

## APPENDIX 2: REPRESENTATIONS RECEIVED FROM PETITIONERS AND SITE PROMOTERS

### Central SHPZ

### Castle

### CA013 Site 9 Trawler Rd, Maritime Quarter

#### CA013: Mr Woolliscroft (petitioner)

I would like to explain why Site 9 is so important to the residents and why its continued inclusion as a development site does not comply with your own planning guidelines. The Candidate Site Assessment Report is factually incorrect and misleading on many points. I have provided an amended copy that actually follows the Draft LDP policies.

I can't cover this in 5 minutes but full details have been provided in the MQRA report.

The residents feel very strongly about how their area develops. We would like to see a sustainable vibrant, healthy, mixed community with an emphasis on families and work. This is only possible in a sustainable environment, a point clearly stated in your draft LDP and confirmed by Planning Policy Wales guidance, the Strategic Framework Review and the Open Space Assessment.

Site 9 has been used as an amenity area for many years. The homes in the Maritime Quarter do not have gardens and Site 9 is the only local area available for small children to run around or play with a ball in safety. In the summer it is the only area where dogs are allowed run off lead. The raised area is often used for picnics, by disabled people who can't access the beach or for people to just sit and enjoy the view.

At the recent Village Green Public Inquiry it was accepted that Site 9 was used as an amenity area and when the Public Rights of Way and Commons Sub-committee confirmed the inspector's decision, they expressed the Committee's concern regarding the lack of alternative open space for recreation in the area. A point omitted from the Candidate Site Assessment Report but it does recognise that Site 9 is a green space and an amenity area.

It is not a brown field site. Planning Policy Wales figure 4.3, defines previously developed land and it also defines what land is excluded from this definition.

The relevant exclusions are:

1. Land where the remains of any structure have blended into the landscape
2. Previously developed land put to amenity use.

Clearly, Site 9 meets this criteria and therefore is not a brownfield site.

In the report I show that any future development on Site 9 would be small, with less than 30 flats. For the sake of less than 30 flats, any development will have negative

impact on the health and well-being of a few hundred residents, according to the Open Space Assessment and TAN 16.

Your **draft Local Development Plan** fully supports our arguments. Some Quotes:

- *“Development that unacceptably compromises the extent and quality of green infrastructure provision will not be supported.”*
- *“Create environments that encourage and support good health, well-being”*
- *“Development must contribute towards the creation of sustainable, active and vibrant places that benefit from a mix of appropriate uses and access to open space”*
- *“The starting point for any development should be to look beyond the site and establish how the proposal fits into the existing community and surrounding context. It is essential that all new development is positively integrated into the wider community in respect of design, layout and land use...”*

The last point is all we are really asking for

Planning Policy Wales guidance Section 9, Housing refers to:

- *“attractive landscapes around dwellings, with usable open space,”*
- *“the creation of places to live that are safe and attractive.”*
- *“Insensitive infilling or the cumulative effects of development should not be allowed to damage an area’s character or amenity”*

Section 4, Planning for Sustainability has many more references that support retaining Site 9

- *“Putting people, and their quality of life now and in the future, at the centre of decision making;”*
- *“Good design is essential to ensure that areas, particularly those where higher density development takes place, offer high environmental quality, including open and green spaces.”*
- *“Planning policies, decisions and proposals should: Promote access to ..... open and green space, maximising opportunities for community development and social welfare”*

**Technical Advice Note 16 and the Open Space Assessment; which I will just touch on.**

The provision of Fields in Trust in Castle Ward is 0.1 hectares/1000 population compared to a TAN-16 recommended standard of 2.4. Less than 5% (— 0.1 and 2.4) The worst provision in the County and I couldn’t find worse in the UK after searching for an hour. TAN 16 states when referring to open space **“Only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered.”** There is a serious deficiency in all aspects Fields in Trust amenity areas which can only be addressed by confirming Site 9 as an amenity space

**CA013 Mr North (Site Promoter)**

This site was acquired for regeneration purposes many years ago as part of the

Marina regeneration project which at the time of acquisition was a largely derelict industrial area associated with the former docklands. The site has always been considered to be a development site and SPG exists in the form of development briefs dating from 1989 onwards which is currently being updated with a view to marketing the site together with the Sailbridge site later this year. The site was considered by the developer of the former Spontex site for inclusion within their scheme but was ultimately not pursued. The site was used in connection with the Swansea Point development, as the former Spontex Site became known, as a sales office with parking facilities. At this time the adjoining land was landscaped by way of grassing to improve the appearance of the area whilst sales of the adjacent residential apartments was ongoing. The site of the sales office was also grassed upon vacation of the sales suite from the site. I could be argued therefore that the site became an informal green area by accident rather than design as it has always been considered to be a development site and is currently aligned with the City Centre Framework proposals to link the city to the sea. The site was the subject of a village green application in recent years however the inspector found in favour of the Council's challenge rather than the applicants. The site is currently largely used as unauthorised car parking by visitors and/or workers in the locality.

## **Llansamlet**

### **LS023, Fredrick Place**

#### **LS023 Mr Thornton (petitioner)**

My family has been resident in Llansamlet for over 48 years and has seen many changes. Originally it was the main road to Skewen and then it was blocked off when the motorway was built. In the 70's the farm land behind Eileen Road was developed and a school and many houses were built. As the families expanded so did the need for housing. Hale construction built a large number of bungalows and soon Frederick Place started to get busy.

Around 2000 the Council approved the building of low cost housing near to Crymlyn Quarry, which added more congestion at the bottom of Frederick Place. The Welsh School was also demolished and more low cost homes were built. I believe that Frederick Place is now at full capacity, the schools are full and the Medical Centre has over 10,000 patients.

During rush hour the junction between Bethel Road, Frederick Place and Peniel Green Road is very busy and it can take up to an hour to ease. The Medical Centre has recently been updated and had lost many parking spaces, which then forces patients to park on Frederick Place when using the Doctors. Also members of the local bowling club, park at the bottom of Frederick Place on both sides of the road, which causes problems for buses turning into Frederick Place at the junction of Bethel Road.

I was recently advised by a local builder than many years ago, a contractor was denied planning permission to build on the land, due to the Mine Workings. The

recently built Medical Centre extension was also delayed because of the same problem. The Peniel Green railway tunnel runs underneath, which carried freight and passengers on a regular basis, it also has air shafts on each side of the tunnel.

At a possible site entrance for the development, is the main bus stop for Frederick Place. It is the only bus stop in Llansamlet, where the bus waits for its passengers. It waits for 3 minutes on weekdays and then 6 minutes on the weekend. It is not possible for the bus to wait at any other bus stops in the area, as they are near to shops or homes.

The fields behind our properties are not flood free. If it rains the water rises in our back gardens. We have experienced over many years, 5-6 inches of rainwater, almost up to our back door on one occasion. The culvert is always full of water, as most of the rainwater from the bungalow runs in to it. The culvert behind our garden is lower than the one that diverts water from the middle of the field, so ours has to fill up considerably before it is able to drain away. The pipework which wakes the flow of water under the houses further down the hill is too small and backfills, so the water cannot drain away easily after a heavy rainfall. This has been an issue since the 70's and on a couple of occasions the Council have had to use pumps to clear the water. We have photographic and video evidence of this should you wish to see it (refer to file for photographs).

We know from your report that you are aware that the site contains Purple Moor Grass and Rush pasture, which is becoming scarce in this country. We have a wealth of wildlife and have seen heron's, foxes, newts, birds of prey and bats.

We feel that this development along with Talycoppa Farm will stretch Llansamlet and Frederick Place to breaking point. Please note that we wish for a representative of the residents of Frederick Place be present at any future development planning meetings.

Thank you for taking the time to listen to our concerns.

#### **LS023 Mr Bacon (Site Promoter)**

The City and County of Swansea is under considerable financial pressure and is constantly reviewing all its land and property holdings. Consequently large holdings of land that are not held for operational purposes have been put forward as part of the candidate site process.

The land in question comprises approximately 2.3 hectares and the potential for development was established in the previous Unitary Development Plan.

It is within an existing residential area with potential for development. The land is not public open space and is presently let for grazing horses. There is considerable difficulty with regards to fly-tipping due to the fact the Council cannot proactively manage the site and has no resources to do so.

There may be an opportunity to development some recreational greenspace in the

development and there is also an opportunity to improve drainage in the area as a result of a development.

Highway access would be directly from Frederick Place with retained access for a pedestrian footpath.

It is accepted that the site has restrictions and there would have to be a buffer to the railway tunnel.

## **North SHPZ**

### **Cockett**

#### **CO013: Land Adj Cockett Pond**

##### **CO013 Mrs Crossley (petitioner)**

My name is Val Crossley, a resident of Church Gardens and I am here today to speak on behalf of many Cockett residents objecting to the proposed development plan on land known as Cockett Pond.

In 2011 a blue notice was attached to a lamppost in Church Gardens informing residents of the proposed construction of 77 houses on this land, which access to and from the new estate via Church Gardens. It is assumed that officers from the Planning Department had previously visited both the site and Church Gardens. They will have observed that access to Church Gardens is limited and only sufficient for the existing estate. The idea of access to an additional 77 houses via Church Gardens is not feasible due to the lay of the land. I would suggest that committee members visit the site and see for themselves where access could be feasible for the new estate.

We have received no further information since 2011 when the petition was drawn up. An access route to a new estate of 77 houses via Church Gardens would be a problem of monumental proportion. The volume of traffic and disruption caused by vehicles to and from the new site would have an impact on the lives of the residents.

The land in question has been a haven for flora and fauna for many years. Wildlife, nesting birds, insects and wildflowers are in abundance on this land. We are constantly being reminded through the media of the importance of protecting wildlife habitat. We should be proud and celebrate the natural history we have in our area. It is our responsibility to protect it and accommodate it. At the last count there are over 34 varieties of wildflowers growing on the site.

Farmers are setting aside pockets of their land in order to encourage wildlife to return. Farmers are prepared to make the sacrifice of losing land for the sake of our wildlife surely the same should be done in our towns and cities. We should encourage wildlife and nurture it, not destroy it.

This land known as Cockett Pond should remain as it is a wildlife haven and not a housing estate,

I hope, Mr Chairman, that you will agree to a site visit to see for yourself access and egress for the proposed development and that you will consider the issues and objections raised.

Thank you for giving us this opportunity to voice our concerns.

#### **CO013 Mr Bacon (Site Promoter)**

The City and County of Swansea is under considerable financial pressure and is constantly reviewing all its land and property holdings. Any land which is not required for operational purposes has to be considered for disposal.

The land is not currently proactively managed by the Council and there are no proposals to increase or improve any management due to lack of available funding.

It is not currently open space, but it is within a fenced area used for unofficial horse grazing.

The land at Cockett Pond extends to approximately 2.87 hectares, it is understood that a development of approximately 50 units would be recommended with access improvements being necessary at the road junction subject to Highway's comments. As a result of this development there could be scope to improve public rights of way, or access, the provision of a buffer to the current industrial estate and potentially additional recreational facilities. This detail would be established at the time of the submission of any future planning application.

## **Greater North West SHPZ**

### **Gowerton**

#### **GT005 Former Gorwydd Colliery, Gorwydd Rd**

##### **GT005 Mr Higgon (petitioner)**

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 Waunarlwydd \ 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
<b>Total Loss of Woodland</b>	<b>6.30 Hectares</b>

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, Waunarlyydd (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 Waunarlyydd & Killay / Duvant

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.**

#### **GT005 Philippa Cole (Site Promoter)**

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.

## Penllergaer

### PG002: Land at Parc Mawr Farm, Penllergaer

#### PG002 Mr Harris (petitioner)

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

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

The Preferred Strategy said of this site that “*This proposal is predicated on the delivery of a new road*” and “*has the potential to alleviate congestion in the area ...*“. This statement is based upon comments made in the Council’s own “Topic Paper” on transport dated August 2013.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **PG002 Robin Williams (Site Promoter)**

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

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

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

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

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

- It would achieve a more comprehensive form of development, allowing not only for a new school but for additional community and commercial uses which would form a hub which would also link with existing facilities in the area
- A link road – connecting the A4240 Gorseinon Road with the A483 – would be provided which has the potential to remove through traffic along the A4240 and A48 through Penllergaer, the potential link will also relieve congestion at Junction 47 of the M4.
- The development would avoid encroachment into the more exposed landscape areas to the south. It would also allow ecological mitigation on land to the south which would remain undeveloped.
- It would provide a site which would allow Bellway Homes to develop in the

Plan Period up to 2025 for a range and choice of housing opportunities at building rates experienced on their current Parc Penderri site to the north of Gorseinon Road. It would therefore form a major contribution to meeting the 5 year housing land supply shortfall which currently exists in Swansea.

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

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

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

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

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

The points made by officers in response, which are included in the site schedule, appended to the Committee Report, adequately address these concerns. However, Bellway Homes continue to acknowledge that further work is needed. With this in mind detailed studies have already been commissioned which will contribute to the LDP evidence base and which will further justify the site's selection. It is also anticipated that these will allow further clarification of matters raised, particularly by the Key Stakeholders.

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

## Pontarddulais

### PT002: Land north of Pontarddulais

#### PT002 Dr Susan Barnes (petitioner)

Pontarddulais is a semi-rural community which has borne the burden of significant development over the last decade. According to the ONS, the population of Pontarddulais has grown by 23% since the 2001 census and this has largely been as a result of new housing development. Pontarddulais schools (and indeed their neighbouring ones) are virtually full and Pontarddulais primary is now one of the largest primary schools in Swansea. At Ysgol Gyfun Bryniago class sizes are well above the national average and given the proximity of the schools, traffic congestion during school start and end times is notorious. The GP surgery is already struggling to cope with the demands of the population growth since 2001- as anyone who has had to participate in the 8am battle for a same day appointment will testify - recruitment of suitably qualified staff, as well as the limitation of physical facilities being an issue. At rush hours the one way system in the centre of Pontarddulais is gridlocked – and the two main exit points onto the motorway at Penllergaer and Hendy are backed up causing traffic queuing and long delays. The existing sewerage system is overloaded and does not meet existing demand.

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

Consultation with the community thus far has been desultory. Time will tell if it has followed the minimum legal requirement – but even if it is proved to be legally compliant, as residents and council tax payers we expect more. The LDP process and the expertise and knowledge required to engage with the process is heavily biased towards professionals and developers. A public consultation which hides behind jargon, provides scant information in an accessible format and which requires ordinary citizens to go above and beyond what can be reasonably expected of them is no consultation at all. As a resident of Glanffrwd Rd – some 15 feet from the north end of the 500 unit housing estate on greenfield sites that Persimmon would like to impose on us – I can confirm that there has been scant communication with residents.

A small number of residents had heard about the early LDP consultations a number of years ago and registered for email updates. The majority of residents, including those who have moved in over the last year or two, only found out about the proposals as a result of a chance encounter with a member of the Town council – only to be informed that the public consultation held, incidentally, over the “good time to bury bad news” December period was closed. Eventually someone managed to



track down a photocopied and dog eared leaflet produced by Persimmon entitled “North Pontarddulais Vision” – which can only be described as a spin doctor’s valiant attempt to sell the advantages of turning Pontarddulais into a concrete jungle. It artfully told us that 30% of the development would be on brownfield site – somehow neglecting to mention that this meant that 70% of the development proposed would be on our green fields.

As someone who was naturally rather alarmed and surprised that such massive development proposal– including a 500 unit housing estate in the middle of Pontarddulais –could have reached the end of a consultation without having even heard about it, I undertook to try and find out more about it on the Council website. Not having had much luck, I then tried to find out whom to ring at the Council, but hit a brick wall. But I did find an email address to an anonymous shared email inbox. Undeterred I proceeded to write an email airing my concerns and asking a number of detailed questions about the process. My email, perhaps not surprisingly, went unacknowledged, though some seven weeks later I found myself the recipient of a round robin email thanking “those who had responded to the consultation” – which was clearly not me as the process had passed me by - and providing some bland “planning speak” information about the next stages. Which all goes to leave myself, my neighbours and fellow Pontarddulais residents bewildered and asking how, in the era of multi-media communication, where there are serious concerns about getting people to engage with the democratic process, can proposals which have the potential to massively impact our community slip under radar almost unnoticed via a complex and opaque technical planning process?. It appears that open, accessible and even handed debate is not a priority – meaning that the scales are massively tipped in favour of planning professionals and developers.

The scale of the proposed development in Pontarddulais represents a significant threat to a semi-rural, predominantly Welsh speaking community which has absorbed its fair share of housing developments over the last decade. The greed of developers who will, if unopposed, gobble up swathes of greenfield sites and maximise their return on investment by erecting as many houses as they can get away with, shouldn’t be a surprise. However we expect better from our elected representatives – and the officers who serve them. This council professes to support communities and one of the mainstays of the council’s own plans to cope with its

£80 million spending shortfall, is to look to communities to take up the slack. You call it Sustainable Communities. Foisting in excess of 700 homes on us, massively expanding our resident base by a third, building over nearly all the green spaces within the Pontarddulais boundary and burdening our infrastructure beyond breaking point is not about sustaining communities, it is about destroying them. The residents of Pontarddulais deserve and expect better. Please do not let us down and vote to reject this proposal.

#### **PT002 Pete Sulley and Chris Jenkins (Site Promoters)**

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

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

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

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

### **Pontarddulais**

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

### **Technical Studies**

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

### **Concept Masterplan**

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

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

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

### **The Proposed Link Road**

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

cyclists. Development of the allocation site will therefore secure this much needed new infrastructure to the benefit of the whole of Pontarddulais.

### **Welsh Language**

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

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

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

### **Education**

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

### **Conclusion**

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

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

### **Persimmon Homes**

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

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

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

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

### **PT017: Land at Bolgoed Rd, Pontarddulais**

#### **PT017 Dr Susan Barnes (petitioner)**

Comments made in relation to PT002 also apply to this site

### **Upper Loughor**

#### **UL002: Land at Heol Pentre Bach**

##### **UL002 Francis Sinfield (petitioner)**

As residents we were assured of no further building development on a designated green belt and a triple SI site protected under EU law due to its proximity to the Loughor Estuary. Planning consent has been refused in the past.

The new development of Parc Llys Gwynfaen and its continued spread along Gower View Road is causing a danger due to the increase of traffic on Brynafon Road. It's junction with Frampton Road is a potential death trap along with the junction at Heol Pentre Bach with its access to Queens Gate. Traffic calming measures on Frampton Road are a great irritant to the community also causing multiple diesel toxins which are now responsible for more than 50,000 deaths in this country.

Junctions on Borough Rd pose the same problems. Vehicles are parked on pavements as the roads are too narrow posing a danger to pedestrians.

The Fire Brigade was unable to attend to a fire at Clos -y-Morfa due to the narrowness of the road as a car was parked on one side, there are no pavements here.

Areas from Loughor Bridge, Loughor, Gorseinon up to Penllergaer are developing into a huge car park due to traffic hold ups. The road along the Hospital is chaotic.

Traffic lights at Loughor and at the lower end of Gorseinon cause the side roads to

become "rat runs" We are a community which could easily become a commuter town.

The whole infrastructure is inadequate.

Overcrowded roads, schools, Health Centres, Dental Practices and Hospital. Doctors are leaving due to stress

One surgery now has one part time doctor and locums when previously employed four full time staff. Does not bode well for patient care

We are in danger of losing our identity language and culture.

Further building will exacerbate the problem with sewerage systems. Present pumping systems are not coping. An increase in surface water will cause further problems.

The land concerned falls down onto Gwynfe Rd which is already a flood plain. Impassable at times due the back up of tidal water and rain. The ditch opposite the Care Bungalow fills with orange gunge, polluted by iron ore from flooded mines.

This area is an essential habitat to migratory birds, varied wild life and indigenous plants. Otters and seals have returned to the Estuary. The Osprey on its migratory flight northwards catches fish and flies to the trees in this field to eat its catch. Bats, Newts, Owls, Foxes and Badgers inhabit the area. It is illegal to destroy Badger setts.

Building permission in the past has been refused. A triple SI site cannot suddenly lose its status.

Life in all aspects is a precious gift. Quality of life should be a priority before profit.

These green areas are our lungs and must be preserved. Once gone they cannot be returned.

#### **UL002 Robin Williams (Site Promoter)**

I represent Elan Homes who wish to see a high quality form of residential development on the site, which will contribute to Local Development Plan objectives for meeting housing need in a satisfactory and sustainable manner.

In December 2010 Asbri Planning Limited submitted a candidate site request that the site be included as an LDP housing land allocation. The submission emphasised that the site is

- well related to the existing pattern of development,
- has no major constraints,
- can be accessed of the existing road network
- and is located within walking distance of a range of facilities, including primary and secondary schools.

The submission demonstrate that the site meets established site selection criteria incorporated both in Planning Policy Wales and in the Candidate Site Assessment Methodology published by the City and County of Swansea.

The Local Development Plan Preferred Strategy acknowledges that the scale of housing required in the City and County of Swansea is not capable of being accommodated on previously developed land without the need for the identification of settlement extensions including green field land.

In order to achieve a sufficient range and choice of housing land opportunities, there is a need to consider selective sites which represent viable urban extensions, which do not involve a significant intrusion into the countryside in landscape terms, and which are close to existing facilities.

Sites also need to be shown to be deliverable and can contribute to a 5 year housing land supply required by national planning policy. Currently there is a major shortfall of readily developable land in Swansea, with only 3.3 years identified.

Gorseinon is part of the Greater North West Swansea Housing Zone which is the largest of the Strategic Housing Policy Zones and has accommodated a large proportion of the City's growth in recent years. The LDP Strategy recognises this and identifies the need for around 5,800 new homes in this zone which will be delivered through a combination of large scale strategic releases and small/medium allocations at settlement edges which constitute appropriate rounding off.

The site at Heol Pentre Bach falls into this latter category. My clients have sought, and are seeking to contribute further to the LDP evidence base by commissioning study information including ecological surveys and a drainage strategy. These further demonstrate the suitability of the site. In summary:

- The site slopes gently down to Heol Pentre Bach. The western boundary of the site is formed by a mature, tree lined hedge. The site is well contained by this feature and by existing residential development at Clos Y Nant to the south and Clos Y Morfa to the north west. Consequently development will have a minimal impact on the wider open landscape to the west.
- There are no overriding ecological issues and where appropriate, existing trees and hedgerows will be maintained and additional planting of native species implemented.
- The site is well related to the to the employment, retail, education and leisure facilities in Gorseinon with good pedestrian and cycle links, including existing rights of way which in turn link with public transport routes. Vehicle access can be easily achieved off Heol Pentre Bach.
- The site can be adequately served in terms of both surface and foul drainage. Attenuated surface water can be discharged into the adjacent stream. It is intended that foul water flows be directed to the nearby Llannant Farm sewage treatment works which has recently been upgraded. Unlike sites which discharge to the Gowerton STW there is no need to identify donor sites.

All in all the development of the site would represent a logical and sympathetic extension to the existing housing development at this location.

I therefore urge the Committee and the Council as a whole to continue to give the site positive consideration through the LDP process.

## West SHPZ

## Killay South

### KS001: Land off Rowan Close

#### KS001 Mrs C Thomas (petitioner)

Here is our petition which summarises the relevant concerns about the new, reduced KS001 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 bogginess 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.'



**SK017 Paul Vining (Site Promoter)**

Thank you for allowing me to address Committee.

**THE LHB's PLANS**

As you will know, the ABMU is responsible for providing health care services in Swansea and neighbouring boroughs.

Cefn Coed Hospital is part of the NHS estate in Swansea and over the last few years ABMU has made a big investment in new mental health care facilities at Cefn Coed. This is in line with the Council's own adopted UDP policies, under which the Cefn Coed Hospital site is already allocated for redevelopment for health care and housing. The UDP allocation is for 200 units. The LDP proposal is for a total of 575 units, of which the Council recently granted planning permission for 73 units on what is termed Development Area A (application no. 2014/0969).

Some patients at Cefn Coed Hospital are still accommodated in the original hospital buildings and will be until new purpose-built facilities are provided elsewhere in the Health Board's area. That will then release the remainder of the Cefn Coed Hospital site for housing later in this decade, well within the LDP plan period of 2025.

ABMU has begun planning for that and, in consultation with your planning and highway officers, has produced a draft master plan showing how the overall site will be developed. An outline planning application is expected to follow next year, after the LDP has been on deposit and after bat surveys at the hospital have been carried out.

Subject to the Council granting planning permission for that application, ABMU will dispose of a large part of the site and proceeds from the sale will be reinvested in health care services and facilities in the Health Board's area.

**PUBLIC CONSULTATION**

In anticipation of a planning application next year, ABMU has agreed to the Ward Member's suggestion that a public consultation event be held in September this year. This will comprise an exhibition of the draft proposals for the Cefn Coed Hospital site, which will give local residents and others an opportunity to discuss them with ABMU representatives and to comment on them before they are finalised and submitted for planning permission.

**MEETING THE REQUIREMENT FOR NEW HOMES**

There is a substantial requirement for new homes in Swansea over the plan period and the Cefn Coed Hospital site can make an important contribution to meeting that need for housing, including affordable housing. (As part of the recent planning permission granted for Development Area A, ABMU agreed to provide 30% affordable housing as well as making a substantial financial contribution to education

and also to local highway improvements.)

### **THE MERITS OF ALLOCATING THE SITE FOR HOUSING**

The site has substantial merits as a site for housing:

1. The site comprises previously developed or “brownfield” land, which lies within the existing built-up area. The development of such land is preferred by national planning policy. It will not involve development in the open countryside.
2. The site is free of flood risk, being located in Zone A.
3. The site is free of any significant environmental constraints. Detailed studies of the site’s ecology, archaeology, heritage, trees, drainage and ground conditions have been carried out already. Further, more detailed studies are being carried out over the Summer. And ABMU has contributed to the Council’s own LDP transport study.
4. The site is already allocated for residential development in the adopted development plan. Allocating the site in the LDP would be a continuation of the Council’s long-standing existing policy as contained in the adopted UDP.
5. The site is included in the Council’s Joint Housing Land Availability Study, and is therefore expected to contribute to meeting housing needs in Swansea in the period from 2015.
6. Development on the site can be accessed and drained satisfactorily, and laid out in an acceptable manner, having regard to topography, site features and neighbouring development and without detriment to local amenity.
7. Although the hospital buildings are not listed, ABMU proposes to retain the water tower – which is a landmark – and to convert some of the existing hospital buildings to residential use.
8. Development of the site will enable it to provide a useful contribution to Swansea’s housing stock in the LDP plan period and in an area that is proven to be attractive to house builders and purchasers.
9. The site is sustainably located and development of the site will be sustainable. The site has performed well in the Council’s own candidate site assessment, including the assessment against LDP objectives and the SEA/SA objectives.

### **CONCLUSION**

In conclusion, Mr Chairman, Ladies and Gentlemen, I would respectfully ask you to confirm the allocation of the Cefn Coed Hospital site for 575 units. It will be of enormous benefit to ABMU’s plans for improving health care in Swansea as well as providing Swansea with much-needed housing land to cater for the city’s housing and affordable housing needs.

## West Cross

### WC004: Chestnut Avenue

#### WC004 Betty Ballman (petitioner)

Firstly may I ask all Committee members to read in full Representation 43326 (refer to JDi. 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 reported 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 is 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 MA001 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 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 privatised 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.

Thank you for giving me the opportunity to speak.

#### **ADDENDUM**

In response to the statement that my house was built on former farmland I made the following comments –

1. I had not taken my full five minutes.
2. 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.

#### **WC004 Geraint John (Site Promoters)**

Good morning Members, my name is Geraint John, planning consultant on behalf of the site promoter – Edenstone Homes.

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 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.

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.

## **Gower SHPZ**

### **Gower**

#### **GW002: Land Adj Boarlands, Port Eynon**

##### **GW002 Mr Herbert (petitioner)**

Good morning, I speak on behalf of a petition by hundreds which was submitted in

2011 with reference to the LDP review, specifically for site GW 002 – Port Eynon.

I am going to speak briefly about this important matter but I have also provided a background document with illustrations from which these comments are drawn.

In order that we can focus on the most critical issues I would like to first deal with the predictably **negative** reasons for rejecting this application:

Spoiling the landscape

Impacting tourism

Impacting residents

Impact on local services including water and sewerage, roads and services

Begin the coalescence of Port Eynon with Overton

Open up the floodgates of further applications based on this precedence

Resulting in the great urbanisation of the unique Gower coastline... once lost, **never** recoverable

Focusing now on **positive** issues to continue safeguarding this national asset, I would make the following observations.

1 Ensure that Gower plays its part of delivering a return on investment for the unique Coastal Path of Wales

2 Recognise the investment in and safeguarding already provided for the highly valuable coastal landscape of Gower and ardently continue with this

We are a small country that needs to maximise our competitive advantage, our coastline is a differentiator for Wales; it's part of what makes Wales one of the top five countries in the world to visit<sup>1</sup>. Developing any part of the Gower coastline would detract from that unique natural heritage<sup>2</sup>.

3 People from the greater Swansea continue to enjoy a local unspoilt amenity and visitors from further afield keep coming back to a familiar landscape that attracted them in the first place

A decision to reject the application will send a positive message that our local representatives care about the same things that the vast majority of their electorate do and that our environment means something more than quick gains for land owners and developers.

4 We do our bit to support the Welsh government's agenda to protect and promote the national parks and areas of outstanding natural beauty of Wales<sup>2</sup> and not undermine this valuable economic engine.

Make a positive investment decision for the next generation of residents in the greater Swansea and Gower area as well as the significant number of visitors to the region by keeping Gower special for the benefit of the many, and not the few. Tourism is estimated to be worth some 6 billion to Wales and Swansea desperately needs its part of this income<sup>3</sup>. Petition for GW002 A Presentation by RH

To be fair, the council has itself described this wonderful asset on its own website<sup>4</sup>:

“Gower-a land apart... A precious landscape whose distinctive character and natural beauty is so outstanding that it is protected for future generations ... “

*Gower was the first AONB in the UK -nothing can change that historical first place but the asset needs cherishing so it still deserves this highly prized honour*

And... sought to protect it thus far:

Three separate planning applications for this site were refused for good reason and those reasons remain as valid today as they have done in the past<sup>5</sup>

Even appeals to the Planning Inspector were rejected on substantive grounds in line with the above comments<sup>5</sup>

The decision to approve this application would be, in effect, an act of coastal vandalism (strong words, but true) - a permanent blight on our unique landscape - something that the people of Swansea would find hard to let go of and forget those that approved it... It would be **permanent**

We therefore sincerely urge the Planning Committee to reject this LDP application

#### **GW002 Mr Attwell (petitioner)**

1. I am the lead petitioner for one of the two petitions submitted. That petition objected in principle to any development at GW002.
2. I believe it is a perfectly acceptable objective on the part of the City Council to promote a new scheme for social affordable housing in Port Eynon. This was previously done some 40 years ago with the development of orchard Close, behind St Cattwgs Church. These houses which are in short terraced blocks of 3 and 4 homes currently sell between £150K and £160K. Of the original 11 houses some 5 are now second/holiday homes or holiday lets.
3. On the map of Port Eynon showing the caravan site to the south east of the candidate site some wooden chalets have recently completed, selling with a price tag “from £135K”.
4. Given that there are significant infrastructure costs e.g. main sewer relocation etc. the likelihood is that the price per unit on this GW002 site will be a minimum of “225K, perhaps more if sold on the open market without constraints. Does this really equate with affordable housing, which in a Swansea context would be between £85K and £100K?
5. A recent real life example is a young couple where the young man was brought up in Overton. Despite wanting to stay in the area to remain close to family and friends, the houses prices here made it impossible and he and his wife have bought a terraced house in Manselton for around £86K. Wages for young people working on Gower are no higher (and in many cases lower as work is primarily tourism or agricultural based and is often only seasonal) than those

working in the city.

6. To guarantee the scheme as affordable housing would require planning constraints similar to those applied some 25 years ago in Llangennith where the sale and resale of the houses was ring fenced to locally employed people who live in the houses as their principal residence. Operation is via a Housing Association.
7. Price creep will almost certainly occur if the GW002 scheme goes ahead, and this would mean the houses becoming second homes or holiday lets. Port Eynon and Horton have an abundance of such properties already. No more are needed.
8. I submit that the scheme is UNSUSTAINABLE as affordable housing and should be turned down now.

### **GW002 Mr King (Site Promoter)**

#### **Introduction**

This statement has been prepared in response to the note on Hearing of Petitions issued by the LPA dated 14<sup>th</sup> May. The site in question lies adjacent to Boarlands Estate in Port Eynon and is proposed for affordable housing by Coastal Housing Group. It has been identified for development in the LDP preferred Strategy (see attached diagram) following the earlier estimate of affordable housing need identified in the Strategic Options Report which stated in para 7.11 that a shortfall of affordable housing across the county is a significant issue. In this respect the Swansea Bay Housing Market Study 2013 identified the need for 7100 additional affordable houses to be built in the LDP period, i.e. 44% of the total housing requirement. Gower was identified as a rural area with special housing need.

This statement is in two parts – the first dealing with the planning merits of the site; and the second part dealing with affordable housing need and policy. The City & County of Swansea have identified the need for 250 affordable homes in Gower and an additional 350 units in the Gower fringe.

#### **The Site**

The advantages of the 3 acre site were clearly set out in the original submission as a candidate site, viz:

- (a) It is conveniently located on the edge of Port Eynon village, bounded by development on three sides, representing a natural rounding off of the village, as clearly shown on the map in the Gower Design Guide;
- (b) It is in a highly sustainable location, close to public transport and all facilities, with a direct footpath to the village;
- (c) Furthermore the site lends itself to the provision of affordable housing for this part of Gower.



## Issues

Two issues needed assessing: the question of access, and impact on the landscape of the AONB. Dealing with access, a consultation with the Highway Engineer confirmed that traffic uses the lane safely by pausing in passing bays as necessary, a situation prevalent in many parts of Gower. As such there was no objection. Concerning landscape impact, a photograph of the site taken from the bay demonstrates that while the site is visible, it is not overly obtrusive, being framed by the housing at the rear, Boarlands to the right, and camping and tents in the foreground in the summer.

In planning terms the site is favourably located in Port Eynon. To concentrate all development in Scurlage as the original strategy proposed would be wrong – the key village approach is an outmoded model of planning, which should, rather, encourage modest growth throughout the villages in the interests of encouraging a web of sustainable rural life. Physically the site has been inspected and it is regarded as suitable for housing development.

The proposal will incorporate a mix of bungalows that will be situated on the lower part of the site, thus lessening the visual impact, with traditional housing occupying the remainder of the site. It is anticipated that a balanced mix of two, three and four bedroom houses will be provided to meet local needs. The tenure of the accommodation will be subject to ongoing negotiation with the Local Authority.

## Oystermouth

### OY003: Land at Thistleboon Caravan Park

#### OY003 Mr Smith (petitioner)

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.

## OY016: Land at Higher Lane

### OY016 Mrs Burgess (petitioner)

Good morning Chairman and members of the Panel. My name is Jill 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.”**

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 beggars 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. Thank you.***

**OY016 Mr Geraint John (Site Promoter)**

Good morning Members, my name is Geraint John, planning consultant on behalf of the site promoter – Edenstone Homes.

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 Officers' 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.