

WALTERS

FORMER TATA SITE, PONTARDDULAIS
PLANNING STATEMENT
OCTOBER 2023

TABLE OF CONTENTS

- 1. Introduction**
- 2. Site, Surroundings and Planning History**
- 3. Proposed Development**
- 4. Key Planning Considerations**
- 5. Conclusions**

1. INTRODUCTION

This Planning Statement ('statement') has been prepared to support Walters Land Limited's ('Walters') outline planning application for the redevelopment of the former Tata site in Pontarddulais ('the site').

The vacant previously developed site presents a regeneration opportunity in an area of growth for Swansea Council ('the Council'). A plan identifying the location and extent of the site is included with this application and in the Design and Access Statement (DAS).

The proposals contained within the application have evolved as a result of consultation and dialogue with the Council. The application is seeking outline planning permission for a residential development scheme which will deliver a number of new homes in the area. At this stage, all matters, aside from the main access, are reserved for subsequent approval. If approved, Walters' proposals will transform the site and deliver:

- Up to 150 new homes;
- A green grid of new and improved open space; and
- Improvement of an existing access and a network of internal roads and paths.

Through its team of consultants, Walters has undertaken a comprehensive assessment of the site and the application proposals. This statement considers the main planning issues related to the application proposals and supports a number of other statements and assessments that have been prepared to demonstrate the site's potential and acceptability. These include:

- A Design and Access Statement ('DAS') prepared by Hammond Architectural Ltd.
- A Flood Consequences Assessment ('FCA') prepared by JBA Consulting
- A Transport Assessment ('TA') prepared by Apex Transport Planning Ltd.
- A Site Investigation Report ('SI') prepared by Integral Geotechnique
- A Drainage Strategy ('DS') prepared by Phoenix Design Partnership Ltd.
- Preliminary Ecological Appraisal ('PEA') prepared by Sylvan Ecology
- Tree Survey ('TS') prepared by Sylvan Ecology
- Noise and Vibration Assessment ('NVA') prepared by Hunter Acoustics
- Heritage Assessment ('HA') prepared by EDP

These documents are based on a masterplan prepared by Hammond Architectural Ltd. This plan, which explains the development concept for the site, is included with this application and is also included in the DAS. A full explanation of the masterplan and the rationale behind it is also included in the DAS.

This statement is structured as follows:

- **Section 2** provides a description of the site and surrounding area and provides a commentary on its recent planning history;
- **Section 3** outlines the relevant planning policy framework, working from a local level to national;
- **Section 4** provides details of the proposed development, including feedback received from pre-application discussions with the Council;
- **Section 5** summarises the key planning merits and issues that will guide the consideration of the application; and
- **Section 6** provides a short conclusion and recommendation.

2. SITE, SURROUNDINGS AND PLANNING HISTORY

Introduction	<p>The application site comprises 12.67 acres of land allocated in Swansea Council’s Local Development Plan (LDP) as one of the 12 Strategic Development Areas (SDAs) identified under Policy SD 1.</p> <p>Strategic Development Areas are allocated to provide new homes and opportunities for job creation and commercial investment at a strategic scale. This specific Strategic Development Area is referenced as Policy SD A: South of Glanffrwd Road, Pontarddulais in the LDP. SD A allocation is split over two sites and is proposed to deliver a total of 720 new homes together with a primary school, leisure and recreation facilities, public open space and appropriate community facilities, employment and commercial uses.</p>
Existing site and surroundings	<p>The town of Pontarddulais is located some 12km north west of Swansea and 9km north east of Llanelli. The town is situated to the north east of Junction 48 of the M4, and also benefits from a railway station and regular bus services with direct links to Swansea and further afield. The site benefits from excellent access to major employment areas in south and west Wales as well as those nearby in and around Pontarddulais – in the nearby industrial estates and Pontarddulais Town Centre, which is a designated District Shopping Centre in the LDP.</p> <p>As set out in the introduction to this statement, the site represents a brownfield regeneration opportunity.</p> <p>The site is level and totals approximately 12.67 acres (5.13 hectares) – all of which is located within Pontarddulais’ settlement limits. It currently includes a self-contained and fenced industrial/factory building of steel frame construction, lower height warehouse/production area, internal storage and office. There is also an adjoining two storey office building, along with some single height ‘lean-to’ storage. In total, the buildings on site comprise approximately 96,400 sq ft with site coverage of approximately 30%. The buildings on the site are run down and have not been in use for a number of years and we are aware that there is asbestos in the older buildings on site. The intention would be to remove all buildings in an acceptable and safe manner.</p> <p>An industrial estate is immediately to the north of the site - the estate comprises mainly local independent occupiers including DG Heath Timber Products, Trade Services Direct, A&P Electrical Supplies and Tate Refrigeration Ltd. To the east and south east are a number of residential properties. To the west is a railway line.</p> <p>JBA Consulting has been commissioned to provide expert flood risk advice.</p> <p>JBA are authors of the NRW flood modelling of the area and bring with them considerable knowledge of the complex flood hydraulic through Pontarddulais. Approximately half of the site is located in Flood Zones 2 and 3 the Flood Map for Planning. This is attributed to fluvial flooding of the River Loughor. The area is further designated as a Defended Zone. Consequently, all forms of development can be justified at the site provided that the acceptability criteria of TAN15 is satisfied.</p>
Site accessibility	<p>The Transport Assessment (TA) prepared by Apex Transport Planning provides a detailed overview of the site’s connectivity by sustainable modes of travel (at chapter 4). A brief summary is provided below.</p>

Existing site accesses

The site was formally occupied by Tata Steelworks and has historically generated movements onto the network for industrial purposes, including from HGVs. The site has two main accesses from the south onto High Street / Station Road, with two minor accesses onto Woodville Street on the eastern boundary. All accesses are informal priority junction type arrangements.

Walking and cycling

The site is well situated to benefit from existing walking and cycling routes. The site is highly sustainable, being within approximately 500m walk of Pontarddulais town centre, which is connected by continuous footways and crossings. This includes numerous facilities and services, as well as a Tesco superstore. It is also within less than 300m of Pontarddulais rail station, 400m of the closest bus stops and within a 15-minute walk of three schools. Table 4.1 of the TA sets out the proximity of the site to local facilities and services and demonstrates that the site is a highly sustainable location.

In addition, a Swansea Council proposed active travel route runs adjacent to and within the western boundary of the site connecting to Station Road / High Street and then continuing south past the rail station. The proposals will connect to and facilitate the delivery of this route, providing a further active travel connection linking to the closest facilities, as well as an improvement for existing residents.

Pedestrian access is gained from both High Street to the south of the site, as well as Woodville Street to the east of the site. There are footways of c.2m in width along the southern side of High Street and the eastern side of Woodville Street which can be accessed via new pedestrian dropped kerb crossings which are proposed as part of the development. Both streets have street lighting.

The footway on High Street connects to the footway on Station Road which is a key route to Pontarddulais Rail Station and Water Street. At the Station Road / Water Street junction there are signal controlled crossings on both the west and east side of the junction, providing pedestrian connections to the southern side of Water Street.

In summary, there is no existing safety issue for pedestrians within the vicinity of the site, and the surrounding area already accommodates existing pedestrian movements associated with residential use, as well as the adjacent employment uses.

Cycle routes and infrastructure

The existing alignment / geometry and 20mph speed limit along the surrounding streets are considered suitable to accommodate some cyclists on the carriageway and the network of street lighting offers a low-risk environment for both pedestrian and cycle trips to occur during hours of darkness.

Public Rights of Way

There are some public rights of ways within the vicinity of the site, from which residents can benefit from further alternative routes for walking. A key route would be the public footpath which connects Woodville Street to Tyn y Bonau Road.

Public transport

The TA provides a lot of information around public transport, including bus and rail, demonstrating that the site is situated in a highly sustainable location.

	<p>The closest bus stops to the site are located on Water Street at the Pontarddulais bus station within a 400m walk (5 minutes).</p> <p>The bus station is serviced by the 16, L3, and X13 Cymru Clipper. These combined services provide a good frequency connecting to a number of locations including Swansea, Llanelli, Gowerton, Gorseinon, Tycroes and Fforestfach. The journey times from Pontarddulais to Swansea bus station are approximately 40 minutes, and from Pontarddulais to Llanelli are approximately 50 minutes.</p> <p>During the peak hours there are four services per hour, or one service every 15 minutes on average. The services start from 06:21 so are suitable for those commuting, particularly into Swansea (using the X13 Cymru Clipper). Services also extend to Saturday, enabling access to buses six days a week ensuring these are a viable and realistic alternative to the car for residents. Saturday bus services run from 06:21 to 22:28.</p> <p>The closest rail station is Pontarddulais Rail Station which is located approximately a 400m walk to the south of the site. The station consists of one platform and a car park with 20 spaces.</p> <p>Trains departing from Pontarddulais Rail Station are operated by Transport for Wales, and provide connections to Swansea, Shrewsbury, Llandoverly and Llanelli.</p> <p>There is a journey time of c.40-50 minutes for journeys to Swansea, c.14 minutes to Llanelli, as well as c.25 minutes to Gowerton and 11 minutes to Ammanford. There are 12 train services departing from Pontarddulais per day on average and services run from 06:21 to 23:29.</p>
<p>Surrounding designations</p>	<p>The site is located on the western fringe of Pontarddulais and, as set out above, is bound by a variety of land uses including residential, industrial, open space and a well-connected highway network.</p> <p>In terms of designations, to the south of the site is a committed housing site as well as a smaller non-statutory housing site. To the west, beyond the railway line is a landscape protection area and minerals safeguarding area. The proposed development will not interfere with either designation.</p> <p>There are no environmental designations that affect the application site. The closest being the Loughor Corridor Site of Importance for Nature Conservation (SINC) located 0.1km and Waungron Marsh SINC located 0.5km from the site.</p>
<p>Planning history</p>	<p>The site has an extensive planning history associated with the previous, longstanding use of the site as an aluminium factory complex. Whilst the site's past use is significant to its condition and to the context that it sits within, the site's detailed planning history is of limited significance to the proposed development.</p>
<p>Summary</p>	<p>The site comprises vacant, previously developed (brownfield) land located within the settlement boundary of Pontarddulais. It is also allocated for housing led redevelopment in Swansea's adopted LDP. The site sits in an accessible location close to a range of local transport networks, including the M4 corridor.</p> <p>Public transport links are also good and the site itself is not affected by any environmental designations.</p>

The site's neighbours comprise a mixture of houses and commercial and business uses together with the railway line and the surrounding highway network. It is broadly flat and large areas are basically featureless concrete or hardstanding, although there are some pockets and areas of vegetation within the site or on its edges.

Detailed investigations of the site can be found in a number of the documents that support the application. However, from this brief summary it is clear that the site presents a major redevelopment opportunity. This is reflected in the main messages from planning policy which are reviewed in the next section of this statement.

3. PLANNING POLICY FRAMEWORK

Development Plan	<p>Swansea Council Local Development Plan (LDP) was adopted on 28th February 2019 and is the prevailing development plan for the City and County of Swansea. The site is allocated as part of a Strategic Development Area (SD A: South of Glanffrwd Road, Pontarddulais).</p> <p>To support the assessment of the application, the most relevant policies of the LDP include:</p> <p>PS1: Sustainable Places - the delivery of new homes, jobs, infrastructure and community facilities must comply with the plan's sustainable settlement strategy.</p> <p>PS2: Placemaking and Place Management - this policy is reviewed in more detail below.</p> <p>PS3: Sustainable Housing Strategy - land is identified for the development of 17,106 homes to promote the creation and enhancement of sustainable communities.</p> <p>SD1: Strategic Development Areas – an allocation of 12 locations to provide new homes and opportunities for job creation and commercial investment at a strategic scale.</p> <p>SD 2: Masterplanning Principles – this is considered in more detail below.</p> <p>SD A: Land South of Glanffrwd, Pontarddulais – this is considered in more detail below.</p> <p>IO1: Supporting Infrastructure – policy notes that development must be supported by appropriate infrastructure, facilities and other requirements considered necessary as part of the proposal.</p> <p>Policy. H2: Affordable Housing Strategy - a minimum of 3,420 affordable housing units to be delivered over the Plan period.</p> <p>H3: Affordable Housing – refers to the percentage of affordable housing provision required in the 3 different Strategic Housing Policy Zones.</p> <p>SI1: Health and Wellbeing Health inequalities will be reduced and healthy lifestyles encouraged by complying with set criteria.</p> <p>SI3: Education Facilities - where new housing generates a requirement for school places developers will be required to either: provide land and/ or premises for new schools or make financial contributions towards providing additional school facilities.</p> <p>SI6: Provision of New Open Space - provision will be sought for all new housing developments with capacity for 10 or more units. This will include the creation of new on site facilities, or the improvement of existing local provision off site, along with appropriate maintenance contributions.</p> <p>SI8: Community Safety – new development to be designed to promote safe and secure communities and minimise the opportunity for crime.</p> <p>HC1: Historic and Cultural Environment – policy seeks to preserve and enhance the County's distinctive historic and cultural environment.</p>
------------------	--

HC3: Development in the Welsh Language Sensitive Area – development must not negatively impact on the linguistic balance of an area, but instead form sustainable developments which integrate into the social and cultural fabric of the community.

ER1: Climate Change - development proposals will be expected to take account of the effects of climate change, adapt to its impacts, and to ensure resilience.

ER8: Habitats and Species - proposals should not have a significant adverse effect on the continued viability of habitats and species, including those identified as priorities in the UK or Swansea Local Biodiversity Action Plan unless it meets specific criteria.

ER11: Trees and Development – proposals 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.

T1: Transport Measures and Infrastructure - development proposals must be supported by appropriate transport measures and infrastructure, and development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted.

T2: Active Travel – development proposals must enhance walking and cycling access either by incorporation within the site, and/or making financial contributions towards the delivery offsite of specific measures.

T5: Design Principles for Transport Measures and Infrastructure – sets out design criteria that all transport measures/ infrastructure must adhere to.

T6: Parking – new 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.

EU2: Renewable and Low Carbon Energy Technology in New Development - proposals will be required to maximise the contribution of renewable or low carbon energy technology to meet the energy demands of the proposal, particularly for Significant Energy Consuming Developments. Residential developments on sites where there is capacity for 100 homes or more will be required to submit a comprehensive Energy Assessment to determine the feasibility of incorporating low carbon or renewable energy installations into the scheme and/or connect to renewable or low carbon energy technology and district heating networks.

EU4: Public Utilities and New Development - development will be permitted where the utility infrastructure is adequate to meet the needs of the development.

RP1: Safeguarding and Public Health and Natural Resources - development that would result in significant risk to life; human health and wellbeing; property; controlled waters; or the natural and historic environment, will not be permitted.

RP2: Air, Noise or Light Pollution - where development could lead to exposure to a source of air, noise, or light pollution it must be demonstrated that appropriate mitigation measures will be implemented and incorporated into the design of the development to minimise the effects on future occupants.

RP3: Water Pollution and the Protection of Water Resources - development that compromises the quality of the water environment, or does not comply with good water resource management, will not be permitted. 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.

RP5: Land Contamination -development proposals on land where there is a risk from actual or potential contamination or landfill gas will not be permitted unless it can be demonstrated that measures can be taken to satisfactorily overcome any significant risk to life, human health, property, controlled waters, or the natural and historic environment.

RP9: Sustainable Waste Management for New Development - proposals 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.

Of particular significance to the redevelopment of the site are the following policies, which are noted in full below for reference for the assessment of the application proposals.

- PS 2: Placemaking and Place Management
- SD 2: Masterplanning Principles
- SD A: South of Glanffrwd Road, Pontarddulais

PS2: Placemaking and Place Management

“Development must 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, must provide for an attractive, legible and safe environment, and ensure that no significant adverse impacts would be caused to people’s amenity. Depending on the nature, scale and siting of the proposal, development must 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; and*
- xvi. Ensure that commercial proposals, including change of use proposals:*

- a. incorporate active frontages and shopfront designs that make a positive contribution to the streetscene,*
- b. provide appropriate enclosure,*
- c. relate well to the character of the host building, d. do not compromise the ability to deliver priority regeneration schemes.”*

SD2: Masterplanning Principles

“On all sites where there is capacity for 100 homes or more, development must deliver a comprehensively planned, sustainable neighbourhood with distinct sense of place that:

i. Is founded on a comprehensive and coherent Placemaking approach that relates to a masterplan for the entire site that demonstrates:

- 1. a clearly structured walkable neighbourhood with hierarchy of streets and spaces;*
- 2. the provision of internal streets designed for low speeds, having regard to key pedestrian routes;*
- 3. attractive and resilient new buildings that reflect positive aspects of local context;*
- 4. connections to essential social infrastructure and community facilities, including access to District and Local Centres where appropriate; and*
- 5. a phasing schedule to demonstrate the timely delivery of development and supporting infrastructure;*

ii. Achieves net residential density across the site of at least 35 homes per hectare, with higher density residential and mixed uses located along public transport corridors and in focal areas, lower densities on rural/sensitive edges, and a range of densities elsewhere to meet different needs and create distinct character areas; iii. Has sympathetic regard to, and successfully integrates, existing site features, topography, landscape, seascape and views to and from the site;

iv. Integrates key movement corridors, in particular to encourage active travel and use of public transport, including links to the wider area;

v. Creates a network of well overlooked and legible streets and spaces that address townscape and community safety considerations and are not dominated by vehicles;

vi. Provides for multi-functional and connected green spaces that link to the wider area and provide opportunities for relaxation, play and recreation alongside ecological provision in accordance with the Fields in Trust requirements;

vii. Conserves and enhances biodiversity and natural heritage assets, with suitable buffers where required;

viii. Retains and integrates existing important trees and hedgerows, including local native species, to improve local biodiversity and maintain the existing landscape character;

ix. Integrates watercourses, ponds and other water management measures as appropriate within the public realm and landscape, including opportunities for sustainable drainage; and

x. Achieves sustainable building standards and exhibits design that exceed the minimum requirements of Building Regulations where possible. Proposals at Strategic Development Areas must accord with the above criteria and will also be required to:

a. Incorporate spine streets lined by active frontages with shared footways/cycleways on both sides of the street, with verges and appropriate street trees;

b. Deliver a network of streets to serve discreet development areas;

c. Create an accessible site which integrates positively with existing communities and sustainable travel routes, public transport facilities, footway and cycle routes; d. Extend bus networks and increase the frequency and reliability of services to serve the site with public transport options, with a combination of strategic and local bus services;

e. Provide, and/or contribute towards, an appropriate range of social infrastructure and community facilities in central locations, which respond to any local deficiencies in existing provision, and are accessible by all travel modes;

f. Provide Affordable Housing in accordance with the requirements of Policy H3 taking into account any specific financial viability issues arising on the site relating to the provision of strategic infrastructure;

g. Provide new and varied recreation and leisure facilities at appropriate focal points within the new neighbourhood;

h. Provide across the site NEAPs, LEAPs and LAPs in accordance with FIT guidelines, all of which must incorporate appropriate equipment as well as incidental space; i. Provide play opportunities for children of a range of ages, including opportunities for MUGA and other facilities to allow formal and informal play;

j. Provide open space in accordance with the NRW standards for Accessible Natural Greenspace;

k. Provide either a commuted sum for the ongoing maintenance of open spaces and recreation facilities by the Council, or demonstrate that arrangements are in place for a management company or for the site to be managed by an appropriate community organisation;

l. Demonstrate how habitat and species protection and management will be undertaken throughout the site, and if sites are to be gifted to the council provide commuted sums for this purpose;

m. Retain trees and hedgerows wherever possible, and a long term commitment to appropriate management and enhancement, and where hedgerows will be lost implement compensatory measures elsewhere within the site;

n. Provide ecological management plans, detailing how species and habitats on site are to be managed and maintained, to the satisfaction of the Council's ecologist and arboriculturist, including providing sustainable wildlife links across and within the development and suitable protection for protected species;

o. Provide for off-site surface water compensatory removal where required to enable foul connections to be made as part of an agreed scheme to be submitted as part of the planning application, in accordance with the requirements of the Burry Inlet Memorandum of Understanding relating to the treatment of waste and foul water; and

p. Integrate opportunities where appropriate to minimise carbon emissions associated with the heating, cooling and power systems for new development;

The Masterplanning Principles must be communicated by means of a Design and Access Statement and overarching masterplan for the site, and as appropriate Design Codes and

Sub Area Masterplans, to ensure a sufficiently robust planning mechanism to deliver a holistic Placemaking approach throughout the Plan period. SDA: South of Glanffrwd, Pontarddulais Site A is allocated for a comprehensive, residential led, development of circa 486 homes during the Plan period, incorporating a Primary School, leisure and recreation facilities, public open space and appropriate community facilities, employment and commercial uses. Development proposals should accord with the following Placemaking Principles and Development Requirements, which should be delivered in an appropriately phased manner and be formally tied into planning consent.”

PLACEMAKING PRINCIPLES:

“Create a well-connected sustainable extension to Pontarddulais, comprising a number of character areas that integrate positively with the existing District Centre, existing housing clusters, community facilities, Active Travel networks and public transport facilities.

- Create a multi-functional Green Infrastructure network within the site that facilitates Active Travel, taking account of the need to create healthy communities, with particular emphasis on: creating a linear park along the route of the high pressure water main; retaining existing trees and hedgerows within the public realm; retaining the site’s high point with skyline trees; incorporating appropriate landscaping; protecting biodiversity; habitat creation and supporting a range of opportunities for formal and informal play and community led food growing.*
- Face buildings on to open spaces and streets (including Woodville Street) to enhance cohesiveness and ensure community safety and a strong sense of place.*
- Retain and integrate existing farm buildings and farm lanes.*
- Provide a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.*
- Locate new pitches as an accessible focal point within the new neighbourhood.”*

DEVELOPMENT REQUIREMENTS

- “Deliver a minimum 2 form entry Primary School during early phases of the scheme, located to the south of the development area on land north of Pontarddulais Comprehensive School, which must be accessible to new and existing residents by all travel modes. The school must incorporate changing facilities that are available for use by the community in association with the school playing fields.*
- Deliver internal spine street and associated junctions, to run broadly North East to South West through the development from Glanffrwd Road to Tyn y Bonau Road and Station Road.*
- Contribute towards improvements to Pontarddulais Railway Station.*
- Off-site highway improvements having regard to the requirements arising from the necessary Transport Assessment and as identified in the Transport Measures Priority Schedule.*
- On and off-site measures to provide good quality,attractive, legible, safe and accessible pedestrian and cycle linkages in accordance with Active Travel design including the linkages identified in the Transport Measures Priority Schedule references AT1, AT2 and AT3, to the school and Railway Station to the West of the District Centre, and along the EastWest Green corridor and linear park.*
- Incorporate existing PROW within the development by appropriate diversion and enhancement to form legible and safe routes for school and community access, including: – Diversion of PROW ref L/98/1 out of the school grounds – Footpath*

	<p><i>through Tyn y Bonau Farm to follow line of the new spine street or be diverted to an agreed alignment.</i></p> <ul style="list-style-type: none"> • <i>Provide surface water flood control measures in the form of earth bund channelling (to a design to be approved by DCWW) to mitigate the effects of a potential breach and resultant potential overland flows.</i> • <i>Provide replacement industrial units (Class B2, B8 uses) to the west of Tyn y Bonau to facilitate the construction of the new access spine street through the site.</i> • <i>Implement a range of potential environmental enhancements at the existing Pontarddulais Industrial Estate.</i> • <i>Locate less vulnerable uses on the Clayton Works site to complement the District Centre.</i> • <i>Provide for vehicular and Active Travel routes to the proposed school from high and medium density residential areas.</i> • <i>Take measures to protect, promote and enhance the Welsh language as outlined within a Welsh Language Action Plan submitted with the planning application.</i> • <i>Retain as open space a development exclusion zone 25m either side of the High Pressure Water Main.</i> • <i>Provision of affordable housing at the on-site target rate of 20% subject to consideration of financial viability."</i>
Supplementary Planning Guidance	<p>The following adopted Supplementary Planning Guidance (SPG) is of most relevance to the proposed development:</p> <ul style="list-style-type: none"> • Placemaking Guidance for Residential Development (Adopted October 2021) • Car Parking Standards (Adopted March 2012) • Planning Obligations (Adopted March 2010) • Biodiversity and Development (Adopted February 2021) • Planning for Community Safety (Adopted December 2012) • Trees, Hedgerows and Woodlands (October 2021)
Well-Being of Future Generations (Wales) Act 2015	<p>The Well-Being of Future Generations (Wales) Act 2015 came into force on 1st April 2016 and requires <i>"public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle"</i>.</p> <p>There are seven 'well-being' goals set out including aims for:</p> <ul style="list-style-type: none"> • A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work. • A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). • A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. • A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

	<ul style="list-style-type: none"> • A Wales of cohesive communities: Attractive, viable, safe and well-connected communities. • A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. • A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global wellbeing. <p>Within the Act, sustainable development is defined as <i>“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”</i>. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.</p>
<p>Future Wales: The National Plan 2040</p>	<p>Future Wales, published on 24 February 2021, is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.</p> <p>As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.</p> <p>Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time.</p> <p>Key to the redevelopment of the site are the following policies:</p> <p>The Welsh Government's strategic growth strategy is set out in Policy 1, which states:</p> <p><i>Policy 1 – Where Wales will Grow</i></p> <p><i>“The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:</i></p> <ul style="list-style-type: none"> • <i>Cardiff, Newport and the Valleys</i> • <i>Swansea Bay and Llanelli</i> • <i>Wrexham and Deeside”</i>

Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *“Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration”*. Policy 2 of Future Wales is of key relevance in terms of placemaking, it states:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

“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. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.”*

Page 73 of Future Wales states that *“the planning system has a long-established role in the delivery of affordable housing. We are committed to ensuring that new housing meets the needs of all members of society especially those unable to afford to buy on the open market. Echoing the strategic placemaking principles in policy 2, sustainable places are inclusive and welcoming to all; they do not exclude sections of the community or create ghettos of the affluent and the poor”*. Policy 7 relates to the delivery of affordable housing and states:

Policy 7 – Delivering Affordable Homes

“The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. 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.”

Page 76 notes that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”*. The importance of green infrastructure is highlighted further at page 78 by stating that *“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes*

into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being". Policy 9 refers to green infrastructure and biodiversity enhancement stating that:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

"To 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 areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *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."*

Future Wales identifies that transport in Wales is currently dominated by the car and that *"our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to lifelimiting illnesses associated with physical inactivity, loneliness and isolation"* (page 85).

The importance of implementing policies that require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *"to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel"* (page 85).

Planning Policy Wales

Planning Policy Wales (11th Edition, February 2021)

Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Paragraph 2.8 acknowledges that *"planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales"* and *"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"*.

As per Paragraph 2.9, PPW defines placemaking as a *"holistic approach to the planning and design of development and spaces, focused on positive outcomes"*. This approach *"considers the context, function and relationships between a development site and its wider surroundings"* and *"adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary"*.

Figure 5. PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 11)



In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant.

1. STRATEGIC & SPATIAL CHOICES

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan.

Good design

Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 11 sets out five key aspects of good design which are essential to make placemaking happen:

1) Access and Inclusivity

This can be achieved “making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children” (Paragraph 3.6) and through measures and features that “enable easy access to services by walking, cycling and public transport” and “encourage people to meet and interact with each other”.

2) Environmental Sustainability

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement” (Paragraph 3.7) and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”.

Paragraph 3.8 highlights that “landscape and green infrastructure considerations are an integral part of the design process” and, in a similar manner, addressing land

contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

3) Character

Paragraph 3.9 highlights that *“the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”*. It goes on to say that *“the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials”* will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

4) Community Safety

Paragraph 3.11 establishes that *“crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions”*.

5) Movement

Paragraph 3.12 states that good design in this matter means *“minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys”*. It also remarks that *“existing infrastructure must be utilised and maximised, wherever possible”*.

Previously Developed Land

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that *“previously developed (also referred to as brownfield) land [...] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome”*.

The PPW definition of previously developed land is land *“which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure”*.

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that *“development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”*. In this respect, *“the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications”* as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that *“planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling”*.

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that *“appropriate level of car parking is integrated in a way which does not*

	<p><i>dominate the development</i>". Paragraph 4.135 requires new development to <i>"provide appropriate levels of secure, integrated, convenient and accessible cycle parking"</i>.</p> <p><i>Housing</i> Paragraph 4.2.1 advises that <i>"new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities"</i>.</p> <p>Paragraph 4.2.17 acknowledges the potential on brownfield sites to deliver further housing stating that <i>"maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites"</i>.</p> <p>3. DISTINCTIVE & NATURAL PLACES</p> <p><i>Green infrastructure</i> Paragraph 6.2 defines green infrastructure as <i>"the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places"</i> and <i>"at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks"</i>.</p> <p>Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that <i>"with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places"</i>. It is also advised that <i>"there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents"</i>.</p> <p>Paragraph 6.4.21 establishes that <i>"planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible"</i>.</p>
<p>Technical Advice Notes (TANs)</p>	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> • TAN 2: 'Planning and Affordable Housing' (June 2006) • TAN 5: 'Nature Conservation and Planning' (September 2009) • TAN 10: 'Tree Preservation Orders' (October 1997) • TAN 12: 'Design' (March 2016) • TAN 15: 'Development and Flood Risk' (2004) • TAN 18: Transport (2007)
<p>Summary</p>	<p>Planning policy at national and local levels provide a number of positive messages about the potential of the site. National policy establishes a clear preference for the recycling of previously developed sites in sustainable and accessible locations. An approach that is also promoted by the adopted LDP.</p> <p>The site has clear scope to perform very well in delivering new homes and this is recognised in the site's allocation in the adopted LDP.</p>

4. PROPOSED DEVELOPMENT

Overview	<p>The development concept that the application is based on is explained in some detail in the DAS. This document also describes how the masterplan for the site has evolved and the key principles and parameters it is based on. For the purposes of this planning statement, the outline planning application proposes the extensive regeneration of the site and its redevelopment to deliver new housing that will integrate with the existing community at Pontarddulais.</p> <p>When complete the scheme proposes to provide:</p> <ul style="list-style-type: none">• Up to 150 new homes;• A green grid of new and improved open space; and• Revised access and a network of internal roads and paths. <p>At this stage, all matters, aside from the main access, are reserved for subsequent approval, although substantial progress has been made on a number of key issues including internal circulation, landscaping and open space (which will form the green grid that new development will sit within).</p>
Layout and character areas	<p>The DAS provided a lot of information around the site's layout and the character areas established within.</p> <p>In summary, the layout has been developed with the following key considerations in mind:</p> <ul style="list-style-type: none">• Creating a new sustainable, and diverse residential community that actively promotes social well-being and encourages healthy lifestyle choices;• Delivering a coherent layout that fosters connectivity, making the most of opportunities to seamlessly integrate with the surrounding movement network. This approach in turn champions active and sustainable modes of travel.• Establishing a green infrastructure network that seamlessly connects with the existing hedgerow network and semi-natural habitat, facilitating the movement of species throughout the landscape.• Employing sustainable practices to effectively manage surface water flow across the site, channelling it toward the western corner.• Orienting homes strategically to accommodate the installation of solar panels, thereby empowering the development to generate renewable electricity.• Integrating and adhering to established easements, and flood constraints.• Ensuring appropriate separation distances between houses, with special emphasis on maintaining appropriate distances between habitable rooms. <p>The character areas are set around key areas:</p> <ul style="list-style-type: none">• Southern Gateway• Northern Gateway• Woodville Street• Primary Street• Woodland Edge• Green Link• Northern Gateway

	<p>More detail on each of the areas is set out at pages 41-50 of the DAS.</p>
<p>Landscape, environment and open space</p>	<p>The proposals seek to sensitively respond to the site’s softer edges and deliver a new neighbourhood with a strong sense of place and greenery. The layout has been developed to work with site constraints and opportunities. This has in turn enabled the character, appearance, and general feel of the site to evolve.</p> <p><i>Landscape and Open Space Strategy</i> The masterplan allocates a wide variety of open space accordance with Fields in Trust guidelines. These spaces will incorporate informal and formal spaces such as recreational areas and play spaces that cater to different preferences and age groups within the community.</p> <p><i>Parkland And Nature Spaces</i> The Southern Gateway provides large open areas for recreation, informal gatherings and play. Nature spaces surrounding a pond offer tranquility, encouraging residents to connect with the natural environment, fostering a sense of well-being.</p> <p><i>Play and Community Spaces</i> A naturalistic Local Equipped Area for Play (LEAP) will encourage outdoor play and social interaction among children in a safe and natural setting, fostering creativity and physical activity.</p> <p>A formal LAP (Local Area Play) / Community Garden located to the north of the site will offer a play area for children and offer spaces for families to engage in outdoor activities, promoting a sense of ownership and community involvement. This diverse space will allow residents to cultivate plants, fostering social bonds, and promoting sustainable living practices.</p> <p><i>Woodland Trail</i> The western woodland trail will provide opportunities for residents to explore nature, promoting outdoor activities enhancing the connection between residents and the surrounding environment.</p> <p><i>Green Routes And Green Streets</i> The Green Link and green routes will serve as pedestrian friendly pathways, connecting different parts of the community and offering an environmentally friendly way to travel. A network of green streets, incorporating landscape and trees into the urban landscape will promote walking, improving air quality, and enhancing the overall aesthetics of the neighbourhood.</p> <p><i>Sustainability</i> Incorporation of native plants and wildlife-friendly habitats will promote biodiversity and create a thriving ecosystem within the community.</p> <p>Use of sustainable materials, energy-efficient lighting, and water-saving technologies will minimise environmental impact and promote eco-friendly living. Incorporating elements of local culture and history into the landscape design will help create a unique sense of place and identity for the community.</p>

<p>Access and circulation</p>	<p>The site will be accessed from two locations via new priority junctions.</p> <p>The main access would be from a new priority junction provided onto High Street, broadly in the location of an existing site access location. The access road at this location is proposed to have a carriageway width of 5.5m with 6m radii provided onto High Street, which is considered appropriate to serve a development of up to 150 dwellings. A footway of 2m will be provided on each side of the access road. A 5.5m wide access enables two large vehicles to pass on a straight section and is considered appropriate to accommodate all traffic associated with the residential scheme.</p> <p>A general arrangement design of a potential priority junction onto High Street is included in Appendix D of the TA.</p> <p>A second priority junction access is proposed onto Woodville Street towards the northern end of the site. This will be provided with 10 radii and a 6.1m carriageway width on the access road. A general arrangement design of a potential priority junction onto Woodville Street is included in Appendix D of the TA. The arrangements are considered to follow the principles of Manual for Streets and PPW 11, by creating a user hierarchy with pedestrians at the top through the provision of footways into the site and dropped kerbs at the mouth of the junctions to enable safe crossing.</p> <p>The proposed junction arrangements would enable a large refuse vehicle to successfully access and egress the junction in a forward gear as well as allow for two-way vehicular movements without conflict. Swept path analysis has been undertaken demonstrating that the proposed accesses can accommodate a large refuse vehicle turning in and out and this is shown in Appendix E of the TA.</p> <p>The access proposals demonstrate that the site can be safely accessed from the highway network via a priority junction. The access arrangements are considered to be appropriate in terms of geometry, visibility, and deliverability.</p>
<p>Pre-application discussions</p>	<p>The proposals have been the subject of two pre-application meetings with the Council – in July and September 2022. The application proposals have also been considered by the Design Commission for Wales (DCfW). Feedback from both parties has been carefully considered in refining the development proposals for this outline planning application.</p> <p>As part of the pre-application process, feedback was received from planning, placemaking, conservation and heritage, CADW, drainage, ecology, trees, public open space and parks, housing, GGAT and highways.</p> <p>The DAS sets out the different stages to the evolution of the masterplan and includes the various revisions and changes that have taken place during the course of pre-application discussions. In all, there have been 3 different iterations – various changes made largely as a result of ongoing dialogue with the Council.</p> <p><i>Masterplan 1</i></p> <p>The first of the masterplans was prepared following extensive site survey and technical assessment work. Having reviewed the site’s constraints and opportunities, a masterplan was prepared and submitted to Swansea Council to inform the initial pre-application meeting. Feedback was received on the following aspects of the scheme:</p>

- Spine street – the initial masterplan did not include proposals for a spine street as part of the site’s redevelopment. This was done on the basis that the redevelopment of the site does not trigger the need for extensive road improvements to facilitate its delivery.
- Location of Local Equipped Area Play (LEAP) – it was discussed at the meeting and agreed following the meeting that the site’s LEAP could be accommodated at the site entrance in an area that is shown to be at risk of flooding.
- Location of Local Areas of Play (LAP) – it was discussed that there was a need for a LAP in the northern half of the site.
- Higher density of development should be proposed along the site frontage facing onto the area of open space at the gateway of the site.

Masterplan 2

In the initial pre-application meeting, we were asked to incorporate the spine street requirement into the site’s redevelopment proposals. To do this, we considered 3 options.

1. Deliver the spine street along the western boundary of the site (as shown on the Local Development Plan (LDP) concept drawing). However, from our flood risk assessment work, the western boundary of the site is within flood risk and would not be able to accommodate the spine street. Development would also be limited to a single side, raising concerns about the essential creation of a ‘bypass’ around the development. Also, landownership restrictions posed a significant constraint.
2. The total site area is circa 12.7 acres. From our detailed flood risk modelling exercise, only circa 9.5 acres of the land could be considered flood free and developable.

If the spine street were to run through the site, its length within the extent of the site would be circa 360m. The total width of the spine street with its footpaths, cycleways and landscaping is approximately 20m. This would take up another circa 1.8 acres of developable land, leaving only circa 7.7 acres for redevelopment. A reduction in developable land and the cost of constructing the spine street together with the estimated costs provided for site remediation/reclamation and other abnormalities makes this option completely unviable.

Furthermore, from a design and placemaking perspective the delivery of the spine street through the site would create a barrier, limiting social interaction within and through the site.

3. This option considers delivering a spine street along the site’s eastern boundary, proposing that Woodville Street would become more formalised with footpaths and landscaping strips. The new properties from our development would front this new spine street, integrating the site with the existing community. With this option there would be a priority junction at the interchange between High Street and Woodville Street.

With this option, although there would be some developable land take from our site, it wouldn’t be as significant as that with option 2.

Further detail and each masterplan option is included at section 12 of the DAS.

This option was considered to be potentially the most feasible and was considered in more detail and sent to the Council to inform the second pre-application meeting. Feedback primarily centred on ensuring the northern connectivity of the route. The street hierarchy, placement of public open spaces, and townscape principles received substantial support.

Masterplan 3

Following the second pre-application meeting, an adjustment was made to the masterplan that offers a second option for the delivery of the spine street. This masterplan maintains the option of the spine street being delivered along the eastern boundary of the site but also proposes an alternative where the secondary access could move further north and the spine street could be integrated within the development, connecting north should a link through the employment area be feasible in the future.

This masterplan option was sent to the Council following the second pre-application meeting and before Walters' meeting with DCfW. A summary of the feedback received from the meeting with DCfW is provided below with the full response included with the application.

In summary, DCfW noted the following key points in its response to the development proposals:

- *“The site is well located and has considerable potential for a high-quality development.*
- *The proposed layout provides the basis for a permeable street network and includes good walking and cycling routes through the site.*
- *The Commission questions the spine street requirement and strongly recommends the local authority revisit it and take a more strategic, holistic and current approach.*
- *The design team must evidence its work that the LDP spine street concept on this site is undeliverable.*
- *The site has good permeability within it , but improvements are needed to the wider area. The local authority needs to determine how these improvements will be funded and how this scheme should contribute.*
- *The design team needs to develop a simpler, more distinct street hierarchy to inform the character of the different streets. A design-led approach to the street design is needed that goes beyond the current standards-based approach. This should be clearly set out and communicated with appropriate drawings and diagrams in the Design and Access Statement.*
- *A more compact urban form is needed to achieve a higher density of development.*
- *The site should accommodate a mix of uses/amenities to meet the needs of the people living there and add vitality to the neighbourhood, reflecting a place focus.*
- *The green spaces should create a social focus for the community. The Local Area of Play should be located centrally within the development and the large green space to the south needs further design work to create an attractive public space for the community.*
- *The development would benefit from a clear identity drawing in on the site's heritage.*
- *The design team need to establish how the development will meet the vision of creating a new neighbourhood designed for ‘sustainable living’.*
- *The masterplan should establish a framework that shapes, guides, and controls the quality of the development. It is evident that care has been taken in the approach to the site and it is important that this is not lost if the site is developed by third parties with other priorities.*
- *The developer is encouraged to take a plot-based approach to the development and enable smaller developers and local people to build the homes.”*

In summary, overall the LPA's feedback has been positive with discussions largely centred around the following key topics relevant to the proposals:

- Placemaking
- Open space and green infrastructure
- Spine street

The application is being submitted in outline. Nevertheless, from the outset, placemaking principles have been a key theme running through the course of the pre-application meetings with the Council and the Design Commission for Wales (DCfW).

A strong emphasis has been placed on the need to develop distinct yet connected character areas, centred around a well-considered street hierarchy and connected Green Infrastructure. High quality gateways into the site with focal points to create memorable places and aid legibility have been a key theme including the need to deliver landmark buildings in key locations.

Feedback received in the first pre-application meeting helped to refine the placemaking principles of the masterplan for discussion in the second pre-application meeting. In that meeting, the Council provided positive feedback to the masterplan's placemaking principles including the street hierarchy, location of public open space (POS) and increasing density along the area fronting the large area of open space at the gateway of the site.

In terms of open space and green infrastructure, the Council agreed that the site deliver an overall improvement in the type and amount of open space being delivered on site. This is provided in the form of a large area of open space at the gateway of the site that includes a LEAP. Two LAPs are also provided to ensure access for future site residents and existing residents in the vicinity of the site. A grid of green connections are also proposed running north to south and east to west within and along the boundaries of the site. Further detail is provided in the DAS prepared to support the application.

With regard to the spine street, while Walters maintain that it is not required for the redevelopment of the site, two potential options for its delivery are provided in the masterplan submitted in support of this application.

5. KEY PLANNING CONSIDERATIONS

<p>Introduction</p>	<p>Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues relevant to the determination of the application and assess the scheme against the Development Plan.</p> <p>The development concept that the application is based on is explained in some detail in the DAS. This document also describes how the masterplan for the site has evolved and the key principles and parameters it is based on. For the purposes of this planning statement, the outline planning application proposes the extensive regeneration of the site and its redevelopment to deliver new housing that will integrate with the existing community at Pontarddulais.</p> <p>When complete the scheme proposes to provide:</p> <ul style="list-style-type: none"> • Up to 150 new homes; • A green grid of new and improved open space; and • Revised access and a network of internal roads and paths. <p>At this stage, all matters, aside from the main access, are reserved for subsequent approval, although substantial progress has been made on a number of key issues including internal circulation, landscaping and open space (which will form the green grid that new development will sit within).</p>
<p>Planning policy and land use planning</p>	<p>The application site is allocated as one of two sites under policy SD A (South of Glanffrwd Road, Pontarddulais) in the Swansea LDP for a comprehensive, residential led, development of circa 486 homes during the Plan period, incorporating a primary school, leisure and recreation facilities, public open space and appropriate community facilities, employment and commercial uses.</p> <p>The site forms a fundamental part of the LDPs sustainable housing strategy set out in Strategic Policy PS 3 which provides for the development of housing to meet the identified housing requirement of 15,600 homes with a significant contribution from the creation of new neighbourhoods at Strategic Development Areas within and on the edge of established settlements.</p> <p>The application site covers the area of the former Tata steelworks factory complex. It is wholly previously developed and vacant land and the site's past use has left both a legacy - in terms of its condition - as well as an important opportunity. Planning policy at all levels supports the effective reuse of previously developed (brownfield) land.</p> <p>It is clear in this context that residential redevelopment of the site (that this application proposes) is acceptable in principle and will help the Council accommodate its housing requirements in a fundamentally sustainable way. A very large area of land will be recycled and this will help to relieve pressure for housing that is always in demand and which other owners and developers may want to steer towards greenfield or undeveloped land.</p> <p>Redevelopment of the site will improve housing land supply in the County through the delivery of a site that is viable and deliverable.</p>

	<p>On this basis the scheme and the uses it proposes clearly and positively meet the primary tests of national and local planning policy.</p>
<p>Design and character</p>	<p>A DAS (ref. Issue 01 October 2023) has been prepared by Hammond Architectural Limited to support the development proposals.</p> <p>The DAS demonstrates that the scheme responds very well to the general obligation on all developers to achieve high quality new development which reflects local context and improves our urban areas.</p> <p>The DAS explains in some detail how the scheme has evolved and the assessments, principles and objectives it is based upon. It also sets out the vision, site analysis and parameters of the masterplan. This responds positively to the site’s urban neighbouring uses (to the north, east and south) and the natural environment (that borders the site to the west), together with the site’s key features.</p> <p>This context has guided the form and content of the scheme. The DAS sets out the different stages to the evolution of the masterplan and shows how the project will transform the appearance and performance of the whole site and create a safe, attractive, high quality accessible and convenient environment. The fact that the scheme is based on new housing means that the proposals can retain and enhance the best parts of the site, whilst positively considering the conditions of those living close to it.</p> <p>The DAS also provides evidence of the quality of the development that Walters propose.</p>
<p>Highways and accessibility</p>	<p>A TA has been prepared by Apex Transport Planning Ltd (ref. C23025/TS01) which sets out transport and access considerations for the application proposals.</p> <p><i>Vehicle access</i></p> <p>As set out in section 4, the site will be accessed from two locations via new priority junctions. The main access would be from a new priority junction provided onto High Street, broadly in the location of an existing site access location. A second priority junction access is proposed onto Woodville Street towards the northern end of the site.</p> <p><i>Pedestrian and cycle access</i></p> <p>Pedestrian access will be gained from a number of locations including the footways running adjacent to the site access connecting to High Street and from the active travel route being provided along the western boundary (forming part of Active Travel Route SWA6) connecting north from Woodville Street to Station Road in the south. There will also be active travel connections linking to the eastern boundary of the site onto Woodville Street. Dropped kerb crossings will be provided at the vehicular accesses to ensure pedestrians can cross the access safely.</p> <p>A shared footway / cycleway is proposed along the site frontage on High Street and Woodville Street to accommodate pedestrians and cyclists and improve the existing active travel environment. This would be separated from the carriageway via verge to further enhance the attractiveness of this route. This will connect to Station Road and dropped kerb crossings will be provided to connect with the existing footway on the southern side of High Street and along Station Road.</p>

A dropped kerb crossing will also be provided opposite the public footpath connecting Woodville Street to Tyn y Bonau Road, this will link to an active travel route through the site from west to east, which connects to the route running within the western edge of the site (forming part of SWA6).

The extensive active travel routes and dropped kerb crossings will provide an enhancement to the existing active travel facilities in this area, as well as facilitate the delivery of part of a Swansea Council proposed future active travel route.

The internal arrangements are considered safe and suitable for this site which will also have a low-speed environment and the design of the site and multiple connections points will encourage walking and cycling movements.

The site is well connected to its surroundings and enhances the existing facilities available to residents. As such, this ensures a fully permeable development consistent with the requirements in PPW 11.

Site layout

There will be a network of streets within the site, which will include a spine street, primary streets, secondary streets and tertiary streets. The full details of the street and movement hierarchy are provided in Appendix F of the TA.

The primary street running through the site will have a width of 5.5m and can serve dwellings along its frontage and enable access to internal driveways and shared space areas. This will also provide 2m wide footways on each side and have a semi-formal landscaped verge on one side.

The primary street will link to both secondary streets, which would be of a similar standard, and tertiary streets which would be more of an informal shared surface type layout with low kerb upstands for pedestrian movements. These would be on the quieter streets within the site.

The internal site layout will be designed to minimise the speeds of vehicular traffic and prioritise walking and cycling movements and will include the provision of shared surfaces, where appropriate. This is in accordance with the transport hierarchy in PPW11. Details of the internal roads will be agreed as part of the reserved matters approval.

The site will be designed to keep speeds to 20mph or below and suitable forward visibility around bends would be provided for 15-20mph speeds (15-25m). Two large vehicles will be able to pass along the primary road, including at bends. The access road would be designed to adoptable standards with a maximum gradient of 1:12 along its length.

Refuse vehicles can manoeuvre around the site safely and appropriately, with access road widths appropriate to accommodate these vehicles. Where required, turning heads can be provided within the site, and these are shown in the illustrative masterplan. As such, refuse vehicles will be able to enter and exit the site in forward gear.

The site layout would therefore be designed to be safe and suitable for a residential development of up to 150 dwellings and accommodate all vehicles likely to use the site.

Spine street

As part of the site's allocation, the LDP sets out a requirement to deliver an internal spine street as part of the overall development. To accord with policy, the site masterplan

includes two options for the provision for the delivery of the spine street should this be forthcoming in the future. However, despite its inclusion, Walters maintain that a spine street should not be required as part of the site's redevelopment for a number of reasons. The main justification is set out in the TA but in summary, it is for the following reasons:

- The former Tata site can accommodate its own traffic generation on the existing network without triggering the need for a wide spine street through the centre of the site.
- Supporting text to the policy sets out that the requirement for the spine street is to redirect HGV movements away from Glynhir Road and to provide a route for urban traffic from Glanffrwd Road. However, the Persimmon site is not proposing to deliver a through route along the spine street for all vehicles with a bus gate provided along the link allowing only bus movements. On this basis, the need for the spine street to accommodate HGVs and existing vehicle movements cannot be delivered. More importantly, the ATCs show that there are already HGV movements using Woodville Street, High Street and Tyn y Bonau Road and so the streets are already suitable for accommodating these movements without evidence of safety issues.
- The full route of the proposed spine street, as shown by the allocation, cannot be delivered as there is a fully let employment site between the two parcels of land which comprise the SD A allocation.
- Delivery of a wide spine street which for all intense and purposes would be similar to a bypass type road is contrary to Welsh Government's current position on road building projects, particularly in light of the declaration of a climate and nature emergency. The delivery of an improvement for vehicular access in the form of a bypass will not help promote a modal shift to more sustainable forms of transport.
- The provision of a spine street through the centre of the site would cause a viability issue for the delivery of this brownfield site and would lead to a poor quality, vehicle dominated environment, with a wide highway through its centre, leading to faster speeds or unnecessary traffic calming. This is contrary to the latest position from the Welsh Government. As such, it is considered that the delivery of the numerous active travel improvements as a result of the scheme, as well as the highly sustainable location of the site itself would be in accordance with the latest Welsh Government policies, and would be of the most benefit to existing residents, and the delivery of a spine street should not be a requirement for this site.

Parking

The proposed parking provision will be fully in accordance with the Swansea Council parking standards, as well as the objectives for encouraging sustainable travel and reducing car use as set out in PPW11 and Future Wales. The site also meets the criteria for a reduction in parking provision, given its sustainable location.

Cycle parking

The Swansea Parking Standards SPG sets out the cycle parking standards in Appendix 3 of the TA. For any residential apartments, there is a requirement for 1 stand per 5 bedrooms. These would be provided in secure and covered cycle parking shelters.

All houses will be provided with secure cycle parking within the curtilage of each individual dwelling, in line with the Swansea Council guidance. As such the proposals can provide an

	<p>appropriate level of cycle parking in accordance with the guidance and the full details of this will be agreed as part of a reserved matters application.</p> <p>The proposals will be able to accommodate service and delivery vehicles appropriately and these vehicles can enter and exit the site appropriately at each access point.</p> <p><i>Trip generation and traffic impact</i></p> <p>Trip generation analysis forecasts that the proposals would generate a slight increase of 34 to 42 vehicle movements in the network peak hours in comparison to the existing industrial site use. These movements would disperse in different directions from the site accesses, although the majority of movements are likely to route via the Station Road / Water Street signal controlled junction.</p> <p>It is forecast that the proposal would increase movements through this junction in comparison to the existing use by approximately 20 vehicles, in the peak hours. This would equate to between a 1.3% and 1.7% percentage increase in all movements during the network peak hours. This would not have a material impact on the operational capacity of the network and is well within the 5% threshold levels stated within TAN18.</p> <p>Beyond this junction, the increases would be lower as vehicles dissipate across the network, so there would be significantly less than a 20 vehicle increase at all other junctions. As such, it is not considered that the development would have a material impact on the operation of the wider network.</p> <p>However, for robustness, an operational assessment of the Station Road / Water Street / Tidal Reach signal controlled junction was undertaken using LinSig. The assessment is robust and has been undertaken in a 2028 future year considering unfettered traffic growth (which may not occur) and no offsetting for the existing site traffic generation. The assessment demonstrated that the development generated traffic would generate a minimal change in operation at the junction.</p> <p>A further sensitivity analysis was undertaken including the other parcel forming the overall SD A allocation, which is being brought forwards by Persimmon Homes. With the addition of the additional traffic generated by the entire allocation, the junction would operate over capacity, particularly in the PM peak. The Persimmon application has suggested the implementation of MOVA control at this junction to improve the efficiency of the operation. As such, Walters Group would be willing to provide a proportionate contribution (at a level to be agreed) towards the implementation of this improvement. Physical works to provide further capacity, for example through amended geometry and increased queue storage or additional flare lanes are therefore not considered to be required or desirable and would not encourage a modal shift in accordance with Welsh Government policies.</p> <p>A Framework Travel Plan has been produced which sets out measures to further minimise the impact of the development on the network and encourage a modal shift. This will be produced in full prior to occupation and measures implemented accordingly.</p>
Flood risk	<p>JBA Consulting has prepared an FCA (ref. JQE-JBAU-XX-XX-RP-Z-0001-S3) to support the development proposals.</p> <p>The report confirms that the proposed area of development is 3.93ha in size and is brownfield land, currently comprising of hard standing and former industrial buildings. The River Loughor flows in a southerly direction west of the site. The River Dulais flows in a</p>

	<p>westerly direction through the centre of Pontarddulais south of the site, before flowing into the River Loughor to the west of the railway station.</p> <p>The development proposals are classed as highly vulnerable development by TAN 15 with the site located in DAM Zone C1. Zone C1 is described as “areas of the floodplain served by significant infrastructure, including flood defences”. Highly vulnerable development within Zone C1 is permitted, subject to the application of a Justification Test.</p> <p>The site is at low to moderate risk of groundwater flooding, river flooding and surface water flooding. There is no risk of flooding from reservoirs or tidal flooding. Finally, there is no evidence of flooding from sewers.</p> <p>The proposed development benefits from flood defences at both the River Dulais and River Camffwrdd. These defences are newly constructed and built to present day design standards. Ground levels on site will be increased in some areas to provide a minimum ground level of 9.03mAOD. This will result in a development plateau free of flooding in all TAN15 design events, including the extreme 0.1% AEP event. Flooding within the site will be limited to areas of water compatible public open space.</p> <p>Detailed hydraulic modelling has been used to inform the design of the development and to ensure that the proposals will not increase flooding elsewhere.</p> <p>In summary, the FCA demonstrates that all requirements of TAN 15, including all acceptability criteria, have been satisfied. Consequently, it is concluded that on the grounds of flood risk, the proposed development meets the requirement set out in TAN 15 and the aims of Planning Policy Wales.</p>
<p>Drainage</p>	<p>Phoenix Design Partnership Ltd has prepared a DS (ref. 10373), which concludes the following:</p> <ul style="list-style-type: none"> • The site is located within Flood Zone C1, minimum ground level of 9.03mAOD has been set; • An existing Welsh Water surface water sewer crosses through the south of the development; • Existing site surface water drainage discharges through an existing culvert to the west through the railway line; • Site investigation and soakaway testing has been carried out. The northern section of site will be able to infiltrate; • Site drainage system will require SAB approval and adoption; • Discharge into the existing culvert will be reduced as flows will be restricted to a calculated QBAR rate which considers existing urban extents. A 30% betterment will be required as per the Welsh Government standards; and • Foul drainage will discharge via existing connection into the combined sewer to the south.
<p>Ground conditions</p>	<p>Integral Geotechnique has now completed intrusive site investigation works at the site. The results of which are set out in its SIR (ref. 14180/FG/23/SI/RevA). Below is a brief summary of the assessment work completed on the site together with observations and conclusions.</p>

Site History

The site has been in use since 1879 evidenced by the earliest available historical maps. A list of the uses and any notable features on site are listed below:

- Tin plate works, iron and brass foundry, coated metal works, steel works and engineering works.
- Gravel pits, gasometers and storage tanks have been noted to exist on site.
- Railway routes have been developed and demolished through the central site area.
- Stockpiles and spoil heaps have existed, with some now removed in the present day. Three stockpiles are evidenced to remain.
- Widespread development of industrial buildings, warehouses and factories.
- History of previous development and redevelopment, including demolition of buildings and earthworks throughout the history of the site.

Geology and Hydrogeology

A summary of the main geological and hydrogeological features of the site are summarised below.

- The underlying geology beneath the site varies laterally and vertically. Geology maps indicate the site is underlain by strata of the Swansea Member, Grovesend Formation and Hughes Member within the eastern, southeastern and western site areas respectively. These rocks generally comprise variations of either sandstone, mudstones and siltstones. Bands of thin coals are also common. The geology map indicates the dip of strata in the vicinity of the site to be approximately 12o to 15o in a southerly to south westerly direction. A fault runs through the centre of the site in a north-south orientation. A coal seam is indicated to the northwest, and in the southeast, with both terminating at the fault.
- Superficial Glaciofluvial Deposits of the Quaternary period are indicated to overlie the solid strata. These deposits would be typically poorly sorted and variable in nature comprising sands and gravel.
- Due to the past developments within the site the superficial deposits would be anticipated to be overlain by a layer of made ground and/or reworked materials of unknown but variable thickness.
- OS Water network maps indicate the nearest surface water feature to be the pond on site. A watercourse also flows south approximately 33m southwest of the site before joining the river Lougher situated 153m west.
- Both the superficial and bedrock geology underlying the site are classified as Secondary 'A' aquifers.

Site Investigation

A site investigation has been carried out across the site in order to determine the underlying ground conditions, obtain representative soil samples for geotechnical and chemical testing, and inform the likely foundation solution for the proposed development. The site investigation comprised:

- An intrusive investigation carried out in March 2023 through to early April 2023 comprised the excavation of 21 No. machine excavated trial pits (TP01 to TP21) and indicative soil infiltration tests at 6 No. trial pit locations (TP01, TP06, TP08, TP11, TP14 and TP15), the drilling of 8 No. windowless sample boreholes internal to the exiting building, including concrete coring (WS01 to WS08), the drilling of 6 No. shell and auger boreholes with the installation of six combined ground gas and

groundwater monitoring standpipes (BH01 to BH06) and the drilling of 4 No. rotary probeholes.

- Sampling of in-situ soil/fill for laboratory chemical testing
- Sampling of stockpile materials for laboratory chemical testing
- Sampling of in-situ fill/natural soils for laboratory geotechnical testing
- Sampling of groundwater for laboratory chemical testing
- Monitoring for concentrations of methane, carbon dioxide, oxygen, hydrocarbon vapours and gas flow. In the standpipes installed in the shell and auger boreholes.

Ground Conditions

The ground conditions encountered beneath the site generally comprised a surface covering of topsoil, made ground or hardstanding material of concrete or bituminous material. Underlying the surface material, made ground was encountered across much of the site to a depth of between 0.6m to 3.2m below ground level. Underlying the made ground, superficial deposits comprising clay/ silt, sand and gravel were encountered. The superficial deposits were proven to depths in excess of 30m.

Generally, the ground conditions comprise deepening made ground deposits towards the southern end of the site. Encountered natural soils comprise medium dense to dense sands and gravels. It should be noted that a band of shallow soft silt/clay was encountered overlying the sand and gravel deposits within the central site area. This band may be representative of an old flood channel that once flowed through the site towards the River Loughor.

Coal Mining

The Coal Authority information indicates development high risk areas in the southeast and northwest parts of the site, associated with a coal seam that is intersected by the north south trending fault. As a result of the fault the development high risk areas are very limited in extent within the site.

Four rotary boreholes have been drilled across the site in order to check for any associated shallow mine workings/coal seams, including two boreholes drilled within the development high risk areas. Thick superficial soils were encountered beneath the site to greater than 30m depth and hence there was no evidence of shallow mine workings. Therefore, the risk to the site from subsidence associated shallow coal mine workings is considered to be low.

Soakaway Testing

Soil infiltration/soakaway testing was carried out at 6 No. locations across the site.

The soil infiltration testing was more successful in the northern part of the site with soil infiltration rates of between 2.6×10^{-4} and 8.8×10^{-5} m/sec recorded in TP01 and TP06.

Elsewhere, within the southern part of the site the soil infiltration was limited.

Contamination

Samples of soil were sampled and tested and results are typical of a brownfield site of this nature. Exceedances of metals, several PAH compounds and a singular exceedance of petroleum hydrocarbon were recorded within the soils. Asbestos was also recorded at several locations across the site. No PCBs were recorded in any soil samples tested, with all samples being below the laboratory detectable limits.

No evidence of any gross contamination was observed and results indicate routine garden capping to all private gardens and areas of soft landscaping, as is typical of a reclaimed brownfield site of this nature. Capping thickness to comprise minimum of 600mm of clean soils in the central and southern areas of the site, potentially reducing to 300mm in the northern part of the site, in areas where made ground is absent, and subject to appropriate testing.

Groundwater contamination testing completed to date indicates no elevations of contaminants across the site, with the majority of potential contaminants tested being below the laboratory detection threshold. It should be noted that these results are based on one round of testing to date.

The results to date indicate that the site does not present a potential risk to controlled waters. Ground gas monitoring indicates the site to be at a low risk from ground gas. No ground gas protective measures are considered to be necessary. Note this is based on 3 rounds of monitoring completed to date.

Preliminary Conclusions and Recommendations

Following demolition of the existing buildings, and based on the findings of the site investigation, it is recommended that the site is subjected to a turn and compact earthworks reclamation in order to create a suitable development plateau for the proposed development.

At this stage, the following works are considered:

- Across the central and southern areas of the site, breaking out of hardstanding and residual obstructions (foundations, pits, pipes, walls, etc) to a minimum of 2.0m below proposed remediation plateau level, followed by sorting, crushing and processing of acceptable demolition material to a suitable grade for re-use on site as structural fill.
- Excavation of made ground to typically 1.0m to 1.2m below ground level will be required, with removal to typically 2.0m to 2.7m locally. Soft silt/clay bands will be required to be removed to approximately 1.0 to 1.5m below proposed reclamation plateau.
- Processing of all stockpiled materials for reuse on site, subject to geotechnical suitability.
- Reduced levels should be proof rolled, any soft spots/areas should be removed.
- Any reduced formations should then be brought back up to the required level with suitable acceptable materials, placed and well compacted in layers in accordance with the Department of Transport (DTp) Specification for Highways Works.
- Foundations within the site will likely comprise traditional strip/ trench fill foundations within the northern site area and raft foundations on re-engineered fill in the central/southern site area.
- All gardens and areas of soft landscaping to be capped by minimum of 600mm of clean soils in the central and southern areas of the site, potentially reducing to 300mm in the northern part of the site, in areas where made ground is absent, and subject to appropriate testing.
- Japanese knotweed has previously been identified on site and it is recommended that a full vegetation survey is undertaken. It is recommended that treatment with an appropriate herbicide is carried out at an early stage in order to reduce the spread of Japanese Knotweed.

<p>Noise and vibration</p>	<p>Hunter Acoustics Limited has undertaken noise and vibration surveys at the site, the results of which are set out in the report prepared to support the application (ref. 6893/ENS1). The report concludes that road traffic is indicated to control the ambient noise climate day and night.</p> <p>Noise map models have been generated to show noise propagation across the undeveloped site. The majority of the site falls under NEC A of TAN 11 and therefore overall, noise should not be a reason for concern for residential development.</p> <p>Vibration levels are indicated to fall below thresholds typically applied in Local Planning Authority conditions. Industrial noise was identified at the northern boundary of the site however an adverse impact is indicated less likely and residential development at the northern site boundary should not be restricted. Proposed external building fabric measures are indicated to be sufficient to control internal noise intrusion.</p> <p>Garden noise levels are indicated to fall below the 50dB garden criteria of BS 8233:2014 with the inclusion of a 1.8m close boarded garden fence.</p>
<p>Environmental acceptability</p>	<p>A similarly rigorous approach has been taken to the softer environmental issues that the prospect of comprehensive redevelopment of the site raises. Since securing control of the site Walters has commissioned a comprehensive, timely and detailed series of investigations. These have included a full suite of ecological surveys, an aboriginal assessment and a detailed investigation of the historic environment and the archaeological potential of the site.</p> <p>As a result the assessment of the environmental effects of the scheme clearly indicates that no unacceptable impacts are caused, and in many cases the scheme triggers an important improvement to the appearance, performance and potential of the site. A summary of the main conclusions of the reports are provided below.</p>
<p>Ecology</p>	<p>A Preliminary Ecological Appraisal (PEA) (ref. J0023-PEA-v1.2) has been prepared by Sylvan Ecology to support the application.</p> <p>In summary, the site is considered to be of low ecological value with the habitats on site with the highest ecological value being broad-leaved trees, woodland and the pond.</p> <p>In terms of protected species, the report confirms the following:</p> <p><i>Bats</i></p> <ul style="list-style-type: none"> • An external examination of the on-site buildings found that bats are known to be roosting in one of the buildings on site. • Trees with bat roost potential were identified. • Suitable bat foraging/commuting habitat occur throughout the site. <p>As a result, it is recommended that woodland habitat be incorporated into the new design and any trees scheduled to be lost should be inspected for bat suitability.</p> <p>For the buildings, bat emergence surveys have been undertaken to determine species present, abundance and distribution across the site to devise a suitable mitigation strategy.</p>

Birds

Birds' nests were noted during the site visit within the hedgerows and woodland. However, subject to adopting the recommended precautionary mitigation measures, birds will not preclude the site's development.

Reptiles

Based on the desk study records and the habitat present on site, there is a low possibility of reptiles being present within the boundary vegetation.

However, habitats suitable for reptiles will be subject to presence/absence surveys and should reptiles be identified on site, the survey findings would be used to devise a suitable mitigation strategy.

Dormice

The woody areas within the site are isolated and provide negligible potential for dormouse.

Great Crested Newts

There is a pond within the application site, however there is a negligible network of drainage ditches and ponds within the surrounding area. Therefore, based upon the desk study records and the habitats present on and off site, there is a low possibility of GCN within the application site.

Habitats suitable for GCN breeding will be subject to presence / absence surveys using eDNA analysis. Should GCN be identified on-site, the survey effort will need to increase to establish a population estimate, which would be used to devise a suitable mitigation strategy.

Invertebrates

Based upon the desk study records and the habitats present on site, the site is considered unlikely to support any important populations of notable invertebrate species. Invertebrates are not therefore anticipated to preclude development of the site.

Badger

No evidence of badger setts or badger foraging were recorded within the site and the site is considered to have low suitability for badger sets due to its open nature. However, it is possible that badgers occasionally access the site at night to forage.

Wild mammals

No mammal signs were noted during the survey; however, the site may be used by other wild mammals such as hedgehog, which, in 2007, were added to the UK BAP priority species list, on account of its rapid decline. Based upon the desk study records, other notable species which have been recorded include stoat, weasel, and polecat.

It is recommended that good building practices are adopted during the construction phase to safeguard any individual animals which venture onto the proposed development area.

Invasive Species

Japanese knotweed was located within the southeast of the site and so a further invasive species survey will be required.

	<p>In conclusion, providing the recommended mitigation measures and surveys are adopted, relevant nature conservation legislation will not be contravened, ecological impacts of the development will be reduced to a minimum and ecological issues are not, based upon the available information, anticipated to preclude the site's development.</p>
Trees	<p>An Arboricultural Report (ref. J0023-Arb Report-V1.1) has been prepared by Sylvan Ecology to support the outline planning application.</p> <p>It concludes that the trees on site are dominated by areas of overgrown willow scrub and, as a result, many have grown too close to each other which has adversely impacted their growth, and or been subject to unsympathetic pruning. The condition of these trees and the groups has been classified in line with B.S.5837. The table in the report sets out that there are no category A trees. There is one category B1 tree on site, which will not be affected by the development proposals. All other individual trees are category C1.</p> <p>There is a category B1 group of trees located around the pond that will need to be cleared to deliver the development proposals. However, this is in an area where no housing development is proposed but proposals would see the area brought forward as open space – seeking to enhance the pond area and its surroundings to deliver an open gateway into the site that would also see many trees provided to compensate the loss.</p> <p>The report also notes that species diversity is low as the majority of the trees on site are from overgrown scrub and consist primary of willow or other fast growing species.</p>
Heritage	<p>An Archaeological Assessment (ref. edp8269_r0002a) has been prepared by EDP to support the application. The report confirms that The Site does not contain any designated historic assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Historic Landscapes, Registered Parks and Gardens or Conservation Areas) that would pose a constraint to development.</p> <p>Available baseline information records four non-designated historic assets within the Site. However, only two of these historic assets relate to extant archaeological remains within the Site:</p> <ul style="list-style-type: none"> • Extant archaeological remains associated with the Glamorgan Works (GGAT01225w) comprise two stone built buildings likely associated with the original 1870s tin plate works, as well as segments of the eastern stone boundary wall to the Glamorgan Works. The two historic buildings are of low significance based on their limited architectural and historic interest and the remaining segments of the boundary wall are of negligible significance based on its practical function and limited historic interest; and • The presence of one of the southern, former reservoirs to the Glamorgan Works, recorded as 'gravel pits' by the HER (GGAT10086w). The present-day condition of the extant pit consists of a water-filled hollow enclosed by woodland vegetation. This feature is of negligible significance, reflecting associated landscaping features associated with the Glamorgan Works during its operation. <p>The Site has been identified to have a very low potential for Prehistoric to medieval remains and moderate-high potential for post-medieval to modern remains. Any encountered remains would likely comprise late 19th century to 20th century industrial</p>

	<p>remains (e.g. building platforms, building foundations, railway spur foundations, waste pits). These would be of very low to low significance.</p> <p>Overall, there would be loss of known, low value archaeological remains from the development within the Site. These would be associated with the demolition of the two historic buildings and boundary wall within the Site associated with the Glamorgan Works (GGAT01225w), identified to be of low and negligible significance, respectively. In addition, the potential for buried unknown archaeological remains to be subject to alteration and/or destruction from groundworks associated with the proposed development has also been identified. As such, these adverse impacts would be considered as part of the planning balance as per Paragraph 6.1.25 of Planning Policy Wales (PPW) 11. Otherwise, the proposed development is compliant with national and local planning policies as set out in Section 2 of this Archaeological Assessment.</p>
Overall benefits	<p>These local environmental improvements are supported by some significant local community benefits that will be triggered by the development of the site, which include:</p> <ul style="list-style-type: none"> • The provision of a large number of modern homes in a high-quality new environment. • These will satisfy a social need that the Council must plan for, on a previously developed and accessible site; • The creation and improvement of a large area of public open space in a variety of forms; and • Redevelopment of the site for a fundamentally neighbourly use. <p>These are important benefits. However, they are complemented by a number of significant and very positive economic impacts. These mainly come from the preparation of the site and surrounding area, together with the construction and occupation of the new housing. This is because housing construction supports more jobs than investment in many other sectors of the economy, because of the amount of economic activity that is connected to it (in the supply chain). Housing development therefore provides an important economic function by:</p> <ul style="list-style-type: none"> • Creating jobs which can be local, varied, skilled and durable; • Providing for a variety of direct (on site), indirect and induced employment opportunities; • Providing a major source of vocational training and education; • Acting as a pump primer and funder of social and physical infrastructure; and • Increasing housing supply and improving housing affordability. <p>In this light it is clear that the project can play an important part in improving the economic prosperity of the local community.</p>
Delivery	<p>The fact that this can be achieved reliably - because of the use that is proposed and because of the company that is behind the application – is equally important. Walters is a land development company with a long and successful track record in regeneration and development. It has bought the site to develop and will start this process as soon as it has the necessary planning permissions and other approvals. It has already invested heavily in the preparation of this application and the intelligence that lies behind it. Subject to securing the necessary approvals, there is potential to start on site for advance works in</p>

the summer of next year. If this is achieved, housebuilding could commence by the end of 2024.

Walters will also act as master developer for the site, and its sustained interest in the development of the whole project, will mean that its intention to commence quickly will be matched by its commitment to deliver high quality development based on the principles and proposals that run through this application.

6. CONCLUSIONS

This planning statement forms part of a series of documents that supports an outline application for the redevelopment of the former Tata steelworks site in Pontarddulais. It captures a series of key messages from these documents – which include a DAS, FCA and TA – and reviews planning policy for the site and the development proposed. The following key conclusions can be made:

- The basic characteristics of the site – in terms of its condition, past use and location – mean that its regeneration and redevelopment is a key priority for national and local planning policy.
- There is strong support for the delivery of housing on the site, which is set out in the site's allocation under policy SD A of the adopted LDP.
- Housing has also allowed and encouraged the preparation of a high quality masterplan for the site which reflects the opportunities presented.
- The site can also support the proposed scheme, and no unacceptable environmental impacts will be triggered. This reflects the results of a comprehensive assessment of the site, the area it sits within and the physical and social infrastructure that serves it.
- Key technical issues - and in particular flood risk, drainage, transportation and ground conditions - have been thoroughly investigated and solutions have been devised.
- There will be a series of positive impacts associated with the scheme which will transform the former factory complex, accommodate necessary development pressures (and relieve the pressure to release other land for this development in less sustainable greenfield locations) and provide a lasting, high quality solution for the whole site.
- Added to this there will be very important economic gains from the scheme through the creation of jobs.
- Because of the type of development proposed and the organisation behind it, there can be confidence that these benefits will be delivered and that development will start quickly and follow the high standards set out in the application and the documents that support it.

In this context, and because of the substantial work that lies behind it, the application can be considered swiftly and positively.

Design Commission for Wales response

