Appendix B

# Swansea Local Development Plan Review Report July 2023



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## **Executive Summary**

#### **Purpose of this Review Report**

- The Swansea Local Development Plan (LDP) was adopted by the Council on 28<sup>th</sup> February 2019. The LDP sets out the Council's planning framework for the development and use of land within the county boundary for the period up to January 1<sup>st</sup> 2026.
- 2. Local Planning Authorities (LPA) have a statutory duty to keep their development plans up to date and to undertake a formal review of the LDP at the required time. The Council's Third Annual Monitoring Report (AMR 3), covering the period 2021-22, highlights that national legislation<sup>1</sup> requires the Council to undertake a comprehensive review of the Swansea LDP no longer than 4 years from the date of its adoption. This is in order to ensure the LDP, and its supporting evidence, is up to date and continues to provide a sound basis for planning decisions. Given the Swansea LDP was adopted in February 2019, the statutory requirement to commence a review of the Swansea LDP is by February 2023 at the latest.

- 3. AMR 3 indicated that some of the monitoring indicators relating to policies of the Swansea LDP are under performing, and that the statutory 4 year LDP review provides an opportunity to address these areas. Key strategic planning issues in this respect are those relating to the delivery of new housing on some LDP allocations, and the delivery of new pitches required to meet the accommodation needs of Gypsies and Travellers.
- 4. Having regard to the findings set out in the AMR regarding certain monitoring indicators, and the impending need for the statutory LDP review process to be underway on the Swansea LDP by February 2023 in any event, the recommendation of AMR 3 was that a LDP Review Report should be prepared in-line with the process prescribed by Welsh Government guidance and legislation.
- 5. The primary functions of a Review Report are to determine the appropriate procedural route for replacement Plan preparation, and to identify key issues to be considered when taking the LDP process forward.

<sup>&</sup>lt;sup>1</sup> Required by the Planning and Compulsory Purchase Act 2004 (Section 69(1)) and LDP Regulation 41(1)

#### **Revision procedure for replacement Swansea LDP**

- 6. Fundamentally there are two revision routes available to choose from when considering how to produce a replacement LDP, which are:
  - Undertake a 'Full Revision' process, following the same procedures as used in preparing the current adopted LDP; or
  - Undertake a 'Short Form Revision' (SFR) procedure, where the parameters to be considered are very much more focussed and limited in scope.
- 7. SFR procedures are only appropriate where the parameters to be considered are very focussed and limited in scope, and where these do not go to the heart of a Plan. For example a SFR procedure does not apply in the case of review of the scale and distribution of growth. In addition, and crucially, the SFR excludes the requirement to undertake pre-deposit public consultation on revised proposals. Consultation and engagement on key strategic planning issues, such as growth requirements, is an important element of Plan formation process and should not be foregone without clear justification.
- 8. This Report highlights that, whilst much of the Swansea LDP is operating well, there is a clear need to update the

evidence base of the Plan. This is due to the timescale elapsed since LDP adoption, but more importantly the significant material changes in the strategic planning and societal contexts that have arisen during this period. This includes a need to review the scale of population growth going forward in the light of emerging data, which could in turn require a change to the scale of the housing and employment growth strategy for Swansea. Furthermore, while the existing spatial strategy is considered to be sound, the way in which it is delivered will need to be reviewed against significant material changes since the Plan's adoption. This includes the relevant policies and parameters set out in Future Wales - the National Development Plan published post LDP adoption.

This report also highlights there is a need to consider 9. whether the findings of the latest AMR, in respect of delays incurred on delivering certain LDP allocated sites, necessitate the identification of any new allocations to deliver any updated housing requirement. This would require a detailed review of undelivered existing allocations and the individual merits and deliverability of other allocations. The need for such a process reflects the requirements of PPW (ed11), which states there must be sufficient sites suitable for the full range of housing types to address the identified needs of communities. This necessitates an update to the evidence of housing needs. An important part of ensuring a sufficient range of sustainable and deliverable sites are available, is providing an opportunity for all

sectors and types of house-builder to contribute to delivering the housing requirement, including nationals, regionals, Small and Medium-sized Enterprises (SMEs), registered social landlords (RSLs), and the custom and self-build sector.

- 10. Based on the review of the adopted Swansea LDP undertaken for this Report, and the conclusions set out at the end of each chapter of the Report, it is clear that the Full Revision procedure would be the most appropriate form of revision process for the Swansea LDP. This would mean that a Replacement Swansea LDP would be prepared from 2023, following the same full procedures as used in preparing the current adopted LDP. Preparation of a Replacement LDP will ensure that effective local decision making in planning can continue, in-line with the plan-led approach in Wales required by Welsh Government.
- 11. In summary, this Review Report concludes it is necessary for a Full Review procedure to be undertaken for the Swansea LDP, to enable the LPA to respond to the strategic issues and key policy matters raised in this Report, and to fully update the evidence base on which the LDP is based.

#### Changes to Background Evidence and Context

12. Various elements of the LDP evidence base are highlighted in this report as necessary to be updated.

The report highlights that any changes to this evidence may need to be reflected in amendments to current LDP policies, including with regard to: the need for, and provision of, pitches for Gypsies and Travellers; affordable housing need; high level financial viability of delivering affordable housing and physical infrastructure requirements in the different parts of the County; retail need and provision; transport infrastructure impacts of allocations; the potential need for provision of areas for mineral extraction; and to reflect new national guidance expected on flood risk. This list is not intended to be exhaustive.

- 13. Changes in national, regional and local policy and circumstances will need to be reflected. As well as Future Wales this includes the new regional planning agendas, the emerging proposals of the SW Wales Metro, and the latest Local Wellbeing Plan context.
- 14. This report has also identified that opportunities can be taken to update policies that, although largely working effectively based on the AMR, could benefit from wording changes in order to refine the Plan. This report highlights such instances but does not detail every opportunity and the LPA will continue to review and refine through the Replacement LDP process building on evidence gained from experience of using the policies since Plan adoption.

15. It should be noted that this Review Report is not intended to detail the changes that will be made to the LDP as these will only be determined through the formal preparation process of the Replacement LDP.

#### Joint LPA Working Opportunities.

- 16. WG Guidance<sup>2</sup> states that, for LDP reviews, LPAs should consider and demonstrate they have exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base. Collaboration is a requirement of the Well-being of Future Generations Act and an integral part of the LDP soundness tests (i.e. Does the Plan Fit Is it compatible with the plans of neighbouring authorities?).
- 17. The LPA has explored the options for working jointly with other LPAs on the Development Plan, but due to the significant differences that exist with adjoining Authorities in terms of producing their Replacement LDP timelines, it is concluded that the most appropriate option at this time is for the Council to undertake the Swansea LDP review on an individual LPA basis.

Notwithstanding this, wherever possible, the LPA will continue to work collaboratively with other neighbouring LPAs on producing a consistent and coherent evidence base across the region (notable elements of joint work have already commenced on some key evidence studies) and work with other LPAs in the future to prepare a Strategic Development Plan (SDP).

#### Consulting on the Draft Review Report

- 18. Stakeholders have made a valuable contribution in helping to identify and clarify what issues need to be considered in the Replacement LDP, how effective the existing LDP has been in terms of delivery and the extent of likely changes required. Consultation on the draft Review Report has been undertaken with specific and general consultation bodies as recommended in the WG Guidance<sup>3</sup> while also making it available more widely for comments from the general public.
- 19. The LPA has reviewed the consultation responses received and considered the potential implications for both the content of the LDP and the proposed review procedure and any appropriate amendments have been made in the final Review Report. The final Report will be recommended to Council Members to approve for submission to Welsh Government, which will then confirm the form and type of review route that will be followed in preparing the Replacement LDP.
- 20. The final Review Report will be a key part of the evidence base underpinning the form and content of the Replacement LDP and ultimately will be one of the

<sup>&</sup>lt;sup>2</sup> Development Plans Manual Edition 3. Welsh Government (2020)

<sup>&</sup>lt;sup>3</sup> Development Plans Manual Edition 3. Welsh Government (2020)

documents that will be submitted to the Inspector for examination.

## **Chapter 1. Introduction and Background**

## 1.1 Background

- 1.1.1 The Swansea Local Development Plan (LDP) was adopted by the Council on 28th February 2019. The LDP sets out the Council's planning framework for the development and use of land within the county boundary for the period up to January 1st 2026.
- 1.1.2. Local Planning Authorities (LPA) have a statutory duty to keep their development plans up to date and to undertake a formal review of the LDP at the required interval. The Council's Third Annual Monitoring Report (AMR 3), covering the period 2021-22, highlighted that national legislation<sup>4</sup> requires the Council to undertake a comprehensive review of the Swansea LDP no longer than 4 years from the date of its adoption. This is in order to ensure the LDP, and its supporting evidence, is up to date and continues to provide a sound basis for planning decisions. Given the Swansea LDP was adopted in February 2019, the statutory requirement to commence a review of the Swansea LDP is by February 2023 at the latest.

## 1.2 Purpose of this Report

- 1.2.1 LPAs that are undertaking a review of their adopted LDP are required to submit a Review Report of their findings to Welsh Government within six months of commencing the review process. This document provides a draft Review Report based on the review of the adopted Swansea LDP, to be subject to stakeholder and public engagement that will inform a final version to be submitted to Welsh Government.
- 1.2.2 The primary functions of a Review Report are to determine the appropriate procedural route and identify key issues to be considered when taking the existing LDP forward.
- 1.2.3 There are two revision routes available to choose from when considering how to revise an LDP. Firstly there is a Full Revision of the Plan which follows the same full procedures as were used in preparing the adopted LDP. The alternative option is a Short Form Revision (SFR) procedure where the parameters to be considered are very much more focused and limited in

<sup>&</sup>lt;sup>4</sup> Required by the Planning and Compulsory Purchase Act 2004 (Section 69(1)) and LDP Regulation 41(1)

scope. Welsh Government guidance<sup>5</sup> states that the SFR procedure should only be considered if the Review Report conclusions do not:

- Result in the existing strategy to be considered unsound or indicate changes to the strategy or any part of it are required
- Result in a plan, or parts of the plan, becoming distinctively different to the adopted plan
- Propose changes that are of a significant scope, number and scale
- 1.2.4 In particular it is noted that the Guidance states that through the SFR procedure, the strategy in the adopted LDP clearly remains appropriate when moving forward, in essence it is 'sound'. Based on this premise, i.e. that the strategy remains valid, the SFR procedure specifically excludes Regulation 15 and the requirement to undertake pre-deposit public consultation on the scale and distribution of growth. **Fundamentally therefore, any potential changes to the scale or distribution of growth are likely to preclude the SFR procedure.**
- 1.2.5 In-line with WG Guidance<sup>6</sup> this Review Report provides a report on the review and sets out the following:

- What information has been considered to inform plan review and why
- How the findings impact on the vision, aims, objectives, and strategy implementation
- A review of each plan topic area clearly identifying what needs to change and which parts of the evidence base require updating to support the changes
- The implications for those parts of the plan not proposed to be amended in terms of coherence and effectiveness of the plan as a whole
- A reconsideration of the SA/SEA and HRA
- Opportunities to prepare Joint LDPs/Joint LDPLites with neighbouring LPAs and for cross-boundary working; and
- Conclusions on why the full, or short form review procedure is to be followed.
- 1.2.6 It should be noted that this Review Report is not intended to detail all the changes that will be made to the Swansea LDP, as these will only be determined through the formal preparation process for the Replacement LDP.

<sup>&</sup>lt;sup>5</sup> Development Plans manual Edition 3, Welsh Government (2020)

## **1.3 Structure of this Report**

- 1.3.1 The remainder of this report is structured as follows in order to fulfil the requirements set out in national guidance.
- 1.3.2 **Chapter 2** summarises the information that has been considered to inform plan review and why this is relevant, including key national, regional and local contextual changes that have occurred since LDP adoption. It also summaries the main findings of the three LDP AMRs including the SA monitoring.
- 1.3.3 **Chapter 3** reviews the LDP evidence base and which parts of it require updating.
- 1.3.4 **Chapter 4** sets out how the findings impact on the LDP Vision, Aims and Objectives, implementation of the Strategy, and the Policies and Proposals in order to inform the review process. It includes a concise review of each plan topic area, and implications for any parts of the Plan not proposed to be amended in terms of coherence and effectiveness of the plan as a whole. This chapter also considers the SA/SEA and HRA.
- 1.3.5 **Chapter 5** considers and explains opportunities for joint working with other LPAs.
- 1.3.6 **Chapter 6** makes clear conclusions on whether a Full or Short Form Review procedure is required.

1.3.7 The **Appendix** to this report provides some detailed supporting tables which are cross referenced to the main report chapters.

## Chapter 2. Contextual Changes and Other Factors Informing LDP Review

## 2.1 Introduction

2.1.1 This chapter summarises the new information that has been considered to inform plan review and why this is relevant, focusing on the key national, regional and local contextual changes that have occurred since LDP adoption. It also summaries the main findings of the three LDP AMRs that have been produced, including the results of the Sustainability Appraisal (SA) monitoring.

## 2.2 Contextual Changes

2.2.1 As reported in the AMR, since adoption of the Swansea LDP there have been a range of changes of significance relating to the planning context within which the LDP operates. These are summarised below.

## National Planning Context

2.2.2 Future Wales - the National Plan 2040 – This major new national policy document was published in February 2021 and forms the national tier of the Development Plan. It sets the strategic direction for development in Wales to 2040 and addresses key national priorities through the planning system. This national framework will be built on by SDPs at a regional level and LDPs at local authority level. SDPs and LDPs are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively.

2.2.3 Planning Policy Wales (PPW) updates – The two most recent updates to PPW have altered the national framework for development plan formation from that which applied when the current Swansea LDP was produced. Edition 10 was published in late 2018 just before the LDP was adopted and represented a complete re-working of national planning policy to take into account the Well-being of Future Generations (Wales) Act 2015, including the seven well-being goals and the five ways of working. It promoted the concept of placemaking within the planning system and set out the National Sustainable Placemaking Outcomes. The LDP was examined against PPW edition 10 and found to be in general conformity. The latest revision of PPW, edition 11, was published in February 2021, and involved revisions to align it with Future Wales and to take into account the socio-economic duty and impacts of the Covid-19 pandemic (see section below). It also makes policy changes to housing supply monitoring, affordable housing led sites and development quality standards, local energy planning, transport and active

travel. The Replacement LDP will need to be prepared with close reference to this updated national policy framework.

#### 2.2.4 Development Plans Manual, Edition 3 (March 2020)

- This detailed new Manual provides updated guidance for practitioners involved in the preparation and implementation of development plans. It is to be read alongside PPW and other relevant legislation and guidance, and contains practical guidance on how to prepare, monitor and revise a development plan. The updated Manual will be used to guide preparation of the Replacement LDP.

#### 2.2.5 Changes to Technical Advice Notes (TAN) -

- Revocation of TAN 1 Joint Housing Land Availability Studies (March 2020) – this reflected changes to PPW which removed the 5-year housing land supply policy requirement.
- Revocation of TAN 8 Planning for Renewable Energy (February 2021) – this reflected the publication of Future Wales which identifies preassessed areas for wind energy.
- TAN 11 Air Quality, Noise and Soundscape is being reviewed to bring it up to date and into line with PPW, the Noise and Soundscape Action Plan for Wales and the Clean Air Plan for Wales. TAN 11 was published in 1997 and only covered noise.
- Technical Advice Note (TAN) 15: development, flooding and coastal erosion (made available

**September 2021) -** this will also replace TAN 14: Coastal Planning, and will be accompanied by a new Flood Map for Planning (FMfP) to replace the existing Development Advice Map. The new TAN introduces important changes to the way flood and coastal erosion risks are considered in the planning process to ensure the planning system recognises the threat of, and takes action to adapt to, the likely effects of climate change on flood risk and coastal erosion. The risks associated with climate change will be built into planning policies and decisions by using the new FMfP, which includes flood risk zones showing future risk under a climate change scenario.

In November 2021, the Welsh Minister confirmed that the coming into force of the new TAN 15 and FMfP would be suspended until 1<sup>st</sup> June 2023 to enable LPAs to fully consider the impact of the climate change projections on their respective areas. The Minister also required every LPA to complete work to review the Strategic Flood Consequences Assessments (SFCA) for their area. The new TAN 15 and FMfP will apply to the Replacement LDP process and the reviewed SFCA will inform the LDP's strategy, policies and proposals. When drafting policies on flood risk the focus will be on site specific details and locally specific approaches, as there is no need to repeat national policies. The Replacement LDP will also need to complement the local flood strategy, by identifying key risks and setting out where flood and coastal erosion risk management schemes are to be located.

- 2.2.6 LDP end dates Letter (September 2020) This Welsh Minister letter clarifies that the provisions within the Planning (Wales) Act 2015 specifying the period to which a plan has effect did not commence until the 4th January 2016, and therefore LDPs adopted after this date will cease to be the LDP on the expiry period specified in the plan. Therefore, the Swansea LDP will cease to be the adopted LDP after 31<sup>st</sup> December 2025.
- 2.2.7 Wales Placemaking Charter This was launched by the Welsh Minister for Housing and Local Government in September 2020 and places quality, sustainability and community at the heart of planning. It brings together organisations who by signing the Placemaking Wales Charter Pledge to involve the local community in the development of proposals; choose sustainable locations for new development; prioritise walking, cycling and public transport, create well defined, safe and welcoming streets and public spaces, promote a sustainable mix of uses to make places vibrant and value and respect the positive distinctive qualities and identity of existing places. Swansea Council is now a signatory to the Placemaking Charter.
- 2.2.8 Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (July 2020) – This sets out WG planning policy priorities for the post Covid-19 recovery. It emphasises the need for good, high-quality developments which are guided by placemaking principles and identifies 8 key issues which bring individual policy areas together to ensure that action is the most effective. The Replacement LDP process will provide the opportunity to respond to the priorities and issues identified nationally and to aid recovery from the pandemic.
- 2.2.9 Planning and the Post COVID-19 Recovery: Letter to Local Authorities (July 2020) – This Welsh Minister letter requires LPAs to reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented. The Replacement LDP process will enable the LPA to respond to the impact of the pandemic on all elements of the LDP.
- 2.2.10 **Socio-economic Duty –** This duty, set within the Equality Act 2010, came into force in Wales on 31<sup>st</sup> March 2021 and is aimed at encouraging better decision making and reducing inequalities resulting from socio-economic disadvantage. The duty requires relevant public bodies when taking strategic decisions/policy formulation, to have due regard to the need to reduce the inequalities of outcome that result

from socio-economic disadvantage. This will need to be integrated into the assessment process associated with the LDP, and approach towards engagement.

- 2.2.11 **The Environment (Wales) Act 2016** This legislation introduced in March 2016 introduces a new policy framework to deliver the concept of 'sustainable management of natural resources' (SMNR). When preparing an LDP, the LPA is required to have regard to NRW's National Resources Policy, the State of Natural Resources Report (SoNaRR) and the South West Wales Area Statement which provide place based action and evidence.
- 2.2.12 Securing Biodiversity Improvements (October
  - 2019) This Chief Planning Officer letter draws the attention of LPAs to the Section 6 Duty of the Environment (Wales) Act 2016 (see above) and the need for planning authorities to 'seek to maintain and enhance biodiversity in the exercise of their functions. It goes on to state that LPAs should be proactive and embed appropriate policies into LDPs to protect against biodiversity loss and secure enhancement'. COP15, Biodiversity Deep Dive, Section 6 Duty and the Planning System, Chief Planning Officer Letter, WG, Dec 2022 The letter highlights the role of the planning system in meeting challenges laid down by COP15, the Deep Dive recommendations and in fulfilling the Section 6 duty in Wales. The letter also gives notice of proposed changes to PPW in relation to

net benefit for biodiversity and the protection afforded to Sites of Special Scientific Interest and trees and woodlands.

#### 2.2.13 The Second State of Natural Resources (SoNaRR) Report (December 2020) - The Environment (Wales) Act 2016 requires LPAs to have regard to the SoNaRR published by NRW, which provides an evidence base for LPAs when revising LDPs. This second report builds on the evidence base in the first SoNaRR in 2016 and illustrates some of the key challenges, priorities and opportunities for the sustainable management of natural resources.

#### 2.2.14 Welsh National Marine Plan (Nov 2019) – The Marine Plan is intended to support the sustainable development of the seas around Wales, providing a national policy framework for the Replacement LDP with regard to any aspects covering inshore and offshore areas. The Welsh Marine Area Statement, which covers the inshore waters of Wales, will also need to be considered.

## 2.2.15 Llwybr Newydd - The Wales Transport Strategy

(2021) – This sets out the WG vision for how the transport system can help deliver priorities for Wales in terms of 5 year and 20 year priorities, along with nine mini plans explaining how they will be delivered for different transport modes and sectors. The strategy requires governments, local authorities, transport

providers and colleagues in other policy areas to work together to ensure that transport contributes to the current and future well-being of Wales. This national strategy sets the framework for the two tiers of transport plans in Wales – the National Transport Finance Plan and Joint Local Transport Plans. The strategy and policies of the Replacement LDP will need to be consistent with these plans and strategies.

- 2.2.16 Active Travel Act Guidance (2021) Part 1 provides an outline summary of the aims, processes and key considerations associated with the duties of the Active Travel (Wales) Act (2013). Part 2, provides detailed technical advice on how infrastructure should be planned and designed. This guidance explains that Active Travel Network Maps should be used to inform the preparation and review of LDPs, with reference given to the requirement within PPW for these maps to inform site allocations.
- 2.2.17 Manual for Streets 2 (Urban and Rural Streets) (May 2019) – The new document extends the Manual for Streets to include urban and rural situations and fills the gap in advice between Manual for Streets and The Standards for Trunk Roads. Manual for Streets (Residential Streets) sets out how to design, construct, adopt and maintain new and existing residential streets.
- 2.2.18 Electric Vehicle Charging Strategy for Wales

(March 2021) – This sets out the WG vision for electric vehicle charging in Wales, that 'by 2025 all users of electric cars and vans in Wales are confident that they can assess electric vehicle charging infrastructure when and where they need it'. The strategy indicates that Wales currently has one of the lower levels of electric vehicle ownership in the UK and the strategy aims to increase public confidence in the availability of charging infrastructure. Swansea is identified as one area where there is likely to be a high charging demand for electric chargers of between 18,500-19,300 by 2025 and 55,685 to 57,145 by 2030.

- 2.2.19 Clean Air Plan for Wales (August 2020) This Plan aims to improve air quality and reduce the impacts of air pollution on human health, biodiversity, the natural environment and economy. The Plan supports delivery of commitments under 'Prosperity for All: the WG national strategy'. In particular, 'reducing emissions and delivering vital improvements in air quality' to support 'healthier communities and better environments'. WG also published in December 2020 a report on the impact of COVID-19 on air quality.
- 2.2.20 Schedule 3 of the Flood and Water Management Act (2010) – Disposal of Surface Water through SuDs (January 2019) – This legislation has had highly significant implications for the development industry and planning processes, and provides a framework for the approval and adoption of surface water systems

serving new developments. WG introduced five statutory instruments to implement this requirement. The statutory instruments made it a requirement from the 7th January 2019 for all new developments of more than one dwelling, or where the construction area is 100m<sup>2</sup> or more, to dispose of surface water through a sustainable drainage system (SuDS).

#### 2.2.21 Increasing The Supply of Affordable Homes

**Through Planning (July 2019) –** The WG issued guidance issued to LPAs re-iterating the importance of addressing the need for affordable housing, including making provision for affordable housing led sites when reviewing LDPs (which must include at least 50% affordable housing).

2.2.22 Welsh Development Quality Requirements (WDQR 2021) Creating Beautiful Homes and Places – This WG publication sets out that all affordable housing, including that provided through planning obligations and planning conditions, must meet WG's development quality standards, especially the DQR standard. WG have also set an ambition for private developers to adopt the standards by 2025. The new standards promote good design and generous space, so people live well within their homes. This is not only aimed to boost wellbeing and keep communities together, but to respond to the changing needs of residents. Particularly relevant with the moves towards flexible working.

- 2.2.23 Local Housing Market Assessments (LHMAs) A new methodology for undertaking LHMAs, including a tool and accompanying guidance, became operational on 31<sup>st</sup> March 2022. It is to be used as the only basis of evidence for the calculation of housing need in Wales from now on. As such all LDPs should be based on the outputs of the new methodology.
- 2.2.24 A Healthier Wales (2021) This sets out the WG national plan for health and social care to drive the changes needed to the Welsh health and social care system, so that it is able to meet the needs of current and future generations in Wales. Public Health Wales NHS Trust guidance - Maximising health and wellbeing opportunities for spatial planning in the COVID-19 pandemic recovery<sup>7</sup> - highlights the major positive and negative health impacts of spatial planning policies during the COVID-19 pandemic on the population of Wales, learn from these, any positive interventions and co-benefits in order to shape a healthier future environment for all.

<sup>&</sup>lt;sup>7</sup> Liz Green, Sue Toner, Laura Evans, Lee Parry-Williams, Tom Johnson, Gemma Christian, Cheryl Williams, Sumina Azam and Mark A Bellis. (2022). Public Health Wales NHS Trust

- 2.2.25 A Health Impact Assessment Toolkit for LDPs was published in 2021<sup>8</sup> - This Toolkit aims to support collaboration between the planning and public health sectors to maximise positive health and well-being outcomes through land use planning policies that create healthy, equitable and cohesive communities. The aims of the Toolkit are to:
  - Outline the strategic considerations that can support the maximisation of public health input into land use planning policy
  - Re-introduce the relevant policy frameworks including any progress since Planning for Better Health and Well-being was published in 2016 and note any updates
  - Highlight specific points within the policy development process where key Public Health contributions can be made to support and inform the policy
  - Provide supporting information to maximise a consideration of health and well-being in planning development processes via the application of HIA
  - Provide real-life recent case-study examples and the insight from the officers who worked on these
  - Provide practical resources to apply HIA within the policy development process, primarily at a local level but could be applied at a regional or national level

where and when applicable.

- 2.2.26 Net Zero Wales and All Wales Plan 2021-2025 (October 2021) - WG reduction plan for Carbon Budget (2021-2025) – This sets the foundations to make Wales net zero by 2050. Alongside this, the first All Wales Plan has been published, which demonstrates the commitment from partners in working together to reach Net Zero.
- 2.2.27 **Beyond Recycling (March 2021) Strategy –** This lays out the steps to be taken over the next decade towards achieving a circular economy.
- 2.2.28 Strategic Assessment for the future need for energy from waste capacity in the three economic regions of Wales (March 2021) - confirms the announcement of a moratorium on any future large scale (10MW or greater installed capacity) energy from waste developments. It also updates and replaces the residual waste arisings estimates and forecast scenarios in the 2012 Collections Infrastructure and Markets Sector Plan, which TAN 21 Waste advises should be used in assessing the level of need for energy from waste facilities and the extent of any capacity gap.

<sup>&</sup>lt;sup>8</sup> Liz Green, Lee Parry-williams, Ed Huckle (2021) Health Impact Assessment (HIA) and Local Development Plans (LDPs): A Toolkit for Practice. WHIASU, PHW WHO Collaborating Centre on Investment for Health and Well-being

#### 2.2.29 Noise and Soundscape Action Plan (2018-2023) -

outlines the Welsh public sector's strategic policy direction in relation to noise and soundscape management for the next five years. It has a broader focus than just reducing noise levels alone, recognising also the need to create appropriate soundscapes, meaning the right acoustic environment in the right time and place.

#### 2.2.30 Natural Resources Wales (NRW) Phosphate

**Targets** - In January 2021, NRW introduced new tougher targets and guidance for phosphate pollution in riverine Special Areas of Conservation (SAC's) across Wales. As a result of these targets it has become necessary to identify ways in which to ensure that new residential developments do not increase the nutrient load on SAC's following discharge from a sewage treatment network. There are no affected riverine SAC's within Swansea but the Replacement LDP work will need to be aware of this context particularly with regard to the situation within neighbouring Carmarthenshire.

2.2.31 Managing the impact of second homes and shortterm holiday lets - Changes to the planning system were introduced in October 2022 to support LPAs in managing the impact of second homes and short-term holiday lets in their areas. Three new planning use classes – a primary home, a second home and shortterm holiday accommodation were introduced and where LPAs, have evidence, they can introduce controls requiring planning permission for the change of use between the three use classes. WG has introduced changes to national planning policy to give local authorities the ability to control the number of second homes and holiday lets in any community. PPW has been amended to make it explicit that, where relevant, the prevalence of second homes and shortterm holiday lets in a local area must be taken into account when considering the housing requirements and policy approaches in LDPs.

2.2.32 **Brexit Impacts –** There have been a variety of changes to legislation and terminology arising as a result of the UK's withdrawal from the European Union, which includes for example the 2019 amendments to the Conservation of Habitats and Species Regulations 2017 (as amended) (known as the 2019 Regulations).

## **Regional Planning Context**

2.2.33 Corporate Joint Committees and the South West Wales SDP – Future Wales identifies four planning regions in Wales and that SDPs will be required in each to form a regional tier of Development Plans. Matters relating to housing and economic growth, as well as digital connectivity and transport accessibility, should be co-ordinated and planned across the whole region by means of the SDP. Swansea is identified as being within the South West Wales region illustrated below.

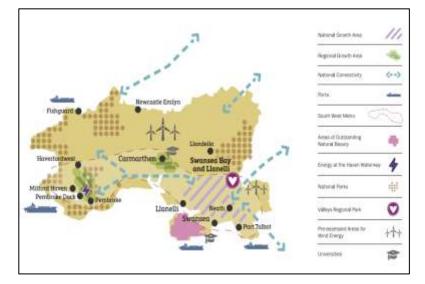


Figure 1 South West Wales Regional Diagram

2.2.34 Future Wales Policy 1, 'Where Wales will Grow', identifies three National Growth Areas (NGAs). One of these NGAs is known as 'Swansea Bay and Llanelli' which is to be the focus in the region for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure and overall the main focus for growth and investment in the region. Future Wales provides an indicative outline of the NGA. Further evidence has been commissioned in order to understand the geographical area that this NGA should cover.

- 2.2.35 The preparation of a SDP must ensure the region manages growth in a planned and co-ordinated way to support the needs of the National and Regional Growth Areas and the wider region.
- 2.2.36 The Local Government and Elections (Wales) Act establishes Corporate Joint Committees (CJCs) for the regions in Wales. With specific regard to the strategic planning function, i.e. preparing an SDP, each CJC from the 30 June 2022, has the ability to exercise its statutory duty to prepare an SDP. SDP's will deliver more effective planning outcomes for communities by ensuring key issues, development and associated infrastructure is planned for in an integrated and comprehensive way across a wider geographical area. Working on the basis of SDP preparation taking at least 5 years in line with the latest WG guidance, and the time needed for newly formed Authorities to formally agree the commencement of the process, the earliest an SDP is likely to be adopted is by the end of 2029. This is of course subject to change and a number of unknown factors but is beyond when the Replacement LDP would need to commence. Until an SDP is adopted, LDPs should continue to be prepared. When an SDP is adopted in the future, LDP Lites will be prepared within the SDP area for each respective LPA.

- 2.2.37 To inform the Replacement LDPs of constituent LPAs, and the future introduction of a SDP, officers in the *South West Wales Regional Planning Group* are working collaboratively on updating and aligning key evidence base elements across the region, including a joint Swansea and Neath Port Talbot Economic and Housing Growth Assessment and Local Housing Market Assessment; study to identify the geographical extent of the NGA; and continued collaboration on viability work building on the establishment of the Development Viability Model (DVM tool) for the financial viability of development proposals across the region.
- 2.2.38 Swansea Bay City Deal progress the City Deal, established in 2017, will part-fund a program of major transformational projects across Swansea, Carmarthenshire, Neath Port Talbot, and Pembrokeshire over the coming years. The first £18 million of City Deal funding has been released by WG and UK Government, based on the approval of two City Deal projects, one of which is in Swansea - the City and Waterfront Digital District. Construction on the indoor arena forming part of the Swansea City and Waterfront Digital District project was completed in 2021-22. Planning consent was also granted for the digital village on the Kingsway during 2020 and construction is underway. Both sites form integral elements of the LDP Strategic Development Area covering the Central Area and Waterfront (SD J) and

will deliver on key regeneration and placemaking objectives for these areas.

#### 2.2.39 South West Wales Regional Economic Delivery

Plan (REDP) - The Council recently adopted the South West Wales REDP as the Council's over-arching economic regeneration policy to replace the Swansea Bay City Region Economic Regeneration Strategy. The **REDP** complements the new Welsh Government Regional Economic Framework (REF) and provides a further layer of detail below the REF, outlining the objectives and actions that will deliver against the high level vision in the REF. The REDP sets out an ambitious 'route map' for the development of the region's economy over the next ten years, identifying priorities for intervention and setting out how business, government, education, voluntary/ community organisations, social enterprises and other partners can work together to bring them forward. The REDP identifies three ambitions for building a South West Wales that is:

- "resilient and sustainable;
- enterprising and ambitious; and
- balanced and inclusive".
- 2.2.40 These ambitions support three complementary missions:
  - Establishing South West Wales as a UK leader in

renewable energy and the development of a net zero economy, which involves taking forward the region's major energy related projects and driving the benefits through the region.

- Building a strong, resilient, and 'embedded' business base by supporting business and entrepreneurship through technology, infrastructure and public sector support.
- Growing and sustaining the 'experience' offer by linking environmental quality, quality of life and community character.
- 2.2.41 **Joint Local Transport Plan –** The Joint Local Transport Plan for South West Wales (2015 - 2020) is the statutory policy which determines the strategy and programme for transportation and transport infrastructure within Swansea. The plan provides a consistent policy which is applied across the four councils in South West Wales. The JLTP will provide an important consideration for the Replacement LDP.
- 2.2.42 **Swansea Bay and West Wales Metro –** Future Wales contains a policy to develop a south west Wales Metro, which aspires to create new integrated transport systems providing faster, more frequent and joined-up services. Transport for Wales (TfW) is developing Metro concepts for a number of areas across Wales. The overarching concept is to provide an accessible, integrated and comprehensive network using a variety of modes such as heavy rail, tram-train, light rail and bus as appropriate to individual routes. Feasibility

design and operational assessment and appraisals of various options to improve rail services and facilities in South West Wales are ongoing and will need to be monitored to inform the Replacement LDP.

2.2.43 Regional Technical Statement on Aggregates North and South Wales (Second Review), September 2020

 informs the provision of adequate reserves of aggregates in the LDP in order to ensure sufficient provision for construction and other industries in the most sustainable manner reasonably achievable.

## Local Planning Context

- 2.2.44 Local Well-being Plan Swansea Public Services Board has prepared its second Assessment of Local Well-being for public consultation in March 2022. This will help Swansea Public Services Board identify a focused number of well-being objectives that will contribute to the national well-being goals as set out in the Well-being of Future Generations (Wales) Act 2015 and will be used to develop Swansea's next Local Wellbeing Plan, which will provide an overarching framework for all LA plans/strategies including the Replacement LDP.
- 2.2.45 Further local strategies and policy that will provide important evidence base for the Replacement LDP include the following list below.

#### 2.2.46 Council Corporate Plan 2022/23: Delivering a Successful and Sustainable Swansea - identifies challenges facing Swansea which include:

- Population changes a growing, ageing and more diverse Swansea.
- Economic changes attracting investment, high quality jobs and new technology into Swansea while addressing the skills gap.
- Climate change and nature emergencies risks from flooding, air and water quality, dangers to ecosystems and biodiversity and energy security.
- Social and cultural changes addressing inequalities in health, education, employment and life chances.
- Covid-19 helping Swansea to recover and transforming the Council to meet the changes and the new challenges ahead.
- 2.2.47 The Corporate Plan prioritises six well-being objectives for 2022-23, and the following are of relevance to land use planning:
  - Transforming our Economy & Infrastructure so that Swansea has a thriving mixed use City Centre and a local economy that will support the prosperity of our citizens.
  - Tackling Poverty so that every person in Swansea can achieve their potential.

- Delivering on Nature Recovery and Climate Change so that we maintain and enhance nature and biodiversity in Swansea, reduce our carbon footprint and tackle climate change.
- 2.2.48 Three clear values will guide the way the Council works:
  - People focus
  - Working together
  - Innovation
- 2.2.49 Three key principles underpin the Council's plans and priorities:
  - Sustainability
  - Prevention
  - Partnerships

## 2.2.50 Climate and Nature Emergencies In 2019, Swansea

Council declared a Climate Emergency and has followed this up with an action plan to reduce organisational emissions, a policy review to tackle climate change as part of everything the Council does, and plans for engagement to work with partners and citizens in striving for a net zero carbon Swansea by 2050. The Council has an organisational target of a net zero Swansea Council by 2030. This means reducing and offsetting carbon emissions from the Council's activities and estate. But to make a real difference the whole of Swansea has to reduce its carbon footprint. The Council's ambition is for a net zero Swansea by 2050.

- 2.2.51 The Council recognises that biodiversity loss is every much as serious to our future survival as climate change and they are inherently linked. In support of WG's declaration of a nature emergency, the Council declared a nature emergency in 2021 and the resulting Section 6 Plan, based on the Swansea Local Nature Recovery Action Plan (LNRAP) (produced by the Swansea LNP), will need to be considered for the Replacement LDP. (NB both the Section 6 Plan and LNRAP are still in draft as of 05/04/2023).
- 2.2.52 **Green Infrastructure Strategy** A new GI Strategy (Swansea Central Area: Regenerating our City for Wellbeing and Wildlife) was published in February 2021. This has been designed to deliver on the aim to bring more GI into the Swansea Central Area.
- 2.2.53 **Supplementary Planning Guidance -** A number of SPG documents supporting the LDP, have been adopted following public consultation on draft documents since the Plan was adopted, including:
  - Houses in Multiple Occupation (HMO) and Purpose Built Student Accommodation (PBSA) SPG
  - Biodiversity and Development SPG
  - Mumbles Conservation Area Review SPG
  - Trees, Hedgerows and Woodlands SPG

- Placemaking Guidance for the Gower Area of Outstanding Natural Beauty (AONB) SPG
- Placemaking for residential development for developments of 10 and more homes; infill and backland development of between 1-10 homes within existing communities; and guidance for Householder development relating to alterations and extensions to existing home.

## **Covid-19 Pandemic**

2.2.54 The huge societal and economic shock caused by the Covid-19 pandemic is a highly significant contextual change that clearly the Swansea LDP had neither envisaged or planned for in terms of policy or strategy. The crisis impacted on site operations (including closure of sites and/or social distancing having big impacts on operations), and led to labour supply issues, rising costs of materials and extended lead in times due to supply chain problems. Moreover, the pandemic has altered behaviors (such as the propensity to travel, the demand for locally accessible services, etc.) and working practices, which may have a significant degree of permanence. The Welsh Ministerial Letter to Local Authorities (July 2020) on Planning and the Post COVID-19 Recovery requires LPAs to reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented.

## 2.3 Key Findings of the LDP Annual Monitoring Reports (AMRs)

- 2.3.1 All of the AMRs published in relation to the Swansea LDP have reviewed the changes affecting the planning context in which the Plan operates. These aspects have informed the earlier sections of this Chapter and are not repeated again here.
- 2.3.2 As well as the profound impact on society and development activity, the COVID 19 pandemic has had a significant impact on some of the activities monitored over the period (e.g. housebuilding rates; and while traffic flows have increased from low levels during the height of the pandemic, traffic patterns remain markedly altered from pre pandemic habits). COVID recovery will need to be taken into account in the preparation the Replacement LDP.
- 2.3.3 The LDP Monitoring Framework is based around the Strategic Policies of the Plan, with indicators to measure the effectiveness of the policies and the progress in delivering allocations and infrastructure. AMR 3 showed that overall, the majority of indicators continue to show positive policy implementation and are shown as green. It highlights however that some key policy indicator targets and monitoring outcomes, particularly those relating to housing and employment

land delivery and the provision of Gypsy and Traveller pitches, are not being achieved. This indicates that these policies are not functioning as intended, and in these instances the statutory 4 year LDP review will provide the opportunity to address these issues as part of the Replacement LDP.

2.3.4 In these instances the monitoring has recommended specific actions, including the review of particular policies (e.g. in relation to specific site allocations (and in some cases this is to reflect that the site now has planning consent and so needs to be shown as a commitment rather than as an allocation in the next LDP); and for Gypsy/Traveller pitch provision). For other issues and indicators, the AMR finds that these should be taken account of more generally in the Plan review, including indicators that highlight the Plan is not delivering the anticipated levels of housing growth to meet the requirements over the Plan period. Table 1 summarises the outcome for all the indicators.

Assessment	Action	Number of Indicators
Indicators suggest that the Plan policies are being implemented	Continue Monitoring	95
effectively and there is no cause for review	(Green)	
Indicators suggest that the Plan	Training	0
Policies are not being implemented	Required	
in the intended manner.	(Blue)	
Indicators suggest the need for	SPG	0
further guidance in addition to those	required	
identified in the Plan	(Purple)	
Indicators suggest the Plan Policies	Further	5
are not being effective as originally	investigation/	
expected.	research	
	required	
	(Yellow)	
Indicators suggest that Plan	Policy	18
policy/ies are not being	Review	
implemented.	(Orange)	
Indicators suggest the Plan strategy	Plan Review	7
is not being implemented.	(Red)	

2.3.5 A small number of indicators have been flagged for further investigation and research as a result of the monitoring findings. This research will be routinely needed to inform the Replacement LDP and includes updating the evidence base for residential windfall site rates; the latest published Gypsy and Traveller need; high level viability testing for infrastructure and affordable housing provision; the need for land for mineral extraction; and reasons for district heating networks not coming forward. These are arising from the monitoring framework of indicators and will inform the research needed for the Replacement LDP, but do not represent an exhaustive list and the LDP evidence base as a whole will need to be reviewed.

2.3.6 In conclusion, AMR 3 highlights that the Council must undertake a comprehensive review of the Swansea LDP no longer than 4 years from the date of its adoption, which in relation to the Swansea LDP adopted date (February 2019) means the statutory requirement to commence a review of the Swansea LDP is by February 2023 at the latest. It finds that, given this impending need to review and the findings in respect of certain monitoring indicators, it is appropriate that a LDP Review Report should now be prepared in-line with Welsh Government guidance.

## 2.4 Findings from the Annual SA Monitoring

2.4.1 The LDP SA Report identified the 8 key issues for monitoring related to the delivery of sustainable development and well-being of communities, where the implementation of the LDP will have the most significant likely effects. AMR 3 presented tables setting out the results from the first, second and third years of monitoring the implementation of the LDP. A summary of the outcomes against each of the issues is set out below:

- Loss of habitats and species (biodiversity)
- 2.4.2 LDP policies seek to maintain and enhance the County's biodiversity resource and protected habitats and species and the monitoring has shown that the policies are being implemented effectively. The adoption of the Biodiversity and Development SPG has further aided the implementation of the policies.
  - Impact on landscape character, particularly protected landscapes
- 2.4.3 Development undoubtedly can have an impact on landscape character. However, the AMR indicates that there has been no detrimental impact within the County, particularly protected landscapes, during the monitoring period; and the LDP policies are being implemented effectively.
  - Impact on the cultural and historic environment, particularly the Welsh language and archaeology
- 2.4.4 The AMR indicates that there has been no detrimental impact on the County's cultural and historic environment during the monitoring period and the LDP policies are being implemented effectively, including with regard to the Welsh Language.

- Air pollution, particularly with regard to increased vehicular emissions as a result of new development through the AQMA and City Centre
- 2.4.5 The analysis has shown that the LDP policies are being implemented correctly and should be having a generally positive impact on air quality.
  - Increased development in flood risk areas, particularly with regard to the City Centre and waterfront destinations
- 2.4.6 The analysis has shown that the LDP policies are being implemented correctly and should be having a generally positive impact with regard to avoiding development in flood risk areas. Changes to TAN 15 will be a key consideration for the Replacement LDP.
  - The provision of affordable housing to meet local needs, particularly in rural areas.
- 2.4.7 The indicators demonstrate the levels of affordable housing being secured and delivered. Overall, throughout the County, housing (of all tenures) is being delivered, but the volume is less than anticipated due to time lags for example in the delivery of some larger sites. Planning permission for some allocated affordable housing sites in rural areas has been granted within the monitoring period, thereby helping local people stay within their communities. Construction has commenced on 60%

of the total units anticipated to be delivered across the six allocated H5 sites within Gower and the Gower Fringe but overall the level of affordable rural housing delivered so far has been less than anticipated.

- The provision of necessary social and community infrastructure and highway and transport improvements, to facilitate the delivery of SDAs as required by the masterplanning principles to deliver sustainable and cohesive communities.
- 2.4.8 The indicators demonstrate the levels of infrastructure being secured and delivered through the planning system to help deliver sustainable and cohesive communities. A range of community facilities and social infrastructure have been permitted as part of permissions granted on SDAs, helping to facilitate sustainable and cohesive communities.
  - Increase employment and economic activity throughout the County as a result of the economic strategy which underlines the Plan.
- 2.4.9 The amount of employment land granted planning consent in 2019-20, 2020-21 and 2021-22 provides 31.1% of the 19 ha LDP employment land requirement. This will have a general positive impact on the development of Swansea as a competitive place and contribute to Swansea's role as a regional economic driver. It will help contribute to a prosperous economic outlook and sustainable economy.

#### **Chapter 2 Conclusions on Contextual Changes and Other Factors Informing LDP Review**

- There are a wide range of factors and material changes in circumstance that will have a bearing on decision making relating to the replacement Swansea LDP

- The Ministerial letter on Plan end dates which has confirmed that the adopted LDP will expire on 1<sup>st</sup> January 2026

- The findings of the AMRs, in particular AMR 3 which has triggered a review of the LDP, highlight the need to commence review by February 2023 in order to meet the statutory requirement to review the Plan and its evidence base at least every 4 years

- A key finding of AMR 3 - which is considered in Chapter 4 of this report - is the slower than anticipated delivery of development allocated in the LDP, similar to other areas of South Wales.

 Significant changes in the overarching planning policy context include the adoption of Future Wales as the higher national tier development plan and its implications, along with the latest edition of national policy (PPW), WG planning policy on COVID recovery, emerging regional policy work, and the latest Local Well-being Plan will need to inform the Replacement LDP.

- The updated Welsh Government guidance on preparing LDPs, will be a crucial reference point. This clearly sets out guidance for Plan review and the parameters for consideration of the type of review procedure to be adopted in terms of Long Form versus SFR (which are referenced elsewhere in this report).

- There are numerous other new and updated policy and other contextual factors listed in Chapter 2 that will also need to inform the Replacement LDP.

# Chapter 3. Future Evidence Base Requirements

## 3.1 Introduction

- 3.1.1 This Chapter reviews the LDP evidence base and which parts of it require updating to support changes to the Plan. Regulation 41 specifically highlights that, in the context of the statutory requirement to review an LDP within 4 years from the date of adoption, the evidence that informs an LDP will be considered dated beyond that 4 year date.
- 3.1.2 The foundation of the Replacement LDP must be an appropriate, robust and up to date evidence base. Understanding if, or where, there are gaps in the existing LDP evidence and what needs to be updated, will be essential.

## 3.2 Evidence Base Review

3.2.1 There are a range of elements of the existing LDP evidence base that have become out-of-date given the time that has passed since Plan adoption, and moreover when some of the supporting evidence was initially prepared. Within the time elapsed there have been significant contextual, legislative and policy changes, which have been set out in detail in Chapter 2 of this report. These include, for example, evidence relating to new demographic projections and economic forecasts, the impacts of updated national flood risk policy and mapping, and the economic and societal changes caused by the COVID pandemic and BREXIT.

- 3.2.2 A list of evidence base assessments either emerging or likely to be required to inform the Replacement LDP is provided below:
  - Population, economic and housing growth assessments
  - Employment land review
  - Local Housing Market Assessment
  - Future Wales National Growth Area Review
  - Gypsy and Traveller Accommodation Assessment
  - Strategic Transport Assessment
  - Retail Assessment
  - Urban Capacity Study
  - Settlement Boundary Review, including village assessments
  - Financial Viability Assessments
  - Infrastructure Requirements Review
  - Renewable and Low Carbon Energy Assessment
  - Strategic Flood Consequences Assessment
  - Green Infrastructure and Open Space Assessment
  - Welsh Language Impact Assessment and review of the Welsh Language Sensitive Area
  - Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working

Parties, 2nd Review (and Annex B South Wales), 2020; and The South Wales Regional Aggregates Working Party (SWRAWP) Annual Monitoring Reports

- 3.2.3 This list focuses on studies that the LPA needs to undertake. It is not intended to be completely definitive of all evidence needed for the Plan. Some of these studies will include sub elements of detail which are not itemised. There will also be key evidence and data sets that are not listed but will be key to informing these studies and/or Replacement LDP formation, such as the latest demographic projections and economic forecasts. Additional evidence base update requirements may emerge as the preparation of the Replacement LDP progresses and the LPA will continue to monitor and implement the required research for any other evidence needs that emerge.
- 3.2.4 The Council continually keeps the evidence on which the Plan is based under review. Already in 2022 the Council has commissioned work in partnership with neighbouring Authorities to review the Swansea Bay and Llanelli National Growth Area Study and comprehensively assess population, economic and housing growth. It has also jointly commissioned an updated Local Housing Market Assessment, in line with

Welsh Government guidance. The Council will continue to consider the benefits of joint working with neighbouring Planning Authorities to pool resources, reduce costs and plan effectively across borders to take account of issues that have implications beyond individual administrative boundaries.

3.2.5 The remainder of this Chapter focuses on the latest Welsh Government population and household projections, released since adoption of the current LDP. PPW explains that these projections, alongside the latest LHMA and Local Well-being Plan, form a fundamental part of the evidence base for development plans.

## 3.3 Population and Household Data

#### Latest Demographic Projections

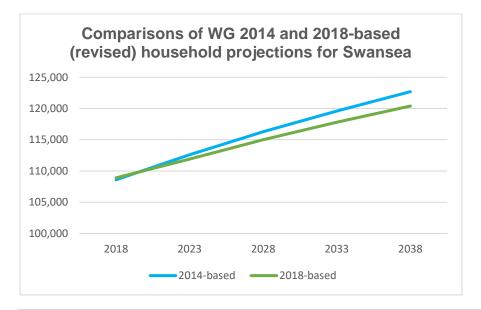
3.3.1 Since the adoption of the LDP, WG has published trend-based population and household projections for Welsh local authority areas. These projections are 2018-based<sup>9</sup> and are the last published before the 2021 Census results. They supersede earlier projections, including the previous 2014-based which formed the latest evidence reviewed for the adopted LDP.

2018-based household projections (revised). Swansea Council - Information, Research & GIS (SDU), December 2020.

<sup>&</sup>lt;sup>9</sup> 2018-based population projections. Swansea Council - Information, Research & GIS (Strategic Delivery Unit), August 2020.

- 3.3.2 Under the principle projection, the total population of Swansea is projected to increase from an estimated 246,500 in 2018 to 254,400 in 2028, an increase of 7,900 (+3.2%) over the first ten-year period. The total number of households in Swansea is projected to increase from an estimated 108,900 in 2018 to 115,000 in 2028 (+6,100 or +5.6% over 10 years).
- 3.3.3 Figure 2 illustrates a comparison of these most recent household projections against the previous set released by WG.

## Figure 2: Comparisons of WG 2014 and 2018-based (revised) household projections for Swansea



## Table 2: Comparisons of WG 2014 and 2018-based(revised) household projections for Swansea

Year	2014-based	2018-based
2018	108,600	108,900
2023	112,600	111,900
2028	116,300	115,000
2033	119,600	117,800
2038	122,700	120,400

- 3.3.4 Overall, the Welsh Government's 2018-based subnational household projections point to a continuation of growth in Swansea, but the rate of growth is lower than projected in the previous set of projections on which the LDP was based. For example, over the first common ten-year period (2018-28), projected growth in the 2018-based projections is 5.6%, lower than the 7.1% figure in the previous (2014-based) projections. The gap between the figures widens slightly for the duration of the projection period.
- 3.3.5 WG have also produced alternative lower and higher projections by varying the assumptions used. The outputs for Swansea are shown below.

## Table 3: Welsh Government 2018-based varianthousehold projections to 2028 and 2043, Swansea

Variant: Swansea	Projected Change to 2028	Projected Change to 2043	
Lower Variant	+5000 (+4.6%) to	+8,600 (+7.9%) to	
	113,800	117,500	
Principal	+6100 (+5.6%) to	+14,000 (+12.8%) to	
Projection	115,000	122,800	
Higher Variant	+6,900 (+6.4%) to	+18,100 (+16.6%) to	
	115,800	126,900	

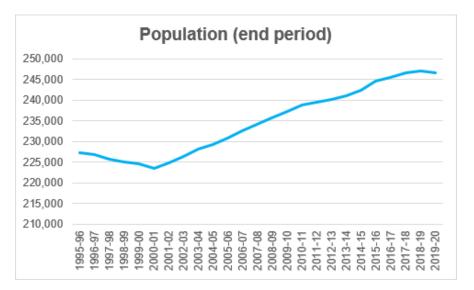
#### **Mid Year Population Estimates**

3.3.6 Mid Year Estimates (MYE) of the population are published annually. The latest MYE for June 2020 (published June 2021) indicated a population for Swansea of 246,600, a decrease in population size of 400 on the 2019 MYE (the first recorded decrease in Swansea's population since 2001 as shown by Figure 3 below). This decrease was mainly due to negative natural change with deaths exceeding births by 600 on the previous year; while negative net internal (UKbased) migration was offset by continued estimated growth from net international migration.

Area	Mid-2019 Population	Components of Change		Migration and Other	Mid-2020 Population
		Births	Deaths	Changes	
Swansea	247,000	+2,200	-2,800	+200	246,600
Wales	3,152,900	+29,400	-35,800	+23,100	3,169,600
UK	66,796,800	+700,700	-669,200	+252,900	67,081,200

Source: MYE 2019-20 ONS

#### Figure 3: MYE of population change for Swansea 1995-20



3.3.7 The estimates cover the period up to 30 June 2020 and so only describe some of the impacts of the early part of the COVID-19 pandemic on the population. The 2020 MYE is the last set of annual mid-year estimates to be published based on the 2011 Census.

#### Census 2021

3.3.8 In June 2022 ONS released initial rounded outputs from the 2021 Census. These outputs suggest there has been no growth in the population of the County between census dates – in fact a minor -0.2% reduction from 239,023 residents in 2011 to 238,500 in 2021. This runs counter to the general trends identified in the MYE of population (above) which had shown an increase to 246,600 by 2020. In comparison, over the same inter Census period (2011-2021), Wales saw an increase of +1.4%.

- 3.3.9 The number of households in the County has increased by approximately +1.5% from 103,497 in 2011 to 105,000 in 2021, but this is around 5,000 fewer than the latest MYE. Over the same inter Census period, Wales saw an increase of +3.4%.
- 3.3.10 The 2021 MYEs, the first to be based on the latest Census results, are scheduled to be published by ONS in Autumn 2022, with the mid-year population estimates for 2012 to 2020 due to be revised (re-based using 2021 Census data) in early 2023.
- 3.3.11 Further analysis of these Census figures as each set is released will be undertaken and will be crucial to understanding the implications for the Replacement LDP's level of growth. This work is being progressed as part of the Economic and Housing Growth Assessment commissioned jointly with neighbouring Authorities.

# Chapter 3 Conclusions on Future Evidence Base Requirements

- Regulation 41 states that an LDP must be reviewed at least every 4 years from the date of adoption and the legislation is clear that beyond four years the evidence base becomes dated. The foundation of the Replacement LDP will be a robust and up to date evidence base.

- This Chapter has identified the main studies that will be required to be updated but is not intended to be an exhaustive list.

A key requirement will be to take account of the evident changes in population and household forecasts.
 Changes could be needed to the LDP's growth strategy as a result which will require the Full Revision procedure to be adopted rather than a SFR because the SFR procedure specifically excludes Regulation 15 and the requirement to undertake pre-deposit public consultation on the scale and distribution of growth. The Full Revision procedure will also allow the LPA to review the whole LDP evidence base to ensure it remains up to date.

# **Chapter 4. Review of adopted Swansea LDP**

# 4.1 Introduction

4.1.1 This chapter sets out how the findings in Chapters 2 and 3 are considered to impact on the Swansea LDP. This includes impacts upon the Plan Vision, Aims, Objectives, Growth Strategy, Spatial Strategy, Policies and Proposals, all with a view to informing the LDP review process. It includes a review of each plan topic area, and implications for any parts of the Plan not proposed to be amended in terms of coherence and effectiveness of the plan as a whole. This chapter also considers the SA/SEA and HRA.

# 4.2 Review of LDP Issues, Vision and Objectives

4.2.1 A significant amount of evidence gathering and background research was undertaken during the course of preparing the Swansea LDP, in order to identify the key strategic opportunities and issues that the Plan needed to address. These are summarised in Chapter 1 of the LDP, grouped under the well-being headings of economic; social and cultural; and environment. They highlight the broad spectrum of areas where the Plan can affect change, particularly in terms of improving sustainability and well-being. However, the list is noted as not being exhaustive since the range of issues affecting and affected by the Plan is extensive. These key strategic opportunities and issues then fed into the development of the LDP vision and strategic objectives.

4.2.2 The LDP Vision clarifies the core purpose of the Plan, how the County is expected to change and describes the sort of place it should become during the Plan period. The vision was formulated to ensure the Plan addressed the key opportunities and issues identified, reflected Swansea's regional context, and translated the well-being vision for Wales as a whole into the local context. It accorded with the strategic planning priorities in relevant national, regional and other local policies and strategies including the Swansea Local Well-being Plan (2018), and was shaped by public and stakeholder engagement.

#### Figure 4: LDP Extract - The LDP Vision



- 4.2.3 The LDP vision is delivered through 24 strategic level objectives for improving economic, environmental, cultural and social well-being.
- 4.2.4 Figure 4 of the LDP illustrates that the LDP objectives were tested against how they will help deliver the seven shared well-being goals for Wales. They also have sustainability and placemaking as core principles.
- 4.2.5 It is not therefore anticipated that significant changes will be required but the LDP opportunities, issues, vision and objectives will need to be checked against relevant changes in background evidence and context, including, for example, the relationship to Future

Wales, updated PPW and the National Sustainable Placemaking Outcomes, the latest Local Well-being Plan and Council Corporate Plan and priorities; and stakeholder engagement. This will include identifying any opportunities and issues that have been addressed/achieved as well as those which remain relevant going forward, together with any newly identified factors that need to be added, including for example any matters relating to recovery from the COVID pandemic.

# 4.3 Review of the LDP Growth Strategy

# **Reviewing Scale of Growth Requirements**

- 4.3.1 The LDP identifies a requirement for 15,600 new homes over the plan period 2010-25 and a requirement for 19 hectares of employment land to accommodate the forecasted creation of 13,600 new jobs. These requirements form the basis of the following Strategic Policies:
  - PS 3: Sustainable Housing Strategy
  - PS 4: Sustainable Employment Strategy
- 4.3.2 These requirements were identified from an evidence base which evolved during the preparation of the LDP in order to take account of the most up to date evidence (such as demographic projections and employment forecasts) and consultation comments.

Due to the time that has elapsed since LDP adoption, this evidence base is now out of date and will need to be updated for the Replacement LDP.

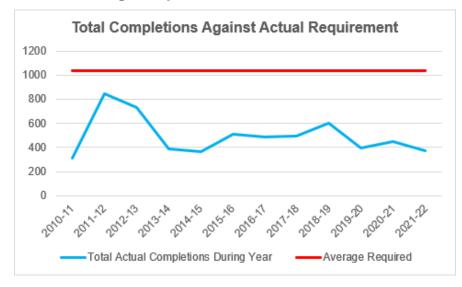
- 4.3.3 The Council has jointly commissioned with NPT Council an Economic and Housing Growth Assessment and Local Housing Market Assessment in order to inform the level of growth that should be taken forward in the Replacement LDP. This assessment will follow the requirements of the Development Plans Manual. This study will consider jobs and new homes collectively ensuring that both economic and housing growth are broadly aligned in order to inform a sustainable strategy. In-line with PPW, the latest Welsh Government local authority level Household Projections for Wales, alongside the latest LHMA, will form a fundamental part of the evidence base for the Replacement LDP.
- 4.3.4 A key requirement of the Replacement LDP will be to take account of the evident changes in population and household forecasts (summarized in Chapter 3) and updated forecasts of employment growth. Changes could be needed to the LDP's growth strategy as a result which will require the Full Revision procedure to be adopted rather than a SFR because the SFR procedure specifically excludes Regulation 15 and the requirement to undertake pre-deposit public consultation on the scale of growth.

4.3.5 In terms of levels of future growth, Future Wales identifies that under the WG central estimates 25,600 additional homes are needed in the South West region until 2039. Future Wales states that this is not intended to prescribe a housing requirement, but provides part of the evidence and context on which housing policy and requirements can be based for LDPs in the region.

# **Reviewing Delivery**

- 4.3.6 The AMRs have reported on progress towards achieving the growth requirements set out in the LDP and this progress is summarised below at the County level. Further breakdown by area / types of site is provided in the spatial strategy section.
- 4.3.7 In order to meet the requirement for new dwellings set out in policy PS 3, an average of 1,040 additional homes were required to be completed each year, across the 15-year plan period. Overall, AMR 3 has noted that 5,952 dwellings have been completed between 2010-11 and 2021-22. This equates to 48% of the cumulative average annual requirement (AAR). The chart below illustrates the dwelling completions from 2010 to 2022 plotted against the AAR.

# Figure 5: New Dwellings Built Per Year Compared to the Annual Average Requirement for the LDP Period



4.3.8 Land for employment uses is allocated in Policy PS 4 to accommodate the forecasted job growth and employment land requirement, while allowing flexibility in terms of providing a range of different types of site. The amount of employment land consented on allocated sites is monitored in the AMR and is summarised in the table below. Overall approximately 5.9 ha has been consented on SDAs which equates to around 9.8% of the overall LDP allocation of 60 ha. It should be noted that the Plan provides a higher level of employment land allocations than the identified employment land requirement of 19 ha. The allocations have been made on a range of sites for

different types of investors at sustainable locations across the County, to maximise opportunities for investment and to be flexible to changes in market demand. Therefore it is also useful to note that the amount of employment land granted planning consent in 2019-20, 2020-21 and 2021-22 provides 31.1% of the 19 ha LDP employment land requirement.

# Table 5: Employment Land Consented at Allocated sitessince LDP adoption (in hectares)

	Allocated area	Planning consents since LDP adoption on SDAs
Total	60 ha	5.9 ha

# Spatial Strategy (Strategic Policies PS 1, 3 and 4)

4.3.9 The LDP strategy for allocating land to meet anticipated growth and identified land use requirements is fundamentally focused on bringing forward development on sites that will best address the Plan and SA objectives. There is a particular focus on providing employment growth opportunities, regeneration and delivering good quality accommodation in sustainable cohesive communities, while conserving the County's unique natural heritage, and cultural and historic environments.

- 4.3.10 The distribution of future sustainable growth across the County in the LDP follows a simple settlement hierarchy consisting of the urban area, Key Villages and the countryside. This approach identifies Swansea's urban area as the primary focus for growth and the most sustainable location for major development, reinforcing its position as the main centre for the Swansea Bay City Region. Away from the urban area, small-scale growth is focused on a number of defined key villages. A rural settlement appraisal process identified Key Villages as the most sustainable settlements within the rural area, to accommodate appropriate small scale housing, community facilities and sustainable rural enterprise development.
- 4.3.11 The County's countryside is extensive, within which are numerous hamlets, isolated dwellings, farms and rural enterprises that reflect the nature of the County's rural economy. The countryside is a finite resource and is protected from inappropriate development in the spatial strategy in accordance with national planning policy. It is unlikely that this general spatial strategy will change.
- 4.3.12 In terms of informing new allocations for development, different spatial options (see Figure 6) were tested for distributing the identified growth projections and associated land use requirements for the Plan period, in consultation with the public and stakeholders.

lages r growth	Edge of settlement allocations throughout the County	Edge of settlement allocations, plus limited rural/semi-rural	Sustainable Urban Extensions for residential	
	and county	extensions		
ain centre he urban per of	'Spread Approach'	'Spread Approach - Plus'	'Focussed Approach – Residential'	
sal stainable	4 3 13 The ass	sessment demon	strated that no	

Option 1

#### Figure 6: The LDP Spatial Options

Option 2

4.3.13 The assessment demonstrated that none of the options in isolation would deliver sustainable development. The assessment of options and recommendations for mitigation of negative effects highlighted the need to pursue a combination of approaches to deliver the land use requirements over the Plan period in a sustainable manner.

Option 3

**Option 4** 

Development

'Focussed

Approach – Mixed Use &

Residential'

Strategic

Areas

4.3.14 The LDP allows for the creation of a limited number of sustainable new neighbourhoods at Strategic Development Areas (SDAs), within, or close to the existing urban area which have the greatest potential to contribute to the Plan's Vision and Strategic Objectives and deliver well-being and sustainable development. The size of SDAs presents sufficient scale to enable careful strategic masterplanning to ensure they create sustainable, cohesive, well-designed and quality new places which are delivered through a strong placemaking approach. The economies of scale enable

the level of new infrastructure required to be provided and through careful siting of SDAs.

- 4.3.15 The Strategy also recognises that there is an important need to address the identified housing requirements of all communities in the County. A focus solely on SDAs, by virtue of the appropriate available development opportunities, would lead to an over concentration of development in certain SHPZs. To fulfil housing needs across the County, the SDAs were supported by a limited number of non-strategic medium scale edge of settlement extensions and more dispersed and smaller allocations to round off settlements. These support provision of a mix of housing development across the County where it is needed, including small scale appropriate development to provide Affordable Housing for Local Needs in rural and semirural settlements where the existing character and cohesion of the community will be maintained or improved by development.
- 4.3.16 Whilst it is not anticipated that significant changes will be needed to the overarching Spatial Strategy, the way in which it is delivered will need to be reviewed against changes since the Plan's adoption, including for example the relevant spatial aspects set out in Future Wales.

# Delivery of the Spatial Strategy

- 4.3.17 The LDP spatial strategy is sought to be delivered by the objectives and planning requirements set out in Strategic Policy PS 1 Sustainable Places, and supported by PS 2 and PS 4 that specifically cover housing and employment land respectively. The AMR monitors delivery of these strategies spatially.
- 4.3.18 Indicator 1 has monitored development in the countryside and the monitoring has shown planning consents have been in-line with the policy framework. It is concluded that green wedges and countryside is being protected from inappropriate development and development is being directed towards the most sustainable places within the defined settlement boundaries. The settlement boundary will need to be reviewed for any small changes required to update it for the Replacement LDP.
- 4.3.19 Housing delivery has also been monitored against the different components of housing supply. The findings to date of that monitoring are summarised below.

Table 6: Housing Delivery Since LDP adoption 2019-20 to 2021-22

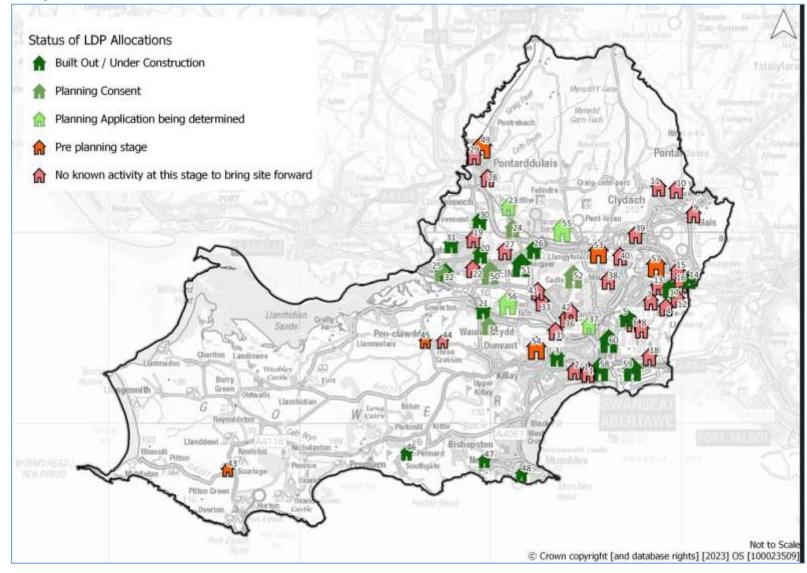
Supply component	New dwellings built since LDP adoption
Allocations	
SDAs	150
H1	378
H5	105
LDP large commitments and large windfall sites	360
Small sites	224
Total	1,217

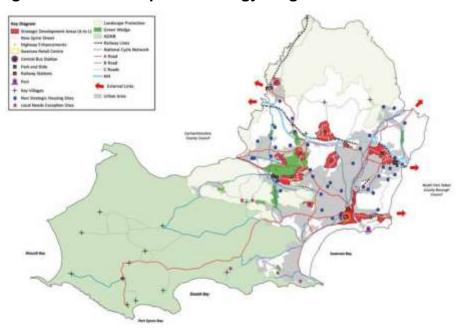
- 4.3.20 Figure 7 illustrates the delivery status of the Plan's allocated sites, showing which have been built, are under construction, or have planning consent. It also shows the sites which have not progressed to planning application stage as of the date of this report.
- 4.3.21 A number of windfall sites have come forward and delivered housing in the period since the Plan was adopted. Furthermore, a number of large windfall sites that have detailed planning consent, totaling in excess of the forecasts in the LDP for annual windfall delivery, are expected to be built in the next 3 years. This suggests that the windfall assumptions adopted in the LDP for large windfall sites are likely to be a conservative underestimate in terms of what will be delivered over the full Plan period. On the basis that further windfall sites will come forward in the later years

of the Plan period in line with this trend, above and beyond the annual rate assumed in the LDP, it is assumed there will be an uplift in supply from this mechanism in future years of the Plan.

4.3.22 Indicator 8 has monitored delivery of new dwellings in the 'Key Villages' defined in the LDP. This shows that 85 have been delivered in the years 2019-22. Opportunities remain on allocated sites for approximately a further 228 new homes in Key Villages. The key villages will need to be reassessed for any changes in status and the need for any potential further sustainable development opportunities to support the Plan strategy.

#### Figure 7: Delivery Status of Allocated sites





#### Figure 8: The LDP Spatial Strategy Diagram

4.3.23 As reported in AMR 3, the overall number of additional dwellings built within the County has fallen below the AAR of 1,040 homes per annum for 3 consecutive years following adoption of the LDP. Combined with the lower levels of housing delivery over the initial years of the Plan period, to meet the LDP housing target of 15,600 new dwellings, an annual build rate of 2,570 new homes will be needed from 2022 to 2025. This level of delivery is unprecedented and would require numerous sites to come forward at the same time. It is therefore now considered unlikely that the LDP housing requirement will be delivered in full during the LDP period.

4.3.24 The failure to deliver the levels of housing growth set out in the plan is due to a variety of factors as set out in AMR 3. There have been highly exceptional circumstances that have influenced the above outcome over the last 2-3 years. In particular, at times within this period dwelling completions have been impacted by the COVID 19 crisis impacting on site operations (closure of sites and social distancing), while labour supply issues, rising costs of materials and extended lead in times due to supply chain problems are also impacting the housebuilding industry<sup>10</sup>. Further factors which have affected the speed in which the allocated residential led SDA sites are coming forward are the requirements to fully incorporate sustainable drainage requirements, and changing ecological legislative requirements. It is important to note that delays in the delivery of housing requirements are being experienced across South Wales (eg. similar has been reported in the Cardiff, Newport, NPT and Bridgend AMRs) and this issue is not confined to Swansea. For example, the latest Cardiff AMR notes that completion

<sup>&</sup>lt;sup>10</sup> Survey of Small and Medium Enterprise housebuilders in the UK (HBF January 2022 press release)

rates are below targets for housing sites in their LDP which was adopted several years before the Swansea LDP.

4.3.25 Significant progress has however been made towards achieving planning permissions and related approvals, to enable developers to commence works on site and deliver the homes required. The LPA has continued to engage closely with the relevant site promoters and developers since the LDP was prepared and adopted, and several SDAs have been brought forward to detailed planning application stages. This close working has ensured that the sites have progressed inline with the detailed placemaking principles and sustainability requirements that are clearly set out in the Development Plan and national policy, and that infrastructure and other measures are secured through complex Section 106 agreements. The close engagement with site promoters and work to progress applications has resulted in some significant achievement including the Reserved Matters (RM) planning application for the first phases of SD B, Land north of Garden Village, (approved in 2021-22) in addition to the detailed approvals obtained for the early phases of site SD C Land south of A240 Penllergaer, in the previous year, and the RM planning application for SD D, Land West of Llangyfelach Road Penderry, which has been approved in 2022-23. A planning application has recently been submitted to the LPA for a significant part of SD H Land North of Waunarlwydd /

Fforestfach,

- 4.3.26 The LPA is continuing to work with the relevant developers and applicants to facilitate the necessary discharge of conditions applications, in order to enable work on the sites with consent to commence swiftly. Construction has commenced in 2022-23 on SD C, and on the basis of discussions with the developers, it is considered likely that required conditions will be discharged enabling work to commence on SD B in 2023-24. Progress is also continuing on bringing forward other SDA sites, with active pre planning engagement to bring forward planning applications on SD sites A, Land South of Glanffrwyd Road, Pontarddulais; SD E Land North of Clasemont Road, Morriston; SD F Land at Cefn Coed Hospital, Tycoch; and the remainder of SD H Land North of Waunarlwydd / Fforestfach.
- 4.3.27 While completions have been lower and slower than expected, it is clear from the ongoing collaborative work being undertaken, and the eagerness of developers to take sites through the planning process, that the Plan-led approach is going to start to successfully drive the delivery of new homes. That said, development of some plan allocations has not progressed as quickly as originally forecasted due to a number of factors, similar to in other parts of South Wales, and despite the efforts of the Council. While many of the sites included in the LDP are considered to

be sound and are progressing, the indicators suggest that overall the housing requirement is not being delivered. The Replacement LDP will need to understand and account for the factors that have contributed to this.

4.3.28 Importantly, though, the review will need to reflect the significant work that has been undertaken by both site promoters and LPA to progress a number of the sites to an advanced stage of the planning process, such that they are well placed to soon deliver homes on site and create excellent examples of new sustainable places, and some further allocated sites may well become commitments in the time period before a Replacement LDP is adopted. The Review will nonetheless provide the opportunity to review the deliverability and viability of existing allocations; while at the same time also consider what other appropriate and sustainable sites could contribute to the housing supply. Any review will also need to take into account the change in evidence of housing requirements since the LDP was adopted. In-line with PPW there must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, which will require an update to the evidence of housing needs. Furthermore, there will need to be a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, RSLs, SMEs and the custom and self-build sector, the opportunity to contribute to delivering of the proposed

housing requirement.

4.3.29 The planning and build status of each allocated site is shown in Appendix 1 of this report. In summary, Table 7 below sets out the current remaining housing supply on allocated sites and others with planning consent.

# Table 7: Snapshot of the Capacity Remaining in theHousing Supply

Supply component	Number of homes
Capacity remaining on allocations:	11,828
H1	2,204
H5	117
SDA	9,507
Capacity remaining on other large sites with planning consent	1,336
Total	13,164

## Source AMR 3 Base Date 1/4/2022

4.3.30 To meet the minimum employment land requirement of 19 hectares, an average take up rate of 2.7 hectares per annum would be expected after LDP adoption. The results from AMR 3 show that since the LDP was adopted, a total of 5.9 hectares of employment land has been permitted on the allocated employment sites. While this is behind the average annual requirement, economic investment and take up is difficult to predict. A range of land remains in the supply ready to accommodate investment opportunities.

Site name	Allocated area	Planning consents since LDP adoption
SD G: Land north of M4 Junction 46	14	2.7
SD H: Land north of Waunarlwydd / Fforestfach	26	0
SD I: Swansea Vale	4	1.89
SD J: Swansea Central Area	4	1.32
SD K: Fabian Way Corridor	12	0
Total	60	5.91

Table 8: Employment Land Consented	(in hectares)	
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- 4.3.31 In addition to the allocation of land at SDAs, the policy framework for economic development includes the safeguarding of existing employment sites for B uses (policies RC 10 and 11). The AMR has found that the policies relating to employment safeguarding are being used appropriately while some appropriate flexibility is being allowed in-line with the policies. However, it may be beneficial to provide further guidance/definition on what constitutes established industrial and commercial land/premises in relation to these policies, since existing employment sites are not identified spatially on the proposals map. Applications for significant office development are being successfully directed to the Central Area in-line with the policy framework (Policy RC 12).
- 4.3.32 Overall, the evidence summarised above demonstrates that progress is being made and the general spatial strategy is largely sound and is adhering to the masterplanning and infrastructure plan approach embedded in the plan. However, the review process provides an opportunity to revisit the most appropriate future levels of growth for the Replacement LDP Plan and to ensure the current spatial strategy remains the most appropriate way of meeting the updated growth requirements. Changes since LDP adoption such as the Future Wales spatial strategy for the area including the identification of the National Growth Area, and requirement to establish a vision for each town and city supported by a spatial framework that guides growth and regeneration; National Sustainable Placemaking Outcomes, PPW updates and the Well-being Plan and corporate priorities will be key inputs.
- 4.3.33 Undelivered allocations will need to be reviewed in-line with national guidance to ensure they remain deliverable and viable and some may not be reallocated unless it can be evidenced that they will come forward within the Replacement Plan period. Candidate sites will need to be assessed for potential allocation where required. Future windfall rates will need to be estimated based on evidence available including undertaking urban capacity and village studies and review of the settlement boundary.

4.3.34 Therefore in addition to the growth strategy needing to be updated, while the existing spatial strategy is considered to be sound, the way in which it is delivered will also need to be reviewed. This again necessitates that the Full Review procedure is adopted since the SFR does not allow for pre-deposit public consultation on the scale and distribution of growth.

# 4.4 Review of Other LDP Topic Areas and Policies

- 4.4.1 This section of the report presents the findings of a review into the monitoring and effectiveness of a wide range of LDP policy and topic areas. These have been reviewed having regard to:
  - Findings of LDP AMRs;
  - Significant contextual changes that have occurred since the Plan's adoption, including changes in national policy and legislation and updates to the evidence base; socio economic factors such as implications arising out of the Covid pandemic; and
  - Internal consultation with relevant specialist officers.
- 4.4.2 This review process is intended to provide an overview of whether a policy is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further

detailed consideration will be given to the need to revise the Plan's policies as part of the Replacement LDP process.

# **Detailed Housing Policies**

# Affordable Housing

- 4.4.3 The Affordable Housing Strategy (Policy H 2) sets a target for the delivery of a minimum 3,310 affordable units over the Plan period through the following measures:
  - Setting targets for on-site provision of affordable housing to be delivered as part of residential proposals where appropriate and viable;
  - Allocating Local Needs Housing Exception Sites, which will deliver local needs affordable housing as a majority proportion of homes on such sites, supported by a minority element of market housing to meet local need; and
  - Providing a policy framework for determining 100% affordable housing exception sites.
- 4.4.4 The policy framework was informed by an Affordable Housing Viability Study and LHMA, both of which will need to be updated as part of the LDP review.
- 4.4.5 Monitoring data indicates that 1,607 affordable units had been built between 2010 2022 which represents

27% of all overall completions over the period. Whilst this is less than the numerical target, it reflects a number of factors affecting housebuilding in general, including the slower than anticipated progress in the strategic housing allocations being delivered.

- 4.4.6 Good progress has been made in delivery of Policy H 5 'Exception Sites' for majority affordable housing. This includes site H5.5 Land at Summerland Lane (completed 61 units), H5.4 Land adjoining Pennard Drive (construction nearing completion with partial occupation - currently 44 of the 70 units are complete), and planning consent granted for H5.6 Land at Higher Lane, Langland (31 units). Two further 'H5 Sites' are at pre planning application stage. Two 100% affordable housing exception sites have been consented since the LDP was adopted, with 41 affordable units at Land off George Manning Way, Gowerton; and 44 at Pencefnarda Farm, Gorseinon; while 20 units consented before LDP adoption have been completed at Land Off Rhydypandy Road & Mynydd Gelli Wastad Road, Morriston.
- 4.4.7 Encouragingly, the allocated strategic sites have secured significant numbers of new affordable homes through the issuing of planning consents for SD B, C and D in-line with the LDP site policies. Therefore affordable housing completions over the coming years are expected to increase significantly.

- 4.4.8 The AMRs have recorded that policy compliant percentages of affordable housing have been provided on non-strategic allocations and windfalls with many 100% schemes delivered in many cases by RSLs. In a limited number of cases some proposals have needed to provide a lower percentage than the target based on viability following detailed viability negotiations with the LPA in-line with the policy framework.
- 4.4.9 The Council has a Council homebuilding programme -More Homes. To date Council homes have been completed at Colliers Way, Parc Yr Helig, Bryn House and Hillview. A number of further More Homes sites are in the pipeline.
- 4.4.10 In the preparation of the Replacement LDP, changes to national planning policy / guidance will need to be taken into consideration. Of particular importance, Future Wales identifies affordable housing provision as a key priority. Policy 7 requires planning authorities to identify sites for affordable housing led developments further to the WG letter, Increasing The Supply of Affordable Homes Through Planning (July 2019), which requires LPAs to allocate them in their LDPs. Future Wales also gives an estimate that of the additional homes needed in the South West Wales Region between 2019-20 to 2023-24, 44% should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Development Plans can be based and will inform

the LHMA update.

- 4.4.11 The Council has commissioned a new LHMA following the new methodology, guidance and tool. This will provide a thorough analysis of housing need data. Preparation of the Replacement LDP will need to consider the most appropriate policy response in the context of the revised housing need identified in the context of the overall housing growth requirement, alongside a thorough updated consideration of viability aspects and a review of potentially suitable sites to contribute towards meeting the demand.
- 4.4.12 The affordable housing policies are largely considered to be working however some changes are required, including the following:
- 4.4.13 It should be clarified that all affordable homes, including those provided through either planning obligations or planning conditions, must meet the new Welsh Development Quality Requirements (WDQR 2021) Creating Beautiful Homes and Places.
- 4.4.14 In light of the changes made by Welsh Government to Acceptable Cost Guidance it will be necessary to clarify the methodology to be used for transferring affordable homes to the Council or nominated RSL.
- 4.4.15 The target percentages and thresholds for triggering affordable housing requirements in Policy H 3 will need

to be reviewed through an updated Viability assessment.

- 4.4.16 Further clarification would be beneficial with regard to the exemption for conversion, demolition or change of use of commercial property.
- 4.4.17 In cases where the target percentage of affordable dwellings to be provided as part of a scheme results in a fraction of a unit, clarification is required that the developer may either round up the dwelling figure to the nearest full unit or round down the dwelling figure and provide the remaining fractional amount as a financial contribution.
- 4.4.18 The H 3 target percentages are based on SHPZs which are comprised of groupings of electoral wards and these SHPZs will need to be reviewed to ensure they remain appropriate and for example in terms of the amendments made to Ward boundaries.
- 4.4.19 A number of allocated H 5 sites have been delivered, and further sites will become commitments with planning consent. Sites that have not been progressed will be reassessed in-line with the Development Plans Manual. Candidate sites will be considered for appropriate majority affordable housing sites.
- 4.4.20 In the case of development proposals for 100% affordable homes on Affordable Housing Exception

sites (as defined in LDP Policy H 6), clarification is required that the Council will not typically allow the affordable homes to be intermediate tenures that would permit occupiers to staircase to full ownership of the home. The only exception to this will be instances where the applicant has demonstrated to the satisfaction of the Council that secure arrangements will be in place to guarantee the relevant home(s) will, upon re-sales, always be sold or let as affordable housing. National planning policy is clear that affordable housing exception sites are not appropriate for market housing.

## **Gypsy and Traveller Accommodation**

- 4.4.21 The LDP includes a criteria based Policy H 7 for determining proposals for new, and extensions to existing, Gypsy and Traveller sites. This policy was informed by Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites.
- 4.4.22 The LDP does not currently allocate land for new Gypsy and Traveller site provision on the basis of the assessed need (evidenced by the Gypsy Traveller Accommodation Assessment (GTAA) 2015) and the land available with lawful use to accommodate it when the LDP was adopted. The LDP AMR 3 has identified that the seven additional pitches which were planned to be built to accommodate the immediate unmet need by the end of 2021 at Pant y Blawd Road have not yet commenced, therefore breaching the trigger point of

the monitoring indicator.

4.4.23 Future Wales has identified that the future SDP for the region should identify the Gypsy and Traveller need for pitches. However, the SDP will likely not be in place ahead of the Replacement LDP being adopted. Therefore, as part of the preparation of the Replacement LDP, a review will need to be undertaken regarding the latest need position for additional pitches in Swansea (which will be identified from the most up to date GTAA), and the available land with lawful use that can accommodate that need within the timescales required.

# Houses in Multiple Occupation (HMOs)

- 4.4.24 LDP Policy H 9 on HMOs defines specific thresholds, above which further concentrations of HMOs will normally be deemed a harmful concentration. The thresholds were identified based on an understanding of current HMO concentrations, likely future demand, current HMO supply, and other available evidence. Supplementary Planning Guidance was adopted in December 2019 to support the policy.
- 4.4.25 The LDP AMR has monitored the concentration of HMOs within the HMO Management Area which is defined on the Proposals Map. Each AMR has concluded that the concentration of HMOs in this designated area has not varied significantly from the

baseline. The policy is generally considered to be operating as intended. However, it will be necessary to review this, along with the supporting SPG, for example with regard to assessing any changes in HMO concentrations in areas outside of the Management Area, and for any useful minor alterations or clarification to the policy text that would be appropriate.

#### **Purpose Built Student Accommodation (PBSA)**

- 4.4.26 Higher Education makes an important contribution to the local economy. LDP policy H 11 requires PBSA to, in the first instance, assess the availability and suitability of potential sites and premises within the Central Area defined on the LDP Proposals Map. It identifies that it is preferable that student needs are met as far as possible by modern purpose built and managed schemes with the space and facilities more suited to students' needs in appropriate Swansea Central Area locations where there is good access to services, facilities and public transport to the University buildings. Such development has the potential to increase footfall, and so contribute towards enhancement of City Centre vitality and viability. Supplementary Planning Guidance was adopted in December 2019 to support the policy.
- 4.4.27 Several significant schemes have been completed in the Central Area since Plan adoption including Coppergate, 17-18 The Kingsway, 307 bedspaces;

Former Oldway Centre, Orchard Street, 556 bedspaces; and Mariner Street, 780 bedspaces.

4.4.28 The AMR does not routinely monitor planning consents for PBSA against the policy H 11 criteria, and this could be a useful addition to the monitoring framework. However, delivery has been monitored separately and the policy is generally considered to be operating as intended with the majority of new PBSA developments being guided to Central Area sites. Nonetheless the policy will be reviewed to ensure it remains appropriate and up to date.

# Other detailed housing policies

- 4.4.29 The LDP also contains policies on Ancillary Residential Development (Policy H 8) and Specialist Housing (Policy H 10). These policies are not routinely monitored through the AMR but will be reviewed in the preparation of the Replacement LDP with Development Management colleagues to ensure they are operating successfully and remain appropriate and up to date. In the preparation of the RLDP, it will also be reviewed whether any additional policies are required, for example, if any new models of housing delivery are not already adequately covered by existing policies.
- 4.4.30 A further important factor that will need to be taken into account in the Replacement LDP is the prevalence of second homes and short-term holiday lets in any local

areas in-line with proposed amendments to PPW summarised in Chapter 2 of this report.

4.4.31 The Replacement LDP will also consider if there are any gaps in the existing policy coverage in order to effectively determine the types of planning applications coming forward such as large scale multiple occupancy flat schemes with shared ancillary community facilities.

#### **Regeneration and Commercial Development**

- 4.4.32 LDP Policy RC 1 recognises that the regeneration of Swansea Central Area is a corporate priority of the Council and is at the heart of efforts to drive forward the economy of the whole of the Swansea Bay City Region. This remains relevant as a fundamental Corporate priority.
- 4.4.33 Policies RC 2 to RC 8 set out the retail and associated uses hierarchy and policies of the Plan. Future Wales reiterates the long established principle of a Town Centres First approach. It states that significant new commercial, retail, education, health, leisure, and public services facilities must be located within town and city centres and that a sequential approach must be used to inform the identification of the best location for these developments and they should be identified in LDPs. It is for the LPA to determine what constitutes a development of a significant scale. It also places a driver on making town centres multi-functional places.

Policy 2 of Future Wales states that LDPs should establish a vision for each town and city supported by a spatial framework that guides growth and regeneration. Set against these national policy aspirations is the implications of the new TAN 15, having regard to the areas affected by flood risk throughout the Swansea central Area. This updated national policy context will need to be reflected upon in a holistic manner in the preparation of the Replacement LDP.

- 4.4.34 The Swansea Retail and Leisure Study (2015) forms the evidence base for the existing policies and will need to be updated for the Replacement LDP. The updated study will help inform the Replacement LDP in terms of retail strategy and policies. Consideration will also need to be undertaken in response to the challenges faced by many retail centres in order to inform the merits or otherwise of how future LDP policy can respond most effectively.
- 4.4.35 The Central Area and all retail centre boundaries will need to be reviewed to ensure they remain appropriate and up to date.
- 4.4.36 The policies are largely considered to be working effectively but will need to be reviewed in light of Future Wales and PPW, Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (July 2020), and the updated evidence base and review of retail

centres.

#### **Policy PS 2 Placemaking and Place Management**

- 4.4.37 Placemaking is at the heart of the LDP and the Council's strategic planning agenda which has since been introduced into national policy through Future Wales and PPW.
- 4.4.38 LDP policy PS 2 sets out that development should enhance the quality of places and spaces, and respond positively to aspects of local context and character that contribute towards a sense of place; and lists placemaking criteria for developments to achieve. To assist in delivering the placemaking agenda the Council have adopted a number of Placemaking for Residential Development SPGs to show how key placemaking objectives and policy requirements set out in the LDP and national policy can be integrated into proposals. These have been prepared to guide different types and scales of development including, householder development, infill and backland residential development, large scale residential proposals, and proposals in the Gower Area of Outstanding Natural Beauty (AONB). These have been developed in the context of recent placemaking updates to PPW and to reflect the recent Future Wales publication and the identified Strategic Placemaking principles.
- 4.4.39 The LDP policies and the supporting SPG are considered to be working effectively in driving national objectives for placemaking in Swansea. The conclusions from the AMRs indicates that SDA sites are being progressed in line with site masterplans and placemaking principles.
- 4.4.40 Nevertheless, in line with the recent updates to PPW the wording of Policy PS 2 will be reviewed to ensure it fully reflects the PPW National Sustainable Placemaking Outcomes which will be key to informing the preparation of development plans going forward and the Strategic Placemaking principles set out in Future Wales.

## SDA's – Strategic Development / Masterplanning

- 4.4.41 LDP policy SD 1 identifies Strategic Development Areas (SDAs) allocated at 12 locations to provide new homes and opportunities for job creation and commercial investment at a strategic scale. Each site has its own strategic policy SD A to SD L setting out placemaking principles and development requirements supported by more detailed development requirements in appendix 3, while general masterplanning and placemaking principles for SDA are included in policy SD 2.
- 4.4.42 Some of these SDAs now have planning consent and so the LDP will need to be amended to reflect that

some of the sites will be commitments in the Replacement LDP. The planning status of all currently allocated sites is set out in Appendix 1.

- 4.4.43 As noted earlier in this report, all remaining existing allocations will be reviewed in-line with national guidance in order to inform whether they will be allocated in the Replacement LDP and incorporate any refinements required to the concept plans and policies in order to reflect the evolution of the sites based on up to date deliverability and viability evidence and the spatial and growth strategy of the Plan.
- 4.4.44 The AMRs have noted that the SDAs which have achieved planning consent have come forward in-line with the masterplanning, placemaking and sustainability principles of the Plan. The policies and concept plans approach are considered to be working effectively, but will need to be reviewed in order to ensure they remain up to date with regard to the latest deliverability and viability evidence.

## ER 1 and ER2 – Ecosystems and Resilience

4.4.45 Policy ER 1 sets the policy framework to ensure that all development is resilient to, and mitigates against, the effects of climate change. This is a corporate priority, and is emphasised in the Council's declaration of emergency in relation to both climate and nature.

- 4.4.46 In 2019 the Welsh Government declared a climate emergency in order to co-ordinate action nationally and locally to help combat the threats of climate change. Climate change is highlighted as a main challenge within Future Wales as increasing temperatures and extreme weather events caused by climate change are putting pressure on ecosystems, infrastructure, built environment, landscape and cultural heritage, which all contribute to social, economic and ecological resilience. Climate change is an equality issue as it will disproportionately affect the most vulnerable communities in Wales and the wider world.
- 4.4.47 Future Wales emphasises that the pressure on water resources will likely increase due to climate change and the availability, supply and management of water will be of increasing importance, as will the location of development and the safeguarding of resources.
- 4.4.48 Policy 8 of Future Wales seeks to ensure flood risk management due to climate change is managed, whilst policy 9 seeks to ensure that ecological networks are safeguarded and created in order to allow adaptation due to climate change.
- 4.4.49 PPW emphasises how the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources (para

3.30). Furthermore, the planning system must make sure the right developments are built in the right places.

- 4.4.50 Policy ER 2 ensures that development maintains and enhances the county's GI network. The Council has adopted a GI strategy for the Central Area and there is an emerging county strategy.
- 4.4.51 Both Future Wales and PPW require development plans to undertake a GI Assessment and to include policies for its safeguarding and to identify opportunities where existing and potential GI could be maximised. These Assessments can help develop a robust approach to enhancing biodiversity, increasing ecological resilience and improving well-being outcomes, as well as identifying key strategic opportunities for restoring, maintaining, creating and connecting key green infrastructure features. Area Statements (together with other sources of information, such as the Local Nature Recovery Action Plan; and the Ecosystem Resilience Report) can inform this assessment process, and improve the resilience of the built environment, by identifying opportunities to use nature-based solutions that address local issues such as mitigating the impact of climate change, flood risk or air pollution, or improving availability/accessibility of green space. The evidence will inform wider placemaking issues with regard to site selection and development.
- 4.4.52 The Replacement LDP will need to consider how to incorporate GI policies which clearly emphasise the cross cutting nature and need for multi-functionality for example in respect of biodiversity and geodiversity, open space, flood risk alleviation, drainage, active travel, landscape, health and wellbeing, and placemaking.
- 4.4.53 Biodiversity policy within Future Wales (Policy 9) and PPW embodies a strengthening of the role and importance of biodiversity and ecosystem resilience within the planning system, following on from the Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities requiring them to seek to maintain and enhance biodiversity and ecosystem resilience in the exercise of all their functions. The emphasis on placemaking within PPW is also relevant in respect of complying with this duty.
- 4.4.54 Guidance on securing biodiversity enhancements was issued in 2019 and further clarification on the issue is anticipated in the next iteration of PPW, which may require amendments to LDP policy or related SPG.
- 4.4.55 The adopted Biodiversity SPG and Trees SPG provide detailed guidance on the implementation of national policy, and the suite of detailed LDP policies (ER6, ER8, ER9 and ER11).

- 4.4.56 The policy framework will be reflected in the Replacement LDP site allocations. Having particular regard to local ecological designations (Sites of Importance for Nature Conservation (SINCs)) and the Ecosystem Resilience Report, which form part of the ecosystem resilience of the county. The Replacement LDP process will need to be informed by an ecological survey of unimplemented LDP allocations and appropriate levels of information to inform potential new allocations to provide the most up to date information to inform implementation of the stepwise process advocated in PPW, TAN 6, LDP Policy and Biodiversity SPG to LDP site selection.
- 4.4.57 Policies ER 6, 8 and 9 need to be reviewed in order to reflect changes in terminology introduced in 2019 by the Conservation of Habitats and Species Regulations 2017 (as amended) (known as the 2019 Regulations) as a result of the UK's withdrawal from the European Union and the Natura 2000 site network.
- 4.4.58 While they are unlikely to be amended significantly, ER
  3: Green Wedges will need to be reviewed as part of the development plan review process (PPW para 3.64) to ensure they remain appropriate and only designated where there is demonstrable need to protect the urban form and where alternative policy mechanisms such as settlement boundaries would not be sufficiently robust.
- 4.4.59 Future Wales policies 19 and 30 state that Green Belts

must be identified via Strategic Development plans rather than LDPs therefore it will not be appropriate based on current guidance for a green belt to be considered.

- 4.4.60 In regard to Policy ER4, the need for a LVA or LVIA and Colour Impact Assessment to accompany applications within the Gower AONB (where a case officer considers necessary) needs to be made explicit within the policy. Furthermore the policy should be linked to the revised Placemaking Guidance for the Gower AONB SPG.
- 4.4.61 Policy ER 5 Landscape Protection relates to Special Landscape Areas (SLAs) - non-statutory designations that define local areas of high landscape importance, which may be unique, exceptional or distinctive to the area. Planning authorities should apply these designations where there is good reason to believe that normal planning policies cannot provide the necessary protection. The extent of SLA designations will be reassessed for the Replacement LDP to ensure it remains the most appropriate and the area covered requires additional protection.
- 4.4.62 Policy ER7 Undeveloped Coast needs to be reviewed having regard to PPW (section 6.5), which states that development should normally seek to avoid coastal locations, unless it needs to be on the coast. Development plans may identify areas likely to be

suitable for development as well as those subject to significant constraints and be unsuitable for development. Areas subject to constraints or considered unsuitable for development may include those where:

- conservation or enhancement of the natural and historic environment requires development to be limited;
- visual intrusion and inter-visibility between land and sea will need to be carefully considered;
- there are specific policies to be pursued in Heritage Coast areas;
- · access to coastal paths should be protected; and
- there may be risks of erosion, flooding or land instability.
- 4.4.63 Policy ER 7 needs to be revised to include reference to the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment, 2017 and the Placemaking Guidance for the Gower AONB SPG. The Seascape Character Assessment does not define a "coastal zone" with an inland boundary for planning policy purposes as inter-visibility often extends for many miles inland a defined 'coastal zone'. However, the extent of coastal landscape character (such as cliffs, dunes, salt marsh) is defined spatially in the study. The inter-visibility mapping provides an additional but separate 'setting' layer which can aid the seascape impact assessment of planning applications.

Reference to seascape impact assessments accompanying planning applications when considered necessary needs to be included within policy ER 7.

- 4.4.64 Policy ER 10 relating to Geological Sites needs to be reviewed having regard to PPW (section 6.3) which states that Geological features are a key part of our natural environment, and protecting geodiversity underpins the wider protection and management of our natural resources, including land availability, renewable energy potential, groundwater supply and flood risk. Regionally Important Geodiversity Sites (RIGS) are non-statutory site designations that recognise locally or regionally important geological and geomorphological landscape features. RIGS are selected for their educational, scientific, historic and aesthetic qualities, to and designated through development plans. The LDP should protect the features and qualities for which RIGS have been designated, and are encouraged to promote opportunities for the incorporation of geological features within the design of development, particularly where relevant evidence is provided by GI Assessments.
- 4.4.65 Policy ER 10 should be reviewed in order to ensure all the designated RIGS are identified and the link to the inclusion of geodiversity within GI Assessments, where appropriate, is strengthened.

## IO 1 –Infrastructure / Planning Obligations

- 4.4.66 Planning Obligations, seeks to ensure that new development is accompanied by an appropriate level of infrastructure, facilities, services and related works where they are necessary to make the development acceptable. Contributions are secured through the use of planning obligations, as set out in Section 106 of the Town and Country Planning Act 1990, or through the use of planning conditions.
- 4.4.67 Planning obligations seek contributions from developers to enhance the quality of a development, provide community benefits and infrastructure, and mitigate any negative impacts that may arise as a consequence of the development.
- 4.4.68 LDP Policy IO 1 is considered to be working effectively and contributions are being received (subject to viability considerations) to mitigate the impacts of new development and help provide necessary infrastructure such as recreation and open space, community and educational facilities. However, there are areas of clarification required on particular topics due to the supporting Section 106 SPG being out of date. Therefore a thorough review of the elements that need to be updated will be undertaken and where appropriate incorporated through the Replacement LDP policies and by developing a new Section 106 SPG in tandem.
- 4.4.69 The evidence base which informed the formulation of these policies will be reviewed as part of the process. The Infrastructure Delivery Plan (IDP) identified the level of infrastructure that will be provided and required over the Plan period. As part of the Replacement LDP process, an updated assessment of infrastructure provision and needs will be undertaken to identify the capacity and availability of existing and planned infrastructure. There will be a need to work closely with utility providers to have regard to their most recent plans for improvement and the availability of funding so that infrastructure and development are aligned. The Replacement LDP strategy will need to reflect the availability of existing and planned infrastructure.
- 4.4.70 Infrastructure directly relates to a number of placemaking principles identified in the revised PPW. Both PPW and FW now place more of a focus on new types of infrastructure, such as electric vehicle charging infrastructure, digital infrastructure, mobile telecommunications and GI, all of which will need to be considered during the review.
- 4.4.71 Updated high level viability testing is required to inform the review of the planning obligations policy and to evidence whether the requirements and targets within the Plan should be amended. A Regional Viability Model for the Region has been developed to create a consistent methodological approach when setting

targets and undertaking site specific viability assessments. The viability analysis will need to reflect the challenging circumstances currently facing developers in terms of increasing materials costs, placemaking requirements, and the introduction of new sustainable drainage and biodiversity requirements since the LDP was adopted including on costs and land take.

#### SI1 – Health and Well-being

4.4.72 Health is a principle element embedded within the Well-being of Future Generations Act which places an emphasis on taking a holistic, long term and collaborative approach to achieving well-being through placemaking. One of the seven goals is to achieve a healthier Wales, whilst another is a more equal Wales, which both have direct links to public health, equality, health care and services. The new theme of placemaking and sustainable places in PPW are relevant to this topic area and improved health is one of the objectives of Future Wales. Health and well-being is therefore presented as a key objective in WG policy. PPW recognises that HIA can make an important contribution to plan making and the recognition that evidence to health impacts (on physical and mental health) can help the planning system to develop stronger and more coherent approaches towards maximising health and well being. Consideration of the necessity for a HIA will be considered as part of LDP

review. The LPA will have regard to any regulations and guidance in respect of HIA as part of the assessment processes associated with the LDP.

4.4.73 Strategic Policy SI 1 is the overarching policy for Health and Well being which aims to reduce health inequalities and encourage healthy lifestyles. It recognises the importance of creating sustainable places that give people the opportunity to live healthy lifestyles. However, given the overarching placemaking approach adopted in Swansea, the promotion of health and well being is integrated through various policies. It is currently therefore underused as a standalone policy as the criteria is addressed within the suite of placemaking policies. Therefore, health and well-being will be an overarching consideration that will have overriding influence throughout the Replacement LDP. However, the review will need to consider whether it should remain as a stand alone overarching policy or whether it should be amalgamated under a new overarching theme of sustainable placemaking and interwoven throughout policies, incorporating the concept of 'Health in All Policies' (HiAP). The LDP goes some way to achieve this, with policies relating to air, noise and light pollution, land contamination, transport, all relating to public health impacts. Consideration will be given whether the potential implications on physical and mental health implications due to development should be given greater emphasis in policies within the Replacement LDP.

### SI 5 / 6 Protection / Provision of Open Space

- 4.4.74 The LDP includes policies in relation to the protection of and the provision of new public open space (Policies SI 5 and SI 6). The policies together require the protection of existing public open spaces and includes a requirement for the provision of new open space on planning applications for new housing proposals for ten dwellings or more. These policies deliver key benefits for health and well-being.
- 4.4.75 An assessment of existing public open space provision including deficiencies by area is set out on the Open Space Assessment (OSA). This provides the evidence base with which to assess the need for open space provision within areas of Swansea as part of development. The OSA is currently in the process of being reviewed to ensure it will be up to date to inform the Replacement LDP. Similarly, an updated Planning Obligations SPG and GI SPG will be prepared in tandem with the Replacement LDP which will include more detailed guidance on securing open space provision on new development.
- 4.4.76 The findings of the AMR's (indicators 76, 77) indicates that Policies SI 5 and SI 6 are being implemented effectively in terms of ensuring there is no deficiency of open space as a result of new development. The policies will therefore be retained albeit the wording will

be reviewed to inform the Replacement LDP.

#### Policy HC1 – Historic and Cultural Environment

#### Welsh Language

- 4.4.77 A Wales of vibrant culture and thriving Welsh language is one of the seven well-being goals identified in the Well-being of Future Generations Act, which is also embedded in PPW and the sustainable placemaking principles. The importance of the Welsh Language is also highlighted by the Welsh Government's ambitious target to achieve one million Welsh speakers by the year 2050.
- 4.4.78 For the most part, the evidence base is unlikely to have changed significantly, but a review of the latest statistical data (the Census) will be needed to determine whether there will be any need to amend the extent of the designated Welsh Language Sensitive Area (WLSA), and a review of the boundary to take account of changes to Ward boundaries; and consideration of whether the policy thresholds require revision.
- 4.4.79 No specific issues have been identified in the AMR in respect of the operation of the LDP policies for the Welsh language. In general, the policy appears to be working well. However, the AMR has identified that Policy HC3: requires clarification when a WLIA or

WLAP will be required as part of submitted proposals.

4.4.80 Welsh Language Impact will need to be considered as an important component of the Integrated Sustainability Appraisal for the Replacement LDP.

#### Heritage

- 4.4.81 For the most part, the built and historic environment is unlikely to have changed significantly in respect of the evidence base, but areas that may require updating include the Schedule of Buildings of Local Importance (to take into account losses and possible additions) and the recent Conservation Area Appraisals.
- 4.4.82 No specific issues were identified in the AMR in respect of the operation of the LDP policies for the Built Environment and Historic Heritage. Issues that may need to be considered as part of the review include changing the terminology used to bring it in line with the latest guidance (e.g. Historic Environment rather than Historic Heritage and Historic Assets of Special Local Interest rather than Buildings of Local Importance).

## CV 1-5 - Countryside and Village Development

4.4.83 The LDP sets out a number of policies to facilitate appropriate development outside of the main urban area whilst at the same time seeking to protect the integrity of the countryside and quality of the surrounding landscape in these areas. These include Policy CV1 Key Villages which sets out settlement boundaries for 18 key villages which are considered suitable for accommodating small scale development to deliver appropriate housing, community facilities and sustainable rural enterprises for these villages. The LDP seeks to ensure protection of the countryside for the economic, social and environmental benefits provided.

- 4.4.84 Policy CV2 Development in the Countryside seeks to protect the countryside from inappropriate development and ensure that only in exceptional circumstances outside of defined settlement boundaries development will be acceptable. It sets out acceptable exceptions with the overarching principle seeking to create more sustainable rural communities.
- 4.4.85 Policy CV 3 Replacement Dwellings in the Countryside seeks to retain rural dwellings that make a positive contribution to the County's rural character and allows for the replacement of non descript or poorly designed rural dwellings with better designed dwellings that enhance the appearance of the countryside.
- 4.4.86 Policy CV 4 Conversion of Rural Buildings seeks to strictly control the conversion of traditional rural buildings to ensure that proposals contributes to a more sustainable economy and does not detract from

the special qualities of the County's countryside.

- 4.4.87 Finally, Policy CV 5 Farm Diversification recognises national policy and guidance that many economic activities can be sustainably located on farms and support farm diversification provided such schemes are small scale and integrate well with surrounding countryside. The policy sets out detailed criteria with which such schemes will be judged.
- 4.4.88 Future Wales includes Policies 4 and 5 which sets out the WG objectives to support sustainable and vibrant rural communities and supports appropriate and proportionate growth in rural towns. The Replacement LDP will need to identify the rural communities, assess needs and set out policies that support them. Policies will need to consider how age balanced communities can be achieved, where depopulation could be reversed and consider the role of new and market housing, employment opportunities and local services and greater mobility in tackling these challenges.
- 4.4.89 Further, in line with these policies the Replacement LDP must plan positively to meet the employment needs of rural areas including employment arising from foundational economy, agricultural and forestry sector, including proposals for diversification, start ups and micro businesses. WG strongly supports the development of innovative and emerging technology businesses and sectors to help rural areas unlock their

full potential. PPW reinforces placemaking in rural areas and rural policies will need to fully reflect these aspirations. Similarly, PPW is clear that the Replacement LDP will need to plan positively to meet rural employment needs by identifying policies in the LDP and where a need is identified allocate new rural sites for economic development however where these are required these are likely to be small and generally be located adjacent to defined settlement boundaries preferably where there is public transport provision. Further the plan will need to include criteria based policies to consider proposals outside settlement boundaries. Meeting rural employment needs will need to be considered as part of the Employment Land Review to support the Replacement LDP.

4.4.90 The AMR's produced since Plan adoption indicate that the policies have been successful in facilitating appropriate development within the key villages and limiting development in the countryside to exceptional circumstances. Aside from acceptable householder development this has included facilitating agricultural development, tourism related development and replacement dwellings. However, it has been identified that a number of the policies can be strengthened and supported with additional clarification in particular CV2 and CV4. Policies will need to fully reflect Future Wales aspirations above.

4.4.91 Similarly, the Replacement LDP will need to be

informed by a new key villages assessment as part of the work to inform the preparation of the Preferred Strategy. The Council will need to undertake a comprehensive review of settlement boundaries as part of this work and to reflect necessary changes to boundaries as a result of new planning permissions.

#### **TR1 – Tourism and Recreation Development**

- 4.4.92 PPW recognises that the role of tourism is vital to economic prosperity and job creation in parts of Wales, and requires plans to provide a framework to maintain and develop well-located, good quality tourism facilities. Future Wales identified tourism as a potential growth area for the South West Wales region, and supports high quality development across the region to ensure all communities are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to grow their economies.
- 4.4.93 Welsh Government introduced a package of measures in 2022 in order address the issues of second homes and holiday lets in Wales. This includes introducing three new planning use classes – a primary home, a second home and short-term holiday accommodation. LPAs, where they have evidence, are now able to make amendments to the planning system to require planning permission for change of use from one class to another, where evidence shows that the number of holiday homes/second homes in an area is a

contributing factor to a range of issues, such as lack of affordable housing, poor community cohesion etc. National planning policy is also being amended to give local authorities the ability to control the number of second homes and holiday lets in any community. As a result of the new legislation, research and evidence must be gathered to make an informed decision on whether greater planning controls are desirable on second homes and holiday homes in any part of the County.

- 4.4.94 Policy TR1 also links to the Marine Plan, especially with regard on potential impacts on Seascape. The Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment is an important evidence base for consideration of development on the undeveloped and developed coasts of the County. Para 6.58 PPW 11, highlights that Area Statements and other locally based plans for coastal areas provide relevant information on how the economic potential of the coast may be unlocked in a sustainable manner, and how undeveloped coastal areas should be protected from development.
- 4.4.95 Since the LDP was adopted, the range and type of buildings and holiday accommodation units being developed has increased significantly, and many are not addressed specifically within the LDP. As a result, the AMRs have identified that some LDP policies require clarification in relation to types of tourism

accommodation, with regard to the definitions and within the glossary.

- 4.4.96 Further clarification on the contents of a TNDIA is also required, as many applications are accompanied by statistics but no information on the proposed development itself to demonstrate that it is an economically viable, sustainable long term business that will contribute to the rural economy.
- 4.4.97 PPW 5.5.2 states that in some places there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors. Specific areas of the County continue to face pressure for increased development, particularly tourism accommodation development. Baseline evidence and data will need to be examined in order to aid a review of tourism policies to determine whether the County, or specific areas of the County, have sufficient capacity to accommodate additional tourism developments.
- 4.4.98 An important piece of evidence base which influenced the LDP with regard to caravan and camping within the AONB is the Gower AONB Landscape Sensitivity and Capacity Study for caravan and campsites. This piece of background evidence is currently being updated in order to take account of newer forms of tourism accommodation (such as pods and yurts) and to see if any landscape changes have occurred since the first Study as a result of increased development. This will

provide an up to date assessment for the Replacement LDP.

- 4.4.99 The LDP is based on evidence of bedspace numbers and accommodation types, which demonstrated a shortage of holiday accommodation that was genuinely available for short-term holiday lets, rather than as a private second home/holiday home which is not sub-let. The AMRs demonstrate that a considerable number of new short-term let bedspaces for holiday accommodation have been created throughout the County since LDP adoption. As a consequence the underlying data and evidence require updating to assess whether the policies still address key issues identified.
- 4.4.100 The Gower AONB Management Plan is currently being reviewed and this will help inform future development within the AONB.
- 4.4.101 As well as addressing the availability of accommodation, the Replacement LDP will need to also examine the development of leisure facilities. Current LDP policies support the development of new leisure uses, within the city centre and waterfront areas and within the countryside where appropriate. Very few such developments have come forward within the lifetime of the LDP, with the exception for example of the Arena, the majority of applications being for accommodation, and policies should be

reviewed to determine whether they sufficiently facilitate developers to bring forward schemes.

# EU1 - Energy and Utilities

- 4.4.102 The LDP contains a number of policies to facilitate renewable and low carbon energy development. Policy EU 1 sets out criteria for consideration of such schemes within Strategic Search Areas and Local Search Areas, Policy EU2 sets out that larger residential and non residential schemes will need to be supported by a comprehensive Energy Assessment, Policy EU 3 seeks to ensure that significant energy consuming developments facilitate the development of District Heating Networks. In respect of Utilities Policy EU4 seeks to ensure adequate utility infrastructure is in place to serve developments, with developers contributing to secure improvements where there are deficiencies. Policy EU5 sets out how proposals for telecommunications and digital technology will be assessed.
- 4.4.103 To inform the policies in the LDP the Council undertook a Renewable Energy Assessment (REA) in 2018 which evaluated the potential energy capacity of renewable and low carbon technologies in the County. This evidence base will need to be updated to inform the Replacement LDP.
- 4.4.104 Future Wales sets out that by 2040 it seeks a Wales

where people live in *places which are decarbonised and climate resilient.* It sets out the policy framework for determination of renewable energy proposals including the introduction of Priority Areas within which there will be a presumption in favour of wind and solar schemes. Policies 16 and 17 sets out Welsh Government strong support for developing renewable and low carbon energy from all technologies at all scales and to facilitate District Heat Networks within Priority Areas.

- 4.4.105 TAN 8 was revoked following the publication of Future Wales. The north eastern part of the County is within the Future Wales defined Pre Assessed area for wind where there is a presumption in favour of large scale wind-energy development (including repowering) in these areas subject to criteria. Swansea is also identified as a District Heat Network priority Area, within which planning authorities should identify opportunities for District Heat Networks and plan positively for their implementation.
- 4.4.106 PPW set out the Energy hierarchy and will expect all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning. It sets out a number of issues to be considered when preparing the Replacement LDP:
  - consider including policies that require major applications to be accompanied by an Energy Report

- identify strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon in the development plan
- seek to maximise the potential of renewable energy by linking the development plan with other local authority strategies
- Using Local Area Energy Plans or other evidence to set challenging but achievable targets for renewable energy in development plans considering the renewable energy resource they have available
- Consider the energy needs of site allocation development proposals in collaboration with grid operators
- In order to facilitate local and regional energy planning local authorities must develop an evidence base (which can include a LAEP) to inform development of renewable and low energy policies
- Development plans should support opportunities for heat networks, local renewable and low carbon energy generation schemes, and the co location of new proposals and land allocations with existing developments, heat suppliers and heat users.
- PPW introduces the Energy Hierarchy and requires planning authorities to plan positively for local power generation including providing for the co-location of developments to enable local heat opportunities, maximising the use of waste heat, district heating and combined heat and power.

- Assess the opportunities for low carbon energy in the area and use the evidence to establish spatial policies in the development plan which identify the most appropriate locations for development of energy development below 10Mw and include policies with the criteria for development outside identified areas will be determined.
- 4.4.107 The policy framework, evidence base and documents for this topic will need to be reconsidered and revisited in the light of changes to national policy and consenting regimes and changes in renewable energy technologies. All proposals for onshore generating projects between 10MW and 350MW capacity are now dealt with by Welsh Ministers with Local Authorities determining only those proposals below an installed capacity of 10MW. As a result of new national policy above, Policy EU 1 will need to be amended to reflect the Future Wales Pre Assessed areas for large scale wind at national level and to identify the most appropriate locations for development of energy developments below 10MW. Similarly with the requirement for heat networks now forming part of Future Wales policy, it may not be necessary to include the current policy EU 3. The current policies focus on solar, wind and District Heating Networks. Consideration will be given to the need to provide advice on facilitating domestic renewable energy technologies which are generally covered under permitted development.

4.4.108 Furthermore, the Welsh Government clarified (March 2022) that where the site area of a proposed solar PV array development includes areas of Best Most Valuable (BMV) agricultural land, considerable weight should be given to protecting BMV land from development, because of its special importance, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission. This should be clarified within policy EU 1 of the Replacement LDP.

4.4.109 Overall the AMR's produced since plan adoption indicate that the policies have been successful in facilitating an increase in renewable energy capacity within the County in line with EU 1. To date however no district heating networks, either stand alone or as part of a proposed development have been delivered. However, increasing capacity is reliant on developers bringing such schemes forward.

## T 1 – Transport, Movement and Connectivity

4.4.110 The LDP contains a strategic policy on Transport Measures and Infrastructure which takes a coherent approach to land use and transport planning. It emphasises that movement, connectivity and legibility of transport links are critical components in the creation of a successful place and an efficient transport network (including the highway, public transport, pedestrian and cycle routes, PROWs including bridleway routes) is critical to support economic growth.

- 4.4.111 The LDP supports the delivery of sustainable transport infrastructure which is a key objective for Welsh Government. The "Transport Hierarchy for Planning" as set out in Future Wales already forms the basis for the LDP Policies on transport. In order to reduce the reliance on car use development must firstly consider providing new and upgraded Active Travel routes. Principally by means of improving connectivity and developments taking opportunities to enhance walking and cycling access by incorporating new routes within development sites, and/or making financial contributions towards the delivery off-site of appropriate measures. The provision and improvement of public transport is a key aim of the Plan enabling sustainable travel choices. The plan seeks to maximise the potential of movement to/from development by public transport, including ensuring developments within the urban area are located at a walkable distance to a public transport access point on a route with a high frequency service.
- 4.4.112 Developments are required to deliver new transport infrastructure and improvement measures that are required to mitigate the impact of the development, and ensure they are served by appropriate parking

provision and circulation areas. Development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted.

- 4.4.113 A Strategic Transport Study was undertaken to consider the impact of LDP development proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals and identified measures considered important as part of a joined up approach to land use and transport planning. This Assessment was important in providing a thorough assessment of the likely impact of the Plan's strategy for growth and proposing some of the mitigating measures that may be required. The Assessment will need to be updated to reflect the development proposals of the Replacement LDP.
- 4.4.114 Other specific policies in this chapter of the LDP support the provision of identified strategic bus based service corridors across the city within proposed areas of development; the delivery of new or enhanced transport interchanges; safeguard the canal network and identified areas that offer the opportunity to re-connect gaps in the existing network where parts of the canals have been lost; and deal with development in the port and docks. Policy T 5 sets out design principles for transport measures and infrastructure. In-line with PPW, existing transport

proposals will be reviewed so as to remove any proposals that have previously been safeguarded, but are now abandoned, or any that are unlikely to commence during the plan period.

- 4.4.115 The policies have largely been effective, however the evidence base will need to be updated with reference to key changes since the LDP was adopted including Future Wales, relevant updates to PPW, the new Wales Transport Strategy (2021), Active Travel Act Guidance (2021), Manual for Streets 2 (Urban and Rural Streets) (May 2019), Electric Vehicle Charging Strategy for Wales (March 2021).
- 4.4.116 The Replacement LDP will also need to take account of the emerging regional transport planning context and any specific proposals that are confirmed as deliverable within the Replacement Plan period from the Swansea Bay and West Wales Metro.

#### **RP1 – Safeguarding Health / Natural Resources**

4.4.117 Strategic Policy RP1 seeks to ensure that the County's natural environment is protected from materially harmful development. Specifically, this relates to the effect of development on Air, Light and Noise Pollution, Flood Risk, the quality or quantity of water resources, land contamination, land instability or subsidence, sustainable development of mineral resources and sustainable waste management. The policy is supported by a number of detailed policies covering specific topic areas (RP 2 - RP 14). Specific policies are discussed further below.

- 4.4.118 Future Wales indicates that PPW contains the planning policy framework for addressing air quality, soundscape and noise. The planning system should maximise its contribution to achieving the well being goals and in particular a healthier Wales.
- 4.4.119 In respect of noise, Policy RP2 sets out the approach to minimising the effects of noise pollution, including restrictions to developments creating noise in Noise Action Planning Priority Areas or designated Quiet Areas. The AMR indicates that development permitted within Quiet Areas has accorded with the Policy Framework which indicates the Policy is performing effectively. PPW however has a particular emphasis on the need to create appropriate soundscapes and preserve soundscape quality rather than just a focus on noise pollution. It is expected that a new TAN 11 on Noise will be issued which will provide further elaboration on air quality, noise and soundscape in more detail providing greater detail as to how they should be addressed in development plans. Therefore, the terminology and scope of RC 2 will be reconsidered as part of the Replacement LDP. Similarly, consideration will be given to including reference to the Tranguil Areas Map produced by

#### NRW.

- 4.4.120 In respect of air and light pollution Policy RP3 sets out the approach to minimising the effects of air and light pollution from new development. In respect of light pollution, the control of lighting design is important in protecting the dark sky environment of the Gower AONB. The adopted Placemaking Guidance for the Gower AONB SPG sets out detailed considerations in order to control light pollution within this area. It will be necessary therefore that the Replacement LDP adequately covers this issue in an updated Policy RP 3. It will also be necessary to reflect any changes in Air Quality Management Areas.
- 4.4.121 Policy RP 4 seeks to protect the quality of the water environment and to promote good water resource management. The terminology of the policy will need to be updated to reflect that SuDS is now mandatory for all new developments in Wales of more than one dwelling or where the construction area is 100 square metres. Additionally, in light of the NRW planning advice in December 2020 which required development within SAC catchments to achieve phosphate neutrality or betterment, whilst this does not affect watercourses within Swansea, the HRA process for the Replacement LDP will likely need to consider any potential impact on the proposed scale of development of riverine SACs in neighbouring authorities and on the marine SAC which borders

Swansea and Carmarthen. The terminology of RP 4 may therefore need to be updated as this issue is assessed.

- 4.4.122 Policy RP 5 is the supporting policy to RP 1 for the avoidance of floodrisk and sets out measures as to how this will be assessed. The AMR indicates that both policies are performing effectively as no applications were permitted where there was an outstanding objection from NRW on flood risk or contrary advice from NRW. However, as referred previously in para 2.2 the new TAN 15 and Floodmap for Planning is due to come into force in 2023 which will provide a significantly different context for planning decisions compared to the existing framework. Given this the policy will need to be reviewed to reflect the new TAN.
- 4.4.123 Policy RP 6 seeks to ensure that any risks to development arising from contamination or landfill gas generation are identified and accurately assessed and that where appropriate satisfactory measures are taken to overcome the risks identified. No particular issues have been identified with the current policy. PPW sets out that development plans should include policies and proposals for rehabilitation and development of existing derelict sites where development is the preferred response. In addition, any policies for areas of land contamination or instability must be accompanied by the warning they

have been defined on the best available information to the planning authority and are not necessarily exhaustive and that responsibility for determining the extent and effects of such constraints remains that of the developer. The Replacement LDP will consider this guidance should any contaminated sites be promoted.

- 4.4.124 Policy RP 7 aims to steer development away from areas of unstable land. There are no particular issues raised with the policy currently and therefore it is considered it is performing effectively. PPW (para 6.9.25) sets out key policy that planning decisions will need to take account of in respect of land instability. The terminology of RP 7 will be reviewed as part of the Replacement LDP and will be updated as necessary.
- 4.4.125 RP 8 11 Waste Management Policies these provide the local policy framework with regard to the development of new waste management facilities, integration of waste management into new developments, and disposal of agricultural waste.
- 4.4.126 The latest information available from the Waste Planning Monitoring Report (WPMR) for the South West Wales region is the 2021/22 report which indicates a predicted regional landfill void capacity of 7.5 years. This figure is dependent upon several assumptions, including the individual circumstances of

the landfills currently operating (e.g. potential contracts coming to an end), new landfills or alternative residual treatment plants becoming operational, the reduction in actual quantities of residual waste produced, and increases in the amount of waste recycled, re-used or composted.

- 4.4.127 The County's only landfill site, Tir John, closed as a landfill site in 2022 and residual waste is being taken out of the County for disposal in Energy from Waste facilities. How this will impact the regional landfill capacity void will need to be carefully monitored. The WPMR considers that at the present time the management of residual waste in the Mid and South West Wales region is being adequately catered for and no new capacity is required. Nevertheless, LDP policy will need to continue to permit the development of appropriate new waste treatment works in case additional capacity is required; and appropriate new landfill sites in exceptional circumstances including the fact that additional capacity is required.
- 4.4.128 In March 2021, the Welsh Government published "Beyond Recycling – A strategy to make the circular economy in Wales a reality" followed by the "Strategic Assessment for the future need for energy from waste capacity in the three economic regions of Wales". The waste policies will also need to be reviewed to reflect the growing emphasis on minimising waste and the circular economy.

- 4.4.129 Future Wales identifies that SDPs will be required to provide a coordinated framework for waste treatment and disposal, however, the SDP will not be in place ahead of the Replacement LDP being adopted. The LDP waste policy framework should be reviewed to ensure it reflects the latest WPMR and the up to date situation within the County.
- 4.4.130 The AMR indicates that sufficient allocated employment land still exists (B1/2 use class) in the LDP to enable the development of new waste management infrastructure, if necessary.

## **RP 12 – RP 14: Sustainable Development and safeguarding of Mineral Resources**

4.4.131 Policy RP 12 sets out criteria against which all proposals for mineral development will be assessed, including borrow pits, the reworking of mineral tips for their mineral content and the development of land based unconventional oil and gas (i.e. coal-bed methane, shale gas and underground coal gasification). There is a clear Welsh Government policy objective to avoid the continued extraction and consumption of fossil fuels. Therefore, proposals for opencast coal operations, deep-mine development or colliery spoil disposal will not be permitted.

4.4.132 Policy RP 13 identifies mineral safeguarding areas

and prevents development that would sterilise identified natural resources, while RP 14 identifies mineral buffer zones to protect sensitive development from the impacts of mineral operations; and to protect mineral operations from new sensitive development locating too close and potentially impacting on the operator's capacity to carry out permitted mineral operations without causing nuisance.

- 4.4.133 Future Wales identifies the important role played by the South West region's minerals and aggregates in supporting development across Wales and England. SDPs will be required to provide a coordinated framework for minerals extraction, however, the SDP will not be in place ahead of the Replacement LDP being adopted.
- 4.4.134 Therefore, forward planning for minerals forms an intrinsic part of the LDP process. In accordance with the recommendations contained within the evidence base of the current LDP, Regional Technical Statement (RTS) 1st Review, no future provision for land-won primary aggregates, including allocations for future workings have been identified within the current LDP. The principal objectives of the RTS are to inform the provision of adequate reserves of aggregates in the LDPs in order to ensure sufficient provision for construction and other industries in the most sustainable manner reasonably achievable.

- 4.4.135 Since adoption of the LDP, the RTS for the North and South Wales Regional Aggregate Working Party, 2nd Review, was adopted in 2020. This second review provides updated projections and amends the methodology in relation to the forecast consumption of aggregate as well as the historic pattern of supply.
- 4.4.136 This latest RTS requires Swansea, through its LDP, to meet the apportionment of 0.305 million tonnes (mt) of crushed rock (specifically HSA Sandstone) per year until the end of the Plan period and for 10 years thereafter (7.636 million tonnes over 25 years). This requirement is not reflected by the current LDP, and NPT currently cover Swansea's apportionment requirement. The LDP policies will therefore need to be reviewed in light of the latest RTS and potentially consideration will need to be given to allocating preferred areas on the Replacement LDP Proposals Map.

#### **Review of LDP Proposals Map**

- 4.4.137 The content of the LDP Proposals Map will require changes as part of the Replacement LDP in order to reflect any spatially relevant changes made to the plan such as amended allocations, boundaries and spatial changes to other policies.
- 4.4.138 In addition, the LDP Constraints Map contains designations that are not directly proposals of the LDP

but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas, Conservation Areas, SSSI's, etc. This will also need to be reviewed to ensure it is comprehensive and up to date.

#### **Review of LDP Monitoring Indicators**

- 4.4.139 The LDP monitoring framework will need to be reviewed in order to reflect changes made to the Replacement LDP strategy, policies and proposals.
- 4.4.140 The review will also reconsider whether all the indicators are necessary with reference to the Development Plans Manual, which states the monitoring framework should be focussed on those key policies fundamental to delivering the Plan and that it should not be too onerous or too complex. There are also some existing areas of duplication which should be removed.
- 4.4.141 Existing indicators will be reviewed to identify any minor amendments that can make the monitoring more efficient (some suggested changes have been highlighted in AMR reports), or that are necessary to reflect national guidance (eg the new housing delivery monitoring arrangements which have been actioned in the AMRs), or to ensure all the indicators remain specific, measurable and realistic (for example amending any indicators where the dataset has been

discontinued).

#### **Review of SEA/SA**

- 4.4.142 A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the Plan in an iterative manner. The process will also integrate other relevant assessments, such as the Welsh Language Impact Assessment, the Equalities Assessment and Health Impact Assessment. The process will be entitled the Integrated Sustainability Appraisal (ISA).
- 4.4.143 The ISA process will be integral to the development of the Replacement LDP and will follow the main stages as set out in the Development Plans Manual. This will ensure the vision, objectives, policies and proposals promote sustainable development and take account of any significant effects on the environment. The ISA will be an iterative process throughout preparation of the Replacement LDP and its subsequent annual monitoring enabling the Council to assess the extent to which the Plan is contributing to the achievement of sustainable development and to identify any concerns.
- 4.4.144 To inform preparation of the Replacement LDP it will be necessary to revisit and update environmental,

social and economic baseline information, along with the review of relevant plans policies and programmes, contained within the Scoping Report previously prepared for the LDP. The Scoping Report will identify key issues that should be addressed via the Replacement LDP and should inform the LDP objectives.

4.4.145 The SA Monitoring Framework including the SA Objectives will also need to be reviewed to ensure it remains up to date, including considering whether the methodologies need revising due to changes in legislation.

#### **Review of HRA**

- 4.4.146 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which was to assess the impacts of the LDP, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain following screening what needs Appropriate Assessment (AA).
- 4.4.147 Further to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, SACs and SPAs in the UK no longer form part of the European

Union's Natura 2000 ecological network. A National Site Network has been created in the UK, which includes SACs and SPAs. Ramsar sites (designated under the Ramsar Convention on Wetlands of International Importance) do not form part of the National Site Network and are not subject to the Habitats Regulations, however they are treated within the planning system in the same way as SACs and SPAs.

4.4.148 The new Regulations came into force on the 1st January 2021. The Replacement LDP will again need to be subject to HRA, and this will require the HRA screening process and methodology to be reviewed and revisited and applied to emerging LDP proposals in an iterative process to ensure that the relevant legislation and regulations are complied with and any issues are fully addressed.

#### Chapter 4 Conclusions on Review of adopted LDP

While this review has identified that much of the LDP is operating well, the evidence base of the Plan will need to be updated due to the timescales since the Plan was adopted. This will include a review of the scale of growth required over the Replacement LDP period. This could require a change to the scale of growth requirement. Furthermore, while the existing spatial strategy is considered to be sound, the way in which it is delivered will need to be reviewed against changes since the Plan's adoption including for example the relevant spatial aspects set out in Future Wales; the need to replace delivered allocations and to account for delays in some allocations coming forward more slowly than envisaged through the addition of any new allocations required to deliver the updated housing requirement; and a detailed review of undelivered existing allocations. In-line with PPW (ed11) there must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, which will require an update to the evidence of housing needs. Furthermore, there will need to be a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering of the proposed housing requirement.

- Consequently there are likely to be some changes to the growth strategy and to aspects of how the spatial strategy is delivered. This would not be suited to the SFR procedure and a Full Review will be required to enable the LPA to respond to these strategic issues and to fully update the evidence base on which the Plan is based.

- This Chapter has highlighted that specific elements of the Plan will need to be updated such as with regard to the need for, and provision of, pitches for Gypsies and Travellers, affordable housing need, high level financial viability levels of delivering affordable housing and physical infrastructure requirements, the retail need evidence base, transport infrastructure impacts of new allocations, amendments to reflect new national guidance expected on flood risk, and review of the provision of areas for mineral extraction.
- Changes in context such as emerging deliverable proposals from the SW Wales Metro will need to be understood in order to be reflected in the Replacement LDP.
- The review has also identified various opportunities to update policies which are otherwise working effectively in order to refine the Plan.
  - This report does not detail every opportunity and the LPA will continue to review and refine through the Replacement LDP process building on experience of using the policies since plan adoption.

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# Chapter 5. Opportunities for Collaborative Working

#### 5.1 Introduction

- 5.1.1 WG Guidance<sup>11</sup> states that, when undertaking LDP reviews, all opportunities for joint working and collaboration on both plan preparation and the evidence base should be considered. This is in the interests of maximising the opportunities and efficiencies of evidence gathering, consultation and co-operation in tandem, and/or through joint working arrangements. Such an arrangement can be particularly relevant for LDPs on similar preparation timescales, and where authorities have strong geographical and/or functional linkages. Collaboration is a requirement of the Well-being of Future Generations Act and an integral part of the LDP soundness tests (i.e. the test of compatibility of the LDP with the plans of neighbouring authorities).
- 5.1.2 This Chapter considers the opportunities that exist for joint working with other LPAs, both in terms of preparing joint Plans and in terms of gathering evidence.

#### 5.2 SDP and Joint LDP's

- 5.2.1 Swansea shares its administrative boundary with three other Authorities: Neath Port Talbot County Borough Council, Carmarthenshire County Council, and Brecon Beacons National Park Authority. In terms of timescales, there is little opportunity to prepare a Joint LDP with any of these adjoining authorities, as they are at more advanced stages in their Replacement LDP preparation process.
- 5.2.2 Despite the incompatible timescales, collaboration with all neighbouring authorities will nevertheless be a central part of the work to prepare the Replacement LDP, which will need to fit as far as possible with the existing and/or emerging strategies and proposals of these adjoining areas.
- 5.2.3 As highlighted in Chapter 2 above, Future Wales requires the preparation of a SDP in South West Wales but it will not be in place ahead of the likely adoption date of the Swansea Replacement LDP. Notwithstanding this, over the course of preparing the Replacement LDP, there will be a need for the LPA to closely monitor the implications of any emerging SDP work as and when new regional policy direction emerges.

<sup>&</sup>lt;sup>11</sup> Development Plans Manual

#### 5.3 Joint Working on Evidence Base

- 5.3.1 The most effective focus and use of resources at this stage will be to build on existing joint working arrangements and take all opportunities where it is relevant to consider issues in a cross-boundary manner on the key areas of evidence underpinning LDPs. This will ensure a compatible and consistent evidence base across LDPs and can inform future work towards the SDP.
- 5.3.2 To date, discussions and progress have centred on working with NPT Council on projects to assess employment and housing growth projections, and to produce an updated Local Housing Market Assessment. These will form key evidence for the levels of growth in each LDP and by undertaking jointly can properly take account of cross authority border issues with regard to the housing and employment markets and the Swansea Bay context. The Authorities comprising the South West Region are also working together on provide a better understanding of the extent of the National Growth Area identified in Future Wales.
- 5.3.3 In addition, the authorities in both the West Wales and Mid Wales regions have worked together on a 'Regional Viability Study' (RVS). The RVS, led by Andrew Burrows of 'Burrows-Hutchinson' has led to the completion and implementation of a Development

Viability Model (DVM) for use by all the Authorities. The DVM is a spreadsheet based appraisal tool capable of assessing the overall levels of viability in sub areas of an Authority, as well as for testing the suitability and deliverability of specific sites for inclusion in a Development Plan.

- 5.3.4 There are opportunities for other collaborative work to be undertaken to inform Replacement LDP preparation. This could include, for example, joint work on minerals evidence; retail planning; landscape assessments; renewable energy assessments, and the consideration of the Fabian Way Innovation Corridor area that extends across both Swansea and NPT Authority boundaries.
- 5.3.5 Ongoing dialogue with other LPAs will help maximise efficiencies and consistency with regard to gathering/sharing evidence and agreeing methodologies where possible.

#### **Chapter 5 Conclusions on Opportunities for Collaborative Working**

- The LPA has explored the options for working jointly with other LPAs on the Development Plan but has concluded that the most appropriate option at this time is for the Council to prepare a Replacement LDP on an individual LPA basis.

- However, wherever possible, the LPA will continue to work collaboratively with other neighbouring LPAs on producing a consistent and coherent evidence base (notable elements of joint work have commenced on key evidence studies needed to inform the growth requirements) and work with other LPAs in the future to prepare a SDP for the South West region.

### **Chapter 6. Conclusions and Next Steps**

#### 6.1 Conclusions

- 6.1.1 Having regard to the findings set out in the latest AMR in respect of certain monitoring indicators, and the impending need for the statutory LDP review process to be underway on the Swansea LDP by February 2023 in any event, the recommendation of AMR 3 was that a LDP Review Report should be prepared in-line with the process prescribed by Welsh Government guidance and legislation.
- 6.1.2 The review undertaken for this Report has shown that, whilst much of the Swansea LDP is operating well, there is a clear need to update the evidence base of the Plan. This is due to the timescale that has elapsed since LDP adoption, but more importantly the significant material changes in the strategic planning and societal contexts that have arisen during this period. This includes a need to review the scale of population growth going forward in the light of emerging data, which could in turn require a change to the scale of the housing and employment growth strategy for Swansea. Furthermore, while the existing spatial strategy is considered to be sound, the way in which it is delivered will need to be reviewed against significant material changes since the Plan's adoption. This includes the relevant policies and parameters set

out in Future Wales - the National Development Plan published post LDP adoption.

- 6.1.3 The review has also highlighted there is a need to consider in detail whether the findings of the latest AMR, in respect of delays incurred on delivering certain LDP allocated sites, necessitate the identification of any new allocations to deliver any updated housing requirement. This would require a comprehensive review of undelivered existing allocations and the individual merits and deliverability of other allocations. Such a process reflects the requirements of PPW (ed11), which states there must be sufficient sites suitable for the full range of housing types to address the identified needs of communities. This necessitates an update to the evidence of housing needs. An important part of ensuring a sufficient range of sustainable and deliverable sites are available, is providing an opportunity for all sectors and types of house-builder to contribute to delivering the housing requirement, including nationals, regionals, Small and Medium-sized Enterprises (SMEs), registered social landlords (RSLs), and the custom and self-build sector.
- 6.1.4 It is clear that the use of the SFR procedure focused on only limited parameters and issues would not be appropriate or justified. This is particularly evident given the need to review the levels of growth going forward and the spatial strategy that should be linked to that growth. Furthermore, the SFR procedure excludes

the requirement to undertake pre-deposit public consultation, which would be an important part of reviewing matters relating to the scale and distribution of growth.

- 6.1.5 In light of the above, this Review Report concludes that it is necessary for a Full Review procedure be undertaken for the Swansea LDP, to enable the LPA to respond to the strategic issues and key policy matters raised in this Report, and to fully update the evidence base on which the LDP is based.
- 6.1.6 This would mean that a Replacement LDP would be prepared for the period 2023 to (likely) 2038 following the same full procedures as used in preparing the adopted LDP. Preparation of a Replacement LDP will ensure that effective local decision making in planning can continue after the adopted LDP's "end-date" of 1<sup>st</sup> January 2026, in-line the plan-led approach in Wales required by Welsh Government.
- 6.1.7 This Report has highlighted various elements of the LDP evidence base that need to be updated. It has highlighted that any changes to this evidence may need to be reflected in amendments to current LDP policies, including with regard to: the need for, and provision of, pitches for Gypsies and Travellers; affordable housing need; high level financial viability of delivering affordable housing and physical infrastructure requirements in the different parts of the

County; retail need and provision; transport infrastructure impacts of allocations; the potential need for provision of areas for mineral extraction and the sustainable development of mineral resources; and to reflect new national guidance expected on flood risk. This list is not intended to be exhaustive.

- 6.1.8 There are important and significant changes in national, regional and local policy and circumstances that need to be fully reviewed and reflected where necessary in Plan revision. As well as the implications of Future Wales, this includes the new regional planning agendas, the emerging proposals of the SW Wales Metro, and the latest Local Wellbeing Plan context.
- 6.1.9 This Report has also identified how opportunities should be taken to update policies that, although largely working effectively based on the AMR, could benefit from wording changes in order to refine the Plan. The report has highlighted such instances but does not detail every opportunity. The LPA will need to continue to review and refine through the Replacement LDP process, building on evidence gained from the experience of using the policies in planning decision making since Plan adoption.
- 6.1.10 It should be noted that this Review Report is not intended to detail all of the changes that will be made to the LDP, as these will only be determined through the formal preparation process of the Replacement LDP.

- 6.1.11 WG Guidance<sup>12</sup> states that, for LDP reviews, LPAs should consider and demonstrate they have exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base.
  Collaboration is a requirement of the Well-being of Future Generations Act and an integral part of the LDP soundness tests.
- 6.1.12 The LPA has therefore explored the relevant options for working jointly with other LPAs on the Development Plan. It has concluded however that the most appropriate option at this time is for the Council to undertake a full review of the existing LDP on an individual LPA basis. Wherever possible, the LPA will continue to work collaboratively with other neighbouring LPAs on producing a consistent and coherent evidence base (notable elements of joint work have commenced on key evidence studies needed to inform the growth requirements) and work with other LPAs in the future to prepare a SDP.

#### 6.2 Consultation on the Review Report

6.2.1 Stakeholders have made a valuable contribution in helping to identify and clarify what issues need to be considered, how effective the existing LDP has been in terms of delivery, and the extent of changes likely to be

required to the Plan. Stakeholder and public consultation and engagement has been undertaken on the draft Review Report, including with specific and general consultation bodies as suggested in the Welsh Government's Development Plans Manual.

6.2.2 The LPA has reviewed the consultation responses received and considered the potential implications for both the content of the Plan and the review process. Appropriate amendments have been made in the final Review Report which will be reported to Council Members prior to submission to Welsh Government, thereby confirming the form and type of Plan review that will be undertaken. The Review Report will be a key part of the evidence base underpinning the form and content of the revised plan, and ultimately will be one of a number of documents submitted to the appointed Planning Inspector as part of the Examination process.

<sup>&</sup>lt;sup>12</sup> Development Plans Manual

## **Appendix 1: Policy Review**

Theme	Code	Policy	Notes
Placemaking and Sustainable Development	PS 1	Sustainable Places	Policy is functioning effectively - AMR has concluded that green wedges and countryside is being protected from inappropriate development and development is being directed towards the most sustainable places within the defined settlement boundaries. Review of Urban boundary as part of the LDP Review will need to consider extant consents both for new development and approved extensions to existing residential curtilage.
	PS 2	Placemaking and Place Management	Policy functioning effectively but minor amendments required - Policy to be updated to reflect national sustainable placemaking outcomes and Future Wales Strategic Placemaking principles. Consideration will be given to widening the scope of the policy to provide guidance on overheating, the need for safe and legible entrances to be reflected within criterion vii and new criterion requiring sufficient amenity and private space for all forms of residential developments
	PS 3	Sustainable Housing Strategy	Revision required - The review process provides an opportunity to revisit the most appropriate levels of future housing growth for the Replacement LDP Plan and to determine whether the current strategy remains the most appropriate way of meeting identified housing requirements. Consideration of meeting demand for Care Homes will be required.

	PS 4	Sustainable Employment Strategy	<u>Revision required</u> - The review process provides an opportunity to revisit the most appropriate future levels of employment growth for the Replacement LDP Plan and to determine whether the current strategy remains the most appropriate way of meeting the identified employment requirements.
Strategic Development and Masterplanning	SD 1	Strategic Development Areas	<u>Revision required</u> - The review process provides an opportunity to revisit the most appropriate future levels of growth for the Replacement LDP Plan and to ensure the current strategy remains the most appropriate way of meeting requirements.
	SD 2	Masterplanning Principles	Policy functioning effectively but minor amendments required - The review will need to reconsider the policy threshold for triggering masterplanning requirements which may include consideration of both numbers and size of site.
	SD A	South of Glanffrwd Road, Pontarddulais	Site is at pre planning stage and will be reassessed in-line with national guidance with respect to updated deliverability and viability evidence
	SD B	North of Garden Village	Whole site has planning consent and will become a commitment
	SD C	South of A4240, Penllergaer	Whole site has planning consent and will become a commitment
	SD D	West of Llangyfelach Road, Penderry	Whole site has planning consent and will become a commitment
	SD E	North of Clasemont Road, Morriston	Site is at pre planning stage and will be reassessed in-line with national guidance with respect to updated deliverability and viability evidence

SD F	Cefn Coed Hospital, Cockett	Site is at pre planning stage and will be reassessed in-line with national guidance with respect to updated deliverability and viability evidence. Potential to become a health-led strategic site
SD G	Northwest of M4 J46, Llangyfelach	Planning application has been submitted for determination and progress will need to be monitored. Potential to review as part of wider mixed use scheme with Business Park.
SD H	North of Waunarlwydd/Fforestfach	Planning application has been submitted for determination and progress will need to be monitored on that part of the site. Remainder of the site is at pre planning stage.
SD I	Swansea Vale	Site is at pre planning stage and will be reassessed in-line with national guidance with respect to updated deliverability and viability evidence.
SD J	Swansea Central Area	Regeneration of the Central Area remains a Corporate priority. SD J comprises multiple sites and regeneration opportunities and will need to be reviewed to ensure it remains up to date and reflects the latest deliverability and viability evidence and regeneration priorities for the Central Area.
SD K	Fabian Way Corridor	SD K comprises multiple sites and regeneration opportunities and will need to be reviewed to ensure it remains up to date and reflects the latest deliverability and viability evidence.
SD L	Tawe Riverside and Hafod Morfa Copperworks	SD L comprises multiple sites and regeneration opportunities and will need to be reviewed to ensure it remains up to date and reflects the latest deliverability and viability evidence.

Infrastructure Requirements and Obligations	IO 1	Supporting Infrastructure and Planning Obligations	Policy is functioning effectively but updates are required- Necessary infrastructure is being secured to mitigate the impact of and support delivery of new development. However there are areas of clarification required on particular topics with the current SPG being out of date. The review offers the opportunity to reflect on the elements that need to be updated through replacement LDP policies and also to prepare an updated S106 SPG in tandem. An updated Infrastructure Delivery Plan to support the LDP will be developed as part of the review.
	10 2	Employment and Training Opportunities	Policy is functioning effectively but updates are required -The policy wording will be reviewed to reflect the latest updates to the Council Community Benefit Policy. Further guidance is necessary in securing this as part of development which will be contained within the replacement S106 SPG which will be prepared as part of the SPG.
Housing	H 1	Non-Strategic Housing Sites	A number of sites have been delivered, and further sites will become commitments with planning consent. Sites that have not been progressed will be reassessed in-line with national guidance.
	H 2	Affordable Housing Strategy	<u>Revision Required</u> - Provision for required affordable housing provision will be reviewed as part of the Replacement plan process informed by an updated Local Housing Market Assessment.

Н 3	On-site Affordable Housing	Revision Required - Policy considered to be working effectively to secure affordable housing in line with the target percentages. However, target percentages and thresholds for triggering the policy will be reviewed by updated Viability work needed to inform the Replacement LDP and in light of changes to ward boundaries. Further guidance to support the interpretation of the policy should be included as part of updated Planning Obligation SPG.
H 4	Off-site Affordable Housing	Policy is functioning effectively but minor updates are required - The policy is working in only facilitating affordable housing off site in exceptional circumstances. However it is considered further guidance to support the interpretation of the policy should be included as part of updated Planning Obligation SPG.
Н 5	Local Needs Housing Exception Sites	<u>Policy functioning effectively but minor updates required</u> - A number of sites have been delivered, and further sites will become commitments with planning consent. Sites that have not been progressed will be reassessed in-line with national planning guidance. Further allocations will be considered in light of the emerging Local Housing Market Assessment. Further clarification on the interpretation of the policy will be provided in the updated Planning Obligations SPG.

Н 6	100% Affordable Housing Exception Sites	Policy is functioning effectively but minor updates are required -Clarification required within the amended policy that where affordable housing is provided on a 100% Affordable Housing Exception site (as defined in LDP Policy H 6), the Council will not typically allow the affordable homes to be intermediate tenures that would permit occupiers to staircase to full ownership of the home. The only exception to this will be instances where the applicant has demonstrated to the satisfaction of the Council that secure arrangements will be in place to guarantee the relevant home(s) will, upon re-sales, always be sold or let as affordable housing. National planning policy is clear that affordable housing exception sites are not appropriate for market housing.
Н 7	Gypsy and Traveller Accommodation	<u>Revision required</u> - A review will need to be undertaken to inform the Replacement LDP regarding the latest need position for additional pitches in Swansea which will be identified in the most up to date GTAA and the provision in place to accommodate that need.
Н 8	Ancillary Residential Accommodation	Policy performing effectively but updates may be required - These policies are not routinely monitored through the AMR but will be reviewed in the preparation of the Replacement LDP with Development Management colleagues to ensure they are operating successfully and remain appropriate and up to date.

Н 9	Houses in Multiple Occupation	<ul> <li>Policy functioning effectively but minor amendments required</li> <li>The LDP AMR has monitored the concentration of HMOs within the HMO Management Area which is defined on the Proposals Map. Each AMR has concluded that the concentration of HMOs in this designated area has not varied significantly from the baseline (as reported in AMR 3). The policy is generally considered to be operating as intended. However, it will be necessary to review this, along with the supporting SPG, for example with regard to assessing any changes in HMO concentrations in areas outside of the Management Area, and for any useful minor alterations or clarification to the policy text that would be appropriate and potential expansion of the policy to cover new forms of housing such as co-living.</li> <li>Policy functioning effectively but minor updates may be</li> </ul>
H 10	Specialist Housing	required - These policies are not routinely monitored through the AMR but will be reviewed in the preparation of the Replacement LDP with Development Management colleagues to ensure they are operating successfully and remain appropriate and up to date
H 11	Purpose Built Student Accommodation	Policy functioning effectively but updates required - The policy is generally considered to be operating as intended with the majority of new PBSA being guided to Central Area sites. Nonetheless, the policy will be reviewed to ensure the policy remains appropriate and up to date.

Historic and Cultural Environment	HC 1	Historic and Cultural Environment	Policy functioning effectively but minor updates required - No specific issues were identified in the AMR in respect of the operation of the LDP policies for the Built Environment and Historic Heritage. Issues that may need to be considered as part of the review include changing the terminology used to bring it in line with the latest policy (PPW and TAN24) and guidance (e.g. Historic Environment rather than Historic Heritage and Historic Assets of Special Local Interest rather that Buildings of Local Importance).
	HC 2	Preservation or Enhancement of Buildings and Features	Policy functioning effectively but minor updates required - Clarification required that development should protect conserve and enhance the special interest of parks and gardens or its setting in line with national policy.
	HC 3	Development in the Welsh Language Sensitive Area	Policy functioning effectively but minor updates required - Whilst policy is working effectively in terms of developers considering the impact of proposals on the Welsh language the policy could usefully clarify the difference between a Welsh Language Impact Assessment and Welsh Language Action Plan. As part of the review latest census data will be analysed to determine whether there will be a need to amend the extent of the designated Welsh Language Sensitive Area (WLSA), and a review of the boundary to take account of changes to Ward boundaries; and consideration of whether the policy thresholds require revision

Social Infrastructure	SI 1	Health and Well-being	Policy functioning effectively - The review will need to consider whether it should remain as a stand alone overarching policy or whether it should be amalgamated under a new overarching theme of sustainable placemaking and interwoven throughout policies, incorporating the concept of 'Health in All Policies' (HiAP). The LDP goes some way to achieve this, with policies relating to air, noise and light pollution, land contamination, transport, etc all relating to public health impacts. Consideration will be given whether the potential implications on physical and mental health implications due to development should be given greater emphasis in policies within the Replacement LDP.
	SI 2	Providing and Safeguarding Community Facilities and Locally Important Uses	Policy functioning effectively but updates required - Policy is working effectively in protecting the loss of community facilities of local value. Additional criteria could be included dealing with proposals that do not lead to the loss of a facility but may affect its operation. The wording will be reviewed as part of the RLDP to identify any opportunities for improved clarification on specific matters.
	SI 3	Education Facilities	Policy functioning effectively but updates may be required - The policy is working effectively to secure education infrastructure to mitigate the impact of and to support new development. However a review of the methodology for calculating education contributions from new development is required to update the outdated SPG. Therefore Policy SI 3 will be reviewed alongside the review of the planning obligations SPG in respect of securing education provision and will be updated accordingly as part of the process.

S	51 4	Morriston Hospital	<u>Review of Policy required</u> - Engagement with the Local Health Board will be necessary to inform the Replacement LDP as to future plans for the expansion of Morriston Hospital in order that the policy can adequately facilitate development as appropriate.
S	SI 5	Protection of Open Space	Policy functioning effectively but minor updates required- The policy is performing effectively in terms of ensuring development on open space is acceptable or appropriately mitigated. The wording of the supporting justification will need to be reviewed in so far as it reflects current FIT guidance.
S	51 6	Provision of New Open Space	<u>Policy functioning effectively but updates required</u> - The policy is performing effectively in terms of securing appropriate open space provision in new development. However the open space guidance is being reviewed as part of the amendments to the Planning Obligations SPG so the policy will be updated as part of this process. It will need updating to refer to current FIT standards on quantity guidelines and walking guidelines and which also supersedes reference to Accessible Natural Green Space Toolkit as the FIT guidance includes provision for informal outdoor space and within that is natural/semi- natural greenspace which has the same target set out in the ANGS toolkit. Policy criteria to consider how new open space delivers wider GI multifunctional benefits.
S	SI 7	Cemeteries	<u>Review required</u> - Future need for cemetery provision will be assessed as part of the LDP review process in consultation with bereavement services.

	SI 8	Community Safety	Policy functioning effectively but updates required - The existing supporting SPG 'Planning for Community Safety' will need updating as part of the LDP Review.
Regeneration and Commercial Development	RC 1	Swansea Central Area Regeneration	Policy functioning effectively - The Swansea Central Area regeneration remains a corporate priority but the policy will be reviewed to ensure it reflects up to date priorities as they emerge through the review process. The boundary of the central area will also need reviewing to ensure all relevant regeneration opportunities such as the area to the north of the train station and the Palace Theatre are incorporated.
	RC 2	Retail and Leisure Development	Policy functioning effectively with minor updates required - The policy reflects the town centre first principle advocated by PPW and Future Wales and is performing effectively in terms of promoting the vitality and viability of defined centres. However as part of the LDP Review the retail centre boundaries will need to be reviewed to ensure they remain up to date. Further clarifications to policy text will be considered.
	RC 3	Swansea Central Area Retail Centre	<u>Policy functioning effectively but review required</u> - The policy will need to be updated to reflect the ongoing regeneration priorities for the Central Area Retail including amendments to the policy amplification in terms of developments on the Swansea Central Scheme.
	RC 4	Swansea Central Area - Complementary Areas	Policy functioning effectively but review required - The policy will need to be updated to reflect the ongoing regeneration priorities for the Central Area Retail including amendments to the policy amplification in terms of developments on the Swansea Central Scheme.

RC 5	District Centres	Policy functioning effectively but updates may be required - Policy criteria will need to be reviewed considering approaches to revitalising town centres in Welsh Government guidance such as Building Better Places: Placemaking and the COVID19 recovery. The existing District Centre Retail boundaries will be reviewed to ensure they remain up to date
RC 6	Local Centres	Policy functioning effectively but updates may be required - Policy criteria will need to be reviewed considering approaches to revitalising town centres in Welsh Government guidance such as Building Better Places: Placemaking and the COVID19 recovery. The existing Local Centre Retail boundaries will be reviewed to ensure they remain up to date
RC 7	Out of Centre Retail Parks	Policy functioning effectively - However the existing retail park boundaries will be reviewed to ensure they remain up to date.
RC 8	Commercial Development within Strategic Development Areas	Policy functioning effectively - Policy is facilitating appropriate commercial development with SDA's. Will be reviewed based upon the options for accommodating the level of development going forward.
RC 9	Ground Floor Non-Retail Uses within Centres	Policy functioning effectively but updates may be required - Policy criteria will need to be reviewed considering approaches to revitalising town centres in Welsh Government guidance such as Building Better Places: Placemaking and the COVID19 recovery.
RC 10	Employment and Enterprise Development	Policy functioning effectively but amendments required - However further guidance on rural business/enterprise could improve the policy.

	RC 11	Alternative Uses at Employment Locations	Policy considered to be operating successfully but updates required - Policy is successful in controlling non B1/B2/B8 uses on employment areas. However it is considered beneficial that the policy is reviewed to provide further guidance on what constitutes established industrial and commercial land/premises in relation to RC 11, since existing employment sites are not identified spatially on the proposals map
	RC 12	Office Development	Policy considered to be operating successfully - Policy is successful in directing large scale offices to the city centre. Policy wording will be reviewed and any improvements/clarification to policy wording will be implemented.
	RC 13	Swansea Enterprise Park	Policy functioning effectively - Consideration necessary as to whether to define the spatial area of the Enterprise Park on the Proposals Map to provide clearer guidance as to the extent of area the policy applies to.
Ecosystem and Resilience	ER 1	Climate Change	Policy functioning effectively but updates required - Sets the policy framework to ensure that all development is resilient to and mitigates against the impacts of climate change which reflects Council key corporate priority. Policy may require greater emphasis on ecosystems.

ER 2	Strategic Green Infrastructure Network	Policy functioning effectively but review required - Policy successful in delivering new GI as part of development. However it will be important to ensure the GI policy reflects the cross cutting nature and need for multifunctionality for example in respect of biodiversity and geodiversity, open space, flood risk alleviation, drainage, active travel, landscape, health and wellbeing, and placemaking. Consideration should be given to an overarching Strategic GI policy.
ER 3	Green Wedges	Policy functioning effectively but review required - Policy is ensuring the openness and character of Green Wedges are being retained. Green Wedges will need to be reviewed as part of the RLDP to ensure they remain appropriate and only designated where there is demonstrable need to protect the urban form and where alternative policy mechanisms such as settlement boundaries would not be sufficiently robust.
ER 4	Gower Area of Outstanding Natural Beauty (AONB)	Policy functioning effectively but updates required – Policy updated to include potential need for LIA's/LVIA's, lighting strategies, Colour Impact Assessments, and the potential of designated landscapes to deliver more for biodiversity. Importance of Dark Skies Community designation to be highlighted. Furthermore the policy should be linked to the revised Placemaking Guidance for the Gower AONB SPG and ensure wording is accurate and consistent throughout LDP policies in relation to safeguarding AONB.
ER 5	Landscape Protection	Policy functioning effectively but will need to be reviewed - The extent of SLA designations will be re-assessed for the Replacement LDP to ensure they remain appropriate and the area covered requires additional protection. Further clarification on LIA could be made more specific in the policy justification.

ER 6	Designated Sites of Ecological Importance	Policy functioning effectively but will be reviewed - Policies ER 6, 8 and 9 need to be reviewed in order to reflect changes in terminology introduced in 2019 by the Conservation of Habitats and Species Regulations 2017 (as amended) (known as the 2019 Regulations) as a result of the UK's withdrawal from the European Union and the Natura 2000 site network
ER 7	Undeveloped Coast	Policy ER 7 functioning effectively but updates required - needs to be revised to include reference to the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment, 2017 and the Placemaking Guidance for the Gower AONB SPG. Reference to seascape impact assessments accompanying planning applications when considered necessary needs to be included within policy ER 7.
ER 8	Habitats and Species	Policy functioning effectively but minor updates required - Policies ER 6, 8 and 9 need to be reviewed in order to reflect changes in terminology introduced in 2019 by the Conservation of Habitats and Species Regulations 2017 (as amended) (known as the 2019 Regulations) as a result of the UK's withdrawal from the European Union and the Natura 2000 site network.

			Policy functioning effectively but minor updates required -
			Policies ER 6, 8 and 9 need to be reviewed in order to reflect
			changes in terminology introduced in 2019 by the
			Conservation of Habitats and Species Regulations 2017 (as
			amended) (known as the 2019 Regulations) as a result of the
		Ecological Networks and Features of	
	ER 9	Importance for Biodiversity	2000 site network.
			Policy functioning effectively but updates required - Policy ER
			10 should be reviewed in order to ensure all the designated
			RIGS are identified and the link to the inclusion of
		Geological and Geomorphological	geodiversity within GI Assessments, where appropriate, is
	ER 10	Sites of Value	strengthened.
			Policy functioning effectively but updates required – Policy will
		Trees like day and a difference of the	need to be reviewed in order that it fully reflects the new
	ER 11	Trees, Hedgerows and Development	Trees, Hedgerows and Woodlands SPG
			Policy functioning effectively but review required – All key
			villages will be reviewed as part of the LDP including
Countryside and		Key Milleree	boundaries as part of settlement review. Accordingly policy
Village Development	CV 1	Key Villages	criteria will be reviewed as part of this process.
			Policy functioning effectively but updates required - Does not
			refer to new 'business', only new rural enterprise. Need to
			amend settlement boundaries to take account of new
			planning permissions - extending gardens/curtilages/buildings
	CV 2	Development in the Countryside	beyond existing settlement boundaries.
		Replacement Dwellings in the	Policy functioning effectively but updates required - Size,
	CV 3	Countryside	footprint, materials, climate/carbon accounting?
			Policy functioning effectively but updates required – Policy will
	CV 4	Conversion of Rural Buildings	need to provide further clarification on the scope of a
			need to provide further dannoation on the scope of a

			traditional rural building. Further clarification on the difference between this and TR5 within the policy.
			Policy functioning effectively but updates required – Links to Tourism and CV2 policies need to be made clear. Some
	CV 5	Farm Diversification	updates required to improve clarification of policy wording.
Tourism and Recreation	TR 1	Tourism, Recreation and Leisure Development	Policy functioning effectively but updates required – Policy needs to be updated to reflect the greater range and type of buildings and holiday accommodation being developed as tourism accommodation. Further clarification on the scope of contents of a TNDIA that a developer is required to submit is required.
	TR 2	Developed Coast and Waterfront	Policy functioning effectively and no changes considered necessary at present.
	TR 3	Sustainable Tourism and Recreation Development in the Countryside	Policy functioning effectively but updates required – Policy needs further clarification that the scope of the policy is to consider activity based enterprises rather than accommodation proposals which are covered by other policies of the plan.
	TR 4	Clyne Valley Country Park and Penllergaer Valley Woods	Policy functioning effectively and no changes considered necessary at present. Policy amplification to be updated in light of emerging Clyne Valley Country Park Management Plan.
	TR 5	Holiday Accommodation	Policy functioning effectively but updates required – Potential consideration of policy to consider proposals providing holiday accommodation within settlement limits to ensure they are effectively controlled and of sufficient quality. Any links to Policies CV 2 and CV 5 to be clarified.

	TR 6	New Static Caravan, Touring Caravan and/or Camping Sites Within the AONB	Policy functioning effectively but some updates required - Re- examine policy in light of 'newer' forms of accommodation that meet the legal definition of a caravan and/or are considered to be operational development and address the issue of levels of permanence in the landscape.
	TR 7	New Static Caravan, Touring Caravan and/or Camping Sites Outside the AONB	Policy functioning effectively and no changes considered necessary at present.
	TR 8	Existing Static Caravan, Touring Caravan and/or Camping Sites	Policy functioning effectively and no changes considered necessary at present.
	TR 9	Extensions to, and Overflow Areas of, Touring Caravan and/or Camping Sites	Policy functioning effectively and no changes considered necessary at present.
	TR 10	Short-term 'Festival' Camping Events	Policy functioning effectively and no changes considered necessary at present
	TR 11	Caravan Rallies	Policy functioning effectively and no changes considered necessary at present
	TR 12	Storage of Caravans	Policy functioning effectively and no changes considered necessary at present
	TR 13	Residential Use of Holiday Accommodation	Policy functioning effectively but updates required – Widening scope of policy to include consideration of garden rooms/annexes given that such accommodation would not be suitable for permanent residential occupation.
Transport, Movement and Connectivity	T 1	Transport Measures and Infrastructure	Policy functioning effectively but updates required – A new strategic transport study will need to be undertaken to inform the RLDP. Policy will be reviewed as part of the LDP to reflect the outcome of this study. Policy will need to reflect current Placemaking objectives such as provision of GI, need for provision of ELUV's in development and S W Wales Metro proposals.

Т 2	Active Travel	Policy functioning effectively and no changes considered necessary at present
Т 3	Strategic Bus Based Rapid Transit	Policy will need to be updated to reflect emerging Metro proposals
 Т 4	Transport Interchanges	Policy functioning effectively and no changes considered necessary at present
Т 5	Design Principles for Transport Measures and Infrastructure	Policy functioning effectively – Minor updates to reflect need for incorporation of ELUV and Green Infrastructure
Т 6	Parking	Review required – Policy to be reviewed in light of Future Wales policy on zero parking provision in city and town centre locations
Τ7	Public Rights of Way and Recreational Routes	Policy functioning effectively and no changes considered necessary at present
Т 8	Canal Network	Policy functioning effectively and no changes considered necessary at present – Policy to be reviewed as part of emerging strategic regeneration priorities
Т9	Port and Docks	Policy functioning effectively and no changes considered necessary at present

Energy and Utilities	EU 1	Renewable and Low Carbon Energy Proposals	Policy is functioning effectively, but review required – The policy framework of EU1 and EU2 will need to be revisited in the light of changes to national policy and Future Wales. Future Wales will set out the WG policies for renewable energy schemes of 10MW and more under the Development of National Significance procedure. Large scale wind developments will be directed to the Pre Assessed Areas for Wind in Future Wales. A Renewable Energy Assessment will be required to support the RLDP to establish policies for the most appropriate locations for development of energy developments below 10MW. In addition the wording of the policies will be reviewed to reflect the energy hierarchy and reflection of the need that solar proposals affecting BMV land should be protected from development because of its special importance.
	EU 2	Renewable and Low Carbon Energy in New Development	See EU1 comments above
	EU 3	District Heating and Cooling	Review required– Given the requirement for heat networks to be considered as part of major development within Future Wales but also the identification of Swansea as one of many District Heat Network priority areas the scope of the policy will be reviewed.
	EU 4	Public Utilities and New Development	Policy functioning effectively and no changes considered necessary at present
	EU 5	Telecommunications and Digital Technology Infrastructure	Policy functioning effectively and no changes considered necessary at present
Resources and Public Health Protection	RP 1	Safeguarding Public Health and Natural Resources	Policy functioning effectively but minor updates required – Policy may need to refer to need for potential Health impact Assessments.

RP 2	Noise Pollution	Policy functioning effectively but updates required – Wording of policy to be reviewed in light of PPW emphasis on the need to create appropriate soundscapes and preserve soundscape quality rather than just a focus on noise pollution. Further it is expected that a new TAN 11 on Noise will be issued which will provide further elaboration on air quality, noise and soundscape in more detail providing greater detail as to how they should be addressed in development plans. Therefore, the terminology and scope of RC 2 will be reconsidered as part of the Replacement LDP. Similarly, consideration will be given to including reference to the Tranquil Areas Map produced by NRW
RP 3	Air and Light Pollution	Policy functioning effectively but updates required – Policy needs to refer to PPW 11, AONB Dark Sky Community nomination/designation and also may need to be amended in light of future Air Quality Management Area review.
RP 4	Water Pollution and the Protection of Water Resources	Policy functioning effectively but minor updates required – Policy needs to be amended to reflect that SUDS are mandatory for all new developments in Wales
RP 5	Avoidance of Flood Risk	<u>Revision required</u> - The new TAN 15 and Floodmap for Planning is due to come into force in 2023 which will provide a significantly different context for planning decisions compared to the existing framework. Given this, the policy will need to be reviewed to reflect the new TAN.

		Deliev functioning offectively - Coope of wording will be
		Policy functioning effectively – Scope of wording will be
		discussed with Environmental Health colleagues as part of
RP 6	Land Contamination	replacement LDP.
		Policy functioning effectively – Boundaries of Graig
RP 7	Land Instability	Trewyddfa will need to be reviewed for the proposals map.
	Sustainable Waste Management	
RP 8	Proposals	Policy functioning effectively and no change required
		Policy functioning effectively but updates required – Policy will
		need to reflect latest evidence from the regional monitoring
		report and amend references to TAN15 to reflect latest
RP 9	Landfill Sites	version which will be in place in 2023.
	Sustainable Waste Management For	
DD 40	Ŭ	Deliev functioning officially and no change required
RP 10	New Development	Policy functioning effectively and no change required
	Agricultural Land - Disposal of Inert	
RP 11	Waste	Policy functioning effectively and no change required
		Review Required – Policy needs review to reflect the need to
		provide apportionment regarding Regional Technical
	Sustainable Development of Mineral	Statement 2. Needs rewrite to reflect the need to provide
RP 12	Resources	apportionment re RTS2.
		Policy functioning effectively but will be reviewed for any
RP 13	Safeguarding Minerals	necessary updates
RP 14	Mineral Buffer Zones	Policy functioning effectively and no change required

## **Appendix 2: Status of LDP Allocations**

Ref No.	LDP Ref	Site name	Summary planning / build status	Ownership/ promoter of remaining unbuilt sites	Capacity
1	H1.01	Remainder at former Vetch Field (Phase 2), Glamorgan Street	Majority of the site is being used as a park. Small brownfield opportunities on car park areas off Madoc St at pre planning stage	Council	40
2	H1.02	Llwyn y Bryn Campus, Walter Road	No known activity at this stage to bring site forward	Private	200
3	H1.03	Townhill Campus, Townhill Road, Townhill	On site	-	160
4	H1.04	Land between Bog Road and Cefn Hengoed Road, Llansamlet	Planning application refused	Private	70
5	H1.05	Land at Upper Bank, Pentrechwyth	Under construction Further recent planning consent for 30 flats.	-	256
6	H1.06	Land at Jersey Road opposite numbers 16-38, Pentrechwyth	No known activity at this stage to bring site forward	Council	20
7	H1.07	Land at rear of 17-93 Carmel Road, Winch Wen	No known activity at this stage to bring site forward	Council	65
8	H1.08	Land at Ty Draw Road and Llanerch Road, Bonymaen	Pre planning stage	Council	55
9	H1.09	Land at Northern End of Graigola Road, Glais	No known activity at this stage to bring site forward	Council	25
10	H1.10	Land at Tanycoed Road, Clydach	Pre planning stage	Council	20
11	H1.11	Land at Ramsey Road, Clydach	No known activity at this stage to bring site forward	Private	60
12	H1.12	Talycoppa Farm, Llansamlet	No known activity at this stage to bring site forward	Private	150
13	H1.13	Land at Midland Place, Llansamlet	No known activity at this stage to bring site forward	Council	30
14	H1.14	Heol Ddu Farm, Birchgrove	Built	-	23

15	H1.15	Gwernllwynchwyth House, Llansamlet	No known activity at this stage to bring site forward	Private	50
16	H1.16	Land at Frederick Place, Llansamlet	No known activity at this stage to bring site forward	Council	20
17	H1.17	Former Four Seasons Club, Trallwn	Built	-	41
18	H1.18	Land at David Williams Terrace, Port Tennant	No known activity at this stage to bring site forward	Council	15
19	H1.19	Land east of Pontarddulais Road, Gorseinon	No known activity at this stage to bring site forward	Private	90
20	H1.20	Parc Melin Mynach, Gorseinon	Built	-	36
21	H1.21	Former Cefn Gorwydd Colliery, Gorwydd Road, Gowerton	Under construction	-	99
22	H1.22	Land at West Street (former Gorseinon Business Park), Gorseinon	Pre planning stage	Council	20
23	H1.23	Land at Carmel Road and Bryntirion Road, Pontlliw	Full planning application being determined	Private	100
24	H1.24	Land at the Poplars, Pontlliw	Full planning application awaiting decision	Private	12
25	H1.25	Beili Glas, Glebe Road, Loughor	Full planning consent	RSL	98
26	H1.26	Land at Former Penllergaer Civic Offices, Penllergaer	Built	-	80
27	H1.27	Land north of Llewellyn Road, Penllergaer	No activity at this time. Forms a potential later phase of adjacent site which has received planning consent	Private	50
28	H1.28	Remainder at Land East of Bolgoed Brickworks, Bolgoed Road, Pontarddulais	No known activity at this stage to bring site forward	Private	50
29	H1.29	Land east of Carreg Teilo, Pontarddulais	Pre planning stage	Private	30
30	H1.30	Land at Tyrisha Farm, Grovesend	Under construction	-	60
31	H1.31	Land off Brynafon Road and Gower View Road, Penyrheol	Under construction	-	144
32	H1.32	South Of Glebe Road, Loughor	Under construction	-	115
33	H1.33	Former Walkers Factory, Pontarddulais Road, Cadle	No known activity at this stage to bring site forward	Private	100

34	H1.34	Land adjacent to 114 Brithwen Road, Waunarlwydd	Majority of the site has full planning consent	RSL	15
35	H1.35	Land adjacent to Cockett Pond	No known activity at this stage to bring site forward	Council	50
36	H1.36	Penrhos Place, Gendros	Pre planning stage	Council	60
37	H1.37	Manselton Primary School, Manor Road, Manselton	Full planning application submitted	Private	30
38	H1.38	Land at Mynydd Garnllwyd Road, Morriston	No known activity at this stage to bring site forward	Council	95
39	H1.39	Land at rear of Glyncollen Primary School, Morriston	No known activity at this stage to bring site forward	Council	35
40	H1.40	Brayley Road, Morriston	No known activity at this stage to bring site forward	Private	15
41	H1.41	Land at Cadle, Fforestfach	No known activity at this stage to bring site forward	Private	50
42	H1.42	Land between Eppynt Road and Bettws Road, Penlan	No known activity at this stage to bring site forward	Council	10
43	H5.01	Land at Monksland Road, Scurlage	Pre planning stage	Council	25
44	H5.02	Land to the east of Gowerton Road, Three Crosses	No known activity at this stage to bring site forward	Private	15
45	H5.03	Land adjoining Tirmynydd Road, Three Crosses	Pre planning stage	RSL	20
46	H5.04	Land adjoining Pennard Drive, Pennard	Under construction	-	70
47	H5.05	Land at Summerland Lane, Newton	Built	-	61
48	H5.06	Land at Higher Lane, Langland	On site	-	31
49	SD 1.A	South of Glanffrwyd Road, Pontarddulais	Pre planning stage	Private	720
50	SD 1.B	North of Garden Village	Reserved Matters planning consent for the whole site	Private	705
51	SD 1.C	South of A4240, Penllergaer	Under construction	Private	850
52	SD.1.D	West of Llangyfelach Road, Penderry	Outline planning consent. Reserved Matters planning consent for Phases 1A & 3A and Spine Street	Private	1950
53	SD 1.E	North of Clasemont Road, Morriston	Pre planning stage	Private	600
54	SD 1.F	Cefn Coed Hospital, Tycoch	Pre planning stage	Other public sector	500

55	SD 1.G	Northwest of M4 Junction 46, Llangyfelach	Outline planning application being determined	Other public sector	800
56	SD 1.H	North of Waunarlwydd / Fforestfach	Outline planning application being determined for part of the site	Private	1319
57	SD.1.I	Swansea Vale	Pre planning stage	Council	450
58	SD.1.J	Central Area and Waterfront	Sites under construction and coming forward	Mixed	906
59	SD 1.K	Remainder of Fabian Way Corridor	Sites have been built and further planning applications being determined	Mixed	525
60	SD.1.L	Tawe Riverside Corridor and Hafod Morfa Copper Works	Copperworks mixed use sites being built. Skyline scheme at pre planning stage. No planning application received for residential development	Mixed	370

## **Appendix 3: Glossary and Abbreviations**

Term	Explanation
Affordable Housing	Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. Affordable housing includes social rented housing owned by local authorities and RSLs and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents (Planning Policy Wales)
Annual Monitoring Report (AMR)	Report to assess the extent to which policies in the adopted LDP are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations (2005)).
Baseline	A description of the present state of an area against which to measure change.
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the LPA as allocations in an emerging LDP.
Community Involvement Scheme (CIS)	Sets out how and when stakeholders and the community can become involved in the plan making process. The CIS forms part of the Delivery Agreement (see below)
Delivery Agreement (DA)	Is a succinct public statement that contains the Community Involvement Scheme (CIS) setting out how and when stakeholders and the community can become involved in the plan making process and a timetable for preparing/revising an LDP.
Deposit LDP	Is the Plan the Local Planning Authority (LPA) considers is sound and able to be adopted. Subject to a formal six week consultation period in which individuals and organisations can make representations on the Plan.
Evidence Base	Information / data to provide the foundation for the Plan's policies.
Green Infrastructure (GI)	The network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of GI can function at different scales. At the landscape scale, GI can comprise entire ecosystems such as wetlands, waterways and mountain ranges. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to GI networks.

Habitats Regulations Assessment (HRA)	The screening and appropriate assessment of options required under Part 6 Chapter 8 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) - a recognised iterative process which helps determine the likely significant effect on a plan or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a "European site" (see paragraph 5.1.2 of TAN 5), or as a matter of policy a proposed "European site" or Ramsar site, under the provisions of Article 6(3) of the EC Directive 92/43/ECC (the Habitats Directive), regulations 61 and 102 of the Conservation of Habitats and Species Regulations (as amended) 2010, and, regulation 25 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.
Integrated Sustainability Appraisal (ISA)	<ul> <li>A single integrated assessment which fulfils the requirements and duties for:</li> <li>Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA),</li> <li>Equalities Impact Assessment (EqIA),</li> <li>Health Impact Assessment (HIA),</li> <li>Welsh Language Impact Assessment (WLIA), and</li> <li>Well-being of Future Generations (WBFG).</li> </ul>
Inspector	The person appointed by the Planning Inspectorate to consider the LDP and undertake the Examination in Public.
Local Planning Authority (LPA)	A planning authority responsible for the preparation of a LDP.
Local Well-being Plan	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards have been established for each local authority area; and prepare a Well-being Plan.
Marine Plan	The Welsh National Marine Plan prepared under the Marine and Coastal Access Act 2009.
Mitigation	Measures to avoid, reduce or offset significant adverse effects.
Planning Obligation	A legal agreement between an applicant and the local planning authority to ensure a development is carried out in a certain way. Also referred to as a Section 106 Agreement
Planning Policy Wales (PPW)	Planning Policy Wales sets out the land use planning policies of the Welsh Assembly Government.
Pre-deposit stage	The participation and consultation stages prior to deposit (see above).
Short form revision (SFR)	May be appropriate for circumstances where the issues involved are not of sufficient significance to justify undertaking the full plan revision procedure.
Strategic Development Plan (SDP)	Provision is made under the Planning (Wales) Act 2015 for the preparation of SDP's at a regional level. SDP will have regard to Future Wales and respond at a regional level to strategic issues.

Strategic Environmental Assessment (SEA)	Term used internationally to describe environmental assessment as applied to plans and programmes. SEA process is derived from European legislation and defined at European level – Directive 2001/42/EC. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (SEA Regulations) require a formal "environmental assessment of certain plans and programmes, including those in the field of planning and land use"
Supplementary Planning Guidance (SPG)	Can have a key role in interpreting and expanding on generic policies in LDPs. All SPG should be derived from a LDP policy or, in the case of a master plan/ development brief, from a site allocation.
Sustainability Appraisal (SA)	Tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each LPA is required by S62(6) of the 2004 Act to undertake SA of the LDP. This form of SA fully incorporates the requirements of the SEA Regulations.
Sustainability Appraisal Report (SA Report)	A document required to be produced as part of the SA process to describe and appraise the likely significant effects on sustainability of implementing the LDP, which also meets the requirement for the Environmental Report under the SEA Regulations. S62(6) of the 2004 Act requires each LPA to prepare a report of the findings of the SA of the LDP The SA Report is first produced at the Preferred Strategy stage (the Interim SA Report), expanded at the Deposit LDP sta

#### Abbreviations

Acronym	Meaning
AAR	Average Annual Requirement
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
CJC	Corporate Joint Committee
DVM	Development Viability Model
FMfP	Flood Map for Planning
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
HIA	Health Impact Assessment
HiAP	Health in All Policies
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
ISA	Integrated Sustainability Appraisal
LA	Local Authority
LDP	Local Development Plan
LEAP	Locally Equipped Area of Play
LHMA	Local Housing Market Assessment
LPA	Local Planning Authority
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
MYE	Mid Year Estimate
NGA	National Growth Area
NPT	Neath Port Talbot
NRW	Natural Resources Wales
ONS	Office of National Statistics
PBSA	Purpose Built Student Accommodation

Acronym	Meaning	
PPW	Planning Policy Wales	
REA	Renewable Energy Assessment	
REDP	Regional Economic Development Plan	
REF	Regional Economic Framework	
RIGS	Regionally Important Geological Sites	
RM	Reserved Matters	
RSL	Registered Social Landlord	
RTS	Regional Technical Statement	
SA	Sustainability Appraisal	
SAC	Special Area of Conservation	
SDA	Strategic Development Area	
SDP	Strategic Development Plan	
SEA	Strategic Environmental Assessment	
SFCA	Strategic Flood Consequence Assessment	
SFR	Short Form Revision	
SHPZ	Strategic Housing Policy Zone	
SME	Small and Medium Sized Enterprises	
SMNR	Sustainable Management of Natural Resources	
SoNaRR	Second State of Natural Resources Report	
SPG	Supplementary Planning Guidance	
SuDS	Sustainable Drainage System	
SSSI	Sites of Special Scientific Interest	
SW	South Wales	
TAN	Technical Advice Note	
TNDIA	Tourism Needs and Development Impact Assessment	
WDQR	Welsh Development Quality Requirements	
WG	Welsh Government	
WLAP	Welsh Language Action Plan	
WLIA	Welsh Language Impact Assessment	
WLSA	Welsh Language Sensitive Area	
WPMR	Waste Plan Monitoring Report	