

PLANNING STATEMENT

Gwynfaen 2: Residential Development

**Land off Brynafon Road, Penyrheol,
Swansea**

September 2024



Summary

Proposal:

Construction of 50 no. affordable homes and associated works

Location:

Land North of Brynafon Road, Penyrheol, Swansea

Date:

September 2024

Project Reference:

S21.291

Client:

Pobl Group

Product of:

Asbri Planning Limited
Suite D 1st Floor
220 High Street
Swansea
SA1 1NW

Prepared by:

Oliver Hanney

Approved by:

Phil Baxter

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Asbri Planning on behalf of the applicant, Pobl Group, in support of a full planning application to be submitted to the City and County of Swansea for the construction of 50 no. affordable dwellings, access, highways infrastructure, parking, landscaping, public open space, drainage and all associated works at Land off Brynafon Road, Penyrheol, Swansea.
- 1.2 As part of this application, the following application plans/drawings are submitted:

Drawing Name	Reference
Site Location Plan	edp7068_d005-D
Planning Layout	edp7068_d019-G
Boundary Treatments Plan	edp7068_d020
External Materials Plan	edp7068_d021-B
Street Elevations	edp7068_d023
House Type Pack	edp7068_d019-A
Landscape General Arrangement	edp7068_d022
Detailed Planting Plan	edp7068_d024-A
Existing Site Layout Plan	21883-HYD-XX-XX-DR-C-0200 P02
Existing Drainage Plan	21883-HYD-XX-XX-DR-C-0400 P01
Constraints Plan	21883-HYD-XX-XX-DR-C-0500 P05
General Arrangement Plan – Overall	21883-HYD-XX-XX-DR-C-1000 P02
General Arrangement Plan – Sheet 1	21883-HYD-XX-XX-DR-C-1001 P01
General Arrangement Plan – Sheet 2	21883-HYD-XX-XX-DR-C-1002 P01
General Arrangement Plan – Sheet 3	21883-HYD-XX-XX-DR-C-1003 P01
General Arrangement Plan – Sheet 4	21883-HYD-XX-XX-DR-C-1004 P01
Proposed Level Plan – Overall	21883-HYD-XX-XX-DR-C-1100 P01
Cut and Fill	21883-HYD-XX-XX-DR-C-1200 P01
Vehicle Tracking	21883-HYD-XX-XX-DR-C-1301 P02
Site Sections – Sheet 1	21883-HYD-XX-XX-DR-C-1601 P01

Site Sections – Sheet 2	21883-HYD-XX-XX-DR-C-1602 P01
Typical Sections – Sheet 1	21883-HYD-XX-XX-DR-C-2101 P01
Typical Sections – Sheet 2	21883-HYD-XX-XX-DR-C-2102 P02
Typical Sections – Sheet 3	21883-HYD-XX-XX-DR-C-2103 P01
Long Section – Sheet 1	21883-HYD-XX-XX-DR-C-2201 P01
Long Section – Sheet 2	21883-HYD-XX-XX-DR-C-2202 P01
Proposed Drainage - Overall	21883-HYD-XX-XX-DR-C-3000 P01

1.3 The following supporting documents are submitted alongside the Planning Application:

Document Name	Prepared By
Application Form	Asbri Planning
Planning Statement	Asbri Planning
Design & Access Statement	EDP
Pre-application Consultation Report	Asbri Planning
Agricultural Land Classification Analysis	Kernon Countryside Consultants Ltd
Archaeological Desk Based Assessment	Archaeology Wales
Preliminary Ecological Appraisal	Hawkeswood Ecology
Landscape and Visual Appraisal	EDP
Green Infrastructure Statement	EDP
Road Safety Audit Stage 1/2 Combined	J Bartlett Consulting Ltd
Stage 1/2 Road Safety Audit Decision Log	Hydrock
Site Investigation: Desk Study Report	Integral Geotechnique
Transport Statement	Hydrock
Tree Report	ArbTS
Drainage Report	Hydrock
Species Surveys	Hawkeswood Ecology

1.4 The statement assesses the requirement of local and national planning policy relevant to the application site and is structured as follows:

- Section 2: Site Description & Surrounding
- Section 3: Planning History
- Section 4: The Proposed Development

- Section 5: Planning Policy Context
- Section 6: Key Planning Considerations
- Section 7: Conclusion

2.0 Site Description & Surroundings

- 2.1 The application site is located to the west of Penyrheol and to the north west of Gorseinon. It is located some 8 miles north west of Swansea City Centre and 4.5 miles east of Llanelli Town Centre. Whilst Brynafon Road is located to the south of the site the proposal site would be accessed via the phase 1 site which is within Pobl ownership. The site lies to the east of Gwynfaen Farm buildings and comprises a 3.50 hectare, irregular shaped parcel of agricultural land bounded and naturally screened by hedgerows and trees and it slopes from east to west. The field is currently used for livestock grazing.
- 2.2 In respect of surroundings, the site is located within a predominantly residential area, its southern boundary abuts existing previously developed housing at Brynafon Road and Clos Brynafon and its eastern boundary abuts the aforementioned development under construction. The application site is also adjacent to the open countryside at the northern boundary and a woodland is located within close proximity to the site's southwestern boundary.
- 2.3 The site benefits from good connections to the local highway network with the A4240 running at approximately 700m south of the site from an east to west direction, providing links to and between Loughor and Swansea. A Public Right of Way is located at the site's northern boundary, providing linkage between the site towards Pontarddulais.
- 2.4 The Site is located a short distance from sustainable modes of public transport. The nearest bus stop is the Fernhill Road (eastbound and westbound) which is located on Gower View Road at about 300m east of the site, providing access to the First Bus service 16 route between Swansea and Pontarddulais at a 30-60 minutes frequency between Monday & Saturday, and a 120 minutes frequency on Sundays.
- 2.5 The Site is located a short distance from a range of services and facilities available in Penyrheol and Gorseinon. An existing footpath is available along Brynafon Road adjacent to the site's southern boundary which provide access to the Gorseinon Town Centre. The footpath provides a direct walking route to the Post Office; Shop and takeaway (all within circa 300m – 350m of the site).
- 2.6 The TAN 15 Development Advice Map indicates that the Site is located within Flood Zone A - Considered to be at little or no risk of fluvial or coastal/tidal flooding. In addition, the Flood Map for Planning indicates the vast majority of the site is located within Flood Zone 1 – Areas at risk of minimal risk of flooding, where new development should be directed to. An area of land within Flood Zone 3 (Sea and Rivers) is located to the south of the site (but not within the site

boundary). In regards to surface water, there is a narrow band of surface water and small watercourse Flood Zone 3 located along the site's boundary.

3.0 Planning History

- 3.1 Asbri Planning have undertaken a planning history search of the Swansea Council online planning register, which did not identify any historical planning applications associated with the subject site. As highlighted above, the application site adjoins the Gwynfaen Phase 1 development, which immediately adjoins the site to the east.
- 3.2 The adjacent site (Phase 1) was originally granted outline permission for residential development incorporating public open space and new access from Gower Road (ref: 2005/2355). The site was then subject to a Section 73 application for an extension of time to submit Reserved Matters pursuant to the aforementioned outline permission, this was approved on 8th October 2019 (ref: 2019/0911/S73). Subsequently, an application for reserved matters has been approved for the construction of 144 residential dwellings and associated works (ref: 2019/2144/RES) and 3 no. non-material amendments permissions for various changes to the layout. All necessary planning conditions have been discharged and the permission has been implemented, and is currently being built out.
- 3.3 It should also be noted that the application scheme is subject to a pre-application enquiry, which was submitted in January 2022. A full design evolution is available in the submitted Design and Access Statement.

4.0 The Proposed Development

4.1 The application proposes a residential development comprising 50 no. affordable dwellings, access, highways infrastructure, parking, landscaping, public open space, drainage and all associated works at Land off Brynafon Road, Penyrheol, Swansea.

4.2 The proposals place people at the heart of the development, with the masterplan ensuring the creation of a vibrant, characterful and fully accessible neighbourhood, which encourages social interaction and promotes a healthy life-style. The provision of green infrastructure will help to encourage active lifestyles and create a positive environment to the benefit of physical and mental-health and well-being.

House Type and No. of Units

4.3 The proposal will provide 50 no. affordable dwellings, encompassing a variety of house types which provides a broad mix to ensure a sustainable community. These are as follows:

- 18 x 1 Bedroom 2 Person Flat
- 2 x 2 Bedroom 3 Person Flat
- 2 x 1 Bedroom 2 Person Wheelchair Adapted Flats
- 4 x 2 Bedroom 4 Person House
- 2 x 3 Bedroom 5 Person House (Corner Turner)
- 4 x 3 Bedroom 5 Person House (Gable Front)
- 8 x 3 Bedroom 5 Person House
- 2 x 4 Bedroom 6 Person House
- 3 x 4 Bedroom 7 Person House
- 2 x 2 Bedroom 3 Person Bungalow
- 2 x 2 Bedroom 3 Person Wheelchair Adapted Bungalow
- 1 x 3 Bedroom 5 Person Bungalow

Design

4.4 The proposed scheme aims to address the five objectives of good design, which include: Access, Character, Environment Sustainability, Movement and Community Safety.

Access

4.5 It is proposed that vehicular access to the site will be taken from Phase 1 of the development, where a residential road will be extended to the site's southeastern boundary.

4.6 4 no. highways will be provided within the application site, which are as follows:

- Road 01 has an east-west direction of travel connected to Gwynfaen Phase 1 to the east and Road 02 to the west. The highway is 6.8m wide with 2m footways either side.
- Road 02 has a south-north direction of travel, terminating to the south and north. The carriageway is 6.8m wide with a 2m wide footway along its full length along the western side of the road, set back from the carriageway to accommodate highway rain gardens.
- Road 03 has an east-west into a north-south direction of travel, connected to road 02 to the east and terminating to the south via a turning head. The road is 5.5m wide with 2m footways other side.
- Road 04 has a south-north direction of travel, connected to Road 01 to the south and terminates to the north via a turning head. The northern turning head provides access to a private drive serving plots 9-18. The road is 5.5m wide with a 2m footway either side with an awareness strip and pedestrian crossing at the end of the bell mouth.

4.7 All highways are proposed to be lit with carriageways and footways constructed from asphaltic concrete to Swansea Highway Authority adoptable standards.

4.8 It should be noted that the master planning process has been strongly influenced by the ability of the proposed housing development to promote active travel linkages. Additional pedestrian footpaths are proposed to connect directly onto Brynafon Road and Gwynfaen Phase 1, which will allow for ease of access (on foot) to the nearby bus stops and local facilities (as described above). In addition, the proposed site layout aims to maximise pedestrian connections between the two phases of the development.

4.9 In terms of parking, it is proposed to provide a total of 78 car parking spaces on site. This is a proposed allocated of

- 1 no. parking space for each flat: a total of 22 car parking spaces; and
- 2 no. parking spaces allocated to each of the residential dwellings: a total of 56 car parking spaces
- Opportunities for visitor parking are also shown throughout the proposed layout.

4.10 Cycle parking for houses and bungalows will be within a secure and covered shed in the rear garden of each house whilst each flat block will provide the required level of parking within a communal store. Based on standards, 5 no. cycle parking stands or equivalent will be provided for the flats.

4.11 The site also benefits from existing well-lit footpath along Brynafon Road and Gwynfaen Phase 1 development, providing additional opportunities to reduce car reliance and engage in active travel methods.

Character

4.12 The character of the surrounding area is predominately residential. The existing residential area along Brynafon Road comprises of a mix of two-storey semi-detached / detached houses and bungalows, and the Gwynfaen Phase 1 development also echoes the above.

4.13 The character of the proposed development aims to echo the contemporary forms of Phase 1, but with a modified materials palette in keeping with the location to relate to Phase 1 but be unique from it. The following materials are proposed:

- Ebony Charred Larch or similar approved
- Weber White Renders or similar approved
- Brickwork Forterra Belgravia Gault Blend or similar approved
- Composite Slate Roof Tiles

Environmental Sustainability

4.14 The integration of green infrastructure within the proposed development layout forms a key feature of the design. The proposals aim to retain the existing tree planting, whilst creating new public green spaces. In addition, a SuDs-compliant drainage scheme forms a central feature of the site with the proposed surface water drainage scheme working in harmony with the enhancement of green infrastructure and provision of net benefit for biodiversity. Significant landscape planting is to be provided throughout the site. Moreover, the site's position on the edge of settlement and the proximity of surrounding green spaces and walking routes means future occupiers will have immediate access to high quality green space within the site itself and surrounding area.

4.15 It should also be noted that a pond feature is proposed at the south-western section of the site, which serves as a core feature of the sites SuDS strategy as an attenuation pond and provides landscaping and biodiversity enhancement benefits to the application site.

Movement

4.16 A fundamental component of good design is for the site to be accessible by several mode of transport. It has been demonstrated through this statement that the site is well located for both public transport and active travel methods giving access to other nearby settlements and the wider county.

4.17 The site is accessible via public transport by virtue of a bus stop, which is approximately 300m east of the site.

4.18 The application site is a short distance away from local facilities, including Post Office, shops and takeaway, which are all within circa 300m – 350m of the site.

Community Safety

4.19 It is proposed that the dwellings are set within the site with existing boundary hedgerows and trees separating the site and the existing residential area in Penyrheol. The properties and the parking spaces proposed will be within public view to encourage natural surveillance throughout the scheme

4.20 In regards to highway safety, the access/egress point will have adequate visibility from both directions, which will create a safe environment for both vehicles and pedestrians.

5.0 Planning Policy Context

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: "If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise".
- 5.2 The development plan that encompasses the application site is the Swansea Local Development Plan 2010 – 2025, adopted on 28th February 2019. Material considerations at a local level also include the relevant Supplementary Planning Guidance. Material considerations at a national level include Planning Policy Wales Edition 11 (February 2021), and the appropriate Technical Advice Notes (TANs).
- 5.3 Section 38(4) of the PCPA 2004 (as amended) states that: "For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area". Accordingly, the policies of relevance contained within the National Development Framework Future Wales: The National Plan 2040 and the adopted LDP are now discussed.

Future Wales: The National Plan 2040

- 5.4 Future Wales is the highest tier of development plan in Wales. It is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. Nevertheless, planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.
- 5.5 Policy 1 - Where Wales will grow: the Welsh Government supports sustainable growth in all parts of Wales. The subject site is situated within the Swansea Bay and Llanelli National Growth Area, where employment, housing opportunities and investment in infrastructure will be directed.
- 5.6 Policy 2 – Shaping Urban Growth and Regeneration – Strategic Place-making: indicates the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.

- 5.7 Policy 7- Delivering Affordable Homes: indicates the Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.
- 5.8 Policy 9 – Resilient Ecological Networks and Green Infrastructure: indicates in order ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.
- 5.9 Policy 28 – National Growth Area: Swansea Bay & Llanelli: Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. The National Growth Area should be recognised as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

Swansea Local Development Plan 2010-2025

- 5.10 The LDP Proposals Map indicates the subject site is situated outside the defined settlement boundary. The application site is not subject to a site-specific designation or allocation and therefore represents development in the countryside. Policies of relevance are discussed below.
- 5.11 **Policy H6: 100% Affordable Housing Exception Sites** – The policy allows for residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are for Affordable Housing for Local Needs. The proposed development must meet the following Criteria:
- I. The site represents a logical extension to the existing settlement and is of a scale appropriate to and in keeping with the character of the settlement;
 - II. The site is in a sustainable location having reasonable access to at least a basing range of services;
 - III. It is of a size, scale and design compatible with affordable dwelling standards and available to low- or moderate-income groups;
 - IV. There are binding agreements in place to ensure that the initial affordability benefits will be retained in perpetuity for all

successive occupiers who meet the Council's occupancy criteria;

- V. It is demonstrated that there are no satisfactory alternative arrangements to meet the need within the locality; and
- VI. There is no loss of land of important recreational, amenity or natural heritage value.

5.12 **Policy CV 2 Development in the Countryside** indicates outside defined settlement boundaries development will be required to ensure that the integrity of the countryside is conserved and enhanced. There is a presumption against development in the countryside, except where it is for:

- i. The purposes of agriculture, forestry or other rural enterprise;
- ii. The expansion of an existing rural business;
- iii. Affordable housing to meet local need at acceptable and sustainable locations within, or infilling, or adjoining settlements, or as minor extensions to small groups of dwellings in the countryside;
- iv. A rural exception site for employment in or adjoining a settlement;
- v. Development to allow a small business to operate from home;
- vi. One Planet Development;
- vii. Necessary infrastructure provision and enhancement of infrastructure networks; or
- viii. Recreational equine activities.

5.13 Countryside development must be of a sustainable form with prudent management of natural resources and respect for the cultural heritage of the area.

5.14 Wherever possible, existing buildings should be re-used or adapted and if this is not feasible new buildings should be located within or close to existing groups of buildings.

5.15 **Policy HC 3 Development in the Welsh Language Sensitive Area** indicates The Welsh language will be safeguarded and promoted throughout the County. Within the Welsh Language Sensitive Area the Council may subject the following developments on windfall sites to a Welsh Language Impact Assessment:

- i. Residential development for 10 or more dwellings; and
- ii. Retail, commercial or industrial development with a total floorspace of 1000 sq. m or more

5.16 In addition to the policies outlined above, the following policies are of relevance to the proposals.

Policy Reference	Relating to...
PS 1	Sustainable Places
PS 2	Placemaking and Place Management
PS 3	Sustainable Housing Strategy
IO 1	Supporting Infrastructure and Planning Obligations
H 2	Affordable Housing Strategy
SI 1	Health & Wellbeing
SI 3	Education Facilities
SI 6	Provision of New Open Space
SI 8	Community Safety
ER 1	Climate Change
ER 2	Strategic Green Infrastructure Network
ER 6	Designated Sites of Ecological Importance
ER 8	Habitats & Species
ER 9	Ecological Networks and Features of Importance for Biodiversity
ER 11	Trees, Hedgerows & Development
T 1	Transport Measures & Infrastructure
T 2	Active Travel
T 5	Design Principles For Transport Measures and Infrastructure
T 6	Parking
T 7	Public Rights of Way and Recreational Routes
EU 4	Public Utilities and New Development
RP 1	Safeguarding Public Health and Natural Resources
RP 4	Water Pollution and the Protection of Water Resources
RP 5	Avoidance of Flood Risk
RP 10	Sustainable Waste Management for New Development

Supplementary Planning Guidance

5.17 Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Swansea Local Development Plan (LDP). SPG do not have the same status as adopted development plan policies, however, they may form a material consideration in determining planning applications. The following SPG have been adopted:

- Placemaking Guidance for Residential Development (2021)
- Trees Hedgerows and Woodlands (2021)
- Development & Biodiversity (2021)

- Parking Standards (2012)
- Planning Obligations (2010)
- Planning for Community Safety (2012)

Planning Policy Wales Edition 12

- 5.18 In accordance with the Well-Being of Future Generations (Wales) Act 2015, 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”.
- 5.19 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.
- 5.20 PPW defines placemaking as follows: “Placemaking is 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”.
- 5.21 The importance of green infrastructure is summarised at Paragraph 6.2.4 states *“Green infrastructure 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 must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of the meeting society’s wider social and economic objectives and the needs of local communities”*
- 5.22 Paragraph 6.2.12 also states that *“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal”*.

Technical Advice Notes

5.23 In addition to the national policy guidance set out above, Technical Advice Notes (TANs) are land-use planning guidance documents issued by the Welsh Government to provide practical advice and guidance on areas of policy set out in Planning Policy Wales. TANs of relevance to the proposed development include:

- TAN 2: Planning & Affordable Housing
- TAN 5: Nature Conservation & Planning
- TAN 11: Noise
- TAN 12: Design
- TAN 15: Development & Floodrisk
- TAN 18: Transport
- TAN 20: Planning and the Welsh Language

6.0 Key Planning Considerations

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- Principle of Development
- Acceptability of Proposed Use
- Sustainability
- Design
- Highways, Access & Transport
- Ecology & Biodiversity
- Landscape
- Agricultural Land Classification
- Trees
- Coal Mining Legacy & Ground Condition
- Drainage
- Green Infrastructure and Landscape Planting
- Historical Asset
- Welsh Language Action Plan

Principle of Development

6.2 The application site is situated outside of the settlement boundary and therefore comprises development within the countryside, as defined by Policy CV 2 of the LDP. Policy CV 2 provides a criteria of exceptions where development in the countryside will be considered acceptable. This includes (inter alia):

“iii. Affordable housing to meet local need at acceptable and sustainable locations within, or infilling, or adjoining settlements, or as minor extensions to small groups of dwellings in the countryside;”

6.3 The application site occupies a highly sustainable location which adjoins the existing settlement boundary as set out within the adopted LDP. As highlighted above the development proposals comprise 100% affordable housing for local needs, to be provided by Pobl, a registered social housing provider. The proposals adhere to Policy CV 2 (iii), therefore establishing a basic principle for affordable housing development at the application site.

Acceptability of Proposed Use

6.4 The key policy in relation the acceptability of the proposed use is Policy H6 100% Affordable Housing Exception Sites. The policy allows for residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are Affordable Housing for Local Needs where the proposal meets certain criteria. The policy sets out criteria to ensure that affordable housing exception sites are of an appropriate nature and in a location, which is in accordance with the plan's strategy of creating sustainable communities. The proposal is considered to meet all criteria which is discussed below:

- i. The site represents a logical extension to the existing settlement and is of a scale appropriate to and in keeping with the character of the settlement*

6.5 The existing settlement of Penyrheol is located to the site's eastern boundary as such the site immediately adjoins the settlement boundary. The built form on this western side of the Penyrheol settlement is varied giving the settlement an organic appearance. There are also several small clusters of homes (on Gwynfe Road and Banfield Terrace) that extend beyond the settlement boundary giving a less distinct rural/urban separation.

6.6 EDP have undertaken a Landscape and Visual Appraisal in order to inform the development proposals. Having regard to the site's landscape character it is concluded that the site is considered to be of Medium sensitivity as the site is not covered by any local or national landscape designations and some of the more mature landscape features on the site are in a poor condition and in need of management.

6.7 To the south western boundary of the site lies an existing woodland which assists in providing a significant visual screen to the site such that it is not visually prominent from publicly accessible locations in the vicinity. Other tree lined boundaries to the site limit views to the site from other directions. The Design and Access Statement prepared by EDP helps to demonstrate the visual containment of the site, and having regard to the landscape features, built form to the west, south and east the site presents an opportunity to expand the settlement in a logical manner. The proposals respond in an appropriate manner.

6.8 The landscape and visual sensitivities of the site have influenced the proposed site layout. The scheme proposals incorporate a degree of integral mitigation designed to reduce potential landscape and visual effects.

- 6.9 The baseline study undertaken recognises the need for high quality, sustainable architecture with a multifunctional Green Infrastructure network. Furthermore, in order to reduce visual effects from the south-west where there are direct and framed views from the site; tree planting within the development is recommended and proposed as well as the physical breaking up the quantum of development (north-south). It is proposed that existing wooded field boundaries are retained and enhanced to maintain the soft edge and ensure a natural transition to the countryside beyond.
- 6.10 In order to respond positively to the site character, the proposal is of a low density, reflecting the site's rural fringe location. The built form has been pulled away from both the eastern and north-western boundaries so as to limit the built form to the established extent of the settlement. In addition, the proposed houses employ local traditions in their forms, materials and details, that help identify the site as a logical extension of the settlement in this location. Further perimeter planning and the inclusion of open spaces in the north and west of the site break up the built form and help soften views to the site.
- 6.11 The proposal comprises affordable dwellings with generous garden areas and much of the land is given to green infrastructure. The proposed development is considered to be appropriate in scale and in keeping with the character of Penyrheol and the immediate adjoining development under construction to the east and it can be firmly concluded that the proposals represent a logical extension of the settlement in this location.
- ii. *The site is in a sustainable location having reasonable access to at least a basic range of services*
- 6.12 The proposal site occupies a wholly sustainable location, benefiting from excellent access to a number of public services and facilities. The site is a short walking distance (15minutes) away from Penyrheol which is host to several essential local facilities, amenities and services which include Penyrheol Primary and Secondary Schools, Penyrheol Leisure Centre. In addition, it is a within a 5-minute walk of convenience stores and takeaways and food outlets near the Brynafon Road/ Frampton Road intersection. The application site is a short distance from Gorseinon District Centre which is host to further facilities, amenities and services including medical centres.
- 6.13 There are a number of playgrounds and parks nearby including that off Gower View Road to the east as well as at Parc Y Werin, Glanymor Park.

- 6.14 Public Rights of Way adjoin the southern and western boundary of the site providing links further afield and National Cycle Route 4 in Loughor provides an Active Travel Route to the east, giving access to Gowerton Train Station.
- 6.15 The site is well served by buses with stops on Brynafon Road and Gower View Road giving access to Gorseinon, Gowerton and Swansea City Centre.
- 6.16 It can be concluded that the application site occupies an inherently sustainable location with excellent access to a range of services and facilities.
- iii. *It is of a size, scale and design compatible with affordable dwelling standards and available to low- or moderate-income groups*
- 6.17 As a registered social landlord, the applicant has worked with the Council's Housing Officers to identify the local need in the locality and the proposals therefore present a range of 2-, 3- and 4-bedroom homes that responds to this need. The applicant is more than familiar with the standards required to meet affordable housing requirements and is committed to deliver a low carbon neighbourhood as a continuation of the adjacent development.
- 6.18 The adjoining Phase 1 development comprises a mix of tenures. In addition to social rented affordable homes, 88 no. units in Phase 1 are either open market sales units or low-cost home ownership tenure units, which in itself helps to create a balanced community of home ownership. On this basis, it is considered that the proposals will not cumulatively create an over concentration of 100% affordable social rented dwellings. The proposals will therefore not prejudice the creation of mixed communities, as the development will complement the mixture of tenures available in Phase 1.
- iv. *There are binding agreements in place to ensure that the initial affordability benefits will be retained in perpetuity for all successive occupiers who meet the Council's occupancy criteria;*
- 6.19 The proposal comprises 100% affordable housing and would be presented by Pobl Group who are an affordable housing provider and this is expected to be secured by a legally binding Section 106 Agreement.
- v. It is demonstrated that there are no satisfactory alternative arrangements to meet the need within the locality

6.20 Whilst there are allocations for residential development and housing within the locality and near to the site, all of have been previously developed or are being developed. The ability to deliver 100% affordable housing on suitable sites are few and far between, and the proposals provide an opportunity to deliver a large volume of affordable homes in an area of high need. There are no significant areas and no areas of significant brownfield land with opportunities for development.

vi. There is no loss of land of important recreational amenity or natural heritage value

6.21 The site has no recreational amenity and the Landscape and Visual Appraisal presented by EDP demonstrates that the development of the site can be assimilated in the landscape setting without adversely affecting its natural heritage value. The proposal retains the existing trees and hedgerows which help provide screening and there are opportunities through the development to strengthen the field boundaries and provide native planting to help soften the views from the countryside and ensure a gentle transition from the urban edge to rural setting.

6.22 Furthermore, an Agricultural Land Classification Analysis has been undertaken by Kernon Countryside Consultants Ltd who have confirmed that the site is shown on the Predictive ALC v2 as subgrade 3b. Subgrade 3b does not fall within the definition of BMV agricultural land therefore there is no BMV land within the site, and there should be no policy constraint to non-agricultural development of this lower quality land.

6.23 In summary, this section demonstrates how the proposed development fully accords with Policy H6 100% Affordable Housing Exception Sites, which sets out a permissance criteria for such developments. On this basis the acceptability of the proposed affordable residential use is robustly established.

Sustainability

6.24 There are several essential services and amenities within a 15minute walking distance from the centre of the site, providing opportunities for residents to meet their basic daily needs without the need to use a motor vehicle. Local shops, post office and takeaways are located on Brynafon Road/Frampton Road with more located within the centre of Gorseinon. Medical facilities include Gorseinon Hospital and doctors' surgeries within Gorseinon. As mentioned above, Penyrheol Primary and Comprehensive schools are located nearby as well as the newly constructed Parc Y Werin Primary School. Gorseinon Secondary School is located some 0.8 miles east. There are several playgrounds, parks

and leisure facilities near the site which include Penyrheol Leisure Centre, Glanymor Park and Parc-Y-Werin.

- 6.25 Public Rights of Way (PRoW) follow the western and southern boundary of the site and link to the wider PRoW network and the Wales Coast path in Loughor. The National Cycle Route 4 in Loughor is nearby and there is an Active Travel Route to the east that provides bicycle access to Gowerton Train Station.
- 6.26 The site is well served by buses with several stops within walking distance. Bus stops are located at Brynafon Road and Gower View Road which provide regular services to Gorseinon, Gowerton and Swansea City Centre. These routes also stop at Gowerton Train Station (located approximately 2 miles to the south east), providing alternative sustainable methods of transport.

Design

- 6.27 The character of the proposed development aims to echo the architectural style of the adjacent Gwynfaen Phase 1 development. A contemporary form and palette of materials is envisioned. The proposals include a range of house types, with one to four bedrooms affordable homes proposed. The proposed site layout represents very low density development, which is in keeping with the site's rural fringe location. The built form has been pulled away from the site edges in order to conform with the rural fringe setting.
- 6.28 The proposed development will include a range of energy efficient homes that cater to the needs of local residents. The contemporary design of these homes will complement the character of the dwellings of the adjoining Phase 1 development, whilst still creating its own sense of place and character, with a distinctive style.
- 6.29 It is envisaged the proposed development will offer flexible, lifetime homes that provide accessible and adaptable dwellings for the widest range of residents in order to meet local affordable housing needs. The design of the proposal in respect of siting and layout seeks to seamlessly integrate with the neighbouring communities in the locality, serving as an extension to the existing Phase 1 neighbourhood. The resulting neighbourhood will provide modern, low-carbon dwellings that operate in harmony with their surroundings.
- 6.30 It is therefore considered that the proposed development is in accordance with LDP Policies PS1 and PS2.

Highways, Access & Transport

- 6.31 Access to the application site is taken via site will be taken from Phase 1 of the development, where a residential road will be extended to the site's southeastern boundary, which is a two-way, single carriageway residential road. The road is subject to a speed limit of 20 mph. Pedestrian accessibility is of a very high standard at the site. The site benefits from existing pedestrian infrastructure along Brynafon Road and the Gwynfaen Phase 1 development
- 6.32 Policy T5 (Design Principles for Transport Measures and Infrastructure) outlines that all proposals must ensure that the design of development together with any supporting transport measures maximises the accessibility of the site via public transport and Active Travel and provision of suitable facilities creating a safe attractive environment for pedestrians, cyclists and other non-motorised modes of transports.
- 6.33 The application site is considered to be located in a sustainable location with a bus stop in close proximity to the site. The site is also within reasonable cycling distance of the Gowerton railway station, providing a quick link to Swansea which is beneficial for both commuting and leisure purposes. Cycle links and a series of footways and PROWs are also located in the vicinity of the site and connect to a number of neighbouring residential areas.
- 6.34 As aforementioned, 4 no. residential roads are proposed within the application site with adequate visibility splays of 2.4m x 25m at where the roads proposed intercept to ensure highway security for pedestrian and cyclists. The roads have also been designed to accommodate a range of vehicles, including a 11.2m refuse collection vehicle to facilitate the service demand upon completion of the proposed development.
- 6.35 A Transport Statement prepared by Hydrock is submitted to support this application. It is considered that there will be an increase in trips generated as a result of the development proposals, owing to the existing undeveloped nature of the site. Despite this, this increase is limited to just 24 two-way trips in the AM peak, and 23 two-way trips during the PM peak. It is therefore considered that the development will not have a 'severe' impact upon local highway network.
- 6.36 The Transport Statement concludes that the proposed development is unlikely to have a material detrimental impact upon the operation and functioning of the local highway network.
- 6.37 In terms of parking, it is proposed to provide a total of 78 car parking spaces on site. It is considered that the proposed parking provision is sufficient to accommodate the likely parking demand generated by the proposed development, based on the type of development (100%

affordable dwellings) and the edge of town location. Based on the 2021 census date, the proposed development could generate a total parking demand of 46 vehicles. It is considered that the proposed car parking provision is sufficient to accommodate the likely demand. In addition, sufficient car parking spaces will be provided to encourage active travel methods.

- 6.38 It should also be noted that in terms of Swansea on the whole based on the 2021 Census, 48.4% of socially rented tenures having no access to a car, 40.1% having access to one car, and 11.5% having access to two or more cars. These car ownership are significantly lower than in owned tenures within the county, at which in comparison, only 11% have no access to a car, 42% have access to one car, and 45% have access to 2 or more cars.
- 6.39 The Census data suggested that majority of the residents will not have access to two or more cars, therefore requiring significantly less parking provision than the maximum standard set out in the SPG.
- 6.40 It is considered that the level of car parking proposed together with the suite of measures suggested in terms of restricting the level of car ownership of tenants through the type of tenure, car parking management and implementations of a detailed travel plan to encourage residents and visitors to utilise other mode of travel other than the car and cycle parking provision firmly align with the overarching national planning policies set out in both Future Wales (FW) and Planning Policy Wales (PPW)

FW Policy 12 states that "...Planning authorities must act to reduce levels of car parking in urban areas, including supporting car free developments in accessible locations and development with car parking spaces that allow them to be converted to other uses over time..."

PPW also seeks to deal specifically with car parking and states at paragraph 4.1.49 and 4.1.50 that "Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in a quality of a place."

"A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.

The needs of disabled people must be recognised and adequate parking provided for them."

- 6.41 The above provides an up-to-date national policy position which supports the intention to provide an under provision of parking, with the applicant proactively seeking to improve of access to cycle and walking routes and specific proactive measures to reduce car ownership within the tenant group.
- 6.42 A Stage 1 / 2 Combined Road Safety Audit (RSA) is also carried out by J Bartlett Consulting Ltd and it identified that there was a lack of crossing point have been identified across the network to be constructed. In addition, there is also a concern raised on on-street parking, which can lead to damage to grassed verges and other highway infrastructure. It will also impact negatively on junction visibility within the site and pedestrian connectivity. The Designers response to the RSA is as follows:
- Pedestrian crossing points have been added across the site as shown on the site layout.
 - The design has been developed to remove the necessity for illegal parking on footways. Road 02 has road side rain gardens minimising potential areas for illegal parking. Vehicular movement of refuse vehicles have been demonstrated to pass a parked car.
- 6.43 In light of the above, it is considered the proposed development is in accordance with Policy T5 (Design Principles for Transport Measures and Infrastructure) and that the current proposal is served by appropriate parking provision in accordance with T6 (Parking) of the LDP.

Ecology & Biodiversity

- 6.44 A Preliminary Ecological Appraisal (PEA) prepared by Hawkeswood Ecology has been submitted to support the application. It is considered that the site is dominated by poor semi-improved grassland which is best described as 'improved with rushes', a habitat typical of formerly reseeded and poorly managed agricultural modified grassland, and redundant derelict hedgerows; the hedgerows are a priority species under Section 7 of the Environment (Wales) Act 2016. The site does not meet the requirements to be notified as a Site of Importance for Nature Conservation.
- 6.45 The application site lies within 110m of the Carmarthenshire Bay and Estuaries Special Area of Conservation (SAC). Currently a number of drainage systems appear to cross the field emptying into the stream at the immediate north of the site.

- 6.46 In addition, approx. 2km to the south west of the application site is Burry Inlet Special Protection Area (SPA). The SPA is cited for the large number of waterbirds regularly wintering across the area. The Burry Inlet and Loughor Site of Special Scientific Interest (SSSI)'s boundaries lie approx. 110m from the site. Whilst this area of the SSSI lies outside the SPA, there is clearly interaction with birds being driven upstream by tides. A Habitat Regulations Assessment (HRA) will be required to assess the possible harm to the aforementioned designated sites and the potential for pollution incidents during construction will be addressed by a Construction Environmental Management Plan through an appropriately worded condition.
- 6.47 In terms of protected species, bats and breeding birds are likely to utilise the site for foraging. The linear boundary features present would also be of importance to commuting bats. The presence of reptile is likely and the habitats on site present opportunities for common lizard, slow word and grass snake in particular. There is also a likely presence of common amphibians. However, the presence of great crested newt is not considered likely.
- 6.48 In light of the above, further surveys were recommended for the following:
- Walk over habitat survey
 - Bat activity
 - A bat tree roost assessment of any trees affected by any proposed development
 - Reptile presence/absence survey
 - Pre-commencement search for use of stream and wider site by otter and badger
 - Hedgerows Regulations Assessment if the hedgerows at the southern boundary are removed.
- 6.49 It is also recommended that any works on hedgerows and woodlands should be undertaken outside the bird breeding season and the relevant hedgerows areas must first to be searched for evidence of dormouse use by a licensed dormouse ecologist. In addition, any landscaping plan should introduce native species reflecting those present in the local area.
- 6.50 The PEA also suggested a number of ecological enhancement features, including the follows:
- Hedgehog passages
 - Sensitive Lighting Strategy
 - Integral bat and bird boxes
 - Retention of hedgerows

- Creation wetland habitats, particularly marshy grassland in the attenuation pond area.

- 6.51 The Phase 2 Species Surveys have also been prepared by Hawkeswood Ecology to support the application. The survey shows that up to seven species of bat using or overflying the site with activity largely concentrated on the northern and southern boundaries. With surveys currently ongoing, an addendum report regarding the completed bat surveys will be produced.
- 6.52 A small population of slow worms has been identified with only two areas of the site seen to support them on more than one visit. Recommendations are made to safely remove slow worms from Site using habitat manipulation.
- 6.53 The site supports a species poor recovering habitat best described as species poor semi-improved grassland which is reverting to a poor marshy grassland type. Recommendations are made to enhance the retained habitat or newly created habitat favouring species of marshy grassland to provide areas of species rich marshy grassland in the final development.
- 6.54 In light of the above, it is noted that there are no major constraints to the proposed development foreseen if the recommendations listed above are implemented.
- 6.55 It is considered that the potential impact to the biodiversity can be mitigated given that the aforementioned recommendations and enhancement measures are implemented. In this regard, it is therefore contended that the proposal meets the requirements of Policy ER8 (Habitats and Species) and ER9 (Ecological Networks and Features), and PS1 (Sustainable Places) of the LDP.

Landscape

- 6.56 The Site is located within close proximity to the Special Landscape Area (Lower Loughor Valley and Estuary and Southern part of Burry Inlet), as designated under Policy ER5 of the current/adopted LDP. The supporting text to Policy ER5 specifies at Paragraph 2.9.30 that "The policy is not intended to unduly restrict acceptable development in the countryside but to ensure that such development is compatible with the surrounding landscape".
- 6.57 The proposed site layout aims to respect the landscape context, ensuring the retention of existing landscape features across the site, and incorporating enhanced landscaping (by means of a detailed landscaping scheme). Regarding the Special Landscape Area (SLA), it is

considered that the proposed development will have no direct effect to the SLA given that the SLA is separated from the site by the Gwynfaen Farm complex with no tangible, perceived connection with the SLA.

6.58 A Landscape and Visual Appraisal has been prepared by EDP in support of the proposed development in order to identify the current quality and character of the site landscape and record a range of representative viewpoints from within its zone of visual influence.

6.59 The LVA considers the effects arise from the proposed development are likely:

- The character of the site itself is deemed **medium** sensitivity and will be subject to a large degree of change. It's greenfield character and use as grazing/pastureland will alter to accommodate new affordable house. This is not an indication of bed design. Instead, it is the inevitable result of introducing housing into what is currently a green field site;
- The character of the site's immediate context and surroundings will undergo very little change post development. The site forms an extension to the residential development present within its surroundings (adjacent both to the east and south);
- In visual amenity terms, users of the public rights of way abutting the site boundary will experience a major change post development. This will reduce over time, as infill and reinforcement planting mature, and thus screens more of the site from these routes;
- Routes further west, namely the other side of the Loughor Estuary, although of high sensitivity, will experience little change due to the intervening distance. The development represents an extension to the urban edge, and does not extend above the existing ridgeline of Penyrheol; and
- There will be no considerable effects, in visual amenity terms, on nearby roads users or residential receptors, given the abundant housing development surrounding the site's boundaries, and limited intervisibility with the parcel itself. Rail users to the west of the estuary will also experience very little change following development.

6.60 It is considered that the scheme brings about many positives in landscape terms to the character and use of the site. Although the character will largely change, new features such as reinforcement planting, attenuation basins, interactive rain gardens, community growing areas as well as formal natural play spaces which help to

neutralise this changes. New planting will create habitats for wildlife and build upon those already in place within areas of open space.

- 6.61 The LVA considered that the development can be accommodated within the application site and would not constitute an unacceptable impact in landscape and visual terms.

Agricultural Land Classification

- 6.62 An Agricultural Land Classification Analysis Report has been prepared by Kernon Countryside Consultants Ltd (October, 2021) in support of the submission. The Welsh Government Predictive Agricultural Land Classification Map indicate that land within the site is classified as Grade 3b agricultural land, which does not fall within the definition of BMV agricultural land in PPW11 and is considered as low quality. Therefore, there should be no policy constraint to non-agricultural development of this lower quality land.

Trees / Hedgerows

- 6.63 A Tree Constraints Plan has been prepared by ArbTS in support of the proposed development. The TCP identifies the existing individual trees alongside groupings of trees and hedgerows located on site, primarily focussed on the site boundaries. Two groupings of Category B (moderate value) trees (desirable for retention) are situated at the site's northern boundary, alongside three groupings of Category C (low value) trees (optional for retention). Three category U (poor value) trees are located in the north of the site (unsuitable for retention). Two category A trees (High value) are situated at the site's western boundary (highly desirable for retention), whilst another Category A is situated at the site's southern boundary. A single Category U tree is located at the site's southern boundary. The eastern, southern and western site boundaries can be characterised as a mixture of category C and B groupings.
- 6.64 In summary, the TCP highlights the presence of existing trees at the site perimeter. The green infrastructure-based approach towards the proposed development will seek to maximise and retain existing trees, to the benefit of ecology & biodiversity. Furthermore, the retained trees will play a key role in landscape screening, ensuring the proposals are suitably embedded within the existing landscape. Additionally, the retention of existing trees forms a crucial aspect of the commitment towards maintaining and enhancing a Green Infrastructure network at the application site.

Coal Mining Legacy & Ground Condition

- 6.65 The Coal Authority online mapping indicates the application site is located within the Coal Mining Reporting Area. The online mapping appears to indicate a section of the application site is located within the Development High Risk Area. In this regard, a Desk Study Report produced by Integral Geotechnique is submitted to support the application.
- 6.66 The Coal Authority state that there are recorded works beneath the site within one seam of coal at 385m depth. It is considered that the shallowest recorded works at 385m would be at a depth that would not pose a subsidence risk at the surface.
- 6.67 The Coal Authority state that probable unrecorded works is "none" and there are no recorded shallow roadways and there is none mine entries that are recorded within the site boundary. There are also no faults, fissures or breaklines are known to affect the development site.
- 6.68 However, the Desk Study Report also stated that the presence of unrecorded works and mine entries should not be ruled out. It is therefore recommended that intrusive works to be carried out to determine the level of risk to the development and to define the risk based on site specific data, which will be provided during the full application stage.
- 6.69 In addition, the Desk Study Report also suggested a site investigation proposal to inform including the foundation and floor slab design, soil infiltration potential and groundwater control. The site investigation works will be carried out and submitted to the LPA during the full application stage.

Drainage

- 6.70 A Drainage Strategy has been prepared by Hydrock in support of the proposals. In respect of foul drainage, the report finds the most sustainable method for the disposal of foul water discharge from the proposed development site is via the existing main sewer network. The new development will seek to discharge foul flows from the site to the public foul sewer system located within the northern area of the site. As the site falls east to west, a pumping station will be required to ensure the proposed foul from the western lower area can discharge to the public sewer.
- 6.71 In addition, it should also be noted that there is an existing 150mm foul sewer crossing the site which is located near the eastern boundary and flows south to north conveying foul flows from the Brynafon Road development, this existing sewer has a spur off which also serves the phase 1 development to the east of the site. Subject to agreement with

DCWW, it is proposed that the asset solely serving the Brynafon Road development is removed and the flows diverted into the proposed development foul water drainage gravity system.

- 6.72 In respect of surface water drainage, from 7th January 2019, all new developments of more than 1 dwelling house or where construction area is 100 sqm or more to submit a Sustainable Drainage Systems (SuDS) application demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments.
- 6.73 The report indicates the aim of the surface water drainage strategy is to mimic the natural catchment processes as closely as possible. It is proposed to discharge surface water runoff from the development to the watercourse near the northwestern corner of the site. Infiltration is not envisaged to be a suitable means of discharge from the site based on the testing undertaken for the site. However this will need to be further confirmed by infiltration testing which will be carried out as part of the geotechnical site investigation.
- 6.74 Surface water runoff is to be attenuated from site to 33 l/s via a hydrobrake flow control on the gravity connection from the attenuation basin, this run-off rate will then be maintained for all rainfall events up to and including a 100YRP with 40% allowance for climate change and urban creep.
- 6.75 Given the proposed site layout storage could be provided in the form of rain gardens, the feature swale and basin. The main storage feature for the site will be the attenuation basin which will be located at the low point of the site to the west, with rain gardens on each plot providing further storage upstream of the main feature.
- 6.76 In light of the above, the drainage design will be compliant with national statutory SuDS standards and the SAB process will be adhered to in support of the proposal. It is considered that the proposal accords with Policy RP4 (Water Pollution and the Protection of Water Resources) of the LDP.

Green Infrastructure, Open Space and Landscape Planting

- 6.77 As highlighted above, existing trees and hedgerows at the site perimeter are to be retained and enhanced through sympathetic planting to create a sense of enclosure and minimising visual impact. The retention of such features will benefit existing wildlife corridors. Additional planting throughout the scheme, particularly along the eastern boundary and open spaces at the northern and southern ends of the development will break up the built form of the proposals, softening views of

the site. Existing wooded field boundaries are to be retained and enhanced, with vegetation clearing to be minimised in order to maintain the wooded appearance of the settlement edge. The proposals keenly demonstrate a green infrastructure focussed approach towards design.

- 6.78 In respect of open space, a community garden & allotments, play areas and community orchard are proposed, which provide space for gatherings and exercise, whilst taking advantage of views to the Loughor Estuary. The community gardens and orchard will be dedicated to growing fresh produce and plants, encouraging community stewardship and healthy lifestyles. The SuDS attenuation basin situated in the west of the site will act as informal open space, with footpath routes around the attenuation pond.
- 6.79 Native species planting, including new planting of woodland, trees shrub and scrub, is proposed across the site as shown on the submitted Landscaping General Arrangement Plan to create natural woodland edges, shrubby glades and dense and well-connected hedgerows considered favourable to wildlife. The proposed landscaping strategy is considered to have enhanced the biodiversity of the application site.
- 6.80 A Green Infrastructure Statement is prepared by EDP to support the application. It is considered the trees and hedgerows retention, enhancement and creation measures as demonstrated above will ensure extent, diversity and connectivity of those most valued habitat features on site are maintained whilst continuing to provide suitable habitat for a range of protected and notable species. More broadly, such measures will also ensure the protection and continued delivery ecosystem service benefits on site.
- 6.81 It is concluded in the Green Infrastructure Statement that the measures above are considered to effectively mitigate the scheme and will bring a host of public and wildlife benefits to the site and its future users. It is therefore contended that the proposal meets the requirement of Policy ER8 (Habitats and Species) and ER9 (Ecological Networks and Features), PS1 (Sustainable Places), Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales and Chapter 6 of the Planning Policy Wales Edition 12.

Historical Asset

- 6.82 An Archaeological Desk Based Assessment produced by Archaeology Wales has been submitted to support the application. The report confirms that there are no designated historic asset (i.e. World Heritage Site, scheduled monument, listed building, registered park and garden, historic landscape or conservation area) lies within, or intersects with,

the application site. As such, there are no in-principle statutory constraints to its development.

- 6.83 The baseline of the 1km study area has identified possible activity from the Bronze Age period onwards, of which Roman, and Post-medieval/Modern archaeology are the most prominent elements. The possibility that similar archaeology exists within the Site cannot be ruled out. However, recent development proposals in the locality have not generally been required to provide field-based evaluation data to support the planning application. Instead, they have been approved subject to archaeological conditions, which have mainly comprised a watching brief during groundworks. This would appear to offer a viable framework for the proposals.
- 6.84 It is therefore considered that with appropriate archaeological measures in place, the proposed development will be in accordance with the LDP Policy HC1 (Historic and Cultural Environment) & HC2 (Preservation or Enhancement of Buildings and Features).

Welsh Language Action Plan

Policy Context

- 6.85 As highlighted above the application site is situated within the Welsh Language Sensitive Area under Policy HC 3 of the adopted LDP. Policy HC 3 indicates the Welsh language will be safeguarded and promoted throughout the County. It is stated that developments of 10 or more dwellings will be required to submit a Welsh Language Action Plan which sets out measures to be taken to protect, promote and enhance the Welsh Language.
- 6.86 The supporting policy text states that *'wards located within the Language Sensitive Area are defined on the Constraints Map and comprise: Clydach, Gorseinon, Gowerton, Kingsbridge, Llangyfelach, Lower Loughor, Mawr, Penllergaer, Pontarddulais, **Penyrheol**, Pontarddulais and Upper Loughor. The wards are located in close proximity to each other mostly within the Greater North West part of the County and collectively hold the highest percentage of individuals with Welsh language skills. The Plan seeks to protect the integrity of the Welsh language within the identified area, where an average of over 18% of the population speak Welsh.'*
- 6.87 The above reflects paragraph 2.7.2 of TAN 20: The Welsh Language (2016) which states that the Local Planning Authority may outline a need for measures to mitigate the impacts of development on the Welsh Language

6.88 TAN 20 supplements the policies set out in PPW11, providing guidance on how the planning system should consider the implications of the Welsh language in terms of development management. Paragraph 3.1.2 notes that 'considerations relating to the use of the Welsh language may be taken into account so far as they are material.'

Ward & Community Profile

6.89 The application site lies within the ward of Gorseinon and Penyrheol. The Ward lies approximately 11km northwest of the City Centre, consisting of the Penyrheol, Grovesend Gorseinon and Waungron communities.

6.90 The 2021 Census shows that of the overall population of 10,638, 96.1% of the population were born in the United Kingdom and 3.9% were born outside of the UK, compared to the Swansea average of 90.6 born in the UK.

6.91 In terms of demographics, at the time of the 2021 Census, of the population aged 3 years old and above (10,294), 1,395 people are able to speak Welsh. This equates to 13.5% of the ward population (ages 3+) compared to the Swansea average of 11.2%.

6.92 Other key finding of the 2021 Census data for the ward are as follows:

- 14th lowest ward population in Swansea, and 7th lowest population density (2021).
- Slightly higher percentage aged under 16 but lower proportion of people aged 16-24.
- Higher proportions of people born in the UK and able to speak Welsh.
- Household composition categories generally close to Swansea averages.
- Higher proportion of semi-detached housing and owned with a mortgage/loan tenure.
- Higher percentage of adults economically active and employees.

6.93 As a result of the fact that the ward within which the site is located has a greater proportion of individuals with an understanding of Welsh than at a County level, it is evident that the Welsh language forms an important role and feature of this community. Any proposed development within this community must seek to protect and promote the Welsh Language, as well as mitigate any negative impacts such a development may introduce.

	Gorseinon & Penyrheol Ward		Swansea Local Authority Area		Wales	
Total: All usual residents aged 3 years and over	10,294	100%	231,892	100%	3,018,172	100%
Welsh language skills: Can understand spoken Welsh only	670	6.5%	11,345	4.9%	156,762	5.2
Can speak, read and write Welsh	1,007	9.8%	19,951	8.6%	429,313	14.2
Can speak but cannot read or write Welsh	243	2.4%	3716	1.6%	68,391	2.3%
Can speak and read but cannot write Welsh	138	1.3%	2,008	0.9%	33,971	1.1%
Can read but cannot speak or write Welsh	166	1.6%	3,556	1.5%	41,567	1.4%
Can write but cannot speak or read Welsh	17	0.2%	317	0.1%	4,970	0.2%
Can read and write but cannot speak Welsh	46	0.4%	1,288	0.6%	17,580	0.6%
Can speak and other combinations of skills in Welsh	7	0.1%	311	0.1%	6,621	0.2%
No skills in Welsh	8,000	77.7%	189,400	81.7%	2,259,017	74.8%

Summary of data set TS032 Welsh Language in Wales: Welsh Language Skills (detailed)

6.94 The ward within which the site lies has a higher percentage figure for each of the data groups. This would indicate that the Welsh language plays a larger role in this ward than for the City and County as a whole.

Impact of the Proposed Development

6.95 This development will provide much needed affordable housing for single people and families in an area where local people on lower incomes are priced out of the market. The site falls within the Greater

North West Strategic Housing Policy Zone where there is a high need for affordable housing,

- 6.96 As highlighted above, the proposals will provide 100% affordable housing to address a distinct and identifiable local need for affordable housing provision. On this basis, future residents will be local people who live in the existing community and are on the local authority housing register. It is therefore anticipated the proposals will serve Welsh speakers within the Swansea Local Authority Area who will make up a percentage of those people on the local authority housing register.
- 6.97 The availability of affordable housing will enable existing Welsh speaking residents in Penyrheol and the wider community to remain in the area, allowing community and cultural ties to be maintained to the benefit of the Welsh language and indeed Welsh speakers.
- 6.98 It can be concluded therefore that a high proportion of future occupiers will likely be drawn from the local area with a corresponding percentage of Welsh speakers which reflects that of the Penyrheol Ward and those adjacent (Upper Loughor Ward to the south, for example has a higher proportion of Welsh speakers – 16.8% in the 2011 Census).
- 6.99 When considering the impact of a new residential development on the Welsh language, there is a danger to focus as above, on the increase in population and the proportion of that population that hold Welsh language skills. However, immigration of non-Welsh speaking households into an area with a high proportion of Welsh-speaking households is only one threat to the future of the Welsh language. The 'other side of the coin' is the need to retain existing Welsh speaking households within communities with high percentages of people with Welsh language skills.

Mitigation Measures

- 6.100 In conclusion, the proposed development of 50 dwellings at Gwynfaen 2 is likely to have an overall positive impact on the Welsh language and its future in the Ward of Penyrheol & Gorseinon. Whilst there are no negative impacts identified, there may be a need to consider some mitigation measures as follows:
- The bilingual marketing of properties
 - The production of a welcome pack for each household which sets out Welsh language provision in the area
 - Ensuring street names are in Welsh in order to protect and promote the local linguistic character and cultural distinctiveness of the area

7.0 Conclusion

7.1 This planning statement has provided the policy justification in support of a full planning application to be submitted to the City and County of Swansea for the proposed residential development of 50 no. affordable dwellings, access, highways infrastructure, parking, landscaping, public open space, drainage and all associated works at Land off Brynafon Road, Penyrheol, Swansea.

7.2 In summary, this Planning Statement makes the following pertinent points:

- The application site is situated outside of the settlement boundary and therefore comprises development within the countryside, as defined by Policy CV 2 of the LDP. The development proposals comprise 100% affordable housing for local needs, to be provided by Pobl, a registered social housing provider. The proposals adhere to Policy CV 2 (iii), therefore establishing a basic principle for affordable housing development at the application site.
- The key policy in relation to the acceptability of the proposed use is Policy H6 100% Affordable Housing Exception Sites. The policy allows for residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are Affordable Housing for Local Needs where the proposal meets certain criteria. This Statement demonstrates how the proposed development fully accords with Policy H6 100% Affordable Housing Exception Sites, which sets out a permissibility criteria for such developments. On this basis the acceptability of the proposed affordable residential use is robustly established.
- The proposed development can be considered highly sustainable, in accordance with both local and national level planning policy.
- In addition to the key points addressed above, the scheme demonstrates compliance with all other material considerations including; highways & access, transport, parking, design, green infrastructure, open space & landscape planting, trees & hedgerows, drainage, loss of best and most versatile agricultural land, ecology & biodiversity, coal mining legacy, landscape impact and cultural heritage.

7.3 To conclude, it is considered that the proposals represent a policy compliant scheme when considered against the relevant local and national

level planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted accordingly.