

PLANNING STATEMENT

Land North of Elba Crescent, Swansea



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CONTENTS

1 INTRODUCTION 1

2 THE APPLICATION SITE AND SURROUNDING AREA..... 2

3 THE PROPOSED DEVELOPMENT 5

4 PLANNING POLICY FRAMEWORK 7

5 POLICY ANALYSIS & DEVELOPMENT APPRAISAL..... 19

6 CONCLUSIONS 25

1 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Hawkland Estates Ltd in support of an outline planning application for the residential development for up to 165 dwellings (including affordable housing), associated infrastructure, public open space and landscaping at land north of Elba Crescent in Swansea.
- 1.2 This statement is intended to assist Neath Port Talbot County Borough Council (NPTCBC) in its consideration of the main planning issues associated with the proposed development. It has been prepared in accordance with the guidance set out in 'Planning Policy Wales Edition 11 (February 2021)' and seeks to evaluate the proposed development against national and local planning policies.
- 1.3 This report is not a standalone document and should be read in conjunction with all other elements of the application which include:
- Design and Access Statement
 - Transport Assessment
 - Preliminary Ecological Appraisal
 - Flood Consequences Assessment and Drainage Feasibility Report
 - Environmental Noise Assessment
 - Phase 1 Desk top Study and Preliminary Risk Assessment
 - Tree Survey and Arboricultural Report
 - Pre-Application Consultation Report
- 1.4 This remainder of this Statement is structured as follows:
- Section 2: The Application Site and Surrounding Area
 - Section 3: The Proposed Development
 - Section 4: Planning policy Framework
 - Section 5: Key Planning Issues
 - Section 6: Conclusions

2 THE APPLICATION SITE AND SURROUNDING AREA

- 2.1 The application site is located approximately 4km to the east of Swansea city centre but falls within the administrative area of Neath Port Talbot County Borough Council. The site extends to approximately 4.6 hectares and lies directly to the north of Elba Crescent (grid reference: 269850, 193115).



Figure 1: Site Location

- 2.2 Residential dwellings are located immediately south of the site along Elba Crescent, beyond which is Fabian Way (A483), one of the main arterial routes into Swansea City Centre and connecting Swansea to Junction 42 of the M4. There are also residential properties adjacent to the southwest corner of the site at Baldwins Crescent.
- 2.3 To the north, east and west of the site there are a number of existing commercial/industrial premises including Blazers Caravan Retail Park, the Bay Field Hospital and the former Visteon Plant which is currently occupied by a number of different commercial occupiers including Bay Studios.
- 2.4 The site itself currently comprises a disused car park and associated access roads for the previous industrial uses as well as areas of scrub vegetation including a number of mature trees. The southern part of the site has been cleared of buildings, is level and currently vacant. A single guard house is found near the southern boundary and represents the only structure within the site.

- 2.5 An existing play area and recreational space is located to the west of the site which includes play facilities.



Figure 2: Aerial Image of the Site

- 2.6 The site is located within a highly sustainable and accessible location by walking, cycling, or public transport. The site and much of the surrounding area is flat and therefore easily accessible and navigable for pedestrians and cyclists. The site benefits from excellent cycle access, with a shared cycle/pedestrian footpath running along both sides of Fabian Way.
- 2.7 There are bus stops on Elba Crescent and Baldwins Crescent and there are bus services also available from the Bay Campus (eastbound) and Bay Campus (westbound) located to the south of the site along the A483 Fabian Way. All stops are within acceptable walking distance from the site.

Planning History

- 2.8 The site has been subject to a number of applications over the years. The principle of residential development on the site was first established in June 2005 when outline planning permission (Ref: P2004/1554) was approved for a linear residential development on the frontage part of the site.

- 2.9 The site also forms part of a larger site for which outline planning permission for a mixed-use development comprising business (B1, B2 and B8) and residential (C3) was granted in September 2011 (Ref: P2008/0514). The masterplan submitted with the application (Figure 3) shows the application site divided into two distinct sections; with the southern section (approximately 3.1 ha) proposed for residential development accessed off Elba Crescent and the northern section proposed for B1, B2 and B8 employment uses and served off the existing access in the north-western corner of the site.



Figure 3: Masterplan Submitted with Previous Application for the Site

- 2.10 Subsequent to this, consent was granted in November 2014 (Ref: P2012/581) to vary condition 31 of the 2011 permission which related to the proposed landscaping buffer area. This consent was varied further in 2018 to extend the period of approval for reserved matters thereby extending the life of the permission (Ref: P2017/0800). This consent expired in May 2019.

3 PROPOSED DEVELOPMENT

3.1 The application seeks outline planning permission for the following:

“The residential development for up to 165 dwellings (including affordable housing), associated infrastructure, public open space and landscaping at land north of Elba Crescent in Swansea”

3.2 An illustrative masterplan (Drawing No. JSL4195_102) has been prepared (Figure 4) which shows an indicative proposed layout for the site including the internal road network. The development will make provision for both market and affordable housing in a mix of house types and styles and in a form, which will reflect the character of the area and embrace good practice design. The houses will be set within a new landscape framework with easy access out onto Elba Crescent and beyond.



Figure 4: Illustrative Masterplan

3.3 The proposal includes several parcels of residential development across the site set out within simple perimeter blocks to provide frontages onto all key access routes and green spaces. Taller units, including the potential for flats, could be accommodated at several key locations providing focal point buildings.

- 3.4 New areas of public open space will be provided within the site which could contain children's play areas and spaces linked by new green corridors along main access routes throughout the site.
- 3.5 A strong landscape buffer together with an acoustic fence will be provided along the north, east and western boundaries to screen the development from surrounding employment uses. A number of existing good quality trees have been retained along the Elba Crescent frontage which provides a strong entrance character into the site.
- 3.6 New vehicular access points will be provided from Elba Crescent, along the southern boundary of the site, and new pedestrian and cycle links that will connect the site to the existing active travel network.
- 3.7 Drainage basins are proposed along the southern boundary where the site low points are located as part of a Sustainable drainage systems (SuDs) solution for the site. Swales could also be included if required within this location.
- 3.8 An indicative schedule of development is provided below.

	Amount
Total Site Area	4.61ha
Residential Development Area	3.7ha
Open Space Provision	0.8ha
Other Infrastructure	0.11
Site Density Range	40-45dph
No. of Units	150-165

4 PLANNING POLICY FRAMEWORK

Introduction

- 4.1 The following section provides an overview of the relevant policy framework relating to the application proposals. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The development plan area within which the application site is positioned is Neath Port Talbot County Borough Council.
- 4.2 In addition to the above, other key 'relevant material considerations' include, in particular, Government policy guidance contained within Planning Policy Wales (PPW) (Edition 11), Future Wales: The National Plan 2040, associated Technical Advice Notes (TANs) and the Well-Being of Future Generations (Wales) Act 2015.

National Legislation and Policy

Planning Policy Wales Edition 11 (February 2021)

- 4.3 PPW was revised in February 2021 to set out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 4.4 Figure 5 of PPW identifies five key planning principles and national sustainable placemaking outcomes as follows:
- Growing our economy in a sustainable manner;
 - Making better use of resources;
 - Facilitating accessible and healthy environments;
 - Creating and sustaining communities; and
 - Maximising environmental protection and limiting environmental impact.
- 4.5 Placemaking forms the core of PPW11 and must be embraced in development management decisions to achieve the creation of sustainable places.

- 4.6 PPW11 specifies that: *‘Good placemaking is essential to the delivery of sustainable development and achieving improvements in the well-being of communities’*. Integration is a fundamental component to ensure the right development is in the right place.
- 4.7 Figure 7 of PPW sets out how development proposals should be assessed. Stage 1 should assess the proposal against the *"Strategic and Spatial Choices"*. Stage 2 should assess the detailed impact and contribution the proposal will make to *"Active and Social Places"*, *‘Productive and Enterprising Places’* and *‘Distinctive and Natural Places’*. PPW is clear that the considerations within each of the themes will vary on a case-by-case basis, depending on the proposal concerned but, that the merits or otherwise of a proposal need to be considered in the public interest. Approaching a proposal in this manner should result in a proposal that contributes to the sustaining of or creation of sustainable places, thereby delivering on the national sustainable placemaking outcomes.
- 4.8 The plan-led system underpins the delivery of sustainable places. PPW11 outlines in paragraph 1.18 that *a plan-led approach is the most effective way to secure sustainable development through the planning system.....Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated*.
- 4.9 PPW outlines the Welsh Government’s duty under the Well-being of Future Generations (Wales Act) 2015 (WBFGA 2015) to deliver sustainable development: “Sustainable Development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals (PPW page 7).
- 4.10 Paragraph 2.10 sets out the principles of sustainable development and the approach to decision making.
- 4.11 Paragraph 3.42 of PPW11 advises that development plans must include a spatial strategy covering the lifetime of the plan which establishes a pattern of development improving social, economic, environmental and cultural well-being. A balance should be achieved between the number of homes provided and expected job opportunities. As well as ensuring all services needed for the expectant levels of growth are provided, an important consideration will be minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport. The spatial strategy should be informed by a sustainability appraisal and must form an integral part of an over-arching strategy in the development plan. Planning authorities and developers are encouraged to work together collectively to identify land in the most appropriate locations for development, which takes into account all relevant policies and is deliverable within the plan period.

- 4.12 Chapter 3 'Strategic and Spatial Choices' is centred on good design and its fundamental contribution to creating sustainable places where people want to live and work. Good design should consider the following: Environmental Sustainability, Movement, Access, Character and Community Safety.
- 4.13 Chapter 4 covers the theme of 'Active and Social Places'. A key issue for this theme is ensuring there is sufficient housing land available to meet the need for new private market and affordable housing.
- 4.14 Paragraph 4.1.50 advises that parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking. Furthermore, paragraph 4.1.51 stipulates planning authorities must support schemes which keep parking levels down, especially off-street parking.
- 4.15 Paragraph 4.2.1 requires planning authorities to understand all aspects of the housing market in their areas including the requirement, supply and delivery of housing.
- 4.16 Chapter 5 'Productive and Enterprising Places' deals with a, amongst other themes, making best use of material resources and promoting the circular economy. Placemaking embraces the inter-relationships between the built and natural environment. Choices about the use of material resources should be based on making the most appropriate and sustainable use of finite resources and promoting the principals of a circular economy.
- 4.17 Chapter 6 'Distinctive & Natural Places' states that non-statutory designations, such as Special Landscape Areas or Sites of Importance for Nature Conservation, should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. It confirms that non-statutory designations carry less weight than statutory designations although they should be given adequate protection in the development management process. It is stated, however, that such designations should not unduly restrict acceptable development.
- 4.18 Paragraph 6.2.10 states that Planning authorities should ensure that development minimises impact and provides opportunities for enhancement within areas identified as important for the ability of species to adapt and/or to move to more suitable habitats.
- 4.19 PPW states that the sustainable transport hierarchy (Figure 9) must be a key principle when considering and determining planning applications. When determining a planning application for development that has transport implications, local planning authorities should take into account the provisions of the Active Travel (Wales) Act 2013.

Future Wales: The National Plan 2040

- 4.20 Future Wales is the national development framework for Wales with development plan status. The document sets the direction for development in Wales up to 2040. The plan includes 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.
- 4.21 Future Wales provides a framework for regional planning to tackle regional inequalities and ensure that the most prosperous parts of Wales play a role in supporting their wider regions. The proposed development falls within the 'South West' region. Future Wales is a framework which will be built on by Strategic Development Plans at a regional level and Local Development Plans at local authority level. The Strategic Development Plan for the southwest region will ensure housing, economic growth, digital and transport connectivity infrastructure will be co-ordinated and planned on the basis of the whole region. A Strategic Development Plan should focus on the movement of people across the region and support an integrated approach to strategic land-use and transport planning. Strategic housing growth and services should focus on the most sustainable and accessible locations, address congestion, reduce car-based commuting and improve air quality.
- 4.22 Policy 7 sets out the national strategic approach to delivering affordable housing and ensures the focus of funding and housing policies is on driving increased provision. Planning and co-ordinating the delivery of new housing to meet identified needs is an important task for the regional planning process. Under the Welsh Government central estimates 25,600 additional homes are needed in the region until 2039 and over the initial five years (2019-20 to 2023-24) 44% of the additional homes needed should be affordable homes.
- 4.23 The Strategic Development Plan should be informed by the Swansea Bay City Deal and Economic Regeneration Strategy and should ensure that key locational decisions on housing and employment sites, key services and essential infrastructure are planned to support and benefit from the investment and projects across the region.
- 4.24 In support of Future Wales, the Well-being of Future Generations (Wales) Act 2015 influences the way we plan for new development. The Act demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.

Well-being of Future Generations Act 2015

- 4.25 The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of its decision-making processes. The objectives of the Act are as follows:

“A Prosperous Wales”

- *Promoting resource-efficient and climate change resilient settlement patterns which minimise land take and urban sprawl, especially through the reuse of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;*
- *Play an appropriate role to facilitate sustainable building standards;*
- *Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities;*
- *Support initiative and innovation and avoid placing unnecessary burdens on enterprises so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness;*

“A Resilient Wales”

- *Contributing to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems;*

“A Healthier Wales”

- *Contribute to the protection and, where possible, the improvement of people’s health and well-being as a core component of achieving the well-being goals and responding to climate change;*

“A More Equal Wales”

- *Promoting access to, inter alia, employment, shopping, education and community facilities and open and green space, maximising opportunities for community development and social welfare;*
- *Promote quality, lasting, environmentally-sound and flexible employment opportunities;*
- *Respect and encourage diversity in the local economy;*

“A Wales of Cohesive Communities”

- *Locating development so as to minimise the demand for travel, especially by private car;*
- *Fostering improvement to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity;*
- *Fostering social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that the development is accessible by means other than the private car;*

“A Wales of Vibrant Culture and Thriving Welsh Language”

- *Helping to ensure the conservation of the historic environment and cultural heritage;*
- *Positively contribute to the well-being of the Welsh language;*

“A Globally Responsive Wales”

- *Support the need to tackle the causes of climate change by moving towards a low carbon economy.”*

Technical Advice Notes

- 4.26 Technical advice notes provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. The relevant technical advice notes to this proposed development are as follows;

[TAN 5: Nature Conservation and Planning \(2009\)](#)

- 4.27 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation in particular on :

- The key principles of positive planning for nature conservation;
- Nature conservation and Local Development Plans;
- Nature conservation in development management procedures;
- Development affecting protected internationally and nationally designated sites and habitats; and
- Development affecting protected and priority habitats and species.

[Technical Advice Note 11: Noise \(1997\)](#)

- 4.28 Guidance on noise relating to planning for new developments in Wales is given in TAN 11. The TAN specifically seeks to ensure than noise generating development does not cause an unacceptable degree of disturbance on existing uses, and that noise-sensitive development is not located in areas which are, or are expected to become, subject to unacceptably high levels of noise.

[Technical Advice Note 12: Design \(2016\)](#)

- 4.29 Technical Advice Note (TAN) provides advice on design considerations and, in relation to housing design, it states that local planning policies and guidance should aim to:
- create places with the needs of people in mind, which are distinctive and respect local character;
 - promote layouts and design features which encourage community safety and accessibility;
 - focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
 - avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
 - promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
 - secures the most efficient use of land including appropriate densities; and
 - consider and balance potential conflicts between these criteria.

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

- 4.30 TAN 15 provides technical guidance to supplement the policy set out within Planning Policy Wales in relation to development and flooding. The guidance relates to sustainability principles and provides a framework to allow risks arising from river flooding, coastal flooding and additional run off from developments to be assessed.
- 4.31 In relation to flood risk, TAN 15 indicates that the Assembly has a duty to ensure that development is sustainable and does not create problems for future generations. Managing flooding has an important role to ensure sustainable development by: guiding developments to locations with little or no risk from river, tidal or coastal flooding, managing consequences of flooding where developments can be justified and making provision for climate change.
- 4.32 TAN 15 confirms that each planning authority in Wales must prepare a Development Plan for its area. The development plans provide locational guidance for development, detailed site-specific policies, and identification of proposals for development. Catchment Flood Management Plans aim to take a holistic approach to flood management at a catchment scale and can provide guidance on managing risk to future developments. The information provided in local development plans and catchment flood management plans will aid with the application of the Justification Test.

Technical Advice Note 18: Transport (2007)

- 4.33 TAN 18 highlights the role that integrating land use planning and development of transport infrastructure can play in addressing the environmental aspects of sustainable development. Paragraph 2.3 sets out how integration can help Welsh Government achieve wider sustainable development policy objectives through a number of measures:
- Ensuring new development is located where there is, or will be, good access by public transport, walking and cycling, to minimise the need for travel;
 - Managing parking provision – using maximum car parking standards as a form of demand management;
 - Encouraging the location of development near other related uses to encourage multi-purpose trips;
 - Promoting cycling and walking; and
 - Supporting the provision of high quality, inclusive public transport.
- 4.34 Section 7 of TAN 18 is concerned with public transport. Paragraph 7.1 acknowledges that new and improved public transport provision has the potential to provide alternatives to private vehicle use and to change existing travel demands. It states further that where enhanced public transport services or infrastructure is necessary to serve new development, but provision on a commercial basis is not viable, a developer contribution may be appropriate.

Local Planning Policy

- 4.35 Section 38 (6) of the Planning and Compulsory Purchase Act 20014 requires that planning applications must be determined in accordance with the plan unless material considerations indicate otherwise. The Development Plan is the Neath Port Talbot Local Development Plan (LDP) which was adopted in January 2016 and covers the period 2011 to 2026.

The Neath Port Talbot Local Development Plan 2011-2026 (January 2016)

- 4.36 The LDP Proposals Map (Figure 5) shows that application site is allocated for housing under **Policy H1** (Site Ref: H1/LB/3) with an estimated number of units given as 50. The LDP provides likely phasing for development of the site to be implemented between 2020-2023.

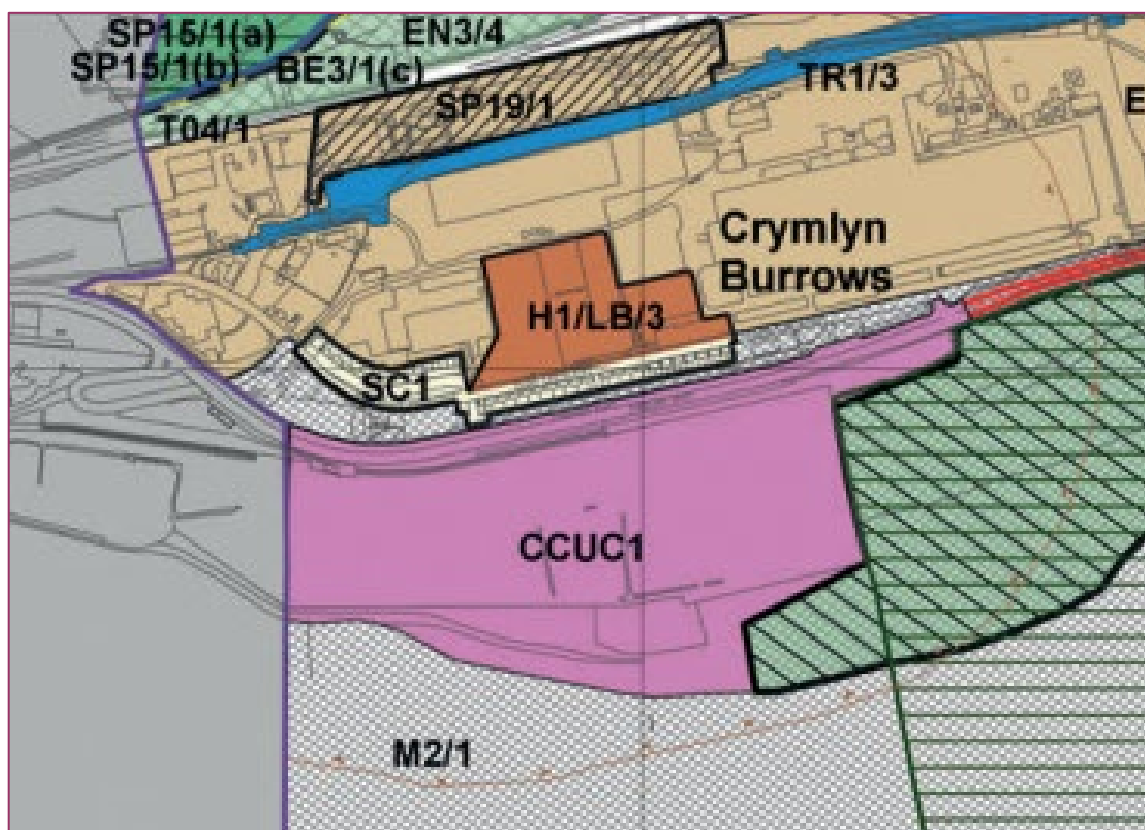


Figure 5: Extract from LDP Proposals Map

- 4.37 The LDP sets out the opportunities and constraints for the site including a requirement for access to be off Elba Crescent, ecological and reptile survey requirements, noise/acoustic assessment, 20% on-site affordable housing provision, contamination assessment and remediation scheme and a financial contribution for open space provision.

- 4.38 The application site is also shown on the Proposals Map as lying within the settlement limit. **Policy SC1 (Settlement Limits)** advises that development within settlement limits that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle. The supporting text to this policy explains that settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside (para. 3.0.13).
- 4.39 Other policies of relevance to the application proposal are set out below.
- 4.40 **Policy SP1 (Climate Change)** advises that the causes and consequences of climate change will be addressed by implementing a range of measures. These include enhancing the efficiency and sustainability of the County Borough's settlements through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns. Also dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities. In relation to the consequences of climate change the policy advises that likely increased food risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere.
- 4.41 **Policy SP3 (Sustainable Communities)** explains that the delivery of sustainable, healthy and cohesive communities and the conservation of the countryside will be promoted by the identification of a settlement hierarchy that reflects the role and function of settlements. New development will therefore be steered towards the more sustainable locations of the county. **Policy SC1 (Settlement Limits)** and **Policy SC2 (Protection of Existing Community Facilities)** fall within Policy SP3.
- 4.42 **Policy SP4 (Infrastructure)** requires developments to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community. Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.
- 4.43 **Policy SP5 (Development in the Coastal Corridor Strategy Area)** advises that sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment.

- 4.44 **Policy SP10 (Open Space)** requires that provision will be made to ensure that all residents have access to adequate open space by ensuring that new development addresses local needs and retaining and protecting existing open space.
- 4.45 **Policy SP15 (Biodiversity and Geodiversity)** requires Important habitats, species and sites of geological interest to be protected, conserved, enhanced and managed. **Policies EN6 (Important Biodiversity and Geodiversity Sites)** and **EN7 (Important Natural Features)** fall under Policy SP15.
- 4.46 **Policy SP16 (Environmental Protection)** advises that air, water and ground quality and the environment generally will be protected and where feasible improved.
- 4.47 **Policy SP20 (Transport Network)** states that the transport system and infrastructure will be developed in a safe, efficient and sustainable manner.
- 4.48 **Policy H1 (Housing Sites)** identifies land for residential development. As mentioned above, land north of Elba Crescent is allocated for 50 dwellings (H1/LB/3).
- 4.49 Under the provisions of the LDP, **Policy AH1 (Affordable Housing)** requires that all new residential development, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. The Council's Affordable Housing SPG provides the sub area affordable housing provision requirements. The application site lies within the 'Coedfranc West' sub area in the Neath LDP spatial area. This area has a 25% affordable housing requirement.
- 4.50 **Policy TR2 (Design and Access of New Development)** advises that development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:
1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
 4. Transport assessments and travel plans are provided for developments that are likely to create significant traffic generation.
- 4.51 The supporting text explains that new development will be required to demonstrate that it will have no adverse effect on the existing highway network and traffic or congestion will

not be increased to unacceptable levels. The LDP goes on to advise in the interests of creating more sustainable communities new development proposals should be accessible by a variety of means, not just the private car. Walking, cycling and public transport play an important role in reducing the number of shorter journeys taken by car and contribute towards the Plan's aim to provide a sustainable and more integrated transport network. Where appropriate, new developments will be required to demonstrate how they connect to existing, adjacent settlements.

4.52 **Policy BE1 (Design)** requires that all development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. The Policy further advises that proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;
4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;
5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
8. It uses resources, including land and energy, as efficiently as possible through:
 - a. Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;
 - b. The layout and form of the development does not preclude the reasonable use of other adjacent land;
 - c. Developing brownfield land in preference to greenfield land where possible;

- d. Minimising building exposure while maximising solar gain.
- 9. Its drainage systems are designed to limit surface water run-of and food risk and prevent pollution;
- 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.

5 POLICY ANALYSIS AND DEVELOPMENT APPRAISAL

5.1 Having regard to the nature of the development proposals it is considered that the issues of relevance in the consideration of this application are as follows:

- The suitability of the site for residential development
- Design Strategy
- The impact on the local highway network
- Impact on ecology and biodiversity
- Flood Risk

Suitability of the Site for Residential

- 5.2 The application site comprises previously developed land which falls within the defined settlement limits. Also, as explained earlier, the site is allocated for residential development in the adopted LDP, the principle of which would have been tested and consulted on through the LDP preparation process. Added to this the numerous residential consents granted for the site over the years, with the most recent permission expiring in May 2019, it can be concluded that the principle of residential development on this site is firmly established.
- 5.3 The application site offers the opportunity to transform a currently under-utilised brownfield landscape into an extension to an existing residential area in order to create a new, sustainable neighbourhood for the area of Crymlyn Burrows at Elba Crescent.
- 5.4 This would deliver a mix of new homes to suit a range of needs as well as new, high quality green spaces for people to enjoy. New pedestrian and cycle links will help integrate the site into the surrounding active travel network providing direct links to both Swansea, Port Talbot and beyond.
- 5.5 The development of the site would embrace good design and placemaking principles to create an accessible, sustainable, high-quality place where people want to live.
- 5.6 Developing the site would benefit the wider local community through the provision of a variety of house types and tenures, new recreational green spaces to promote health and wellbeing and the creation of local job opportunities during the construction phase. It is therefore considered that the site is entirely suitable for residential development and is in accordance with Policies H1, SC1 and AH1 of the adopted LDP.

Design Strategy

- 5.7 Details on the design of the proposed development including the design evolution is provided in the accompanying Design and Access Statement (DAS). The DAS explains how the development of the site presents an opportunity to contribute to the regeneration of the area by providing much needed new high-quality housing to complement the existing development within the area. It goes on to explain that the masterplan has been developed to address the identified constraints and maximise the opportunities. It sets out the aims and objectives for the development proposals as being:
- To provide a mix of high-quality new homes (including affordable housing) where people want to live.
 - To provide a safe and secure environment for users of the site with well overlooked streets and spaces and a clear legible site layout.
 - To ensure good connections into and out of the site to enable ease of movement and links into the wider highway network.
 - To produce a high quality environment with good public realm and amenity green spaces.
 - To integrate a robust landscape framework to help screen the development from the surrounding land uses, whilst providing attractive and high quality open spaces for the enjoyment of residents and the local community.
 - For the built form and architectural style to have due regard for the local character and reflect the settlement form and layout that are typical of the surrounding area.
 - To use materials that reflect a commitment to quality and sustainability.
 - To enhance Elba Crescent by creating a development that makes the most efficient use of this brownfield site to meet local housing needs and requirements.
- 5.8 The application site has the potential to be transformed from a derelict former industrial car park into a desirable, high quality and inspiring place to live. The challenge in redeveloping the site is how to accommodate new development on this brownfield land, whilst improving and enhancing the setting of the area, complementing the existing properties along Elba Crescent.
- 5.9 The overall aim of the project is to deliver a sustainable and integrated development, set within a natural landscape framework that shields it from the neighbouring industrial uses to the north, east and west but connects to the residential area to the south.
- 5.10 The DAS explains that several key design principles have been established which include:

- Placemaking - Creating a sense of place is vital to the success of a new development. The character of the surrounding area should be used to create a development that is complimentary to the existing environment but also one that has its own special character.
- Environment - A successful development is one that harnesses the existing environment of the site and context and utilises these features to add value to the scheme.
- Movement and Access - A successful development requires the creation of a well-defined network of streets and spaces that provide a legible, safe, and permeable environment. Well-designed links and connections into the existing movement network will provide direct access to local services within the surrounding area.

- 5.11 Utilising these key principles, the DAS explains that the Concept Masterplan prepared for the site is based on legibility, permeability and connectivity, integration of existing landscape features into a greenspace network, a positive and pro-active response to the sites constraints and the creation of a new neighbourhood character to support the existing dwellings located on Elba Crescent.
- 5.12 The Concept Masterplan has been informed by an assessment of a number of environmental factors for the site including landscape, ecology, flood risk and drainage and site access requirements.
- 5.13 Having regard to this information, the concept masterplan demonstrates how the site could accommodate approximately 4.6 ha of residential development, which if applying an average density of 45 dwellings per hectare, could provide a mix of approximately 165 new homes.
- 5.14 The concept masterplan also demonstrates how new public open green space, including play and recreational facilities, could be incorporated into the scheme as well as an appropriate Sustainable Urban Drainage solution (SuDs).
- 5.15 In light of the above it is considered that the application proposals fully accord with LDP Policies SP3 (Sustainable Communities) and BE1 (Design).

Impact on the Local Highway Network

- 5.16 A Transport Assessment (TA) has been undertaken by Corun Associates to support the planning application. The purpose of the TA is to examine the highway and transportation issues associated with a proposed development of circa 165 dwellings.

- 5.17 The TA confirms that the site is located in close proximity to a wide range of local facilities that will be used by potential occupants of the proposed development on a daily basis, and is highly accessible by non-car modes of transport. The site is therefore compliant with transport planning policy at both local and national level.
- 5.18 Access will be taken from the existing site access point, with the existing priority junction being modified to provide a more appropriate residential geometry (i.e., a 5.5m wide access road with 6.0m radii kerbs on entry and exit). Footways of 2.0m in width will be provided through the development site, which will connect directly into the existing footway provision along the northern edge of Elba Crescent.
- 5.19 Car and cycle parking at the site will be provided in accordance with the standards set out in Neath Port Talbot County Borough Council guidance.
- 5.20 The TA advises that the development of the site is predicted to generate approximately 75 and 73 total two-way vehicle trips over the traditional AM and PM highway peak hours of 08:00 to 09:00, and 17:00 to 18:00 respectively. Between the weekday 12-hour period of 07:00 to 19:00, the proposed development would be anticipated to generate a total of 644 total two-way vehicle trips.
- 5.21 The junction capacity assessments have identified that both the proposed new site access junction, and the A483 signalised junctions tested would be anticipated to operate well within capacity during all 'With Development' modelled scenarios for both a 2022 and 2027 forecast year. The proposed development, therefore, is not anticipated to cause any significant capacity issues on the local highway network.
- 5.22 A review of the accident record has identified no apparent existing highway safety concerns in the vicinity of the site. The proposed development is not expected to have an adverse impact on this existing highway safety record.
- 5.23 The TA concludes that there are no reasons, in highway and transportation terms, why the proposed development should not receive consent. I concur with this view and consider the application proposals to be in accordance with LDP Policies SP20 (Transport Networks) and TR2 (Design and Access of New Development).

Impact on Ecology and Biodiversity

- 524 This application is supported by a Preliminary Ecological Appraisal (PEA) Report which presents the findings of an ecological appraisal of the site and an assessment of the potential ecological considerations and constraints on its future development for residential.

- 5.25 Desk based consultation confirmed the site holds no statutory or non-statutory designations for nature conservation however, the Crymlyn Bog SSSI, SAC, NNR and RAMSAR site and the Crymlyn Burrows SSSI can both be found within a 1km radius of the site. Neither of these statutory sites were considered of ecological relevance to the proposal due to their designating features which mostly consist of habitats and species that are not present at the application site and very unlikely to be affected by the development. The desk study also revealed the location of 3no. SINC's within a 1km radius of the site but these were also considered to be of little relevance to the site for similar reasons as mentioned above.
- 5.26 The desk study returned several records for protected fauna and flora within 1km of the site (extended to 2km for bats). This included foraging/commuting records for at least 6no. different bat species although there are no known roosts within a 2km radius of the site. Other mammalian records identified in the desk study include several sightings of Otter and Water Vole associated with the Tennant Canal, as well as the location of a single known historic Badger sett approximately 1000m north-east of the site. Herpetofauna (reptile and amphibian) records included those for Common Lizard, Grass Snake, Common Frog, Common Toad and Palmate Newt, while the desk study also returned an extensive list of priority and protected bird and invertebrate species found within 1km of the site, the majority of which were associated with the designated sites.
- 5.27 An Extended Phase 1 Habitat survey undertaken in October 2021 identified a range of habitats present at the site, most of which are typically associated with colonised brownfield land. Large parts of the site are still covered by existing hardstanding, with parcels of dense scrub, grassland, Bracken and early colonising vegetation also present. The habitats found at the site were considered suitable of supporting commuting/foraging bats, nesting birds and reptiles. A derelict guard house found in the south of the site was also considered to have a low potential to support roosting bats. No non-native invasive plant species listed under the Wildlife & Countryside Act 1981 (as amended) were found at the site.
- 5.28 Further survey work will be undertaken to inform any specific mitigation or licensing requirements with regards to bats and reptiles. Any future vegetation works at the site, such as tree and scrub removal, would also be subject to seasonal constraints i.e. outside of the bird nesting season to minimise the risks to any nesting birds that may be present.
- 5.29 The PEA report concludes that development at the site presents opportunities for local biodiversity enhancement such as the inclusion of bat and bird boxes onto new buildings, and retained trees; the creation of gaps at the bottom of any garden and boundary fencing to allow continued connectivity through the site for Hedgehog and other small mammals, the use of native species in any soft landscaping and the management of any retained habitat features.

- 5.30 Based on the ecological survey work undertaken to date there is nothing to suggest that the proposed development will lead to a significant impact on any known protected species or ecological features. It is considered that with careful design considerations, as evidenced by the illustrative masterplan, and appropriate mitigation measures as described above the development proposals will be in accordance with LDP Policy SP15 (Biodiversity and Geodiversity).

Flood Risk and Drainage

- 5.31 The application is supported by a Flood Consequences Assessment (FCA) the aim of which is to outline the potential for the site to be impacted by flooding, the impacts of the proposed development on flooding in the vicinity of the site, and the proposed measures which could be incorporated into the development to mitigate the identified risk.
- 5.32 The FCA confirms the following:
- The Development Advice Map indicates that the site is located within Zone A. Zone A is described in TAN15 as those areas “considered to be at little or no risk of fluvial or coastal/tidal flooding”
 - The NRW Flood Risk Maps shows that the site is not at risk of fluvial or tidal/coastal flooding.
 - Risk associated with sewer flooding, surface water flooding and groundwater flooding is considered to be low.
 - The surface water flood map indicates that the site is predominantly at negligible risk of surface water flooding corresponding with an annual probability of flooding that is less than 1 in 1,000 (0.1%).

- 5.33 The FCA concludes that the application site is not considered to be at a significant risk of flooding from any of the sources assessed. Development at this location would be considered to be safe from a flood risk perspective and, following the incorporation of an appropriate drainage strategy, would not result in an increase in flood risk off-site. Based on this it is considered that the application proposals are in accordance with LDP Policy SP1 (Climate Change).

Noise

- 5.34 A noise assessment has been undertaken by Hunter Acoustics in support of the application. This confirms that the erection of a 3m high close board acoustic fence, together with the 10m wide landscaping buffer and mitigating measures such as up-rated acoustic glazing and ventilation on selected facades would be sufficient to protect the proposed dwellings from noise levels generated from the adjacent existing and proposed industrial uses.

6 CONCLUSIONS

- 6.1 This Planning Statement has been prepared in support of an outline planning application for the development of up to 165 dwellings (including affordable housing), associated infrastructure, public open space and landscaping at land north of Elba Crescent, Swansea. Despite its proximity to Swansea City Centre, the proposed development site falls within the Local Authority area of Neath Port Talbot County Borough Council.
- 6.2 The basis of the applicant's case is that the site is suitable for residential use being a brownfield, underused site which is well related to the existing settlement pattern and would improve the stock and range of local housing.
- 6.3 The site is easily accessible by public transport, cycling and walking and is well located in terms of access to the primary road network.
- 6.4 The site's redevelopment would also comprehensively address the remediation of this partly derelict site and offers opportunities for significant environmental and biodiversity enhancements. This would result in a betterment to the appearance and character of the area thereby having a positive impact on the residential amenity of existing residents.
- 6.5 The proposal therefore makes effective and appropriate use of a brownfield site land adjacent to an established residential area and should be welcomed for the benefits it will bring which include its contribution towards much need housing in the local area including affordable housing.
- 6.6 Finally, it is considered that the proposed development is in accordance with the Well Being of Future Generations (Wales) Act 2015 sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.