



Land to the North of Llewellyn Road
Penllergaer
Swansea

Planning Statement
Barratt Homes South Wales Ltd

DRAFT FOR PAC
APRIL 2021

A large green rectangular area containing the Barratt Homes logo at the top left. The logo consists of a circular icon with a house silhouette and the text 'BARRATT HOMES SOUTH WALES LTD' below it. The main text is centered and reads 'Land to the North of Llewellyn Road', 'Penllergaer', 'Swansea', 'Planning Statement', 'Barratt Homes South Wales Ltd', 'DRAFT FOR PAC', and 'APRIL 2021'.

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1.0 Introduction

1.1 This Planning Statement has been prepared by Barratt Homes South Wales Ltd (“the Applicant”) in support of a full planning application for 180 homes at Land north of Llewellyn Road, Penllergaer, Swansea (“the Application Site”). The full application description (“the Proposed Development”) is as follows:

“Full planning application for the erection of 180 no. homes with associated access, landscaping, open space, green infrastructure, drainage infrastructure and associated works”.

1.2 The purpose of this Planning Statement is to provide a coherent document outlining the detail of the application proposal, the planning policy context and the planning considerations relevant to the proposal.

1.3 This Planning Statement should be read in conjunction with all other supporting application documentation, as follows:

- Application Forms & Ownership Certificates;
- Covering Letter by Barratt Homes South Wales Ltd;
- Application Plans & Drawings (see enclosed schedule);
- Topographical Survey, September 2020;
- Engineering Layout by Phoenix;
- Drainage Plans by Phoenix;
- Tracking Plans by Phoenix;
- Planning Statement by Barratt Homes South Wales Ltd (April 2021);
- Design & Access Statement by The Urbanists, April 2021;
- Pre-Application Consultation Report by Barratt Homes South Wales Ltd (*to be prepared following PAC*);
- Transport Assessment by Vectos, April 2021);
- Travel Plan by Vectos, April 2021;
- Ecology Impact Assessment by Acer Ecology, April 2021 (Ref: P1743);
- Reptile Survey Report by EDP Ecology (in progress);
- Dormouse Survey Report by EDP Ecology (in progress);
- Drainage Strategy by Phoenix, April 2021;
- Archaeological Desk-Based Assessment by RSK ADAS, April 2021 (ref: ART69105-555 01);
- Tree Survey by Treescene, October 2020);
- Arboricultural Impact Assessment by Treescene, April 2021;
- Tree Retention and Removal Plan by Treescene, April 2021;
- Tree Protection Plan by Treescene, April 2021;
- Landscape and Visual Assessment by RPS, April 2021 (Ref: JSL3796_171);
- Noise Assessment by Hunter Acoustics, March 2021 (Ref: 6095/ENS1);

- Energy Assessment by Darren Evans Ltd, March 2021;
- Geotechnical and Geo-environmental Report (including Coal Mining Risk Assessment) by Terra Firma, February 2021 (Ref: 08/02/21-16300-ISSUE 1); and
- Welsh Language Impact Assessment and Action Plan by Barratt Homes South Wales, April 2021.

1.4 The Applicant has undertaken a Pre-Application Consultation exercise in line with the requirements of current legislation. Full details of the consultation undertaken by Barratt Homes is set out within the accompanying Pre-Application Consultation (PAC) Report (*to be prepared following PAC*).

1.5 This Planning Statement is structured as follows:

Section 1.0	Introduction	This Section introduces the Applicant and provides a summary of the Proposed Development.
Section 2.0	Application Site & Surroundings	This Section summarises the Application Site's characteristics, surroundings and physical opportunities and constraints.
Section 3.0	Planning History	This Section sets out the Application Site's planning history, as well as of neighbouring sites, and provides a summary of the pre-application advice received by the LPA.
Section 4.0	The Proposed Development	This Section introduces the Proposed Development in further detail, setting out a rationale for the design of the scheme in light of the identified opportunities and constraints.
Section 5.0	Planning Policy Context	This Section sets out the planning policy framework relevant to the Proposed Development including local and national planning policy as well as the requirements of the Well-being of Future Generations (Wales) Act 2015.
Section 6.0	Assessment of the Proposals	This Section assesses the Proposed Development against the requirements of the adopted development plan as well as any material planning considerations.
Section 7.0	Conclusions	This Section concludes and summarises the preceding Sections, demonstrating that the Proposed Development is acceptable and that planning permission should be forthcoming.

2.0 Application Site & Surroundings

- 2.1 The Application Site is located along the northern edge of Penllergaer, a village and community in the City and County of Swansea. It is situated 7 km north west of Swansea City Centre, approximately 0.5 km to the south of M4 Motorway Junction 47, alongside the A483 (which runs to the south towards Fforest-Fach and Swansea City Centre), and the A48/A4240 (which connects Gorseinon, 3 kilometres to the west, with Junction 47). Further south, the A484 connects with the A483 and runs west to Llanelli.
- 2.2 Penllergaer has a dispersed settlement structure, having grown along historic routes and subsequently the M4 and associated link roads constructed in the 1970s/80s. The settlement is predominantly residential in nature with facilities and services located along the main roads. There is a large area of open space in the centre and an extensive industrial/ trading estate to the south west.
- 2.3 The Application Site is located to the north of Llewellyn Road and is fairly regular in shape. It comprises two pasture fields with a combined area of 6.1 hectares. The fields were associated with an adjoining farm but they are no longer in agricultural use. The fields are bounded on the north, east, and west sides by hedgerows of variable quality and thickness with intermittent trees. A low hedge runs through the centre of the site in a north-south direction with a few small gaps and several mature trees. There is a small stream forming a ditch along the southern boundary, from east to west. Another small ditch runs along the western side of the dividing hedgerow. The topography of the site falls relatively steeply from north east to south west.
- 2.4 There are existing residential properties located to the south whose rear gardens extend northwards towards the southern boundary of the Application Site. To the east of the site is Coedwig-Hywel farm house and associated farm buildings. To the west of the site lies a small group of dwellings which include Gelli-hyll farmhouse, these dwellings have vehicular access from a track leading from Talbot Road. To the north and north-west of the site lies open countryside. A mobile phone mast is located in the north-eastern corner of the site and a small area within this part of the site was previously used for open cast coal mining (which ceased in 1960 and does not present a constraint to the site). Further to the south-east of the site lies a common which includes a playing field and children's equipped play park.
- 2.5 The main access is via a farm access road located off Gors Road to the east of the site whilst the proposed access to the Application Site is located off Llewellyn Road via an access spur into what is currently a cul-de-sac (Mount Crescent).
- 2.6 The Application Site lies within Flood Risk Zone A according to Natural Resources Wales' ("NRW's") Development Advice Maps ("DAMs") in support of Welsh Government Technical Advice Note 15 ("TAN15"). The Application Site is therefore considered to be at little or no risk of flooding. The site lies in the sub catchment of the Afon Lliw, which flows into the Carmarthen Bay SAC and Burry inlet SPA.

- 2.7 The Application Site contains no statutory or non-statutory cultural heritage designations. A review of the historic Wales maps identifies there are no listed buildings within or adjoining the site.
- 2.8 The wider area is mainly residential in character, although there are a number of local shops, services and facilities. These are mainly spread along the A4240 Gorseinon Road and include a community hall, public house, church and adjacent cemetery, a fuel station with a small convenience shop, a nursery, local post office and Premier convenience store. There is also a Lidl foodstore and a large industrial/ trading estate which provides a number of services and local employment. Outdoor recreational facilities include sports pitches adjacent to the community hall, and an extensive 'village green' north of Gorseinon Road which includes an equipped children's play area.
- 2.9 Further retail and other services and facilities are found within the defined District Centre of Gorseinon (3 km to the west). Gorseinon is also served by large Asda and Aldi supermarkets and a Home Bargains located just beyond the District Centre to the east.
- 2.10 In terms of education, the Application Site is situated 0.8km walking distance from the nearest primary school, Penllergaer Primary School, on Pontardullais Road. Further afield, Y.G.G Pontybrenin and Gower College Swansea are situated in nearby Gorseinon.
- 2.11 The site is also located in close proximity to the Parc Mawr strategic development site, which will include a new school and local centre. These will be within a walking distance of less than a kilometre or approximately 8-10 minutes.
- 2.12 In terms of public transport, frequent bus services stop along Llewellyn Road to the south and A4240 Gorseinon Road to the south west of the site. These include the no. 46 Gorseinon/Morrison, the no. 53 Swansea/Tircoed and the no. X13 Swansea/ Ammanford services, which operate regular services in both directions.
- 2.13 The nearest railway stations are located at Gowerton and Pontardullais. Regular train services are available from here to Swansea, Cardiff and Llanelli, providing access to a number of further employment opportunities.
- 2.14 Cycle paths and Public Rights of Way (PRoW) are located to the south and west of the site with a national trail running south approximately 1 kilometre to the site's western boundary.
- 2.15 The Application Site is therefore accessible to a range of services and facilities including employment opportunities by a range of sustainable transport modes (i.e. foot, cycle and public transport).
- 2.16 Furthermore, the site is committed for residential development in the adopted Local Development Plan (see Section 5.0 for further details), further demonstrating the sustainability credentials of the Application Site.

3.0 Planning History

3.1 In terms of the planning history of the Application Site, an outline planning application (with all matters reserved except access) for up to 200 dwellings was submitted by Taylor Wimpey in early 2011 (LPA ref: 2011/0345). The application was reported to Planning Committee in March 2015 and Members resolved to approve the application subject to a S106 agreement to secure on-site affordable housing provision and financial contributions towards education, maintenance of a LEAP and off-site drainage works. However, the S106 agreement was not signed as the applicant did not wish to progress the scheme and the application was eventually disposed of in 2018.

3.2 Further afield, to the south of the A4240 Gorseinon Road, Penllergaer, the Parc Mawr Strategic Development site (Bellway) was recently approved in January 2021 (LPA ref: 2018/2697/OUT). This is being built out by Bellway Homes and will provide upto 850 new homes in phases, together with a new primary school, local centre, community facilities, open space and other infrastructure. The hybrid permission included full consent for the erection of 184 dwellings and associated works as part of phase 1a of the development, which is expected to commence shortly.

Pre-application enquiry

3.3 A non-statutory pre-application enquiry (LPA ref: 2020/1946/PRE) in respect of a proposed residential development of 200 no. homes with associated access, landscaping, drainage infrastructure and associated works was submitted by the Applicant to the Local Planning Authority ("LPA") on 28th September 2020. Feedback from a number of officers was issued during October 2020. A virtual pre-application meeting took place on 5th November 2020 between the LPA and the Applicant's project design team where the comments were discussed in further detail. The LPA confirmed that from a policy perspective, the development of the site is considered to be acceptable in principle, however the proposed layout was deemed to be unacceptable as submitted in terms of design, placemaking and Green Infrastructure proposals. A further virtual 'workshop' meeting took place on 12th November 2020 to discuss the proposed masterplan and multi-functional Green Infrastructure.

3.4 A full written response was issued by the LPA on 20th November 2020. A summary of the pre-application responses requiring action and a brief response on how they have been addressed is contained in Appendix 1.

3.5 Following the pre-application process, the project design team reviewed the proposals and revised the design of the scheme accordingly, where appropriate. The number of proposed units was reduced to 180 in order to address the requirements for placemaking and Green Infrastructure. In addition, further technical meetings were held with the Drainage Authority in relation to SABs, and general agreement was reached regarding the proposed design and layout. In light of this, a comprehensive scheme has now been drawn up in general accordance with the feedback received at pre-application stage.

3.6 The Application Proposal is described in further detail in Section 4.0.

4.0 The Proposed Development

4.1 The Application Site measures approximately 6.1 ha. The full description of development is as follows:

“Full planning application for the erection of 180 no. homes with associated access, landscaping, open space, drainage infrastructure and associated works”.

4.2 As outlined in Section 3, pre-application advice was initially sought from the LPA in September 2020 for a larger development comprising 200 no. units. The concerns that were raised by the LPA during this process have been addressed in the reduced scheme that is now being progressed for full planning approval, as illustrated on the enclosed plans.

4.3 A comprehensive rationale for the design of the Proposed Development is set out within the accompanying Design and Access Statement by The Urbanists. This has been informed by a thorough review of the site constraints and opportunities, together with feedback obtained from the LPA at pre-application stage.

4.4 The Design Concept/ Vision for the site is to create a vibrant and attractive neighbourhood with a distinct sense of place as an integrated addition to Penllergaer village.

4.5 In summary, a series of key Design and Placemaking principles and features have been integrated into the Proposed Development to achieve this vision. These include:

- Creation of a connected, multi-functional Green Infrastructure network within the site;
- Retention of existing mature trees, hedgerows and vegetation and additional soft landscaping to maintain and enhance biodiversity and landscape setting;
- Sustainable Urban Drainage System, comprising a network of bio-retention verges, rain gardens, permeable paving and attenuation basins;
- Provision of key gateway open space, formal and informal open space and areas of naturalistic play throughout the site;
- A permeable layout that based on principles of legibility and ease of movement;
- Well-defined, welcoming, safe and inclusive streets and spaces with a distinct identity;
- Provision of a range and choice of housing (open market and affordable);
- Scale and density of development appropriate to the surrounding residential area;
- Use of 2.5 storey buildings, gable ends, corner turning properties, and enhanced materials and boundary treatments at key locations within the site to create interest;

- Safe and accessible pedestrian footways/ cycleways to enhance permeability and create Active Travel links beyond the site, enhancing accessibility to services and facilities.

4.6 An overview of the application proposals is set out below.

Residential

4.7 The Proposed Development comprises 180 no. new homes, including a range and mix of 1, 2, 3 and 4 bedroom two and two-and-a-half storey properties, which equates to a net density of around 30 dwellings per hectare. The precise mix is as follows:

Table 4.1 Residential Mix (Open Market)

House Type Name	No. Bedrooms	Net Floor Area	No. Units
Kenley	2	<i>TBC by architect</i>	48
Ellerton	3		30
Moresby	3		2
Kingsville	4		22
Ennerdale	3		11
Chester	4		19
Hesketh	4		7
Alderney	4		11
Radleigh	4		16
Andover	3		5
		Total	171

Table 4.2 Residential Mix (Affordable Homes)

House Type Name	No. Bedrooms	Net Floor Area	No. Units
Larch	3		1
Alder	1		4
Olive	2		3
Beech	3		1
		Total	9

Multifunctional Green Infrastructure

4.8 The consideration of Multifunctional Green Infrastructure (“GI”) has shaped the design and layout of the site. The GI Strategy prepared by The Urbanists contained within the Design and Access Statement illustrates the key GI proposals for the site, at all scales, including:

- Boundary hedges and majority of central hedgerow to be retained as far as possible and enhanced with native species to maintain green corridors;
- Proposed tree planting for ecological and amenity value, and feature trees in key locations to create landmarks and terminate key views;

- Planting within bio-retention areas to increase biodiversity and sustainably manage run-off water;
- Attenuation basins planted with meadow mixtures, creating biodiverse and attractive, yet functional drainage features;
- Proposed rain gardens planted with ornamental wildlife rich planting species;
- Centrally located Local Equipped Area of Play (LEAP) complemented by a recreational green route around perimeter of site featuring trim trail/ naturalistic play opportunities;
- Landscape character areas that correspond to the street hierarchy and open space;
- Proposed on-plot planting proposals.

Drainage System

- 4.9 As outlined above, a Sustainable Urban Drainage System (SuDS) is proposed, comprising a network of bio-retention verges, rain gardens, permeable paving and attenuation basins. The SuDS proposal is multi-functional and will contribute to the GI network within the site and the wider area. The SuDS features will create biodiversity opportunities and enhance the visual amenity of the Proposed Development.
- 4.10 In terms of foul drainage, it is proposed to discharge all foul flows from the site via a gravity system that is intended to be offered to Dwr Cymru Welsh Water (DCWW) under a S104 application.

Access, Circulation & Parking

- 4.11 Pedestrian and cycle access is provided via the site access with Mount Crescent, at the southern boundary of the site. The existing footways on Mount Crescent will be extended into the site. Cyclists are able to access the site via the carriageway of Mount Crescent or a shared foot /cycleway (Active Travel link) located on the eastern side of Mount Crescent and the internal road network within the site. The Active Travel link continues from the site access and runs east-west through the development. There is also the opportunity for an additional pedestrian link to be located further to the west along the southern boundary of the site, with the possibility of connecting to Talbot Road in the future. Ensuring that pedestrian connectivity is achieved forms a key part of the proposals, with a network of pedestrian footpaths proposed to run throughout the site, providing a permeable development that is attractive to pedestrians and well-linked to the surrounding area.
- 4.12 Vehicle access is also proposed into the site from Mount Crescent. The design of the access accounts for the existing Category A tree located within the site (ref. T39 in the accompanying Tree Survey by Treescene). It is proposed that a limited section of narrower carriageway is provided adjacent to the tree to minimise any road construction impact on the root protection zone of the tree. The narrowing provides priority to one direction of traffic, however at 4.1 m wide, it is sufficiently wide enough to allow two cars to safely pass each other. The design and location of this access is broadly in line with the previous proposal for the site, which was resolved to be approved by the LPA in 2015.

- 4.13 The junction of Mount Crescent with Llewellyn Road has been reviewed and a junction visibility splay of 2.4m by 40 m has been demonstrated.
- 4.14 The access road leads on to a main tree-lined spine road that runs in an east-west direction through the development site, from which a series of secondary streets and private drives are accessed.
- 4.15 Parking is provided through a mix of private driveways, parking courtyards, and integral and detached garages, as outlined on the enclosed Parking Strategy Layout, with frontage parking kept to a minimum. Visitor parking spaces are also provided in a number of well-overlooked locations around the site. The parking provision is generally in line with the adopted SPG Parking Standards, which are maximum standards.
- 4.16 A small parking area is also proposed adjacent to the site entrance to provide off-road spaces for residents of nearby Mount Crescent.
- 4.17 The development also takes into account the potential future development of the allocated land to the west by safeguarding a future access point into this site. Landowner access to the farm to the south-east of the site has been retained and integrated into the development in a positive way.

5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the adopted development plan for the area, unless material considerations indicate otherwise.

Adopted Development Plan

- 5.2 The Application Site lies within the administrative boundary of Swansea Council and therefore the statutory development plan for the area comprises the Swansea Local Development Plan (“LDP”), which was formally adopted by the Council in February 2019.

Sustainable development

- 5.3 The LDP Proposals Maps confirm that the Application Site is situated within the defined settlement boundary of Penllergaer and therefore the basic principle of new development is already established, as confirmed by Policy PS 1 (Sustainable Places) which states:

“In order to deliver sustainable places and strategically manage the spatial growth of the County, the delivery of new homes, jobs, infrastructure and community facilities must comply with the Plan’s sustainable settlement strategy that requires:

i. Development to be directed to the most sustainable locations within the defined settlement boundaries of the urban area and Key Villages...”

- 5.4 Moreover, the Application Site is identified as a commitment for housing development in the LDP (Appendix 8) on the basis of the previous resolution to grant permission for a residential development at the site (“Llewellyn Road, Penllergaer”) and its historic allocation in the previous Unitary Development Plan. The schedule at Appendix 8 of the LDP outlines an indicative capacity for 250 units to be delivered at the site over the plan period.
- 5.5 Land to the immediate west of the site is also allocated for housing development (Policy ref. H1.27 “Land to the North of Llewellyn Road”) with an indicative capacity of 50 units.

Placemaking

- 5.6 Key placemaking and design principles are set out in Policy PS 2 (Placemaking and Place Management). The policy sets out the elements of sustainable Placemaking considered essential to the delivery of the Plan’s Vision of creating sustainable, distinct communities that are supported by good quality infrastructure, community facilities and opportunities for recreation. The policy states 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.

The design, layout and orientation of proposed buildings, and the spaces between them, should provide for an attractive, legible, healthy, accessible and safe environment. All

proposals should ensure that no significant adverse impacts would be caused to people's amenity.

Depending on the nature, scale and siting of the proposal, development should also:

- i. Have regard to important elements of local heritage, culture, landscape, townscape, views and vistas;*
- ii. Ensure neighbourhoods benefit from an appropriate diversity of land uses, community facilities and mix of densities that in combination are capable of sustaining vibrancy;*
- iii. Create or enhance opportunities for Active Travel and greater use of public transport;*
- iv. Integrate effectively with the County's network of multi-functional open spaces and enhance the County's Green Infrastructure network;*
- v. Enhance public realm quality, incorporating public art where appropriate;*
- vi. Provide for a hierarchy of interconnected streets and spaces;*
- vii. Ensure active frontages onto streets and spaces to provide natural surveillance and character;*
- viii. Provide an accessible environment for all;*
- ix. Provide appropriate parking and circulation areas for cars, cycles, motor bikes and service vehicles;*
- x. Deliver new, and/or enhance existing, connections to essential social infrastructure and community facilities;*
- xi. Maximise opportunities for sustainable construction, resource efficiency and contributions towards increased renewable or low carbon energy generation;*
- xii. Avoid the loss of land and/or premises that should be retained for its existing use or as an area of open space;*
- xiii. Avoid unacceptable juxtaposition and/or conflict between residential and non-residential uses;*
- xiv. Ensure no significant adverse impact on natural heritage and built heritage assets;*
- xv. Ensure resilience is not undermined and does not result in significant risk to human health, well-being or quality of life;*
- xvii. Have regard to the implications for infrastructure and services.*

Sustainable Housing Strategy

- 5.7 Policy PS 3 (Sustainable Housing Strategy) confirms that the LDP provides for the development of up to 17,645 homes to promote the creation and enhancement of sustainable communities. The Strategy includes the allocation of Non-Strategic Housing Sites within, and on the edge of, established settlements.

Masterplanning

- 5.8 Policy SD 2 sets out a series of Masterplanning Principles which apply to all sites where there is capacity for 100 homes or more. The policy states that development must deliver a comprehensively planned, sustainable neighbourhood with a distinct sense of place that:

- i. Is founded on a comprehensive and coherent Placemaking approach that relates to a masterplan for the entire site that demonstrates:*
 - 1. a clearly structured walkable neighbourhood with a hierarchy of streets and spaces;*

2. *the provision of internal streets designed for low speeds, having regard to key pedestrian routes;*
3. *attractive and resilient new buildings that reflect positive aspects of local context;*
4. *connections to essential social infrastructure and community facilities, including access to District and Local Centres where appropriate; and*
5. *a phasing schedule to demonstrate the timely delivery of development and supporting infrastructure;*
 - ii. *Achieves net residential density across the site of at least 35 homes per hectare, with higher density residential and mixed uses located along public transport corridors and in focal areas, lower densities on rural/sensitive edges, and a range of densities elsewhere to meet different needs and create distinct character areas;*
 - iii. *Has sympathetic regard to, and successfully integrates, existing site features, topography, landscape, seascape and views to and from the site;*
 - iv. *Integrates key movement corridors, in particular to encourage Active Travel and use of public transport, including links to the wider area;*
 - v. *Creates a network of well-overlooked and legible streets and spaces that address townscape and community safety considerations and are not dominated by vehicles;*
 - vi. *Provides for multi-functional and connected Green Infrastructure that links to the wider area and provides opportunities for relaxation, play and recreation alongside ecological provision in accordance with the Fields in Trust requirements;*
 - vii. *Conserves and enhances biodiversity and natural heritage assets, with suitable buffers where required;*
 - viii. *Retains and integrates existing important trees and hedgerows, including local native species, to improve local biodiversity and maintain the existing landscape character;*
 - ix. *Integrates watercourses, ponds and other water management measures as appropriate within the public realm and landscape, including opportunities for sustainable drainage; and*
 - x. *Maximises sustainable development opportunities where possible in accordance with the Welsh Government Planning for Sustainable Buildings Guidance.*

Infrastructure

- 5.9 Policy IO 1 (Supporting Infrastructure) states that development must be supported by appropriate infrastructure, facilities and other requirements considered necessary as part of the proposal. Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.

Affordable Housing

- 5.10 Policy H3 (On-Site Affordable Housing) sets the percentage of affordable housing provision required in each of the Strategic Housing Policy Zones, subject to consideration of financial viability of the proposal. The Application Site is within the Greater North West zone which

requires 15% affordable housing to be provided on-site where feasible. Affordable Housing will be delivered through on-site provision, unless there are exceptional circumstances that justify its delivery by means of off-site provision and/ or commuted payments. Such proposals will be considered against Policy H4 (Off-Site Affordable Housing).

- 5.11 The supporting text to Policy H3 states that where the Council is satisfied that financial viability at the target percentages cannot be achieved and/or S106 agreement costs are particularly high, the affordable housing percentage agreed for a proposal may be lower than the target percentages stated in the policy. In such circumstances the Council will work collaboratively with developers to agree an appropriate proportion of on-site affordable housing provision for individual schemes. It also states that the LPA will take a fair and pragmatic approach to the consideration of the specific development variables that apply to each case, in order to ensure that the affordable housing provision that is sought will not make a scheme unviable. Any required negotiations between the Council and developer should be undertaken in an open and transparent manner and full disclosure of the viability evidence relating to the site will be required.

Historic and Cultural Environment

- 5.12 Policy HC 1 states that the County's distinctive historic and cultural environment will be preserved or enhanced by requiring high quality design standards in all development proposals to respond positively to local character and distinctiveness; identifying and safeguarding heritage assets, sites and their settings; supporting heritage and cultural led regeneration schemes; and safeguarding and promoting use of the Welsh language.

Welsh Language Sensitive Area

- 5.13 Policy HC 3 states that the Welsh language will be safeguarded and promoted throughout the County. Within the Welsh Language Sensitive Area the Council may subject major development proposals to a Welsh Language Impact Assessment. Planning applications for major developments on allocated sites within the Welsh Language Sensitive Area will be required to submit a Welsh Language Action Plan. This should set out the measures to be taken to protect, promote and enhance the Welsh language.

Social Infrastructure Policies

- 5.14 Policy SI 1 (Health and Wellbeing) states that health inequalities will be reduced and healthy lifestyles encouraged by complying with set criteria.
- 5.15 Policy SI 3 (Education Facilities) states that where residential development generates a requirement for school places, developers will be required to either provide land and/or premises for new schools or make financial contributions towards providing new or improved school facilities. Proposals for the development of new primary and secondary education must comply with specific criteria.
- 5.16 Policy SI 6 (Open Space) states that open space provision will be sought for all residential development proposals over 10 units in accordance with the policy principles and in accordance with relevant criteria relating to design and landscaping principles. The quantity,

quality and location of the open space contribution required will be determined against the most recent Open Space Assessment and Open Space Strategy.

- 5.17 Policy SI 8 (Community Safety) states that development must be designed to promote safe and secure communities and minimise the opportunity for crime.

Environmental Policies

- 5.18 Policy ER1 (Climate Change) states that in order to mitigate against the effects of climate change, adapt to its impact and ensure resilience, development proposals should take into account a number of factors. These include reducing carbon emissions; promoting energy and resource efficiency and increasing the supply of renewable and low carbon energy.

- 5.19 Policy ER 2 (Strategic Green infrastructure Network) states that Green infrastructure will be provided through the protection and enhancement of existing green spaces that afford valuable ecosystem services. Development that compromises the integrity of such green spaces, and therefore that of the overall green infrastructure network, will not be permitted.

- 5.20 Policy ER 8 (Habitats and Species) state that development proposals that would have a significant adverse effect on the resilience of protected habitats and species will only be permitted where the need for development outweighs the nature conservation importance of the site; where the developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts and; any unavoidable harm is minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not feasible, compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species must be provided.

- 5.21 Policy ER 9 (Ecological Networks and Features of Importance for Biodiversity) states that development proposals will be expected to maintain, protect and enhance ecological networks and features of importance for biodiversity. Particular importance will be given to maintaining and enhancing the connectivity of the ecological network. Development that could have an adverse effect on such networks and features will only be permitted where specific criteria are met.

- 5.22 Policy ER 11 (Trees, Hedgerows and Development) states that development that would adversely affect trees, woodlands and hedgerows of public amenity, natural/cultural heritage value, or that provide important ecosystem services will not normally be permitted. Where necessary a tree survey; arboricultural impact assessment; an arboricultural method statement; tree protection plan and/or scheme for tree replacement, including details of planting and aftercare will be required in support of a planning application.

Transport Policies

- 5.23 Policy T 1 (Transport Measures and Infrastructure) states development must be supported by appropriate transport measures and infrastructure and dependant on the nature, scale and siting of the proposal, meet specified requirements. Development that would have an

unacceptable impact on the safe and efficient operation of the transport network will not be permitted.

- 5.24 Policy T 2 (Active Travel) states that development must take opportunities to enhance walking and cycling access by incorporating within the site, and/or making financial contributions towards the delivery off-site. Developments must not have a significant adverse impact on Public Rights of Way or existing routes identified by the Active Travel (Wales) Act (2013) Swansea Integrated Network Map.
- 5.25 Policy T 5 (Design Principles for Transport Measures and Infrastructure) provides design criteria that the design of the new development, including supporting transport measures/infrastructure, must adhere to.
- 5.26 Policy T 6 (Parking) states that proposals must be served by appropriate parking provision, in accordance with maximum parking standards, and consider the requirements for cycles, cars, motorcycles and service vehicles.

Resources and Public Health Protection Policies

- 5.27 Policy EU 2 (Renewable and Low Carbon Energy Technology in New Development) states that development will be required to maximise the contribution of renewable or low carbon energy technology to meet the energy demands of the proposal, particularly for Significant Energy Consuming Developments. Residential developments on sites where there is capacity for 100 homes or more, and non-residential developments with a total floorspace of 1000 sq m or more, will be required to submit a comprehensive Energy Assessment to determine the feasibility of incorporating low carbon or renewable energy installations into the scheme and/or connect to renewable or low carbon energy technology and district heating networks.
- 5.28 Policy EU 4 (Public Utilities and New Development) states that development will be permitted where the utility infrastructure is adequate to meet the needs of the development. Development that requires new or improved utility infrastructure will be permitted where it can be satisfactorily demonstrated that the developer will make an appropriate contribution to secure the provision of the infrastructure.
- 5.29 RP 2 (Noise Pollution) states where development could lead to exposure to a source of noise pollution it must be demonstrated that appropriate mitigation measures will be implemented, and incorporated into the design of the development to minimise the effects on existing and future occupants. Noise sensitive development will not be permitted unless effective mitigation will prevent exposure to existing noise generating uses.
- 5.30 Policy RP 4 (Water Pollution and Protection of Water Resources) states that development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements to water quality. Sustainable drainage systems (SuDS) must be implemented wherever they would be effective and practicable.
- 5.31 Policy RP 5 (Avoidance of Flood Risk) states that in order to avoid the risk of flooding, development will only be permitted in line with Policy principles relating to matters including

areas at risk of flooding, increased flood risk, sustainable drainage systems (SuDS) and impacts on and maintenance of flood defences.

- 5.32 RP 6 (Land Contamination) states that development proposals on land where there is a risk from actual or potential contamination or landfill gas will not be permitted unless it can be demonstrated that measures can be taken to satisfactorily overcome any significant risk to life, human health, property, controlled waters, or the natural and historic environment.
- 5.33 Policy RP 10 (Sustainable Waste Management for New Development) states that development will be required to incorporate, as appropriate, adequate and effective provision for the storage, recycling and other sustainable management of waste, and allow for appropriate access arrangements for recycling and refuse collection vehicles and personnel.

Material Planning Considerations

National Planning Policy

- 5.34 National Planning Policy and guidance is a material consideration in the determination of planning applications. This is set out in Future Wales (“FW”), Planning Policy Wales (“PPW”) and a series of Technical Advice Notes (“TANs”).

Future Wales: The National Plan 2040 (FW) (February 2021)

- 5.35 FW, published by the Welsh Government (“WG”) on 24th February 2021, contributes the national tier of the Development Plan. It sits alongside PPW and sets the direction for strategic and local development plans for the 2020-2040 period. It sets out a strategy for addressing key national priorities through the planning system, based on the national planning principles and national sustainable placemaking outcomes set out in PPW, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.
- 5.36 Policy 2 (Shaping Urban Growth and Regeneration, Strategic Placemaking) sets out the requirement for a strategic placemaking approach to decision making and highlights principles to support planning authorities to shape urban growth and regeneration. The policy states that development should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with GI. FW makes clear that specific opportunities should be identified, including through GI Assessments, to ensure that GI is fully integrated into development schemes. To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations.
- 5.37 Policy 7 (Delivering Affordable Homes) recognises that affordable housing is currently a critically important issue in all parts of Wales and a shift in the delivery model is required by building them at scale and pace. It states that new housing should meet the needs of all members of society, especially those unable to afford to buy on the open market. Through

their Strategic and Local Development Plans, planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments.

- 5.38 Policy 9 (Resilient Ecological Networks and Green Infrastructure) requires all applications to demonstrate the actions that have been taken to maintain and enhance biodiversity, ecosystem resilience and green infrastructure assets, through innovative, nature-based approaches to site planning and the design of the built environment. This policy requirement is supported by the guidance in PPW that sets out the requirement for a ‘stepwise approach’ to considering biodiversity in the planning process and securing overall enhancement. The strategic focus of FW on urban growth requires an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable. Supporting text to the policy explains how the real-life importance of urban green spaces was demonstrated when people were restricted to taking exercise in immediately local green spaces during the COVID-19 lockdown.
- 5.39 Policy 12 (Regional Connectivity) sets out WG priorities in terms of improving and integrating active travel and public transport, in order to support sustainable growth and regeneration, and states that active travel must be an essential and integral component of all new developments, large and small. Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations. Supporting text to the policy cites the changes in the way people moved around towns and cities during the COVID-19 pandemic as being indicative of a more widespread potential to reduce use of cars and to allocate more space for walking and cycling. The policy promotes development in sustainable locations, designed to make it possible for everyone to make sustainable and healthy travel choices for their daily journeys.
- 5.40 Policy 13 (Supporting Digital Communications) sets out WG support for the provision of digital communications infrastructure and services across Wales. It states that new developments should include the provision of Gigabit capable broadband infrastructure from the outset, recognising that modern, reliable mobile telecommunications and fast broadband services are essential to our everyday lives, as highlighted by the number of people working and learning from home during the COVID-19 pandemic.
- 5.41 Policy 28 (National Growth Area - Swansea Bay and Llanelli) sets out how Swansea Bay and Llanelli National Growth Area (within which the application site is located) will be the main focus for growth and investment in the South West region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The policy states that the WG will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli’s strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

Planning Policy Wales (PPW) (Edition 11, February 2021)

- 5.42 PPW Edition 11 was adopted by WG in February 2021. It provides national land use planning policy which should be taken into account when preparing planning applications.

- 5.43 The primary objective of PPW, as set out at Paragraph 1.2, is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 5.44 In Section 1, PPW defines ‘Sustainable development’ as:
- “Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.”*
- 5.45 Paragraph 1.18 states that a plan-led approach is the most effective way to secure sustainable development.
- 5.46 Paragraph 1.22 states that up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.
- 5.47 The Well-being of Future Generations Act is explained further in Section 1 of PPW. The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development and the Act has established seven well-being goals which are intended to shape the work of all public bodies in Wales, as follows:
- A prosperous Wales;
 - A resilient Wales;
 - A healthier Wales;
 - A more equal Wales;
 - A Wales of cohesive communities;
 - A Wales of vibrant culture and thriving Welsh language; and
 - A globally responsible Wales
- 5.48 The concept of placemaking is central to PPW 11 and delivering on the aspirations of the Well-being of Future Generations Act and achieving well-being through plan making and development management decisions.
- 5.49 Section 2, *“People and Places – Achieving Well Being Through Placemaking”* defines placemaking as:
- “A holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense.*

Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.

Placemaking should not add additional cost to a development, but will require smart, multi-dimensional and innovative thinking to implement and should be considered at the earliest possible stage. Placemaking adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary and embed wider resilience into planning decisions.”

- 5.50 PPW explains how “Placemaking Wales” has been set up as an initiative to support the implementation of placemaking in Wales. The project is led by the Placemaking Wales Partnership – a multi-disciplinary group representing professions and organisations involved in shaping the built and natural environment in Wales. A Placemaking Wales Charter has been developed to reflect the collective and individual commitment of these organisations to support the development of high-quality places across Wales for the benefit of their communities (www.dcfw.org/placemaking/placemaking-charter). The Charter includes six placemaking principles that those who sign-up agree to promote as part of their support for placemaking.
- 5.51 Paragraph 2.15 states that the national sustainable placemaking outcomes (outlined in Figure 5) should be used to inform the preparation of development plans and the assessment of development proposals. The outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments. These outcomes, whilst highlighting the sustainable features of the place development plans and decisions help create, should be the starting point for plan makers and decision takers and be considered at the earliest possible opportunity.
- 5.52 PPW recognises that the Covid-19 Pandemic and the response to the issues it raised was one of the most complicated challenges ever faced. Paragraph 2.22 states that we must ensure that a post-Covid world has people’s well-being at its heart and considers how PPW contains the principles and policies needed for us to recover from this situation in a positive manner. In July 2020, WG published *Building Better Places* which pinpoints the most relevant policy priorities and actions to aid in the recovery, recognising the pivotal role that planners play in shaping our society for the future.
- 5.53 At a strategic level, traditional planning policy topics are clustered around four themes in PPW, which contribute individually to placemaking. These themes draw together the linkages between planning policies to make it clear how individual components contribute to placemaking, as illustrated in Figure 6 reproduced below:



5.54 Section 3, “*Strategic and Spatial Choices*” states that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.

5.55 Paragraph 3.4 states that meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales. These objectives can be categorised into five key aspects of good design, as summarised in Figure 8, reproduced below:



- 5.56 Paragraph 3.30 observes that in 2019, WG declared a climate emergency in order to coordinate action nationally and locally to help combat the threats of climate change. 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.
- 5.57 Section 4 “*Active and Social Places*” defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. Key issues in this theme include:
- *ensuring there is sufficient housing land available to meet the need for new private market and affordable housing and facilitating a range and choice of housing;*
 - *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society;*
 - *improving sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles; and*
 - *reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people’s health, by prioritising and increasing active travel and public transport.*
- 5.58 In terms of Active and Social Streets, Paragraph 4.1.21 states that well integrated green infrastructure, such as SuDS, street trees and verges, not only create a pleasant environment but can also achieve a range of other benefits, including pollutant filtering, urban cooling, water management and habitat creation. Such features should be included as part of a well-designed street layout.
- 5.59 In terms of Active Travel, Paragraph 4.1.31 states that Planning Authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.
- 5.60 With specific regard to housing, Paragraph 4.2.2 states that the planning system must enable the provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places and focus on the delivery of the identified housing requirement and the related land supply.
- 5.61 In terms of development viability, Paragraph 4.2.21 states that it is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision-maker, having regard to all the circumstances in the case, including whether the development plan and the viability evidence underpinning it are up-to-date, and any change in circumstances since the plan was adopted. Such circumstances could include, for example, where further information on infrastructure or site costs is required or where a recession or similar significant economic changes have occurred since the plan was adopted. Where negotiation is necessary, the planning authority and developer should operate in an open and transparent manner with all information provided on an ‘open book’ basis.

- 5.62 Section 6, “*Distinctive and Natural Places*” covers the environmental and cultural components of placemaking. Section 6.0.2 states:

“The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”

- 5.63 Paragraph 6.1.5 states that the historic environment is relevant to and is a vibrant part of the culture and economy of Wales. To enable the historic environment to deliver rich benefits to the people of Wales, what is of significance needs to be identified and change that has an impact on historic assets must be managed in a sensitive and sustainable way (Paragraph 6.1.7).
- 5.64 Paragraph 6.1.26 advises that, where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains.
- 5.65 In terms of Green Infrastructure, Paragraph 6.2.4 states that this plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. The planning system should protect and enhance green infrastructure assets and networks because of these multi-functional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision alongside the need to meet society’s wider social and economic objectives and the needs of local communities. The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design.
- 5.66 Section 6.3 relates to landscape and recognises that all the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.
- 5.67 Section 6.4 relates to biodiversity and ecological networks and states that the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement (Paragraph 6.4.3).
- 5.68 Section 6.6.9 relates to drainage infrastructure and advises that the adequacy of water supply and sewerage infrastructure should be fully considered when proposing development, both as a water service and because of the consequential environmental and amenity impacts associated with a lack of capacity.
- 5.69 Section 6.6.17 advises that new developments of more than one dwelling also require approval from the SuDS Approval Body (SAB) before construction can commence. Adoption and management arrangements, including a funding mechanism for maintenance of SuDS infrastructure and all drainage elements are to be agreed by the SAB as part of this approval.

This will ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

- 5.70 Section 6.6.18 states that the provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development.

Technical Advice Notes (TANs)

TAN 2: Planning and Affordable Housing (2006)

- 5.71 TAN 2 provides guidance on the planning system's role in the delivery of affordable housing. It requires local planning authorities to ensure that development plan policies are based on an up-to-date assessment of the full range of housing requirements across the plan area over the plan period. The need identified in the assessment should then form the basis of the authority wide target.

TAN 5: Nature Conservation and Planning (2009)

- 5.72 TAN 5 confirms that the planning system in Wales should integrate nature conservation into all planning decisions and to look for development or provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally (among other Key Principles).

TAN 11: Noise (1997)

- 5.73 TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development. It also sets out Noise Exposure Categories (NECs) to assist local planning authorities in their consideration of planning applications for residential development near transport related noise sources, and outlines various mitigation measures that can be introduced to limit exposure to noise.

TAN 12: Design (2016)

- 5.74 TAN 12 sets out five 'Objectives of Good Design' which include:

- Access;
 - Ensuring ease of access for all;
- Character;
 - Sustaining local character;
 - Promoting legible development;
 - Promoting a successful relationship between public and private space;
 - Promoting quality, choice and variety;
 - Promoting innovative design;

- Movement;
 - Promoting sustainable means of travel;
- Community Safety;
 - Ensuring attractive, safe public spaces;
 - Security through natural surveillance;
- Environmental Sustainability;
 - Achieving efficient use and protection of natural resources;
 - Enhancing biodiversity; and
 - Designing for change.

5.75 TAN 12 is considered further within the accompanying Design and Access Statement by the Urbanists.

TAN 15: Development and Flood Risk (2004)

5.76 As confirmed within Section 2.0 above, the Application Site falls entirely within Flood Risk Zone A according to NRW's DAMs. TAN 15 confirms that land within Flood Risk Zone A is "Considered to be at little or no risk of fluvial or tidal / coastal flooding" and therefore the justification test is not applicable and "there is no need to consider flood risk further".

TAN 18: Transport (2007)

5.77 TAN 18 reconfirms the Welsh Government's objective to minimise the need to travel, particularly by private car, and to encourage increased use of sustainable modes of travel including walking, cycling and public transport.

5.78 In respect of car parking standards, Paragraph 4.13 of TAN 18 stipulates that "Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels".

5.79 TAN 18 is considered further within the accompanying Transport Assessment by Vectos.

TAN 20: Planning and the Welsh Language (2017)

5.80 TAN 20 provides guidance on how the Welsh language may be given appropriate consideration in the planning system, both in terms of local plan preparation and development management.

5.81 TAN 20 is considered further in the accompanying Welsh Language Impact Assessment by Barratt Homes.

Supplementary Planning Guidance

- 5.82 Supplementary planning guidance is also a material consideration in the consideration of the application proposal. The relevant guidance adopted by the local authority is summarised below.
- “Places to Live” – Residential Design Guide (Adopted January 2014)
 - Parking Standards (Adopted March 2012)
 - Planning Obligations (Adopted March 2010)
 - Planning for Community Safety (Adopted December 2012)
 - The Protection of Trees on Development Sites (October 2016)
 - Planning and Biodiversity (Adopted 2021)
- 5.83 The proposed development will be assessed against the above planning policy considerations in the following section.

6.0 Assessment of the Proposals

6.1 This Section assesses the scheme against the planning policy framework set out within Section 5.0 to confirm whether the Proposed Development is acceptable in light of all relevant LDP policies and material planning considerations. Each issue is addressed in turn below.

Principle & Quantum of Development

6.2 As confirmed within Section 5.0 above, the Application Site is situated within the defined settlement boundary of Penllergaer and is identified as a housing commitment for residential development within the adopted LDP, based on its historic UDP allocation and the previous resolution to grant consent for housing in 2015. As such, the principle of new residential development is long established at the Application Site and the development will make an important contribution to housing delivery.

6.3 The proposal for 180 new homes at the Application Site is within the indicative capacity set out in the site schedule at Appendix 8 of the LDP, which specifies that the site could accommodate up to 200 homes. The lower density proposed is due to the need to retain existing green infrastructure where possible, create areas of open space and to comply with SuDS requirements.

6.4 Furthermore, the development of the site facilitates access to the adjoining site to the west, which is allocated in the LDP for 50 units (Site Ref. H1.27).

6.5 The Proposed Development is considered to be in accordance with Policy PS 1 of the adopted LDP.

Sustainability

6.6 The sustainability credentials of the Application Site have already been rigorously tested at local plan examination and through the resolution to grant outline planning permission for residential development.

6.7 The Application Site is sustainably located in close proximity to a wide range of local services and facilities, as outlined in Section 2.

6.8 Further afield, the Application Site is well connected by means of transport other than the private car, with bus stops within easy walking distance of the site which are served by a number of frequent services to Swansea, Gorseinon, Pontardullais and Morriston.

6.9 Footpaths and cycle links are proposed to be delivered which will link the Application Site to Llewellyn Road, providing safe and easy access to Penllergaer beyond.

6.10 Accordingly, the Application Site is sustainably located in close proximity to a wide range of local services and facilities by a range of transport modes, thereby reducing the reliance upon the private car. The site is inherently sustainable, is well-connected and is accessible by all modes of travel.

- 6.11 The Proposed Development therefore complies with Policies PS 2 and T 2 of the adopted LDP together with the objectives of FW, PPW and TAN 18.

Well-being of Future Generations (Wales) Act 2015

- 6.12 In terms of the well-being goals set out within the Well-being of Future Generations (Wales) Act 2015, these are summarised as follows:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

- 6.13 The Proposed Development will contribute to the above goals as it is located within an existing settlement which will enable people to access local services and facilities by means of transport other than the private car, reducing trip lengths for everyday journeys which will in turn reduce our carbon footprint. This will contribute to the creation of a more prosperous, resilient, equal, cohesive, healthier, globally responsible Wales. The Application Site is also accessible to primary and secondary Welsh-medium schools which will also help to contribute to a thriving Welsh language, in line with the requirements of Policy HC 3.

Highways

- 6.14 This full planning application is accompanied by a Transport Assessment and Travel Plan produced by Vectos. Section 2 of this Planning Statement demonstrates that the Application Site is sustainably located in close proximity to a range of services and facilities, including public transport services, thereby reducing the reliance upon the private car.
- 6.15 The supporting Transport Assessment by Vectos reconfirms the Application Site's sustainability credentials and confirms that the location of the site will positively integrate with the existing settlement and the existing transport infrastructure.
- 6.16 The Assessment confirms that the Proposed Development of 180 no. homes at this location would have no material impact upon the operation of the wider highway network. The TA has also undertaken sensitivity testing for the development of a further 50 homes on the allocated site to the west and has concluded that there will be no impacts, with local junctions continuing to operate well within their theoretical capacity.
- 6.17 Appropriate turning space is provided to allow refuse and service vehicles to enter and exit the Application Site in forward gear as demonstrated by the Swept Path Analyses submitted with the application. The proposal has also been subject to a Stage One Road Safety Audit which has not identified any insurmountable issues with the scheme.

- 6.18 The Proposed Development incorporates 473 parking spaces and 28 visitor spaces which is considered to be in general accordance with the adopted parking standards. Cycle parking can be provided safely and securely within the curtilage of the residential dwellings.
- 6.19 In terms of pedestrian access, the Proposed Development incorporates safe and accessible pedestrian footpaths linking to Llewellyn Road to the south, thereby ensuring safe access by foot to the services and facilities provided further afield in Penllergaer.
- 6.20 The Proposed Development integrates into the surrounding area by reinforcing existing connections and creating new ones. Connectivity for all users has been considered and the design of the scheme responds positively to this.
- 6.21 In terms of Active Travel, there are several services and facilities within a comfortable walking and cycling distance of the Application Site. Due to the site's location close to services and facilities, there is a probability that many of the trips generated by development can be made on foot.
- 6.22 The Proposed Development is well positioned to take advantage of existing and emerging sustainable/ active travel infrastructure and has minimal traffic effect on the local highway network.
- 6.23 The Proposed Development therefore complies fully with LDP Policies T1, T2, T5 and T6, together with the relevant policies and guidance contained within FW, PPW and TAN18.

Design

- 6.24 In terms of the design of the proposal, pre-application discussions focussed on the need to provide a high quality, GI-led development at the site. This is fully endorsed by the Applicant. In this regard, Barratt Homes is committed to delivering high quality, well-designed residential places, based on well-established design principles, ensuring that developments are attractive, work well for people and protect and enhance the local environment. This is demonstrated by our HBF 5 Star customer rating, the only major housebuilder to have been awarded this accreditation every year since 2010.
- 6.25 The design of the development has evolved from pre-application stage in a series of iterations of the proposed Masterplan. Through the loss of twenty units from the original scheme, a more appropriate layout has been accommodated at the site.
- 6.26 The Proposed Development has been designed to respond positively to the Application Site's local context and its constraints and opportunities, while ensuring key placemaking principles, community safety and amenity standards are adhered to and biodiversity interests are safeguarded. The design achieves a permeable and cohesive development that sits well within the existing context and provides an attractive place to live.
- 6.27 Full justification and rationale for the scheme's design is set out within the accompanying Design and Access Statement by the Urbanists.

- 6.28 The Proposed Development conforms to Policies PS 2, SD 2 and HC 1 of the adopted LDP as well as the relevant SPG “Places to Live” and supporting policies and guidance contained within FW, PPW and TAN12.

Housing Mix and Density

- 6.29 The proposed housing mix outlined in Section 4 will meet the identified needs within the local housing market and has been discussed with the LPA and RSL. A range of house types is proposed to add interest and variety to the development.
- 6.30 The Proposed Development of 180 homes on this 6.1 ha site equates to a Proposed Development density of around 30 dwellings per hectare. As noted in the pre-application advice, this lower density of development is considered to be appropriate for this suburban location. The proposed number of units has been reduced to 180 which has enabled the layout issues to be resolved with better integration of GI. Whilst the proposed density is lower than the LDP target for 35 dph, this is considered acceptable after careful consideration of the constraints and opportunities, such as the Green Infrastructure, topography and SuDS requirements. The density is also less than that of 50 dph defined in FW for ‘urban development’, however such a density target is not considered appropriate for this site on the fringes of a suburban environment.

Affordable Housing

- 6.31 LDP Policy H3 states that new residential developments (with capacity for 5 or more dwellings) located within the Greater North West housing zone are required to make a 15% contribution towards affordable housing, where feasible. The supporting text states that where the Council is satisfied that financial viability at the target percentages cannot be achieved and/or S106 agreement costs are particularly high, the affordable housing percentage agreed for a proposal may be lower than the target percentages stated in the policy.
- 6.32 Due to the financial viability constraints involved in the development of the site, it is proposed to provide nine affordable units, which equates to an on-site contribution of 5%. This level is considered to be appropriate, however this will need to be negotiated with the Council during the determination of the application in an open and transparent manner, with full disclosure of the viability evidence relating to the site. In this regard, we have appointed expert advisors and a comprehensive confidential Viability Assessment is submitted alongside this Full Application (*when the application is submitted to the Council after PAC*) to allow this matter to be agreed in an open and transparent manner with Officers at the Council.
- 6.33 The number of flats proposed within the development has been reduced to four units, with the remainder of the affordable properties being 2/3 bedroom homes to better meet the local housing need communicated to us at pre-application stage. The majority of the affordable homes will be offered on a social rented tenure, with some offered for Low Cost Home Ownership (LCHO). This will be discussed and agreed with the LPA Housing Officer.
- 6.34 The proposed affordable homes are positioned in three different locations throughout the development and integrate well with the scheme. The proposed affordable homes are

consistent with the open market homes in terms of their design and materials and as such are 'tenure blind'.

Flood Risk and Drainage

- 6.35 As confirmed within Section 2.0 above, the entire Application Site is situated within Flood Risk Zone A according to NRW's DAMs in support of TAN15, and therefore the Application Site is considered to be at little or no risk of flooding. TAN15 confirms that Flood Risk Zone A comprises an appropriate location for 'Highly Vulnerable' development such as housing and therefore there is no need to consider flood risk further. The Proposed Development is therefore fully consistent with Policy RP 5 of the adopted LDP and relevant guidance set out within PPW and TAN15.
- 6.36 The enclosed Drainage Strategy by Phoenix Engineers confirms that infiltration rates are poor at the site due to high clay content and conveyance channels are not suitable due to the steep nature of the site. This has informed the proposed surface water drainage strategy.
- 6.37 SuDS has been thoroughly considered for the site and discussed in detail with the local authority at pre-application stage. To allow sufficient treatment of the surface water, a combination of permeable paving, bio-retention areas and rain gardens with an underdrain will be utilised. Due to the location of the ditches along the site boundaries, the surface water can be discharged at a restricted rate. Attenuation will be via an open basin within each of the surface water catchment areas, with one basin being located to the south west of the site, and the second positioned to the south near the site access and within the POS. The attenuation has been designed for up to and including the 1 in 100-year storm event with 30% increase in rainfall intensity to allow for climate change.
- 6.38 The features of SuDS are designed to be multi-functional, and will enable enhanced green infrastructure and amenity space, provide habitats and wildlife corridors, and will contribute to health and wellbeing through providing important green space. The attenuation basins will have a dual function with appropriate planting to enhance biodiversity and, as such, they are considered to form part of the POS offer, providing opportunities for interaction with wildlife.
- 6.39 SuDS also supports development resilience to climate change, reducing the risk of localised surface water flooding. The scheme is also subject to legislation with regards sustainable surface water management and subject to SAB (Strategic Approval Body) approval via the local authority. An application has been submitted and is awaiting validation.
- 6.40 In terms of foul drainage, the site foul flows are to be drained via a gravity system that is intended to be offered to Dwr Cymru Welsh Water (DCWW) under a S104 application. The final point of connection will fall under a requisition to which DCWW has been instructed. The discharge of the foul water is subject to Surface Water removal under the remit of the Memorandum of Understanding (MoU) for which the investigations are underway.
- 6.41 The proposed drainage strategy is considered to be fully in accordance with Policy EU 4 and RP 4 of the adopted LDP, together with the objectives of PPW.

Biodiversity

- 6.42 The site has been subject to a number of ecological surveys, the most recent of which was undertaken by Acer Ecology in October 2020. The Phase 1 survey is included within the Ecological Impact Assessment enclosed with this application. This confirms that no parts of the site are considered to be of international or national value for wildlife. The main interest is the hedgerows within the site and the water course that runs along part of the southern boundary. There are also several boundary trees which have potential for bats and have habitat value, all of which are being retained.
- 6.43 Appropriate mitigation measures are recommended to avoid or minimise impacts to species including common reptiles, nesting birds, badgers, hedgehogs, and foraging, commuting and roosting bats. Further surveys to establish presence/likely absence of dormice, reptiles and bat activity are ongoing.
- 6.44 Species-rich hedgerows are identified as part of Swansea's Local Biodiversity Action Plan as priority habitats. Hedgerows are to be retained as far as possible and enhanced with native species to maintain green corridors for local wildlife around the perimeter and bisecting the development. The formation of a dark corridor will provide a commuting and foraging route for bats through the site.
- 6.45 The site falls within a designated B-Line, which is part of a network of connected habitats of ecological importance for maintaining viable pollinator populations. There are opportunities to improve the ecological connections for pollinators through the use of wildflower meadows.
- 6.46 A Stepwise process has been applied in accordance with FW, PPW and the SPG. The enclosed DAS demonstrates how the design of the site responds to the identified constraints and opportunities, the mitigation and compensation proposed in response and the enhancement for biodiversity net benefit proposed. Proposed mitigation and enhancement measures include the retention and enhancement of hedgerow corridors as an integral part of the GI network, biodiverse landscaping of SuDS features and the provision of bird bricks, nesting bird boxes and bat boxes. Full details of enhancement planting of the proposed SuDS features for biodiversity gain, and to aid ecosystem resilience, is indicated on the submitted Landscaping drawings and the Amenity & Biodiversity plan.
- 6.47 An appropriate Construction Environmental Management Plan for the management and monitoring of the biodiversity measures proposed can also be secured by condition.
- 6.48 In light of the above, it is considered that appropriate mitigation and enhancement measures can be incorporated into the Proposed Development such that any adverse impacts upon protected species will be minimised. The Proposed Development is therefore fully in accordance with Policies ER 2, ER 8, ER 9 and ER 11 of the adopted LDP, together with the biodiversity objectives of PPW and guidance in TAN5.

Arboriculture

- 6.49 As confirmed within Section 2.0 above, the Application Site contains a number of trees and hedgerows which are mainly limited to the field boundaries. An Arboricultural Survey and Arboricultural Impact Assessment have been prepared by Treescene which accompany this

planning application. The Survey confirms that the Application Site contains several trees within Categories A, B and C, the majority of which will be retained. Some trees are recommended for removal in the Tree Survey due to poor quality (Category U) and some limited sections of Category C (low quality) hedgerows are proposed for removal to accommodate the development layout (part of G30 for Plot 25 and associated highways works and part of G48 for internal roads).

- 6.50 Appropriate Root Protection Areas (RPAs) for the retained trees and hedgerows have been incorporated into the design proposals. In particular, the proposed development has been sensitively designed to retain the large Category A Oak tree at the entrance to the site. The AIA confirms that there are generally limited conflicts between proposed structures and RPAs of trees to be retained, apart from only minor incursions.
- 6.51 The existing robust tree belts on all boundaries of the site as well as the internal tree/hedge line are retained thus minimising any wider landscape impacts. Extensive new tree planting within the site is proposed thus mitigating any tree loss and contributing to an enhancement of the local tree stock as a result of the proposed development.
- 6.52 In light of the above, the Proposed Development is fully compliant with Policies ER 2, ER 9 and ER 11 of the adopted LDP, as well as relevant policies and guidance contained within FW, PPW and the relevant SPG.

Green Infrastructure, Landscaping and Public Open Space

- 6.53 The Development Plan, comprising FW and the LDP, places significant emphasis on the importance of placemaking and the integration of multifunctional Green Infrastructure (GI).
- 6.54 As set out in Section 4, the application is supported by a robust GI Strategy which has shaped the proposed layout of the development. It is set out in detail within the accompanying Design and Access Strategy prepared by the Urbanists, with input from the project team in terms of drainage, ecology, highways, landscaping and other disciplines, to ensure a holistic approach to its design. Current GI assets at the site are limited to existing hedgerows, perimeter trees and grassland, all of which is inaccessible to the public. The proposed GI strategy is structured into several character areas corresponding to the street hierarchy and proposed open spaces, and seeks to provide a high quality public open space network, play provision, biodiversity connections and bio-retention areas. This provides an overall enhancement through the delivery of the scheme.
- 6.55 At the neighbourhood scale of GI, the SuDs strategy is integrated with the Soft Landscaping strategy, which proposes retention of the majority of trees and hedgerows on the periphery of the site, together with biodiverse landscaping of drainage features. The SuDS strategy includes street side bio-retention areas with biodiverse planting schemes, and naturalistic attenuation basins. There are two distinct planting palettes for the bioretention areas, all of which include species that tolerate both wet and dry conditions, as detailed on the Amenity & Biodiversity Plan. At the local scale of GI, street trees are proposed within landscape build-out areas and native planting is proposed within front gardens. At the plot level of GI, generous gardens, boundary treatments and planting will increase ecological connectivity

between plots and enhance key ecological corridors. The GI Strategy demonstrates that the retained and enhanced GI features are well-connected and are multi-functional. The proposal therefore adequately addresses the PPW requirement for GI at all scales and to provide connectivity within the site, while ensuring the necessary drainage infrastructure can function efficiently.

- 6.56 In terms of open space requirements, LDP Policy SI 6 states that open space should be provided in accordance with Fields in Trust (FiT) standards. The most recent Open Space Assessment identifies that there is a total of 2.5 ha per 1,000 head of population of FiT provision within the ward in which the site is located (Penllergaer). This is provided across a range of parks, outdoor sports facilities and formal and informal recreation for children and teenagers. The FiT standard suggests that for each 1,000 residents there should be 2.4 ha of provision. The existing provision is therefore 0.1 ha over the recommended target, however the Open Space Assessment notes that Penllergaer has an over provision of outdoor sports facilities (1.8ha) and a deficiency of children's playing space and equipped playgrounds.
- 6.57 Notwithstanding the overprovision of open space with the local ward, the Application Proposal includes some 0.96 ha of formal and informal POS provision, in line with the recommended 2.4 ha per 1000 population. This includes a Local Equipped Area of Play ("LEAP") which is centrally located within the site (approximately 451 sq m in area), together with a series of LAPs, including trim trails and naturalistic play, informal areas of open space and ecological buffer zones around the site. The areas of open space are well-overlooked by the development to enable natural surveillance. Whilst the centres of the attenuation basins do not provide *useable* open space, they do however provide further opportunities for biodiversity and visual amenity.
- 6.58 Further areas of open space, LEAPs and LAPs will be provided within the nearby Parc Mawr strategic development which is being built by Bellway Homes. These areas will also be fully accessible to the occupiers of the development.
- 6.59 The Proposed Development is therefore fully compliant with Policies SI 6 and ER 2 of the adopted LDP and Policies 2 and 9 of FW, together with relevant guidance contained within the SPGs and PPW.

Landscape and Visual Appraisal

- 6.60 A Landscape and Visual Appraisal (LVA) has been undertaken by RPS to assess the potential landscape and visual effects of the Proposed Development. The LVA confirms that the application site is located on unused agricultural land which does not comprise any landscape or ecological designations, and is identified as a housing commitment in the LDP, immediately adjacent to an allocated site (H1.27). As such, the principle of limited residential development to the immediate north of Llewellyn Road exists within currently adopted local planning policy.
- 6.61 Overall, the LVA concludes that the Proposed Development would result in some local adverse visual effects, primarily on residential receptors to the immediate south along Llewellyn Road. Landscape and / or visual effects within the wider landscape would be minimal, with glimpsed

heavily filtered views available in winter, particularly from the north west, where the proposed development would be seen as a small extension to an existing settlement. With substantial boundary vegetation retained, the enclosed nature of the site would remain with glimpses of the proposed development being seen in the context of an already developed and evolving ridgeline.

- 6.62 The Proposed Development is therefore deemed to be acceptable from a landscape and visual perspective and is compliant with local and national planning policy.

Historic Environment

- 6.63 A Desk-Based Archaeological Assessment has been produced by RSK ADAS Ltd in support of the Proposed Development and accompanies this planning application.
- 6.64 The Assessment states that Cadw and the Glamorgan-Gwent Archaeological Trust record three designated heritage assets within the Study Area, however there will be no physical impact to any designated heritage asset due to the distance between the site and the nearest designated heritage assets. The Glamorgan-Gwent Archaeological Trust records twenty-nine heritage assets within 1 km of the Site. None of these heritage assets are recorded within the Site boundary. There will be no physical impact to any of these recorded heritage assets due to the distance between these heritage assets and the Application Site.
- 6.65 The available archaeological evidence suggests that there is a low general potential for currently unknown buried archaeological deposits from the prehistoric to medieval periods to be present on the site. The available archaeological evidence suggests there is a high general potential for currently unknown buried archaeological remains of post-medieval modern date to be present on the site. These remains are most likely to be field boundaries, hedgerows and a trackway shown on the 19th Century Ordnance Survey maps of the site. There is also a high potential for land drains and stray artefacts associated with the agricultural use of the land to be present on the site. These types of remains are considered to have a low archaeological value and are unlikely to be of such significance as to preclude development.
- 6.66 The assessment has established that historic environment impacts should not be seen as an over-riding constraint preventing the construction of this development. Therefore, it is considered to be acceptable in historic environment terms and in accordance with Policy HC 1 of the adopted LDP and Paragraph 6.1.26 of PPW.

Ground Conditions

- 6.67 A Geotechnical and Geo-environmental Assessment has been prepared by Terra Firma Wales Ltd and is submitted with the application. This details the site investigations that have been undertaken to date, and confirms that no contaminants were detected at the site in excess of the published Generic Assessment Criteria (GAC) for a residential setting with plant uptake.
- 6.68 The report also contains a Coal Mining Risk Assessment. In the west of the site (Zone 1), two coal seams were encountered at shallow depth. These seams were encountered intact and there was no evidence of these having been worked. In the centre of the site (Zone 3) no coal seams were encountered within 30m of the surface. In the East of the site, evidence of

backfilled opencast workings were encountered. Beyond the former opencast, no coal seams were encountered with the exception of one very thin seam encountered in RP14. Terra Firma Wales Ltd have not identified any subsidence risk associated with shallow underground workings and recommend re-engineering of the ground in the vicinity of the former opencast.

- 6.69 In conclusion, the site is considered to be suitable for residential development and there are no overriding issues in terms of land contamination or instability. The proposal is therefore compliant with LDP Policy RP 6 and the relevant guidance in PPW.

Energy and Sustainability

- 6.70 The Application Site is identified as a housing commitment within the LDP, was allocated for housing within the former UDP and had a resolution to approve a residential development of 200 units in 2015. The sustainability credentials of the Application Site have therefore been rigorously tested at local plan examination and through the resolution to grant outline planning permission for residential development. The site is inherently sustainable, is well-connected and is accessible by all modes of travel.

- 6.71 In response to the requirements of LDP Policy EU 2, and WG's declaration of a 'Climate Emergency' in 2019, an Energy and Sustainability Statement has been commissioned, prepared by Darren Evans Ltd, which reviews the sustainability performance of the Proposed Development against national and local policies.

- 6.72 The report, which is submitted with the application, shows how the Proposed Development has been designed in order to deliver significant carbon dioxide savings and reduce energy demand. In particular, the design team has sought to minimise emissions at source by the incorporation of the "Fabric First" approach utilising the principles of passive design, rather than through the use of renewables. Furthermore, sustainable design features such as high efficiency combi boilers coupled with advanced controls, as well as high efficiency lighting are proposed throughout to further reduce emissions and create comfortable living spaces.

- 6.73 All sustainable solutions for the development have been considered, and although there are some benefits to using renewables on this development, a fabric first approach outweighs these benefits and is considered to be the most beneficial long-term solution for the site. A number of different factors have been accounted for when using this fabric first approach and these are integral design factors such as bespoke PSI values, low thermal mass, low U-values and also high performing windows with low U-Values. All of these measures have contributed massively to the performance and energy efficiency of the dwellings making sure that there will be significant carbon savings and passive reductions for the lifetime of the buildings proposed.

- 6.74 Furthermore, it should also be noted that as a business, Barratt David Wilson Homes are the first national housebuilder to announce major new targets to reduce carbon emissions with the targets including:

- to achieve net zero greenhouse gas emissions by 2040
- 100% of own electricity to be renewable by 2025

- New home design to be net zero carbon from 2030

6.75 The submitted energy report and the calculations that have been carried out alongside this show compliance with the key regulatory and local planning policy targets, including Policy EU 2 and the objectives of FW and PPW.

Noise and Amenity

6.76 An environmental noise assessment by Hunter Acoustics has been carried out for the Proposed Development at the request of the LPA at pre-application stage, to consider any potential noise issues arising from the nearby farm to the south east and the M4 motorway approximately 0.5 km to the north.

6.77 The assessment confirms that the site in its undeveloped state is indicated to fall mainly under NEC A of TAN11. Table 1 of TAN11 states that for sites falling under NEC A, *“Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as desirable.”*

6.78 Standard thermal double glazing and trickle ventilation is indicated sufficient to control noise intrusion to habitable rooms to meet desirable levels. An assessment of external noise in gardens has been undertaken and shows that all gardens meet the $L_{Aeq,16hr}$ 55dB garden criterion.

6.79 An assessment of likely farm yard activity has also been carried out and it is concluded that occasional vehicular activity around the barns within the farm is unlikely to have a significant adverse impact on the amenity of the future residents of the development.

6.80 As such, the proposal is considered to be acceptable in terms of noise and amenity, and is in accordance with Policy RP2, Policy SD 2 of the LDP, PPW and TAN11.

Welsh Language Impact Assessment and Action Plan

6.81 As the Application Site is located within a Welsh Language Sensitive Area, Barratt Homes has produced a Welsh Language Impact Assessment which accompanies this application. The assessment considers it likely that a large proportion of buyers and affordable home occupiers will be Welsh in origin, with the majority from Swansea and West Wales, given the demographics of the purchasers of nearby developments. The proportion of Welsh speakers who live in the future development are likely to reflect the existing percentage of Welsh speakers in the local ward area. The Proposed Development is therefore likely to have an overall positive impact on the Welsh language. Whilst there is no need for any significant mitigation measures, some reasonable suggestions are set out in the assessment.

6.82 The Proposed Development is therefore considered to be fully in accordance with Policy HC 1 and HC 3 of the adopted LDP and the objectives of FW, PPW and the Wellbeing of Future Generations Act in terms of supporting a thriving Welsh Language.

Overall Consideration of Placemaking in the Application Proposal

- 6.83 The Application Proposal has considered the strong emphasis towards sustainable placemaking outlined in the LDP, FW and PPW11. As set out in Section 5, the concept of placemaking is central to the LDP, FW and PPW and delivering the aspirations of the Well-being of Future Generations Act is a key consideration. Placemaking is also considered essential to the delivery of the LDP's Vision of creating sustainable, distinct communities that are supported by good quality infrastructure, community facilities and opportunities for recreation.
- 6.84 Delivering good quality, well-connected places has a key role to play in supporting well-being, and enhancing people's physical and mental health. This has gained further impetus over the past year due to the COVID-19 pandemic and significant periods spent in lockdown, which have highlighted further the importance of the quality of the places in which people live and ease of access to green space and local facilities.
- 6.85 Barratt Homes is well-placed to deliver an appropriate, sustainable, high quality development for this important site. Barratt Homes (via the HBF) and the project designers at the Urbanists are signatories of the 'Placemaking Charter', which sets out the placemaking principles to be applied to all developments, demonstrating a commitment to delivering sustainable, high quality places for people to live.
- 6.86 Placemaking involves working collaboratively across various sectors and disciplines to comprehensively consider the design and delivery of the proposal. The multidisciplinary approach to the development of this Application Proposal, as outlined in the sections above, demonstrates collaborative working, which has ensured that matters relating to drainage, ecology, landscape, active travel, noise, open space and water quality have been considered holistically.
- 6.87 The constraints and opportunities of the site have been thoroughly considered by the project team and have influenced the design of the scheme, which has evolved from pre-application discussions with the LPA through to PAC and full application submission.
- 6.88 The Proposed Development provides multiple benefits through combining attractive properties and GI that promotes people's health and well-being. The GI Strategy detailed in the Design and Access Statement demonstrates that the retained and enhanced GI features, at all levels, are well-connected and are multi-functional.
- 6.89 In line with LDP Policy PS 2, the development responds positively to aspects of local context and character that contribute towards a sense of place. The design, layout and orientation of proposed buildings, and the spaces between them, provides an attractive, legible, healthy, accessible and safe environment. The proposal also ensures that no significant adverse impacts would be caused to people's amenity.
- 6.90 The Proposed Development is also compliant with the strategic placemaking principles set out in FW, particularly in terms of providing a variety of housing types and tenures; building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other; establishing a permeable network of streets, with a hierarchy that informs the nature of development and the integration of GI.

Planning Obligations / S106 Draft Heads of Terms

- 6.91 Planning obligations were discussed with the LPA at pre-application stage and a summary is included at Appendix 1. These will be negotiated further with the LPA during the course of the determination of the planning application and to assist this, the application is supported by a Viability Appraisal to reduce the provision of affordable homes and other S106 contributions to ensure the site is financially viable and can be delivered for housing.

7.0 Conclusions

7.1 Barratt Homes South Wales Ltd is seeking full planning permission for:

“The erection of 180 no. homes with associated access, landscaping, open space, green infrastructure, drainage infrastructure and associated works”

7.2 The Application Site is situated within the defined settlement boundary of Penllergaer and is a committed site for housing within the adopted LDP. The basic principle of new residential development is therefore already established at the Application Site.

7.3 The Application Proposal will deliver 180 much-needed, high quality homes at an appropriate mix, including detached, semi-detached, terraced and townhouse style properties, with generous gardens and curtilage parking. The layout sits comfortably within the overall built form of the area and the properties are at a scale and density appropriate to the character and appearance of the surrounding residential development.

7.4 Areas of open space are proposed throughout the site, including a gateway, focal public space with a LEAP and informal linear open space with a play trail along the site boundaries. These will provide benefits to future and existing residents in the vicinity and will be linked by footpaths and cycleways.

7.5 Existing trees and vegetation will be retained and additional, complementary new planting will enable the development to successfully integrate with the local surroundings. Enhancements to the existing boundary hedgerows along the northern and southern boundary of the site are proposed, which will include new native hedges and trees, and will ensure that the amenity of future and existing residents is protected. A number of ecological enhancements are also proposed, including the enrichment of existing planting on site with new native hedges and trees, a seeded wild flower area and attenuation areas in the southern part of the site.

7.6 The application submission is supported by a suite of technical assessments and plans that demonstrate the proposal is acceptable, as set out in Section 1.0.

7.7 Section 6.0 of this Planning Statement has confirmed that the Proposed Development generally complies with all relevant policies within the LDP as well as material considerations including relevant SPGs and national planning policy. Notably, a holistic approach to sustainable placemaking has been demonstrated in the design of the scheme and multifunctional Green Infrastructure at all levels is proposed.

7.8 This Planning Statement has also demonstrated how the Proposed Development meets the Well-being Goals as set out within the Well-being of Future Generations (Wales) Act 2015.

7.9 Accordingly, we respectfully request that planning permission is granted subject to the imposition of appropriately worded conditions, which we would be pleased to discuss with the Council during the determination of the application.

APPENDIX 1

Summary of Pre-application advice

Summary of Non-Statutory Pre-application Responses, issued 20th November 2020 / LPA ref: 2020/1946/PRE (brief response by BDW in red re. how issues have been addressed)

Placemaking comments

- No phasing schedule has been provided with the submitted information. To the west of the site is LDP non-strategic housing allocation (ref H1.27) for 50 units. The developer should consider how these sites are best masterplanned in combination to ensure an integrated neighbourhood is created at this location.
A Masterplan has been prepared and is submitted with the application. This shows access retained to adjacent housing allocation to the west (H1.27) to facilitate the future development of this site. This is explained and illustrated further in the submitted DAS.
- The pre-application is lacking in information given the size of development. The points set out below are based on the nature of information that has thus far been submitted, and encapsulates the placemaking requirements that the Council commonly seeks for new neighbourhoods proposed on major and strategic development sites.
The information that was submitted for pre-application discussion was the only information available at the time. Full details and a suite of the required technical reports are submitted with the full application submission.
- Policy SD 2 requires that development should seek to achieve net residential density across the site of at least 35 dph, on the basis of an appropriate range of densities being delivered, including higher densities located along public transport corridors and in focal areas, and lower densities integrated on rural/sensitive edges. The range of densities elsewhere should address different housing needs and create distinct character areas. Given that the site measures approx. 5.9ha the scheme equates to a density across the site of circa 34 dph, which is broadly acceptable as a total number. Notwithstanding this, based on the initial assessment of the draft scheme, in particular the POS deficiency, the amount and location of the proposed flats, and the requirement for the positive integration of SuDs features, density calculations are likely to evolve and may reduce. It is considered that there may be scope for a slightly higher density development having regard to the site's context, but only if additional flats were integrated in appropriate townscape locations.
Given the site constraints, it is not possible to build to a higher density here.
- Green Infrastructure (GI) is a central facet of the LDP and the placemaking approach. GI proposals, in accordance with Policy ER 2, should at the earliest stage consider all opportunities to maintain and enhance the multifunctional benefits of the County's GI network. The principle of "multi-functionality" is key. It will require a multidisciplinary approach to ensure that matters relating to drainage, ecology, active travel, open space, air/noise/light and water quality are all considered holistically and that each element of infrastructure proposed is designed in such a way to perform functions and provide benefits which go beyond their obvious primary function. In order for the Council to effectively appraise the proposals against the relevant LDP policies and the requirements of national policy, any subsequent planning application must clearly demonstrate how the elements of GI proposed are a reasonable and justified response to the constraints and opportunities identified on the site, and show how the development will maintain and enhance the GI network and deliver the key requirements of multi-functionality and connectivity. The applicant should be advised that the proposed GI features should be presented on a single plan/drawing within the DAS of a future planning application. Comments should be sought from the Council's Ecology and Tree Officers in relation to how the development addresses

GI, trees and biodiversity. GI proposals should demonstrate how they have responded to both the advice of Council officers and to the issues identified, and measures recommended, in the Tree and Ecology Reports.

GI has shaped the design of the proposed development and the revised plans and DAS show multifunctional GI incorporated at all levels. The majority of trees are retained at the site and are incorporated into the proposals.

It is disappointing that despite several calls, the County Ecologist has not been able to engage in any pre-application discussions, however the scheme has been progressed on the basis of the robust advice and measures set out by our ecologist in the submitted Ecology Report.

- Whilst the proposed layout works within the existing GI features at the site, namely the existing periphery hedgerow and trees and central green corridor, these features are not well integrated. For example the peripheral hedge which is shown as POS has no public access and the hedge forming the north south green corridor is unnecessarily truncated by plot 17. As part of the masterplan led approach required by policy SD 2 the starting point should be the preparation of a GI Strategy which is the fundamental starting point of any development of this scale. The GI Strategy must address GI at all scales; landscape/neighbourhood/street/plot and essentially informs the layout as a vital part of the overall placemaking led approach and should demonstrate the integration of GI at all scales.

These points have now been addressed – see enclosed plans and GI strategy

- From the proposed layout plan it is clear that, at ‘landscape scale’ the submission seeks to largely retain the key habitat connectivity corridors in the form of the periphery mature trees and hedgerow which needs to be supplemented by a perimeter public walkway as part of the outward facing edges.

A public ‘recreational route’ is now proposed around the perimeter of the site, see enclosed plans.

- With regard to the hedge in the centre of the site, the removal of a section of hedgerow to accommodate the main E-W spine route is acceptable, however the section south of this should be retained and the built form re-aligned to respect this existing feature. The proposed layout also shows the integration of several GI features at the neighbourhood and local scale, i.e. street trees, green verges, green spaces. Further details are required for full assessment. Plot scale detail has not been provided at this stage.

It is noted that the removal of a section of the hedge in the centre of the site is considered to be acceptable. The remainder of the hedgerow has been retained and incorporated into the development - see enclosed landscaping plans which also show GI network proposals at all levels for the site.

- Additionally, the GI Strategy should demonstrate that GI features are multifunctional, with the location and alignment of SuDs being designed in from the start. Two attenuation areas are shown to the south and SW of the site and provide opportunities for ecological features in accordance with multi-functional SuDs requirements. These are annotated as ‘ponds’ so are presumably wet areas and not useable? Footpaths should be provided around the periphery of these features and some form of seating provided, where appropriate. The layout includes a central dashed line in the green verges – are these swales? If they are, is it possible to include trees within swales? Swales/raingardens need to be connected together to create a drainage network that works with the typography and placemaking concept. Do the street widths accommodate these features? It is noted that the Council’s Drainage

Officer has identified that there are springs across the site that will need to be dealt with, as well as land drainage issues on the site that create overland flow paths on a regular basis. The drainage strategy should be explained in the DAS.

See Drainage Strategy, Plans and DAS for full details of the proposed SuDs features.

- In terms of the site context, the initial draft layout seeks to deliver outward facing edges and buildings fronting onto the central green corridor, however currently the proposal fails to adopt a fully legible and well-connected, walkable neighbourhood. With some relatively minor amendments to the layout, the overall connectivity of the site can be enhanced. Given the size of the site and requirement for a masterplan led approach, there should be no need for backland/ cul de sac arrangements. The removal of the existing turning heads/private drives to provide low status adoptable periphery streets / perimeter blocks would not only result in a more connected and legible place but by pulling the building line away from the boundary this would additionally allow for the provision of an active travel route around the edge of the site – this should be incorporated into the existing GI features and include walking / cycling routes / breakout areas for play / seating etc, and hereby provide an incidental area for play. The street network should accommodate combined cycle/pedestrian paths, along with SuDs features which provide the opportunity to soften the streetscene.

These points have been fully considered in the re-design of the scheme, see enclosed plans.

- In terms of wider connectivity, it is acknowledged that there are limited options to provide additional links into the site from the wider community, although the provision of an additional cycle/pedestrian link to the west of plot 10 is suggested and should be explored. **This is now shown on the proposed Masterplan**
- Linking into the above point, the current provision of POS across the site is deficient. The FIT standards for a development of this size require, as a minimum, the provision of numerous LAP's throughout the site, a LEAP and contribution to a MUGA. There should also be provision for informal open space. The centrally located LEAP is well positioned within an acceptable walking distance to all future residents. The min. size for a LEAP is 20 x 20m and consideration should be given to buffers of 20m between activity zone and dwellings. However no LAP's have been provided – these should be dispersed throughout the site and offer opportunities for informal play. The suggested changes to the street network / shift in building line would allow some informal play areas (naturalistic play) to be included throughout the perimeter route and this provision is considered to provide an acceptable level of informal POS across the site. The outward facing development would allow the POS to benefit from good levels of natural surveillance. **These comments have been fully considered and addressed in the revised layout which now shows a well-designed LEAP and several LAPs/trim-trails around the site with a focus on naturalistic play. The contribution towards a MUGA is noted and will be negotiated throughout the course of the application.**
- Notably the integration of affordable housing (AH) is poor and would not create a suitably integrated, mixed tenure community. The AH is located at the east end of the site adjacent to the phone mast and working farm. This includes flats which are not located in townscape locations. This approach is unacceptable as AH needs to be in clusters of no more than 6 homes and if AH flats are proposed (in acceptable townscape locations) then they should be mirrored by private flats. It is suggested that the AH are relocated to townscape/ corner locations along the E-W spine street, maybe some to the east and another block to the western part of the spine street? Where flats are provided they require private, useable

amenity space in the form balconies for upper floor units and a private terrace for ground floor flats.

AH has been relocated and is no longer in clusters and the proposed flats have private amenity space.

- No information has been provided on house types, design ethos or uplift strategy for the site. As a minimum it is expected that the frontages onto the main POS and main street will be treated with uplifts to house types, boundaries, materials, etc. Currently there is insufficient information to assess whether the proposed buildings will be attractive and resilient and reflect positive aspects of local context. It would help to see precedent images of similar Barratt Homes sites and to understand what character/ material variations are proposed.

Full details of the proposed housetypes are submitted with the application and full justification and design ethos is set out in the accompanying DAS. The uplift strategy for the site, which focusses on creating specific landscape character areas and 2.5 storey buildings, gable ends, corner turning properties, and enhanced materials and boundary treatments at key locations within the site, is also explained further in the DAS.

- The approach to parking across the site is broadly acceptable in the side drive configurations. However there are some areas of the site where the amount and location of frontage parking needs to be reviewed. Where frontage parking is included, softening is needed as is clear pedestrian access to front doors. This means that in many cases frontage parking will not be suitable for narrow fronted terraces or semi-detached, i.e. plots 26-34, 158-163 and these areas will need to be amended. Additionally, the location of some of the visitor parking raises concern, especially around the edges of the POS where it is likely to undermine natural surveillance of these spaces.

These points have been addressed in the revised layout with frontage parking kept to a minimum and where proposed, there is clear pedestrian access to properties. Visitor parking has been relocated and is proposed where there is good natural surveillance.

- To summarise in terms of placemaking matters, the approach proposed at the site to deliver outward facing edges and incorporate GI features is supported however there are various aspects identified that need to be addressed to get the 'building blocks' of the site correct. The fundamental starting point at the site must be the delivery of a multifunctional GI/SuD framework, which will inherently inform the layout and overall placemaking led approach in line with PPW and local policy.

A multifunctional GI/ SuDs framework is proposed which has informed the site layout and complies with placemaking principles set out in national and local policy, as demonstrated in the application submission.

- In the interest of good placemaking and in line with the aspirations of PPW, it is recommended that this scheme is referred for review with Design Commission for Wales (DCfW) for impartial scrutiny at this early pre-application stage in order to benefit from full exploration and testing of the response to the site, good placemaking and design quality. Due to time constraints and contractual obligations in relation to the application submission, this will not be possible.
- Affordable housing - The site is located in the Greater North West Strategic Housing Policy Zone (SHPZ). Policy H 3 sets out that on-site provision of affordable housing will be sought for residential development on sites with capacity for 5 or more dwellings at the target percentage of 15% in this Zone, subject to consideration of the financial viability of the

proposal. The amplification to Policy H3 states that “In certain developments,...where there are fewer constraints or requirements, such as a lack of S106 obligations, a higher percentage than that stated in the policy may be sought in exceptional circumstances. Conversely, where the Council is satisfied that financial viability at the target percentages cannot be achieved and/or S106 costs are particularly high, the affordable housing percentage agreed for a proposal may be lower than the target percentages stated in the policy. In such circumstances the Council will work collaboratively with developers to agree an appropriate proportion of on-site affordable housing provision for individual schemes.” It is noted that 30 affordable units are proposed which equates to 15% of the proposed number of 200 units in total. The type, size and location (see above placemaking comments) of the proposed affordable homes must be discussed with the Council’s housing department.

AH contribution is proposed to be reduced due to development viability issues which will be discussed during the course of the application.

- Drainage - In-line with Policy EU4, the proposal will need to demonstrate that the utility infrastructure is adequate to meet the needs of the development, and if it requires new or improved utility infrastructure, it can be satisfactorily demonstrated that the developer will make an appropriate contribution to secure the provision of the infrastructure. The Suds requirements will be a key element of agreeing the masterplan for the site. It will be important that detailed comments are provided from the relevant Council department(s) on the acceptability of the solutions identified. These comments should be referenced against the LDP policies listed above to assess compliance of the proposals.

A Drainage Strategy, which has been discussed in detail with the Drainage Officer, is submitted with the application. A full SABS application has been made.

- Highways and Active Travel - The transport requirements for this development are set out in LDP Policies T1, T2, T5, T6 and T7. Policy T 5 requires the accessibility of the site to be maximised by public transport and active travel, and for a safe and attractive environment for pedestrians, cyclists and other non-motorised modes. Comments will need to be provided by the Highways Department regarding the proposals.

The submitted Transport Assessment thoroughly considers the highways and accessibility issues and addresses the pre-app comments provided by the Highways Authority.

- Education - The LDP provides specific policies on education (SI 3) and the mitigation of impacts of development. It is expected that detailed comments will be provided from the Education department(s) for consideration. These comments should be referenced against the LDP policy listed above to assess the compliance of the proposals.

Education contributions will be fully considered and negotiated during the application process.

- Welsh language – the site is situated within the Welsh Language Sensitive Area (WLSA) designated on the LDP Proposals Map. Policy HC 3 states that within the WLSA the Council may subject residential developments for 10 or more dwellings on windfall sites to a Welsh Language Impact Assessment (WLIA). It is considered that for a site of this size a WLIA is necessary. TAN 20: Planning and the Welsh Language states: The LPA is responsible for conducting any assessment and for determining its form. The logical opportunity for conducting an assessment would be following pre-application discussions and before the submission of a planning application. The Council will seek to work with the applicant on this basis. Evidence from the WLIA may inform whether the LPA will require that measures to

mitigate or enhance the impacts of the development on the use of Welsh language are applied to any planning permission.

WLIA has been undertaken and the report is submitted with the application.

- Summary

This is a pre-application enquiry for the development of 200 homes in Penllergaer on a site that is within the urban settlement boundary defined in the LDP, and where proposals for residential development have previously received a resolution to grant permission. The development of a new neighbourhood at this location is thus supported in principle.

The adopted Swansea LDP aligns to PPW and requires a placemaking approach to development. Specifically relevant to this proposal are LDP policies PS 2 (Placemaking) and SD 2 (Masterplanning), with the latter relating to sites with capacity for 100 homes or more. These key policies of the Plan require that such proposals are comprehensively planned to form a sustainable neighbourhood with a distinct sense of place and character, in accordance with policy criteria and defined placemaking requirements.

The pre-application submission is lacking in information given the size of development, however based on the submitted information some initial Placemaking observations have been provided. To summarise the placemaking issues, whilst the approach to deliver outward facing edges and incorporate GI features is supported, there are various aspects that need to be addressed to get the 'building blocks' of the site correct. The fundamental starting point at the site must be the delivery of a multifunctional GI/SuD's framework, which will inherently inform the layout and overall placemaking led approach in line with PPW and local policy. The developer should also consider, and submit further details of, the tenure mix across the site, the design strategy, revised locations for higher density development, and a revised approach to POS and Play provision. In the interest of good placemaking and in line with the aspirations of PPW, it is recommended that this scheme is referred for review with DCfW for impartial scrutiny at this early pre-application stage in order to benefit from full exploration and testing of the response to the site, good placemaking and design quality. The site is situated within the Welsh Language Sensitive Area (WLSA). It is considered that for a site of this size a Welsh Language Impact Assessment (WLIA) is necessary. The logical opportunity for conducting an assessment would be following pre-application discussions and before the submission of a planning application. The Council will seek to work with the applicant on this basis".

The principles of placemaking have been embedded into our approach to the design and layout of the development - please refer to the DAS, Green Infrastructure Strategy Plan and Section 5 to confirm the benefits of our proposed development for future residents.

- Supporting Information - the following documentation will be required to accompany an application:

- Application Form
- Planning Fee
- Site plan, block plan, floor plan(s), full elevations, detailed landscaping scheme (all to a recognised scale) or outline parameters as required
- Pre-Application Consultation Report
- Design and Access Statement
- Masterplan for the site
- Transport Assessment (together with any mitigation measures for highway issues)
- Drainage Strategy
- Ecological Assessment
- Noise Assessment

- Tree Survey and Arboricultural Impact Assessment
- Coal Mining Risk Assessment
- Site Investigation
- Energy Assessment
- Green Infrastructure Strategy
- Welsh Language Impact Assessment

All of the above have been prepared and are submitted with the full planning application.

- Conditions/ S106 - the various consultation response give a likely indication of the required infrastructure contributions that would be requested for each application. Obviously this is subject to change depending on the timing of an application and the identified need at that time which may change. The previous S106 requests should not be used as a baseline for this application. Affordable Housing provision of 15% on site provision (DQR compliant) would also need to be secured as part of a S106 agreement along with the use of the Council's Bricks and Mortar Scheme (if being utilised). Should planning permission be granted, it is likely that conditions would be attached requiring materials to be submitted (unless these are fully detailed on the plans), any off-site mitigation provided (such as ecological/ noise/ contamination mitigation); implementation of a Travel Plan; details of any cycle parking provision on-site; external lighting strategy; details of road / p.o.s. maintenance; and a Construction Environment Management Plan (CEMP).

These will be discussed and negotiated with the Council during the course of the determination of the application.

- Please note that there is now a statutory duty for applicant's to undertake pre-application consultation on all planning applications for major development (such as this) prior to their submission. This would require you to make the application available publicly for 28 days prior to submitting the application, writing to any owner/ occupiers of adjoining land, advertising the application on site and consulting with relevant community and specialist consultees. You would then be required to prepare a Pre-Application Consultation Report that summarises all of the issues raised and how they have been addressed.

This has been undertaken and a PAC Report submitted with the full application.