



Report of the Head of Planning and City Regeneration

Special Planning Committee – 22 October 2021

Adoption of Supplementary Planning Guidance: Placemaking Guidance for Residential Development; Placemaking Guidance for Infill and Backland Development; and Placemaking Guidance for Householder Development.

Purpose:	To inform Members of the representations received during the public consultation on draft Placemaking Guidance for various scales of residential development, and highlight officer responses to these, and to seek approval to adopt the amended versions as Supplementary Planning Guidance (SPG).
Policy Framework:	Swansea Local Development Plan (Adopted 2019); Planning and Compulsory Purchase Act 2004; City & County of Swansea Local Development Plan (Adopted February 2019); Well-being of Future Generations (Wales) Act 2015; Planning (Wales) Act 2015; Planning Policy Wales (2018) and related Guidance; Environment (Wales) Act 2016.
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	It is recommended that: <ol style="list-style-type: none">1) The issues raised in the representations made during the consultation process, and the responses of the Planning Authority to these (set out at Appendix A, B and C of this report), be noted;2) The final version of the SPGs (set out at Appendix D, E and F of this report) be approved and adopted by the Council;3) The Head of Planning and City Regeneration, or appropriate delegated officer, be authorised to make any outstanding typographical, grammatical, presentational or factual amendments to the adopted final versions of the SPG prior to its final publication
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1. Introduction

- 1.1 In **February 2021** the Planning Committee resolved to approve draft versions of the Placemaking Guidance for Residential Development, Infill and Backland Development and Householder Development Supplementary Planning Guidance (SPG) for the purpose of public and stakeholder consultation. Subsequently, a comprehensive engagement and consultation process was undertaken, to obtain views on the content of the draft documents. The consultation and engagement process ran for more than the minimum of six weeks from 14th June until the 13th September 2021 and this report presents the comments received, along with the resulting amendments to the final SPG documents.
- 1.2 This Committee Report briefly summarises the background and context to the SPG's preparation. It describes the outcome of consultation process (Appendices A, B and C), and summarises the range of comments received, and the response of the Planning Authority to these comments. It also highlights the specific amendments that have been made to further clarify and refine the SPGs.
- 1.3 The final version of the Placemaking Guidance documents for all scales of Residential Developments are set out in Appendices D, E, and F for Members to formally endorse as SPG to supplement the Swansea Local Development Plan (LDP), and to be used in planning decision making.

2. Background and Context

- 2.1 Full details of the planning policy and legislative background and context to the SPG is provided in the Report of the Head of Planning and City Regeneration to Special Planning Committee dated 9th February 2021 'Approval of Placemaking Guidance for Residential Developments at all scales for consultation'. The key points are summarised below and include subsequent updates to the national policy framework.
- 2.2 The Swansea LDP (available at www.swansea.gov.uk/ldp) was adopted in February 2019 as the Council's statutory development plan. The LDP highlights a wide range of SPG scheduled to be produced to augment LDP policies, which will provide definitions and working examples to assist the interpretation of policy.
- 2.3 The residential focussed SPGs are primarily supplemental to **Policy PS 2: Placemaking and Place Management and Policy SD2: Masterplanning Principles** in the adopted Swansea LDP. They also provide supporting guidance to a wide range of adopted policies:

PS 1:	Sustainable Places
PS 2:	Placemaking and Place Management
SD 1:	Strategic Development Areas
SD 2:	Masterplanning Principles
SD A-L:	Strategic Site Allocations
ER 1:	Climate Change
ER 2:	Strategic Green Infrastructure Network
ER 4:	Gower AONB of Outstanding Natural Beauty (AONB)

ER 6: Designated Sites of Ecological Importance
ER 8: Habitats and Species
ER 9: Ecological Networks & Features of Importance for Biodiversity
ER 11: Trees, Hedgerows and Development
H 8: Ancillary Residential Accommodation
CV 4: Conversion of Rural Buildings
HC 2: Preservation or Enhancement of Buildings and Features
EU 2: Renewable & Low Carbon Energy in New Development
RP 1: Safeguarding Public Health and Natural Resource
RP 3: Air and Light Pollution
RP 4: Water Pollution and the Protection of Water Resources
RP 10: Waste in new development
SI 1: Health and Well-Being
SI 8: Community Safety
T 8: Parking

2.4 The new SPGs comprise comprehensive updates of existing documents, which incorporate learning from six years of use and are now fully aligned to the current legislation, policy and best practice at the national and local level in relation to residential development at all scales:

- Householder Development – typically extending or altering an existing home
- Infill and Backland Development – typically a small site of around 10 homes either as a gap in an existing street frontage or a larger area behind existing buildings
- Residential Development – typically major developments (classified as 10 or more homes) right up to the strategic sites allocated in the LDP for many 100s of homes.

2.5 The SPG's provide applicants with the detail necessary to understand how the Council will implement the LDP's Policies relating to placemaking of residential developments, in alignment with recent changes to legislation and policy requirements¹ which together require the Council to achieve clearly defined well-being and environmental goals and objectives.

2.6 The SPGs are underpinned by a 'Placemaking approach', as advocated by the Swansea LDP and Planning Policy Wales. Placemaking is a holistic approach to planning and is the cornerstone of the Planning Authority's decision making process. It is a concept focussed on positive outcomes that considers social, economic, environmental and cultural values of development proposals, as well as the potential of an area to create development that promotes prosperity, health, and well-being. There is increasing evidence of the physical and mental wellbeing benefits to people that well designed places can provide. Swansea has significant growth pressures, and it is imperative to positively shape new places in a proactive manner supported by the updated SPGs.

2.7 The Welsh Government have emphasised in 'Building Better Places' - published in July 2020 that Placemaking should be at the heart of post Covid-19 recovery, emphasising that the places created and shaped

¹ National Planning Guidance [PPW and Technical Advice Note (TAN) 12 'Design'], the Planning Act Wales 2015, the Environment Act (Wales) 2016, and the Well-being of Future Generations (Wales) Act 2015, Future Wales: the National Plan 2040.

through the planning process are critical to future prosperity, identity and well-being. It states:

“Now, more than ever, we need to think about places and placemaking. This will be our core value in the work we take forward to bring about recovery in Wales. The regenerative action we take at all levels will be driven by integrated thinking and not short-term expedience which can have negative longer term consequences.”

3. Public Consultation and Engagement

3.1 In February 2021 the draft Design Placemaking Guidance for Residential Developments, Infill and Backland Developments and Householder Developments was presented to Planning Committee. Members resolved to endorse the draft document to be issued for public and stakeholder consultation.

3.2 The draft SPGs were subject to a consultation and engagement process for approximately 12 weeks, from the 14th June and until the 13th September 2021.

3.3 The consultation involved a wide range of awareness raising and engagement activities, including:

- Social media postings notices before and during the consultation
- A specific page was created for the consultation on the Council Web Site, providing a weblink to the draft documents, non-technical summaries and a link to the comment form
- Notification emails were sent to a range of stakeholders, including Councillors
- Remote briefings to stakeholder groups via Microsoft Teams presentations
- Publication of recorded video presentations on the Council’s website
- Following the lifting of all Covid restrictions, it was possible to attend two Summer of Play events in Trallwyn and Gorseinon.

3.4 A range of other bespoke and targeted engagement exercises with the public and stakeholders included:

- Conversations with over 25 children and their families at two play sessions in different parts of Swansea
- Webinar with 17 attendees (representing Housing Associations, Volume House Builders, Regional House Builders and Police) including question and answer sessions - The recorded webinars were watched a total of 46 times
- Targeted communications with the development industry – giving rise to 13 written representations (representing Housing Associations, Volume House Builders, Regional House Builders, planning agents, designers and public organisations) which have been broken down into over 90 separate comments.

4. Key Issues Arising from the Consultation

- 4.1 The public and stakeholder consultation generated a range of representations from children/ young people, individuals and organisations, representing both environmental and development industry sectors relating to all parts of the SPGs.
- 4.2 The Consultation Reports for each of the Placemaking Guidance documents (set out in Appendices A, B and C of the Committee Report) set out the record of comments received, categorised into issues/themes, together with the Council's corresponding response. Any necessary amendments to the draft SPG document are also reported.
- 4.3 The main issues raised and changes resulting are set out below grouped under key themes for each of the Placemaking Guides.

Placemaking Guidance for Residential Developments

- 4.4 In total some 90 comments were received on this draft document. The amendments are summarised below and detailed in Appendix A.
- 4.5 **Broad support for the placemaking approach** (raised at webinar and written responses). Placemaking and Green Infrastructure are a cornerstone of national policy and the document demonstrates how this can be applied to new places to live.
- 4.6 **Length of document** (from written responses). The document is comprehensive and well-illustrated. It stretches to just over 100 pages but is designed to be accessible for specific modules/ issues rather than being read from cover to cover. Therefore, whilst is no proposal to significantly reduce the length of the main document (although all opportunities have/are being taken to simplify and rationalise the text), a short 15 page non-technical summary has been prepared.
- 4.7 **Flexible application of guidance** (from written responses). There was a view from a number of respondents that the Placemaking Guidance are 'rules' that are inflexible. All SPG expands on the Policies of the LDP, it is therefore guidance that is applied flexibly to sites. This does not mean that it can be disregarded, rather that the principles of the SPG can be tailored to the specific constraints and opportunities of a site/ location. The positive use of the existing SPGs can be seen in the numerous schemes that have been negotiated and approved to date. The commentary on flexible application of the guidance was in the document and this has been restated in the introductory section.
- 4.8 **Emphasis that Swansea has many successful places to live** (from written responses). The Placemaking approach is not about reinventing the wheel but to learn from existing successful places. There are many existing successful places in Swansea such as Uplands, Mumbles, Morriston and Gower Villages. The document has been amended to indicate that existing local places can form good precedents to learn from.

- 4.9 **New homes should be close to schools, shops, parks and nature** (from conversations with families and children at the play sessions). This was a strong message from children and their parents/ carers about the benefits of being able to walk to community facilities with benefits for health, well-being and sense of community. This aligns with the national emphasis on active travel and there was a clear view that having to drive everywhere was not a good thing. The document sets out these requirements and this is a positive endorsement of this approach.
- 4.10 **Clarity on Walkable Neighbourhoods** (from written responses). There was a lack of clarity on the distances in the document underpinning the walkable neighbourhood concept and this has been clarified to 15minutes or 1200m.
- 4.11 **Emphasis on retaining existing good trees** (from written responses). The draft document emphasised retained existing trees where possible but there is an opportunity to highlight the Tree and Hedgerow SPG which expects that all category A and B trees are retained and also sets out the Tree Replacement Standard.
- 4.12 **Placemaking and Green Infrastructure requirements have implications for viability/ housing delivery** (from written responses). These are national requirements and an agenda that is robustly set out in PPW, as well as the Swansea LDP. Rather than prescriptive requirements, approaches to placemaking and GI are able to be adapted to all scales of site in differing locations according to the principles set out. The placemaking approach is acknowledged to provide long term well-being and health benefits and the PPW supplement is clear that planning must look beyond the short term challenges of delivery. The Council also advocated an open book transparent approach to viability to understand and test project costs. The transparent approach to viability has been added to the document.
- 4.13 **Application of density targets** (from written responses). The responses on this aspect ranged from the density target being too high, too low and needs to be flexible! LDP policy SD 2: Masterplanning Principles sets a density target for 35 dwellings per hectare in relation of schemes of 100+ homes. Current negotiations prove that this density target is appropriate but requires developers to include a range of housing types/ sizes which is beneficial for mixed, cohesive communities. The comment was also made that higher densities should be encouraged in town/ city centres and accessible locations which is currently the case in the document. It was also pointed out that city centre density could also be increased by low-rise blocks, not just tall buildings. These comments have been addressed by a feature page focussing on the Urban Quarter development on Swansea High Street as a good example of high density, low-rise homes as part of a mixed use development. Plus clarity has been added to explain where higher densities are expected and how these should be achieved whilst avoiding cramped places or overdevelopment.
- 4.14 **Clarity on requirements for active frontages and legible entrances in mixed use buildings** (from written responses). It was commented that the document focussed on suburban schemes and lacked guidance for mixed use developments in town and city locations where homes may be on upper floors above active commercial frontages. This comment has been

taken on board and additional clarification added to ensure active frontages and legible entrances.

- 4.15 **Challenges in integrating Sustainable Urban Drainage** (raised at webinar and written responses). The SUDs requirements are set nationally by separate legislation. This is a requirement for all developments of more than 100sqm so will apply to all major developments. The Green Infrastructure module suggests how SUDs features can be integrated into new residential developments. It is recognised that this could affect densities and viability, and this is being positively addressed in negotiations of current schemes to transfer learning between projects.
- 4.16 **New streets should have trees and greenery and not be full of cars** (from conversations with families and children at the play sessions). This was a strong message from children and their parents/ carers which aligns with the national emphasis on green infrastructure and for designing streets as places not dominated by vehicles. The document sets out these requirements and this is a positive endorsement of this approach.
- 4.17 **Linkage between place-led street design and highway adoption** (raised at webinar and written responses). This came up as strong and widespread comments in the consultation. It is a national planning requirement to ensure slow speed place led streets and the Supplement to Planning Policy Wales, Building Better Places (p17) states "*Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets*". The 'Streets as Places' module in the document has been subject to positive inputs from Highway Colleagues and the approach of agreeing place-led streets that are green, slow speed, safe and accessible has been implemented on a number of sites. The emerging Street Design Guide which sits alongside the Placemaking Guidance will ensure that schemes agreed at the planning stage are accepted for adoption and constructed as per the original vision.
- 4.18 **New homes should have larger windows and be colourful** (from conversations with children and families at the play sessions). This was a strong message from the adults of the future of how they thought new homes should be designed to live in. Larger windows for natural light and connection to the outdoors are key aspects contributing to well-being. Colour is also important for a sense of variety and personalisation. The document sets out these requirements and this is a positive endorsement of this approach.
- 4.19 **Homes will look different with sustainable living and low carbon technologies** (from written responses). Our homes will increasingly look different to conserve energy, generate energy and utilise low carbon sustainable materials. This means that the emphasis on responding to context will need to be balanced with future living and the document has been amended to emphasise this point.
- 4.20 **Concern at new requirement for uplift areas** (from written responses). This is a new addition to the updated document and reflects experiences

of negotiating many schemes creating new places. Experience has proven that uplifted treatments are necessary, especially on larger developments and can be agreed with developers for key frontages. This is important to create a quality place and townscape. The draft guidance proposed that this approach be applied to sites of 50 or more homes with a requirement that at least 20% are uplifted. The concerns centred around costs, viability and the justification for the 20% requirement. Whilst these concerns are noted it is considered that this requirement is valid to require uplift treatments in developments of 50 or more homes but the 20% requirement has been removed to allow flexibility across differing sites/ locations.

- 4.21 **Ensure full integration with Secure by Design** (raised at webinar and written responses). There is a community safety module in the document and a number of minor amendments have been made to strengthen the Secure by Design requirements without conflicting with placemaking objectives.
- 4.22 **Concern at the implications of space standards** (raised at webinar and written responses). This was raised as a significant issue by a number of respondents. The concerns included affordability for purchasers, site density, overall viability and whether space standards should be in a SPG document. It is not considered appropriate to remove the space standards from the SPG nor to substitute a vague reference to avoiding unacceptably small homes which is not helpful to developers or decision makers. In response, the space standard table has been moved to an appendix (which includes both UK defined standards and new Welsh requirements for affordable homes), and the corresponding paragraphs amended to indicate that the standards will be a consideration in assessing proposals. Where developments have homes below the space standards the Design and Access Statement could be used to explain and justify this. A clear reference has been retained to indicate overly small homes will not be accepted which primarily relates to conversion proposals in town and city centre locations.
- 4.23 **Implications of access for all requirements** (from written responses). This section has not changed from the 2014 document. The concerns focus on the perceived requirement for Lifetime Homes and the requirements for specific accessibility provisions for all homes. As noted in relation to the concerns about inflexible application of the SPG, the document is guidance. It however noted that access within buildings/ homes is addressed via the Building Regulations so the text in this section has been amended to explain that accessibility needs vary, and the text explains how this could be applied to new homes but is not an essential requirement.
- 4.24 **Concern at new requirement for 25% of homes should have gardens large enough for extensions/ home offices** (from written responses). This is a new addition to the updated document and reflects Development Manage experience of reviewing completed housing developments where the size of gardens often restricts homeowners from ever extending or adding a garden room. This can result in less cohesive communities as owners move on rather than extending their homes. The concerns expressed were that this could affect affordability, density and viability. Whilst these concerns are noted it is considered that this requirement is

valid but the 25% requirement has been removed to allow flexibility in application and any issues of viability can be addressed through the open book Development Viability Model process.

- 4.25 **Clarification on why the 15m back to side separation distance is required** (from written responses). This separation distance is required to ensure the garden and rear elevation of a house with another at right angles to the rear does not suffer issues of overbearing or overshadowing. It is not appropriate to reduce this distance as oppressive relationships will result, so no change has been made for this aspect.

Placemaking Guidance for Infill Developments

- 4.26 A number of the comments on the Placemaking Guidance for Residential Developments were also relevant to this draft document. The relevant comments are summarised below and detailed in Appendix B.

- 4.27 **New streets should have trees and greenery and not be full of cars** (from conversations with families and children at the play sessions). This was a strong message from children and their parents/ carers which aligns with the national emphasis on green infrastructure and for designing streets as places not dominated by vehicles. **Linkage between place-led street design and highway adoption** (raised at webinar and written responses). This came up as strong and widespread comments in the consultation. It is a national planning requirement to ensure slow speed place led streets and the Supplement to Planning Policy Wales, Building Better Places (p17) states “*Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets*”. There was guidance on access and parking but nothing in relation to the design of new streets. The nature of these smaller sites especially backland sites means that new short slow speed streets will be created and these should not be overly engineered and dominated by cars. Therefore a new section has been added to reflect the national emphasis on place-led streets.

- 4.28 Other comments duplicating those in relation to the Placemaking Guidance for Residential Developments were as follows:

- Flexible application of guidance
- Emphasis that Swansea has many successful places to live
- Placemaking and Green Infrastructure requirements have implications for viability/ housing delivery
- Application of density targets
- Homes will look different with sustainable living and low carbon technologies
- Linkage between place-led street design and highway adoption
- Challenges in integrating Sustainable Urban Drainage
- New homes should have larger windows and be colourful
- Emphasis on retaining existing good trees

Placemaking Guidance for Householder Developments

- 4.29 A number of the comments on the Placemaking Guidance for Residential Developments were also relevant to this draft document. The relevant comments are summarised below. The amendments are as per the paragraphs above and detailed in Appendix C.
- Emphasis that Swansea has many successful places to live
 - Challenges in integrating Sustainable Urban Drainage
 - Homes will look different with sustainable living and low carbon technologies
 - Emphasis on retaining existing good trees
- 4.30 The Planning Authority has provided a response to all the duly made consultation representations. A full schedule of these responses is set out in Appendices A, B and C.
- 4.31 **Comments not requiring amendments:** A large number of the comments made did not necessitate an amendment to the draft document as it was considered the LDP and/or SPG already sufficiently covered the points raised. Some comments made in support of the SPG did not require a response other than to note and welcome the representation made. Some suggestions put forward conflicted with the adopted LDP or national guidance, or requested repetition of national guidance, neither of which are appropriate. A number of comments were queries that required an answer (which has been provided in the consultation reports) but did not require a change to the SPG.
- 4.32 **Comments on viability:** Comments were received which highlighted concerns about the potential impact of the SPG on development viability and subsequent affordability of housing. The Council's response as set out above and draws attention to the fact that the SPG does not itself introduce new requirements. Rather, the SPG provides guidance on how the Council will implement requirements already set out in national legislation & guidance and in the Council's Adopted LDP.
- 4.33 **Comments requiring factual updates:** A number of comments did highlight the need for the draft SPG to be amended in order to: provide factual updates; additional cross references to relevant existing information; and improve the grammatical structure of the document. Specific changes have been made in order to provide more clarity in respect of:
- Including reference to Welsh Government Publication 'Building Better Places: Planning and the Covid-19 Recovery'
 - Clarifying Sustainable Urban Drainage requirements set by other legislation
 - Reference to emerging Street Design Guide
 - Amendment of references throughout the SPG and Appendices to reflect the publication of Future Wales 2040, and updated PPW 12.
- 4.34 Prior to final publication some minor factual, grammatical and formatting changes to the document may be necessary, and some photographs may need to be altered.

5. **Monitoring**

- 5.1 The effectiveness and appropriateness of the SPG will be regularly monitored by the LPA having regard to the outcomes that arise. This monitoring will consider any additional evidence arising over time, such as new national guidance and future outcomes of planning decisions that reference the SPG (including planning appeals). This will be particularly important where such outcomes demonstrate that a particular change to the guidance is necessary for the LPA to continue to use the SPG to provide effective, evidenced based and sustainable decision making

6. **Integrated Assessment Implications**

- 6.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage
- Consider opportunities for people to use the Welsh language
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

- 6.2 The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

- 6.3 An Integrated Impact Assessment (IIA) process has been undertaken to ensure due regard has been had to the above. This process takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

- 6.4 An Integrated Impact Assessment (IIA) screening was carried out prior to the July 2021 consultation. The IIA demonstrated that a full IIA was not necessary, because the SPG seeks to facilitate community cohesion by assisting the implementation of relevant LDP Policies, which themselves have already been subject to EIA, are based on a comprehensive and up to date evidence base, found sound by the Planning Inspectorate. The IIA was an update of the EIA carried out in 2020 on the previous version of the SPG which identified mostly low impacts. The results of this screening is set out in Appendix G.

7. Financial Implications

- 7.1 There are no significant financial implications arising from the publication of this SPG. The cost of the public consultation process and document production has been accommodated within existing budgets and staff resources, and has utilised, as far as possible, electronic communication (email and website).
- 7.2 The final adopted document will be made available electronically and hard copies will generally only be produced upon request for an appropriate charge in order to recoup costs incurred. As such printing costs going forward will not be significant and can be met within allocated budgets.

8. Legal Implications

- 8.1 The SPG will provide planning guidance to the adopted Swansea LDP and will be a material consideration in evaluating future planning applications.
- 8.2 The adopted SPG will supersede the following SPG which will no longer remain extant:
- Places to Live – Residential Design Guide
 - Infill and Backland Developments - Design Guide
 - A Design Guide for Householder Development
- 8.3 The Council has a duty to seek to continually improve in the exercise of its functions (which include where appropriate powers) in terms of strategic effectiveness, service quality and availability, sustainability, efficiency and innovation pursuant to the Local Government (Wales) Measure 2009.

Background Papers:

Report of the Head of Planning and City Regeneration to Special Planning Committee: Approval of Placemaking Guidance for Residential Developments at all scales for consultation - February 2021

Appendices:

The following appendices are set out at <https://www.swansea.gov.uk/spg> (click to follow link).

Appendix A	Consultation Report - Placemaking Guidance for Residential Development
Appendix B	Consultation Report - Placemaking Guidance for Infill and Backland Development
Appendix C	Consultation Report - Placemaking Guidance for Householder Development
Appendix D	Placemaking Guidance for Residential Development SPG
Appendix E	Placemaking Guidance for Infill and Backland Development SPG
Appendix F	Placemaking Guidance for Householder Development SPG
Appendix G	Integrated Assessment Implications Screening Form