

**REPORT ON CONSULTATION UNDERTAKEN ON DRAFT Supplementary Planning Guidance  
Placemaking Guidance for Infill and Backland Development**

**Summary of Findings from Public and Stakeholder Consultation Exercise**

**City & County of Swansea Council  
October 2021**

REPORT ON CONSULTATION UNDERTAKEN ON DRAFT SPG – PLACEMAKING GUIDANCE FOR INFILL AND BACKLAND DEVELOPMENT, 2021

Summary of Findings from Public and Stakeholder Consultation Exercise

Introduction

- 1.1 On February 2021, the City & County of Swansea Council Planning Committee approved draft versions of the updated Placemaking Guidance for Residential Development, Placemaking Guidance for Infill and Backland Development and Placemaking Guidance for Householder Development (SPG) for the purpose of public and stakeholder consultation.
- 1.2 The three draft Placemaking Guidance documents were subject to a consultation and engagement process for approximately 12 weeks, from the 14<sup>th</sup> June 2021 and until the 13<sup>th</sup> September 2021.
- 1.3 The consultation involved a wide range of awareness raising and engagement activities, including:
- Social media postings notices before and during the consultation
  - A specific page was created for the consultation on the Council Web Site, providing a weblink to the draft documents, non-technical summaries and a link to the comment form
  - Notification emails were sent to a range of stakeholders, including Councillors
  - Remote briefings to stakeholder groups via Microsoft Teams presentations
  - Publication of recorded video presentations on the Council's website
  - Following the lifting of all Covid restrictions, it was possible to attend two Summer of Play events in Trallwyn and Gorseinon.
- 1.4 The consultation included a number of questions to help respondents structure responses as follows:
- What things are important to include in new places to live in Swansea?
  - What existing places should we look at for inspiration?
  - Is the draft document easy to understand?
  - Comments on the changes that have been made to the draft documents, including a greater emphasis on placemaking, sustainable urban drainage and green infrastructure
- 1.5 The engagement with children and families included two activities:
- Design your house of the future
  - Vote for your favourite street/ park and house
- 1.6 The respondents included:
- Informal conversations with over 25 children and their families at two play sessions in different parts of Swansea (note no personal details were recorded)
  - Webinar with 17 attendees (representing Housing Associations, Volume House Builders, Regional House Builders and Police) including question and answer sessions - The recorded webinars were watched a total of 46 times
  - Targeted communications with the development industry – giving rise to 13 written representations (representing Housing Associations, Volume House Builders, Regional House Builders, planning agents, designers and public organisations) which have been broken down into over 90 separate comments.
- 1.7 The comments primarily related to the Placemaking Guidance for Residential Development however many were also relevant to the draft Placemaking Guidance for Infill and Backland Developments.
- 1.8 The full comments made by respondents that are relevant to the draft Placemaking Guidance for Infill and Backland Development has been grouped into issues or themes and the consideration of the comments plus the resulting changes where appropriate are set out on the following pages.

The respondents have been allocated number references as follows:

No	Name	Role
1	Barratt & David Wilson Homes	Private Company
2	Canal and River Trust	Public Sector Organisation
3	Crompton Land & Development Ltd	Private Company
4	Comments noted during stakeholder webinar	Webinar with question and answer session (17 attendees representing Housing Associations, Volume House Builders, Regional House Builders and Police)
5	Geraint John Planning on behalf of Coastal Housing Association / Pennant Homes	Private company/ Housing Association
6	Life Property Group	Private Company
7	Mike Harvey (Designing Out Crime Officer)	Public Sector Organisation
8	Natural Resources Wales	Public Sector Organisation
9	Pad Design Ltd	Private Company
10	Pennard Community Council	Community Council
11	Pobl Group	Registered Social Landlord / Housing Association
12	Informal conversations with children and families during play session engagement	
13	St Modwen Homes	Private Company
14	Urban Foundry	Community Regeneration Company
15	Persimmon Homes West Wales	Private Company

## Engaging Children and Families

As well as consulting stakeholders such as developers and designers it is important to understand the views and aspirations of the families and children who will live in the new places being created.

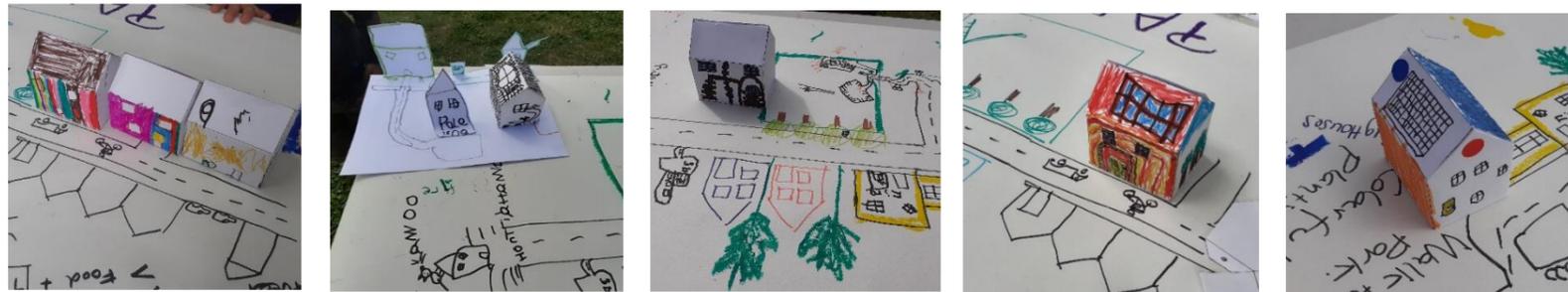
With the removal of all Covid-19 restrictions in the summer of 2021 it was possible to attend two Council ‘ Summer of Play’ events in Trallwyn and Gorseinon on 18<sup>th</sup> August 2021. The attendance at these events gave an opportunity to discuss and understand the views of families and children by the following means:

- Design your future home – this was a colour and make exercise to design their future home onto a blank box.
- Dot voting for your favourite street/ house/ park.

The results of this engagement is presented in the following paragraphs alongside the other stake holders.

The images presented for the dot voting and percentages are shown right.

A selection of the houses of the future designed by the children are shown below.



A selection of homes of the future designed by children showing a preference for lots of windows and use of colour

### The findings from the conversations, house making and dot voting with children and families was as follows:

- **New street should have trees and greenery and not be full of cars.** The dot voting indicated a clear preference (78%) for streets with planting and trees. This was a strong message from children and their parents/ carers which aligns with the national emphasis on green infrastructure and for designing streets as places not dominated by vehicles.
- **New homes should be close to schools, shops, parks and nature.** This was a strong message from the conversations with children and their parents/ carers about the benefits of being able to walk to community facilities with benefits for health, well-being and sense of community. This aligns with the national emphasis on active travel and there was a clear view that having to drive everywhere was not a good thing.
- **New homes should have larger windows and be colourful.** The houses the children designed and dot voting for their favourite homes indicated a preference (60%) for more contemporary homes with larger windows and external terraces. This was a strong message from the adults of the future of how they thought new homes should be designed to live in. Larger windows for natural light and connection to the outdoors are key aspects contributing to well-being. Colour is also important for a sense of variety and personalisation.
- **Play should incorporate natural features.** The dot voting showed a preference for play areas with naturalistic features (50%) followed by active spaces such as pump tracks (33%) and the traditional play area was least favoured (17%). This is a message from young people that they favour integration of nature and naturalistic features into play and that they also want opportunities to be active in a more expansive way.



Results of dot voting by children for their favourite park, favourite street and favourite house

The full comments made by respondents that are relevant to the draft Placemaking Guidance for Infill and Backland Development has been grouped into issues or themes and the consideration of the comments plus the resulting changes where appropriate are set out on the following pages.

**What existing places should we look at for inspiration?**

Respondent	Summary of comments	Council response	Recommended change
11	<p>There are existing places (recently built developments) that provide examples of good placemaking practice, and there are existing places (generally historic townscapes) that provide inspiration. These places can be found in all parts of the World, but for the purpose of this Placemaking SPG and this question, one assumes that examples in the United Kingdom, Wales or even Swansea are being sought.</p> <p>In Swansea, the best places are found in parts of the city such as the Uplands and the Mumbles. These places are inherently walkable, possess a rich architectural character and have a good mix of uses. The density of these parts of Swansea are relatively high, cars are parked on street and separation distances are quite low. Along with good green infrastructure and exploitation of natural features (such as the shorefront) these places provide inspiration and examples of how a flexible attitude towards parking standards, highway design can lead to better placemaking.</p> <p>There are also the tight knit villages of Gower such as Port Eynon, Bishopston, Reynoldston and Llanrhidian which can provide inspiration for new places to live. These villages exhibit historic character, streets created organically primarily for people, informal greenspaces, and a wealth of details, all of which can inspire the design of new places to live.</p>	<p>This response helpfully points out that many existing areas of Swansea possess positive placemaking qualities and have been successful places to live for over 100 years. This is touched upon in the document but there is an opportunity to increase the emphasis on learning from existing places.</p>	<p>Expand introduction text paragraph 1.8 to reference existing successful sustainable places as follows:</p> <p><i><u>There are a diverse range of established places in Swansea that have achieved exactly this aim. These vary in character from the vibrant, dense urban areas of Uplands and Mumbles, to the many beautiful Gower Villages. The placemaking approach is not one that seeks to reinvent the wheel, but instead aims to guide us to understanding what makes existing places ‘work best’ for the people that live and spend time there, and to use these attributes as precedents for 21<sup>st</sup> Century Living.</u></i></p> <p><u>Add image of Uplands after paragraph 1.8 to make this point.</u></p>

**Is the draft document easy to understand?**

Respondent	Summary of comments	Council response	Recommended change
10	<p>General labels on maps should be larger and maps should be clearer</p>	<p>All figure text and annotations are legible, plus as an electronic pdf document the user can view on a larger screen and/or zoom if necessary.</p>	<p>No change</p>

<p>3</p>	<p>Propose the inclusion of the Welsh Government - “<b>Building Better Places</b>” (July 2020) policy document be included and referenced in this section.</p>	<p>Building Better Places, published by Welsh Government in summer of 2020, emphasises the importance of placemaking even more so as part of the post-covid recovery. This is very clear in the Ministerial Foreword by Julie James Minister for Climate Change which emphasises placemaking and planning.</p>	<p>Update section 1 to include summary of relevant current Welsh Government Guidance such as ‘Building Better Places’ after Planning Policy Wales (1.10) as follows:</p>
<p>6</p>	<p>It is important to include Welsh Government’s <b>Building Better Places</b> policy document (issued July 2020).</p>		<p><b><u>Building Better Places: Placemaking and the Covid-19 Recovery, July 2020.</u></b></p> <p><u>2.12 This Welsh Government document supplements Planning Policy Wales and increases the emphasis on placemaking and green infrastructure. The following extracts from the document highlight how planning decision making needs to attribute significant importance to these issues, and identifies the potential adverse impacts of not ensuring placemaking principles are adhered to:</u></p> <p><u>“We have all spent more time in our neighbourhoods during the weeks of lockdown and we can all appreciate the difference between having a quality environment to live, work and relax in and how being cut-off from our friends and family can mean that a poor environment, with no or limited access to local goods, services and green spaces can have a severely detrimental impact on our mental and physical health and well-being, as well as our ability to protect our livelihoods.</u></p> <p><u>Now, more than ever, we need to think about places and placemaking. This will be our core value in the work we take forward to bring about recovery in Wales. The regenerative action we take at all levels will be driven by integrated thinking and not short-term expedience which can have negative longer term consequences.”</u></p> <p><u>Foreword from the Minister Julie James MS (p2)</u></p> <p><u>“With exercise and social contact so vital to our health and well-being, the pandemic has reinforced the need for well-designed, people orientated streets. This forms the basis of the ‘active and social streets’ policy in PPW, which is supported by Manual for Streets6 and its companion guide Manual for Streets 27. PPW is clear that the design of streets should be based on urban design principles and not the conventional engineering-led approach in the now superseded Design Bulletin 32.</u></p> <p><u>Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets. The Welsh Government will support decisions of this nature to help create better places.”</u></p> <p style="text-align: right;"><u>(Building Better Places p17)</u></p>

3	You should include and reference the new Draft CCS Street Design Guide.	The emerging Street Adoption Design Guide is following on from the Placemaking Guidance for Residential Developments; this sets out a process for providing and adopting 'non-standard' place led streets that are safe, accessible, maintainable, green and integrate to quality of life.	Update document in section 1 to include summary and link to Street Adoption Design Guide as follows:
6	The new draft CCS Street Design Guide should be included.	It is not appropriate to reference this in paragraph 2.14 which summarises movement policy at the national level but the reference can be added to the 'Local Policy and Guidance' section after paragraph 2.46	<p><b>Complementary SPG and Other Guidance</b></p> <p><u>1.29 As well as adopted SPG, there are other Council Guidance documents that may be relevant to guide proposals. Of particular note is the Council's <b>Street Design Guide</b>, which sets out detailed standards to ensure safe and accessible place-led streets are delivered, as advocated by PPW, TAN 18, the Swansea LDP and Manual for Streets. This document is not SPG and is instead a user guide for developers that will be updated from time to time as necessary. It sets out the key principles and provides various examples to illustrate how placemaking can be successfully integrated into the design of streets at various scales. The Streets Design Guide can be found on the Council website.</u></p>
6	In Paragraph 1.13 (Bullet Point 6) entitled Plot Based Development, we are pleased to note the statement: "to create varied and interesting places and to open up the market to small and local builders to provide the opportunities for small plots". However, under current planning policy, there is no incentive to encourage larger developers to sub-divide their sites to sell for the development of small plots or self-build projects. A way forward may be to relax the affordable housing requirements and to apply other S.106 obligations for these plots to enable landowners and developers to be motivated to propose opportunities for the development of smaller plots.	Paragraph 2.20 is a summary of national policy document Future Wales and the SPG cannot change or introduce new policy.  The Policy requirements for affordable housing are set out in LDP policy HC 2 sets out the Affordable Housing strategy and this SPG cannot amend this requirement however the s106 contributions can be negotiated on a site by site basis via the open book 'Development Viability Model' process where necessary to ensure a balance of delivery and necessary contributions to community infrastructure.	No change
3	Para. 1.13 – Bullet Point 6 – <b>Plot Based Development</b> – We support the recognition " <b>to create varied and interesting places and to open up the market to small and local builders to provide the opportunities for small plots</b> ". However, current planning policies do not provide any incentives to larger developers to facilitate the sub division of their sites for selling off small plots / self build. Perhaps therefore, the relaxation of affordable housing requirements and other S.106 obligations should be applied on such plots, so that the main landowner / developer can be incentivised to bring forward such small plot opportunities to the market.		
15	Generally supportive of the contents of the draft SPG however would like to ensure the document allows for an element of flexibility for future development sites if required.	All SPG is guidance that expands on Development Plan policy. The document is therefore not a 'set of rules' and can be applied flexibly as evidenced by the positive dialogue on a wide variety of sites using the current 2014 residential design guide.	Amend paragraph 1.4 as follows:  <u>The Guidance outlines the placemaking issues which need to be considered on a 'case by case' basis. The guidance is not a set of rules but rather a set of principles which can be addressed in many different ways. The overarching purpose</u>
13	Whilst the majority of the SPG is focused on the principles of placemaking, some of the prescriptive content could slow down		

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	the application process and encourage subjective decision making based on personal preference instead of focusing on the parameters and principles of good placemaking and the issues which developments need to consider rather than prescribing the solution and stifling innovation and design freedom.	Placemaking is not subjective and certainly is not personal preference. Placemaking is based upon a clear and holistic approach. Whilst there may be a number of ways of addressing placemaking objectives such as the form of 'active frontage' and clearly there will be unacceptable responses such as homes backing onto streets. Paragraph 5.3 currently notes that the guidance modules are not a set of rules but rather a set of principles which can be addressed in many different ways.  The Welsh Government post covid recovery document 'Building Better Places' emphasises the increased importance of placemaking in the Ministerial Forward:  <i>"Now, more than ever, we need to think about places and placemaking. This will be our core value in the work we take forward to bring about recovery in Wales. The regenerative action we take at all levels will be driven by integrated thinking and not short-term expedience which can have negative longer term consequences."</i>	<u>is to facilitate the Placemaking aspirations of the Council and deliver the key objective of significantly raising standards of design across the County.</u>
6	We believe it is in the interest of the Council to support rather than introduce regulatory change within the development industry to enable us to deliver much-needed housing, particularly in light of the challenges our sector has experienced due to the global pandemic including material and labour shortages.		
13	The SPG needs to be careful so as to avoid it being interpreted by the decision maker that any adverse impact in relation to placemaking is an absolute constraint justifying refusal and clarify that exceptions to this will be allowed where it can be demonstrated that the development is in the public interest and that it can be evidenced that efforts have been made to reduce any adverse impact.		
13	The SPG ensures that placemaking is considered as a key influence in shaping proposals instead of it being an afterthought and so the clarification it provides through its consistent and uniform approach to placemaking that should engender through the planning system is welcomed.  However, there needs to be an element of flexibility within the SPG as a one size fits all approach does not work in terms of placemaking. In addition, the level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place with a collaborative approach taken at the pre-application stage to ensure the key placemaking stakeholders are involved from the outset.		

**Comments on the changes that have been made to the draft documents, including a greater emphasis on placemaking, sustainable urban drainage and green infrastructure**

<b>Respondent</b>	<b>Summary of comments</b>	<b>Council response</b>	<b>Recommended change</b>
11	The greater emphasis on placemaking, sustainable urban drainage and green infrastructure is entirely appropriate and aligns the SPG with all the best practice being promoted by the Welsh Government and the Design Commission for Wales.  The Guidance modules section is clear and helpful. It also provides principles as opposed to rules allowing for some flexibility according to site conditions and other factors. The draft document includes most of what it should in terms of an explanation of the importance of Placemaking and the philosophy behind this; setting out the policy background; and providing clear and easy to understand Principles and Key Questions for applicants.	Support for the document is noted and this respondent has commented how the guidance modules set out principles as opposed to rules and recognises that this can be applied flexibly.	No change

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8	We welcome the references to biodiversity enhancements and green infrastructure throughout the documents however, due to the nature/general focus of the SPGs we wouldn't have any further comments.	Support for the inclusion of biodiversity and green infrastructure is noted.	No change
11	The idea of a Planning Performance Agreement (PPA) sounds good – this needs to be explained in the SPG document. Is this an agreement between developer/applicant on what was agreed during the pre-application stage? Will it include a commitment from the highway authority to adhere to the agreement and the planning consented scheme when the highway adoption stage is reached?	Paragraphs 2.13-2.16 outline the pre-application process but do not mention Planning Performance Agreements.	Add a new paragraph after 2.15 as follows: <u>2.16 There is an option to enter into a Planning Performance Agreement (PPA) where the LPA and Developer agree key dates for the pre-application process and determination process with a fee paid to support the resourcing of this process.</u>
11	The importance of the pre-application process is fully supported. This should be a multistage process starting at site/contextual analysis, moving on to vision/concept and on to design proposals. It is vital for developers that the pre-application service offered by the Council is joined-up and includes all the key departments.  Developers need a pre-application service that brings in all Council disciplines to consider their design proposals: planners, urban designers, ecologists, highway engineers and drainage engineers.	The multi-disciplinary nature of pre-application feedback is flagged in section 2.15	No change
7	Please could words like, "To minimise opportunities for crime to be generated or increased, community safety should be prioritised in accordance with Secured by Design principles;" be added.	Paragraph 2.12 addresses community safety but does not specifically mention secure by design.	Add following sentence to end of 2.12: <u>To minimise opportunities for crime to be generated or increased, community safety principles should be applied in accordance with Secured by Design principles without conflicting with placemaking principles.</u>
12	New streets should have trees and greenery and not be full of cars (from conversations with families and children at the play sessions). This was a strong message from children and their parents/ carers which aligns with the national emphasis on green infrastructure and for designing streets as places not dominated by vehicles. The document sets out these requirements and this is a positive endorsement of this approach.	Whilst infill and backland developments will not create extensive new street networks there may be alterations to existing streets to gain access and the nature of the smaller sites may require new cul de sac streets that are slow speed and not be overly engineered or dominated by vehicles..  The Supplement to Planning Policy Wales, Building Better Place, July 2020 reminds us that " <i>Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets. The Welsh Government will support decisions of this nature to help create better places.</i> " (p17)	Add new section to 3.0 to summarise the National emphasis on Place-led streets in the Overarching Requirements: <b><u>Place-led Streets</u></b> <u>3.10 Well-designed, green, people orientated streets are fundamental to creating sustainable places and increasing walking, cycling and use of public transport. Planning Policy Wales sets the requirement for new streets to be active and social spaces not just the sole preserve of vehicles.</u>
4	The Webinar question and answer question session indicated the following:  There are exemplars of placemaking emerging in Swansea but these may be unravelled by highway adoption requirements.  Whilst there is a process to challenge planning decisions, there is no means to take disputes at the adoption stage to arbitration.  Whilst the stage 1 safety audits may help prove place-led streets are safe, this is an additional cost to developers	The objective of place-led streets applies to all scales of development and at present this is not clearly	<u>"With exercise and social contact so vital to our health and well-being, the pandemic has reinforced the need for well-designed, people orientated streets. This forms the basis of the 'active and social streets' policy in PPW, which is supported by Manual for Streets6 and its companion guide Manual for Streets 27. PPW is clear that the design of streets should be based on urban design principles and not the conventional</u>

11	<p>With highway and drainage engineers the input at the planning stage is often overturned at the adoption stage causing immense challenges for developers. It is therefore vital that the adoption engineers are involved at the pre-application stage. If they are not, they need to be fully signed up to the planning stage highway guidance that the developers receive. This is possibly the single greatest frustration for developers in Swansea.</p>	<p>emphasised in the document and a new section is needed in the Overarching Placemaking Requirements section.</p> <p>The process for providing place-led streets via the stage 1 safety audit, tracking analysis and visibility analysis to ensure that these are safe, accessible, maintainable, green and contribute to quality of life.</p> <p>This process to test and agree place led streets at the planning stage has been used successfully on a number of sites that now have planning approval.</p>	<p><u>engineering-led approach in the now superseded Design Bulletin 32”</u> <i>(Building Better Places, P17).”</i></p> <p><u>3.11 All schemes should be designed in accordance with the suite of Manual for Streets documents which emphasises that streets are places primarily for people. Social life is concentrated on streets – they are places for meeting, playing and relaxing. Therefore, streets should be designed as places within low speed neighbourhoods with active travel priority where vehicle movements do not dominate. Streets are also an important element of the green infrastructure strategy at the local level. Streets devoid of planting will not be acceptable.</u></p> <p><u>3.12 The requirement for Green Infrastructure (GI) at all scales and mandatory SUDs requirements, will lead to much greener streets with verges/ drainage features on one, or both sides, and tree planting without compromising visibility splays adding visual interest and seasonality, providing shade, and providing habitats. The ecological and psychological benefits of street trees and planting have been proven by a number of studies, and it is expected that appropriate planting is provided in order to capture these benefits and meet the requirements of national legislation (PPW &amp; WBF&amp;G Act). Even in mews and lanes, GI is expected in the form of planting/ tree buildouts to create localised carriageway narrowings that reinforce low speeds.</u></p> <p><u>3.13 The Council expects that most new streets will be adopted; this includes non-standard street designs which must be distinctive, safe, accessible and robust. To adopt non-standard streets this will require design team to undertake:</u></p> <ul style="list-style-type: none"> <li>▪ <u>Stage 1 road safety audit process</u></li> <li>▪ <u>Tracking analysis to ensure access for vehicles</u></li> <li>▪ <u>Forward visibility checks based on design speed</u></li> <li>▪ <u>Quality audit’ process as per Manual for Streets.</u></li> </ul> <p><u>3.14 It is important that the subsequent S38 adoption process does not unravel the place-led streets agreed at the planning stage. The Council has prepared a Street Design Guide which sets out acceptable street design standards as well as the process for testing and adopting non-standard place-led street designs.</u></p>
15	<p>Within the Teams presentation for the draft SPG, it was mentioned that the Draft Streets Design Guide would likely come forward after the adoption of the Places to Live SPG. Whilst not relevant to this consultation process, the Draft Streets Design Guide appeared to conflict with the place making agenda and contents of this consultation document and therefore we would welcome a more cohesive approach between the Guidance.</p>	<p>The emerging Streets Adoption Design Guide is subject to inputs from the Placemaking Team and this document endorses the same process to provide place led streets in accordance with Manual for Streets. Therefore, there is no reason why a place led street should not be adopted but this may require additional commuted sums to fund maintenance of street trees and uplift surfaces.</p>	
11	<p>The key to the success of this SPG is that other Council departments such as highways adoption fully buy into this philosophy and support the more imaginative, people-led approach being advocated. With this joined-up thinking, developers will have the clarity and consistency they need to fully commit to placemaking, knowing that there isn’t a disconnect between planning and the other statutory processes for which the Council has responsibility.</p> <p>It should be a clear stated aim in the introduction, that this guidance will be accompanied by the Street Design Guide (Highways), and that all efforts will be taken by Swansea Council to align these documents and for officers to work in a joined-up way. There should be acknowledgement that the practices of the past have led to different approaches being taken to design of residential places.</p> <p>Planning officers have required a placemaking led approach upfront, but this is rarely backed up at the road adoption stage and this has watered down designs and created major problems for developers. This has left developers with two choices: agree to make the design changes required by the Highway Authority with subsequent delays and planning applications, or to not offer the streets/roads up for adoption. Road adoption is vital for sustainable residential places that function well and is an essential part of the Art of Placemaking. Adoption gives clarity for the long-term maintenance of streets and street lighting; refuse and recycling will be collected regularly and there will be no confusion or financial burden on future residents which can sometimes result in streets falling into disrepair where they are un-adopted.</p>	<p>Planning/ Placemaking Officers will continue to collaborate with Highway colleagues at all stages of the development process to ensure that place led streets approved via the planning process are delivered on site.</p>	
11	<p>Historically, despite Manual for Streets being in place for over a decade, <b>the primary areas of conflict between planning</b></p>		

	<p><b>policy and the implementation of the Highways Act continue to persist:</b></p> <ul style="list-style-type: none"> <li>• Street Geometry and forward visibility: Planning Policy advocates an approach that slows cars down whilst creating character and pedestrian focussed streets. Conversely (for Health &amp; Safety reasons) Highways prefer to cater for the vehicle with separation from pedestrians, and forward visibility. This usually diminishes the placemaking possibilities whilst allowing for increased vehicular speeds.</li> <li>• Shared Surfaces: Residential places with people in mind where vehicles can only drive very slowly are encouraged by planning policy, but generally opposed by the highway authority. It is often difficult to gain adoption for streets that deviate at all from the conventional carriageway framed by footways.</li> <li>• Materials: Due to restricted resources, understandably the highway authority can only retain a limited palette of materials for the repair and maintenance of streets.</li> <li>• Green Infrastructure: Encouraged by Planning Policy and this Placemaking Guide – but discouraged by Highways for reasons of forward visibility</li> <li>• On street parking: On-street parking should be an acceptable solution for residential placemaking as it avoids the blight of cars parked (illegally) on pavements.</li> </ul> <p>We have recent experience of delivering planning consented developments with ‘non-standard’ street designs - these schemes were considered to be exemplary. However, to date not a single home has been constructed due to the street designs not being accepted by the Highway adoption authority. Even when efforts have been made to avoid this scenario, the <b>disconnect between highways and planning still happens</b>, costing developers immense time and expense. The new Placemaking Guide (Planning) coinciding with the Street Design Guide (Highways) is a perfect opportunity for a healthy debate about the above points to ensure these are resolved so that developers have clarity of what’s expected and what will be supported. A Placemaking culture needs to be embedded at all levels ensuring that officers buy into this approach.</p>		
<p>5</p>	<p>Linked heavily to the Residential Design Guide, is that of the Parking Standards, and GJP and Coastal have been engaging with Swansea Officers on a number of projects that do ‘snag’ with parking provision which is based on an out-dated Parking SPG.</p> <p>It is considered <b>that this Parking SPG should be formally amended as well to align with placemaking</b>, GI and modal shift expectations of Swansea and WAG. Ultimately however, Coastal / Pennant and GJP are committed to working with</p>	<p>The Parking Standards SPG was adopted to the Unitary Development Plan so this does need to be updated to reflect current national guidance as set out in Future Wales on parking standards.</p> <p>In the meantime the Parking Standards SPG will be given reduced weight in decision making.</p>	<p>No change</p>

	Swansea to bring forward high-quality developments which will ultimately improve Swansea and put Swansea on the 'placemaking map'.		
5	<p>The increase in 'spec' from a placemaking and GI perspective in the City of Swansea needs to be fully tested in terms of site viability, especially on allocated sites in the LDP where such placemaking and GI provisions weren't perhaps expected or built into the viability of that site at the time.</p> <p>Assurances are needed that the increase in Placemaking and GI specification will not be at the detriment to scheme viability and perceived unfavourably if developers etc go through the significant expense of prompting a site through a planning application. Therefore, a careful balance needs to be struck to ensure a development can provide its 106 obligations where appropriate and reasonable to do so.</p>	<p>Understanding viability is integral to the placemaking approach and this is recognised in LDP Policy IO 1. It is recognised that aspects such as SUDS and non-standard street designs may require increased commuted sums for maintenance.</p> <p>Therefore, developers may wish to utilise the 'open book' development viability process to ensure deliverability to inform the negotiation of section 106 planning financial contributions.</p>	<p>Add reference to open book viability process with next text in section 2:</p> <p><b><u>Delivering Places</u></b></p> <p><b><u>2.18 The Swansea LDP recognises in Policy IO 1 'Supporting Infrastructure and Planning Obligations' that an essential part of delivering sustainable development is to ensure sites are capable of being developed in terms of financial viability. In support of the policy, paragraph 2.4.10 states: 'The Council expects that the costs relating to any measures required to make the development viable and sustainable will be taken into account at an early stage of the development process (including land acquisition) in order that realistic values and costs are achieved as part of the development appraisal'. In instances where developers maintain that exceptional and/or abnormal costs relating to placemaking and other requirements have a significant effect on the viability of delivering a proposal, such costs will need to be identified and assessed by all relevant parties in an open and transparent manner using appropriate viability assessment methodologies. Further details on the use of comprehensive, viability modelling and analysis by site promoters and decision makers are available at <a href="https://www.swansea.gov.uk/dvm">https://www.swansea.gov.uk/dvm</a></u></b></p>
13	There is no reference to viability or deliverability within the SPG. However, SAB Commuted Sums are currently impacting significantly on the planning process. It is clear that SAB permission is a separate process to a planning permission but the impact of SAB does need to be considered as part of the planning process when the viability of a site is an issue. It is a financial obligation in the same way a highway commuted sum is or an education or community facilities contribution is. It should, therefore, be considered as impacting on the viability of a development in the same way.		
13	The greater emphasis on placemaking, SuDs and GI is in keeping with national policy but the impact of SAB, and commuted sums in particular, needs to be considered more.		
10	Government Climate Change Strategy (Transport). There should be a greater emphasis on public transport. Some funding from the development should go towards this and places for buses to pull in at bus stops should be included.	This is the case. New developments should prioritise active and sustainable travel. Where appropriate section 106 planning contributions are sought to support bus infrastructure and bus services.	No change

<p>14</p>	<p>A statement would be appropriate to the effect that ‘the presumption is that trees are not to be removed for future developments. The assumption is that design and layout shall take existing trees into account.’</p>	<p>Section 3 sets out the overarching requirement for Green Infrastructure and paragraph 3.17 emphasises that the starting point on every site should be to work with the existing environmental constraints and opportunities</p> <p>There is a separate Trees, Hedgerows and Woodland SPG which states that the Council expects all category A and B trees to be retained and integrated to layout proposals wherever possible (paragraph 3.12).</p> <p>Where trees are proposed to be removed there is a tree replacement standard as transparent basis for agreeing multiples of replacement trees for each mature tree felled.</p>	<p>Add a new paragraph after 3.18:</p> <p><u>3.19 This section should also be read in conjunction with the separate Trees, Hedgerows and Woodland SPG which sets out the expectation that all category A and B trees will be retained and integrated into layout proposals where possible. This SPG also sets out a clear and transparent criteria for determining the number of replacement trees required for those proposed to be removed. This is based on mitigating loss of canopy cover not simply the number of trees lost. Replacement trees are expected to be large growing species for immediate presence and robustness.</u></p>
<p>11</p>	<p>The target of 35 dph as an optimum density for development in suburban areas is welcomed. When the density is varied within the site itself, this can result in a good sense of place, opportunities for trees and green space and a legible environment.</p> <p>Higher densities are appropriate closer to the centre of towns and cities. This requires increased story height, more imaginative solutions for garden spaces and communal spaces, reduction in parking standards and a relaxation of separation distances. These characteristics are all site specific, and solutions will need to be tailored to suit the site and the character of the surrounding context.</p> <p>Not clear if the density of 50 dwellings per hectare is applicable to the design of apartment-based schemes, or whether this includes homes with gardens. If the latter, would be concerned about garden sizes and the difficulty of separation distances for privacy etc. Car parking provision also becomes more challenging at the higher densities. There are hybrid residential schemes, such as Pobl’s Townhill Campus redevelopment which have adopted creative approaches to these design challenges, and in doing so provide smaller private gardens in return for a generous provision of communal greenspace.</p>	<p>These comments set out a range of different perspectives from the density requirements being too high, density requirements being too low and the need for flexibility.</p> <p>LDP Policy SD 2: Masterplanning Principles sets a net density target of 35 dwellings per hectare on schemes of more than 100 units. Experience of assessing and negotiating schemes indicates that this density is achievable with integral open spaces, retained trees, play features and sustainable drainage features provided there is a mix of home sizes on site including apartments. This is evidence in the guidance with the inclusion of a feature on the Gwynfaen Development.</p> <p>Given that the 100 unit threshold the density target does not apply to smaller sites and there is an acceptance that lower densities may be appropriate in rural/ sensitive edges.</p> <p>Clause ii of policy SD 2 sets a requirement for higher densities along public transport corridors and in focal areas. The requirement for higher densities is explained in the SPG to be in accessible and central locations.</p>	<p>Re-order section 3 to highlight density as an overarching placemaking requirement and amend density paragraphs to come after ‘key principles of placemaking as follows:</p> <p><b><u>Achieving a Suitable Density</u></b></p> <p>3.9 There is no density range target for infill and backland development, rather the number and scale of buildings will be determined with regard to the context, accessibility and amenity considerations. <u>Future Wales: The National Plan 2040 sets national placemaking principles including the suggestion that new developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. (Future Wales p66). Such high density living is identified in Future Wales as being capable of supporting the future economic and social success of towns and cities, including sustaining public transport and facilities and central area regeneration schemes. Clearly however such densities demand a development form that is typically not suited to more suburban, semi-rural and rural locations.</u></p>

<p>14</p>	<p>For reference, Jane Jacobs talks in terms of 3-400 units per hectare. Whilst we have little hope that current planning can even contemplate such figures for new developments, there is certainly a case for much higher figures in town. It is not 'high rise' that provides such figures (despite the current emphasis on student apartments), it is 'row housing', terraces, what used to be 3 &amp; 4 storey 'walk-ups', now apartment terraces. There are very few in Swansea Centre – Castle Buildings, Pearl House. The policy would benefit from a developed section on city centre apartments rather than leave it 'suburban loaded' and 'city high rise assumption' as now. Page 38 alludes to this but without conviction.</p>	<p>This is backed up by the target in Future Wales of 50 dwellings per hectare in accessible locations.</p> <p>It should be noted that the target of 50 dwellings per hectare is based on all or majority of apartments in a scheme. It is very difficult to achieve this higher density target with houses, gardens and private parking arrangements and the results are often cramped and unsuccessful places.</p> <p>City centre living infill or backland developments could be in tall buildings or low rise blocks. The Placemaking Guidance for Infill and Backland paragraph 3.2 states that, "There is no density range target for infill and backland development, rather the number and scale of buildings will be determined with regards to the context, accessibility and amenity considerations". And this could be amended to emphasise higher densities in accessible locations such as city, town and neighbourhood centres.</p>	<p>3.10 <u>Building at high densities creates a more intense and diverse urban environment, which necessitates particularly high standards of placemaking in order to balance the potential impacts on amenity against the need for more compact forms of living to come forward in certain locations. Where higher densities are proposed in the most central and accessible locations, this will typically require schemes to comprise all, or a majority of, apartments. Densities close to 50 dwellings per hectare are unlikely to be achievable without significant numbers of apartments and/or with significant numbers of houses that have private gardens and areas of private parking, plus the necessary requirements for GI and SuDS provision. High density schemes may also incorporate tall buildings, however this will not be appropriate in all instances.</u></p> <p>3.11 <u>When designing for higher density living, proposals must consider a wide range of issues in combination, including: the surrounding settlement character; the relative accessibility and connectivity of the urban location; the standards and quality of public open space that may be required; internal space standards; private external space; potential noise disturbance, and general overarching matters relating to design quality such as appropriate separation distances. Fundamentally, achieving higher density development must not be at the expense of the character of an area or the integration of placemaking requirements, and must not give rise to adverse impacts on the health and well being of existing or future residents.</u></p>
<p>14</p>	<p>For town centres (and suburbs) is there going to be anything said about the visual and physical activity of buildings at ground level 'talking to the street' - doors and windows - especially in the city centre? The assumption of high rise omits the concern re the vitality and personal safety and comfort of adjoining streets and spaces.</p>	<p>Where uses are mixed within buildings such as commercial space on the ground floor with residential above then the expectation is the creation or enhancement of active and vibrant street level frontages. This is not currently mentioned in the document and can be flagged in the 'frontages' section</p>	<p>Add a new paragraph to start of the frontages section as follows:</p> <p><u>4.31 There may be infill developments in town and city centre locations where uses are mixed within buildings such as commercial space on the ground floor with residential above then the expectation is the creation or enhancement of active street level frontages which has high levels of visual transparency plus legible and safe entrances to upper floor homes.</u></p> <p>Add highlight page of Urban Quarter development on Swansea High Street as example of low rise high density development.</p>

<p>11</p>	<p>Sustainable Design principles as part of the art of Placemaking. There are fundamental ideas such as ‘Fabric First’, form factor, solar orientation, overheating, water use and other criteria that need to figure prominently in this SPG. Each home built to today’s Building Regulation standards, is another home which will need to be retrofitted by its owners within less than a generation.</p> <p>The SPG requires a section on Sustainable Design. The Integration of Renewable Technologies Renewable energy generation at a micro level and other technologies for residential living such as electric vehicle charging need to be included within this SPG. As Wales moves way from fossil fuels for the heating and power of our homes, so we need to accept that technology will figure more prominently in the townscapes of the future.</p> <p>The Council as planning authority needs to consider that balance between the way new developments look (aesthetics) and the way they function – which includes decarbonisation as well as health, wellbeing, sense of community, and environmental impact. Renewable technologies will evolve and the SPG should take a pragmatic and flexible view, accepting that initially this may result in aesthetically unappealing buildings as society adjusts to the changes it must make rapidly</p>	<p>This has not been flagged and is a relevant comment that our homes will look different with the inclusion of low carbon technologies and lifestyles. This is an opportunity for conversion projects and new homes with a more contemporary appearance that as well design and low energy.</p>	<p>Add new paragraphs to the character and appearance sections for infill and backland developments:</p> <p><u>4.17/ 5.12 With a move towards lower energy lifestyles this will change the way conversion projects and new homes look; this is an opportunity for contemporary design in neighbourhood locations utilising modern materials and innovative architecture.</u></p>
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<p>11</p>	<p>The integration of GI and SuDS into residential development is a recent requirement and a most welcome aspect of Placemaking that adds value and benefits biodiversity, health, and wellbeing. As with other key themes that cut across different departments within the local authority, there are some conflicts emerging between the approach favoured by the planning authority and the approach preferred by the Council as adopting authority for Highways and SUDs.</p> <p>Developers want to include green infrastructure, but this is often not supported by the highway authority’s adoptions team. This SPG presents the ideal opportunity to resolve these conflicts by ensuring that the placemaking approach is fully endorsed by the highways and drainage functions of Swansea Council.</p> <p>Developers need a predictable and consistent approach on aspects such as SUDs features and how these integrate with placemaking and highways. The content of the SPG just mirrors the SAB guidance so is fairly acceptable and not controversial. However, it’s the implementation of the SUDs and the coordination with Drainage and Highways that often presents a challenge for the development process. The process itself needs to be made clear and consistent to avoid ambiguity and frustrations in getting projects off the ground. In addition, the commuted sums and subsequent management of the sustainable drainage and how this relates to the management of the wider green infrastructure also causes problems in relation to viability of projects and ongoing management.</p> <p>The SPG is an opportunity to provide the clarity that is necessary. The SPG states that “Larger sites may need a series of attenuation basins as smaller landscape features rather than a single large one at end of system.” This preference for several small ponds over one large pond is too prescriptive. For example, Pobl and Coastal followed this approach on Gwynfaen which is considered as a good scheme in terms of Placemaking.</p> <p>The SPG should include reference to the benefits of Green Roofs and Walls, which include improved air quality, biodiversity gains, mitigation of urban overheating, urban gardening, and acting as a SUDs feature where space is limited. Whilst we wouldn’t advocate such features becoming mandatory, the Placemaking SPG needs to include some principles and key questions on Green Roofs and Walls.</p>	<p>Sustainable Drainage is a mandatory requirement alongside the planning process. This has a separate consenting regime via the Sustainable Drainage Approval Body known as SAB.</p> <p>The interaction of SUDs features with street design and adoption is being understood via recent planning application negotiations and the SPG sets out helpful guidance for developers based on this learning. For example there has been a focus on whether street trees can be planted in SUDs features as part of the multi functional Green Infrastructure. Trees planted in SUDs features can cause issues of roots blocking pipes or trees having to be removed when filter mediums need to be replaced. Therefore on a number of sites a side by side approach has been developed with the street trees alongside and separated from SUDs features as green infrastructure build outs into the carriageway and this can be updated into the SPG.</p> <p>Further detailed guidance on SUDs will be provided by the forthcoming Street Design Adoption Guide which will explain how the SUDs features can be incorporated alongside the adoptable highway areas.</p> <p>Green roofs roof are referenced in Appendix 3 in terms of ‘source control’ features but there is no mention of Green Walls.</p>	<p>Officers will continue to work collaboratively to ensure SUDs and Placemaking are considered holistically in the planning and SAB process.</p> <p>Add text and image of green wall in relation into Appendix 3:</p> <p><b><u>Green Walls</u></b></p> <p><u>Green walls fall under two types: engineered systems with support for growing medium across a façade with a watering system or growing support wires for climbers planted into the ground at the base of a wall. Both can be successful for drainage source control as well as green infrastructure multi functionality such as biodiversity, urban cooling and well being.</u></p> <p>Add images of green wall and green roof after paragraph 3.24 which provides a summary of SUDs features.</p>
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4	<p>The Webinar question and answer question session indicated the following:</p> <p>Sustainable Drainage features represent placemaking and well being opportunities but implementation issues being experienced.</p> <p>Developers welcomed positive engagement of Drainage Officer via the pre-application process.</p> <p>Understanding commuted sums for maintenance of SUDs features is important for viability.</p>		
12	<p>New homes should be close to schools, shops, parks and nature (from conversations with 30 children and families at the play sessions). This was a strong message from children and their parents/ carers about the benefits of being able to walk to community facilities with benefits for health, well being and sense of community.</p>	<p>This aligns with the national emphasis on active travel and there was a clear view that having to drive everywhere was not a good thing. The document sets out these requirements and this is a positive endorsement of this approach.</p>	No change
12	<p>New homes should have larger windows and be colourful (from conversations 30 children and families at the play sessions). This was a strong message from the adults of the future of what new homes could be like to live in. Larger windows for natural light and connection to the outdoors are key aspects contributing to well-being. Colour is also important for a sense of variety and personalisation.</p>	<p>The document sets out these requirements and this is a positive endorsement of this approach.</p>	No Change to text but include photos of the houses made by the children
4	<p>The Webinar question and answer question session indicated the following:</p> <p>The requirement for space standards will create issues for the affordability of private homes.</p> <p>The housing industry is currently facing multiple issues – SUDs, Building Regs, Brexit and to add space standards on top will make sites unviable.</p> <p>Housing Associations must build affordable homes to the DQR standards but private market homes are built to a DQR lite approach.</p> <p>It was suggested that some Councils require a percentage compliance with the Nationally Described Spaces Standard (NDSS).</p> <p>Suggest amending the SPG to explain how the standards will be applied in Swansea.</p>	<p>The comments are understood however there remains a requirement to make clear what is required for space standards in relation to LDP policy PS2 Placemaking and Place Management.</p> <p>The overarching chapter 3 includes a section in relation to ‘Space inside the Home’ para</p> <p>It is not considered appropriate to remove the space standards from the SPG nor to substitute a vague reference to avoiding unacceptably small homes which is not helpful to developers or decision makers.</p> <p>It is therefore considered appropriate to maintain the reference to factual space standards information at the UK level in terms of the NDSS and to bring in references to the recently updated Wales Development Quality Requirements 2021 (WDQR 2021).</p> <p>With regard to the WDQR 2021 launch it was indicated that the Welsh Government has aspirations for all homes to comply to its standards by 2025.</p> <p>To address the development industry concerns it is proposed to move the NDSS and WDQR to an appendix and to amend the wording of paragraph 3.28 to indicate that the factual space standards are a starting point for consideration. This brings in flexibility of application and</p>	<p>Move Fig K.5 Nationally Described Space Standards (NDSS) to a new appendix and add recently updated Welsh Development Quality Requirements (WDQR 2021) as the factual published space standards for UK and Wales.</p> <p>Delete Paragraphs 3.28 and 3.29 and replace with the following:</p> <p><u>3.36 The quality and configuration of proposed internal living environments have a direct bearing on how homes support different lifestyles and the various needs of occupants, and can also have a significant effect on peoples well-being. These are important elements of placemaking to be considered alongside matters such as the outside amenity space that is proposed, and the wider provision of public open space in an area. Homes must have a convenient and comfortable layout for everyday living, with adequate storage and space to move about without feeling cramped and/or restricted when undertaking daily tasks and duties, including working from home.</u></p> <p><u>3.37 There are internal space standards published by UK and Welsh Government’s, which apply to different tenures and types of housing development (see</u></p>
11	<p>The SPG updates the minimum space standards and includes, as a guide, the Nationally Described Space Standards which is currently English Planning guidance. The reason for this is that the WG are still to publish their space guidance. We are very conversant with the concept and benefits of Space Standards (including Lifetime Homes) as we have been developing grant funded homes for social rent to these standards (DQR 2005) for many years where this has been a mandatory requirement. However, we often develop homes for sale, often alongside our</p>		

	<p>social homes – and we understand the commercial viability challenges of achieving the same Space Standards on homes that are not grant funded.</p> <p>The commercial reality of housebuilding in Wales makes achieving the Space Standards in the SPG impossible for some private developers. Development costs now need to reflect mandatory requirements for SUDs, Sprinkler systems, inclusion of play and public open space, and soon Green Infrastructure and Low Carbon homes will become mandatory. All of this makes the delivery of homes in Wales more challenging commercially, but developers are trying to catch up as we know that more and better homes are required to address other agendas. This challenge needs to be recognised by Swansea Council and a more pragmatic approach adopted to the application of Space Standards.</p> <p>The Space Standards represent what Swansea Council considers to be the target for all homes. Developers should be encouraged to achieve these but if they fall short for commercial reasons, this should result in refusal. Homes with excessively small space standards should be strongly discouraged. Pobl are willing to work with Swansea Council on the issue of space standards, as we have considerable experience of this. We have successfully developed homes for sale to a good space standard alongside homes for social rent. We have received positive feedback from our purchasers in relation to the space in their homes.</p>	<p>scope for developers to justify the size of homes proposed.</p> <p>If there is a house type that falls below the space standards then the amended wording would require the room/ furniture layout to be shown to confirm if a comfortable living environment taking into account affordability.</p>	<p><u>Appendix A). Proposals for new homes and residential conversions of existing buildings will be assessed having regard to the standards that exist, in order to assist in the consideration of whether living environments proposed for both open market and affordable homes are acceptable.</u></p> <p><u>3.38 Where new homes proposed fall below published space standards, applicants must clearly demonstrate why the particular house type proposed is considered appropriate in the context of the wider scheme proposed, and that it will provide suitable living environments having regard to peoples requirements for daily living and the wider needs of future occupants. Floor plans should be provided to illustrate, for example, potential furniture layouts and circulation areas. This analysis and justification can be provided in a submitted Design and Access Statement.</u></p> <p><u>3.39 The Council will take a flexible and pragmatic approach to considering the suitability on certain housetypes that fall below the published standards, where these form part of a wider scheme that otherwise meets the standard requirements. Such an approach will not permit unacceptably small or unusable living arrangements will be supported.</u></p>
<p>13</p>	<p>The use of space standards is welcomed. However, the NDSS cannot be imposed through a SPG if they have not been incorporated into a Development Plan first.</p> <p>The NDSS was introduced on 27 March 2015 in England only and was done so through a Written Ministerial Statement on that date. The standards themselves are set out in a document entitled “Technical Housing Standards – Nationally Described Space Standards”. It was amended on 19 May 2016.</p> <p>The status of the NDSS is explained in the “Housing: Optional Technical Standards” section of the Planning Practice Guidance, which was introduced on the same day as the Written Ministerial Statement (27 March 2015) and updated in part on 19 May 2019. The start of the text, which is dated 27 March 2015 reads:</p> <p><i>INTRODUCTION What are the new optional technical housing standards? The government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes. The government set out its policy on the application of these standards in decision making and plan making in a written ministerial statement, which also withdraws the Code for Sustainable Homes aside from legacy cases.</i></p>		<p><u>3.40 Where space standards are published and/or updated by the Welsh Government in the future and identified as being applicable to all homes, such standards will be used as the appropriate basis for assessment of the acceptability of the proposed internal living environments on all developments.</u></p>

	<p>It is then stated at Paragraph 2 of the PPG: ‘What optional technical housing standards can local Planning Authorities set?’ <i>Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans.</i></p> <p>It follows that an LPA cannot impose the NDSS simply because the officers or members wish to do so. The LPA must gather evidence to justify the imposition of these standards, including needing to show why standard should be imposed which are above those set out already in Building Regulations. Thereafter, the LPA can only introduce them through the local plan process. That is, through the full process of preparing an evidence base for the plan, public consultation, consideration by an independent planning inspector, an examination in public and adoption of the plan. None of this has happened in Swansea.</p> <p>In addition, DQR or WHQS Standards are applicable to affordable housing in Wales. It is, therefore unlawful to ask for affordable dwellings to meet higher standards than those already specified by Welsh Government who have not introduced NDSS. If Swansea wish to include the NDSS in the SPG then the wording of paragraph K.10 should be amended to reference it as an optional standard instead of mandatory standard until such time as WG see fit to introduce their own version of the NDSS. Another reason for making them optional is that increased floor areas mean that the density specified in paragraph B4 of 35 dwellings per hectare might not be achievable and the sales price is unlikely to increase meaning the viability of the site is brought into question.</p>		
11	<p>Protection of Residential Amenity. Are the separation distances that are set out in this part of the SPG applicable to residential developments within ‘suburban areas’, or do they also apply in higher density parts of towns and cities? In higher density developments, especially where existing building lines and established character suggests a denser form of development, the application of rigid separation distances contradicts other placemaking principles within this SPG. There should always be the ability to pragmatically apply these rules flexibly according to site specifics.</p>	<p>Paragraph 3.52 indicates that a degree of overlooking is common in higher density developments and the stage that this is unacceptable will be assess with regrd to individual circumstances.</p> <p>Therefore, there is sufficient flexibility to address privacy in higher density schemes without necessarily requiring the separation distances.</p>	No change
9	<p>The required back-to-side distance is stated as being 15m. I suggest this is a little too generous and could lead to an inefficiency with the residential block. (I would also note that the storey height and level change should also be a factor.) We would typically expect 12m a reasonable distance.</p>	<p>In back to side relationships there can be a blank side gable at the end of the garden for the corner property. It is felt that a 12m back to side distance would result in unacceptable overshadowing and overbearing and that 15m strikes the appropriate balance between amenity and density of layout.</p>	No change

<p>11</p>	<p>A mixed approach to parking is supported, as is a pragmatic application of parking standards where sustainable travel objections can be evidenced. Parking on plot in front of the home is sometimes necessary – especially for terraced homes, and to avoid large rear parking courts, which cause other issues such as community safety.</p> <p>Pobl has demonstrated at Beacon Hill how frontage parking and integral garages can be achieved imaginatively whilst still achieving good placemaking principles. The role of on-street parking will become more prominent as the parking on pavements becomes illegal in Wales. Consideration should be given to wider street design, which streets are appropriate for on-street parking, and whether resident only permits will apply – as they do in established part of Swansea. The implications of Electric Vehicle Charging on streets of terraced homes with on-street parking will become a challenge which both Swansea Council and developers will need to overcome with imaginative solutions.</p>	<p>The support for this guidance module is noted.</p> <p>Frontage parking can work where part of the placemaking approach combining planting and GI so that the parked cars do not dominate the streetscene.</p> <p>The guidance encourages a return to on street parking and this is actively being discussed on at least one strategic housing development.</p>	<p>No change</p>
<p>13</p>	<p>Can electric vehicle charging be provided or retro fitted in the future. Unless there is on plot parking it is difficult to provide the necessary infrastructure and there are also issues with capacity in the network in certain locations which also means it is not possible to provide it. Passive provision, however, is one way to ensure the infrastructure is installed with it then being up to the individual homeowners to arrange the final point of connection but this is only applicable to new developments and cannot be retrofitted to existing developments for the reasons highlighted above.</p>	<p>The evolution of electric vehicle technology is evolving rapidly and new charging systems will become available. This should not preclude on street parking in new developments, plus street charging of electric vehicles will need to be retro fitted for the many thousands ad existing homes that only have on street parking.</p>	<p>No change</p>
<p>7</p>	<p>Could it be added “All parking bays must be overlooked by rooms in properties preferably that are usually occupied”.</p>	<p>Whilst parking spaces should be well overlooked for personal safety and to discourage car crime as already stated in the document. It is not appropriate to require that the house served provides the overlooking because this would preclude side drive arrangements and rear parking courts.</p>	<p>No change</p>
<p>4</p>	<p>What we build will last 100 years so we need to get places right and don't create costs for policing.</p> <p>Parking and connectivity are key issues for crime/ safety.</p> <p>Design out pavement parking.</p>	<p>The document sets a framework for safe sustainable places as the basis for cohesive communities.</p> <p>Green infrastructure is an opportunity to design out inappropriate parking.</p>	<p>No change</p>
<p>2</p>	<p>The Canal &amp; River Trust supports the restoration of all abandoned canals, and we own and maintain the majority of the existing route of the Swansea canal. The Trust is not currently leading on the restoration of the Swansea Canal, but we fully recognise and support the hard work and dedication of the volunteers of the Swansea Canal Society (SCS), and the Inland Waterways Association in both campaigning and working on the ground along with the Waterways Recovery Group to delivery improvements to the canal.</p>	<p>Waterways are important corridors both people, nature and recreation.</p> <p>A number of sites in Swansea relate to the canal network not least in Clydach and the SA1 Port Tennant areas.</p> <p>The LDP sets out protected areas that are safeguarded for canal reinstatement.</p>	<p>No change</p>

<p>The Trust see design and placemaking as playing a key role in creating attractive waterside places that will enhance and protect the waterway. In our capacity as statutory consultee we, strive to make sure any new waterside development enhances the wider waterway corridor and protects the intrinsic qualities that waterways offer. This can be achieved in several ways and is dependent on many factors, many of which are suitably covered in the document.</p> <p>Although there is limited scope for new development alongside the Swansea canal, like all new development sites, each waterside location needs to be considered individually, with no single design approach being appropriate in all locations. The following guiding principles should be taken into account so that, where appropriate, new waterside development should:</p> <ul style="list-style-type: none"> <li>• positively address the water</li> <li>• integrate the towing path and open up access to the water</li> <li>• link waterside space and the waterspace</li> <li>• use the waterspace itself</li> <li>• incorporate access and other improvements</li> <li>• engage with and tease out the qualities and benefits of being by water</li> <li>• reflect the scale of the local waterway corridor to the wider neighbourhood</li> </ul> <p>We advocate that new development positively addresses the waterspace with roads and parking hidden by housing and this often causes a conflict when placemaking suggests that housing addresses roads in a similar way. We suggest that the canal be considered as a highway too and so development may need to effectively be double fronted to prevent back gardens, high privacy fencing and garden paraphernalia fronting onto the waterway which may have an adverse impact on the canal corridor.</p> <p>The canal represents a very important multi-functional green infrastructure asset running through the city and county of Swansea and linking to Neath Port Talbot. Development alongside it should consider all aspects of the canal and protect and enhance the network without preventing future restoration or improvement. We would encourage potential developers to undertake pre-application discussions with us and to include the canal or restoration route, towpath and environs within their application site.</p>	<p>The SPG sets a approach of responding to context including waterways and public areas such as canals.</p>	
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