

## **The Response of the Community of Penllergaer to the LDP Preferred Strategy**

1.1. The Community Council is responding on behalf of residents to the housing development proposals for Penllergaer as contained in the Preferred Strategy.

1.2. Following a public meeting in early September and several subsequent meetings of an Action Committee, set up to consider the detail of these proposals, the Community Council's opinion is that a further thousand houses or more in Penllergaer is unsustainable and therefore unacceptable for the reasons detailed in this submission. In making this objection, the Community Council is reflecting the views and concerns of residents and also the conclusions of the Action Committee, members of which have carefully examined the implications of a major extension to Penllergaer.

1.3. The Community Council feels strongly that the Bellway Vision seems deliberately to underemphasise the robustness of the existing community. For example, on page 4 of the *Vision for Penllergaer* is the comment that the village *does not benefit from a clear centre*. That seems an ill judged remark to make given that the church, the pub, one of the community halls, a convenience store within the filling station and the sports field are all sited within a short distance of each other on or just off Swansea Road. Close by is the school, another community hall and also Gors Common. This area clearly constitutes the centre of the village and all large scale community events – such as the Jubilee celebrations in 2012 and the Community Fun Day in July of this year – take place on the sports field, in the Llewelyn hall and in the spacious sports pavilion.

1.4. The Community Council therefore believes that Penllergaer is well provided for in terms of facilities and is fully sustainable without the need of a further 1,000 homes to create a new and unnecessary focus.

1.4 The Community Council therefore objects on behalf of residents to the proposals contained in the Preferred Strategy and the reasons for its objections are expanded below.

### **2. Economic and Employment**

2.1. First and foremost, the Community Council remains unconvinced by the arguments for growth as set out in the background paper ***Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot***.

2.2. The base forecast for the Swansea economy 2015-25 is for 6,100 new jobs. It is only after various adjustments and the potential for policy interventions that the upper end growth scenario of 14,700 is reached but it is on this figure that the required number of new homes appears to be predicated. It states in paragraph 1 page 6 of the Economic Assessment *'Based on the number of extra workers that would be required to match the number of additional jobs without needing to increase in-commuting along with meeting the Council's objectives for raising local economic activity levels and reducing unemployment, it is estimated that a net additional 16,421 homes would be required within the County over the plan period'*.

2.3. In the Community Council's view 14,700 new jobs is an over optimistic and unrealistic assessment of future job prospects for Swansea. It follows, therefore, that the need for 16,700 new homes is also likely to be overstated.

2.4. The City and County also seem to share concerns about the future job prospects for Swansea and comment in Improvement Objective 5 in the **Annual Review of Performance 2012-2013**, page 32 that '*Further spending reductions are likely to take place meaning that the public sector is expected to shrink. Cities like Swansea that are reliant upon public sector employment are particularly vulnerable.* It then adds *The City and County of Swansea will need to prepare for the consequences of further reductions to the size of the public sector workforce.*

2.5. The evidence produced in the *Economic Assessment*, referred to above, likewise makes reference to Swansea's dependency on public sector jobs and also points out that in regard to the working population of Swansea, which is 150,100, there are 75 jobs for every 100 residents of working age. This suggests that 25% or 37,525 of working aged people in Swansea are not in employment. Interestingly, however, the number of registered job seekers is only about 5,000. However, even making allowances for those not working for various legitimate reasons - stay at home mothers and long term illnesses, for example, there would appear to be sufficient unemployed working aged people already in Swansea to fill the minimum number of new jobs ie 6,100, and even the upper figure of 14,700. It would also seem reasonable to conclude that the 37,523 of working aged people not currently in employment are nevertheless already living somewhere in Swansea and, in the unlikely event of a future jobs explosion, would be available to take up some of the vacancies without the need to move into a new home.

2.6. The Community Council therefore considers that more work needs to be done on future job growth in Swansea and the higher figure of 14,700 modified to take account of the City and County's more gloomy forecasts in this respect.

### **3. Sewerage**

3.1. The lack of capacity at the Gowerton Treatment Plant is well documented and is acknowledged within the Preferred Strategy. Specific problems in Penllergaer are highlighted in Topic Paper – Physical Infrastructure - Para 2.39 - as this area has one of the highest numbers of recorded sewer flooding incidents caused by overload across Swansea.

### **4. Traffic**

4.1. The volume of traffic travelling through Penllergaer to J47 is a matter of huge concern to residents. The Community Council is aware that, whilst J47 is not yet quite at full capacity at peak times, there are increasing traffic pressures at this junction with regular queuing on both the north bound lane of the A483 and the approach from the west along the A48.

4.2. However, of greater significance is the impact that a further large scale housing development would have on traffic volume on the A4240 (Gorseinon Road – a residential road for much of its length) and the Penllergaer roundabout.

4.3. Bellway acknowledges the traffic problems in its *Vision for Penllergaer* Page 7 by confirming that Gorseinon Road is at *saturation during peak periods* and that the Penllergaer

Roundabout is *operating at capacity*. This would seem to be an under estimation of the situation in regard to the latter, as at peak times it is operating well over capacity and is not considered by City and County traffic engineers to be capable of handling a further increase in traffic.

4.4. The Community Council recognises that the Bellway *Vision for Penllergaer* incorporates a new road to link from a point on Gorseinon Road to the A484 in an attempt to relieve this congestion, but remains unconvinced that this would be the realistic outcome. Whilst it may be reasonable to argue that many occupants of homes on the Parc Mawr site would work in Swansea and would thus head south on the new link road in, say, the morning peak, a substantial proportion would relocate to this area specifically because of its convenience for J47 and the M4, and their places of work along this strategic corridor.

4.5. This fact is very clearly evidenced in the breakdown figures in the **Ward Profile** for Penllergaer July 2012 (Page 9.) Out of 1,078 people (2001 figures as the full scope of updated 2011 census figures is not yet available) aged between 16-74 who are described as *economically active* (includes 47 unemployed and 38 full time students) a total of 238 work Out of County – Bridgend, Cardiff, Carmarthenshire etc and 176 work in employment destinations within the City and County of Swansea that involve travelling along the M4 or the A48, such as Llangyfelach, Morryston, Llansamlet, Clydach, Landore, etc. In all, it is reasonable to assume that 40.83% of the working population of Penllergaer use the M4 and A48 (to Llangyfelach) to reach employment as opposed to travelling into Swansea via the A483. There is no basis to believe that any future residents of a development at Parc Mawr would buck this trend. The Community Council would also argue that such new residents would be likely to favour Gorseinon Road as their route of access to J47 rather than the more circuitous option south to the A484 and then north on the A483. This would add significantly to the congestion at the Penllergaer roundabout.

4.6. Furthermore, the Community Council believes that three out of the four optional access points onto Gorseinon Road for the proposed new road, as identified in the Bellway *Vision*, are unlikely to be achievable in terms of traffic management and road safety. That would leave the existing access point onto Gorseinon Road from Phoenix Way as the only viable option.

4.7. The Community Council has also undertaken a further assessment of potential traffic growth on Gorseinon Road in regard to new builds west of Penllergaer - in Gorseinon, Penyrheol and Loughor. Approximately 121.619 hectares of land has been put forward as candidate sites for residential development in these locations. If only 50% of this land is ultimately developed that would total about 60 hectares. At a minimum build of 30 houses per hectare the potential is for over 1,800 new homes, and at least a proportion of occupants are likely to be heading to employment along the M4 via Gorseinon Road, the Penllergaer roundabout and J47. The Community Council therefore believes that this potential must also be factored into future traffic impact assessments.

4.8. Pressures on Gorseinon Road at peak times have an inevitable consequence for the A48 Pontardulais Road and traffic from Pontlliw and further north. Priority on the Penllergaer roundabout is for traffic from the west (Gorseinon Road) and therefore lengthy queues form along Pontardulais Road with drivers unable to access the roundabout because of the constant flow of vehicles. The Community Council does not believe that the proposed new

link road in the Bellway *Vision* will in any way reduce the volume of traffic along this road and therefore supports a solution that would take traffic from the north directly to J47, thus entirely avoiding travel through Penllergaer.

4.9. The Community Council supports an Origin and Destination survey and believes it is vital that the capacity of the Penllergaer roundabout is properly assessed during this process.

4.10. The Community Council would also point out that a former Head of Transportation at the City and County confirmed (**Proof of Evidence re Bryn Dafydd Farm para 5.17**) *that he would not support a strategic highway access from the strategic highway network (either from the A483 or A484). The imposition of a new junction at this point would adversely affect the operation of this section of highway, which was constructed to provide a fast and direct route from central areas of Swansea to towns and communities further west.*

4.11. The Community Council endorses this statement and believes that any proposed new access onto either the A483 or A484 should continue to be resisted.

## **5. Agricultural land**

5.1. In terms of its agricultural value, Appendix 1a *Agricultural Land Classification* shows the situation in regard to the whole of Wales. It is clear that higher quality agricultural land – Grades 1 to 3 - is in short supply with the greater proportion of land in Wales designated lower Grades 4 or 5.

5.2. Appendix 1b shows the *Agricultural Land Classification* for the City and County of Swansea and Appendix 1c, the land classification in Penllergaer including that at Parc Mawr farm. It can be clearly seen that the latter is assessed as Grade 3

5.3. Furthermore, Appendix 1d indicates that at least part of Parc Mawr farm was identified as being subdivision Grade 3a and was one of the reasons for the refusal at a planning appeal in 1981 in regard to a small residential development at Parc Mawr. Evidence was provided by a representative from the Agriculture Department of the Welsh Office who informed the Inquiry that the entire land area put forward for development at that time – 4.5 hectares - was Grade 3 and *'demonstrably fell into the best half of Grade 3 classification sub-grade A*. It was also pointed out that 'some 45% of the agricultural land area of the then West Glamorgan was of a quality less than that of the appeal site. Additionally, it is worth noting that this land received EU grants – as much as £95,000 in the late 70's and early 80's - for general improvements.

5.4. Planning Policy Wales states that land graded 1, 2 and 3a should be conserved as the best and most versatile land and a part of Parc Mawr clearly fell within these parameters in 1981.

5.6. In contrast, current advice from the Natural Environment and Agriculture Team, Land, Nature and Forestry Division, Welsh Government is that the differentiation between Grade 3a and 3b does not exist for the majority of areas post 1988.

5.7. Additionally, the Community Council believes it is salient to point out that prior to the **UDP, Post Inquiry Modifications 2008**, an amplification for Policy EC13 was included which recognised the lack of good quality agricultural land in Swansea and embodied this in

the following paragraph, then noted as 2.5.13: *The County does not have any top quality agricultural land of grades 1 & 2 outside the Gower AONB with poor quality farmland predominating. In these areas of poorer farmland, subgrade 3b is considered to be locally valuable to the agricultural and rural economy. Accordingly it is included as part of the 'best and most versatile land' within the County'.*

5.8. The Community Council notes too that in the **Response by the City and County to Proof of Evidence 2007 page 6 sub para 2(iv)**, the City and County regarded land at Parc Mawr farm as protecting the setting of the urban area, stating *that the open rolling farmland character of the land to the south of Penllergaer and viewed to the rear of the properties fronting Swansea Road and Gorseinon Road would be fundamentally changed should this area be released for development.*

5.9. It also suggests on Page 5 sub para 2.15(i) that loss of agricultural land could lead to the agricultural unit proving unviable. This indeed would be the inevitable outcome of the release of this land for a thousand houses.

5.9. With reference again to the Planning Inquiry in 1981, when residential development was refused at Parc Mawr, it should be noted that in his conclusions the Inspector commented that *the appeal site appears not as a small pocket of land mostly surrounded by residential development but an integral part of the extensive agricultural lands which abut development fronting Gorseinon Road and Swansea Road and extend to the south and west. The effect (of residential development) would be to extend considerably the built up area of Penllergaer into an area of predominantly open countryside.* (Appendix 1e) The land at Parc Mawr remains largely as it was in 1981.

5.10. However, there has already been some loss of greenfield, agricultural land in Penllergaer as a consequence of the UDP with over 7.8 hectares being given for the development of 246 houses at Parc Penderri and Broadwood. A similar area of farm land has also been allocated for 200 houses North of Llewelyn Road for which outline consent has already been lodged.

5.11. The Community Council believes that if a local food policy is to be developed for Swansea, as has been mooted, then it is important that pockets of Grade 3 agricultural land such as at Parc Mawr farm should be retained. Therefore, in the interests of future sustainability and in order to protect the open countryside, there should be no further loss of better agricultural land to housing developments when that of a lesser quality is available in greater quantities elsewhere.

5.12. Some recent photographs, (Appendix 1f ), show that Parc Mawr is being farmed as grazing land for cattle and also for crop growing.

## **6. Wildlife and Biodiversity**

6.1. A revised ecological survey was conducted of Parc Mawr farm in 2007 when land was put forward for inclusion in the UDP and an inquiry was held. This survey concluded that in terms of the ecological evaluation of the site, a large area was of District Value as opposed to the lower level Local Value (Appendix 2a.) This Ecological Plan also shows smaller areas of land that were regarded of High Local Value.

6.2. It was stated in the report **Wildlife and Biodiversity Statement of Case**, para 3.1 that the southern and western parts of the site were considered to be *Distinct Value for nature conservation by virtue of its extent, the presence of a local plant (whorled caraway), local invertebrates (eg black darter dragonfly) and their overall species-diversity. In combination with the surrounding hedgerows and scrub features, these grasslands are considered to form part of a larger coherent unit of habitats which is collectively assessed as being of high ecological value.*

6.3. Conveniently, in 2007, the area of land assessed as of *District Value* was not part of the proposed UDP allocation site. However, in terms of the Preferred Strategy and Bellway's Vision for Penllergaer, it clearly is.

6.4. The Community Council also notes the reference to Green Infrastructure in the Preferred Strategy (page 59, Para 7.24 and 25) and agrees with the statement that *Development that unacceptably compromises the extent and quality of green infrastructure provision will not be supported.*

6.5. In its view, land at Parc Mawr farm forms a significant tract of open countryside on the urban fringe where there is clear evidence of high biodiversity, making it of considerable ecological value and an important part of the green infrastructure.

## **7. Green Wedge**

7.1. The land at Parc Mawr farm also forms part of the Green Wedge as designated in UDP Policy EV23, and amplification 1.7.5g and based on Planning Policy Wales Guidance

7.2. Whilst the Community Council acknowledges that Green Wedge boundaries can be redefined to reflect changes in strategic policy it would point out that the City and County robustly defended the Green Wedge designation for land at Parc Mawr in its response to Proof of Evidence at a public inquiry as recently as 2007.

7.3. **In the Response by the City and County to Proof of Evidence, April 2007** para 3, (entitled **The Council's Response**) page 5 sub para 2.15(i) Green Wedge designation is cited as important for the '*Prevention of coalescence*. It acknowledged *that the proposed omission site would not in itself lead to coalescence between Penllergaer and Fforestfach. However, development of the larger site area would and the Council considers the proposal to be the thin end of a very large wedge. If the omission site was released as proposed, it would immediately put land to the west and adjoining access road under pressure for development. If the agricultural unit subsequently proved unviable there would be further pressure to release land extending south of the current settlement limits, thereby contributing to coalescence.* (Appendix 3a)

7.4. It goes on to say that the Green Wedge is an important tool to manage the urban form and that in this location, the frontage development on Swansea Road and Gorseinon Road limits the development to the rear. A breach of this containment *would open up the possibility of further development to which there would be no defensible boundary.* Para 2.15(ii)

7.5. In para 2.15(iii) there is reference to safeguarding the countryside. It states that Parc Mawr farm is *part of the open countryside. It is certainly not perceived as being part of the*

urban form. Furthermore, as the land is located in close proximity to the M4 it will remain under constant pressure for development: hence the extra protection of Green Wedge status is essential.

7.6. In the Community Council's view the arguments used by the City and County in 2007 – only six years ago - for the retention of the land Parc Mawr within the Green Wedge were robust and logical. It would therefore be difficult for the community to understand the justification for any change in this position.

7.7. Also included in Appendix 3b are some relevant comments from the **City and County of Swansea UDP Inspector's Report**.

*In para 5.2.28 he states that I consider the Plan approach of restricting the releases of further greenfield sites on the urban fringe and of seeking to resist urban expansion pressures, to protect the form and setting of settlements and to prevent coalescence, is well merited. In consequence, I consider that the green wedge designations proposed by the Plan are not excessive or overly prohibitive, and should be adopted as integral to the overall development strategy of the Plan.*

## **8. Education**

8.1. The Community Council notes that the Bellway Vision would deliver a new primary school for Penllergaer. It should be remembered, however, that the existing school, to replace the one constructed in the 1890's was built less than 40 years ago and traditionally served only the community of Penllergaer. Pressures within Penllergaer itself from new developments have therefore been successfully absorbed. However, the catchment area was extended some years ago to incorporate Tircoed village which is well outside the ward boundary. There are now some 104 children attending Penllergaer Primary from this large housing estate.

8.2. With regard to another new school, clearly this would be needed if one thousand houses were to be built in order to accommodate at least a further 200 or more children, using the current formula. The Community Council would question whether a very large primary school with the potential of over 600 children is either desirable or appropriate.

8.3. The Community Council would also point out that the feeder comprehensive for Penllergaer is not Penyrheol as seems to be suggested in the Vision but Pontardulais which is already at capacity. What additional provision will therefore be made for post 11 year old children?

## **9. Alternative housing locations**

9.1. The Community Council believes that for the reasons indicated above, no further large scale housing development should be located in Penllergaer. Instead, it considers that the urban village proposed for Velindre should be extended to accommodate at least 2,000 homes in order to ensure that this new community is fully sustainable and capable of supporting the facilities that are described as going to be delivered. It is a 100 hectare

greenfield site so well able to accommodate over 3,000 homes. The Welsh Government, who own the site, have indicated that it could provide a mix of affordable and private housing with associated community facilities including schools and leisure opportunities, to offer ‘a *destination with a strong sense of place and community*’ and has funded a feasibility study to be submitted as part of the LDP process.

9.2. From the agricultural classification – see Appendix 1a – it is clear that the land is Grade 4 so of a lesser quality than at Parc Mawr farm. The site could also have the benefit of direct access onto the A48 and M4 motorway at J46. The Welsh Government has already invested £11.7m for infrastructure in this location to stimulate interest in the brownfield, 60 hectare employment site adjacent to the proposed urban village.

9.3. To illustrate the need for a community to be of a sustainable size, the Community Council would point out that in Penllergaer, the number of dwellings currently (and inclusive of a completed Parc Penderri) is just over 1,400. With a potential build north of Llewelyn Road, that number will increase to in excess of 1,600 households.

9.4. In terms of amenities, Penllergaer already has a church, a school, a well used pub and two community halls. The Llewelyn Hall - funded by a lottery grant and built to replace an old and dilapidated church building, is situated on Swansea Road. A short distance away, the former Victorian school building on Pontardulais Road is also a community building, referred to as the Village Hall, which accommodates a full time day nursery and a room for other community activities. This hall is owned and managed by the Community Council who also built, owns and runs a large pavilion together with a sports field consisting of two football pitches and a cricket pitch. The intention is to provide further sporting opportunities on this complex.

9.5. To enable the Community Council to sustain its facilities and to provide floral displays, some funding towards the maintenance of the graveyard and to various community organisations, it sets a modest precept of around £32,000 a year which is shared across the households in the ward.

9.6. Thus, in the Community Council’s view, bearing in mind the likely financial climate of the future, those living in any new urban village will themselves inevitably be required to manage and maintain most of the facilities, delivered as part of the overall development. It follows from this that the number of dwellings required to generate the necessary funding must be at a level that ensures that the financial burden on individual households, which will be in addition to the Council Tax, is kept at a minimum. Thus, in the Community Council’s opinion, the financial and managerial sustainability of community facilities of the kind to be delivered in any new urban village will need to be brokered on larger size developments than just one thousand homes.

9.7. The Community Council would also point out that the district railway line runs close to Velindre and would view this as offering the opportunity to provide a sustainable alternative travel connection between the new urban village and elsewhere.

9.8. The Community Council also considers that a further more sustainable option for additional homes is on land adjacent to Tircoed and is aware that a development proposal was submitted at this location during the previous UDP process. The present isolated community of 480 homes has few facilities – a shop and a small hall – with 104 children



attending Penllergaer Primary school adding to its accommodation pressures. It notes that currently households are paying as much as £75 per annum towards the running of a Trust which is responsible for the maintenance of the village hall and the general upkeep of the area as a whole. More homes could generate the funding needed to improve village amenities, with the additional benefit of potentially reducing the financial charge on each individual household.

9.9. The Community Council believes an enlargement of Tircoed could also provide the opportunity of a direct access to J47 thus reducing the traffic congestion in Penllergaer that occurs along Pontardulais Road. This would mean noise, nuisance and disturbance on what is a long established residential road could be brought down to a more acceptable level. Such a link could be provided directly from an extended Tircoed Village – or off the A48 north of the M4 motorway bridge – to the northern arc of J47 thus taking traffic away from Penllergaer entirely.

9.10. In conclusion, the Community Council, with the full support of the Action Committee, believes that any further large scale housing development in Penllergaer should be resisted and that the proposed one thousand new homes can be successfully and more appropriately accommodated elsewhere.