

**REPORT ON CONSULTATION UNDERTAKEN ON DRAFT Supplementary Planning Guidance  
Placemaking Guidance for Householder 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 HOUSEHOLDER 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 some were also relevant to the draft Placemaking Guidance for Householder Developments.
- 1.8 The full comments made by respondents that are relevant to the draft Placemaking Guidance for Householder 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 Householder 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 1.6 to reference existing successful sustainable places as follows:</p> <p><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></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 (1.8) 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>1.8 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 style="text-align: right;"><u>Foreword from the Minister Julie James MS (p2)</u></p>

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.	<p>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.</p> <p>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.</p> <p>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></p>	<p>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 is to facilitate the Placemaking aspirations of the Council and deliver the key objective of significantly raising standards of design across the County.</u></p>
13	Whilst the majority of the SPG is focused on the principles of placemaking, some of the prescriptive content could slow down 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.		
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	<p>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.</p> <p>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.</p>		

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

Respondent	Summary of comments	Council response	Recommended change
11	<p>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.</p> <p>The Guidance modules section is clear and helpful. It also provides principles as opposed to rules allowing for some</p>	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

	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.		
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 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 3.80-3.89 address community safety but do not specifically mention secure by design.	Amend paragraph 3.81 as follows: <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>
5	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.  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 Swansea to bring forward high-quality developments which will ultimately improve Swansea and put Swansea on the 'placemaking map'.	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.  In the meantime the Parking Standards SPG will be given reduced weight in decision making.	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>Paragraph L.2 references the Protection of Trees SPG and this needs to be updated to reflect the recent updated version.</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>Amend paragraph L.2:</p> <p><u>L.2 The Trees, Hedgerows and Woodland SPG sets out the expectation that all category A and B trees will be retained and integrated into 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>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 in section G which addresses ‘Enhancement Schemes’ such as whole house refurbishments. This is a relevant comment that our homes will look different with the inclusion of low carbon technologies and lifestyles. This is an opportunity for remodelling projects to have a more contemporary appearance that as well design and low energy.</p>	<p>Add new paragraph after G.3:</p> <p><u>G.4 With a move towards lower energy lifestyles, sustainable living and sustainable materials this may change the way remodelled homes look; this is an opportunity for contemporary design in neighbourhood locations utilising modern materials and innovative architecture.</u></p>

<p>4</p>	<p>The Webinar question and answer question session indicated the following: Sustainable Drainage features represent placemaking and well being opportunities but implementation issues being experienced. Developers welcomed positive engagement of Drainage Officer via the pre-application process. Understanding commuted sums for maintenance of SUDs features is important for viability.</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. 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. 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. 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. Add text and image of green wall in relation into Appendix 5: <b>Green Walls</b> <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>12</p>	<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>	<p>No Change to text but include photos of the houses made by the children</p>
<p>11</p>	<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 3.35 indicates that a degree of overlooking is common in higher density developments and the stage that this is unacceptable will be assess with regard to individual circumstances. Therefore, there is sufficient flexibility to address privacy in higher density schemes without necessarily requiring the separation distances.</p>	<p>No change</p>
<p>9</p>	<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>	<p>No change</p>

<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>