




BARRATT
HOUSING GROUP PLC

Phase II, Chapel Fields

Land South of Glebe Road

Loughor

Swansea

Planning Statement

Barratt Homes South Wales Ltd

DRAFT FOR PAC

DECEMBER 2020



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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 23 homes at Land south of Glebe Road (Phase II), Loughor Swansea (“the Application Site”). The full application description (“the Proposed Development”) is as follows:

“Full planning application for the erection of 23 no. homes with associated access, landscaping, drainage 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;
- Engineering Layout by PHG (Ref: 2071-001-Rev G, November 2020);
- Planning Statement by Barratt Homes South Wales Ltd (December 2020);
- Design & Access Statement by Pegasus (Ref: P18-0751-47 B December 2020);
- Pre-Application Consultation Report by Barratt Homes South Wales Ltd (*to be prepared following PAC*);
- Preliminary Ecology Assessment by Acer Ecology (Ref: P1715, November 2020);
- Reptile Survey Report by Acer Ecology (Ref: P1715, November 2020);
- HSI Assessment by Acer Ecology (Ref: P1715, November 2020);
- Bat Activity Survey Report by Acer Ecology (Ref: P1715, November 2020);
- Landscape Masterplan by Pegasus (Ref: P18-0751_35 REV: B, November 2020);
- Green Infrastructure Strategy Plan by Pegasus (Ref: P18-0751_36, November 2020);
- Drainage Strategy and Flood Consequences Assessment by PHG (Ref: 2071 Rev C, December 2020);
- Archaeological Desk-Based Assessment by ADAS (ref: ART69105-410-01, December 2020);
- Tree Survey by Treescene (26/03/2020);
- Arboricultural Impact Assessment by Treescene (November 2020);
- Tree Retention and Removal Plan by Treescene (November 2020);
- Tree Protection Plan by Treescene (November 2020);
- Landscape and Visual Assessment by RPS (Ref: JSL3735 V2, December 2020); and

- Transport Statement by Acstro (Ref: November 2020);
- Welsh Language Action Plan by Barratt Homes South Wales Ltd (December 2020); and
- Site Investigation Report by (TBC).

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 in the south of Loughor, a village located within the county of Swansea, approximately 11km to the north east of Swansea City Centre. The urban area of Gorseinon is situated 1.5 km to the north east and the Loughor Estuary is situated 0.5 km to the west.
- 2.2 The site is fairly regular in shape and in terms of topography, it falls from north to south. The site is bounded to the north by the rear curtilages of residential properties on Glebe Road (B4620), to the west by the rear curtilages of residential properties on Greenfield Place, to the south by undeveloped agricultural fields, and to the east by Barratt Homes' existing residential development ("Chapel Fields") (see Section 3.0 for further details). The wider area is mainly residential in character, although there are a number of local shops, services and facilities.
- 2.3 The Application Site comprises approximately 0.9 ha of greenfield land. The site presently comprises agricultural grassland and is enclosed by hedgerows, trees and dense scrub. The northern part of the site has already been cleared, however, and currently contains the construction site compound for Barratt's adjoining residential development to the west.
- 2.4 Access to the site is via the Phase I Chapel Fields development by Barratt Homes, which is accessed via a mini-roundabout junction with Glebe Road to the north. There is an overgrown, unused access lane directly to the north which is beyond the red line application site.
- 2.5 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.
- 2.6 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. The nearest listed building is a cluster of three listed buildings associated with Capel Moriah each being Grade II listed. There is significant screening between the site and the Listed Buildings in the form of built development, trees/vegetation and topography.
- 2.7 The Application Site is considered to be sustainably located in close proximity to a wide range of local services and facilities. There is a Nisa Local Fuel Station and Convenience Store, a Place of Worship and a takeaway adjacent to the site entrance on Glebe Road. The Globe Inn Public House is situated 120m to the north east, a Community Centre is located 150m to the north, and a Post Office is situated 1km to the west. Further retail and other services and facilities can be found within the defined District Centre of Gorseinon (1.5 km to the north east). Gorseinon is also served by large Asda and Aldi supermarkets and a Home Bargains located just beyond the District Centre to the east. In terms of education, the Application Site is situated 600m from the nearest primary school (Tre Uchaf) and 600m from Gower College Swansea, Gorseinon Campus.
- 2.8 The nearest bus stop to the site is located adjacent to the wider site entrance on Glebe Road, approximately 100m walking distance from the site. This provides a twice-hourly service to

Swansea, Pontardullais, Gowerton and Gorseinon (route no. 16) and 2 hourly services (route no. 111 Kidwelly - Swansea via Burry Port, Llanelli & Gorseinon and route no. 46 Gorseinon - Gorseinon via Gorseinon Hospital). The nearest railway station is located at Gowerton, some 3km to the south east of the site. The railway station is served by hourly trains to the east (to Swansea and Cardiff) and to the west (to Llanelli and west Wales), providing access to a number of employment opportunities.

- 2.9 National Cycle Network (NCN) Route 4 runs through the lower west side of Loughor and continues to east to Swansea and Port Talbot and west to Llanelli. The cycle route can be accessed via Station Road approximately 1.4km from the site entrance.
- 2.10 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).
- 2.11 Furthermore, the allocation of the site for residential development under Policy H1. 32 of the adopted Local Development Plan (see Section 4.0 for further details) confirms the sustainability credentials of the Application Site.

3.0 Planning History

- 3.1 There is no planning history associated with the Application Site itself, however the Proposed Development comprises a second phase of a wider development by Barratt Homes which was granted outline planning permission by Swansea Council on 30th October 2017 (LPA ref: 2013/0617). Reserved Matters were approved on 5th September 2018 (access) and 6th December 2018 (appearance, landscaping, layout and scale) (LPA refs: 2018/0930/RES and 2018/1537/RES).
- 3.2 The Phase I scheme is designed such that access to the Phase II scheme has been safeguarded for future use. This access point is utilised as part of the Proposed Development, as demonstrated by the Site Layout drawing by Pegasus (ref: P18-0751_34 M).

Pre-application enquiry

- 3.3 A non-statutory pre-application enquiry (ref: 2020/1690/PRE) in respect of a proposed residential development of 25 no. homes with associated access, landscaping, drainage and associated works (Phase II) was submitted by the Applicant to the Local Planning Authority ("LPA") on 25th August 2020. Feedback from a number of officers was issued over the course of September and October 2020. The pre-application responses requiring action are listed below with a brief response on how they are addressed, whilst a full summary of the responses is contained in Appendix 1.

Strategic Planning Policy and Placemaking

- There are a number of significant issues with the proposed layout which fails to provide a good placemaking approach and is not supported in design terms. These issues centre around the overdevelopment of the site, the fragmented SUDS approach (which should be both functional as well as adding to the sense of place), the fragmented nature of the main street due to the dominance of frontage parking here, the small and tokenistic POS area as well as the highly prominent and awkward location of the proposed pumping station – *The number of proposed units has been reduced, whilst the car parking dominance along the main spine road has been addressed. The SUDS strategy has been discussed with the Drainage Officer and he is happy with the proposed approach. In relation to POS, as stated at the pre-application meeting, there is an over provision in the area and we have subsequently introduced a LAP on site to address concerns. As detailed at the pre-application meeting, the pumping station and attenuation basin need to be located at the lowest part of the site so then cannot be moved but to reduce the dominance of the pumping station, significant landscaping is proposed around the green mesh fence enclosure. Please also refer to the DAS, Green Infrastructure Strategy Plan and Section 5 of this document to confirm how the development complies with placemaking principles.*
- The scheme should be reconsidered from first principles, taking into account all of the above points in order to provide a well-thought out approach which benefits the future residents. *The principles of placemaking have been embedded into our approach and please refer to the DAS, Green Infrastructure Strategy Plan and Section 5 to confirm the benefits of our proposed development for future residents.*

- Any subsequent planning application must clearly demonstrate how the elements of green infrastructure (“GI”) proposed as part of the scheme 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. *Please refer to the DAS and GI Strategy Plan.*
- The proposed GI features should be presented on a single plan/drawing within the DAS. This will enable all functions and benefits of the GI proposed to be clearly communicated and assessed on how the development will maintain and enhance the GI network and deliver the key requirements of multi-functionality and connectivity. *Please refer to the DAS and GI Strategy Plan.*
- Proposals should also demonstrate how GI will contribute to placemaking of the development, particularly how landscaping and SuDS will contribute to the streetscene. *Please refer to the DAS and GI Strategy Plan*
- Any planning application will need to be accompanied by a Welsh Language Action Plan which sets out the measures to be taken to protect, promote and enhance the Welsh language. *Please refer to the Welsh Language Action Plan.*

Ecology

- Mitigation and enhancement measures will be required should the development adversely impact a number of protected species including nesting birds, bats, reptiles and hedgehogs. Further surveys are also advised for bats, reptiles and great crested newts. *The further surveys have been undertaken and appropriate mitigation is proposed. Please see the Preliminary Ecology Assessment by Acer Ecology (Ref: P1715, November 2020); Reptile Survey Report by Acer Ecology (Ref: P1715, November 2020); HSI Assessment by Acer Ecology (Ref: P1715, November 2020); Bat Activity Survey Report by Acer Ecology (Ref: P1715, November 2020); Landscape Masterplan by Pegasus (Ref: P18-0751_35 REV: B, November 2020); and Section 5 of this document for further details.*
- Full details of the ecological management plan for this area is required (*officers later clarified that this can be a pre-commencement condition*).
- The remaining peripheral hedgerows, trees and scrub should be retained and enhanced further by planting gaps with native species to improve habitat quality and to increase the extent. A Landscape and Planting Scheme is required. The scheme shall outline native species including tree, hedgerow, wildflower and scrub planting and aftercare. The use of species of known benefit to wildlife in any soft landscaping scheme associated with the development is essential, together with use of diverse seed mixes for lawns/ gardens to enhance the habitat for local birds and invertebrates and to provide connectivity with nearby habitats. *Such a scheme is enclosed and detailed on the Landscape Masterplan by Pegasus (Ref: P18-0751_35 REV: B, November 2020); with a summary provided in Section 5 of this document.*
- A sensitive lighting strategy is required. This should be designed to ensure that the habitats adjacent to the site and the retained/proposed habitat areas are not lit during the construction, or operation phases of the development. The strategy shall outline avoidance of impacts of lighting on bats, and other protected species. *This can be secured via an appropriately worded condition.*
- A scheme of Ecological Enhancement Measures (in the form of bird and bat boxes/bricks for a range of species to be provided within or to the walls of the dwellings and on suitable trees within the site, and other measures contained within the PEA and following the results of the

additional surveys, is required. *Such a scheme is detailed in the updated PEA with a summary provided in Section 5 of this document, and can be secured via a suitably worded condition.*

- Full details of enhancement planting of the proposed SuDS features for biodiversity gain, and to aid ecosystem resilience is required. *Such a scheme is enclosed and detailed on the Landscape Masterplan by Pegasus (Ref: P18-0751_35 REV: B, November 2020); with a summary provided in Section 5 of this document.*
- A CEMP shall be submitted to the LPA with any application, for approval (*officers later clarified that this can be a pre-commencement condition*).
- A Green Infrastructure Strategy is required, outlining the incorporation of GI at all scales (landscape, neighbourhood, local and plot) throughout the site. *A Green Infrastructure Strategy Plan by Pegasus (Ref: P18-0751_36, November 2020) is enclosed with the application submission.*

Highways

- Internal access road should be a minimum of 5.5 metres in width. Areas where manoeuvring off a perpendicular driveway could require 6.0 metres width, particularly with some of the angles as set out with the verges behind the footways. *The layout has been designed with this requirement in mind.*
- Access and circulation proposals should be supported with swept path analyses using appropriate vehicles for the area being assessed. In this case, refuse, removal and emergency vehicles in addition to private cars. *Vehicle tracking is enclosed with the application package.*
- Footways should be provided throughout the development at 2 m minimum on both sides of the carriageway, although the narrower provision is noted as service access at the end of the cul de sac. *The revised layout has been designed with this requirement in mind.*
- A Stage One Safety Audit of the layout should be undertaken and submitted with any application. *This will form part of the full application submission.*
- Parking must be provided in accordance with the adopted SPG and should be designed and located in such a way that it prevents the potential for overspill parking onto the existing adjacent highways or to inappropriate locations. *The SPG sets out a maximum car parking requirement and therefore the proposed level of car parking is considered to be appropriate and will prevent overspill parking whilst maintaining highway safety.*

Trees

- The trees on the northern and western boundaries are protected by TPO. Several trees require removal in the northern part of the site. Plot 1 is too close to the retained trees. The attenuation basin will affect trees. Construction is close to the trees on the southern boundary. These points will need addressing in an arboricultural impact assessment in accordance with BS5837:2012. *An Arboricultural Impact Assessment is enclosed with the application and the attenuation basin has been reshaped to reduce the impact on trees. Sensitive working practices will be employed to prevent construction impacts on the trees along the southern boundary.*

Drainage

- The development proposal will require SuDS Approval Body consent. Surface water drainage systems must be designed and built in accordance with mandatory standards for sustainable drainage published by Welsh ministers. These systems must have SABs approval before construction work begins. The SAB will have a duty to adopt compliant systems so long as it is built and functions in accordance with the approved proposals, including any SAB conditions of approval. *Barratt Homes is aware of the SUDs legislation and a separate SABs application will be made.*

Housing

- There are 4 affordable houses indicated on the plan which is in line with LDP policy. The number and dwelling type/size proposed affordable housing is acceptable but the location is not, they should not be grouped in one location. Affordable housing should be integrated into the overall development and should not be obviously segregated through location, layout or design. The affordable housing units should not be subject to service charges, they should be social rented tenure and must be transferred to the Council/RSL (to be determined). This site falls within the Loughor Ward, it is ACG band 2. – *The LPA accept clusters of up to 6 and a cluster of 4 units is consented on Phase 1. The request to break up the Affordable Housing units is not considered justified and a cluster of 3 remains on the updated layout. Furthermore, the RSL are happy with the proposed arrangement as detailed in section 5 of this document.*
- 3.4 A virtual pre-application meeting took place on 5th October 2020 and the comments outlined above were discussed in further detail with the LPA. In summary, 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 unacceptable as submitted and failed to comply with Placemaking principles.
- 3.5 Following the pre-application meeting, several meetings were held with the project design team and the matters raised in the pre-application comments were reviewed. The design of the proposal was revised accordingly. In addition, a further technical meeting was held with the Drainage Authority in relation to SAB, and general agreement was reached regarding the proposed design and layout.
- 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 0.87ha. The full description of development is as follows:

“Full planning application for the erection of 23 no. homes with associated access, landscaping, drainage and associated works”.

4.2 As outlined in Section 3, pre-application advice was initially sought from the LPA in August 2020 for a slightly larger scheme comprising 25 no. units. The concerns that were raised by the LPA during this process have now 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 & Access Statement by Pegasus. 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 In summary, a series of key Design and Placemaking principles and features have been integrated into the Proposed Development. These include:

- Creation of a connected, multi-functional Green Infrastructure network within the site, linking to the wider area;
- Retention of existing mature trees and vegetation and additional soft landscaping to maintain and enhance biodiversity and landscape setting;
- Creation of an ecological buffer zone to south, which also functions as open space, and will provide a green edge to the development and the adjacent fields;
- Sustainable Urban Drainage System, comprising a network of dry swales, rain gardens, permeable paving and attenuation basin;
- Provision of a Local Area of Play;
- Well-defined, welcoming, safe and inclusive streets and spaces;
- Provision of a range and choice of housing (open market and affordable);
- Continuation of visual character with adjacent Phase I - consistency in terms of scale, appearance and materials throughout the two schemes;
- Use of focal, dual aspect buildings at site entrance to create interest;
- Safe and accessible pedestrian footways to enhance permeability and create links to wider development and Glebe Road beyond, enhancing accessibility to services and facilities.

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

Residential

- 4.6 The Proposed Development comprises a second phase scheme of 23 no. homes including a mix of 2, 3 and 4 bedroom two-storey properties, which equates to a net density of 26 dwellings per hectare. The precise mix is as follows:

Table 4.1 Residential Mix (Open Market)

House Type Name	No. Bedrooms	Net Floor Area (Sq. M)	No. Units
Andover(detached)	3	998	1
Maidstone (semi-detached)	3	830	6
Moresby (semi-detached)	3	855	2
Alderney (detached)	4	1225	1
Chester (detached)	4	1032	4
Hemsworth (detached)	4	1152	2
Radleigh (detached)	4	1317	4

Table 4.2 Residential Mix (Affordable Homes)

House Type Name	No. Bedrooms	Net Floor Area (Sq. M)	No. Units
Olive (link)	2	870	2
Beech (link)	3	980	1

Green Infrastructure

- 4.7 The consideration of Green Infrastructure has shaped the design and layout of the site. The enclosed GI Plan by Pegasus ref: P18-0751_36 illustrates the key GI proposals for the site, which include:

- Existing vegetation to the boundary to be retained and enhanced;
- Proposed native/fruit trees;
- Proposed on-plot planting proposals;
- Attenuation basin sown with wetland tolerant wildflower grassland;
- Proposed dry swales sown with wetland tolerant wildflower grassland;
- Proposed rain gardens planted with ornamental wildlife rich planting species;
- Proposed filter drains;
- Ecology buffer zone;
- Local Area of Play;
- Protective tree fencing proposed during construction.

Drainage System

- 4.8 As outlined above, a Sustainable Urban Drainage System (SuDS) is proposed, comprising a network of dry swales, rain gardens, permeable paving and attenuation basin. 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.

- 4.9 In terms of foul drainage, it is proposed to discharge all foul flows from the site to the existing public combined sewer in Phase I. Due to the topography, foul flows from the site cannot drain via gravity. Subsequently a foul pumping station, situated at the southern end of the site, and rising main sewer, will be required to discharge the foul flows from the site. The pumping station needs to be located in this part of the site because it is the lowest part of the site.

Access & Parking

- 4.10 A new vehicular access is proposed via the approved Barratt Homes South Wales Ltd scheme to the north-west. Footpath links are provided through the site and link to the wider area.
- 4.11 Parking is provided through a mix of private driveways, parking courtyards, and integral garages, with 56 no. parking spaces provided in total. The parking provided is generally in line with the adopted SPG Parking Standards, which are maximum standards, and is consistent with the level of parking approved for Phase I of the development.

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 Loughor 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 forms part of a wider allocation for new residential development under Policy H1.32 (“Land South of Glebe Road”) with an indicative capacity for 130 units in the plan period. Phase I, which is currently under construction, comprises 92 units.

Placemaking

- 5.5 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

- 5.6 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.

Infrastructure

- 5.7 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

- 5.8 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. 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). The supporting text to Policy H4 states that

“commuted sum payments are likely to arise where the amount of affordable housing required contains a fraction of a unit”.

Historic and Cultural Environment

- 5.9 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

- 5.1 Policy HC 3 states that the Welsh language will be safeguarded and promoted throughout the County. 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

Open Space

- 5.2 Policy SI 6 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.

Community Safety

- 5.3 Policy SI 8 states that development must be designed to promote safe and secure communities and minimise the opportunity for crime.

Environmental Policies

- 5.4 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.
- 5.5 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.
- 5.6 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.

- 5.7 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.
- 5.8 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

- 5.9 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.
- 5.10 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)'s Swansea Integrated Network Map.
- 5.11 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.
- 5.12 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

- 5.13 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.

- 5.14 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.
- 5.15 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.
- 5.16 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

- 5.17 National Planning Policy and guidance is a material consideration in the determination of planning applications. This is set out in Planning Policy Wales (“PPW”) together with a series of Technical Advice Notes (“TANs”).
- 5.18 In addition, the draft National Development Framework (“NDF”) “Future Wales: the National Plan 2040” is currently before the Senedd for scrutiny and is expected to be in place by February 2021. This is a Spatial Plan which will sit alongside PPW and will set the direction for strategic and local development plans for the 2020-2040 period. Future Wales’ outcomes are overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in PPW.

Planning Policy Wales (PPW) (Edition 10, December 2018)

- 5.19 PPW Edition 10 was adopted by the Welsh Government in December 2018 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications.
- 5.20 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.
- 5.21 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.”

5.22 Paragraph 1.17 states that a plan-led approach is the most effective way to secure sustainable development.

5.23 Paragraph 1.21 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.

5.24 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

5.25 The concept of placemaking is central to PPW 10 and delivering on the aspirations of the Well-being of Future Generations Act and achieving well-being through plan making and development management decisions.

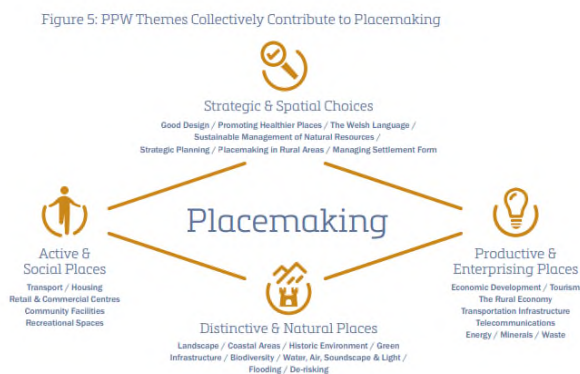
5.26 Section 2, *“People and Places – Achieving Well Being Through Placemaking”* defines placemaking as:

“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.

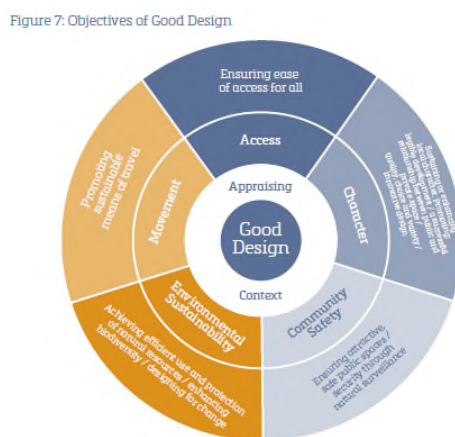
Placemaking should not add additional cost to a development, but will require smart, multi-dimensional and innovative thinking to implement and should be considered at the earliest possible stage. Placemaking adds social, economic, environmental and cultural value to development proposals resulting in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

5.27 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 5 reproduced below:



5.28 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.

5.29 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 7, reproduced below:



5.30 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.*

5.31 In terms of Active and Social Streets, Paragraph 4.1.20 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.

5.32 In terms of Active Travel, Paragraph 4.1.30 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.

5.33 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."

5.34 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).

5.35 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.

5.36 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.

- 5.37 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.
- 5.38 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).
- 5.39 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.
- 5.40 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.
- 5.41 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.

TAN 2: Planning and Affordable Housing

- 5.42 TAN 2 provides guidance on the planning system's role within 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.

Technical Advice Note 5: Nature Conservation and Planning (2009)

- 5.43 TAN5 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).

Technical Advice Note 12: Design (2016)

5.44 TAN12 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.

5.45 TAN12 is considered further within the accompanying Design & Access Statement by Pegasus.

Technical Advice Note 15: Development and Flood Risk (2004)

5.46 As confirmed within Section 2.0 above, the Application Site falls entirely within Flood Risk Zone A according to NRW's DAMs. TAN15 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".

Technical Advice Note 18: Transport (2007)

5.47 TAN18 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.

5.48 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*”.

5.49 TAN18 is considered further within the accompanying Transport Statement by Acstro.

Technical Advice Note 20: Planning and the Welsh Language (2017)

5.50 TAN20 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.

5.51 TAN20 is considered further in the accompanying Welsh Language Action Plan by Barratt Homes.

Supplementary Planning Guidance

5.52 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).

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 referred to within Section 5.0 above, the Application Site is situated within the defined settlement boundary of Loughor and forms part of a wider allocation for residential development within the adopted LDP. The principle of new residential development is therefore already long established at the Application Site. Moreover, the Application Site makes an important contribution to delivering the LDP housing requirement identified in LDP Policy PS 3.
- 6.3 Policy H1.32 confirms that the site in its entirety (i.e. including Phase I and Phase II) is allocated for 130 homes. A total of 92 new homes are set to be delivered on Phase I (see Section 3.0 for further details) and therefore the delivery of a further 23 homes at the Application Site is in line with the capacity set out in H1.32. Whilst development of the Application Site is proposed at a lower density to Phase I (26 dwellings per hectare), this has been informed by the need to respect TPOs, retain existing green infrastructure where possible, create areas of open space and to comply with SuDS requirements.
- 6.4 The Proposed Development is therefore in accordance with Policies H1.32 and PS 1 of the adopted LDP.

Sustainability

- 6.5 The Application Site is sustainably located in close proximity to a wide range of local services and facilities, as outlined in Section 2. In summary, the Application Site is located within walking distance of a convenience store, public house, hot food takeaway and community centre. Further retail and other services and facilities can be found within the defined District Centre of Gorseinon (1.5 km to the north east).
- 6.6 In terms of education and health facilities, the Application Site is located within close proximity (600m) to Tre Uchaf Primary School and 600m from Gower College Swansea, Gorseinon Campus. The Application Site has easy access to medical centres and dental practices in Gorseinon (Penybryn Surgery, Princess Street Surgery and Alexandra Road Dental Practice, Gorseinon) 1.2 – 1.3 km away.
- 6.7 Further afield, the Application Site is well connected by means of transport other than the private car, with the nearest bus stop situated less than 100m from the Application Site, which provides twice-hourly services to Swansea and Pontardullais. The nearest railway station is located at Gowerton, some 3km to the south east of the site. The railway station is served by hourly trains to the east (to Swansea and Cardiff) and to the west (to Llanelli and west Wales), providing access to valuable employment opportunities within close proximity to the Application Site.

- 6.8 A footpath link is proposed to be delivered through the Phase I site, which will link the Application Site to Glebe Road, which provides safe and easy access to Loughor, Gorseinon and the services and facilities referred to above. 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 Proposed Development therefore complies with Policies PS 2 and T 2 of the adopted LDP together with the objectives of PPW and TAN 18.

Well-being of Future Generations (Wales) Act 2015

- 6.9 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.

- 6.10 The Proposed Development will contribute to the above goals in that 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 (Y.G.Gwyr and Y.G.G. Pontybrenin) which will also help to contribute to a thriving Welsh language, in line with the requirements of Policy HC 3.

Access

- 6.11 This full planning application is accompanied by a Transport Statement produced by Acstro. 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.
- 6.12 The supporting Transport Statement by Acstro reconfirms the Application Site's sustainability credentials and confirms that the Proposed Development of 23 no. homes at this location would have no material impact upon the operation of the wider highway network. 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 in the TS. The proposal will be subject to a Stage One Road Safety Audit which will be submitted with the full planning application.

- 6.13 The Proposed Development incorporates 56 no. parking spaces conveniently located on-site, 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.
- 6.14 In terms of pedestrian access, the Proposed Development incorporates safe and accessible pedestrian footpaths linking to the Phase I scheme to the north and west and to Glebe Road to the north. The Proposed Development will utilise the improvements secured via the Phase I scheme, thereby ensuring safe access by foot to the services and facilities provided in Loughor and Gorseinon respectively.
- 6.15 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.
- 6.16 In terms of Active Travel, all of the services and facilities listed in paragraphs 6.5 – 6.6 above are within a comfortable walking distance of the Application Site. The site is accessible to pedestrians from the existing footways that run along both sides of highway. Due to the site's location close to services and facilities and the good quality pedestrian network that is available, there is a probability that many of the trips generated by development can be made on foot.
- 6.17 The Proposed Development therefore complies fully with LDP Policies T1, T2, T5 and T6, together with the relevant policies and guidance contained within PPW and TAN18.

Design

- 6.18 Barratt Homes is committed to delivering 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.
- 6.19 Full justification and rationale for the scheme's design is set out within the accompanying Design and Access Statement by Pegasus.
- 6.20 The Application Proposal is designed to complement the residential development approved and currently under construction at Phase I in terms of its scale, layout and appearance. The properties are two storey in height which is reflective of the surrounding residential context. The use of the same high quality palette of materials reflect those approved for Phase I and create a coherent visual character, linking the developments and reinforcing placemaking principles.
- 6.21 All boundary edges to the site have been properly considered, with appropriate frontages, set back distances and building scales, to ensure the visual and residential amenity of adjoining occupiers is not compromised.
- 6.22 The design of the development has evolved from pre-application stage and through the loss of two units from the original scheme, a more appropriate layout has been accommodated at the site.

- 6.23 The Proposed Development has been designed to respond positively to the Application Site's local context and its constraints and opportunities, while ensuring that community safety and amenity standards and biodiversity interests are maintained. The Proposed Development therefore conforms to Policies PS 2 and HC 1 of the adopted LDP as well as the relevant SPG "Places to Live" and supporting policies and guidance contained within PPW and TAN12.

Housing Mix and Density

- 6.24 The proposed housing mix outlined in Section 4 will meet an identified need for family homes and affordable housing. It has been discussed in detail with the LPA and RSL. A range of house types is proposed to add interest and variety to the development.
- 6.25 The Proposed Development of 23 no. homes on this 0.87 ha site (part of an existing allocation within the LDP) equates to a Proposed Development density of 26 dwellings per hectare. As noted at paragraph 6.3, this lower density of development is considered to be appropriate for the Application Site given the Green Infrastructure, topography and SuDS requirements, which are discussed in further detail later in this Section.

Affordable Housing

- 6.26 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.
- 6.27 The application proposal is for 23 units, and as 15% of this figure equates to 3.45 units, it is therefore proposed to make an on-site contribution of 3 no. units and an off-site financial contribution for the fraction of a unit (0.45), which will be negotiated during the determination of the application. This approach is compliant with Policy H4 of the LDP. The affordable homes will be offered on a social rented tenure, as discussed and agreed with the LPA Housing Officer.
- 6.28 The proposed affordable homes are centrally located within 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'. Whilst the three proposed units are situated together, this is the RSL's preference in terms of the future management and maintenance of the properties and falls below the maximum clustering number of 6 within the LPA. Relevant email correspondence with the RSL is reproduced at Appendix 2.

Drainage

- 6.29 The enclosed Drainage Strategy by PHG demonstrates how the drainage for the development will be discharged and how flows will be managed to prevent increased flood risk.
- 6.30 The surface water runoff generated during the extreme rainfall events up to the 1 in 100-year event plus 40% climate change allowance will be managed on site via a Sustainable Urban Drainage System (SuDS), comprising a network of private permeable paving units, rain gardens, dry swales, and attenuation basin, in the south-western corner of the Application

Site. The attenuation has been designed for up to and including the 1 in 100-year storm event with 40% increase in rainfall intensity to allow for climate change.

- 6.31 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. 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 (SuDS Approval Body) approval via the local authority. The SAB process will follow the pre-planning consultation and will include a pre-SAB and full SAB application.
- 6.32 The new Foul Pumping Station proposed to the south of the Application Site as part of this application will be enclosed with green meshweld fencing, as stipulated by DCWW, and will be suitably landscaped to soften the appearance.
- 6.33 The proposed basin and pump station are located at the lowest part of the site and fall outside of the Root Protection Areas (RPAs) of the retained trees adjacent to the south and west.
- 6.34 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.

Flood Risk

- 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.
- 6.36 The Proposed Development is therefore fully consistent with Policy RP 5 of the adopted LDP and relevant guidance set out within PPW and TAN15.

Biodiversity

- 6.37 A Preliminary Ecological Appraisal (PEA) was prepared by Acer Ecology in August 2020, which accompanies this planning application. This confirms that no parts of the site are considered to be of international, national, regional or district value for wildlife. The defunct species-rich hedgerows with trees at the periphery of the site qualify as 'Hedgerows', the majority of which are proposed for retention, with the exception of a small section in the north-eastern corner of the site. Provided that adequate protective measures are implemented to ensure that no accidental damage to trees or their roots take place during construction, there is considered to be good scope to ensure the long-term viability and enhancement of the hedgerows and trees.
- 6.38 The PEA confirmed that whilst the majority of the rank semi-improved grassland at the site will be permanently lost to the development, this loss is unlikely to have consequences outside of the footprint of the site, however it would be desirable to retain portions of this

- habitat if possible. The southern boundary of the site and the area surrounding the attenuation pond and pumping station was identified as a suitable location. The establishment of a 'wildlife protection zone' will ensure that the retained area of habitat is not damaged during the construction phase of the development. This recommendation has been taken forward in the design of the proposal and an ecological buffer zone is proposed to the south of the site which will be enhanced by the sowing of species-rich seed mixes to boost floristic diversity, as indicated on the submitted Landscape Masterplan (ref. P18-0751_35 REV: B).
- 6.39 In addition, full details of enhancement planting of the proposed SuDS features for biodiversity gain, and to aid ecosystem resilience, is indicated on the Landscape Masterplan and the GI Strategy Plan.
- 6.40 The PEA also found that the Proposed Development could potentially have adverse impacts of varying degrees on a range of legally protected species, including nesting birds, foraging/commuting bats, reptiles, hedgehogs and (albeit unlikely) great crested newts. Further surveys were therefore required to establish presence/ likely absence of reptiles and great crested newts, together with bat activity surveys during the summer and autumn months.
- 6.41 The recommended additional reptile and bat surveys were undertaken at the site by Acer Ecology throughout August, September and October 2020. These documents also accompany this planning application.
- 6.42 In summary, no reptiles were detected throughout the duration of the survey, indicating a likely absence of reptile populations on the site. It is considered, therefore, that there is a very low risk of encountering or affecting reptiles during the proposed works as they were not found to be present on site during the survey period. Therefore, no further survey or mitigation for reptiles is currently required.
- 6.43 In terms of great crested newts, the HSI assessment of the pond around 400m south of the site showed that it was unsuitable for supporting breeding great crested newts. This additional assessment by Acer Ecology is also enclosed with this application.
- 6.44 In terms of bat activity, surveys comprised two transect surveys (one in summer and one in the autumn), together with a total of 10 days of static monitoring - five days in the summer and five days in the autumn. Activity levels were low throughout the surveys. A number of bat species were recorded during the static detector surveys. A further survey is recommended and will be undertaken in Spring 2021.
- 6.45 Bird nesting opportunities within the site will be compensated for and enhanced by the incorporation of bird boxes on suitable retained features within the site, and on the fabric of the new built properties. This internal incorporation will ensure the long-term viability of these enhancement measures.
- 6.46 In order to enhance the site for use by roosting bats, two bat bricks will be installed upon the external elevations of the residential properties at the perimeter of the site.

- 6.47 The pre-application advice from the Ecology Officer recommends suitable planning conditions be attached to any consent to secure a Construction Environmental Management Plan, an Ecological Management Plan and a sensitive lighting strategy for bats.
- 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 which are limited to the field boundaries and a Tree Preservation Order (TPO) is in place. An Arboricultural Survey and Arboricultural Impact Assessment have been prepared by Treescene which accompany this planning application.
- 6.50 The Survey confirms that the Application Site contains several trees within Categories A, B and C which will all be retained. Appropriate Root Protection Areas (RPAs) for the retained trees within the peripheral hedgerows have been incorporated into the design proposals.
- 6.51 The Application Site contains a number of Category 'U' trees, many of which are Ash trees infected with Ash Dieback Disease (*Hymenoscyphus fraxineus*). Tree loss in relation to the development is negligible and focuses only on the clearance of Category 'U' trees that are unsafe/unsuitable for retention, irrespective of the planning layout. Some additional minor construction and access facilitation pruning work may be required once the site layout is approved and this would be detailed in a site specific Arboricultural Method Statement (AMS).
- 6.52 The AIA confirms that there are no conflicts between proposed structures and RPAs of trees to be retained apart from a small section of footpath within the northern fringe of the RPA of tree T30. The AIA advises that this is so minimal (less than 5% of the total RPA impacted upon) that it will not be detrimental to the future health of the retained tree.
- 6.53 The existing robust tree belts on the boundaries of the site are retained thus minimising any wider landscape impacts.
- 6.54 In light of the above, the Proposed Development is fully compliant with Policy ER 2, ER 9 and ER 11 of the adopted LDP, as well as relevant guidance contained within the relevant SPG and PPW.

Landscaping

- 6.55 In addition to the retention of the majority of trees and hedgerows on the periphery of the site, as outlined above, a soft landscaping scheme for the site has been carefully designed. This will include habitat enhancements for birds, foraging bats, and hedgehogs, through the provision of shrubs or trees that bear berries or nuts, as recommended in the submitted PEA by Acer Ecology. Native trees and shrubs that are indigenous to the region will be utilised, and

any new plantings of native species should be of UK provenance. Any ornamental hedgerows will utilise wildlife-friendly species. The southern boundary of the site will be planted with a native hedgerow to reinforce the existing boundary. These recommendations have been developed further within the Landscape Strategy for the site, which is illustrated further on the submitted Masterplan by Pegasus. A full planting schedule for the site is provided on the submitted GI Plan.

Open Space

- 6.56 In terms of open space, LDP Policy SI 6 requires open space to be provided in accordance with Fields in Trust (FiT) standards. The most recent Open Space Assessment identifies that there is a total of 4.8 ha per 1,000 head of population of FiT provision within the ward in which the site is located (Upper Loughor). This is provided across a range of parks, outdoor sports pitches 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 double the FiT standard at 2.4 ha over the recommended target.
- 6.57 Notwithstanding the overprovision of open space with the local ward, the Application Proposal comprises a total of 0.188 ha of open space. This includes a Local Area of Play (“LAP”) which is proposed to the north west of the site (approximately 230 sq m in area), together with an informal area of open space situated to the south of the site where the ecological buffer zone is located. The areas of open space are well-overlooked by the development. Whilst the attenuation basin to the south west of the site will not be *useable* open space, it does however provide opportunities for biodiversity and visual amenity.
- 6.58 Further areas of open space and a Local Equipped Area of Plan (“LEAP”) are provided in Phase I of the adjoining Chapel Fields development which will be fully accessible to the occupiers of Phase II. There is also an area of public open space adjacent to the Globe Inn which is accessible from the site.
- 6.59 The Proposed Development is therefore fully compliant with Policy SI 6 of the adopted LDP, together with relevant guidance contained within the relevant SPG 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. Overall, the LVA concludes that the Proposed Development would result in a minimal landscape and / or visual effect within the local area and be seen as a small extension to an existing development. 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.

Historic Environment

- 6.61 A Desk-Based Archaeological Assessment has been produced by ADAS in support of the Proposed Development and accompanies this planning application. The Assessment confirms that the Application Site contains no designated or non-designated recorded heritage assets.

The Application Site is considered to have a “*general potential*” for unrecorded archaeological remains, although these are considered unlikely to be of such significance as to preclude development.

- 6.62 The pre-application advice from GGAT recommends a planning condition requiring an archaeological watching brief to be conducted during ground intrusion works be attached to any consent.
- 6.63 The Proposed Development is therefore considered to be acceptable in historic environment terms and therefore is fully in accordance with Policy HC 1 of the adopted LDP and Paragraph 6.1.26 of PPW.

Welsh Language Action Plan

- 6.64 As the Application Site is located within a Welsh Language Sensitive Area, Barratt Homes has produced a Welsh Language Action Plan which accompanies this application. The Action Plan 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 the adjacent Phase I development. 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, therefore, some reasonable suggestions are set out in the Action Plan.
- 6.65 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 PPW in terms of supporting a thriving Welsh Language.

Overall Consideration of Placemaking in the Application Proposal

- 6.66 The Application Proposal has considered the strong emphasis towards sustainable placemaking outlined in both the LDP and PPW10. As set out in Section 5, the concept of placemaking is central to PPW and delivering the aspirations of the Well-being of Future Generations Act. 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.
- 6.67 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 in recent months due to the pandemic and periods spent in lockdown, which have highlighted further the importance of the quality of the places in which we live.
- 6.68 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, open space and water quality, have been considered holistically.

- 6.69 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.
- 6.70 The Proposed Development provides multiple benefits through combining attractive properties and green infrastructure that promotes people's health and well-being.
- 6.71 The submitted Green Infrastructure Strategy Plan demonstrates that the retained and enhanced GI features are well-connected and are multi-functional.
- 6.72 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.

S106 Draft Heads of Terms

- 6.73 The proposed development includes 15% affordable housing and it has been confirmed by the LPA that no education contribution is required. The Highway Authority has requested a sustainable transport contribution, the level of which will be subject to negotiation through the application determination.

7.0 Conclusions

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

“The erection of 23 no. homes with associated access, landscaping, drainage and associated works”.

7.2 The Application Site is situated within the defined settlement boundary of Loughor and is allocated for residential development within the adopted LDP. The basic principle of new residential development is therefore already established at the Application Site.

7.3 Section 6.0 of this Planning Statement demonstrates that the Proposed Development complies with all relevant policies within the LDP as well as material considerations including relevant SPGs and national planning policy. A holistic approach to sustainable placemaking has been undertaken in the design of the scheme and it is considered that the Proposed Development will have a positive impact on the character and appearance of the surrounding area. 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.

7.4 The Application Site will provide much-needed new open market and affordable housing while improving access to local services and facilities, and there are no technical constraints which would prevent its delivery. 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

Pre-application summary

Summary of non-statutory pre-application comments (LPA ref: 2020/1690/PRE)

- The principle of housing development on this land is long-established, having been allocated in previous development plans including the Unitary Development Plan. Following re-assessment of the site, it has been established through the LDP process that the principle of residential use on the site is appropriate and deliverable through the plan period and the site makes an important contribution to delivering the LDP housing requirement identified in Policy PS 3 and would enable the completion of the development of allocation H1.32.
- Appropriate development of the site will provide a welcome opportunity to deliver new open market dwellings and an appropriate number of affordable homes in line with the affordable housing policy target in the SHPZ.
- National and local planning policy now places significant emphasis on the importance of placemaking. The design of the proposal will need to be assessed having regard to the key placemaking and design principles set out in policy PS 2.
- There are a number of significant issues with the proposed layout which fails to provide a good placemaking approach and is not supported in design terms. These issues centre around the overdevelopment of the site, the fragmented SUDS approach (which should be both functional as well as adding to the sense of place), the fragmented nature of the main street due to the dominance of frontage parking here, the small and tokenistic POS area as well as the highly prominent and awkward location of the proposed pumping station.
- The scheme should be reconsidered from first principles, taking into account all of the above points in order to provide a well-thought out approach which benefits the future residents.
- Any subsequent planning application must clearly demonstrate how the elements of green infrastructure (“GI”) proposed as part of the scheme 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 proposed GI features should be presented on a single plan/drawing within the DAS. This will enable all functions and benefits of the GI proposed to be clearly communicated and assessed on how the development will maintain and enhance the GI network and deliver the key requirements of multi-functionality and connectivity.
- Proposals should also demonstrate how GI will contribute to placemaking of the development, particularly how landscaping and SuDS will contribute to the streetscene.
- The principle of “multi-functionality” is key to delivery of GI. 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.
- Any planning application will need to be accompanied by a Welsh Language Action Plan which sets out the measures to be taken to protect, promote and enhance the Welsh language.

Ecology

- Mitigation and enhancement measures will be required should the development adversely impact a number of protected species including nesting birds, bats, reptiles and hedgehogs. Further surveys are also advised for bats, reptiles and great crested newts.
- There is good scope to retain portions of habitat along the southern boundary of the site, and the area surrounding the attenuation pond and pumping station in the south-western corner.

The establishment of a wildlife protection zone will ensure that the retained area of habitat is not damaged during the construction phase of the development. It is advised that a sensitive management regime is employed for this zone to safeguard the area for flora, ground nesting birds, foraging bats, reptiles and other protected species.

- Full details of the ecological management plan for this area is required (*later clarified that this can be a pre-commencement condition*).
- The botanical enhancements of retained habitats detailed in the submitted PEA is welcomed and should form part of the Landscaping Strategy.
- The remaining peripheral hedgerows, trees and scrub should be retained and enhanced further by planting gaps with native species to improve habitat quality and to increase the extent.
- A Landscape and Planting Scheme is required. The scheme shall outline native species including tree, hedgerow, wildflower and scrub planting and aftercare. The use of species of known benefit to wildlife in any soft landscaping scheme associated with the development is essential, together with use of diverse seed mixes for lawns/ gardens to enhance the habitat for local birds and invertebrates and to provide connectivity with nearby habitats.
- A sensitive lighting strategy is required. This should be designed to ensure that the habitats adjacent to the site and the retained/proposed habitat areas are not lit during the construction, or operation phases of the development. The strategy shall outline avoidance of impacts of lighting on bats, and other protected species.
- A scheme of Ecological Enhancement Measures (in the form of bird and bat boxes/bricks for a range of species to be provided within or to the walls of the dwellings and on suitable trees within the site, and other measures contained within the PEA and following the results of the additional surveys, is required.
- Full details of enhancement planting of the proposed SuDS features for biodiversity gain, and to aid ecosystem resilience is required.
- A CEMP shall be submitted to the LPA with any application, for approval (*later clarified that this can be a pre-commencement condition*).
- A Green Infrastructure Strategy is required, outlining the incorporation of GI at all scales (landscape, neighbourhood, local and plot) throughout the site.

Highways

- Internal access road should be a minimum of 5.5 metres in width. Areas where manoeuvring off a perpendicular driveway could require 6.0 metres width, particularly with some of the angles as set out with the verges behind the footways.
- Access and circulation proposals should be supported with swept path analyses using appropriate vehicles for the area being assessed. In this case, refuse, removal and emergency vehicles in addition to private cars
- Footways should be provided throughout the development at 2 m minimum on both sides of the carriageway, although the narrower provision is noted as service access at the end of the cul de sac.
- A Stage One Safety Audit of the layout should be undertaken and submitted with any application.
- Parking must be provided in accordance with the adopted SPG and should be designed and located in such a way that it prevents the potential for overspill parking onto the existing adjacent highways or to inappropriate locations.

- Parking must be provided within the curtilage of each proposed unit. Garages will only be considered as parking spaces if they meet the minimum clear internal dimensions of 6 metres by 3 metres (for single garages). These must also be accompanied by a minimum of 6 metres length of driveway, which is not less than 3.6 metres in width.

Trees

- The trees on the northern and western boundaries are protected by TPO. Several trees require removal in the northern part of the site. Plot 1 is too close to the retained trees. The attenuation basin will affect trees. Construction is close to the trees on the southern boundary. These points will need addressing in an arboricultural impact assessment in accordance with BS5837:2012.

Drainage

- The development proposal will require SuDS Approval Body consent. Surface water drainage systems must be designed and built in accordance with mandatory standards for sustainable drainage published by Welsh ministers. These systems must have SABs approval before construction work begins. The SAB will have a duty to adopt compliant systems so long as it is built and functions in accordance with the approved proposals, including any SAB conditions of approval.

Pollution Control

- The Pollution Control Division would condition for contaminated land and would add an informative for the construction phase.

The Coal Authority

- Whilst the site falls within the coalfield, it is located outside the defined Development High Risk Area; meaning that there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability for the redevelopment of this site. Accordingly, there is no requirement to submit a Coal Mining Risk Assessment in support of any subsequent planning application for this site or for the LPA to consult the Coal Authority. Should planning permission be granted for this site, we would request that the LPA add our Standing Advice to the Decision Notice.

Housing

- The site is in the Greater North West Strategic Housing Policy Zone where the target is for a minimum of 15% of the total number of dwellings provided on site to be affordable homes. This proposal is for 25 residential units which equates to a minimum of 4 affordable housing units onsite. Affordable housing must be built to DQR standards, the highest need being for social rented tenure, 2 & 3 bedroom dwellings.
- There are 4 affordable houses indicated on the plan which is in line with LDP policy. The number and dwelling type/size proposed affordable housing is acceptable but the location is not, they should not be grouped in one location. Affordable housing should be integrated into

the overall development and should not be obviously segregated through location, layout or design. The affordable housing units should not be subject to service charges, they should be social rented tenure and must be transferred to the Council/RSL (to be determined). This site falls within the Loughor Ward, it is ACG band 2.

Education

- Confirmation that the catchment schools are Tre Uchaf Primary School, Y.G.G. Pontybrenin, Penyrheol Comprehensive and Y.G. Gwyr and there is surplus capacity in each of these schools.
- Confirmation that there is no request for a developer's contribution towards Education in respect of any of these schools.

Archaeology

- GGAT has consulted the regional Historic Environment Record (HER) and note the submission of a desk-based assessment (DBA) by RSK ADAS (dated August 2020). The Neath-Loughor Roman road (RR60d) is located to the north of the site and several Roman findspots are located in the vicinity, with the DBA indicating a low-moderate potential for Roman remains. Furthermore it suggests a low-moderate potential for Post-medieval remains.
- Additionally, an archaeological field evaluation was conducted on an adjacent site to the west in 2014. The evaluation recorded a deposit likely associated with Beili Glas Cottage, containing Post-medieval pottery, glass and mortar.
- As such, there is the potential for encountering archaeological remains during the course of the proposal, particularly those dating to the Roman or Post-medieval periods. Therefore, should a similar application to the one you have outlined be submitted, we would likely recommend a condition requiring an archaeological watching brief to be conducted during ground intrusion works be attached to any consent. The scope and methodology for the watching brief would be detailed in an agreed Written Scheme of Investigation (WSI).

Planning obligations

- A Section 106 Agreement is required to secure the Affordable Housing contribution and possible Highways contribution towards sustainable transport measures.

APPENDIX 2

Correspondence with RSL

From: Brown, Joanna <jo@coastalha.co.uk>

Sent: 16 November 2020 11:13

To: Browning, Faye <faye.browning@barratthomes.co.uk>

Subject: RE: *EXTERNAL: 2020/1690/PRE Land South Of Glebe Road, Chapel Fields (Phase 2), Loughor

Morning Faye

Just to confirm following our conversation, after forwarding the proposed plan for phase 2 at Chapel Fields Loughor, my colleagues in housing agree that having the social units located together would be the best option.

There are only a few units being purchased by Coastal in this phase as part of the S106 agreement therefore from a management perspective Coastal believe it is beneficial to locate them together.

I hope this helps clarify

Kind regards

Jo

Joanna Brown

Project Manager

Coastal Housing Group Ltd



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