

Report of the Cabinet Member for Commercial Opportunities & Innovation

Council - 27 July 2017

SWANSEA LOCAL DEVELOPMENT PLAN (LDP) – UPDATE ON DEPOSIT LDP PUBLIC CONSULTATION, EVIDENCE BASE REVIEW AND NEXT STAGES

Purpose: To confirm the findings of the Deposit LDP consultation and subsequent review of the evidence base that underpins the LDP Strategy, and to approve the next stages of the LDP process

Policy Framework: Planning and Compulsory Purchase Act 2004; The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004; Town and Country Planning (Local Development Plan) (Wales) Regulations 2005; Local Development Plans Wales Guidance (2005); Local Development Plan Manual (2006); Planning Policy Wales 2016 (as amended) and related Guidance; Well-being of Future Generations (Wales) Act 2015; Planning (Wales) Act 2015

Consultation: Legal, Finance, Access to Services

Recommendation(s):

It is recommended that Members:

- a) Note the content of Appendix C of this report and approve the Deposit LDP Consultation Report,
- b) Approve submission of the Swansea Deposit LDP, and accompanying documentation listed in Appendix D of this report, to the Welsh Government and Planning Inspectorate for independent examination,
- c) Approve delegated authority for the Head of Planning and City Regeneration (or appropriate delegated officer) to agree any necessary minor changes to the LDP during, and leading up to, independent examination, in order to facilitate the efficient operation of the examination process, and
- d) Approve the amended LDP Delivery Agreement and timetable set out in Appendix F of this report

Report Author: Tom Evans

Finance Officer: James Moore

Legal Officer: Jonathan Wills

Access to Services Officer: Sherill Hopkins

1.0 Background

- 1.1 All local planning authorities in Wales have a legal duty to produce a Local Development Plan (LDP) in accordance with the requirements and guidelines laid down by the Welsh Government. The Swansea LDP will replace the existing Unitary Development Plan and when adopted will become the primary planning framework to manage development across the County up to 2025. It will provide a basis for consistent and evidenced based decisions on planning applications, and represent the Council's blueprint for the future development and conservation of land.
- 1.2 The LDP provides a huge opportunity to take a co-ordinated, positive approach to managing inevitable future change across the County. This includes ensuring that future development accords with a clear 'placemaking' strategy that will drive up quality and deliver places and neighbourhoods that are founded on the key principles of the Well-being of Future Generations Act. In particular, the creation of places that are attractive, well connected, supportive of good health, culturally rich, benefit from good infrastructure, and capable of being potential exemplars of sustainable living. By promoting this placemaking approach across the spectrum of development, from small householder proposals at one end to the creation of comprehensively master-planned new neighbourhoods at the other, the LDP has the potential to enhance the quality of development across the County and deliver places that provide a proud legacy for future generations.
- 1.3 Planning for future growth commensurate with the aspirations of an ambitious City and County at the heart of a City Region inevitably involves difficult decisions regarding the future use of land. This includes releasing 'greenfield' land for development to allow for sustainable growth. Such proposals can be distressing for people within affected areas, who are understandably concerned about issues such as: loss of open space and biodiversity; impact on nearby infrastructure including roads; additional burden on community facilities; and the effects of development on the character of established areas. Balancing the inherent tensions between the desire to protect and conserve land and communities, whilst providing opportunities for growth and development is fundamental to the strategic planning process. Crucially, land for development must be provided at the most appropriate, viable locations as supported by the available evidence if Swansea is to truly realise its growth aspirations and meet its requirements for providing new homes and jobs.
- 1.4 The LDP Preferred Strategy was approved at Council on 12th August 2014, following a comprehensive public consultation process. This represented a key milestone in the LDP process, highlighting that the LDP should provide for an identified housing need of at least 15,600 dwellings and 14,000 new jobs over the plan period 2010-25. The Preferred Strategy confirmed a number of locations for strategic scale development that will create new neighbourhoods with significant numbers of new housing supported by necessary new infrastructure and complementary facilities such as schools, shops, and areas for leisure and recreation. The Preferred Strategy also confirmed that the LDP will need to provide for a range of smaller scale, in-settlement and edge of

settlement development opportunities, which will allow new homes and employment schemes to come forward.

- 1.5 Following approval of the LDP Preferred Strategy, Members subsequently approved at Council on 24th September 2015 the full list of housing and strategic sites for allocation in the Deposit LDP. This decision on sites to be allocated was made having regard to extensive public consultations carried out on 'Candidate Sites' in 2011 and on initial draft allocations proposed at 'Pre-Deposit' stage during 2014-2015. The Council decision also followed a comprehensive site review process undertaken with Planning Committee Members between June and August 2015, which considered all petitions and significant objections submitted by interested parties.
- 1.6 Following approval of the housing and strategic sites for allocation, a series of further Member workshops and stakeholder engagement events was undertaken in February and March 2016, specifically to review draft LDP policies and proposals. This process highlighted amendments necessary to the policies to ensure the Deposit LDP appropriately addressed all key issues.

2.0 Deposit LDP

- 2.1 Having regard to the outcomes of all consultations undertaken, stakeholder engagement exercises, Member sessions and the recommendations of Council, officers finalised the Swansea Deposit LDP (www.swansea.gov.uk/ldpdeposit), which was approved by Members for the purpose of public consultation on 16th June 2016. The Deposit LDP sets out the full range of planning policies and proposals that, in combination, comprise the LDP policy framework addressing the specific issues and challenges that face the City and County. The scope of these is extremely varied, which reflects the County's diverse urban and rural character. Policies are split into 'Key Strategic', 'Area-Wide' and 'Area Specific' as follows:
 - Key Strategic Policies relate to overarching themes of the Plan, including Sustainability; Housing Strategy; Placemaking; Masterplanning; Affordable Housing; Economic Growth; Regeneration; Infrastructure and Transport
 - Area-Wide Policies are of a generic or topic based nature (i.e. not place specific), and include policies that set out criteria against which planning applications will be considered.
 - Area-Specific Policies relate to site specific proposals, such as key areas of change or protection. These include locally specific policies for development, regeneration schemes and masterplan areas, as well as specific sites for protection and conservation.
- 2.2 The written policies of the Deposit LDP are supplemented by a Proposals Map, which comprises a series of maps that feature land use designations overlain on an Ordnance Survey base. These include the sites and development areas described in specific policies and proposals. It also defines the settlement boundaries of the main urban area and 'Key Villages' in rural areas, beyond which are the areas that are considered to be open countryside, where most

forms of development are not favoured. The Proposal Map designations include:

- Housing Sites (allocations and commitments)
- Strategic Development Areas
- District Centres and Retail Parks
- Mineral Safeguarding Areas
- Green Belt/Green Wedges
- Special Landscape Areas

2.3 The LDP is supported by a comprehensive evidence base and addresses the County's future needs for homes, jobs, infrastructure, leisure and community facilities, amongst other forms of development. All of these, are required to be delivered in combination, in order to support economic growth and provide opportunities for future generations. LDP policies that promote development are set alongside those that will ensure development respects and promotes the County's cultural heritage, important landscapes and sensitive environments.

2.4 The LDP places the delivery of new and improved infrastructure at the heart of its placemaking approach. It contains a number of policies - including site specific requirements - that require the proposed new homes and employment uses to also deliver key infrastructure measures in a timely fashion, such as new schools and parks, utility upgrades and transport measures. In respect of the latter, the Deposit LDP allocations have been made having regard to the findings of a County-wide Strategic Transport Assessment and traffic model produced by consultants Arup. This Assessment considered the in-combination impact of the LDP proposals and the sustainability of the Strategic Development Areas in travel terms. The work has delivered to the Council a bespoke 'macroscopic' transport model that enables testing of the impact of proposed development upon the strategic transport network. Such testing has identified mitigation measures such as new road links or junction improvements that are considered necessary to ensure future developments would not give rise to unacceptable impacts. The LDP thereby provides the opportunity to take forward a coherent approach to land use and transport planning to address the County's transport needs in the context of future growth as well as existing network constraints and issues.

2.5 Fundamentally, the Deposit LDP provides a framework to deliver the new infrastructure that the City and County will need to support its inevitable future growth, which includes using appropriate legal mechanisms to mandate the delivery of new roads, schools, drainage infrastructure, etc. at certain key phases of a development, for the benefit of existing as well as future residents.

3.0 LDP Public Consultation

3.1 The LDP has been subject to extensive public consultation and stakeholder engagement at various stages throughout its formation. Details of specific consultation exercises and processes followed since the LDP process began in 2010, up until the formal Deposit consultation stage, are set out in the **City and County of Swansea LDP Initial Consultation Report** (available at

www.swansea.gov.uk/ldpbackgroundpapers). A summary of the consultation and engagement exercises is provided in **Appendix A** to this report.

- 3.2 Following its approval at Council for public consultation on 16th June 2016, the Deposit LDP and all relevant supporting documents were subject to a comprehensive program of promotion, exhibitions and engagement sessions with the public and key stakeholders. Details of all consultation sessions undertaken for the formal Deposit stage are set out in the **City and County of Swansea Deposit LDP Consultation Report** (available at www.swansea.gov.uk/ldpsubmission). A summary of the engagement and consultation exercises is provided in **Appendix B** to this report.
- 3.3 In total, 2,505 representations were made to the Deposit LDP from 1,027 separate individuals, organisations, or other interested parties. The nature of the objections received can broadly be broken down as 27% on issues relating to proposed LDP Strategic Development Areas; 42% on the inclusion or omission of non-strategic housing sites (including 'exceptional' sites allocated at Gower and Gower Fringe locations) and 31% relating to various topic based policies.
- 3.4 A **summary of the main issues identified by consultees** in their submissions to the Deposit LDP, and the response of the Local Planning Authority (LPA) to the submissions, is provided in **Appendix C** to this report. Whilst Appendix C presents a large amount of information for review, it is only a summary and a fuller account of all representations received, and the responses of the LPA to these, is set out in the City and County of Swansea Deposit LDP Consultation Report (available at www.swansea.gov.uk/ldpsubmission). The key issues raised include those relating to:
- LDP Strategy and Scale of Growth
 - Placemaking and Masterplanning Approach
 - Strategic Development Areas
 - Housing Sites (non-strategic and 'rural exception' sites)
 - Financial Viability, Deliverability and Phasing
 - Affordable Housing
 - Infrastructure and Transportation
 - Gypsy and Traveller requirements
 - Economy, Employment and Retailing
 - Green Belt and Green Wedges
 - Protection of Built and Natural Environment
 - Welsh Language
- 3.5 The City and County of Swansea Deposit LDP Consultation Report includes reference to whether the LPA considers an amendment to the LDP evidence base or Deposit Plan is appropriate in the light of a representation made, and crucially whether this raises any fundamental issues as to the 'soundness' of the Plan for submission for examination. In considering the requirement for any substantive change to be made to the Deposit LDP in response to comments submitted, full regard has been given to the relevant Welsh Government and Planning Inspectorate guidance. In this respect, the guidance is clear that if a Local Authority has carried out the plan making process properly there should

be no need to substantively change the Deposit LDP. Furthermore, any such substantive changes (termed ‘focussed changes’ by Welsh Government guidance) should only be made if they are considered necessary to ensure that the LDP is sound and/or fit for submission, i.e. fulfilling the expectations of the legislation. Guidance clearly states that changes should be avoided, and if they really are necessary to ensure the plan is sound they must be kept to a minimum. Fundamentally, National Guidance states that Local Authorities should carefully consider whether substantive changes are a necessity to the Deposit and whether any such change warrants a revised version of the LDP being produced, advertised and subject to further public consultation in order for it to be submitted for examination.

- 3.6 Following careful consideration of the issues arising from the public consultation process, and having discussed the Deposit Plan evidence base with the Welsh Government, it is considered there are a number of amendments that can be made to the Plan to address comments made and improve its accuracy or clarity, but that there are no compelling or demonstrable reasons to propose very substantive changes to the Deposit LDP. This conclusion has been reached following a post-consultation further review of key areas of background evidence (as described in 4.0 below), which considered comments from some objectors suggesting inaccuracies or shortfalls in this evidence. The LPA has undertaken this review to respond to comments made and ensure a high level of certainty that the evidence base is the most up to date and detailed going forward to examination stage (as described in 4.0 below).
- 3.7 The Deposit LDP Consultation Report highlights the nature of improvements and corrections that can be made to the document (such as isolated mapping errors and policy clarifications) without fundamentally altering the nature of policies or proposals within the Plan. It is considered appropriate for the LPA to indicate its support for such changes to be presented to the appointed Inspector for his/her consideration on the basis that these are amendments that do not affect the soundness of the Plan.

4.0 Key Supporting Evidence

- 4.1 The Deposit LDP is underpinned by a large amount of technical studies, assessments and supporting evidence, amassed since the start of the Plan making process in 2010. This background information represents the wealth of material and evidence considered necessary to meet the relevant LDP tests of soundness, as required by Welsh Government regulations, and to support and clarify policies in the Plan. The information must be submitted alongside the LDP for independent examination. A list of so called ‘**Core Documents**’ to be submitted alongside the LDP is set out in **Appendix D** to this report. These documents are available to view by the public and all interested parties on the Council’s website.
- 4.2 The supporting evidence includes the work carried out to comply with the requirement under the Planning and Compulsory Purchase Act 2004 to subject the LDP to a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA). The integrated SA on the LDP has ensured the policies and proposals of the Plan reflect sustainable development principles and assess the effect of the plan on the economy, social wellbeing,

resource conservation and environmental protection/enhancement. The Sustainability Appraisal Reports of the Deposit Plan are one of the core documents set out in Appendix D of this report. The Council is also required by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the 'Habitats Regulations') to undertake a Habitats Regulations Assessment (HRA) of the LDP to determine the likely significant effects of the LDP on European Sites of nature conservation importance. A Habitats Regulations Assessment Report of the LDP was undertaken by consultants DTA Ecology Ltd, and is also a core document supporting the Plan. The overall conclusion of the HRA of the Deposit LDP is that, with the incorporation of suggested mitigation measures, the Deposit LDP will have no likely significant effect, either alone or in combination with other plans and projects, on any European Site. This conclusion is supported by NRW, subject to the clarification of a few matters mainly relating to the discharge of water and air pollution, as outlined in the Deposit LDP Consultation Report. It is not considered that such clarification affects the overall conclusion of the HRA. Given that no substantive changes are required to be made to the Deposit LDP, it is concluded that none of the changes would have a likely significant effect on any European Site. No further assessment under the Habitat Regulations is required and the overall conclusion of the original HRA remains unchanged.

- 4.3 Representations were made during the Deposit LDP consultation in respect of the Plan's overall strategy and scale of growth, citing matters such as the importance of the 'City Deal' to Swansea and the potential impact of changes in economic circumstances at national and international level over the Plan period. These comments highlighted perceived shortcomings to economic and population forecasts, which objectors have raised as possible reasons to either reduce or increase allocations, depending on the perspective of the objector. The House Builders Federation for example maintain that the Plan should allocate for a greater number of homes, whilst conversely individual members of the public have raised concerns that the growth is too high. It must be noted that the Welsh Government representations on the Deposit state that the LDP strategy is suitably bold and ambitious and capitalises on the role of Swansea within the City Region. The Welsh Government support the Council's positive approach to housing growth, and no objection is made by them to the job numbers or housing requirement in the plan. Notwithstanding this, the representations from interested parties on this issue provided an opportunity for the LPA to carry out a further review of the evidence prior to examination in order to 'sense check' against the latest data and analysis, and to provide sufficient confidence that the overall level of economic and housing growth allowed for in the Plan is appropriate.
- 4.4 Having regard to the above, the LPA commissioned an independent review and assessment of the projected level of economic and housing growth, and corresponding assessment of implications for LDP Strategy and allocations. The commission was carried out by a consortium led by consultancy Turley and considered the implications of: the updated details of the City Deal for the Swansea Bay City Region; any macro-economic changes that have arisen; and any other factors that may have a bearing on future growth. It also included an analysis of updated growth forecasts from recognised agencies and data sources, including from the Welsh Government. The key conclusion arising

from the Turley review was that the updated analysis reinforced the level of housing provision planning in the Deposit LDP, with an acknowledgement that an appropriate flexibility/buffer allowance should be provided for in excess of the base 'need' figure of 15,600 homes. The need for a flexibility allowance to be built into the Plan, is in line with national guidance, and whilst the buffer is greater than in some other Authorities, there are specific circumstances unique to Swansea's strategy that requires a slightly larger margin to allow for some degree of uncertainty about the precise start up dates and phasing schedules for complex, strategic sites (SDAs). This approach takes account of matters such as major opening up costs and unforeseen issues that could arise on some sites of this nature. It also takes account of the Council's commitment to supporting the delivery of significant numbers of affordable new homes. This is considered a sensible and pragmatic approach that respects the nature of the allocations, the Council's corporate aspirations, and that also 'future proofs' the Plan, enhancing its soundness. The Turley review also concluded that the updated evidence reinforces the scale of jobs planning for in the Deposit LDP, including the need for employment land that aligns with City Region scale growth aspirations and forecasts. The findings highlight that appropriate employment land can be provided for within the LDP's mixed-use strategic sites at Felindre, Fabian Way Corridor, Waunarlwydd and the City Centre. In summary, the findings of the commission provide further confirmation that the LDP strategy, and the scale of growth provided for in the Plan, is appropriate and in line with evidence.

- 4.5 A number of representations received during the Deposit consultation related to the importance of demonstrating the viability and deliverability of sites allocated for development. In particular, the Welsh Government highlighted that key sites are dependent on infrastructure improvements that need to be costed as far as reasonably possible, such as transport measures and new schools. Representations advised that the Council will need to consider the impact on the timing of sites and demonstrate that sites are genuinely available and deliverable. The representations from all interested parties on this issue provided an opportunity for the LPA to carry out a further review of the evidence prior to examination in order to 'sense check' against the latest data and analysis and provide sufficient confidence that that the sites, in particular the proposed Strategic Development Areas, are indeed viable and deliverable.
- 4.6 Having regard to the above, the LPA commissioned a comprehensive update on the independent financial viability appraisals (IFVAs) for each private sector promoted residential led Strategic Development Area. The purpose of the commission was to further assess detailed costed infrastructure that is required by the Deposit LDP policies to come forward in association with development, and confirm the community benefits and levels of affordable housing that is viable at each site. Following the review, all large scale residential sites within private ownership have now been subject to up to date IFVAs, and all infrastructure associated with proposed development has been costed as far as is reasonably possible in advance of detailed planning application stages. In summary, the findings of the commission provide further confirmation that the LDP strategy, and the specific strategic sites allocated, stands up to scrutiny in terms of demonstrating viability and deliverability and is in line with evidence.

5.0 Future LDP Stages and Timeline

- 5.1 Given that the LDP Deposit consultation, and subsequent review of background evidence, has confirmed that no substantive changes to the LDP are required, approval is now sought from Members to submit the Deposit LDP and all relevant supporting documentation to the Planning Inspectorate for examination.
- 5.2 The LPA will write to all individuals and organisations that have submitted responses to the Deposit LDP to notify them of how the Council has responded to the representations they have made, and to provide information regarding next stages of the process. Following submission of the LDP for examination, the LPA will need to await confirmation from the Inspectorate that the submission is in order. Subject to this confirmation, notification will then be given of the inspector(s) appointed to examine the Plan. At this time it is expected that the Council will be given initial details of the examination program and the date of the first meeting of the examination process. It is likely that the inspector will call an 'Examination Pre-Hearing Meeting' and may request that certain additional material is provided by relevant parties and publicised by the Council in advance of the initial Meeting, which is a normal part of the process undertaken to assist the smooth running of the examination and aid clarity for all interested parties. Subject to the date of submission of the Plan, it is anticipated that the examination meetings and hearings will start during the third or fourth quarter of 2017.
- 5.3 The purpose of the examination is to provide an opportunity for all interested parties to have their duly made representations, including their proposed changes and general concerns to be independently considered by an experienced Planning Inspector. The inspector will also consider any 'Statements of Common Ground' that may be agreed between both sides in the lead up to the examination. After considering all of the evidence, including written representations and appearances at the hearings, the Inspector will subsequently prepare a binding report that will be sent to the Council to advise the changes that must be made to the LDP before it is adopted. In accordance with this timeframe it is anticipated that a report will be presented to Members in Summer 2018 in order to seek approval of the final version of the LDP, which will incorporate the Inspectors required changes, for the purpose of formal Plan adoption. Further details of the examination processes and future stages are set out in the **Service Level Agreement** produced by the Planning Inspectorate (attached as **Appendix E** of this report). An **amended LDP Delivery Agreement** timetable will be submitted to the Welsh Ministers for their approval, which provides a factual update to the submission date of the Plan and indicative dates for future stages (as set out in **Appendix F** of this report).
- 5.4 A Programme Officer has already been appointed to manage the day-to-day administration required for the examination process, including pre-commencement preparation. She is appointed by the LPA, but operates at 'arms-length' to maintain impartiality as an aid to the Planning Inspector. The Programme Officer will contact objectors to the LDP after its submission for examination to advise them of the likely date of the first formal meeting and of the mechanics of the process that will follow.

5.5 In the interest of an efficient and appropriately focussed examination process, and to try and address the concerns of some objectors wherever possible, following submission of the LDP for examination the Council will discuss further with certain objectors those aspects of their representation that can be agreed in the lead up to the formal hearing sessions. This will include producing 'Statements of Common Ground'. This is a normal part of the LDP process, which allows the Council to present to the Inspector proposed amendments that it would support as not fundamentally undermining the Plan. This process will ensure areas of disagreement to be debated at Hearing Sessions are narrowed to their absolute essentials, and will help find areas of compromise for the benefit of the appointed Inspector as well as the Council and objector. It is necessary for the Head of Service, or appropriately delegated officer, to have authority to agree any necessary minor changes to the LDP during, and leading up to, independent examination, in accordance with Welsh Government guidance and in order to facilitate the efficient operation of the examination process.

6.0 Equality and Engagement Implications

6.1 A full Equality Impact Assessment has been drafted and will continue to be updated as the LDP process progresses. The Assessment is available as a background paper to this report. The EIA highlights issues such as access for all in terms of design, specific elements in terms of age, disability, race and Welsh language alongside consultation activities undertaken. It is important to note that consultation responses have been received from a wide range of groups and organisations including equality groups.

7.0 Financial Implications

7.1 No budget has been set aside for any additional expenditure on any further evidence or assessments subsequently identified to support the LDP, or costs associated with any significant delay to the revised LDP Delivery Agreement timetable set out in Appendix F of this report. If any additional work is required, the budget for this will need to be identified first, prior to any work commencing.

7.2 Monitoring is being undertaken to assess the resources required in 2017-2018 financial year for the LDP Examination. These resources include costs incurred by the Planning Inspector(s), to be appointed in due course, whom in accordance with normal practice will charge the Council on behalf of the Welsh Ministers for undertaking the Examination. The Planning Inspectorate will also charge the Council for duties carried out by other Inspectorate officers in relation to the examination, where this is necessary to support the work of the Inspector and ensure the process moves forward in a timely fashion. A £100K carry forward from 2016-2017 has been approved, and will be held in an earmarked reserve for use in 2017-2018.

8.0 Legal Implications

8.1 The Council is statutorily obliged to prepare an LDP. The LPA's statutory duties in this regard are set out in Part 6 of the Planning and Compulsory

Purchase Act 2004, which requires that an LDP is made subject to independent examination to determine whether it is 'sound'. LDP's must be sound in terms of their content and the process by which they are produced.

- 8.2 The Council's UDP was 'time expired' on the 31st December 2016, however it remains the extant plan for decision making on planning proposals until the LDP is adopted. Given this, until LDP adoption, there is a risk of developers submitting planning applications on unallocated sites within the County, which the Council may find difficult to resist at any subsequent planning appeal, particular having regard to the current shortfall in housing land supply that will be given significant weight in decision making. Once the LDP is adopted by the Council it will formally replace the current UDP and become the extant planning policy framework to manage development across the County and the primary document to inform decision making.
- 8.3 The Welsh Government have wide-ranging powers under Part 6 of the Planning and Compulsory Purchase Act 2004 in respect of the preparation and submission of LDP's. If the Council is seen to unacceptably delay submitting the draft LDP to the Planning Inspectorate, there is a risk that the Welsh Government could use its default powers under s.71 of the Planning and Compulsory Purchase Act 2004 to prepare or revise the LDP and could further recharge the Council for undertaking this work.

Background Papers:

Report to Council 12 August 2014 - Swansea Local Development Plan (LDP)
Preferred Strategy and candidate site update
Report to Council 24 September 2015 - Swansea Local Development Plan (LDP)
Proposed Housing and Strategic Site Allocations
Report to Council 16 June 2016 - Swansea Local Development Plan (LDP)
Deposit for Public Consultation
Draft Equalities Equality Impact Assessment (EqIA) of Swansea Local Development Plan (LDP) Report, June 2016

Appendices:

Appendix A: Summary of Engagement and Consultation Exercises undertaken at 'Pre-Deposit' Stages of LDP
Appendix B: Summary of Engagement and Consultation Exercises undertaken for formal 'Deposit' Stage of LDP
Appendix C: Summary of key issues arising from the Deposit LDP consultation
Appendix D: List of supporting documentation to be submitted for examination
Appendix E: Service Level Agreement between The Planning Inspectorate and the City and County of Swansea
Appendix F: Revised LDP Delivery Agreement Timetable

Appendix A: Summary of Engagement and Consultation Exercises undertaken at 'Pre-Deposit Stages of LDP

LDP CANDIDATE SITES CONSULTATION:

Between **27th September 2010 and 31st May 2011** the Council formally invited the submission of sites from developers, land owners and the public for consideration by the Planning Authority for potential inclusion within the LDP. In total 557 sites were submitted for consideration through this process.

The Candidate Sites consultation carried out at this stage raised considerable public awareness of the Sites submitted by interested parties for consideration. The consultation process included a wide range of methods to gain responses. These included:

- Fully bilingual display in the main reception area of the Civic Centre accompanied by rolling digital display on screens;
- Multiple site notices placed on or around every Candidate Site submitted;
- Posters and feedback forms made available at all Council libraries;
- Press releases and numerous articles in local media;
- E-mail notifications and guidance sent to all consultees on e-consultation service,
- Notification to County Councillors and Community Councils.
- **3 community sessions** held at access throughout the County at:

Date	Time	Venue
17/01/2011	5-7pm	Gowerton Rechabite Hall
19/01/2011	5-7pm	Bishopston Sports Centre
24/01/2011	5-7pm	St Thomas Community School

LDP VISION, OBJECTIVES & STRATEGIC OPTIONS CONSULTATION:

Between **23rd July 2012 and 12th October 2012** an extensive consultation and engagement exercise was carried out to gain feedback on the high level strategic approach proposed for the LDP.

This consultation stage used a wide range of means to capture responses, including:

- Fully bilingual display in the main reception area of the Civic Centre accompanied by rolling digital display on screens;
- Posters and feedback forms made available at all Council libraries;
- E-mail notifications and guidance sent to all consultees on e-consultation service, Councillors and Community Councils.
- **8 community sessions** held at venues throughout the County at:

Date	Time	Venue
10/09/2012	4-7pm	South Penlan Community Centre
11/09/2012	4-7pm	Hope Chapel, St Teilo Street
13/09/2012	4-7pm	Three Crosses Community Centre
17/09/2012	4-7pm	Phoenix Centre, Powys Avenue

18/09/2012	4-7pm	St Hilarys Church, Killay
26/09/2102	4-7pm	Morrison Leisure Centre
27/09/2012	4-7pm	West Cross Community Centre

LDP PREFERRED STRATEGY CONSULTATION:

Between 12th August 2013 and 31st October 2013 an extensive consultation and engagement exercise was carried out on the LDP Preferred Strategy, which included details of the largest proposed areas of development.

The consultation on the Preferred Strategy also invited comments on the supporting documents including Strategic Technical Assessments, Topic Papers and other background evidence that underpins the LDP.

A wide range of consultation methods were utilised, inclusive of:

- Statutory consultee and stakeholder forum;
- Fully bilingual display in the main reception area of the Civic Centre accompanied by rolling digital display on screens;
- Press releases and numerous articles in local media;
- Posters and feedback forms made available at all Council libraries;
- E-mail notifications and guidance sent to all consultees on e-consultation service, Councillors and Community Councils.
- **9 community sessions** held at venues throughout the County at:

Date	Time	Venue
01/10/2013	1-4pm	Llansamlet Community Centre
02/10/2013	4-7pm	Llangyfelach Church Hall
03/10/2013	4-7pm	Wanarlwydd Community Centre
04/10/2013	11am-3pm	Quadrant Shopping Centre
08/10/2013	1-4pm	Brynmill Community Centre
09/10/2013	4-7pm	Penllergaer Primary School
10/10/2013	4-7pm	Penclawdd Community Centre
11/10/2013	4-7pm	Sketty Park Community Centre

DRAFT LDP PROPOSALS MAP CONSULTATION (Non Statutory 'Pre-deposit' stage to notify public of initial thoughts on allocations)

Between 4th December 2015 and 16th January 2016 a consultation was held to give the public, developers and any other interested parties an indication of the Planning Authority's initial draft of proposed LDP allocations, which were based on the assessments undertaken at that stage.

The consultation at this 'pre-deposit' stage utilised a number of methods including:

- Statutory consultee and stakeholder forum;
- New Candidates Sites and any sites with amended boundaries publicised by means of site notices

- Fully bilingual display in the main reception area of the Civic Centre accompanied by rolling digital display on screens;
- Press releases and numerous articles in local media;
- Posters and feedback forms made available at all Council libraries;
- E-mail notifications and guidance sent to all consultees on e-consultation service, Councillors and Community Councils.

MEMBER ENGAGEMENT ON LDP PROPOSED ALLOCATIONS

At Council on **31st March 2015** Members resolved that valid petitions to Candidate Sites would be heard by Planning Committee before deciding which sites should be included within the Deposit Plan.

A series of Special Planning Committee meetings open to the public were held on the following dates:

- **1 June 2015**
- **4 June 2015**
- **8 June 2015**
- **11 June 2015**
- **6 July 2015**
- **14 July 2015**

A further meeting was held on **11th August 2015**, which included consideration of sites not submitted during the Candidates Sites stage.

At a meeting of **Full Council on 24th September 2015**, the Planning Committee's recommendations were endorsed and the list of housing and strategic sites was agreed for inclusion in the Deposit Plan.

MEMBER AND STAKEHOLDER ENGAGEMENT ON LDP POLICIES AND PROPOSALS

During **February and March 2016**, a series of co-ordinated and facilitated workshops and engagement events were held with Members and other key stakeholders, both internal and external to the Council.

A series of six, two hour Member engagement sessions provided an opportunity for Councillors to consider early drafts of LDP policies and to ensure that the draft Plan suitably addressed all relevant key issues. The workshops involved presentations from Strategic Planning Officers on various subject areas, followed by question and answer sessions that brought in Officers representing specific policy areas, such as transport and education. These also included facilitated group work and proved valuable as a means of identifying gaps, omissions and further areas of work for officers to do prior to the Deposit being presented formally to Members for approval for consultation later in 2016.

Stakeholder engagement exercises centred around LDP key issues that had previously been identified during consultation and collation of the evidence base. Round table discussions and group exercises with agencies and organisations such

as Natural Resources Wales and Dwr Cymru/Welsh Water provided an opportunity to refine the detail of policy to avoid issues being raised at formal consultation stage that could have otherwise have been agreed and resolved beforehand.

Appendix B: Summary of Engagement and Consultation Exercises undertaken for the formal Deposit Stage of LDP

Following Member approval of the Deposit LDP for public consultation on 16th June 2016, the LDP written statement, Proposals Map and all relevant supporting documents were subject to a comprehensive program of promotion, exhibitions and engagement sessions with the public and key stakeholders. The public consultation on the Deposit LDP formally ran from 18th July – 31st August 2016 and utilised a wide range of consultation methods, inclusive of:

- Permanent display in the Civic Centre main reception area, accompanied by rolling digital display on screens;
- Press releases and numerous articles in local media;
- Site notices placed at proposed allocated sites to raise awareness and publicise the consultation;
- Posters and feedback forms made available at all Council libraries;
- Website updates and notification e-mails posted at intervals during consultation period to publicise the consultation to all those on the LDP database, as well as Ward Members and Community Councils;
- Engagement Forums with Statutory Consultees and Members;
- 16 community exhibitions and engagement sessions held at the following venues throughout the County, where numerous officers were on hand to discuss issues raised. The sessions typically lasted 3 hours each and were held variously during morning, afternoon and evening hours. In total the sessions constituted around 50 combined hours of events within communities.

Date	Time	Venue
29/06/2016	9am-3pm	Quadrant Shopping Centre
01/07/2016	4-7pm	Felindre Village Hall
04/07/2016	4-7pm	Penllergaer Primary School
05/07/2016	10am-1pm	Pontarddulais Institute
06/07/2016	10am-1pm	Newton Village Hall
07/07/2016	4-7pm	YGG Pontybrenin
08/07/2016	2-5pm	Montana Park Community Centre
11/07/2016	2-5pm	Pennard Parish Hall
12/07/2016	4-7pm	Swansea Vale Resource Centre
14/07/2016	1-4pm	Port Tennant Community Centre
15/07/2016	2-5pm	Clase Community Centre
19/07/2016	3-6pm	Pontlliw Village Hall
20/07/2016	4-7pm	Llangyfelach Church Hall
21/07/2016	4-7pm	Gowerton Rechabite Hall
23/08/2016	5-7pm	Civic Centre Reception
24/08/2016	5-7pm	Civic Centre Reception

Appendix C: Key issues arising from Deposit LDP consultation and summary of responses

A total of **2,505 representations** were duly made during the Deposit LDP Consultation. The nature of the objections can broadly be broken down as follows, which illustrates that most comments relate to individual sites:

Topic Based Policies	31%
Strategic Development Areas (SDAs)	27%
Non-strategic Housing Sites	19%
Rural Exception Sites	23%

The following provides a summary of key issues that emerged from the Deposit LDP consultation and a summary of the Council responses, grouped under the following headings:

1. **LDP STRATEGY AND SCALE OF GROWTH**
2. **MASTERPLANNING AND PLACEMAKING**
3. **STRATEGIC DEVELOPMENT AREAS**
4. **HOUSING SITES (NON-STRATEGIC AND 'RURAL EXCEPTION' SITES)**
5. **ALTERNATIVE SITES AND BOUNDARY CHANGES**
6. **FINANCIAL VIABILITY, DELIVERABILITY AND PHASING**
7. **AFFORDABLE HOUSING**
8. **INFRASTRUCTURE AND TRANSPORTATION**
9. **GYPSY AND TRAVELLER REQUIREMENTS**
10. **ECONOMY AND EMPLOYMENT**
11. **RETAILING**
12. **GREEN BELT AND GREEN WEDGES**
13. **PROTECTION OF BUILT AND NATURAL ENVIRONMENT**
14. **WELSH LANGUAGE**
15. **LDP CONSULTATION PROCESS**

1. LDP STRATEGY AND SCALE OF GROWTH

SUPPORT

- Welsh Government (WG) is supportive of the approach taken in the Plan, which it considers will ensure a range and choice of sites across the County. It considers the strategy to be bold and ambitious, capitalising on the role of Swansea within the City Region. On balance the WG supports the Council's positive approach to housing growth and does not object to the housing requirement in the plan
- Growth strategy supported by Neath Port Talbot (NPT) Council, citing its alignment with evidence produced on a cross boundary basis
- Natural Resources Wales (NRW) welcome the Strategy and recognise the work undertaken to achieve the vision of creating sustainable communities
- Support for the overall strategy also received from The Gower Society, University of Wales Trinity Saint David (UWTSD), National Grid

OBJECTION ISSUES

Most common themes raised by objectors on these issues included:

- Requests for additional smaller (non-strategic) housing sites to be allocated in the Plan, stating over-reliance upon Strategic Development Areas
- Replace greenfield allocations with more brownfield site allocations
- Negative impact of the scale of future development on existing infrastructure, including transport and drainage, and community facilities/provision such as primary health care and education facilities – in particular perceived lack of existing capacity to assimilate growth

- Potential impact of 2016 EU referendum result on future population growth forecasts and corresponding requirement for new homes and jobs
- Over optimistic and unrealistic projections of future growth of economy and numbers of jobs
- Request for clarification and/or re-appraisal of land supply calculations due to perceived problems with assumptions and methodology used and the high figure for flexibility allowance for housing provision
- Some objectors, primarily housebuilders and landowners, have challenged the growth strategy by means of their promoted alternative sites for allocation, as a means of justifying their perceived need for additional sites to be included in the Plan
- Some objections to individual site allocations (i.e. requested site deletions) are formulated on a challenge to the need for the total number of homes required, citing perceived shortcomings in analysis/assessments of growth forecasting
- Cumulative impact of all allocations on local character and cultural identity, including in relation to Welsh language

COUNCIL RESPONSE

- It is recognised that planning for future growth commensurate with the aspirations of an ambitious City and County at the heart of a City Region inevitably involves difficult decisions, including releasing greenfield land for development. It is also understood that this can be distressing for people within affected areas, who are understandably concerned about potential adverse impact on their communities. However balancing the inherent tensions between the desire to protect and conserve land and existing settlements, whilst providing opportunities for growth and development is fundamental to the strategic

- planning process. The Plan is fundamentally anchored on the principle of providing development land at the most appropriate, viable and sustainable locations as supported by the available evidence to ensure Swansea can realise its growth aspirations and meet its requirements for providing new homes and jobs. The allocations and policies in the Plan are those considered most capable of creating places that are attractive, well connected, supportive of good health, culturally rich, benefit from good infrastructure, and capable of being potential exemplars of sustainable living. This is consistent with the goals of the Well-being of Future Generations (Wales) Act. The Plan needs to be read as a whole and contains the necessary safeguards and policy requirements to prevent adverse impact being caused to existing communities, infrastructure and facilities
- No further allocations are considered necessary to meet the evidenced need for future growth as the Council has concluded that, subject to refinements and necessary corrections, the allocations in the Deposit LDP are the most appropriate to deliver on the LDP Vision, Objectives and Growth Strategy. The Council supports specific refinements and clarifications to certain sites (see sections below), which it considers can be made without undermining the soundness of the Plan.
 - A comprehensive previously developed land assessment has been carried out to identify the appropriate scale of development that can be accommodated on brownfield sites. In effect these opportunities have been maximised in the Plan, but there remains a clear requirement to allocate greenfield land. The LDP allocations at greenfield sites allow for the controlled and sustainable expansion of the urban area, and have followed a detailed review of settlement boundaries and landscape character. The potential for coalescence between existing communities

has been at the forefront of this review. The allocations and proposed Green Wedges/Green Belt in the LDP are considered the most appropriate means of safeguarding the separate identities of communities and providing an appropriate setting to the proposed urban edge.

- The Council appointed Turley, in partnership with AMION and Edge Analytics, to produce a comprehensive assessment and update of the evidence base relating to the projected level of economic and housing growth that underpins the LDP and a corresponding assessment of implications for LDP Strategy and allocations, having regard to representations made. This review includes the implications of: the updated details of the proposed City Deal for the Swansea Bay City Region; any macro-economic changes that have arisen (or that can be accurately forecast to arise); and any other factors that may have a bearing on future growth (including possible implications arising from the EU referendum result).
- The flexibility allowance in the Plan needs to be larger than a more typical 10-15% threshold to allow for unforeseen complications/delays that could arise on individual Strategic Development Areas given the greater potential for such risk on certain sites and to allow for variation in the phasing trajectory. This position is supported by the Conclusions of the Turley Review.
- The LDP Strategy is considered to be the most appropriate and viable means of delivering new and enhanced infrastructure and services to cater for a City and County that will continue to grow. The Strategy of a balanced distribution between large strategic allocations, together with a proportion of smaller scale sites was selected as the most sustainable and robust approach that would deliver the Plan's Vision and Objectives. LDP policy requires necessary contributions to be secured through individual agreements on future applications, but significantly

requires specific facilities and infrastructure, such as schools and roads, to be delivered as part of Strategic Development Areas

- The evidence base relating to economic growth and population forecasts is considered robust and sufficiently up to date at the time of the Deposit, and is in alignment with evidence produced on a cross boundary basis that has been 'ratified' through independent examination. Furthermore, the evidence base has been updated through the Turley review, the conclusions of which support the level of growth set out in the Deposit Plan.
- Having regard to all representations submitted, no compelling evidence has been submitted at the Deposit stage to demonstrate that the LDP strategy is inherently unsound.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

Section 1.1 – Introduction

- An amendment to para 1.1.4 to refer to differing stages of neighbouring authority's adopted LDP's to provide an informative and administrative update.
- An amendment to include a new bullet para 1.1.21 is considered an informative update to re-inforce the commitment to planning for the growth of Swansea's universities in a sustainable manner.

Section 1.3 Growth Strategy

- In order to clearly reflect the further detailed analysis presented in the Turley Review Report, updates and amendments of the growth strategy paragraphs in Section 1.3 and the figures set out in Policy PS3 are considered to have merit. In particular amendments are required to

- Revise the presentation of the figures that illustrate;
 - the components of supply
 - The overall housing requirement (to clearly exclude the windfall allowance)
 - The overall housing supply
- Provide clarification of what the Council's flexibility allowance is and its reasons for this

- A minor amendment to provide additional text in 1.3.23 to confirm how the Council will approach the phasing and delivery of the housing requirement. To provide useful clarification of impact of the plan strategy on delivery, particularly re effect of reliance on SD sites on the ability to deliver the housing requirement in the short term and to provide reference to the conclusions of the Independent Financial Viability Appraisals.

- An amendment to paragraph 1.3.47 to clarify the source of evidence which supports the level of housing need in the Gower/Gower Fringe.

- Amendments to section 1.4 to include an overarching statement on the matter of addressing Primary Health care capacity. .

- A minor amendment to para 1.4.9 to clarify that the Memorandum of Understanding relating to relating to the impact of development draining into the CBEEMs in the Loughor estuary is in the process of being revised to set out the agreed approach to ensure there is sufficient capacity to allow for the delivery of the Plan .

2. MASTERPLANNING AND PLACEMAKING

SUPPORT

- WG are supportive of the positive approach to planning and the ethos of good urban design, master planning and placemaking which is embedded strongly within the Plan. WG are further supportive of the approach of securing comprehensive development to deliver the infrastructure requirements for key development sites
- Carmarthenshire County Council welcome the ongoing commitment in relation to the provisions of the Burry Inlet Memorandum of Understanding as it applies to all development
- DCWW generally support the policy, particularly with regard to the criterion requiring off site surface water compensatory removal
- Rivington Land (appointed by the Council to manage City Centre regeneration proposals) support the priority given to St. David's/Quadrant regeneration project, as pivotal to the strategy for Swansea Central Area and for the County and City Region as a whole, given its potential to stimulate significant activity and jobs in its preparation, delivery and operation. Rivington Land has committed to help Council achieve this and considers there is much to support in terms of Plan's overall aims, objectives and priorities
- Morris Estate Trustees support the commitment to sustainable urban development and sound place making principles. Support principles in policy which are consistent with proposed Design Code for their promoted site to deliver site vision, and acknowledgement of impact of viability issues on ability to provide affordable housing

OBJECTION ISSUES

- Concern that policy is overlong and that all masterplanning principles cannot be met on all sites especially in circumstances where parts of strategic sites will come forward in advance of the wider site and where specific sites additionally are allocated for community and other facilities. The use of the term 'must' and the use of the term 'required' is unnecessarily and inappropriately restrictive. Any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text would be contrary to policy, and thereby incompatible. Greater flexibility/less absolute requirement required to reflect continual evolving nature of proposals, particularly regarding emerging viability evidence
- DCWW request clarification that developer contributions may be sought as required, where infrastructure improvements are sought in advance of DCWW investment programme
- Insufficient regard for people with sight loss, particularly regarding proposed use of shared surface schemes which create a lack of distinction between road and pavement with consequent negative impact on confidence and resilience of partially sighted people
- NRW suggest greater flexibility in numbers and density of units on SDA sites may be needed in order for development to meet the policies environmental requirements. Phases of Strategic Developments must be integrated and reflect the masterplan if green infrastructure and landscape features are to function properly and provide the required benefits. Integrated management across SDA's is required, to an agreed Plan
- The threshold of 100 units should be reconsidered/raised in this policy as it is likely to delay the delivery of homes at

the start of the plan. Clarify the likely trigger for requiring design codes and sub area master plans

COUNCIL RESPONSE

- The LDP takes a positive approach to managing the inevitable future increases in the areas population and related pressures on services and infrastructure. This approach is explicitly focussed on ensuring the nature of future development across the County accords with a clear 'placemaking' strategy that will drive up quality and deliver places and neighbourhoods that are founded on the key principles of the Well-being of Future Generations Act. The length of the policy is acknowledged as not typical of the rest of the Plan, however each of its principals and criteria are considered necessary for the effective management of good design and placemaking across a range of development types.
- The use of the terms 'required' and 'must provide' are necessary to make clear that the Council intends that development comes forward in accordance with the principles stipulated in the LDP. This does not prevent the Council demonstrating flexibility on certain detailed elements of proposals as they come forward for planning applications
- Phasing of development and precise densities will need to be agreed having regard to viability appraisals, and the need for flexibility in this regard is built into the overall allowance for housing figures in the Plan.
- The Council would support clarification text to explain the circumstances when developer contributions will be sought to deliver water and drainage infrastructure (see response to representations set out in Infrastructure and Transportation section later in this report). Such

amendments can be made without affecting the soundness of the Plan.

- The Policy as drafted emphasises the Council's commitment to ensuring that developments "provide an accessible environment for all". This includes people with sight loss. The Policy seeks to provide sufficient flexibility for the careful consideration of the balance of place and movement requirements in order to provide the quality of design and place making appropriate to a specific scheme. Guide Dogs Cymru would be provided with opportunity to comment on the design of schemes to ensure that they meet the needs of people with sight loss.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amendments Policy PS2 to include direct references to healthy and accessible environments. Amendments will maintain consistency with the Plan's health and wellbeing objectives and improve cross references to the Future Generations Act.
- Amendments to supporting text to Policy PS2 to highlight the importance of design and build quality in creating sustainable developments over the long term.

3. STRATEGIC DEVELOPMENT

POLICY SD 1: STRATEGIC DEVELOPMENT AREAS (OVERARCHING POLICY)

The following provides a summary of recurring themes/issues/comments that relate to the principle of allocating all 12 Strategic Development Areas. Site specific issues relating to each site are dealt with in later sections to follow.

SUPPORT

- In the majority of cases, site promoters and landowners have submitted representations in support of the allocations. These representations are usually supported by detailed written statements, vision documents, masterplans and supporting technical surveys and assessments. Some of these reflect ongoing discussions with landowners and site promoters on the progression of the strategic sites
- The commitment to small scale commercial provision within the heart of new neighbourhoods is supported by Sainsbury's supermarkets
- The Wildlife Trust is supportive of the approach taken to balance the provision of development areas with the need to safeguard and protect environment

OBJECTION ISSUES

(includes items commonly raised across all SDA sites as well as submissions on Policy SD1)

- **Highways and Transport:** Local congestion and wider cumulative impact across transport network. Reliability and robustness of Strategic Transport Study

- **Flood risk and Drainage:** Concerns regarding development being affected by flooding and lack of capacity of drainage infrastructure
- **Health Care:** Lack of capacity of local Primary Health Care Facilities, as raised by the local health board (ABMHU), local GP Practices and public
- **Schools:** Lack of capacity of existing schools and lack of provision for welsh medium or secondary education within SD sites
- **Cultural impact:** Particular concerns raised regarding adverse impact on welsh language
- **Non-residential and commercial/community hub uses:** Clarification sought on whether 'local centres' proposed in SDA Concept Plan constitute a 'retail allocation'. NPT highlight the need to avoid adverse impact on existing centres
- **Viability and delivery:** Suggested insufficient evidence in the plan that cost of development requirements, and constraints to delivery, have been adequately assessed and taken into account re delivery and phasing
- **Phasing:** Concerns regarding the timing of development and the delivery of improvements to infrastructure and facilities. HBF request policy amended to clarify details of site capacity, delivery and phasing of housing and associated infrastructure
- **Environmental impact:** Concerns about the loss of habitat and wildlife on sites and requests for further detail in the SDA policies about proposals for mitigation
- **Loss of Agricultural Land:** particularly high grade land
- **Noise and Air pollution:** including during construction
- **Loss of privacy and views:** primarily caused by principle of building on Greenfields

SUGGESTED CHANGES TO THE PLAN INCLUDED

- **Site deletion:** The majority of objections to SD sites request that the allocations be deleted
- **Alternative Strategic Development Area** submitted at land south of A48, Llangyfelach- *see alternative site section below for further detail*
- **Site amendment:** Some representations requested that the scale of the sites be reduced, other facilities be incorporated to accompany residential or that phasing be introduced to ensure that essential infrastructure is delivered
- **Minor text amendments and revisions:** to provide clarification on details of placemaking principles and development requirements

COUNCIL RESPONSES

- Given the scale of required future growth in jobs, homes and overall population there will inevitably be greater levels of traffic across the County in future years. This will lead to increased congestion across the network, which could give rise to unacceptable impact unless appropriate mitigating transport measures and new infrastructure are delivered. The LDP thereby represents an opportunity to set out a coherent approach to land use and transport planning which addresses the County's transport needs in the context of future growth as well as existing network constraints and issues. A Strategic Transport Model Study undertaken for the Council by consultants examined these issues, identified the cumulative impacts of the LDP allocations and set out a Transport Measures Priority Schedule to address the impacts. LDP Policy will require Planning Obligations to be used where necessary to make developments sustainable and deliver enhancements as

- required, having regard to individual Transport Assessments and the results of Strategic Model testing. LDP policy makes clear that development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted. This overall approach, and the robust evidence base provided by the Strategic Transport Study, is considered a sound foundation for the allocations made in the Plan
- The Plan will avoid unnecessary flood risk by requiring detailed assessments of the flood implications of development proposals within areas susceptible to tidal or fluvial flooding and preventing development in the first instance that unacceptably increases risk. Development will only be considered in areas at high risk of flooding where information is provided to demonstrate that a proposal satisfies the Flood Consequence Assessment tests set out in TAN 15: Development and Flood Risk. Allocations involving flood zones C1 & C2 have only been made where a SFCA demonstrates that the proposed development satisfies the tests set out in TAN15
 - The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), which will ensure allocations can be implemented without damage to the water quality and thus comply with the no deterioration in water bodies requirement of the WFD, and protection of the environment from adverse effects of urban waste water discharges as required by the Urban Waste Water Treatment Directive
 - The Council recognises the existing strain felt by many primary and community healthcare providers and that future populations will need to have access to appropriate health facilities. The LDP presents an opportunity to assist

the process of planning strategically for the future healthcare needs of the County. LDP policy will require proposals to demonstrate that either existing provision has the capacity or that, where there is deficiency; arrangements will be put in place to help provide new or improved health facilities, or other appropriate measures. Where necessary, new facilities will be brought forward within individual sites and/or planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable, which will include addressing any identified deficiencies in provision or capacity

- The Council acknowledge that a key issue for the plan is to ensure that sufficient additional school places are provided to meet the demand generated as a result of the significant number of new dwellings to be delivered over the Plan period. The Council has a statutory duty to ensure that a sufficient number and variety of school places at primary and secondary level are available to meet the needs of the population of the County. Education officers and planning officers have therefore worked collaboratively to ensure the LDP supports the provision of sufficient additional school places as part of the LDP process. Specific school requirements are set out in LDP Policy, which takes a tailored and flexible approach to the provision of education facilities in association with new development. This will ensure development will not give rise to adverse impact on existing education facilities and that new facilities will be provided where required
- The LDP recognises that it is important that developments do not negatively impact on the linguistic balance of an area, and instead form sustainable developments which integrate into the social and cultural fabric of the community. The Plan identifies a Welsh Language Sensitive Area (WLSA) which covers more of the County

than that designated by the UDP. The Plan sets out that, within this WLSA, residential development for 10 or more dwellings and retail, commercial or industrial development of 1000 sq. m or more floor space, will now be required to submit a Welsh Language Action Plan (WLAP) setting out the measures to be taken to protect, promote and enhance the Welsh Language. Planning permission will be subject to conditions or legal agreement requiring the implementation of the recommendations of the WLAP

- The provision of new infrastructure, as well as the safeguarding, improvement and efficient use of existing infrastructure is considered central to ensuring that all new development proposed within the Plan period contributes to achieving the vision of creating sustainable communities
- The allocations and proposals in the Plan are founded on an analysis of their viability and developability, a key principle of which is that the costs relating to any measures required to make the development viable and sustainable are taken into account at an early stage of the development process (including land acquisition). Strategic Development Areas have been subject to Independent Financial Viability Appraisals that consider site specific constraints and developer requirements
- Comprehensive updates to the IFVAs have been done for each residential led Strategic Development Area in response to representations made. This includes updates to detailed costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and confirmation of the community benefits and levels of affordable housing that is viable at each site. Such an update to IFVAs has enabled all infrastructure associated with development to be costed as far as is reasonably possible in advance of detailed planning application stages. This update work has confirmed the viability and developability of the allocated SDAs

- The Best and Most Versatile (BMV) Agricultural Land (Grade 3a and above) is one of many considerations taken into account when assessing sites within the County in line with national guidance set out in Planning Policy Wales. Throughout the LDP Spatial Options Appraisal process, and assessment of candidate sites for allocation, the priority has been to deliver development needs on lower grade land and such sites have been identified wherever possible. However where there is an overriding need for development to fulfil the LDP Strategy and there is no other suitable alternative location in which housing or employment allocations can be situated this has resulted in some allocations, or parts thereof, being situated on BMV land
- The LDP policy framework will ensure that the Council would not grant planning permission for any development that would cause significant risk to air quality or health by virtue of emissions from the development itself or works generated by it. Policies make clear that where development could lead to exposure to a source of noise pollution it must be demonstrated that appropriate mitigation measures will be implemented
- LDP Policies relating to Placemaking and Design will ensure all development will enhance the quality of places and spaces, and respond positively to aspects of local context and character that contribute towards a sense of place. Potential impacts of specific proposals on people's amenity will be assessed at planning application stage and will consider elements such as visual impact, loss of light, overlooking, privacy, disturbance and likely traffic movements. Planning legislation and policy cannot seek to enshrine individuals right to a particular view, however LDP policies relating to design and placemaking will ensure that development by virtue of its scale, siting and layout will not cause material harm to outlook or privacy

- The SDA Concept Plans strike an appropriate balance between providing areas for development opportunities, whilst conserving existing, and providing new open space and areas of biodiversity protection
- The retail/commercial areas identified on SDA Concept Plans represent small scale facilities commensurate with that which would complement a new neighbourhood, such as small convenience store, café's and other facilities on a scale that would pose no threat to existing District or Town Centres in Swansea or adjoining administrative areas
- The proposed alternative Strategic Development Area (at land south of A48 at Llangyfelach) is not considered a preferable site to the SDAs allocated in the Plan (see Alternative Sites section below) and is not required as an additional allocation to ensure the Plan is sound

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amendment to Policy SD 2 to provide further clarity on how the calculation of density in the Plan relates to the methodology set out in the Council's [Residential Design Guide](#).
- Amendment to clarify Development Requirements set out in Strategic Development Area Policies SD A to SD L to include text requested by DCWW to refer to "*on and off site measures including any appropriate upgrades to the clean water supply or public sewerage networks*".
- A number of minor amendments are proposed to the individual Strategic Development Area Policies and their supporting text and concept plans. These are non-substantive amendments, for example to correct typographical error, provide factual updates to the Policies or refine having regard to updated viability appraisals, and do not affect the viability or soundness of the allocations.

POLICY SD A - LAND AT PONTARDDULAIS

SUPPORT

- Supported by site promotor (Persimmon Homes) and land owner of part of site (The Davies Family)

SITE SPECIFIC OBJECTION ISSUES

- Local highway congestion and concerns regarding wider cumulative impact across network, particularly on Hendy, Grovesend and Pontlliw. Carmarthenshire County Council, and Llanedi Community Council specifically raise the need for consideration of cross boundary impact of development on Hendy and wider Carmarthenshire area
- DCWW object to site's relationship to the 66inch highly pressurised main pipe. NRW highlight that some areas of the allocation are partially within the C2 flood zone. Local residents highlight local surface water flooding, particularly in Glynhir Road and Glanfrwdd Road. Issues of exacerbation of existing issues with low water pressure
- Insufficient capacity at local surgeries raised by ABMHU and local surgeries, Talybont and Ty'r Y Felin. Talybont Surgery identify low staffing and recruitment levels and a lack of record storage space as key concerns
- The scale of development proposed for Pontarddulais is an issue highlighted by the Town Council, the local ward member as well as the wider public. The number of dwellings proposed on SD A is considered to be too great, particularly when taken in combination with existing permissions, non-strategic (H 1) sites and developments over the Carmarthenshire County Council boundary (Hendy)
- A number of respondents raised concerns about the cultural impact of large scale of population increase on a

strong Welsh language speaking community and the lack of proposals for increasing Welsh medium education

- Concern that the level of new homes could not be matched by local employment and would thus generate a need for further commuting out of the area. Specific issues were raised by the landowner in relation to the improvement of the existing employment estate, who request that the text and policy are revised to clarify that enhancements will not apply to the whole of the employment site. Local businesses on the industrial estate raise the issue that the existing employment has inadequate road links for the HGV's that access the site. The low number of staff employed on the existing employment sites also provides limited local employment opportunities
- Representations were also received from local business in the centre of Pontarddulais concerned that the creation of a spine street through the site would divert traffic away from the centre and further reduce footfall past their business, which has already reduced as a result of the new Tesco store
- Concern that the allocation joins 'economically advantageous' greenfield development with brownfield land and thereby favours developer margin over community interest and planning principles

COUNCIL RESPONSE

- The combined impact of this SDA with all other allocations upon the County's transport network has been robustly assessed in the Council commissioned Strategic Transport Assessment (STA), and the necessary mitigating transport measures identified as part of this work. This includes a number of 'off site' improvements to highway infrastructure. It is recognised that M4 Junction 48 is within the Carmarthenshire Authority boundary and at the 'edge' of the transport model and thus testing using the strategic model is less clear as the route choices are constrained. However the STA does highlight that an enhancement of J48 may be necessary to mitigate the impact of individual developments subject to further detailed testing. Similarly, for all LDP allocations, the traffic impact upon the more local network will need to be gauged through Transport Assessments at the planning application stage. It is recognised that this will need to take into account and appropriately mitigate the cross boundary impacts of the development on the wider Carmarthenshire area
- The design of the SD A has taken into account the presence of the 66 inch high pressure water main, with the area kept free of development as indicated on the Concept Plan and appropriate mitigation measures will need to be incorporated at the planning application stage. Areas within the flood zone are not allocated for development and the SDA will incorporate measures to mitigate existing and potential future surface water run-off and issues relating to low pressure. Technical specialists within DCWW and Persimmon Homes are continuing a dialogue to consider the appropriateness of particular engineering solutions and designs that will inform the precise scale and nature of development land at this location
- The Council is committed to working in partnership with the Local Health Board and site promoters to explore opportunities for strategic sites to address Primary Health Care capacity issues and future needs across the County, either by means of contributions to enhance existing facilities or the provision of new premises/land at appropriate sites. This detail will emerge following detailed evidence of need and requirement for each area, which individual applications can respond to
- The scale of development proposed provides an opportunity to deliver a new spine street to facilitate the redirection of HGV traffic movements away from residential streets and the comprehensive school. The number of units proposed, reflects that a significant portion of the site would be high-density brownfield redevelopment. The brownfield part of the site lies within the existing settlement boundary and could be brought forward at any stage under current local and national policy. The brownfield site alone is not capable of delivering the wider community benefits and new infrastructure set out in the SD A Policy
- Fundamentally, the extent of the greenfield development area will depend on a number of factors, such as the mitigation measures and engineering details associated with the high pressure mains, further detailed testing of transport impact across Authority boundaries, and the Authority's intentions relating to the delivery of a 3 form entry Primary School. Depending on the outcome of these deliberations a refinement of the scale and extent of the development may be supported by the Council having regard to the updated evidence, however such a refinement would not undermine the soundness of the Plan
- The LDP identifies Pontarddulais as a Welsh Language Sensitive Area and, as identified in the common issues section above, any application would need to be accompanied by a Welsh Language Action Plan setting out

measures to protect, promote and enhance the Welsh Language

- The allocation seeks to provide replacement units for any units lost at Pontarddulais Industrial Estate, to facilitate the construction of a new access spine street and to implement a range of environmental enhancement measures which, in association with improved road links for HGVs, seek to retain and attract local businesses. Furthermore, the spine street would improve the sustainability of the Lye Industrial Estate to the north with a view to its long-term retention as an employment centre. The spine street would divert HGV traffic away from the centre of Pontarddulais which would likely increase rather than reduce footfall. The future occupants of the SDA are not contributing to current footfall and, notwithstanding the spine street, will inevitably increase footfall within the centre
- Each SDA is subject of an independent financial viability assessment that has considered the developer margin and community interests and the principles of good planning practice. The development scheme as currently proposed would deliver a new spine street, improve the accessibility to and viability of local employment centres, provide a new 3 form entry Primary School, create a multi-functional green infrastructure network, including a new linear park and safe routes to school, plus off-site improvements such as surface water control measures. None of this would be provided based on brownfield development alone.
- Comprehensive updates to the IFVAs have been done for each residential led Strategic Development Area in response to representations made. This includes updates to detailed costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and confirmation of the community benefits and levels of affordable housing that is viable at each site. Such an update to IFVAs has enabled all infrastructure

associated with development to be costed as far as is reasonably possible in advance of detailed planning application stages. This update work has confirmed the viability and developability of the allocated SDAs

POLICY SD B: LAND AT GARDEN VILLAGE

SUPPORT

- Supported by site promotor (Persimmon Homes)

SITE SPECIFIC OBJECTION ISSUES

- Increased congestion on surrounding roads and junctions, including Swansea Road, with corresponding safety issues such as that caused by residents reversing out of properties
- Cumulative traffic impact of proposals, considering all other strategic development sites across ward boundaries, is considered unacceptable
- Objection to principle of secondary access onto Swansea Road to be formed by widening of the lane, which is considered unnecessary
- Lack of clarity on the provision of bus service through the site and proposed access for school drop-off
- Proposed cycleway should be provided regardless of whether development goes ahead
- Impact of development on Ancient Woodland and concerns regarding designation of Ancient Woodland as natural green space. Creation of ready access and new footpaths and cycle tracks through the site would cause a direct loss of the woodland contrary to National Policy. NRW request amendment of Concept Plan to alter land use adjacent to Ancient Woodland to include appropriate landscaping,

buffers and use of green infrastructure to assist in resolving issues and create links with adjoining habitats

- Presence of protected species at the site
- Loss of the green space/green park adjacent to Clos Bryngwyn despite assurances that land would be protected
- Impact on Primary Health Care which are already at capacity. Specific comments from Ty'r Felin Surgery which is struggling to cope with the existing local population
- Phasing of delivery of school and impact on existing schools in the interim
- Impact on Sewage Treatment Works capacity;
- Impacts on Bury Inlet/Loughor Estuary
- Impact on Welsh Language Sensitive Area
- Erosion of garden village principles.

COUNCIL RESPONSE

- The combined transport impact of this SDA with all other allocations has been robustly assessed in the Council commissioned Strategic Transport Assessment (STA), and the necessary mitigating transport measures identified. The modelling and assessment work undertaken is considered to be high quality, accurate and based on an extensive data set. The Council has confidence in the outputs of the work undertaken and the conclusions and recommendations are sound. The proposed means of access to/from the site have also been assessed by the Council transportation department that considers the measures appropriate in principle. The proposed access onto Swansea Road will serve only a limited part of the development, including the school drop off, however it is considered an important secondary outlet for the scheme to ensure connectivity and appropriate distribution of traffic. All transport impacts of the SDA will be subject to further

detailed Transport Assessment at the planning application stage. This will test the requirements set out in the Transport Measures Priority Schedule for targeted enhancements to the surrounding network including the nearby existing roundabouts (see also Council response to representations on Transportation and Infrastructure below)

- Further detail on the internal road layouts within the site that would facilitate a through bus route will be required as part of any detailed TA and planning application
- The proposed enhancements to cycling routes is a key part of the proposals to deliver a sustainable development and will be required as an essential part of the development
- It is not the intention to allow ready access to the ancient woodland area or to create linkages through it, other than the main access which it is acknowledged will require the removal of part of the woodland. The ancient woodland and surrounding open space area is within the development boundary but is proposed for appropriate protection and buffers to ensure that the integrity of the site is not compromised by the proximity of the development. The Council would support clarifying text to emphasise this. The loss of ancient Woodland will only be considered acceptable providing there is adequate compensation. The compensation should be an area of new native woodland of a composition similar to that on the site already. It should be an area significantly greater than that which would go (including the other woodland lost to the access road). The new woodland should be planted in an area of low ecological value and should be continuous with the existing wood
- The Council recognises that there is some evidence of Dormice at the site. Whilst, this is not a reason to prevent any development at the site the Council will require a comprehensive mitigation strategy for dormice, setting out

the impacts of the scheme and how these will be mitigated or compensated for, including areas to be retained, replaced, enhanced for dormice (as appropriate); measures to minimise the impact of any development on dormice and; proposals to maintain connectivity within and to the wider landscape including the proposed road crossing.

- The SDA emphasises that the principle of retaining/enhancing the area bordering the existing Garden Village estate as open space is a fundamental part of the masterplan for the site. The site is the subject of a planning application and the developer has been advised that the proposed strip of development adjoining Clos Bryngwyn should be kept free of development. As such the Council is supportive of an amendment to the Concept Plan to reflect this, which will ensure the area referred to as 'The Park' is maximised. Such an amendment can be made without affecting the soundness of the Plan
- Education and planning departments have worked collaboratively to support the provision of sufficient additional schools as part of the LDP process. Policy SD C requires that the site delivers a 2.5 form entry Primary School with playing pitches. The Education department have assessed this provision as appropriate to accommodate growth over the LDP period. The school would be delivered during early phases of the scheme to serve new and existing residents
- The Council is committed to working in partnership with the Local Health Board and site promoters to explore the opportunities for strategic sites to address the Primary Health Care capacity issues and future needs across the County, either by means of contributions to enhance existing facilities or the provision of new premises/land at appropriate sites. This detail will emerge following detailed

evidence of need and requirements for each area, which individual applications can respond to.

- The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), (see Council response to representations on Infrastructure and Transportation below)
- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on the site or elsewhere from any sources including surface water
- The LDP includes policies that will ensure development delivers on and off-site measures to mitigate the impact of development on the drainage system, including any appropriate upgrades to the clean water supply or public sewerage networks
- The concept planning approach in the LDP is considered the most appropriate means of securing enhancements to services, facilities and infrastructure within the area, whilst delivering a new neighbourhood that is attractive, well connected, supportive of good health, benefit from good infrastructure and facilities for future generations as well as existing. This is consistent with the goals of the Well-being of Future Generations (Wales) Act. The Plan needs to be read as a whole and contains the necessary safeguards and policy requirements to prevent adverse impact being caused to the existing community, or overload its infrastructure and facilities. The concept plan is specifically embracing of Garden Village principles and detailed scheme designs will be required to ensure these principles are delivered

POLICY SD C – LAND AT PENLLERGAER

SUPPORT

- Supported by site promotor (Bellway Homes)

SITE SPECIFIC OBJECTION ISSUES

- Unacceptable impact from traffic and highway congestion would arise locally, and on wider network, giving rise to safety concerns – including additional pressure on links and junctions at Gorseinon Road, A484, A483 and J47
- Traffic congestion and infrastructure problems will not be alleviated by a relief road through the proposed development
- The Strategic Transport Study is flawed and contains errors
- Insufficient capacity amongst local primary and secondary schools to accommodate future population, and proposed new school is insufficient
- Future school provision should be for Welsh-medium school, which is lacking in the area
- Lack of any new primary healthcare facility identified for the site, which is considered necessary given no current primary care provision in the area and over capacity of existing practices most likely to be affected - in terms of workforce and facilities – that would be unable to cater for further population growth
- Failure to comply with national policy guidelines for managing urban forms by means of green belts and green wedges, and lack of appropriate analysis/explanation for these protection designations made
- Development would create a sprawling urban area and dilute the identity of Penllergaer
- Development area has long been designated a green wedge, including in the UDP, and the Council has previously rejected proposals for development on the site
- Unacceptable loss of high quality agricultural land
- Complete change of character of the village, adversely affecting community ethos and spirit
- A new community hub is not needed for Penllergaer given the existing facilities
- Loss of ancient woodland
- Adverse impact on landscape and protected areas including Loughor Estuary & Mynydd Garngoch Common
- Impact on Welsh Language within Welsh Language Sensitive Area
- Drainage infrastructure and waste treatment facilities , including Gowerton Water Treatment Works, lack capacity to accommodate the proposed development
- Unacceptable pollution, including air and noise, from a decade long building project
- Impact on local services already under pressure
- Exacerbate existing problems of poor drainage at Gorseinon Road common
- Impact on biodiversity and environmentally important area – including various habitats and species
- Sites such as land north of M4 Junction 46 near Felindre are more appropriate for development
- Alternative uses for the site should be considered such as a Solar Panel Farm

COUNCIL RESPONSE

- The combined transport impact of this SDA with all other allocations has been robustly assessed in the Council

commissioned Strategic Transport Assessment and the necessary mitigating transport measures identified. The modelling and assessment work undertaken is considered to be high quality, accurate and based on an extensive data set. The Council has confidence in the outputs of the work undertaken. Any errors identified in the final report are considered minor and do not undermine the soundness of the conclusions and recommendations, including the proposed spine street, which will deliver wider strategic benefit. All transport impacts of the SDA will be subject to further detailed Transport Assessment at the planning application stage. This will test the requirements set out in the Transport Measures Priority Schedule for targeted enhancements to the surrounding network (see also Council response to reps on Transportation and Infrastructure below)

- Education and planning departments have worked collaboratively to support the provision of sufficient additional schools as part of the LDP process. Policy SD C requires that the site delivers a 3 form entry Primary School with playing pitches. The Education department have assessed this provision as appropriate to accommodate growth over the LDP period. The school would be delivered during early phases of the scheme to serve new and existing residents. The concept plan shows that this will be located within the proposed community hub/local centre to ensure that it becomes part of the 'heart' of the new place
- The LDP does not stipulate the medium of future school provision, which would be subject to a separate process of consultation and appraisal by the Education Authority
- The Council is committed to working in partnership with the Local Health Board and site promoters to explore the opportunities for strategic sites to address the Primary Health Care capacity issues and future needs across the

County, either by means of contributions to enhance existing facilities or the provision of new premises/land at appropriate sites. This detail will emerge following detailed evidence of need and requirements for each area, which individual applications can respond to. The site promoter is supportive of the notion of delivering a new facility within the site as part of the proposed community hub

- The Plan preparation process has involved a review of Green Wedge boundaries to allow for necessary development, which has been carried out in line with National Planning Guidance (PPW paragraph 4.8.1). Furthermore as required by National Planning Guidance (PPW 4.8.12) the Green Wedge designations have been reviewed to only include land that is strictly necessary to fulfil the purposes of the policy that is to prevent coalescence. The process is set out in the Swansea LDP Assessment for Green Belt and Wedge Designations 2016.
- The LDP emphasises that the proposed Green Belt will strategically manage the urban form for the long term at this location where several strategic development areas are proposed. It will maintain these new settlements as self-sufficient and sustainable and keep them as discrete and distinct settlements. This will be achieved by maintaining the openness of the existing countryside between the new settlements for the long term
- The Plan making process requires a review of all current and previously designated green wedge areas to reconsider whether amendments to the settlement boundaries can be made to facilitate development whilst still preserving openness and area of separation between settlements
- The Best and Most Versatile (BMV) Agricultural Land is one of many considerations which has been considered when assessing the sites in line with national Planning

Policy (see response to representations on Policy SD 1 above)

- Each Strategic Development Area is subject to an Independent Financial Viability Appraisal that has considered the implications of the infrastructure and affordable housing requirements on an individual site basis
- Comprehensive updates to the IFVAs will be done for each residential led Strategic Development Area prior to examination. This will include updates to detailed costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and confirmation of the community benefits and levels of affordable housing that is viable at each site. Such an update to IFVAs will enable all infrastructure associated with development to be costed as far as is reasonably possible in advance of detailed planning application stages.
- The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), (see Council response to representations on Infrastructure and Transportation below)
- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on the site or elsewhere from any sources including surface water
- The Concept Plan for site SD C makes clear that large portions of the site will be maintained as public open spaces and green infrastructure. This will create a connected multi-functional Green Infrastructure network including an extensive linear park, with retained trees and hedgerows. This will be subject to further detailed

appraisal as part of the ongoing masterplanning, including consideration of existing high value biodiversity areas such as Ancient Woodland. It will require appropriate buffers and an approach which considers any adjoining semi-natural broadleaved woodland

- The LDP includes policies that will ensure development delivers on and off-site measures to mitigate the impact of development on the drainage system, including any appropriate upgrades to the clean water supply or public sewerage networks. The area of Common at Gorseinon Road does have drainage issues that can be addressed by mitigation and enhancement measures required as part of the planning application process
- The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), which will ensure allocations can be implemented without damage to the water quality and thus comply with the no deterioration in water bodies requirement of the WFD, and protection of the environment from adverse effects of urban waste water discharges as required by the Urban Waste Water Treatment Directive
- The Council acknowledges that the proposed SDA would significantly increase the size of the settlement and population at Penllergaer. However, the concept planning approach in the LDP is considered the most appropriate means of securing enhancements to services, facilities and infrastructure within the area, whilst delivering a new neighbourhood that is attractive, well connected, supportive of good health, benefit from good infrastructure and facilities for future generations as well as existing. This is consistent with the goals of the Well-being of Future Generations (Wales) Act. The Plan needs to be read as a

whole and contains the necessary safeguards and policy requirements to prevent adverse impact being caused to the existing community ethos, or overload its infrastructure and facilities

- The LDP already allocates a substantial development area at land north of M4 J46, however it is not considered appropriate or viable to extend this allocation further for the Plan period

POLICY SD D – LAND AT LLANGYFELACH/PENDERRY

SUPPORT

- Supported by site promotor (Llanmoor Homes), and Llangyfelach Community Council.

SITE SPECIFIC OBJECTION ISSUES

- The proposed spine street might be used as a rat-run
- Impact on highway congestion in local area and wider network, notwithstanding proposed new highway measures
- If a highway link between the spine street and A48 is required from SDA D it will have viability implications
- Impact on Loughor Estuary water quality
- The development could cause surface water flooding
- Urban coalescence and loss of countryside
- House prices will be driven down
- Loss of agricultural land
- Concern regarding biodiversity impact
- Assembly Member objects to the size of the development proposed and not the principle of the site

COUNCIL RESPONSE

- The Plan sets out that development proposals must not encourage extraneous traffic unless there is a specific strategic need for an access route through an area. They must also minimise vehicle speeds where appropriate. It is envisaged that the proposed spine street will have a design speed of 30mph, with areas of 20mph along public realm areas/walking routes to school etc. It has been identified by the Strategic Transport Model Study that a new internal spine street will, in addition to providing access to the site itself, alleviate congestion within the area in combination with other infrastructure improvements
- The combined impact of this SDA with all other allocations has been robustly assessed in the Council commissioned Strategic Transport Assessment and the necessary mitigating transport measures identified. All transport impacts of the SDA will be subject to further detailed Transport Assessment at the planning application stage. This will test the requirement set out in the Transport Measures Priority Schedule for a strategic link from the site to the A48 (see Council response to reps on Transportation and Infrastructure below)
- Each Strategic Development Area is subject to an Independent Financial Viability Appraisal that has considered the implications of the infrastructure and affordable housing requirements on an individual site basis.
- Comprehensive updates to the IFVAs have been done for each residential led Strategic Development Area in response to representations made. This includes updates to detailed costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and confirmation of the community benefits and levels of affordable housing that is viable at each site. Such an update to IFVAs has enabled all infrastructure associated with development to be costed as far as is

reasonably possible in advance of detailed planning application stages. This update work has confirmed the viability and developability of the allocated SDAs

- The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), (see Council response to reps on Infrastructure and Transportation below)
- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on the site or elsewhere from any sources including surface water
- There is not sufficient viable brownfield land within the County to provide for sufficient growth in new homes and employment opportunities, which necessitates the Plan to release greenfield sites based on detailed assessments of settlement boundaries (see response to LDP Strategy and Scale of Growth above)
- The Concept Plan for the site makes clear that large portions of the site will be maintained as public open spaces and green infrastructure. This will create a connected multi-functional Green Infrastructure network through a series of east-west linear parks, retaining trees and hedgerows. Balance ponds will receive supplementary native local provenance planting. There will be a buffer along the western and northern site edge bordering the off-site SSSI
- Notwithstanding that perceptions regarding possible future devaluation of property prices is not a material planning consideration, there is no evidence that this would materialise
- The Best and Most Versatile (BMV) Agricultural Land is one of many considerations which have been considered

when assessing the sites in line with national Planning Policy (see response to reps on Policy SD 1 above). SD D has been assessed to have a low probability of BMV

- 100% priority habitat sites were filtered out of the site selection process. For all other SDAs an extended phase1 habitat survey has informed the masterplanning. Important features highlighted may require further survey at planning application stage, but do not preclude allocation.

POLICY SD E – CLASEMONT ROAD

SUPPORT

- The Site is supported by the landowner (The Trustees of the Morris Estate) who consider that the policy reflects their vision for the site
- Llangyfelach Community Council has no objections in principle, subject to provision of satisfactory infrastructure and amenities
- The Wildlife Trust support the treatment of green space and BAP habitats in the concept plan

SITE SPECIFIC OBJECTION ISSUES

- The scale/number of dwellings proposed on the size of site constitutes overdevelopment
- DCWW have no issues regarding water supply or sewage treatment works capacity but highlight that the site is traversed by number of water mains, including 26” trunk main for which protection measures are required in form of easement or diversion
- The Local Health Board request that a new Primary Healthcare facility be provided on either this site or on SD G (Felindre) and SD D (West of Llangyfelach Road) to serve all developments

- Objection to mixed use along road frontage
- Effect of site on existing highways congestion due to proximity to Hospital, DVLA and Cemetery
- Cumulative volume of traffic and proliferation of parking generated by all proposals in the area, and particularly regarding DVLA and hospital traffic
- Lack of capacity in local schools
- Impact on local surface water drainage and lack of capacity at Sewage Water Treatment Works
- Increase in noise and air pollution
- Loss of UDP green wedge leading to coalescence of Morriston and Llangyfelach
- Impact on biodiversity, including loss of hedgerows
- Lack of need for housing growth in the area, considered to have reached saturation point
- Assembly Member objects to the size of the development proposed and not the principle of the site

COUNCIL RESPONSE

- The SDA policy emphasises that a higher density development has been identified as potentially appropriate only where the number of units is explicitly linked to the design principles, which the Council is seeking to deliver on the Site. The vision for the site, shared by the Council and the Morris Estate, is the creation of a modern day legacy project, which will be a higher density, walkable place with significant areas of open space. The capacity of the site of up to 600 dwellings is based on a placemaking and architectural approach endorsed by the Design Commission for Wales. If these principles are not met the total number of homes will be reduced as set out in the policy
- The concept plan shows the location of the “community hub” mixed uses along the road frontage in order to maximise the integration of the new development with existing community and ensure that the community hub is located where existing residents and local employees are also able to make use of the business and services created
- The Council is aware of the presence of water mains on the site and the design and this has been taken into account in the layout of green corridors and areas to be kept free from development, as shown on the Concept Plan
- The Council is committed to working in partnership with the Local Health Board and site promoters to explore the opportunities for strategic sites to address the Primary Health Care capacity issues and future needs across the County, either by means of contributions to enhance existing facilities or the provision of new premises/land at appropriate sites. This detail will emerge following detailed evidence of need and requirements for each area, which individual applications can respond to
- Education and planning departments have worked collaboratively to support the provision of sufficient additional schools as part of the LDP process. Policy SD E requires that the site deliver a 2-form entry Primary School with playing pitches. This should be delivered during early phases of the scheme to serve new and existing residents. The Concept Plan shows that this will be located close to the proposed local centre to ensure that it becomes the ‘heart’ of the new place
- The combined impact of this SDA with all other allocations has been robustly assessed in the Council commissioned Strategic Transport Assessment and the necessary mitigating transport measures identified. All transport impacts of the SDA will be subject to further detailed Transport Assessment at the planning application stage.

This will test the requirement set out in the Transport Measures Priority Schedule, for targeted improvements (see Council response to representations on Transportation and Infrastructure below). This includes the proposal to provide a new road link to connect J46 spur roundabout to Pantlassau Road and improvements to M4 J46 interchange and local junctions

- DCWW have been consulted on all strategic site allocations and have confirmed that the site drains to Swansea STW where there are no issues of capacity
- The allocation allows for the controlled and sustainable expansion of the urban area, and follows a detailed review of settlement boundaries and landscape character, including the potential for coalescence (see response to reps on Policy SD 1 above)
- The Plan preparation process has involved a review of Green Wedge boundaries to allow for necessary development in line with National Planning Guidance (PPW paragraph 4.8.1). Furthermore as required by National Planning Guidance (PPW 4.8.12) the Green Wedge designations have been reviewed to include only land that is strictly necessary to fulfil the purposes of the policy, which is to prevent coalescence. At Pantlassau, the countryside to the north extends into open countryside and is not at risk of coalescence; therefore, it has been judged that a Green Wedge is no longer appropriate. The process is set out in the Swansea LDP Assessment for Green Belt and Wedge Designations 2016
- The Local Housing Market needs assessment identified a need for growth in the North Strategic Housing Policy Zone (SHPZ). Furthermore, the Plan's growth strategy is based on evidence of the need to create additional employment over the plan period. The site is well located to serve this evidenced housing need, with regard being given to

existing employment at the DVLA and Morriston Hospital which are major local employers

POLICY SD F CEFN COED HOSPITAL, COCKETT

SUPPORT

- The Site is supported by the landowner (Abertawe Bro Morgannwg University Health Board) and Swansea Civic Society

SITE SPECIFIC OBJECTION ISSUES

- Traffic congestion concerns raised regarding Cockett Road, and potential increased traffic on Stepney Road
- An adjacent landowner objects to the omission of their land (at Llwyn Mawr Road) from the SDA and suggests this is required to facilitate the highway access
- The development could worsen surface water flooding down Stepney Road
- The land owner and representing agent object to the SD site boundary including land between the hospital campus and Llwyn Mawr Road which is not under their control
- Policy be amended to require the Council to amend the reference to the legal agreement
- The Policy should require a local centre/retail uses on site in-line with the other SDAs to ensure sustainable development
- The land was sold by Dillwyn Llewellyn to be used in connection with children and developing the land for housing does not conform
- The policy only refers to retaining and converting "selected" buildings. The red brick buildings are of significant historic

and landmark character and must be retained in addition to the water tower

- House prices will be driven down

COUNCIL RESPONSE

- A Strategic Transport Model Study examined the cumulative impacts of the LDP allocations and set out a Transport Measures Priority Schedule to address the impacts. All SDAs will be expected to produce a comprehensive TA and Travel Plan to develop a strategy to manage traffic demand and transportation impacts caused by the proposal. Timely contributions to infrastructure/measures will be sought, having regard to the Transport Measures Priority Schedule plus any other improvements identified as required by the TA.
- Sufficient land is allocated in the SDA to facilitate the partial connection to Llwyn Mawr Road
- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on site or elsewhere from any sources including surface water
- It is acknowledged that the site is under different land ownership but it is logical to plan strategically across the SDA due to their inherent links, not least in terms of their inter-reliance for accessibility/permeability. The site should therefore be included within the SDA and the site promoters should work together in further masterplanning the site
- Given the scale and character of the site it is not considered appropriate for it to incorporate a community/commercial hub of scale commensurate with other SDAs
- The Council is aware of a legal agreement relating to the land on the ridgeline to the north of the hospital.

Negotiations will need to be undertaken between the relevant parties to resolve the legal agreement through the appropriate legal process, with the ultimate aim of ensuring land is protected for the purpose of leisure and recreation at this broad location to serve the community

- The Policy reflects that none of the buildings are listed and further assessment is required to ascertain the merit and viability of their retention/re-use. It is recognised that some are historical assets of special local interest and widely visible as landmarks on the skyline, particularly the Water Tower which is specified for retention and conversion
- Notwithstanding that perceptions regarding possible future devaluation of property prices is not in itself a material planning consideration, there is no evidence that this would materialise

POLICY SD G NORTHWEST OF M4 J46, LLANGYFELACH

SUPPORT

- The allocation of the site is supported by the land owner (Welsh Government) and in principle by Llangyfelach Community Council

SITE SPECIFIC OBJECTION ISSUES

- Concerns regarding potential access from the A48 through Bryntywod – potential conflict with HGVs, and a need to upgrade the bridge
- Concern regarding impact on Loughor Estuary and River Llan water quality
- Loss of countryside and biodiversity
- The village centre should be termed a “Local Centre” as the modest size of the village is likely to dictate that commercial units will be limited in number and the

community element should be incorporated as part of the proposed Primary School

- Retention of the bridleway LC/84/3 as part of the bus route may not be practical
- It is not felt that the delivery of this new settlement will achieve sufficient environmental, social or economic advantages to conform to National Planning Policy
- Concern that site viability and deliverability will be compromised by the infrastructure and other requirements required from developers to make the developments sustainable

COUNCIL RESPONSE

- A spine street is proposed linking the SDA to the A48 through Bryntwyod. It has been identified by the Strategic Transport Model Study that this will, in addition to providing access to the site itself, alleviate congestion within the area in combination with other infrastructure improvements
- The combined impact of this SDA with all other allocations has been robustly assessed in the Council commissioned Strategic Transport Assessment and the necessary mitigating transport measures identified. All transport impacts of the SDA will be subject to further detailed Transport Assessment at the planning application stage. This will test the requirement set out in the Transport Measures Priority Schedule for a strategic link from the site to the A48 (see Council response to representations on Transportation and Infrastructure below)
- The water quality of the Burry Inlet and Loughor Estuary has been a matter of ongoing concern for the Authority and adjoining administrative areas. The LDP addresses the issue through the work undertaken with relevant stakeholders to produce an up to date Memorandum of Understanding (MOU), (see Council response to representations on Infrastructure and Transportation below)
- The Concept Plan for the site makes clear that large portions of the site will be maintained as public open spaces and green infrastructure. This will create a connected multi-functional Green Infrastructure network across the development area
- The masterplan has been informed by ecological surveys. Evidence gathering is continuing to inform the detailed masterplanning. Landscape features such as hedges, field trees and mature tree groups are not only an important part of the sites ecological value but also the sites sense of place and are integrated into the masterplan and form part of the sites Green Infrastructure. Mature woodlands within the site, areas of priority habitat and SINCs are excluded from the development areas and will be managed and enhanced with appropriate access which prevents habitat damage
- It is acknowledged there is inconsistency in the Policy regarding the terminology used to refer to the centre of the village and this should be amended. This would not however affect the soundness of the Plan.
- The Council requires the retention of the bridleway as stated in the Policy. Detailed investigations at the Planning application stage will need to test the deliverability of the bus route and retaining the bridleway
- The SDA provides an opportunity to create a high quality attractive new sustainable urban village with community facilities and public open space within walking distance of a regional business park and its potential employment opportunities. Landscape features such as hedges, field trees and mature tree groups will be integrated into the sites Green Infrastructure. Mature woodlands, areas of priority habitat and SINCs are excluded from the development areas and will be managed and enhanced.

To deliver a sustainable public transport connection to the site a new link is proposed from the M4 J46 spur to Pantlassau Road

- Each Strategic Development Area is subject to an Independent Financial Viability Appraisal that has considered the implications of the infrastructure and affordable housing requirements on an individual site basis.
- The Welsh Government has carried out a review of the costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and has assessed the community benefits and levels of affordable housing that is viable at each site. The work carried out by the Welsh Government has enabled all infrastructure associated with development at this site to be costed as far as is reasonably possible in advance of detailed planning application stages, which provides sufficient confidence that the proposal is viable

POLICY SD H NORTH OF WAUNARLWYDD/FFORESTFACH

SUPPORT

- NRW support the place-making principals of creating a connecting multi-functional green infrastructure network throughout the site. Proximity of industrial sites highlighted and installations in Westfield Industrial Park subject to environmental regulations and potential issues for residential development
- Allocation of land to the north of Gowerton Railway Station is supported by the landowner, together with land adjacent Fairwood Terrace (in separate ownership)
- Support from landowner for the inclusion of land of the former Alcoa as part of Strategic Site H for mixed use employment, residential and education use

- Support for park and ride/transport hub to the north of Gowerton Station, but concern about traffic impact on Fairwood Terrace

SITE SPECIFIC OBJECTION ISSUES

- Impact on character of Llewitha hamlet resulting from being engulfed by development. Request proposed new road rerouted away from Llewitha due to unstable land/mine working/bog, impact on existing small holding properties, loss of privacy and tranquillity; grazing rights and access to common
- Proximity to industrial development which is subject to environmental regulations and heavy vehicle movement
- Sainsbury's Supermarkets request inclusion of reference to creation of new local centre to include commercial/retail space with active frontage at a key node within the site"
- Partially within flood risk area
- Existing parking for train station still has capacity. If Park and Ride is to be built, it needs separate access road proposed new link road. The Wildlife Trust raise loss of marshy grassland to Park and Ride and residential development in and adjacent to a Flood Risk Zone. Careful engineering required not to increase flooding for existing infrastructure
- Fairwood Terrace is not considered to be a suitable road to accommodate a further increase in traffic from either residential or Park and Ride. Insufficient road width and safety concerns regarding poor visibility at the junction to Victoria Road due to proximity to the rail bridge. Exacerbated by use of road as overspill parking on match days at adjacent RFC. Congestion issues on wider local network. Issues also regarding Pont y Cob Road access; traffic congestion; single track with weak bridges; main access for Caravan Club; rat run. Gowerton Community

Council also object to the element of the allocation adjacent to Fairwood Terrace

- Cumulative impact of combined loss of approx 7ha of woodland between land adjacent Fairwood Terrace on SD H and H 1.23 Former Gorwydd Colliery. Resultant biodiversity, climate change, air & noise pollution and surface water (loss of soak away) issues. Both are well used informal public spaces
- Land stability issues due to geology and former mine workings (sink holes, bogs etc)
- Existing field boundaries and ancient hedgerows should be retained as landscape features and for biodiversity value
- Adverse impact on health and well-being, destroy well established local community
- Objection from site promotor of large alternative site at Royal Fern challenging the sustainability and deliverability of the site
- Object to site boundary. Request inclusion of land off Bridge Road, Waunarlwydd (See Site Alternatives section)

COUNCIL RESPONSE

- The Council's vision for SD H is to enhance the strategic employment role of the existing Westfield Industrial Park by delivering a mix of employment, residential and supporting uses including educational facilities, served by a new spine street from the A484 Llanelli Link Road to the north. The site is in one of the most sustainable locations in the county having access to the newly upgraded Gowerton Station. The site is at a less advanced stage than other purely residential schemes, due in part to the complexity of landownership within the site. The Council have worked closely with landowners to define the apportionment of uses across the site, which is set out in the deposit Concept Plan. However the Concept Plan remains a high

level diagrammatic layout, which will require considerable continued, partnership working to ensure that the Council's wider vision for the whole site is delivered. Details of the diagrammatic concept plan will therefore continue to be advanced as the plan progresses to examination and any refinements could usefully be communicated to the Inspector through Statements of Common ground.

Refinements may reflect the following:-

- Progress on the site may now be accelerated due to recent changes in land ownership on the former Alcoa/Westfield Industrial Park element of the site, with new owners indicating that they are keen to progress the development of employment uses on the site. Further detail may become available on the types of employment uses proposed for the site
- The Park and Ride and residential development element of the allocation on land to the east of Fairwood Terrace) are under two separate landownerships where the landowners are collaborating to work through the site issues and explore how this site may be brought forward in advance of the wider site. Further work has been done since the publication of the Deposit Plan to explore the level of need and viable size for a Park and Ride site and it is likely that the number of spaces proposed in the Deposit will be reduced. Access to the Park and Ride is shown on the concept plan to be a limited access from Fairwood Terrace and a main access from the proposed new spine street through the site. The Council and the landowners are exploring how the Park and Ride site could be segregated in order to ensure the prevention of creation of a through route and also the potential to introduce a bus gate to provide public transport access. The Council consider that the provision of a new Park and Ride/station car park is an important element of supporting the creation of a sustainable community and

maximising the opportunities created by the rail station improvements and increasing the number of non-car transport movements from the site into the City Centre

- The Council and the landowner acknowledge that the scale of development requiring access from Fairwood Terrace would need to be carefully justified with regard to safety concerns at the junction of Victoria Road, and existing congestion issues generated by the traffic lights at Mill Street, which results in traffic backing up to the roundabout at Swansea Sound. Details of the nature of the highways improvements required would be established through a Transport Assessment. Proposed highways improvements would be required as part of any development application
- The route of proposed new link road is indicative and subject to further negotiations to address issues relating to the need to carry out a common land swap. The views of local smallholders and commoners in the Llewitha area will therefore provide useful background to discussion to determine the route of the road for future iterations of masterplan documents
- The Council has worked collaboratively with both environmental health and landowners of industrial sites to understand the nature of industrial operations on both the Westfield Industrial Park and the adjacent Timet works. Both sites are closely regulated under national and European Environmental Permitting Regulations, particularly in relation to air and noise pollution. The proximity of residential uses to industrial uses has been considered and addressed by the proposal shown on the Concept Plan to provide an area of buffer between existing employment and any potential residential uses. The exact nature of these buffer uses will be refined through discussions with the new landowner. This will also need to reflect emerging details of the new employment uses proposed for the former Alcoa element of the site
- The suggestion of inclusion of a new local centre to include commercial/retail space with active frontage at a key node within the site is an issue that can be included within ongoing site negotiations and masterplan refinements
- The presence of flood risk areas within the site boundary is acknowledged, however the concept plan has addressed this by ensuring that these areas are retained as key areas of accessible natural greenspace. The Council will ensure that these areas are retained in future iterations of the masterplan
- A key development principle in the concept plan for the strategic site is the provision of recreation and open space/green corridors. The Council acknowledge that land east of Fairwood Terrace is currently used for informal recreation and the public footpath through the site is well used. However, both the land east of Fairwood Terrace and H 1.23 are privately owned sites. Plan policies require that loss of accessible natural greenspace (ANGS) provision will need to be addressed through new development. The location of public footpaths through the site is reflected in the proposed site layout, together with proposals for new and enhanced public footways and cycleways through the site.
- The loss of woodland at site H 1.23 Cefn Gorwydd Colliery is dealt with later in this report under the “non strategic housing sites” section. Records relating to the land east of Fairwood Terrace show that this area is secondary woodland. There are no records of ancient woodland. Trees subject to TPO’s are located on the area proposed for retention as an area of natural greenspace. The site contains habitat identified in the NERC Act 2006 and would require an extended phase1 habitat survey to determine

species and habitats present on the site which may require further survey at planning application stage. Key features, hedgerows, bridleways, etc. should be retained as part of any development proposal and form natural defensible boundaries

- Existence of land contamination or instability features on or near to a site does not preclude development and a detailed ground conditions survey would need to be undertaken at planning application stage to identify and address all such issues
- The allocation of SD H seeks to deliver the Plan strategy of creating new places, which foster the health, and well-being of both existing and future residents is a key objective for the LDP. The process of detailed masterplanning seeks to ensure appropriate levels of provision of community services and facilities; this includes education, healthcare, open space/green infrastructure networks, etc. It also includes addressing all health and well-being constraints identified on a site, such as pollution, unstable/contaminated land and surface water flooding.
- Objections from promoters of alternative sites are dealt with in the Site Alternative Section of this report

POLICY SD I SWANSEA VALE

SITE SPECIFIC OBJECTION ISSUES

- Frederick Place is busy, with resulting congestion/tail backs at the lower junctions down to the traffic light at Peniel Green and on to the main road at the lights
- The proposed park and ride at Llansamlet rail station is poorly served by highways and is unlikely to be used.
- Development will cause urban sprawl
- Site includes areas of mature trees, which are home to many species of wildlife

- The protection of the Nant Bran should be a key consideration
- The proposed site is frequently flooded due to its inability to cope with surface water and foul drainage. There are culverts and ditches on site
- Amend policy to refer to the safeguarded route for the canal link from the River Tawe to the Swansea Canal

COUNCIL RESPONSE

- The principle of development at the Swansea Vale strategic site is already established by means of the existing allocation of the site for mixed use development in the Swansea UDP
- All SDAs will be expected to produce a comprehensive TA and Travel Plan to develop a strategy to manage traffic demand and transportation impacts caused by the proposal. Timely contributions to the necessary Highway infrastructure/measures will be sought, having regard to requirements in the Transport Measures Priority Schedule.
- Analysis and testing will continue regarding the most viable and appropriate size of Park and Ride facility, however the principle is considered an important element of promoting sustainable travel at this location
- There is not sufficient viable brownfield land within the County to provide for sufficient growth in new homes and employment opportunities, which necessitates the Plan to release greenfield sites based on detailed assessments of settlement boundaries (see response to LDP Strategy and Scale of Growth above)
- The masterplan has been informed by biodiversity surveys. Evidence gathering is continuing to inform the detailed masterplanning. A green infrastructure park will be created

- within the site retaining trees and strengthening existing hedgerows
- Water quality of the Nant Bran will be protected in-line with policies RP 1 and RP 3
- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on site or elsewhere from any sources including surface water
- The potential canal route is safeguarded as a green infrastructure route

POLICY SD J SWANSEA CENTRAL AREA

SUPPORT

- Policy supported by Rivington Land Ltd

SITE SPECIFIC OBJECTION ISSUES

- Pre-war and architecturally unique buildings should be preserved
- Major redevelopment plans for the St David's, Civic Centre and Kingsway must not proceed without clear demonstration of their benefits in financial and sustainability terms
- NPT Council support the principle of new retail development in Swansea City Centre, but welcome further clarification on its scale, status of development designation, and consequent likely impact on retail centres and economy
- Developments will remove off street car parking provision with no strategy for alternatives
- Castle Square re-configuration is not a responsible use of public money

- The map does not clearly show an existing and proposed network of walking and cycling routes
- Massive shortfall in new homes to be provided
- Local residents concerned by the proposed access onto Oystermouth Road from Bathurst Street
- Any development of the land opposite the observatory should consider the open space provision in the area

COUNCIL RESPONSE

- The LDP will require development proposals to preserve or enhance the County's distinctive historic and cultural environment
- The proposals for the Central Area have been derived from a substantial and robust evidence base contained in the Council approved Swansea Central Area Regeneration Framework (2016). The policy does not depart from the Framework and this can be clarified by means of further explanatory text without affecting the soundness of the Plan. It is acknowledged that shading and annotation on the Concept Plan needs to be checked for discrepancies to align with the Framework
- The Council will continue to engage with partners and stakeholders to provide more detail as the masterplanning of specific development proposals progresses towards planning application stages
- Development on the St David's site will include provision of high quality car parking to serve the development and the wider Central Area
- The proposals consider the potential for enhancing and reconfiguring Castle Square to create a more useable space, which supports activity and interest and responds positively to the setting of the Castle and Conservation

Area. Further analysis of the possible options will be required

- Measures are proposed to provide good quality, attractive, legible, safe and accessible pedestrian and cycle linkages, both to and within the Central Area, in accordance with Active Travel Design. It has not been possible to show all of these proposals on the Concept Plan but this will be a key requirement of the Policy
- 1,000 homes are proposed in the Plan period with potential for more beyond 2025. As detailed masterplanning of specific developments proceeds, there may well be justification for a higher level of housing to be provided with opportunities for high-density development. Any additional information that becomes available ahead of the Examination of the Plan will be presented to the Inspector, while the Plan will be monitored and reviewed in the future
- A comprehensive TA and Travel Plan will be completed to develop a strategy to manage traffic demand and transportation impacts caused by the proposal
- Any development proposals will need to conform to Policy SI 5 which specifies that development will not be permitted on areas of open space unless it would not cause or exacerbate a deficiency of open space provision in accordance with the most recent Open Space Assessment or the majority of open space provision is to be retained and enhanced through the development of a small part of the site

POLICY SD K FABIAN WAY

SUPPORT

- General support for the SDA from University of Wales Trinity Saint David, Swansea University, St Modwen (SM)

and Associated British Ports but with some objections to the Policy wording and Concept Plan

SITE SPECIFIC OBJECTION ISSUES

- The two main landowners want more flexibility on the land uses specified by the Plan
- The Concept Plan is too constraint-led with an apparent lack of evidential basis for many of the constraints
- Lower value employment uses will not themselves generate sufficient funding to make a significant contribution to infrastructure
- Rigid adherence to a detailed placemaking framework could stifle innovation such as the policy requirement for active frontages
- SM and Swansea University consider the 4,000 student accommodation units limit should be removed
- Tarmac intends to continue operating at SA1 throughout the Plan period. There are contradictions in the Plan as no buffers are specified around the facility
- References should be made to the proposed lock between Prince of Wales Dock and River Tawe

COUNCIL RESPONSE

- The proposed land uses are reflective of the assessment of opportunities and constraints
- The constraints are based on National Planning Policy (flood risk), National Planning Guidance (noise and wind turbines), and expert environmental health advice (Sewerage Works odour)
- Significant elements of the highways and potentially flood mitigation infrastructure may be provided by the Tidal Lagoon, while sources of funding other than just developer

contributions are being sought to contribute towards the highways infrastructure

- The Council wishes to see high quality development at this key gateway location which is why a significant element of the Policy is geared towards placemaking
- The 4,000 limit seeks to strike an appropriate balance allowing appropriate expansion of the campus into Swansea but alignment with Policy H 11 and the requirement for student accommodation to primarily be located within the Central Area
- The Plan reflects that SA1 has its own mixed use extant masterplan most recently updated under planning application 2015/1584.
- The Plan already identifies that the line of the potential canal connection will be safeguarded and enhanced including the link between Prince of Wales Dock and the River Tawe

POLICY SD L TAWE RIVERSIDE

SUPPORT

- Policy supported by Gladeborough Ltd, Swansea Community Boat Trust, Swansea Civic Society, Friends of Hafod-Morfa Copperworks

SITE SPECIFIC OBJECTION ISSUES

- That the location of some development sites are partially within Zone C2 which needs to be addressed in detail prior to examination
- Remove reference to developments should positively reflect the character contained in Cadw's Report. Replace with 'buildings of character' to be retained

- Concern that the current masterplan will not enhance the setting of the few heritage assets that remain
- Review the achievable number of units on SD L (anticipate higher density and therefore higher numbers)
- Create a new local centre to include commercial/retail space with active frontage at a key node within the site

COUNCIL RESPONSE

- In-line with LDP Policy RP 4, development will not be permitted that would lead to an increase in the risk of flooding on site or elsewhere from any sources including surface water
- The Council wishes to see the development, whether it be new build or conversion of buildings, to positively reflect the historic industrial riverside character of this area and the policy requirement is fundamental to achieving this
- It is considered that the policy provides a strong framework for ensuring development proposals positively reflect the historic industrial riverside character
- The Council will continue to work closely with the site promoters on the detailed masterplanning of the Scheme. Any robust evidence that emerges can be presented to the Inspector at the time of examination
- Further masterplanning is required of parts of the site where it has been identified that there is potential for residential or employment uses. Analysis of the need for supporting amenities and infrastructure will form a key aspect of this masterplanning

4. HOUSING SITES (NON STRATEGIC AND 'RURAL EXCEPTION' SITES)

STATISTICAL SUMMARY

POLICY H 1 – NON-STRATEGIC HOUSING SITES

Representations on Policy H 1 housing sites mainly relate to:

- Comments on H 1 allocated sites (requests for deletion, amendment or clarifications)
- Requests for allocation of additional or replacement sites (either former 'Candidate Sites' which the Council have rejected for allocation in the LDP or new sites for consideration – see section on Alternative Sites and Boundary Changes below)

SUPPORT

- Supporting representations received from site promoters and landowners.

OBJECTION ISSUES

The majority of representations raised issues that followed common themes. For example, impact on transport network/highway, community and cultural impact, scale of growth, environment, water and drainage, Primary Health Care, education. Many of these are covered in the responses to representations on Strategic Development Areas and LDP Strategy/Scale of Growth (see section above).

The section below highlights some specific issues raised on particular sites

- Loss of area of woodland TPO on part of **H 1.23 Land at Cefn Gorwydd Colliery**. which is in regular use as accessible open greenspace by local residents
- Land instability at **H 1.23** due to old mine workings on site. Concern that will result in collapse and subsidence to existing houses
- Impact on biodiversity designations (SSSI, SINC, NERC) on **H 1.23, H 1.9 Land at Graigola Road, Glais, H 1.46 Land at Mynydd y Garnllwyd Road, H 1.27 Land at the Poplars, Pontlliw**
- Previous planning applications refused at **H 1.9**, impact on PROW on the site
- Approval of development at **H 1.26 Land at Carmel Road, Pontlliw** will set a precedent for development in the open countryside and the coalescence of Pontlliw and Pontarddulais
- Object to **H 1.27 Land at the Poplars, Pontlliw**. Land restricted by condition of sale for use in connection with children in perpetuity. Concern that previous planning gains secured in area were not fulfilled by developers
- Object to **H 1.46 Land at Mynydd y Garnllwyd Road**. Loss of open space will have a negative impact on health and well being, and remove a safe access route to Llewellyn Park. Site should be designated in the open space assessment. Site was previously compulsory purchased to prevent housing development and previous planning applications refused to retain green land for recreation purposes
- CCS not followed WG guidance on consultation. Residents of Stepney Road not consulted on the development at **H 1.43 Land at Cockett House, Cockett**.

COUNCIL RESPONSE

- Natural, cultural and recreational value of the land at Cefn Gorwydd Colliery (H 1.23) is recognised by the Landowner who has submitted a number of technical studies which inform the proposed site layout. This includes a proposal to create a Nature Conservation area in the northern part of the site currently used by local people which will be maintained under a management agreement to ensure its safe use into the future and formalise the currently unauthorised public use of this privately owned land.
- With regard to the specific issue of protected trees on H 1.23, the Woodland Trust has confirmed that the site is not ancient woodland. The site is the subject of a woodland tree preservation order which protects groups of trees rather than specific individual trees. The landowner carried out a tree survey in 2011, which was updated in November 2014 with further subsequent survey work. The survey contains a detailed assessment of the location, type and condition of the trees on the site which has informed the location of development, ensuring that only on those areas surveyed as being of poorer quality are included within the development area
- The issue of land stability at H 1.23 was raised by the site promotor at the candidate site stage when a Geotechnical Desk Study report was submitted. The issue is highlighted in the development requirements set out in the table of Policy H1 allocations which requires that development should include the stabilisation of old mine workings to improve public safety. Deposit Policy RP 6 seeks to ensure that land stability issues are taken into account at the planning application stage in order to ensure that development is not exposed to, or does not create, significant risks from land instability
- Development judged to have a significant adverse effect on the integrity of any European Designated Sites, either alone or in combination with other plans or projects, will not be permitted. H 1.23 does not contain a SINC or SSSI designation. H 1.9 contains habitat identified in the NERC Act 2006 and would require an extended phase1 habitat survey to determine species and habitats present on the site which may require further survey at planning application stage
- Allocation of H 1.9 Land at Graigola Road, Glais does not contain a PROW. However, the Plan expects all new development to provide linkages and extensions (where appropriate) to the existing PROW network in line with the Council's statutory duty to protect the County's PROW network
- The LDP process requires the Council to review all existing policies and designations (this includes UDP green wedge and settlement boundaries) afresh, which inevitably leads to updated decisions being made between development plans to ensure the Council meets its statutory duty. Housing sites have been selected following a detailed appraisal process that requires the proposal to conform with the Plan strategy and sustainable development objectives. The appraisal process included consideration of the existing social and physical capacity within each area, as well as the presence of environmental constraints and the extent to which development can provide, or compensate for, necessary additional social or physical infrastructure. A review was undertaken of all Green Belt/Wedge designations and settlement boundaries to evaluate the need and justification for allocations throughout the County. It was concluded that the housing allocation meets the Plan's strategy and sustainable commitments and has passed a detailed appraisal process. The Council maintains that the allocations will not

result in coalescence; as they constitute sustainable extensions to the settlement boundary and the rounding off the settlement in an appropriate manner. The green wedge assessments conclude that no green wedge was necessary as the distance between Pontarddulais and Pontlliw was more than 1500 metres

- The Council is aware of a legal agreement relating to the land on the ridgeline to the north of Cefn Coed Hospital. Negotiations will need to be undertaken between the relevant parties to resolve the legal agreement through the appropriate legal process. Previous lack of fulfilment by developers with regards to planning gains
- Land at H 1.46 Land at Mynydd y Garnllwyd Road is classified as Tier 1 & 2 Accessible Natural Greenspace (ANGS) as outlined in the Open Space Assessment (OSA). Mynyddbach has 5.6ha of ANGS over the recommended target and the majority of residents have sufficient access to a Tier 1 greenspace. The whole county has sufficient access to Tiers 2 to 4 ANGS. The land has no Fields in Trust designation as defined in the OSA. Mynyddbach has sufficient provision of FIT in the ward. Any accessibility issues close to the allocation can be addressed by detailed measures on individual planning applications. The Council would seek to address this issue. Residential developments with a capacity of 10 units or more must include the creation of new on site facilities or the improvement of existing local provision off site, along with appropriate maintenance contributions. The Council recognises the important benefits open space has on health and well-being which an inherent part of the Plan making process and is embedded throughout the Plan reflecting the Welsh Government's Vision of healthy, cohesive communities as set out in the Wellbeing of Future Generations Act.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- An amendment to Policy RP 4 Flood Risk to clarify the flood issues and constraints that Non-Strategic Housing sites will need to have regard to.

POLICY H 5 – RURAL EXCEPTION SITES

OBJECTION ISSUES

- Location of allocations within or adjacent to the Gower AONB and issues of resulting environmental impact, specifically the landscape impact on AONB
- Objections to the principle of “rural exception” sites as set out in H 5 and its compatibility with National Guidance received from both individuals and key stakeholders, including from Welsh Government. WG question how the policy relates to the evidence base that the need in Gower and Gower Fringe zones is for affordable housing only
- Some objectors suggest that the Policy objective is more soundly dealt with by means of the criteria based assessment set out in the second part of Policy H 5 rather than specific site allocations
- Clarification required regarding definition of ‘local need market housing’ and how Council will apply resale values and occupancy restrictions
- Confirm that unit tenure and mix considerations may be informed by information from applicants
- Impact of local needs restriction for open market properties on viability and delivery of affordable housing in area of high need

- Failure in transparency and errors and omission in relation to site information during LDP process, particularly inaccurate Proposals map relating to Three Crosses
- Loss of good quality agricultural land at both Three Crosses and Pennard sites
- Highways and Access: Concerns about the effects of increased traffic on all the access roads to the sites. Infrequent bus route and lack of footpaths, especially walking to school on single track roads
- Concern about the continued viability of Three Crosses as a village community
- Unstable ground with coal mine tunnel (Penlan seam) on Three Crosses sites
- Lack of rural employment opportunities in Pennard
- The site is too large to meet perceived low affordable housing needs of area
- Objections to low percentage of affordable housing. How will local occupancy criteria met
- Relationship of Pennard site to AONB boundary difficult to ascertain from Proposals Maps
- Include Pennard site under Policy H 1 rather than the exceptions site
- Alternative site suggestions (See site alternative section)

COUNCIL RESPONSE

- The LDP is clear that the primary objective for designating AONBs is the conservation and enhancement of their natural beauty. However, regard also has to be had to the economic and social well-being of such areas. AONB designation does not prohibit the development of new housing. Current national and local planning policy permits exception sites for local needs affordable housing adjoining Gower AONB/Fringe settlements and this prevailing

situation will remain unchanged regardless of whether or not the site is allocated for development. The LDP contains policies and links to SPG that will ensure any future development respects the landscape and the character of the area. Whilst the Pennard Site lies wholly in the AONB, one site in 3 Crosses lies outside the boundary and the other adjacent to it

- Whilst the Council considers that an alternative Policy approach suggested by WG, to bring the proposed sites into settlement boundaries has the potential to broadly deliver the Council's objectives for rural housing sites, this change may reduce the ability to ensure the market housing elements of the site are geared towards a local need.
- The Council acknowledge that the LHMA does not identify a need for market housing in these areas. The supporting text to Policy H5, explains that the Policy seeks to respond to the issue of the sites identified being large in relation to the settlements in which they are located. A mix of tenure types (affordable and market housing) is therefore considered to be necessary, for the purpose of creating sustainable communities. The Plan also highlights the issue of the reduced the viability of delivering 100% affordable housing without an enabling element of market development. The Council therefore consider Policy H5 to represent a pragmatic approach to addressing these issues whilst still ensuring that the opportunities to deliver affordable housing are maximised in accordance with the affordable housing strategy set out in Policy H 2.
- The inclusion of an element of Local Needs Housing in Policy H5 demonstrates the Council's commitment to delivering a sustainable range of mix and tenure which meets the needs identified in the LHMA. This includes the needs of older persons and those wishing to form new households in their local area. Evidence in the AHVS

shows that the residual land values in the area are sufficiently robust to support the Local Needs Policy. The Council acknowledge the drafting error on the published Deposit Plan Proposals Map relating to site H 5.2: Land to the east of Gowerton Road, Three Crosses, which indicated a larger site for allocation than was approved for inclusion in the Deposit by the Council on the 24th September 2015. An amendment to the site boundary is therefore appropriate as a means of clarification. The amendment would not however affect the soundness of the Plan

- Both sites in Three Crosses are grade 3 agricultural land which is Low Probability BMV. The Council acknowledge that the agricultural land in Pennard is Grade 3a, however there is no indication loss of land would impact on viability of a wider agricultural holding. The Council's priority is to deliver development needs on lower grade land wherever possible, where there has been an overriding need for development to fulfil the LDP Strategy as there is no other suitable location in which housing/employment allocations can be situated this has resulted in some allocations, or parts thereof being situated on BMV land
- The site assessment process has concluded that Site H 5.2 can be safely accessed from Gowerton Road. A Transport Assessment has been submitted as supporting evidence to the allocation, which states that the proposed access works required will provide the opportunity to deliver wider benefits to the local highway and footpath network. Suitable access to can be provided to H 5.3. Local highway network and footpath network improvements would be required in conjunction with any development on the site
- The Council does not consider that some 35 new dwellings in Three Crosses will detrimentally impact on the viability of the village community. Impacts will be managed in

accordance with Policy SI 8 which states development must be designed to promote safe and secure communities and minimise the opportunity for crime

- A mining report has been submitted in support of site allocation H 5.2 and will be sought for allocation H 5.3 during the planning application process
- LDP policies will require any development to be designed in accordance with principles of good design to ensure that the design, layout and orientation of proposed buildings do not significantly adversely impact upon amenity
- The rural exception sites have been allocated having regard to the need to balance the relationship between market housing and affordable need, as well as individual site constraints and opportunities. The site sizes are considered appropriate on this basis.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amend site boundary of *H 5.2: Land to the east of Gowerton Road, Three Crosses* to correct the drafting error on the published Deposit Plan Proposals Map.
- Amend boundary of Rural Exception Site H5.1 Land at Monksland Road, Scurlage to that agreed by Planning Committee.

5. ALTERNATIVE SITES AND BOUNDARY CHANGES

SUMMARY

A number of representations were received seeking additional or alternative allocations for primarily residential development, along with other amendments/adjustments to delineations on the Proposals Map. Approximately 40 sites were put forward by consultees for consideration; these are listed over the page for ease of reference.

A further 20 submissions sought changes to settlement boundaries and 21 submissions sought change to site boundaries proposed in the Deposit Plan. A Register of Alternative Sites setting out the details of each alternative site request will also be submitted as an examination document. The Register also sets out details of the 35 representations requesting the deletion of an allocated site.

OBJECTION ISSUES

- The majority of alternatives were proposals to extend the urban settlement boundary into open countryside. Non-strategic sites (capable of accommodating more than 10 units but less than 500) were proposed by consultees at a range of 'Strategic Housing Policy Zone' locations as follows:
 - **Greater North West:** Gowerton (Pen y Dre), Loughor (to the north adjacent the Estuary and south of Loughor and Kingsbridge), and Penllergaer (south of existing Parc Penllergaer and north of the existing village), Grovesend, Llangyfelach,
 - **North:** Morryston/Pantlassau (North West of Morryston Hospital and at edge of settlement at Gwerfadog) and Birchgrove

- **West:** Killay, Newton, Tycoch and West Cross
- 6 of the alternative non-strategic sites proposed were relatively large, between 11-15 hectares each, including sites at Loughor, Morryston and Penllergaer
- A number of small scale sites were proposed in more rural areas such as Garnswllt, Llanmorlais and Scurlage
- One alternative Strategic Development Area was put forward at Llangyfelach on land south of the A48 (referred to by the submitter as Coed Dewi Sant), which would be capable of accommodating more than 500 units plus new school, open space, recreation and local/district centre). The site is entirely greenfield in proximity to the 'Royal Fern' golf course area. The submission refers to 'development potential' outside the LDP period of additional land to the west of the alternative site, as far as Penllergaer Business Park
- Representations also sought adjustments to site boundaries, including bringing areas of proposed open countryside on edges of urban areas into settlement

COUNCIL RESPONSE

- Approximately half of the alternative site proposals had previously been submitted as Candidate Sites and therefore have been comprehensively assessed as not suitable. The remaining alternative sites have been appraised but are similarly not considered preferable to sites allocated in the Deposit, having regard to their relative merits
- The Council contends that the spatial growth strategy and corresponding range/choice of sites identified for housing in the Deposit Plan represents the most appropriate, viable and effective mechanism for meeting the requirement for new homes over the Plan period.

- It is not considered necessary to allocate further land for residential development above and beyond the Deposit allocations and the alternative sites submitted do not present preferable options for allocations
- The Council would support minor amendments to site boundaries that reflect factual updates e.g. extant planning permission

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Extend the settlement boundary at Mumbles to include the entire Mumbles Pier development site, which benefits from planning permission.

List of Proposed New Sites and Boundary Amendments submitted by Objectors to Deposit LDP

Extract – Register of Alternative Sites – PART A: New Sites

Alternative Site Ref	Electoral Ward	Site Name	Proposed Alternative Use
AS(N)001	Gower	Frank's Field, Scurlage, Gower	Residential
AS(N)002	Sketty	Land at Huntingdon Way, Sketty	Residential
AS(N)003	Dunvant	Land at 104 Killan Road, Dunvant	Residential
AS(N)004	Llangyfelach	Land North West of Morriston Hospital, Morriston	Residential
AS(N)005	Llangyfelach	Land South of Rhydypany Road, Pantlasau	Residential
AS(N)006	Killay North	Land at Hendrefoilan Road, Killay	Residential
AS(N)007	Llansamlet	Land at Garth Road, Glais	Residential
AS(N)008	Penryheol	Land South of Plas Road, Grovesend	Residential
AS(N)009	Newton	Lady Housty House, Newton	Residential
AS(N)010	Sketty	Land at Llwyn Mawr Road, Tycoch	Residential
AS(N)011	Morriston	Land at Parc Ceirw, Cwmrhydycyrw Quarry, Morriston	Residential
AS(N)012	West Cross	Land off Chestnut Avenue, Clyne Common, West Cross	Rural Exception Site
AS(N)013	Upper Loughor	Land at Borough Road, Loughor (Larger Site)	Residential

Alternative Site Ref	Electoral Ward	Site Name	Proposed Alternative Use
AS(N)014	Upper Loughor	Land at Borough Road, Loughor (Smaller Site)	Residential
AS(N)015	Penllergaer	Land at Bryn Rhos, Penllergaer	Residential
AS(N)016	Penyrheol	Land at Coalbrook Road, Grovesend	Residential
AS(N)017	Mawr	Land off Parc Derwen, Heol y Garn, Garnswllt	Residential
AS(N)018	Llansamlet	Land at Heol Las, Birchgrove	Residential
AS(N)019	Kingsbridge	Land at Loughor Road, Gorseinon	Residential
AS(N)020	Penllergaer	Land at Coedwig Hywel, Penllergaer (Option 1)	Residential
AS(N)021	Penllergaer	Land at Coedwig Hywel, Penllergaer (Option 2)	Residential
AS(N)022	Penllergaer	Land at Coedwig Hywel, Penllergaer (Option 3)	Residential
AS(N)023	Morrison	Land at Buan Llwyd Farm, Morrison	Residential
AS(N)024	Kingsbridge	Land South of Loughor Road (and Highfield), Kingsbridge	Residential
AS(N)025	Bishopston	Land off Manselfield Road, Murton	Residential
AS(N)026	Gorseinon	Land at Park Road, Gorseinon	Residential
AS(N)027	Llangyfelach	Land South of A48, Llangyfelach	Residential
AS(N)028	Gowerton	Gowerton Caravan Club, Pont y Cob Road, Gowerton	Residential

Alternative Site Ref	Electoral Ward	Site Name	Proposed Alternative Use
AS(N)029	Gowerton	Land North West of Pen y Dre, Gowerton	Residential
AS(N)030	Gowerton	Land South of Pen y Dre, Gowerton	Residential
AS(N)031	Cockett	Land off Bridge Road, Waunarlwydd	Residential
AS(N)032	Upper Loughor	Land to the West of Cae Duke, Loughor	Residential
AS(N)033	Upper Loughor	Land at Culfor Road, Loughor	Residential
AS(N)034	Penyrheol	Land off Station Road, Grovesend	Residential
AS(N)035	Penclawdd	Land at Hendy Road, Penclawdd	Residential
AS(N)036	Bonymaen	Land at Carmel Road, Winch Wen	Residential
AS(N)037	Gowerton	Former Railway Cutting at Woodlands, Gowerton	Protection
AS(N)038	Morrison	Land at Pant Lasau Road, Holly House Farm, Morrison	Residential
AS(N)039	Oystermouth	Land at Thistleboon Caravan Site, Mumbles	Residential
AS(N)040	Llansamlet	Land at Clase Road, Llansamlet	H 6

6. FINANCIAL VIABILITY, DELIVERABILITY AND PHASING

SUPPORT

- Welsh Government is supportive of the Plan's Spatial Strategy and highlight that a critical element for the Plan will be the phasing, timing and delivery of sites, ensuring that the Plan delivers the scale of growth in locations to meet the needs across the entire Plan period. The Welsh Government commends the significant amount of detailed viability work already embedded in the Plan. In particular work undertaken to include site constraints, schematic frameworks, and developer and infrastructure requirements which confirm the master planning approach to ensure good design and comprehensive development

OBJECTION ISSUES

- WG highlight that many of the key sites are dependent on infrastructure improvements, which need to be costed, such as sewerage capacity and transport, the significance of which may have a detrimental impact on the viability/timing of sites. WG advise that the Council will need to demonstrate that both individual sites and sites in combination are genuinely available and deliverable. Site promoters should continue to be involved in the process and understand the importance of demonstrating delivery.
 - The Council should clarify that it is confident that the lack of CIL charge being in place will not affect the delivery of sites and key infrastructure
 - Objection to the lack of detail provides in the Plan on an site viability work undertaken, which needs to recognise the likely market demand for housing in the chosen location and the impact of the costs of significant developer requirements set out in the SD Policies
- Request that more non-strategic sites are allocated to deliver in the short term, as SD's will not be delivered until the latter stages of the Plan, which is highlighted as important given the current lack of a five year land supply and the Plans high reliance on SD sites
 - Further information requested on how the implementation plan was created and whether it assumes that planning applications on SD sites will be determined in advance of the Plans adoption, and that planning applications will be determined by the end of the second five year period of the Plan [2020]
 - The potential for some of the SDA's to under deliver in the early years of the Plan could impact on the five year land supply.
 - Clarification sought on how and when the Council owned land will be brought forward

COUNCIL RESPONSE

- The issue of viability and deliverability relating to the impact of infrastructure requirements is set out in Section 2.4 of the Plan. Section 4 of the Plan entitled 'Monitoring and Implementation' contains phasing tables for the delivery of both Strategic and non-strategic sites
- The Council's strategy is to focus development on strategic sites in order to secure the community and infrastructure benefits necessary to create sustainable communities. Whilst the phasing tables acknowledge that some of these sites will be delivered towards the latter end of the Plan period, other sites are at a more advanced stage and can be delivered earlier. The Council is also confident that the housing growth strategy will deliver a sufficient supply of non-strategic sites, windfall sites and extant permissions in the earlier stages of the Plan period. The housing growth strategy is considered to be sound and no further non-strategic sites are considered to be required in order to deliver the Plan's housing requirement.
- Work to prepare a housing trajectory will be advanced, as it is considered a useful means of clarification of how the Plan's allocations will be delivered over the Plan period. This information can be prepared for consideration by the Inspector at the examination. The provision of additional information would supplement the existing evidence base and would not affect the soundness of the Plan.
- The Council has worked collaboratively with site promoters and infrastructure providers of strategic sites to ensure that as much detail as possible regarding development requirements is set out in the SD Policies and concept plans. This ensures that Developers are aware upfront of the likely development costs. Discussions on these sites are ongoing and Statements of Common Ground will be prepared with relevant interested parties to ensure any updated details to policies and masterplans are reflected. This will also ensure that the most up to date information is available to the Inspector at the Examination stage.
- The designated Strategic Development Areas have been subject to Independent Financial Viability Appraisals (IFVAs). Development Requirements and placemaking principles set out in the SD Policies have been properly taken into account in the masterplanning process and that the Council's aspirations for delivering quality new communities at these strategic sites are realistic and deliverable within the Plan period
- Comprehensive updates to the IFVAs have been done for each residential led Strategic Development Area in response to representations made. This includes updates to detailed costs of infrastructure required to come forward in association with development, as set out in the Deposit LDP, and confirmation of the community benefits and levels of affordable housing that is viable at each site. Such an update to IFVAs has enabled all infrastructure associated with development to be costed as far as is reasonably possible in advance of detailed planning application stages. This update work has confirmed the viability and developability of the allocated SDAs

7. AFFORDABLE HOUSING

SUPPORT

- Trustees of Morris Estate Support Affordable housing policies which are considered to be sound and in line with national planning policy
- Support for approach of 50% affordable housing on Gower and Gower Fringe. Reduces number of homes going to second homes

OBJECTION ISSUES

POLICY H 2: AFFORDABLE HOUSING STRATEGY

- Welsh Government requires further clarification of assumptions within the evidence upon which the housing need and affordable housing targets set out in Policy H 2 are based
- WG request explanation of the apparently low level of affordable need in comparison to similar LPA's and explanation of the relationship between the level of housing provision and the affordable housing target
- The affordable housing target should be amended to account for the whole Plan period and not 2017 to 2025
- The inclusion of a table is suggested to show the breakdown of how the Plan will deliver the level of affordable housing set in the target
- Add wording to explain what contribution windfall sites might make to total Affordable Housing supply
- Justify figures of 200 and 300 homes for Gower and Gower Fringe and clarify how prices will be kept affordable
- Policy H 2 suggested to be unsound and in conflict with national planning policies for exception sites for rural local needs affordable housing. The fifth paragraph of Policy H 2

should be amended by deleting "majority" and "supported by a minority element of market housing"

- The policy should do more to encourage developers to provide bungalows and housing appropriate for elderly and disabled people

POLICY H 3: AFFORDABLE HOUSING (AH TARGETS)

- WG and others request clarification of the relationship between the evidence base and the targets and thresholds set in the policy. This includes clarification of the relationship between LHMA and AHVS geographies
- WG request clarification of how costs of sprinklers and s106 contributions have been taken into account
- Site threshold of 5 or more dwellings considered too low and harmful to the delivery of market and affordable housing. Amend Policy to revert to UDP threshold of 25 units or 1ha of land
- Policy should acknowledge the scale of other contributions required on Strategic Development Areas as per the Criterion in Policies SD 2 and IO 1. Details of specific site requirements on strategic and other sites are not known until full site investigations are undertaken, detailed costings available and site viability work complete
- Several objections, particularly from strategic site promoters request explanation of the role of viability should be brought into the Policy itself to make clear that affordable housing requirements will be "subject to viability" to better reflect the requirement to consider viability set out in national policy
- The HBF object to the 50% affordable housing requirement on sites in the Gower and Gower Fringe SHPZs, along with the threshold of 2 units and consider this to be an 'anti-development policy'

COUNCIL RESPONSE

- The Council supports the notion of a table being produced setting out a breakdown of how the affordable housing target will be met. This would provide useful clarification in the Plan
- Issues relating to Rural Exceptions sites are dealt with in the H5 section above
- With regard to Viability, the Plan states that in the first instance, the % target contributions set out in the Plan will be sought on site. However, the text does acknowledge that in certain developments the Council will need to work with Developers to agree an appropriate contribution and appropriate viability evidence will be required
- The Council consider that the thresholds and targets set in the Policy are sound and are based upon robust evidence.
- Provide additional supporting text to bring the Plan in line with National Planning Guidance and ensure that the Council is able to conduct well-informed negotiation with regard to the mix of dwelling sizes and types.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amend Policy H2 and supporting text to clarify how the target relates to the entire Plan period. Provide a table to clarify the elements of affordable housing provision.
- Amend supporting text to Policy H2 to clarify the contribution that all Policy mechanisms to secure affordable housing set out in Policy H2 will make over the plan period.
- Amend supporting text to Policy H3 to ensure that consistent terms relating to affordable housing targets are used between the supporting text and Policy.
- Amend Policy to clearly set out the role of viability (currently set out in Para 2.5.20). To ensure that the Policy makes clear that affordable housing requirements will be "subject to viability" to better reflect the requirement to consider viability set out in national policy.
- Amend supporting text to H3 to remove erroneous reference to negotiation of commuted sums on single units.

8. INFRASTRUCTURE AND TRANSPORTATION

SUPPORT

- Support from Natural Resources Wales

OBJECTION ISSUES

- Concern that necessary infrastructure will be provided and at the right times to mitigate the impacts of development
- Request for the inclusion of an infrastructure delivery plan and programme
- Council should provide draft of Planning Obligations SPG in advance of the Examination. Highways congestion and safety concerns stated relating to specific areas where strategic and non-strategic housing is proposed
- Challenges received to the robustness of the methodology of the Strategic Transport Study
- Network Rail request a new Policy requiring developers to fund qualitative improvements required to existing rail infrastructure as a direct result of increased rail patronage from new developments
- Include a strategy to deliver public transport from rural areas to district centres, retail parks, key places e.g. Morriston Hospital; and also connecting the outer settlements with each other
- Concerns regarding Waste Water Treatment Works (WWTW) capacity raised frequently by site-specific objections particularly with regard to the Gowerton WWTW and developer requirement to contribute to SUDS to help mitigate this situation. Provide site-specific information on necessary upgrades to sewerage and water infrastructure, in conjunction with DCWW, along with the cost, timing and inclusion in the rolling DCWW Asset Management Plan (AMP). Explain phasing and delivery of sites, particularly

where contributions to improvements need to come forward in advance of DCWW's AMP planned schemes

- WG advise that the Council should clarify if the Memorandum of Understanding (MOU) has been reviewed to ensure sufficient capacity to accommodate proposed Plan allocations in the catchment area

COUNCIL RESPONSE

- The LDP makes clear at Policy IO 1 that development must be supported by the infrastructure and facilities considered appropriate and necessary to support the proposal and its impacts. Proposals will be required to satisfactorily demonstrate that, either existing infrastructure provision and capacity is sufficient to support the proposed development; or, where there is a deficiency in provision or capacity, that arrangements are in place to support the development with new or improved infrastructure, facilities or other measures. Where necessary, Planning Obligations will be sought to ensure the effects of development are fully addressed to make the development acceptable, which will include addressing any identified deficiencies in infrastructure provision or capacity. Significant development will be masterplanned to ensure it comes forward in a co-ordinated fashion with the delivery of necessary supporting infrastructure
- It is not necessary to prepare the SPG in advance of the Examination. The Plan contains sufficient detail both to enable the negotiation of contributions prior to the adoption of the Plan and to facilitate the examination of Policy. This approach will also enable the SPG to be based on adopted LDP policies.
- Given the scale of required future growth in jobs, homes and overall population there will inevitably be greater levels of traffic across the County in future years. This will lead to increased congestion across the network, which could give

rise to unacceptable impact unless appropriate mitigating transport measures and new infrastructure are delivered. The LDP thereby represents an opportunity to set out a coherent approach to land use and transport planning which addresses the County's transport needs in the context of future growth as well as existing network constraints and issues. A Strategic Transport Model Study undertaken for the Council by consultants examined these issues, identified the cumulative impacts of the LDP allocations and set out a Transport Measures Priority Schedule to address the impacts. LDP Policy will require Planning Obligations to be used where necessary to make developments sustainable and deliver enhancements as required, having regard to individual Transport Assessments. LDP policy makes clear that development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted. This overall approach, and the robust evidence base provided by the Strategic Transport Study, is considered a sound foundation for the allocations made in the Plan

- The Strategic Transport Study was commissioned by the Council to consider the impact of Plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. This Study has been important in providing a thorough independent assessment of the likely impact of the Plan's strategy for growth. It has measured the cumulative impact of estimated traffic growth arising from all the allocations and proposes mitigating measures that may be required subject to further testing, including corridor and junction improvements, the importance of a connected and coordinated public transport system on key corridors and the improvement of the Active Travel network. The Council is confident in the expertise and experience of the consultant and the comprehensiveness of the methodology employed, which is consistent with wider analysis undertaken by Welsh

Government in other parts of Wales. It represents a joined up approach to land use and transport planning

- It is not considered necessary for an additional policy on rail infrastructure as the existing Transport Policy Framework will ensure that development will be supported by appropriate transport measures and infrastructure. Developments will be expected, where the Council deems the potential transport implications significant, to produce a comprehensive Transport Assessment and Travel Plan to consider all modes of transport, and the relating demand and impacts caused by the proposal. Contributions to the necessary Highway infrastructure/measures will be sought, having regard to requirements in Appendix 5 of the LDP and any other measures identified as necessary to mitigate the impacts of the development. These improvements will be required to be delivered in a timely manner to meet the needs of existing and planned Communities
- Enhanced connections from rural areas to district centres, out of centre retail parks and key places such as Morriston Hospital; and better connections between these rural areas is something for the Council's Local Transport Plan to consider which sets the strategic transport and accessibility policy framework which is taken forward in land use terms by the LDP in how it relates to proposed new development. The Plan will though ensure that new development will be required to reduce reliance on car use by maximising the potential of movement to/from the development by public transport and deliver new transport infrastructure and improvement measures required to mitigate the impact of new development
- The Council has consulted with DCWW, who have, throughout the Plan preparation process, provided information about the impact of development on WWTW capacity. Further information was submitted as part of DCWW's Deposit Plan representations in respect of all allocated sites. The Council would support the inclusion of

further detail in the Plan for clarification/factual updating which would not affect the soundness of the Plan. Due to the regulatory, financial and legislative framework that DCWW has to work within there is the potential for disparity in the timeframes of the AMP and LDPs. Development that requires infrastructure improvements in advance of delivery through DCWW's investment programme AMP will be required to provide an appropriate contribution to secure the provision of the infrastructure

- To date, waste water capacity issues associated with planning applications have been addressed through a Memorandum of Understanding (MOU) agreed between the Council, Carmarthenshire County Council, Natural Resources Wales (NRW) and Dwr Cymru Welsh Water (DCWW). The agreed approach centres on removing surface water from the waste water treatment infrastructure to increase capacity for the treatment of foul water.
- To ensure there is sufficient capacity to accommodate allocations made in the Plan the MOU is in the process of being revised to specify the partner organisations commitments to the delivery of the development plans in the MOU area. In the long term DCWW, as the statutory sewage undertakers are committed to ensuring that the sewage infrastructure requirements of the sites allocated in the Plan will be addressed through appropriate investment via their Asset Management Plans.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amend supporting text to Policy RP 3 to refer to the fact that a Nutrient Management Plan for the Bury Inlet may be required.
- Amend introductory sections to the Plan to include updated reference to the current position relating to the review of the Burry Inlet Memorandum of Understanding. The following

Topic Papers have also been revised to include the updated position on the MOU.

- Environmental Constraints and Pollution Topic Paper (Revised 2017)
- Physical Infrastructure Topic Paper (Revised 2017)

9. GYPSY AND TRAVELLER REQUIREMENTS

SUPPORT

- Neath Port Talbot County Borough Council welcome the site allocation.

OBJECTION ISSUES

- Clarification sought from Welsh Government (WG) and Neath Port Talbot County Borough Council regarding the number of pitches allocated at site H 6. WG require that the Policy shows that the site is sufficient in scale to meet the identified need over the entire Plan period and that the pitches can be delivered in the identified timescales set out in the Gypsy and Traveller Needs Assessment
- Flood Risk Issues: WG and NRW state that it is essential that a Flood Consequences Assessment is undertaken prior to the LDP Examination to demonstrate that the site can be delivered in line with the requirements of TAN 15
- Families currently living on the unauthorised tolerated site at Millstream Way express a desire to remain living there. Level of flood risk at Millstream Way perceived to be no worse than at proposed H 6 site. Families enjoy the privacy and security of Millstream Way, which is convenient for school and local facilities. Families state that they would not like to live at the H 6 allocated site, though do not object to the site's allocation. Some identify a potential alternative site they would like to be considered on land south of Clase Road, if remaining at Millstream Way is not an option
- Families living on the Authorised site, Ty Gwyn, adjacent to the allocated H 6 site object to the smaller land parcel closest to their site. One family objects to the entire allocation. Some support was given to the larger allocated land parcel if the site was appropriately designed and managed effectively.

- Provision for Travelling Show People: WG require clarification regarding the site at Railway Terrace, Gorseinon, and its suitability and deliverability to meet the identified need for Travelling Show People over the Plan period. Site to comply with PPW (13.3), and TAN15 (6.2) regarding Category C2 flood risk

COUNCIL RESPONSE

- A FCA and other technical studies will be undertaken to determine the detailed site capacity and delivery costs. Further clarification will be provided at an appropriate stage to set out the timescales at which the site will be provided.
- These are issues, which can be addressed through further ongoing discussion with key stakeholders, to ensure that a solution can be provided to the Inspector for discussion at the round table sessions at Examination. Any amendments proposed to the Policy as a result of this work would improve clarity but are not considered to affect the soundness of the Plan.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amendments to the criterion of Policy H7 for the purpose of ensuring that the Policy is in compliance with Circular 30/2007.
- Minor amendments to correct typographical errors on Proposals Map notations.

10. ECONOMY AND EMPLOYMENT

OBJECTION ISSUES

- Target for new job creation suggested to be unrealistic and could be subject to change in light of potential economic impact of recent EU Referendum result
- Welsh Government suggest amendments could clarify how the Plan will provide the 16ha of B Class employment land that evidence suggests is required. SD site policies should identify scale (ha) of available employment land and explain how the two regionally significant sites e.g. Felindre, and further seventeen existing safeguarded employment sites identified in the evidence base (Employment Land Review (2012)) are accounted for in the Plan to demonstrate there is no over-provision
- Welsh Government advise that the Council consider the need to align with TAN6 (National Guidance) for determination of applications on unallocated employment uses on the edge of settlements and home based working

COUNCIL RESPONSE

- The LDP policies relating to employment sites and economic development strategy are founded on a sound evidence base (Economic Growth and Employment Land Assessment (2012)), which was formulated on a cross boundary basis and has been 'tested' at Examination on the adjoining Authority's LDP. The allocations made in the Swansea LDP are in alignment with the evidence. Notwithstanding this the Council would support clarifications or refinements that seek to make clear the size of allocations and the 'flexibility allowance' provides for the necessary employment land and meets the recommendations of the Study. Any such changes would not affect the soundness of the Plan

- Matters relating to disputes on specific job numbers and methodologies relating to future economic growth are typically dealt with at examination, which has been common practice for all LDPs in Wales. This enables all parties, and the independent Inspector, to have regard to any actual evidence that may ultimately be submitted to the examination to offer an alternative analysis to the Council's existing published evidence base on growth projection, such as any potential quantifiable impact of the UK leaving the EU. The evidence base relating to projected level of economic and housing growth, and corresponding assessment of implications for LDP Strategy and allocations will be reviewed prior to examination. This review includes the implications of: the updated details of the proposed City Deal for the Swansea Bay City Region; any macro-economic changes that have arisen (or that can be accurately forecast to arise); and any other factors that may have a bearing on future growth (including possible implications arising from the EU referendum result). It also includes an analysis of any updated growth forecasts from recognised agencies and data sources, including Welsh Government and UK Government Departments.
- The Plan seeks to promote the expansion of established businesses in the countryside. The Council is supportive of minor amendments that could potentially clarify the facilitation of diversification in the rural economy. Such an amendment would not however affect the soundness of the Plan.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amend relevant SDA Policies to provide clarification of employment site names and indications of the delivery of jobs and/or development floor areas within relevant strategic sites.

11. RETAILING

SUPPORT

- NRW and several others support the approach to retail development

OBJECTION ISSUES

- Concern that Parc Tawe has been categorised as an out-of-centre retail park and is not identified as part of the main retail centre
- Request that Policy RC 2 and supporting text be amended to more clearly explain that the sequential approach accords with PPW and clarify when the retail need test will be required
- Suggested conflict between Policies RC 7 and RC 2. Policy RC 7 supports retail development in retail parks, whereas Policy RC 2 includes retail parks as part of the retail hierarchy only supporting such development if no suitable sites within the centres are available
- Concern that Policy RC 7 allows for new A1 retail uses in the retail Parks (albeit restricted to bulky goods) as this could result in further expansion of the retail parks to the detriment of existing traditional centres

COUNCIL RESPONSE

- The evidence base is clear that the designated retail centre within Swansea's Central Area must be a cohesive, concentration of primary shopping streets linked to the existing Quadrant 'Mall'. Parc Tawe does not fulfil the necessary criteria to be classified as such and is more appropriately classified as a complementary retail and leisure destination, in recognition of its functional and locational characteristics

- The Policy reflects national guidance on the need for a sequential approach for retail and leisure development and assessment of retail need. The Council would support minor clarifications or refinements that would confirm how such tests should be applied
- Policy RC 7 relates specifically to the provision of retailing for goods that are not typically sold in centres, predominantly bulky goods. It is considered that this policy compliments the retail hierarchy approach set out in Policy RC 2. A restriction placed against all forms of development at retail parks would not be appropriate

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- An amendment to Policy RC2 to confirm that the test of need will always apply to the consideration of edge of centre sites and retail parks, as per national guidance in PPW, to provide clarity in terms of when such tests should be applied.
- A minor amendment to RC4 and RC 7 to provide clarity and consistency of terminology for 'bulky goods/goods not typically sold on the high street'.
- An amendment to Policy RC 4 to include a specific reference to the regeneration opportunity for the LC car park site, for completeness.

12. GREEN BELT AND GREEN WEDGES

SUPPORT

- Gower Society, Nathaniel Litchfield and partners, Anthony Hurley

OBJECTION ISSUES

Green Belt

- Green Belt Designation: WG, HBF and others consider this designation to be inappropriate. WG has suggested that a Green Wedge designation may be more appropriate

Green Wedges

- Reduction in Green Wedges: objection has been raised to the reduction in the number and extent of Green Wedges. Specific objection has been raised to the loss of Green Wedge at Pantlassau
- Green Wedge designations: Objections have been raised to Green Wedge designations at Birchgrove and Glais
- Cross boundary alignment of Green Wedge areas: Neath Port Talbot has concern that the Green Wedge areas do not align with those in the Neath Port Talbot LDP
- A number of site alternative representations received are also supported by corresponding requests to remove the green wedge designation from the land proposed for allocation.

COUNCIL RESPONSE

- Green Belt is needed in order to strategically manage the urban form for the long term. The Council consider that the Green Belt designation should remain. The proposed Green Belt is located in an area where several strategic development areas are proposed and in order to maintain

these new settlements as self-sufficient and sustainable it is essential to keep them as discrete and distinct settlements. This will be achieved by maintaining the openness of the existing countryside between the new settlements for the long term. Such protection with a degree of permanence can only be achieved through a Green Belt designation. The Plan is considered sound and no amendment is necessary

- The Plan preparation process has involved a review of Green Wedge boundaries to allow for necessary development. This is in line with National Planning Guidance (PPW paragraph 4.8.1). Furthermore as required by National Planning Guidance (PPW 4.8.12) the Green Wedge designations have been reviewed to only include land that is strictly necessary to fulfil the purposes of the policy that is to prevent coalescence. At Pantlassau, the countryside north extends into open countryside and is not at risk of coalescence, therefore it has been judged that a Green Wedge is no longer appropriate. The process is set out in the Swansea LDP Assessment for Green Belt and Wedge Designations 2016
- The review of Green Wedge designations identified land needed to prevent coalescence. This included locations at Birchgrove and Glais. Green Wedge designations in the Swansea LDP only include land that is strictly necessary to fulfil the purposes of the policy, which is to prevent coalescence. This is in line with national guidance (PPW para 4.8.12)
- The Swansea LDP Assessment for Green Belt and Wedge Designations stage 1 eliminated Crymlyn Bog SAC from any Green Wedge designation because it already benefits from significant environmental designation (Table 1 and UDP Green Wedge areas table 6 of this assessment refer). To continue the Neath Port Talbot Green Wedge designation across the administrative boundary would involve designating Crymlyn Bog as Green Wedge contrary to the findings of the assessment

- Along the administrative boundary at Birchgrove the Swansea LDP Assessment for Green Belt and Green Wedge Designations concluded that the land to the north extends into the open countryside and there is considered to be no risk of coalescence with Skewen (Neath Port Talbot) (UDP Green Wedge areas table 4 refers)
- For the above reasons the Council does not support the extension of the Neath Port Talbot Green Wedge into the County at Crymlyn Bog or Birchgrove.
- A review of Green Wedge designations is not necessary, as the Council has not identified a need to seek the allocation of further sites over and above those identified in the Deposit LDP.

13. PROTECTION OF BUILT AND NATURAL ENVIRONMENT

SUPPORT

- Gower Society, Swansea Community Boat Trust, NRW, Swansea Civic Society, GGAT, Welsh Historic Gardens Trust, Nick Lansdowne and Mary and Dave Attwell

OBJECTION ISSUES

- The policy on Historic landscapes, Parks and Gardens: should make it clearer that it covers historic landscapes, parks and gardens
- Whilst unlisted locally important buildings deserve an element of protection they should not be afforded the same level of protection as listed buildings
- *NRW suggest additional information for the policy on Ecosystems including The Importance of 'Providing and enhancing landscape character, historic interest and appreciation' be added to the list of green infrastructure ecosystem services and further examples of green infrastructure be added to the supporting text*
- NRW and Gower Society have recommended that the Policy on the Gower AONB be amended to be more positive and require development to enhance the AONB. Also to make clear that development outside the AONB but with an impact on the AONB should contribute to 'conservation and enhancement' rather than 'not have a detrimental impact to' the natural beauty of the AONB.
- WG object to the Policy requirement to consider the impact on Special Landscape Areas from development proposals outside SLAs. Suggestion that SLA designation conflicts with TAN 8 SSA. WG has concern that the SLA designation at Mawr partly covers a TAN 8 SSA

- Objections to North East Gower and Cockett Valley SLA on the basis the land is most suitable for housing development
- WG consider the Designated Sites Policy to be more restrictive than the Habitat Regulations which allow for imperative reasons of overriding public interest. It is suggested that the policy be amended to bring it in line with the Habitat Regulations
- Request for the undeveloped coast and Geological and Geomorphological Sites of Value to be spatially reflected on the Proposals Map
- NRW suggest that the policy on Impact of Trees puts more emphasis on the positive impact of trees such as through tree recommendations

COUNCIL RESPONSE

- The Council supports an amendment that would clarify the elements protected by policy on historic parks and gardens
- The policy relating to local listed buildings makes clear that these do not have the same status as 'Listed Buildings' by Cadw, and instead provides a mechanism for ensuring the Council protects those buildings that are important for retention but that do not necessarily meet the specific criteria for Cadw listing
- The Council would support minor amendments to the Plan to more fully convey the concept of green infrastructure, more accurately reflect the legislative requirements relating to the AONB
- The need for a SLA at North East Gower and Cockett Valley has been justified through a detailed assessment 'The Special Landscape Areas Assessment 2012'. No change to the SLAs is necessary. The suggested amendment to remove the requirement to consider the impact of development outside SLA's is considered useful in order to more accurately reflect National Planning Guidance

- TAN 8 SSA will override the SLA designation. The SLA identifies areas of local importance and its designation will serve to flag up the areas of local significance when considering wind energy development
- The Council would support minor amendments to Policy ER 6 suggested by WG in order to provide policy clarification
- The identification of the area of undeveloped coast is ongoing as part of a forthcoming seascape assessment and therefore cannot be represented on the Proposals Map. As a matter of clarification there is merit in stating this in the supporting text
- The identification of sites of geological and geomorphological importance is ongoing. As a point of clarification there is merit in adding a statement to this effect to the supporting text
- The need to convey the positive impact of trees within Policy ER 11 is not accepted as this is conveyed in Policy ER 2 Strategic Green Infrastructure Network. Policy ER 11 will be used in conjunction with ER 2.
- A minor amendment to Policy HC 2 supporting text to highlight the requirement for an *Assessment of the Significance of the Importance of Development on Historic Landscape Areas (ASIDHOL)* in certain circumstances.
- Amend Policy HC 2 to ensure that the appropriate level of consideration is given to the register of historic landscapes in Wales and the Policy reflects changes in National Guidance.
- A minor clarification to para 6.2.22/supporting text to HC 2 to confirm that the effect of development on historic assets of special local interest will be assessed on a case-by-case basis.
- A minor amendment to the supporting text to ER 1 to include reference to TAN15 tests.
- An amendment to change or to and in the first sentence of Policy ER2, to ensure that enhancement of the green infrastructure is implemented as part of new development
- Amendments to Policy ER2 to strengthen the policy and ensure that the concept of green infrastructure is clearly expressed in the Plan. Also amendments to the supporting text to provide more key examples to illustrating the concept of green infrastructure to clarify how the policy will be implemented.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Amendments to Policy HC1 and the supporting text to relocating requirement for submission of statements of significance from supporting text to Policy.
- Amend supporting text to HC 1 to clarify the concept of heritage and cultural led regeneration schemes. Include reference to the implementation of this concept at Strategic Site Allocation SD L Tawe Riverside & Hafod Morfa Copperworks.
- A factual update to para 2.6.16/supporting text to HC 1 to refer to 'non-statutory' landscapes and ensure that the Plan accurately reflects the Historic Environment Act (Wales) 2016.
- An amendment to Policy ER 3 to avoid duplication of national planning policy on Green Belt and Green Wedges.
- Minor amendments to Policy ER5 to add the requirement for the management of landscape features to the Policy rather than supporting text and to ensure compatibility with national policy by removing from the policy the requirement to consider the impact on SLAs from development proposals outside SLAs.
- Minor amendments to clarify Policy ER6 and supporting text to
 - Add a caveat in the Policy relating to imperative reasons of overriding public interest to bring the policy in line with Habitat Regulations

- To set out of criteria relating to different types of designated sites rather than relying on national planning guidance
- Clarify the content of the policy by amending the Policy title to reflect all tiers of biodiversity designation
- Minor amendments to strengthen Policy ER7 by bringing the requirement for the consideration of any management plans or schemes for protected areas from the supporting text into to the Policy
- An amendment to Para 2.9.53 to resolve the conflict by amending paragraph. 2.9.53 to indicate that appropriate coastal management schemes are 'likely to be' those listed and add schemes that 'accord with the Shoreline Management Plan' to paragraph. 2.9.54.
- An amendment to the supporting text ER 7 to provide cross references to SPG (The Carmarthen Bay, Gower and Swansea Bay Seascape and Gower Landscape Character Assessments) to assist in identifying the undeveloped coast area.
- An amendment to para 2.9.53 – (supporting text to -ER 7) to clarify that appropriate coastal management schemes are '***likely to be***' those listed and add schemes that '***accord with the Shoreline Management Plan***'.
- An amendment to the supporting text to ER10 to clarify that the identification of sites of geological and geomorphological importance is ongoing.
- Minor amendments, to bring requirements expressed in the supporting text into Policy ER 11, and to refer to the iTree assessment, to strengthen the policy, and ensure that it refers to the most up to date guidance.

14. DEVELOPMENT IN WELSH LANGUAGE SENSITIVE AREAS

SUPPORT

- NRW support Policy HC 3: Development in Welsh Language Sensitive Areas

OBJECTION ISSUES

- Amend Policy to require developments of 25+ dwellings outside WLSA to require a Welsh Language Action Plan
- The LDP should investigate the position of the Welsh language in the areas where new houses are proposed and show the % of Welsh speakers; Welsh cultural activities; and the availability of Welsh medium education and the challenges faced. The Plan fails to address those areas where development of the language is most needed
- All new Primary Schools throughout the County (including the 5 in SD allocations) should be Welsh medium to combat Anglicisation, meet demand and provide "equality of opportunity" to attend a Welsh medium school
- Policy HC 3 will lead to a reduction in the Welsh language and a weakening of Welsh culture
- The Welsh Government and others request that Welsh Language Sensitive Areas (WLSAs) are shown on the Proposals Map
- LDP Policy sets out the same approach as the UDP, yet the scale of development proposed in WLSA's is significantly greater. Lack of clarification on how has the impact on Welsh language been addressed or assessed

COUNCIL RESPONSE

- Amendments to the policy are not considered necessary. The Council considers the Policy to be sound in that it accords with National Planning Guidance by identifying a

Welsh Language Sensitive Area where the language is a significant part of the social fabric of the community, and requiring that proposals in this area prepare a Welsh Language Action Plan which will be subject to conditions or a legal agreement to ensure its implementation

- The requested amendment to include WLSA's on the Proposals Map is considered to have merit as a useful means of strengthening the Policy. The amendment would not however affect the soundness of the Plan
- The Plan is also considered sound in that it is based upon robust evidence. The definition of the Greater North West SHPZ as a Welsh Language Sensitive Area is based upon the evidence contained in the 2001 and 2011 Censuses (which updates the 2013 Culture and Heritage Topic Paper) and a consideration of the potential impact on the Welsh language of development proposed in that Zone
- The Council's Education and Planning departments are working collaboratively to support the provision of sufficient additional schools as part of the local development plan process. In the case of strategic sites, the potential for the provision of a new school building has been assessed in detail. The supply and demand for additional education places in each area is the subject of ongoing assessment. This includes consideration and assessment of language and faith preference. All stakeholders will continue to be engaged/communicated with during the planning and delivery of the QEd2020 strategy, and any proposals will be subject to the statutory consultation process.

NON-SUBSTANTIVE AMENDMENTS PROPOSED

- Minor corrections and updates to references to proportions of Welsh speakers and data sets in the supporting paragraphs to HC 3 Welsh Language, to clarify how the policy relates to the most up to date evidence base, For example, 18% should be 19%. This amendment is

supported by an update to the Cultural Heritage and Welsh Language Topic Paper.

15. LDP CONSULTATION PROCESS

OBJECTION ISSUES

- LDP insufficiently publicised to generate public interest
- Lack of consultation with individual communities
- Previous objections to draft proposals to allocate sites have not been listened to
- Lack of engagement with key stakeholders to gather necessary evidence about site constraints
- The consultation forms are too difficult to fill in and the online facility is difficult to navigate
- Lack of Welsh language translated version of Deposit LDP

COUNCIL RESPONSE

- The LDP has been subject to extensive public consultation and stakeholder engagement throughout its formation, including at pre-Deposit stages such as 'Candidate Sites', Vision and Objectives, and LDP Preferred Strategy consultations. Full details of all consultation exercises and processes followed since the LDP process began in 2010 are set out in the City and County of Swansea LDP Initial Consultation Report - see www.swansea.gov.uk/ldpdeposit
- All previously submitted comments have been assessed as part of the work to formulate the Deposit LDP. Unfortunately in some cases requests from consultees to remove sites have not been actioned where the site is considered by the Council to be on balance appropriate for allocation, which is a decision that must be made in the context of the Council's duty to produce a sound Plan
- The 6 week statutory public consultation on the Deposit LDP utilised a wide range of methods, inclusive of:
 - Site notices placed at all proposed allocated sites to raise awareness and publicise the consultation process

- Permanent display in the Civic Centre main reception area, accompanied by rolling digital display on screens
- Press releases and numerous articles in local media
- Posters and feedback forms made available at all Council libraries
- Website updates and notification e-mails posted at intervals during the consultation period to publicise the consultation to all those on the LDP database, as well as Ward Members and Community Councils
- Various engagement forums with statutory consultees and Members
- 16 community exhibitions and engagement sessions held at venues throughout the County, where officers were on hand to discuss issues raised, each of which typically lasted 3 hours and in total constituted around 50 combined hours of sessions within communities
- Amendments to the website were carried out during the consultation, to better signpost users to the user guide on how to comment online. Furthermore, additional subdivision of topics was done online to improve the user friendliness of commenting on H 1 sites
- Considerable officer time was dedicated to attending queries from consultees in person at reception and over the phone and providing personal and friendly support and guidance on how to engage in the consultation, either online or through email or paper forms. Contact details of the Strategic Planning Team were widely publicised at engagement events, on the website, on the paper forms and in email notifications to the LDP database
- The LDP was produced in accordance with the Welsh Language Standards that applied at the time of consultation