LDP regardless of whether or not the site is allocated for development.
- The Strategic Housing Market Assessment has identified the Gower AONB and fringe as an area where there is a need for up to 500 affordable houses, but no need for further market housing. Particular issues in this area are lack of affordable housing for first time buyers and lack of older persons accommodation (e.g. Newton Court or McCarthy and Stone type accommodation) providing local alternatives to current high proportion of under – occupied family housing
- The release of land at this location would be as an exception and not set a precedent
- Upon commencement of preparation of a new development plan ( LDP process currently underway) all existing policies and previous decisions, e.g. current UDP Inspector's findings, are subject of review and moreover the UDP policies will have no status upon expiry of that plan from Nov 2016



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

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

### Special Planning Committee 11/06/15

#### Petitioner: J. Burgess

*I reside in Langland and I am here today in the capacity of Lead Petitioner, representing 4 thousand + petitioners who are against the proposed development of Candidate Site referenced OY016, Land at Higher Lane Langland for the proposed provision of 30 units for affordable/older persons housing. The land being in the ownership of the Somerset Trust, and is wholly within the Gower AONB.*

*As time today is limited, I would wish to proceed not by reciting our specific objections submitted on our 4,042 Candidate Site Comment Forms, but to comment upon a few of the City and County of Swansea's written Responses to Representations (objections) Against Development, contained within the Council's Site Assessment Reports.*

*I will proceed firstly with the CCS comment in response to our objection on developing this area of the AONB, they state **"There has been degradation of this part of the AONB due to close proximity of the urban form through prominence of domestic paraphernalia/outbuildings within existing adjoining rear curtilages such as Beaufort Avenue which has a far greater visual impact on the AONB and coastline than this site."***

*Dear Chairman, this built environment, let us not forget, was created by the same landowner working within a planning and design framework who then sought to obtain planning approval for residential development, on the land that we are now objecting to, resulting in an appeal being held in 2007.*

*The Planning Inspector concluded that **"To include these (candidate )sites within the Gower and Gower fringe housing policy zones which are particularly sensitive to development pressure, would be contrary to the Plans approach of not relying on***

**sites within these areas to help meet the general estimated new housing requirement of the Plan area as a whole.**"The Planning Inspector therefore concluded that these sites are not suitable for development.

So, a fair and reasonable question still remains to be asked as to why the CCS continues in its endeavours to pursue the planned erosion and in their words, degradation of this vital green buffer zone lying within the Gower Area of Outstanding Natural Beauty, the first designated and nationally protected AONB within the British Isles which was formed in 1956 by a group of local passionate people who fought against, as we are here today, the degradation and erosion of cliff land green open space.

It is also relevant here in quoting recently what Carl Sargeant, Welsh Minister for Natural Resources had to say in response to the possibility of AONB's status being re designated in an effort to afford more rigid protection, he states **"These areas are highly valued. They are integral to Wales national identity and are recognised Internationally as part of a global family of protected areas. I am proud that a quarter of Wales is recognised in this way. They are assets that we should celebrate and protect."**

And in respect of our concern that a precedent would be established should approval be forthcoming for this site, the CCS states, **"The release of land at this location would be as an exception and not set precedent"**, and I would combine this with another stating **"The landowners are aware that only exception housing will be permitted. The site remains outside the settlement boundary to ensure this is the case and be able to resist future pressure for revised schemes for high end market housing following grant of any planning permission for affordable/older persons housing."**

(2)

Firstly it is a fact that there is land within the immediate area which at the start of the LDP process was outside the settlement boundary. This land is now in the process of being brought within boundary lines and thus will be designated as residential development land. Therefore it gives no comfort whatsoever in Council statements suggesting that they are able to control land by settlement boundary definitions, when clearly this is not the case.

Secondly, considering the site is in the ownership of the Somerset Trust who, adopting a commercial view, and not adopting philanthropic ideals, would only in our view, pursue a non-profitable planning permission, if it formed part of a much larger comprehensive development, or viewed it as a leverage for further development opportunity, begs the question as to why the CCS when it has other immediate comparable options within its ownership, capable of accommodating the Plans Strategic Housing Policy needs, wishes to place a real and unnecessary risk on compromising the continued existence, of this unique and extremely important cliff land area.

*I would like to complete this particular issue by stating that in some parts of the country where LDP processes have been completed, Developers have, through legal loopholes borne out of an amended National Planning Policy where the presumption is in favour of development, have to-date obtained residential planning approval for a current total of 25 thousand dwellings within the green belt, and outside of the Plans designated housing zones.*

*Again this affords little comfort in relying upon policy which has been proven, can be challenged, so please CCS, do not provide a foothold for unintended but very serious consequences that will bring about ongoing risk to our AONB.*

*We are not alone in our efforts objecting against this proposal, not, I must emphasise, against the housing market need, but for the provision to be met on such an important site.*

*I would like to quote from Mumbles Community Council comprehensive commissioned report on the proposal, undertaken by Carlisle, Davies and North Planning Consultants which incorporates a number of our concerns, and states, **“From the above appraisal of the site, it is evident that there are significant flaws in the proposed allocation of this site. Most obviously, it will result in around 30 dwellings being built on land within the defined AONB. Even if the site was outside of the AONB, it clearly is part of a significant landscape area that serves an important purpose in dividing the urban edge of Swansea from the sensitive coastal area between Limeslade Bay and Langland Bay.***

***This encroachment of urban form towards the coastline across valued open land would also likely have an effect upon users enjoyment of the open access land and of the rights of way that are within and near to the candidate site. There will be associated visual effects upon local residents as well as members of the public rights of way.***

***Parts of the site also appear to be at risk of flood from surface water run-off, a fact that would be amplified by the introduction of built development to a currently greenfield site; the increased risk of pollution along the run off to the sea is also a noteworthy issue. Moreover, there are potentially ground conditions that could have a considerable effect on any development of this site, and indeed in turn could be accentuated by development taking place.***

***They further state that “We understand that the entire undeveloped area of Thistleboon is subject to subsidence. There are Roman mines in the area that lead underground from cliffs into the land beneath the site. There are also sink holes and collapsed caves including surface water flood risk. Indeed we are advised that much of the local area is characterised by fissures, active sinks and collapsed cave chambers.***

**Another significant issue affecting this site they state, is the access problem and related transport and highway issues. Development of around 30 units would continue to add to traffic problems within Mumbles, particularly because there is no route to the site that avoids complex junctions,**

**pinch points, steep hills or Mumbles Road. Although an hourly bus service does pass the site it is inevitable that there will be an increase in the use of private car as a consequence of development, especially due to the relative inaccessibility of community facilities and shops from the site by foot or by bicycle.**

**The highway network in the immediate vicinity of the site is also extremely substandard. Substantial works would be required to improve this, which even if they could be achieved, would likely be at the expense of residential amenity and ecological/landscape features.**

**Their final and concluding narrative states, “It is concluded that on the basis of the current available evidence this allocation would render the LDP unsound and as such we object to the proposed allocation.**

*On that note Chairman we submit our oral presentation which we respectfully request you will take into consideration for review.*

**Site promoter: Geraint John**

*As Members will be aware, the Council seeks to allocate land at Higher Lane as a ‘Gower Fringe (Affordable/Older Persons) Housing Site’. It is evidenced within the Council’s Strategic Housing Market Assessment, which supports and underpins the emerging LDP, that there is a pressing need for such accommodation.*

*The LDP Preferred Strategy identifies that the only opportunities for housing in this part of the City are through small scale rounding off ‘Rural/Urban Fringe Extension’ sites (such as this).*

*Importantly the allocation of this site would ‘free up’ under-occupied homes in the settlement, and provide much needed ‘churn’ to the housing market in this part of the City.*

*The proposed allocation, which has of course been rigorously assessed by Council Officers through the Candidate Site process, is located immediately adjacent to the settlement, with a number of key local facilities and services being accessible by walking, cycling and public transport.*

*In terms of site designations, the site is not designated as a SSSI, or part of a green belt, and furthermore, as outlined within the Council's assessment of the site, occupies a low lying position which is not visible from the coastal path or sea.*

*The site is bound by residential development to the northern, eastern and western boundaries, and therefore occupies a suitable and acceptable 'pocket' of land within an existing development pattern, which is well screened by existing vegetation. This has been confirmed by the Officer Candidate Site Assessment. The assessment records that the prominence of existing residential development, has "a far greater visual impact on the AONB and coastline than this site".*

*Furthermore, landscape and visual assessment undertaken by appropriately qualified professionals, concludes that the site has "a limited visual envelope...wider views are limited, and the site is viewed within an existing baseline of residential development".*

*In terms of highways and access, the existing highway alignment would be retained with minor improvements (to continue to act as a traffic calming measure), and that adequate capacity exists in the surrounding network to cater for the development.*

*An Extended Phase 1 Habitat Survey has been undertaken by appropriately qualified professionals, which has concluded that the land is of low intrinsic ecological value, and consequently represents a suitable area to accommodate development.*

*It is noted that a public right of way crosses the site – leading south down to the cliff tops and connecting with the Wales Coastal Path. A slightly amended route will be provided within any proposed layout to ensure that this public right of way is not discontinued, and continues to integrate with the existing network.*

*There are no constraints in regards to other infrastructure, services and utilities, meaning there are no limitations to the deliverability of the site. The site is outside of any flood zone, and, appropriate drainage measures can and will be incorporated within any development of the site.*

*It is noted within the commentary associated with the Candidate Site Assessment process that Officers do not consider the "loss of agricultural land would impact on viability of a wider agricultural holding." Indeed, Officers consider that the "New development would add to vitality/viability of the existing settlement, particularly if it enabled families to move into currently under occupied homes vacated by older persons".*

*In light of the above, the proposed allocation of the site presents a suitable, viable and deliverable development opportunity that can provide for, and is wholly in line with, the policy provisions and aspirations of the Plan. Accordingly, the site will make a*

significant contribution to achieving the housing aspirations for much needed affordable and older persons housing in the Gower fringe area, and it is respectfully requested that the site's continued allocation in the Plan is endorsed as such.

## Key Stakeholder Consultations

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

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



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

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

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

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

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

#### OY016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

	<p>concerns about the impacts that would arise from the allocation and development of the site for housing, especially considering its location within the AONB and on a constrained highway and its context and relationship with the urban form of Mumbles and the coastal area to the south. Without prejudicing any representations required at the deposit stage, we consider that the allocation of this site would fail the following tests of soundness:-</p> <ul style="list-style-type: none"> <li>• C1 - the land use plan does not have sufficient regard to the Gower Landscape Character Assessment</li> <li>• C2 - the plan does not have necessary regard to national policy insofar as a greenfield site which is in the AONB and which has significant landscape value is proposed to be allocated</li> <li>• CE1 - no logical strategy would allow for an area of AONB to be allocated for housing</li> <li>• CE2 - no robust or credible evidence base would allow for an area of AONB land to be allocated for housing</li> </ul> <p>It is concluded that on the basis of the currently available evidence this allocation would render the LDP unsound and as such we object to the proposed allocation.</p>
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### Stage 3A: Assessment Against LDP Objectives

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

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

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

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



## Candidate Site Public Consultation: Summary of Representations

### Original proposal:

114 objections received which can be summarised as follows:

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

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

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

1 representation received

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

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

1x72 signature petition of objection received on the following grounds

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

4 additional letters of objection received:

- Site is within or adjacent to an ancient woodland

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

## Response to Representations

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

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

### **Special Planning Committee 11/06/15**

#### **Petitioner: Betty Ballman**

*First may I ask all committee members to read in full Representation 43326. It is a professional appraisal of land at Clyne Common, off Chestnut Avenue, West Cross (Candidate Site WC004). It was carried out by CDN Planning (Wales) for Mumbles Community Council.*

*I quote one line from the conclusion of that report, paragraph 10.2. This report finds that there are several reasons why this site is not a suitable or sustainable housing allocation.*

*The report draws attention to possible flood risk. Please note that there have been repeated events of flooding at the bus stop on the Common side of Chestnut Avenue near the junction with Mulberry Avenue. Highways could not stop the water coming off the common and so installed a raised platform for bus passengers to stand on. Highways may have a record of this work.*

*Candidate site WC004 lies at the foot of sloping marsh land. This land has rising springs and is slow to drain. If in order to build on this land it must be drained, the composition of the land will change and all flora and fauna dependant on wet land will die. In other words a small but sad ecological disaster.*

*The public have a right to walk registered common land and the West Cross petitioners ask the committee to note that this section of Clyne Common, off Chestnut Avenue is the only adult recreational amenity available to residents at this location of Upper West Cross.*



*It has been brought to my attention that there is a need for affordable housing so that young people can get a foot on the housing ladder. To assess the extent of this need I checked the 574 candidate sites for a similar need and found only one other site MA0001 which calls for affordable housing. Combined with site WC004 it works out that only 0.35% of Candidate sites have claimed this particular need. Does this percentage justify building on sensitive registered common land.*

*May I, with respect, add that the UK Government scheme to provide financial help for young people to get a foot on the housing ladder sits comfortably alongside the England Right to Buy Scheme. However many Council tenants in Wales have had their hopes of owning their own home quashed by the Welsh Government decision to close the Right to Buy scheme. Is it fair to run a scheme for the young that is based solely on age because it is what they want but not necessarily what they need.*

*I believe there has been a good record with West Cross privatized council flats and houses being passed on to younger people either to buy or to rent.*

*Perhaps there could be a way of encouraging this trend.*

*I close with one simple statement:*

*Clyne Common is an Area of Outstanding Natural Beauty and should be registered, accordingly.*

*Finally, farming is a business activity. Farm land has been bartered, bought and sold since farming first began. It has no connection with taking common land.*

## **Developer Representations at Special Planning Committee 11/06/15**

### **Site Promoter: Geraint John**

*As Members will be aware, the Council seeks to allocate land off Chestnut Avenue as a 'Gower Fringe (Affordable / Older Persons) Housing Site'. It is evidence within the Council's Strategic Housing Market Assessment, which supports and underpins the emerging LDP, that there is a pressing need for such accommodation.*

*The LDP Preferred Strategy identifies that the only opportunities for housing in this part of the City are through small scale rounding off 'Rural/Urban Fringe Extension' sites (such as this).*

*Importantly the allocation of this site would 'free up' under-occupied homes in the settlement, and provide much needed 'churn' to the housing market in this part of the City.*

*The proposed allocation, which has of course been rigorously assessed by Council Officers through the Candidate Site process, is located immediately adjacent to the settlement, with a number of key local facilities and services being accessible by walking, cycling and public transport.*

*The site is subject to Common Land designation, and therefore in order to release the land for development, replacement common land will be necessary. Such replacement land, of equal (if not better) quality and quantum can and is being proposed and secured. The wider benefits derived from the allocation of the site in order to provide much needed affordable housing are considered to outweigh the small loss of common land – not least given the compensation measures provided.*

*The site is not within the AONB, nor is it subject to a Greenbelt designation. The site does fall within the Clyne Common Site of Importance for Nature Conservation. In addition, any scheme will be appropriately configured and designed to ensure the Swansea Bay vista achievable across the site is maintained and not interrupted. It is important to note that the site area defined occupies a low lying position, and therefore visibility of the site within the open landscape will be limited.*

*The southern boundary of the site is formed by Chestnut Avenue onto which a new junction will be formed in order to provide access to the site. An initial highway assessment has been undertaken by appropriately qualified professionals which indicates that there are no highway capacity issues in the surrounding road network. The extensive frontage on Chestnut Avenue and Mulberry Avenue provides significant opportunity for new accesses to any future development. Although further highway assessment work can and will be provided in due course highway considerations are not considered to represent a fundamental constraint to the development of the site, not least given the highly sustainable and accessible location of the site. This is a position confirmed by the response of the Highway Department – subject to retention of existing rights of way and provision of new pedestrian facilities.*

*The site is not subject to any fundamental environmental designations or constraints, albeit it is acknowledged that the land has, akin to any Greenfield site, ecological sensitivity. Accordingly, an ecological management plan will be needed and will be put in place in order to assess and demonstrate how the loss of priority habitats would be compensated for. Again, this is not considered to represent a fundamental constraint to the deliverability of the site.*

Services, utilities and drainage serving the site are available and have adequate capacity, thereby ensuring the deliverability of the site. The site is outside of any flood zone, and appropriate drainage work and measures can and will be incorporated in order to ensure no adverse impacts.

In light of the above, the proposed allocation of the site presents a suitable, viable and deliverable development opportunity that can provide for, and is wholly in line with, the policy provisions and aspirations of the Plan. Accordingly, the site will make a significant contribution to achieving the housing aspirations for much needed affordable and older persons housing in the Gower fringe area, and it is respectfully requested that the site's continued allocation in the Plan is endorsed as such.

### Key Stakeholder Consultations

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

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

Western Power	<p>Western Power Distribution (WPD South Wales) presently have fifteen 33/11kV substations and two 132/11 kV substation providing electricity supplies in the Swansea area..... There is currently spare transformation capacity at each of the substations, which may be able to accommodate future load growth. However, please be aware it may be necessary for reinforcement works on the 132kV and 33kV network supplying these sites to be carried out, to enable the space capacity at the EHV/11kV transformation sites to be released.</p> <p style="text-align: center;"><b>Swansea Primary Substation Demands 2011</b></p> <table border="1" data-bbox="685 564 1816 673"> <thead> <tr> <th data-bbox="685 564 1061 639">Substation (EHV/11kV)</th> <th data-bbox="1061 564 1440 639">Firm Capacity (MVA)</th> <th data-bbox="1440 564 1816 639">Maximum Demand (MVA)</th> </tr> </thead> <tbody> <tr> <td data-bbox="685 639 1061 673">West Cross **</td> <td data-bbox="1061 639 1440 673">14.6</td> <td data-bbox="1440 639 1816 673">10.5</td> </tr> </tbody> </table>	Substation (EHV/11kV)	Firm Capacity (MVA)	Maximum Demand (MVA)	West Cross **	14.6	10.5
Substation (EHV/11kV)	Firm Capacity (MVA)	Maximum Demand (MVA)					
West Cross **	14.6	10.5					
Coal Authority	No coal mining legacy features identified by the Coal Authority.						
Bishopston Community Council	<ol style="list-style-type: none"> <li>1. Common land requiring deregistration.</li> <li>2. Includes land not in the ownership of the agency who has registered this land as a candidate site.</li> <li>3. Loss of green wedge between Copley, Murton and Mayals/West Cross.</li> <li>4. Will require provision of land of equal area for those individuals who have "rights of common".</li> <li>5. Common used by commoner with ponies and occasionally cattle and sheep.</li> <li>6. Trans-Atlantic cables are situated in verge on south side of common.</li> <li>7. No services presently available.</li> <li>8. Public footpath crosses from Mayals Road, Clyne Common to West Cross.</li> </ol>						

Mumbles Community Council

Preferred Strategy

This objection is based on the identification on the key diagram of a 'limited rural/urban fringe extension' in the vicinity of West Cross - and also the reference in paragraph 6.50, which states:

"There are however opportunities for small-scale settlement boundary amendments at appropriate village and urban fringe locations, in instances where the existing character of the village or settlement would be maintained or improved. Any sites allocated would generally amount to less than 4ha in total, although there is potential for larger sites within the northern part of this Zone. Controlled village/settlement expansion is the only viable way of delivering affordable, local needs housing. Opportunities have been identified at Scurlage, Pennard, Bishopston, Langland, Newton/West Cross, Dunvant, Three Crosses and Penclawdd/Crofty."

At this stage of the LDP process, it is of course the case that no specific sites of this scale have been formally identified for residential development. However, it is likely that any future decision will be to include site(s) that have been promoted as part of the candidate site process.

In specific reference to West Cross, the only candidate site that it on the western fringe of the built-up area is WC004 that covers much of Clyne Common. As common land, this area should not be developed. Further issues, such as landscape, biodiversity and the general relationship between the urban and rural areas further dictate that this land should not be developed.

We note that this land has been rejected by the LPA via the Stage 1 Assessment of Candidate Sites and we support this decision. However, it therefore leads to uncertainty over what land the Council may have in mind for this area.

For the avoidance of doubt, the Community Council's objection to development on the fringes of West Cross would probably apply to any other site that hitherto has not been promoted via the Candidate Site process.

It is noted that the Transport and Access Topic Paper within the evidence base explains that the wider road network in Mumbles is already at capacity in several locations (paragraph 5.79), which is supported by anecdotal evidence from the local community and Community Council.

Moreover, there are pollution effects in Mumbles (see paragraph 5.80 of topic paper) that as a consequence of the volume of traffic would be further exacerbated by the quantum of development that the Preferred Strategy suggests is possible at West Cross.

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

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

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

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

WC004

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

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

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

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



West Cross does have a range of community facilities and services, however these are not as prevalent as in most other wards. As shown on the LPA's Ward Profile there is a medical centre and pharmacy on West Cross Lane (approximately an 800m walk away, via two steep hills). Whitestone Primary School is a 750m walk to the south. Aside from these facilities, most local services are found towards the seafront - almost 1,500m away via steep streets. The site is served by bus stops, which are located directly outside the site on Chestnut Avenue. These are served by a half-hourly service between Oystermouth and Swansea bus station.

The site currently has no vehicular access. However the road network in the local area appears reasonable, albeit there are topographical constraints and a number of complex, tight or hilly junctions that are not conducive to significant increases in traffic.

A search of the LPA's online planning register shows no recent planning applications affecting this site. It is worthwhile to also mention the site's status within the extant Unitary Development Plan: it is designated as green wedge and as common land, as well as being open countryside.

The Preferred Strategy made reference to opportunities for development on the urban fringe of West Cross including identification on the Key Diagram a 'limited rural / urban fringe extension' in the vicinity of West Cross. At the time WC004 covered much of Clyne Common, including the smaller site that this report now assesses. The consultation response pointed out that the site was common land and should therefore not be developed. The response also mentioned issues including landscape, biodiversity and 'the general relationship between the urban and rural areas' which further suggested that the site should not be allocated. It should be noted that the LPA rejected the larger Candidate Site during the Stage 1 Assessment of sites.

It was pointed out that MCC would likely resist other new development elsewhere on the fringes of West Cross, especially on countryside sites, and that the settlement boundary should be retained in its current location. Further reference was made to the available evidence base, which identified transport and access constraints within the entire Mumbles area and the highly sensitive landscape surrounding Mumbles, including West Cross / Clyne Common. Identified issues that in the opinion of MCC must be addressed should any major development be allowed in this vicinity, included access to community facilities, effects on watercourses, drainage,

sewerage and flood risk. It was also suggested that the LPA ought to consider the likely planning obligations that would be required in the West Cross area in order for major development to be acceptable without causing any detrimental effects on the area.

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

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

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

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

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

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

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

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

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

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

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

It is also evident that the site is designated as common land. This has considerable consequences. Firstly, it complicates the process of securing planning permission and will require separate applications to the Planning Inspectorate. Secondly, there are likely a variety of rights afforded to commoners, the community and / or the public regarding access and use of the common land. The proposed allocation is contrary to established planning policy that aims to protect common land from prejudicial development. Not only will there be a loss of common land but there will be a significant negative effect upon users of the land.

The site originally formed part of a larger Candidate Site, but this has been amended in size. There have been at least 100 objections to the site: the content of the objections tend to be applicable to both the larger site and the current, smaller, site. The site failed the LPA's Stage 1 Assessment because, as set out in Appendix A of the LPA's report to Committee in March 2012, the site was "100% protected habitat." In August 2014 the LPA reported that Candidate Site WC004 had been placed on the 'C-List', i.e. "sites are subject of fundamental constraint, not of sufficient scale to be allocated within the Plan (less than 10 units), have been withdrawn in full for various reasons, or have been rejected/withdrawn in part. These C-list sites will not feature as allocations in the LDP." It is apparent that part of the site was withdrawn (presumably by the landowner). As of December 2014 it is now evident that the LPA have considered the amended site to be capable of being allocated.

It is noted that the report to Committee (December 2014) says that where any proposed allocation does not get carried forward to the Deposit LDP, compensatory alternative provision will be sought within the same Strategic Housing Zone. This in itself needs fully justifying, as it is not inconceivable that more sustainable sites in a different housing zone should be preferred to sites in the west zone (i.e. Mumbles and Sketty) that have already failed to be allocated.

It is evident that there are serious flaws in the proposed allocation of this site for housing. Most obviously it will involve the loss of common land. This is not solely a problem due to the direct loss, but also because of the consequential effects upon users of the common and the public rights of way (and open access land). This alone should be reason to resist the loss of more than a hectare of common land. Moreover, due to the complex nature of common land law, there is a not insignificant chance that the site would not be developable or deliverable even if allocated.

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

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

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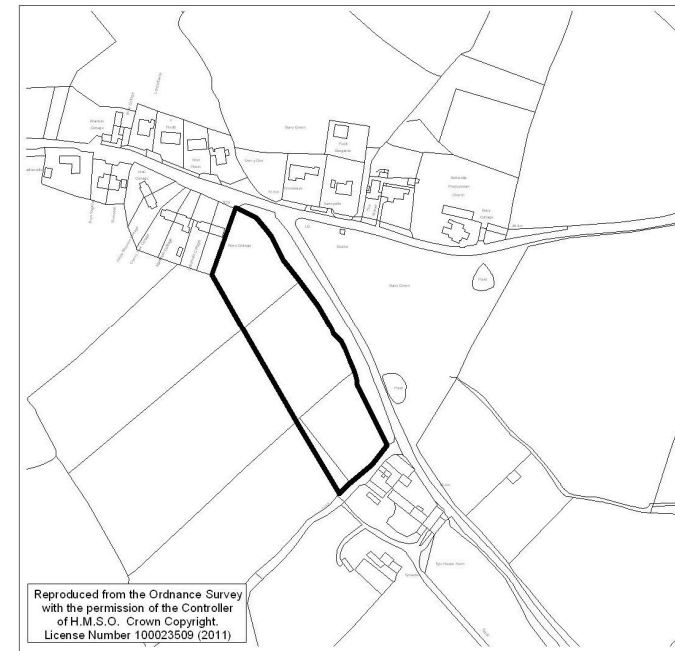
**Stage 3A: Assessment Against LDP Objectives**

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

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

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

<b>Reference</b>	<b>GW010</b>
<b>Name</b>	<b>Land at Tyle House Farm, Burry Green, Gower</b>
<b>Description</b>	Rectangular section of field 0026, alongside the unclassified road which runs from Burry Green to Knelston and located opposite Bury 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.
<b>Size</b>	0.96 Hectares
<b>Existing Land use</b>	Agriculture
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





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

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

No petitioners

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.

- 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.

## 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>

	<p><u>Gowerton Comprehensive</u>: Although there is sufficient capacity at Gowerton School, a large majority of this is within timber demountable classrooms. Due to the number of sites that could potentially impact on this school there would be a requirement to extend and significantly remodel the provision. Increasing pupil numbers from the North Gower would impact on transport costs and bus bay provision. There is also concern on the impact of both Gowerton School and YG Gwyr on the highway infrastructure in Gowerton and further consideration may have to be given to restricting the size of these schools and/or the requirement of a new site for either provision.</p>
<b>External Stakeholder</b>	<b>Comments</b>
Natural Resources Wales	<p>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>

	<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.

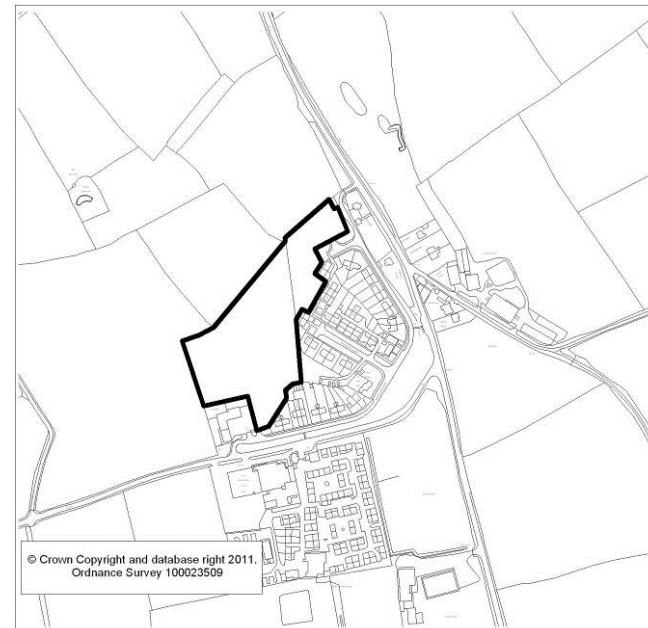
### Stage 3A: Assessment Against LDP Objectives

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

### 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	-	?	?	++	?	?

<b>Reference</b>	<b>GW023</b>
<b>Name</b>	<b>Land at Monksland Road, Scurlage [CCS Site]</b>
<b>Description</b>	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
<b>Size</b>	2.16 Hectares
<b>Existing Land use</b>	Undeveloped Land
<b>Proposed Land Use</b>	Residential
<b>Location Plans</b>	OS Plan and Aerial (not to scale)





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

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

No petitioners

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

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.

- 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

## 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 substandard 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>

	<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>
<b>External Stakeholder</b>	<b>Comments</b>
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>

	<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"> <li>1. Land is agricultural and is located within the AONB; the proposed change of use would be contrary to the UDP.</li> <li>2. This land is already in Council ownership and has been identified for growth of the Scurlage community. This should be the preferred policy.</li> <li>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.</li> <li>4. The drainage/sewage facilities serving this area are routinely overloaded.</li> <li>5. The electrical supply serving this area is presently overloaded.</li> </ol>
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.

### 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	+/-	?	?	-	?	?

