



# CDLI Abertawe Swansea LDP 2023-2038



Cyngor **Abertawe**  
**Swansea** Council

## SWANSEA LOCAL DEVELOPMENT PLAN 2023-2038 (LDP2)

### PRE-DEPOSIT PLAN (PREFERRED STRATEGY)

#### Integrated Sustainability Appraisal (ISA) Report Non-Technical Summary

December 2024

Mae'r ddogfen hefyd ar gael yn Gymraeg / This document is also available in Welsh

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## 1.0 INTRODUCTION

- 1.0.1 This document is the Non-Technical Summary of the Integrated Sustainability Appraisal (ISA) Report of the Swansea Local Development Plan 2023-2038 (known as LDP2) Pre-Deposit Plan (henceforth known as the 'Preferred Strategy'). LDP2 covers the whole County and will contain policies used to determine planning applications and once adopted, will replace 'Swansea LDP 2010-2025'. The Preferred Strategy sets the strategic direction, overarching vision, objectives and strategic policies from which the detailed plan (the 'Deposit') will be developed.
- 1.0.2 The purpose of the ISA is to identify the likely significant economic, environmental and social effects of LDP2 and to suggest relevant mitigation measures. The ISA Report follows guidance contained in the LDP Manual<sup>1</sup>. Figure 1 outlines the main ISA tasks and each stage of LDP2. Comment and feedback at each stage allows the potential sustainability implications of the Plan to be considered and changes made, if necessary. The outcome of the ongoing iterative appraisal has informed the Preferred Strategy. The Council, as the 'Responsible Authority', has undertaken the Sustainability Appraisal (SA) process in-house.
- 1.0.3 The non-technical summary provides an overview of the findings of the ISA of the Preferred Strategy. The full ISA Report<sup>2</sup> and appendices present the appraisal findings in full. The Report accompanies, and should be read in conjunction with, the Preferred Strategy December 2024<sup>3</sup>. Both documents are published for public consultation, during which time representations can be made in relation to the contents of the ISA Report and/or the Preferred Strategy. All representations made will be considered and taken into account and changes made where considered necessary.
- 1.0.4 Public consultation on the LDP2 Preferred Strategy, Candidate Site Register, Habitat Regulations Assessment and Integrated Sustainability Appraisal will occur between February and April 2025. Details can be found here: [Swansea Local Development Plan 2023-2038 \(LDP2\) - Swansea](#).

### 1.1 LEGISLATIVE REQUIREMENTS AND LINKS TO OTHER STRATEGIES AND ASSESSMENTS

- 1.1.1 LDP's have a key role in delivering sustainable development. The requirement to carry out a Sustainability Appraisal (SA) of LDP2 is set out in the Planning and Compulsory Purchase Act 2004 (S62(6)), the Town and Country Planning (LDP) (Wales) Regulations 2005 (as amended) and associated guidance. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) sets out a mandatory requirement to carry out strategic environmental assessment (SEA) on all development plans and the legal assessment process that must be followed (implementing the European (SEA) Directive).
- 1.1.2 The ISA combines the regulatory requirements for SEA and SA. The ISA Report also considers the following Acts, strategies and assessments:

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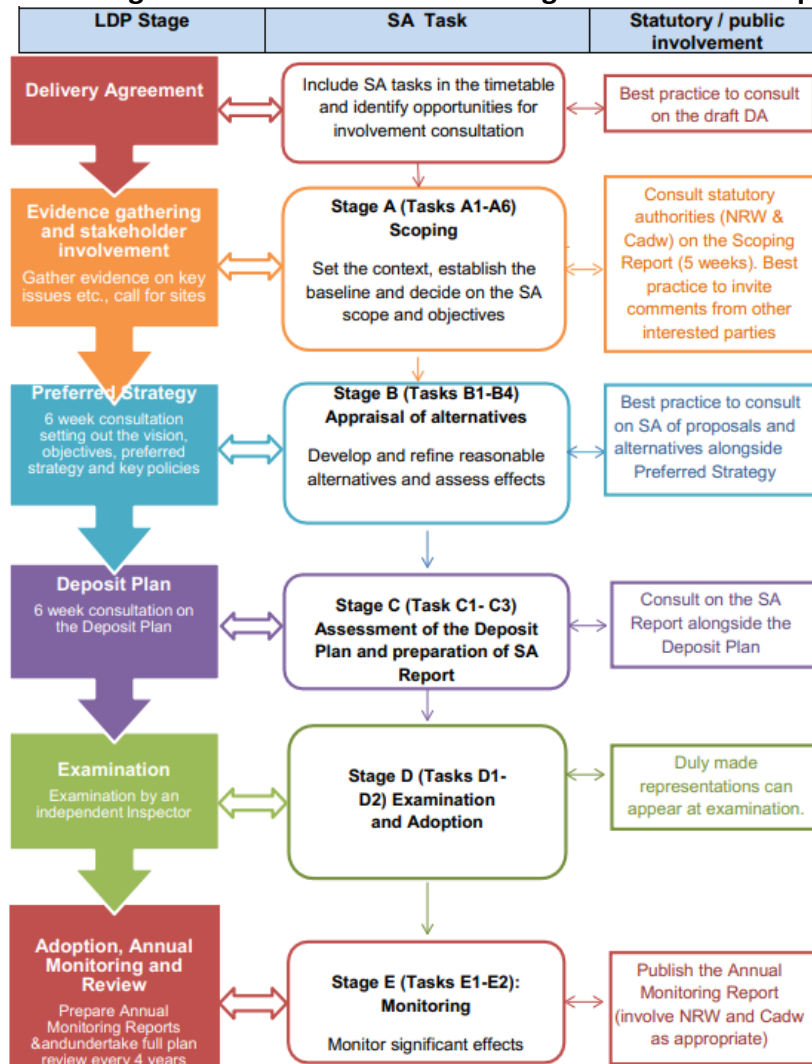
<sup>1</sup> [Development Plans Manual \(Edition 3\) March 2020 | GOV.WALES](#)

<sup>2</sup> [Local Development Plan 2 - Integrated Sustainability Appraisal and Habitats Regulations Assessment - Swansea](#)

<sup>3</sup> [Preferred strategy - Swansea](#)

- Equality Act 2010<sup>4</sup> (an equalities impact assessment)
- Well-being of Future Generations Act (WBFGA) 2015<sup>5</sup>
- Environment (Wales) Act 2016<sup>6</sup>
- Public Health (Wales) Act 2017<sup>7</sup> (Health Impact Assessment (HIA))
- Planning and Compulsory Purchase Act 2004 (as amended by Section 11 of the Planning (Wales) Act 2015<sup>8</sup>, the Welsh Language Standards (No.1) Regulations 2015<sup>9</sup>, TAN 20 and PPW 12<sup>th</sup> Edition Technical Advice Note (TAN) 2017: Planning and the Welsh Language (a Welsh Language Impact Assessment)).

**Figure 1 Main Stages of the LDP Process and Integration with SA Requirements**



<sup>4</sup> [Equality Act 2010](#)

<sup>5</sup> [Well-being of Future Generations \(Wales\) Act 2015 \(legislation.gov.uk\)](#)

<sup>6</sup> [Environment \(Wales\) Act 2016](#)

<sup>7</sup> [Public Health \(Wales\) Act 2017](#)

<sup>8</sup> [Planning \(Wales\) Act 2015 \(legislation.gov.uk\)](#)

<sup>9</sup> [www.legislation.gov.uk/wsi/2015/996/contents/made](http://www.legislation.gov.uk/wsi/2015/996/contents/made)



- 1.1.3 As well as the Acts and policies listed above, the SEA Regs (12(3)) require the ISA to have regard to **plans, policies and programmes**<sup>10</sup> (PPP) that contain relevant environmental protection objectives and policies (Task 1). The list of PPP is in the Appendices of the full ISA Report of the Preferred Strategy.
- 1.1.4 A separate Habitats Regulations Assessment (HRA) required under the Conservation of Habitats and Species Regulations 2017<sup>11</sup> (as amended by the EU Exit Regulations 2019) (Habitats Regulations) has been prepared. A Shadow HRA Stage 1 Screening Report of the Preferred Strategy has been undertaken and concludes that elements of the Preferred Strategy that have the potential to result in likely significant effects (LSE) upon the integrity of one or more Internationally Designated Sites' conservation objectives; and thus an appropriate assessment needs to be undertaken. The appropriate assessment will take place during preparation of the Deposit Plan.

## 1.2 HOW THE COUNCIL HAS COMPLIED WITH THE REGULATIONS

- 1.2.1 The LDP2 draft ISA Scoping Report was published for consultation in 2023 (Stage A) and subsequently amended<sup>12</sup>. The revised version was published in July 2024<sup>13</sup>.
- 1.2.2 Draft versions of the LDP2 Vision and Objectives were published for public consultation between April and June 2024 and subject to a high level assessment against the ISA Framework (see section 4 below). This was a non-statutory stage but nevertheless was subject to high level ISA assessment as part of the comprehensive and iterative ISA process for LDP2. The Vision and Objectives have since been amended and are presented in section 6 below.
- 1.2.3 The full ISA Report of the Preferred Strategy complies with Stage B (and fulfils the requirements of SEA Regulation 12(1)) and contains:
- **B1 An assessment the Preferred Strategy objectives against the SA framework and suggested mitigation**
  - **B2: Consideration of a number of reasonable alternatives** - strategic options for both growth and spatial distribution.
  - **B3: An assessment of the alternatives against the SA Framework and mitigating effects and opportunities identified.**
  - **B4 An evaluation of the effects of the LDP options.** Reasons for the selection of the Preferred Strategy and discarding of other alternatives are presented. The LDP2 Preferred Strategy is assessed against the ISA Framework and Strategic Policies are presented and assessed against the ISA Framework.

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<sup>10</sup> SEA Regulations 12(3) Schedule 2(1) and (5).

<sup>11</sup> [The Conservation of Habitats and Species and Planning \(Various Amendments\) \(England and Wales\) Regulations 2018 \(legislation.gov.uk\) and www.legislation.gov.uk/uksi/2019/579/contents/made](https://www.legislation.gov.uk/uksi/2019/579/contents/made)

<sup>12</sup> [https://www.swansea.gov.uk/media/18172/Integrated-Sustainability-Appraisal-ISA-Scoping-Consultation-Response-Report---April-2024/pdf/7jIntegrated\\_Sustainability\\_Appraisal\\_ISA\\_Scoping\\_Consultation\\_Response\\_Report\\_-\\_April\\_2024.pdf?m=1721121264027](https://www.swansea.gov.uk/media/18172/Integrated-Sustainability-Appraisal-ISA-Scoping-Consultation-Response-Report---April-2024/pdf/7jIntegrated_Sustainability_Appraisal_ISA_Scoping_Consultation_Response_Report_-_April_2024.pdf?m=1721121264027)

<sup>13</sup> [https://www.swansea.gov.uk/media/18171/Integrated-Sustainability-Appraisal-ISA-Scoping-Report---April-2024/pdf/64Integrated\\_Sustainability\\_Appraisal\\_ISA\\_Scoping\\_Report\\_April\\_2024.pdf?m=1721121193213](https://www.swansea.gov.uk/media/18171/Integrated-Sustainability-Appraisal-ISA-Scoping-Report---April-2024/pdf/64Integrated_Sustainability_Appraisal_ISA_Scoping_Report_April_2024.pdf?m=1721121193213)

1.2.4 The publication of this non-technical summary report for consultation complies with SEA Regulation 12(3), Schedule 2(10).

## 2.0 METHODOLOGY

### 2.1 THE ISA OBJECTIVES AND INDICATORS (THE SUSTAINABILITY FRAMEWORK)

2.1.1 The Sustainability Framework (ISA Framework) was developed within the ISA Scoping Report in consultation with the SEA Consultation Bodies (Natural Resources Wales and Cadw) alongside input from other stakeholders (e.g. Public Health Wales). The 16 ISA objectives reflect issues highlighted within the Scoping Report and are presented in Table 2. They are used to assess the sustainability of the Plan's strategy, policies and proposals. Each objective has indicators and 'decision making criteria' to provide consistency throughout the LDP2 process. In some cases, the decision-aiding questions differ between the assessment of candidate sites and plan policies due to the different issues encountered<sup>14</sup>. Both are included within the Appendices of the full ISA Report. Indicators may change as the LDP2 progresses and new sources of information emerge.

2.1.2 ISA objective 14, relating to the cultural environment, was amended following informal consultation to have a standalone objective relating to the Welsh language. The objectives include economic and social objectives (including health and wellbeing), and objectives addressing the topics listed in the SEA Regulations, S2(6) and the interrelationship between them. These are:

Biodiversity	Flora	Fauna
Population	Air	Soil
Human health	Climatic factors	Material assets
Landscape	Water	
Cultural heritage (including architectural and archaeological heritage)		

2.1.2 The ISA objectives align with requirements of the legislation outlined within section 1.1.2 above and the South West Wales Area Statement Themes. The alignment is shown in Table 3 in the full ISA Report.

### 2.2 DETERMINING EFFECT SIGNIFICANCE

2.2.1 Schedule 1(2) of the SEA Regs (Annex II of the SEA Directive) sets criteria for the determination of likely significant effects and of the area likely to be affected:

- (a) probability, duration, frequency and reversibility of the effects;
- (b) cumulative nature of the effects;
- (c) transboundary nature of the effects;
- (d) risks to human health or the environment;
- (e) magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

<sup>14</sup> <https://www.gov.wales/sites/default/files/publications/2020-03/development-plans-manual-edition-3-march-2020.pdf>

- (f) value and vulnerability of the area likely to be affected due to —
- (i) special natural characteristics or cultural heritage;
- (ii) exceeded environmental quality standards or limit values; or
- (iii) intensive land-use; and
- (g) effects on areas or landscapes which have a recognised national, Community or international protection status.

2.2.2 This involves predicting changes to the environmental baseline as a result of the plan, and the alternatives examined.

### 2.3 ASSESSMENT MATRICES

2.3.1 The likely impacts of components of LDP2 are scored on a scale, and supplemented by commentary explaining the rationale for the score (Table 1). A summary of the ISA scoring for each stage of the Preferred Strategy can be viewed in Chapters 5-7 below and is detailed within the full ISA Report, where the score sheets are within the Appendices.

**Table 1: Scoring Chart**

Symbol	Predicted effect	Suggested action/response
++	Likely to have very positive affects compared to current situation.	Consider any further enhancement measures.
+	Likely to have positive affects compared to current situation.	Consider any further enhancement measures.
+/-	Range of positive and negative affects compared to current situation.	Consider whether mitigation for negative effects and or enhancement for positive effect could change score.
-	Likely to have a negative affect compared to current situation.	Consider mitigation measures: first avoidance of the impact, then reduction of impact, and finally compensation for the impact (e.g. delete/reconsider/amend the policy or site allocation). Reconsider policy/proposed use.
--	Likely to have a very negative effect compared to current situation.	Consider mitigation measures to reduce the severity of the effect, but these are likely to be difficult and/or expensive. Reconsider the policy or proposed use.
I	Effect depends on how the policy and allocation are implemented.	Suggestions for implementation.
?	Unknown at this stage.	More information is required. Consider where the information could be sourced? How and when it could be collected.
x	Not applicable.	Reason is explained.
0	Neutral effect compared to the current situation.	Consider whether intervention could bring positive effects.



**Table 2: ISA Objectives**

SEA Topic		ISA Objective
1	Biodiversity and Geodiversity	<i>Maintain and enhance biodiversity and geodiversity resources, including protected habitats and species; enhance ecosystem resilience, green infrastructure provision and habitat connectivity</i>
2	Housing and Placemaking	<i>Enable people to meet their housing requirements by providing sufficient good quality and affordable housing in sustainable locations, which deliver the principles of Placemaking</i>
3	Equality and Social Exclusion	<i>Encourage an inclusive society by tackling social exclusion, promote equality of opportunity, reduce socio-economic disadvantage and promote cohesive and resilient communities.</i>
4	Economic Growth	<i>Diversify and strengthen the County's economy, increase the number of employment opportunities and improve education and skill levels while supporting the role of the County in the City Bay Region and National Growth Area (NGA).</i>
5	Health and Wellbeing	<i>Create, maintain and enhance social and physical environments that encourage and support health, well-being and community safety and deliver Placemaking principles.</i>
6	Protecting Soil Resources	<i>Ensure land is used sustainably by protecting BMV agricultural land and carbon rich soil.</i>
7	Water	<i>Protect and enhance the quality of inland and coastal water environments, and the quantity and quality of water resources.</i>
8	Air	<i>Reduce emissions and concentrations of harmful atmospheric pollutants and reduce exposure to poor air quality.</i>
9	Air	<i>Reduce the need to travel through the design of new development, the inclusion of active travel infrastructure and its location close to active travel and public transport networks</i>
10	Climate Change	<i>Ensure all development adopts appropriate avoidance, adaption and mitigation measures to reduce and respond to the impacts of climatic change and reduce the risk of flooding.</i>
11	Renewable and Low Carbon Energy	<i>Facilitate the development of renewable and low carbon energy resources in the design of new developments and generation; and infrastructure proposals are located in appropriate locations</i>
12	Waste	<i>Encourage the circular economy, manage waste in a sustainable manner.</i>
13	Managing Natural Resources	<i>Ensure natural resources are protected and/or safeguarded and where their use is necessary, they are used sustainably to provide an adequate supply of minerals and materials for construction and other uses.</i>
14	Historic and Cultural Heritage (including Welsh language)	<i>Protect and enhance the quality of the historic and cultural environment and assets of the County.</i>
15	Landscape	<i>Maintain and enhance the quality, character and distinctiveness of the landscape, townscape, Heritage Coast and seascape. Ensure the nationally protected Gower National Landscape AONB is conserved and enhanced.</i>
16	Welsh Language	<i>Protect, promote and enhance the use of the Welsh language as an important element of the social and cultural fabric of the County'.</i>

## 2.4 TIMESCALES

2.4.1 The SEA Regs (Sch2(6)) require the analysis of effects to include ‘*short, medium, and long-term, permanent, and temporary and secondary, cumulative and synergistic effects*’. Effects may vary over different timescales, e.g., adverse short-term effects but beneficial long term. Given the 15 year timescale of LDP2 (2023-2038) the ISA considers the following timescales:

- Short Term: 0 – 5 years;
- Medium Term: 6 – 10 years;
- Long Term: 11 – 20+ years (particularly relevant for air pollution and climate change).

2.4.2 Table 3 outlines the definition of secondary (or indirect), cumulative and synergistic effects, as considered in this ISA.

**Table 3 Definitions of Secondary, Cumulative and Synergistic Effects. Adapted from A Practical Guide to the Strategic Environmental Assessment Directive, ODPM (2005).**

Type of Effect	Definition
Secondary (or indirect)	Effects that are not a direct result of the plan but occur away from the original effect or because of a complex pathway.
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g., noise, dust and visual) have a combined effect.
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.

Source: Carmarthenshire ISA Report 2<sup>nd</sup> Deposit rLDP, 2023

## 2.5 MITIGATION

2.5.1 The ISA Report recommends reasonable and deliverable mitigation measures if significant negative effects are predicted. The identification of mitigation measures is a key stage of SA which has a direct influence on the outcome of the plan. The recommendations follow the mitigation hierarchy of avoidance, reduction or compensation of the impact.

### 3.0 COUNTY'S ENVIRONMENTAL BASELINE AND PREDICTED EFFECTS WITH AND WITHOUT PLAN

3.0.1 This section summarises the environmental, economic, and social baseline condition of the County (Task A3), key issues identified and a commentary on the likely predicted effect on the environmental baseline, both with and without the implementation of LDP2. (SEA Regs Annex I b and c). This information is presented in full in the Appendices of the full ISA Report.

#### 3.1 BIODIVERSITY, SOIL AND GEODIVERSITY (Summary and update since April 2024)

3.1.1 NRW's South West Wales Area Statement highlights the LDP as a key opportunity to enhance biodiversity. The County contains international, national and locally designated sites, including marine sites, (Table 4) and approx. 21% of the County is statutorily designated for nature, this increases to 43% if non statutory designations are included. Protected sites, including non statutory SINC sites, tend to have the highest levels of ecosystem resilience, the urban areas (particularly the city centre) tend to have the least. NRW 's 2020 Baseline Evaluation<sup>15</sup> project assessed the quality of protected sites (SACs, SPAs and SSSIs) and concluded that there was insufficient evidence to determine the condition of around half of the features on those sites. The condition of these sites provides some indication as to the health of the broad habitats across the county and region.

3.1.2 The County's coastline abuts many nationally and internationally designated areas and the marine environment and Swansea's coastline is home to a wide variety of habitats and species which are at risk from both landward and seaward pressures including climate change, development and pollution.

**Table 4: Ecologically designated sites in Swansea**

Number	Designated Site
2	Ramsar Wetlands of International Importance
7	Special Areas of Conservation (SACs)
2	Special Protection Areas (SPAs)
36	Sites of Special Scientific Interest (SSSIs)
4	National Nature Reserves (NNRs)
6	Local Nature Reserves(LNRs)
154	Sites of Importance for Nature Conservation (SINCs)
43	South and West Wales Wildlife Trust Reserves

3.1.3 The Council declared a Nature Emergency in 2021 under Section 6 of the Environment (Wales) Act 2016 and has a statutory duty to maintain and enhance biodiversity in the exercise of its functions. The Council's Section 6 Biodiversity and Resilience of Ecosystems Duty Action Plan (Section 6 Action Plan) 2023-2025 (2024)<sup>16</sup> prioritises key actions for the

<sup>15</sup> [Natural Resources Wales / Protected sites baseline assessment 2020](#)

<sup>16</sup> <https://democracy.swansea.gov.uk/documents/s100526/10%20of%203%20S6-action-plan-FINAL.pdf?LLL=0>



**Figure 3: GI Zones and Interconnectivity**



Source: Swansea GI Assessment, Stage 1, December 2024, EDP and Swansea Council

- 3.1.5 The County has some 1721ha of ancient woodland (GIA) and higher than average canopy cover at 17%<sup>19</sup>. The GI Strategy of Swansea Central Area, 2021<sup>20</sup>, seeks to double GI in this area (from 13% to 26%) by 2030 and increase tree canopy cover to 20-25% by 2044.
- 3.1.6 The County contains a variety of soil types, and some areas of peatlands (most significantly Crymlyn Bog SAC and Oxwich SSSI/Local NR). The Council's Climate Change and Nature Strategy 2022-2030<sup>21</sup> requires '*LDP policy to be reviewed to protect land soils and habitats rich in carbon*'. Much of the County is agricultural, however only approx. 16% of land is graded Best Most Versatile (BMV) Agricultural land, which is a finite resource. There is no Grade 1 BMV agricultural land within the County.
- 3.1.7 The County contains important geological features, with 9 Regional Important Geological Sites (RIGS) sites, 17 potential RIG sites and 19 SSSI's have geological interest.

<sup>19</sup> [Tree Cover in Wales' Towns and Cities \(full report\) \(naturalresources.wales\)](https://naturalresources.wales/)

<sup>20</sup> [https://www.swansea.gov.uk/media/2806/Swansea-Central-Area---Regenerating-Our-City-for-Wellbeing-and-Wildlife/pdf/kaSwansea\\_Central\\_Area\\_-\\_Regenerating\\_Our\\_City\\_for\\_Wellbeing\\_and\\_Wildlife.pdf?m=1630579261377](https://www.swansea.gov.uk/media/2806/Swansea-Central-Area---Regenerating-Our-City-for-Wellbeing-and-Wildlife/pdf/kaSwansea_Central_Area_-_Regenerating_Our_City_for_Wellbeing_and_Wildlife.pdf?m=1630579261377)

<sup>21</sup> [Climate Change and Nature Strategy 2022-2030 - Swansea](#)

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
<i>Welsh Government and Council commitment to 30 x 30 global biodiversity target to inform decision making.</i>	County-wide	<p>Future development would have to comply with Future Wales, PPW and relevant legislation relating to biodiversity, statutory protected sites, soils, climate change and GI. Without an up to date statutory local development plan, the most up to date national planning policy in respect of GI, climate change and biodiversity net gain, guided by a strategic GIA wouldn't inform the local policy framework to guide the location of development. New developments may occur in an uncoordinated and unplanned manner, with pressure for greenfield releases. The location of developments will not be informed by a county wide GIA, nor consider the cumulative impacts of developments.</p> <p>The Council's adopted SPG, including for example those relating to Biodiversity and Trees, require an up to date local policy framework to be in place to have material weight for decision making.</p>
<i>Statutorily designated sites to be protected from damage in-line with national policy and relevant legislation.</i>	County wide and cross county boarder designations	
<i>Deliver net biodiversity enhancement as part of new development.</i>	County wide	
<i>Avoid wherever possible development that would adversely affect non-statutory designated sites.</i>		
<i>Facilitate the restoration and creation of habitat and GI in urban and peri-urban areas, to increase equality of access to good quality semi-natural green and blue spaces and the associated well-being benefits.</i>	Countywide	<p>Designated sites, protected habitats and species will be safeguarded through legislation. Welsh Government policy and legislation, for example PPW, Future Wales, and S6 Duty will still apply as would the LNRAP. However, measures to reach the LNRAP target of 30% of Swansea protected and effectively managed for nature by 2030 would be more effectively facilitated via an up-to-date local planning framework. PPW and Future Wales biodiversity enhancement policies and seeking the control of INNS would still apply, but in the absence of an up to date local planning framework and SPG measures to secure biodiversity enhancement and nature recovery as part of development will not be as effective</p> <p>Lack of an up-to-date LDP spatial strategy may lead to uncoordinated piecemeal development and the loss of wildlife corridors and networks. The ecosystem resilience map and GIA will inform the LDP spatial</p>
<i>Help minimise loss and increase connectivity in key wildlife corridors and networks throughout Swansea to reduce the effects of habitat fragmentation resulting from urban</i>	County wide	



<i>growth and historic land use impacts.</i>		strategy in order to ensure ecosystem resilience is embedded in the LDP2 policies. NRW's South Wales Area Statement highlights LDPs as a key opportunity to enhance biodiversity.
<i>Support the reduction of the spread of Invasive Non Native Species.</i>	County wide	Each development proposal that could impact on a European site would require a separate Habitat Regulations Assessment (HRA), which would need to look at all potentially affected European sites and cumulative impacts. This would significantly delay the planning application process and could lead to inconsistent assessments without fully considering potential cumulative effects.
<i>Give considerable weight to protecting Grades 1-3a agricultural land from development, which is mainly located within the Gower AONB.</i>	Areas of agricultural land within the County, graded 1-3a	There wouldn't be locally specific local planning policy to positively manage non-statutory sites. Without LDP2, the GIA and associated targets will have little material weight. The LDP2 spatial strategy and policies will not have been informed by the GIA.
<i>Encourage reuse of brownfield land, where it is suitable for development, and follow the search sequence for new development land set out in national planning policy.</i>	Brownfield (previously developed land) within the County	PPW encourages use of brownfield land over greenfield. The LDP provides a mechanism to assess sites and the impacts of developing sites in a wider context, ensuring wider placemaking considerations.
<i>Help meet Council target to double GI in Swansea Central Area to 26% by 2030 and tree canopy to 20-25% by 2044.</i>	Defined central Swansea Area	Without LDP2 and associated evidence, the development of local GI policy will not be informed by objectives within the Swansea Central Area GIA and the county wide GIA. LDP2 will provide a comprehensive framework to assess decisions to help facilitate the meeting of targets.
<i>Afford protection to ancient woodland from development that would result in loss/deterioration, and support an increase in canopy cover throughout the County.</i>	Designated areas of ancient woodlands throughout the County, new woodland planting throughout the County	Without LDP2 and associated SPG and evidence such as the countywide GIA, there will be less of a coordinated and comprehensive approach to woodland protection and the increase in canopy cover throughout the County.  The Council's adopted Trees, Woodlands and Hedgerow SPG requires an up to date local policy framework to be in place in order to have material weight for decision making.
<i>Facilitate sustainable use of marine natural resources, particularly within the Marine Protected Area's.</i>	Coastal and offshore areas of the county, influenced by the land use planning system. Marine	PPW seeks to ensure that land use planning approaches in coastal areas are environmentally and economically sustainable, socially equitable and recognise the threat posed by the climate emergency. Development plans must align with the Welsh National Marine Plan. Without LDP2 there will be no local decision-making framework to assess developments

	Protected Areas (SACs, SPAs, Ramsar, SSSIs identified within the Marine Protected Area Network Management Framework for Wales.	<p>which may impact upon marine natural resources, individually and cumulatively.</p> <p>A statutory land use planning framework can provide material weight to documents such as the Seascape Assessment and Shoreline Management Plan. The Placemaking Guidance for the Gower AONB SPG, together with associated background evidence documents, require an up to date local policy framework in order to have material weight.</p>
Protect coastline from inappropriate development and consider the consequential impacts of climate change on the coastline and coastal environments.	The County's coastal areas	
Protect peat soil resources.	Areas of peat soil within the County	The Council's 'Climate Change and Nature Strategy 2022-2030' specifically requires: ' <i>LDP policy to be reviewed to protect land soils and habitats rich in carbon</i> '.
Support improvement of the quality of Swansea's air and water (sea and fresh water) resources.	County wide and particularly within areas identified as requiring improvement.	<p>Development will usually have some impact on air quality (positive or negative) and 2021 showed no exceedences of NO<sub>2</sub>, PM10, PM2.5, SO<sub>2</sub> or O<sub>3</sub> in the County. Development, cumulatively or individually, which may have a negative impact upon the air quality within the County's AQMA either directly or indirectly, may not be controlled. Without LDP2 development has to comply with relevant legislation. However, LDP2 can promote a development strategy that seeks to reduce the need to travel and maximise walking and cycling to minimise air pollution, help coordinate development and take account of cumulative impacts of development.</p> <p>Surface and ground waters can be directly and indirectly impacted by development.</p>

**General comment:**

The baseline scenario is likely to be a worsening one when considered against ISA objectives. Short term detrimental impacts can range from initial site clearance impacting on soils and flora and fauna, air (such as dust) and noise pollution from development. This is also true of brownfield sites which may be ecologically rich. Without a spatial strategy, uncoordinated developments may not be in the most connected and sustainable places which promote the objective of reducing the need to travel, and once built, may indirectly result in increased traffic in the medium and long term within the AQMA. Medium term targets (such as 30 by 30) may be

difficult to meet if development is not coordinated. Potential long term ecological and health and wellbeing benefits will be realised if increased GI is embedded into the landscape, however long term maintenance is necessary, however without a coordinated approach to facilitate improvements in strategic ecological connectivity across the County then long terms benefits are unlikely to be as effective as that underpinned by a GI focussed spatial strategy. Without the LDP2 and coordinated development there may be both short and medium pressure on greenfield sites, leading to uncoordinated developments which may cumulatively impact on nature networks and GI pathways/linkages in the long term. Implementation of SUDs should have immediate benefit in terms of surface water run off, leading to long term improvements in surface water drainage and the condition of surface and groundwaters.

### **3.2 POPULATION (INCLUDING Equalities, Housing and Education) (Summary and update since April 2024)**

#### Population

- 3.2.1 The Office For National Statistics (ONS) estimate that in 2023<sup>22</sup> the population of the County was 246,700 people, an increase of 4,700 (1.9%) from 2022, comprising of 124,100 females and 122,600 males. Some 0.4% of the County's population age 16 and over said the gender they identified with is not the same as that registered at birth (Census 2021). The population increase is due to both internal (UK based migration) and international migration<sup>23</sup>. Since 2013 the County's population has been getting older and over 20% of people living in the County are now over 65 (a 10% rise since 2013). At the same time the total working age (16-64) population in Swansea has only increased by 1.7%. There is a reduction in population in the 0-5 age group, reflecting lower conception rates, live birth rates and fertility rates.
- 3.2.2 The 2021 Census showed that just over 41% of the County's population was married or in a registered civil partnership. In common with many urban areas and university cities, Swansea has a higher proportion of single adults (39.9%) (never married or in a registered same-sex civil partnership) than equivalent Welsh average (37.2%). Some 3.4% of the County's residents aged 16 or over identify as LGBTQ+ compared to 2.7% in Wales (Census 2021).
- 3.2.3 Just over 40% of Swansea's population identified as Christian (2021 Census) with the number of people affiliated with another religion increasing between 2011 and 2021; the largest being Muslim, Buddhist and Hindu respectively. The number of people stating they had no religion increased significantly between the 2011 and 2021 Census (+39%). The County has a higher proportion of people in non-white ethnic groups (8.6%) than the Wales average and the largest group is 'Bangladeshi' (around 2,900 people or 1.2%, Census 2021).

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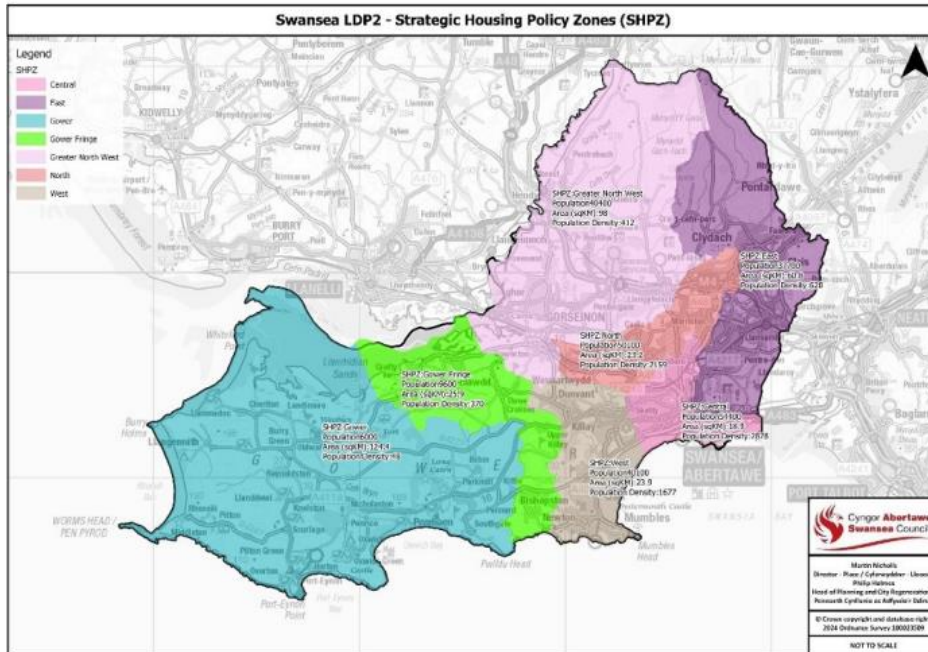
<sup>22</sup> [https://www.swansea.gov.uk/media/3252/Swansea-Population-2023/pdf/soSwansea\\_Population\\_2023\\_Jul-24.pdf?m=1721836599843](https://www.swansea.gov.uk/media/3252/Swansea-Population-2023/pdf/soSwansea_Population_2023_Jul-24.pdf?m=1721836599843)

<sup>23</sup> [https://www.swansea.gov.uk/media/3270/Recent-Population-Change-in-Swansea-to-2023/pdf/1eRecent\\_Population\\_Change\\_in\\_Swansea\\_to\\_2023.pdf?m=1722261786867](https://www.swansea.gov.uk/media/3270/Recent-Population-Change-in-Swansea-to-2023/pdf/1eRecent_Population_Change_in_Swansea_to_2023.pdf?m=1722261786867)

## Housing and households

3.2.4 There were 105,000 households in Swansea (7.8% of the total Welsh households) in March 2021 (Census 2021) a 1.5% increase on the 2011 Census figure of 103,500. The LDP has seven defined Strategic Housing Policy zones (Figure 4), based on defined Housing Market Areas (HMA's). The Central HMA has the most households (24,500) and Gower the least (c.2,600). The average household in Swansea contained around 2.22 residents.

**Figure 4: Map of Strategic Housing Policy Zones (SHPZ) in the County**



## Housing Need

- 3.2.5 The draft Local Housing Market Assessment (LHMA) 2023 estimates there is an overall additional net affordable housing need of 5,355 affordable homes over the 15 year plan period. The majority of the need (82%) is for social rent with the remaining need (18%) for intermediate housing. There is a significant need for single bedroom homes.
- 3.2.6 Over half of the people living alone in market housing in Swansea occupy a house with at least *three* bedrooms (Census 2021). Only 13% live in a one bedroom property. If existing occupancy trends persist, 57% of people accessing market housing could need at least three bedrooms, 32% need two bedrooms and 10% one bedroom dwellings.
- 3.2.7 The Gypsy Traveller Accommodation Assessment (GTAA) 2022<sup>24</sup> finds that the accommodation requirements for Gypsy Travellers and Show people (as identified in the GTAA) will be met through the provision of additional pitches on sites that have relevant planning consents and/or appropriate lawful use for such development. There is no unmet need for pitches requiring additional land to be allocated. The existing lawful Travelling Showpeople site at Gorseinon has capacity to accommodate any additional pitches needed.

<sup>24</sup> [Gypsy & Traveller Accommodation Assessment](#)

## Tenure

- 3.2.8 Over 87.3% of people on Gower own all, or a share of, their homes. It is thought this is due to the older age of the people living there. It, along with the Gower Fringe, also has the lowest number of dwellings available for private rent (and highest rental prices) and the lowest amount of social rented dwellings. The Central area has a high number of students living there and has the lowest rate of homeownership (42.4%) but the largest number of privately rented houses.
- 3.2.9 Some 20,050 households in the County live in the social rented housing sector (Census 2021). Demand for social housing remains high with insufficient supply but there has been a gradual increase in the number of Council properties to rent (13,766 Council properties in March 2024, compared to 13,530 in March 2020). The Council, in conjunction with Registered Social Landlord (RSL) partners have targets to develop 5,000 units of new affordable housing in Swansea over a 10-year period (1,000 to be delivered by the Council through direct building programme, 4,000 to be delivered by Housing Associations).

## HMOs

- 3.2.10 There are estimated some 2,000 HMOs in Swansea, not all of them licensed<sup>25</sup>. Within the HMO Management Area, 24.1% of all houses are HMO's, just under the 25% threshold.

## Homelessness

- 3.2.11 Over the last 4 years Swansea has experienced a year-on-year increase in the number of homeless people, peaking at just under 4,500 in 2023/24. This is approximately a 50% rise compared to 5 years ago.

## Sales Prices

- 3.2.12 In May 2024<sup>26</sup> the average house sale price in the County was £202,116, (compared to £202,940 in November 2022 which was the highest ever average price in the County). Long term trends show an increase in the average price between 2012 and 2022 in the Gower Fringe of 67% and the North 65%. The smallest increase was in the City centre and surrounds at 36%. Gower has consistently had the highest average prices over the last ten years, from £350,000 in 2016 to £450,000 in 2022.

## Links with Neighbouring Local Authorities

- 3.2.13 The 2021 Census shows that the majority of people (68%) who bought a house in the County in 2020 already lived here and were moving home within the County. People also moved from Neath Port Talbot (7%) and Carmarthenshire (5%).

## Housing Delivery

- 3.2.14 The LDP Annual Monitoring Report (AMR)<sup>27</sup> shows how many dwellings have been built per year in the County since the adoption of the LDP (384 in 2023/24; 363 in 2022/23; 374 in 2021/2022; 446 in 2020/21; and 397 in 2019/20). The majority of new homes have been built in the north, north west and west of the County (Analysis of Housing Supply Paper,

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<sup>25</sup> [www.swansea.gov.uk/hmoregister](http://www.swansea.gov.uk/hmoregister)

<sup>26</sup> [https://www.swansea.gov.uk/media/15958/Table-13-House-prices/doc/4hTable\\_13.docx?m=1722953374347](https://www.swansea.gov.uk/media/15958/Table-13-House-prices/doc/4hTable_13.docx?m=1722953374347)

<sup>27</sup> [Planning delivery and monitoring - Swansea](#)

2024)<sup>28</sup>. Some 243 affordable homes were built in 2023/24, the majority of which are social rented.

3.2.15 The housing 'landbank' consists of housing sites of 10 or more houses with planning permission which have not been fully built out. At the time of writing 5,520 homes with planning permission had not yet been built. In addition, 53 houses were waiting for the developer to sign legal agreements before they could be built. If delays and developers not building sites with planning permission are taken into account the total landbank is considered to be 4,947 dwellings (Analysis of Housing Supply Paper, 2024).

#### Long Term Empty Properties

3.2.16 Properties that are empty for over six months (long term) are less likely to be returned to housing quickly and are not available to meet peoples housing needs. There were 2,052 long-term empty private sector properties in Swansea in 2023-24 compared to 2,700 in 2019.

#### Windfall sites

3.2.17 Just under 2,000 new dwellings (40%) between 2011/12 and 2023/24 were built on sites that were not actually allocated within the development plan. Since 2019, 324 new dwellings were built on sites of less than 10 houses.

#### Estimated Housing Delivery in LDP2

3.2.18 The Council's Analysis of Housing Supply Paper, 2024, estimates that the LDP will deliver **9,510** new dwellings over the plan period, equating to **634 dwellings per year**. Inclusion of a 20% flexibility allowance increases the figure to 11,412 dwellings (Analysis of Housing Supply Background Paper).

#### Education, Qualifications and Skills

3.2.19 Future school pupil numbers are predicted to fall within the County, in line with a falling birth rate. The wards of Killay South, Killay North<sup>29</sup>, Mawr, Mayals and Pennard have the fewest number of resident school aged children and Penderry, Llansamlet, Morryston, Cockett and Townhill have the most school aged children.

3.2.20 The majority of state school pupils attend English medium schools, followed by Welsh medium, faith schools and special needs schools. The existing LDP includes plans for four new state schools in: Garden Village, Penllergaer, Cefngyfelach and Pontarddulais. The Council aims to increase the number of year 1 pupils attending Welsh medium schools<sup>30</sup> to over 23% by 2032. The following areas are considered to lack Welsh-medium provision<sup>31</sup>:

- a. Gorseinon/Penllergaer
- b. Sketty/Dunvant/Killay
- c. Townhill/Mayhill/Waun Wen/Plasmarl
- d. St Thomas/Port Tennant.

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<sup>28</sup> [Swansea Local Development Plan 2023-2038 \(LDP2\) - Swansea](#)

<sup>29</sup> since May 2022 both form part of new Dunvant and Killay ward

<sup>30</sup> [https://www.swansea.gov.uk/media/1966/Swansea-WESP-2022--2032-final/pdf/diWESP\\_2022\\_2032\\_FINAL.pdf?m=1709890075437](https://www.swansea.gov.uk/media/1966/Swansea-WESP-2022--2032-final/pdf/diWESP_2022_2032_FINAL.pdf?m=1709890075437)

<sup>31</sup> [Agenda for Cabinet on Thursday, 15 February 2024, 10.00 am - Swansea](#)



3.2.21 The County has two sixth form colleges offering post-16 education and two Universities. Some 28,985 students (full and part time) attended the two universities in 2020/21. The 2021 Census shows that approx. 22,678 students aged 16 or above (17,954 aged 18+) lived in the County, with over half the students aged 18 and over lived in the Central HMA.

#### Qualification and Skill Levels

3.2.22 Fifty one percent of the County’s residents had qualifications at **Level 3 or above** (two or more A Levels or equivalents and above), whilst 32.8% of residents had **Level 4** or above qualifications (e.g. Higher National Certificate, Higher National Diploma, Degree or post-graduate qualifications) slightly higher than Wales (31.5%) and below England & Wales (33.8%). The number of people with **apprenticeships** as their highest qualification increased by around 3,000 or 36%. Almost one in five people aged 16 and over (18.9% or 37,300) reported having **no qualifications**, however, this figure has fallen by around 10,000 (21%) since the 2011 Census (Census 2021).

#### **Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
Identify the latest and most accurate data on demographic projections and changes in population (e.g. falling birth rates, drop in population aged 0-5 and 15-29 years, and ageing population) and future economic forecasts, which along with other relevant evidence will inform the number of people, homes and jobs to be planned for in LDP2.	Regional and countywide	Without LDP2 it will be difficult to ensure the housing needs of the County’s population with regard to housing types and locations of need, as evidenced within the LHMA, More Homes Programme and latest population forecasts will be met. This will impact on equalities and health and wellbeing issues, e.g. the ageing population of the County may have different housing needs and placemaking considerations. Uncoordinated housing development may put pressure on education and healthcare services with developments
Respond to the housing need across the County identified through an updated Local Housing Market Assessment.		

<p>Help meet the Council target for the delivery of 5,000 affordable homes between 2021-2031, including 1,000 new Council homes as part of the More Homes Programme.</p>		<p>unable to deliver Placemaking objectives, e.g., not being serviced by adequate community facilities, employment, retail and commercial provision.</p> <p>An integrated Housing and Employment strategy will ensure growth is sustainable. ie ensuring housing and employment is broadly aligned will ensure employment and housing needs are met without need for unsustainable out commuting.</p>
<p>Identify and monitor HMO concentrations and produce appropriate policy framework</p>	<p>In areas of the County identified as having high concentrations of HMO.</p>	<p>The HMO concentration areas are defined within LDP policy. A time expired LDP and underlying evidence does not allow the updating of local planning policy to address current issues regarding HMO's</p>
<p>Review the latest published Gypsy and Traveller accommodation need figures against supply and produce appropriate policy framework</p>	<p>County wide</p>	<p>A time expired LDP will not allow for the updating of the local planning policy context to ensures it addresses the latest evidenced need.</p>
<p>Collate and review evidence on any issues caused by Holiday accommodation/second homes/short term lets and produce appropriate policy framework</p>		<p>The number of residential dwellings being used as short term holiday lets rather than permanent residential dwellings has increased significantly since the adoption of the LDP and wider socio-economic impacts will remain unaddressed without an updated appropriate local policy framework that addresses current issues.</p>
<p><b>General comment:</b>  The baseline scenario is likely to be a worsening one when considered against ISA objectives.</p> <p>Without a planning framework to set targets for new housing, taking into account growth forecasts and demographic changes, the ability of the planning system to meet the long term needs of the County's population may not be met and may exacerbate the number of people commuting into the county for work from neighbouring authorities. Not enough supply of older peoples or affordable housing will not meet the current demand for housing and lead to a deteriorating long term situation with less people being able to access their housing needs. Without strategic decisions being made with regard to education provision there may be short term pressure on schools, increasing need to transport pupils with resultant pressure on highway networks and financial resources and inability to meet children's needs. Access to housing and employment are fundamental to help people's health and wellbeing and without addressing the issues, long term trends in social exclusion and inequality, health and wellbeing will continue.</p>		

### 3.3 ECONOMY (Summary and Update Since April 2024)

- 3.3.1 Future Wales identifies the ‘Swansea Bay and Llanelli’ National Growth Area (NGA) as the regional focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport; digital infrastructure; and investment. The Swansea Bay City Deal seeks to encourage up to £1.3 billion in investment and create over 9,000 jobs in the region. The South West Wales Energy Strategy 2022 estimates it will result in an additional 16,000 net jobs, with an increase in GVA of nearly £1.6 billion to 2035. The County has strong economic relationships with neighbouring local authorities, with one third of the people working in the County commuting in, the majority from Neath Port Talbot and Carmarthenshire. This commuting pattern influences the housing market, and also has links to air quality, climate change and infrastructure topics.
- 3.3.2 Swansea serves as a regional service centre, with higher proportions (than Wales and UK) of people employed in the service sector. Of the 110,000 people in employment within the County in 2022, 89.1% (98,000) were employed in the service sectors and of those 29.5% (32,400) worked within the public sector. The County also has a rural workforce and population and between 2011 and 2017 the number of farm businesses in the County increased, particularly specialist poultry and ‘other’ farm types. The visitor economy remains a key component of the County’s economy, with 4.7 million visitors to Swansea Bay in 2023 resulting in an economic impact of £609million and supporting 5,470 jobs<sup>32</sup>. A need has been identified for at least 3 new hotels within the City Centre, Copperworks and SA1 areas by 2026<sup>33</sup>. There has been a significant increase in the number of dwellings being used as short term holiday lets with hotspots in Gower, Mumbles and the Marina. Coincidentally, West Swansea and Gower have the highest house prices in the County, seen the biggest house price increases over recent years and have a lack of affordable housing. The cumulative landscape impact, particularly within the Gower Area of Outstanding Natural Landscape, of increasing numbers of purpose built short term let holiday accommodation units must be considered.
- 3.3.3 Some 23.7% of the County’s population were economically inactive in March 2023, a 17.7% increase since March 2022. The unemployment figure was lower in March 2024 than March 2023 with the wards of Townhill, Castle, Penderry and Landore having unemployment claimant count figures significantly above the Swansea average, whilst Mayals has the lowest rate. It is noticeable that Townhill, Penderry and Castle all contain Lower Super Output Areas (LSOAs) classed as amongst the most deprived in Wales. Some 76.3% of people are economically active, but this is 4% less than in March 2023.
- 3.3.4 The median full time annual wage of people in Swansea in March 2023 was £32,734 and the County’s estimated GVA in 2022 was approximately £5,800 million, £23,929 per head (3.5%

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<sup>32</sup> [Tourism research and statistics - Swansea](#)

<sup>33</sup> [https://www.swansea.gov.uk/media/16508/Swansea-Hotel-Demand-Study---Executive-Summary/pdf/d3Swansea\\_Hotel\\_Study\\_2023\\_-\\_Executive\\_Summary.pdf?m=1710329174573](https://www.swansea.gov.uk/media/16508/Swansea-Hotel-Demand-Study---Executive-Summary/pdf/d3Swansea_Hotel_Study_2023_-_Executive_Summary.pdf?m=1710329174573)

increase above the previous year), higher than Wales per head (£23,804) but lower than the UK figure (£32,996).<sup>34</sup>

3.3.5 The LDP2 Economic and Housing Growth Assessment Report, 2024<sup>35</sup>, sets out a range of demographic and jobs led growth scenarios that have been assessed to inform chosen levels of growth in the Preferred Strategy ranging from 7875 new jobs to 10238 new jobs between 2023 and 2038. The range of growth options generate a potential range of requirements for additional employment land of between 11-25ha within LDP2 in order to accommodate the new jobs dependant on the growth level pursued. New jobs are expected in the finance and business sectors whilst manufacturing will continue to decrease.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
Help maximise socio-economic benefits and potential of the Swansea Bay and Llanelli National Growth Area and the City Deal.	Regional and countywide	Future Wales sets out the National Growth Area, but requires a local vision for each city and/or town supported by a spatial framework that guides growth and regeneration. Without LDP2, this will not be delivered.
Facilitate the regeneration of Swansea Central Area in collaboration with development partners, focussing on key sites for delivery. Understand retail trends and impacts being experienced by retail centres in the County and facilitate regeneration projects and other measures to support their future vitality and viability.	Swansea Central Area, Countywide district and local centres and wider benefits throughout the County	Future leisure and retail developments will have to comply with Future Wales Town Centre’s first approach and adopt sequential tests, however there would be a lack of local strategy and coordination without LDP2. Developments would not be informed by an up to date evidence base in relation to town, district and local centres.
Swansea has a relatively high share of LSOAs in the 10% most deprived in Wales. Support economic growth and employment opportunities, and measures to tackle deprivation and inequality of access to employment, education and training.	Regional, countywide and locally focused.	The LDP will not be informed by up to date employment land study or associated regional and local regeneration strategies. Supporting evidence for LDP2 Preferred Strategy provides justification for the need of some 25.2ha of additional

<sup>34</sup> [https://www.swansea.gov.uk/media/3294/Swansea-Economic-Profile-January-2024/pdf/75Swansea\\_Economic\\_Profile\\_January\\_2024.pdf?m=1707124546403](https://www.swansea.gov.uk/media/3294/Swansea-Economic-Profile-January-2024/pdf/75Swansea_Economic_Profile_January_2024.pdf?m=1707124546403)

<sup>35</sup> [Swansea Local Development Plan 2023-2038 \(LDP2\) - Swansea](#)

<p>Ensure an adequate supply of fit for purpose and attractive commercial and industrial sites and premises across to Swansea to encourage business to invest and provide opportunities to grow the business base through quality new employment opportunities. There will be a need to understand the need and demand for commercial land (B uses), including the latest evidence and trends that have a bearing on the requirement for land for such uses e.g. rise of home working</p>		<p>employment land in order to accommodate the estimated employment growth.</p> <p>A coordinated spatial plan will help facilitate the transition to a low carbon economy, providing a framework for energy generation, storage and supply infrastructure</p>
<p>High proportion of residents work within the service and public sectors. Support growth of the identified priority employment sectors</p>		
<p>Interrelationship between quality of the natural environment (particularly landscape and beaches) and the attraction to visitors.</p>	<p>countywide</p>	<p>The interrelationship between the visitor economy and natural beauty of the County must be considered via spatial land use planning, which can consider cumulative impacts and wider issues associated with the visitor economy, including if there is any impact on the housing market.</p> <p>The latest tourism strategies will inform LDP2.</p>
<p>Importance of walking, cycling and other activities as part of the visitor economy and interrelationship with active travel routes, health and wellbeing and GI.</p>		
<p>Collate and review evidence on any issues caused by Holiday accommodation e.g. in Gower AONB. Collate and review evidence on use of properties as short term lets (e.g. Airbnb) adding to pressures on long term rental market and lack of availability of properties for local residents</p>		
<p><b>General Comment:</b></p> <p>Without LDP2 there is potential for the baseline scenario to be worsening when considered against ISA objectives, though the NGA in Future Wales and the City Deal will influence regional and local development opportunities.</p> <p>Potential short term impact of developments on biodiversity with long term benefits if effective mitigation is incorporated. Potential impacts in respect of the permanent sterilisation of soil resources if new development is on greenfield sites. Medium and long term increase in number of jobs in the County, increasing prosperity and socio economic benefits. Depending on the type of industries attracted, there may be potential to support the long term transition to a low carbon economy</p>		

### 3.4 HEALTH (INCLUDES AIR) (Summary and Update since April 2024)

- 3.4.1 Achieving good health and wellbeing embedded within the Well-being of Future Generations Act and improved health is one of the objectives of Future Wales and a theme of NRW's South West Wales Area Statement. The Council signed the Dublin Declaration of "Age Friendly Cities and Communities" in 2014 pledging to '*develop safe and inclusive public spaces, housing of the highest quality, communities for all ages, available & affordable public transport, etc*'.
- 3.4.2 The County falls within the Swansea Bay University Health Board area and their Population Health Strategy for Swansea Bay<sup>36</sup> seeks to reduce inequalities, create healthy sustainable places and communities and recognise the link between planning and health policies. A stated aim is to '*create healthy and sustainable communities through placemaking*'.
- 3.4.3 The County contains 4 hospitals and the existing LDP contains specific policies in relation to Morriston and Cefn Coed hospital sites. There are 5 Health Clusters within the County, each with a range of GP surgeries, dentists, optometrists, community pharmacists, and care homes. The Health Board believes the estimated increase in population set out within the existing LDP can be met by existing pharmacies<sup>37</sup>.
- 3.4.5 Some 47% of the County's population are in 'very **good health**' and 30.9% in 'good health' (Census 2021). However, 7.3% (17,500 people) are in bad or very **bad health**, higher than both Wales (6.9%) and England & Wales (5.2%). The proportion of **disabled people** (defined under the Equality Act) was 22.4% (53,500), higher than both Wales (21.6%) and England & Wales (17.5%)<sup>38</sup>. There has been a decline childhood health and wellbeing in primary age children between 2014-2022<sup>39</sup>, including in physical health, dietary habits, an increase in loneliness and mental health issues. Educational attainment needs to be considered in the context of health and wellbeing<sup>40</sup>.
- 3.4.6 Crime and safety affects peoples well-being. Between May 2020 and June 2021 there were 18,240 recorded crimes in Swansea, a decrease of 1,101 (-5.7%) on the previous 12 months. The biggest increases (over +10%) occurred in the possession of drugs and public order offences<sup>41</sup> categories.
- 3.4.7 The County contains several designated Quiet Areas<sup>42</sup> – tranquil places within urban areas which are deemed to be valued by the local community.

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<sup>36</sup> <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/board-papers-march-2023/32-appendix-1-population-health-strategypdf/#:~:text=The%20Strategy%20will%20set%20out,causes'%20of%20ill%2Dhealth.>

<sup>37</sup> <https://sbuhb.nhs.wales/files/pna-documents/sbuhb-pna-final-0-3-pdf/>

<sup>38</sup> [2021 Census: population characteristics - Swansea](#)

<sup>39</sup> Using data from the annual HAPPEN-Wales Surveys <https://happen-wales.co.uk/>

<sup>40</sup> <https://popdatasci.swan.ac.uk/centres-of-excellence/ncphwr-2/>

<sup>41</sup> The Swansea Assessment of Local Wellbeing 2022

<sup>42</sup> [Environmental Noise Action Plans and Quiet Areas - Swansea](#)



- 3.4.8 The County declared an Air Quality Management Area in 2001 and reviewed in 2010, due to exceedances of nitrogen dioxide annual mean air quality standard. All sections of the AQMA are now compliant and there were no exceedances of air quality standards within the county in 2023<sup>43</sup>. NRW have identified Castle, Townhill, Landore, Penderry and Morryston as areas with the highest demand for greenspace interventions to reduce air pollution in the County.<sup>44</sup>
- 3.4.9 The Gower Area of Outstanding Natural Landscape is a designated International Dark Skies Community<sup>45</sup>. Since 2019 light pollution has been increasing along the south Gower coast (Bracelet Bay westward). One of the causes is poor lighting design in and around developments and light spill from new developments.
- 3.4.10 Due to the area's long history of mining and quarrying some parts of the County have historic underground workings and surface spoil heaps. There is only one defined slip area which is located at Graig Trewyddfa.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
Promote a Placemaking approach that enables new developments to be sustainably located with access to a range of services by active travel, reducing the need to travel by the private car, and encouraging sustainable neighbourhoods.	Countywide	Health is a principle element embedded within the Well-being of Future Generations Act. This places an emphasis on taking a holistic, long term and collaborative approach to achieving well-being through placemaking with improved health being one of the objectives of Future Wales. Development will have to comply with relevant legislation regarding air quality, soundscapes, noise and light pollution, even without LDP2.
Integrate health and wellbeing throughout relevant policies.		Without a statutory up to date development plan most recent evidence and assessments cannot be integrated into development plan policies and strategies. LDP2 will be developed in consultation with the Health Board and other statutory bodies to ensure health and wellbeing is wholly integrated throughout and addresses
The County has an ageing population, so this needs to be considered as part of future policy and strategy development.		
Consult with Health Board and Public Health Wales		

<sup>43</sup> [https://www.swansea.gov.uk/media/15782/Progress-report-2023/pdf/foSwansea\\_Council\\_2023\\_APR\\_v3.0.pdf?m=1705915908787](https://www.swansea.gov.uk/media/15782/Progress-report-2023/pdf/foSwansea_Council_2023_APR_v3.0.pdf?m=1705915908787)

<sup>44</sup> [Welsh Information for Nature-based Solutions \(WINS\)](#)

<sup>45</sup> [Gower's magical night-time wins international accolade - Swansea](#)

throughout LDP2 preparation.		issues at a local level, such as dementia friendly cities.
Protect and enhance community facilities of value, to aid socio-community wellbeing.		Adopted SPGs relating to Placemaking will have reduced weight under a time expired development plan.
Increase awareness of soundscape and tranquillity for health and wellbeing.	Countywide, including specific city centre and Gower Area of Outstanding Natural Beauty	Development will have to comply with relevant legislation regarding air quality, soundscapes, noise and light pollution, even without LDP2. However, evidence, new TANs and policies will not be integrated into a new statutory development plan at the local level.  There will be no ability to have local Placemaking and Design principles and policies to directly focus on soundscapes and the impact of light pollution on tranquillity and health and wellbeing.
Help reduce light pollution, for the benefit of dark skies, tranquillity, ecology and health and wellbeing, particularly within the Gower AONB, particularly regarding light spill from new development.		
Increase GI interventions to aid air pollution mitigation; ensure new developments do not significantly degrade air quality and minimise new sensitive receptors being introduced unmitigated into areas of existing poor air quality.		Development will have to comply with relevant legislation regarding air quality, even without LDP2. Development within the County's AQMA is controlled. However, development must be considered in relation to impact on air quality. However, LDP2 can help coordinate development, promote a sustainable growth strategy which reduces reliance on the private car and encourages a modal shift and take account of cumulative impacts of development.
Help minimise the emissions of air pollutants and the number of people who are receptors.	Countywide and AQMA	Development will have to comply with relevant legislation regarding water quality even without LDP2. Surface and ground waters can be directly and indirectly impacted by development and local policies, ensuring potential impacts are considered on specific and wider areas, as well as cumulative impacts.
Understand any areas of land instability when considering future use of areas	Specific areas of land instability	LDP2 will illustrate the area as a constraint.
Help target resources to address deficiencies in greenspace.		Without LDP2, links to future GI assessment and evidence base would have less weight and cumulative and collaborative impacts of policies and developments may not be taken into account.
<p><b>General Commentary:</b> Health is a principle element embedded within the Well-being of Future Generations Act which places an emphasis on taking a holistic, long term and collaborative approach to achieving well-</p>		

being through placemaking and improved health is one of the objectives of Future Wales. Although development will have to comply with statutory legislation even without LDP2, there is potential for the baseline scenario to be a worsening one over the long term when considered against ISA objectives.

The lack of a statutory local development plan may lead to uncoordinated developments, which do not consider wider or cumulative health and wellbeing implications of development, such as the interrelationship of health and wellbeing with the provision of GI, accessible greenspaces, play areas, connection with nature, active travel routes and so on which will have immediate benefits for residents as well as long term health and wellbeing benefits. The location of new development is not yet known but it is possible that air quality will continue to improve due to the shift to electric vehicles and other transport modes and the decarbonisation of the energy and housing sectors.

### **3.5 WATER (Summary and updates since April 2024)**

- 3.5.1 The County falls within the Western Wales River Basin and the Swansea Bay Opportunity Catchment. Waterbodies deliver environmental and health and well-being benefits, and areas of vegetation alongside rivers and streams can filter pollutants, reduce erosion and provide shade to lower water temperatures. Nature in urban streams and rivers improves water quality and increases biodiversity.
- 3.5.2 Comparisons from 2015 and 2021 classification of the status of surface and ground water bodies (Water Framework Directive) show there has been a deterioration in one water body – ‘River Llan headwaters to tidal limits’ whose status had deteriorated from good to moderate. Other water bodies remained the same.<sup>46</sup>
- 3.5.3 Dŵr Cymru predicts a surplus of water between 2020 and 2050 for the South West Wales water resources zone, based on growth set out in the regions current LDPs. The zone is also deemed to be resilient to climate change and extreme drought events (1 in 200 year drought event)<sup>47</sup> due to resource available in Llyn Brianne. Dŵr Cymru aims to use nature to reduce flood risk and pollution in the County<sup>48</sup>.
- 3.5.4 The majority of the sewer pipes in the County (and Wales) are ‘combined sewers’ (both wastewater (toilets, sinks, showers, baths etc.) and clean rainwater from roads, hardstandings, roofs etc go into the same sewer pipe). Heavy rain can cause too much water to go into the sewer pipe, resulting in possible flooding unless it is allowed to spill elsewhere. Storm overflows (often referred to as Combined Sewer Overflows) act as overflow valves to reduce the risk of sewage backing up during heavy rainfall. An increasing number of overflows from combined sewers is potentially impacting bathing water quality, but Bracelet, Caswell, Llangland, Oxwich, Port Eynon and Rhossili defined bathing waters were classed as ‘excellent’ in 2023 and 2022; and Limeslade and Swansea Bay were classed as good in 2023 and 2022. Gower contains a large potable groundwater abstraction, which

<sup>46</sup> [Water Framework Directive \(WFD\) Regulations Cycle 3 Classification | DataMapWales](#)

<sup>47</sup> Dŵr Cymru Welsh Waters Final Water Resource Management Plan 2019 (2019)

<sup>48</sup> ‘Welsh Water 2050: Review and Update’,

is designated a Source Protection Zone (SPZ) in order to protect drinking water quality and prevent activities that impact abstraction.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
Water supply exceeds demand, so no anticipated issues relating to increased population and demand for water from industry.	Countywide	This is unlikely to change due to the influence of LDP2 as sufficient water supply exists.
Help ensure new development is serviced by existing water supply and sewerage network or can be connected to network.		Regulations relating to water and sewerage infrastructure, water quality, flood risk and SUDS must be adhered to. However, the development plan can provide a coordinated approach with water companies to ensure that infrastructure for new developments can be factored in their forward plans and help prevent discharge into freshwater and marine environments, including bathing waters.
Help reduce and where possible eliminate environmental pollution into freshwater and marine environs (as influenced by the land use planning system).		Without LDP2 there may be a lack of strategic co-ordination between developers and utility providers. This may result in delays in bringing developments forward and potential impacts on water quality.
Help ensure water infrastructure and supply is resilient to climate change; and help improve bathing water quality, the quality of groundwater and surface water bodies, and river quality.		
<b>General Comment:</b> Potential for the baseline scenario, particularly with regard to sewerage and surface water infrastructure, to be a worsening one when considered against ISA objectives.		

**3.6 CLIMATIC FACTORS** (Summary and updates since April 2024)

3.6.1 Swansea Council declared a Climate Emergency in 2019 and the Council is committed to become a Net Zero organisation by 2030<sup>49</sup> and net zero County by 2050<sup>50,51</sup>. This complements the objective of achieving a net zero energy system by 2050 set out within the 2022 Regional Energy Strategy<sup>52</sup>. The Council is pursuing an energy hub and tidal lagoon in

<sup>49</sup> [Swansea Council Charter on Climate Change - Swansea](#)

<sup>50</sup> [Climate change and nature recovery - Swansea](#)

<sup>51</sup> [Swansea Local Area Energy Plan 2024](#)

<sup>52</sup> [South West Wales Energy Strategy](#)

Swansea Bay (the Blue Eden Project) and the Welsh Government recognises advantages for Swansea Port and Docks from low carbon and renewable energy generation<sup>53</sup>.

- 3.6.2 Both total and per capita greenhouse gas emissions in the County have been decreasing since 2005 (2,214.2 total and 9.6tCO<sub>2</sub>e in 2015 to 1,179.9 total and 5.0tCO<sub>2</sub>e in 2021). The transport sector has the largest greenhouse gas emissions, followed by the domestic sector. The Standard Assessment Procedure (SAP) assess the energy performance of dwellings (adequate energy performance is SAP 65 or higher). The average SAP rating for Swansea Council dwellings was 69 (band C) and 100% of properties have reached this level (meeting the WGs national indicator).
- 3.6.3 The South West Wales Energy Strategy, 2022<sup>54</sup>, overall objective is a net zero regional energy system by 2050 and that by 2035 the region will generate the equivalent of 147% of its own electricity consumption from renewables. The Swansea Local Area Action Plan 2024<sup>55</sup> identifies changes required to the local energy system and built environment to achieve a net zero energy system by 2050. The amount of low carbon energy and heat generated in the County is increasing (electricity generation increasing from 14,733MWh in 2012 to 140,827MWh in 2020). The County contains part of a pre-assessed Area for Wind Energy, as defined in Future Wales. The LDP<sup>56</sup> was informed by a Renewable Energy Assessment (REA) (2018) and identifies eleven solar Local Search Areas (LSAs). The target is to deliver up to 21.8MW energy within the solar LSAs and up to 40.6MW in the Wind SSA by 2025. A Stage 1 REA has been commissioned, the purpose of which is to estimate the scale of resource within Swansea that is available for use providing context for setting local policy and targets and how the authority can play it part in meeting national and UK renewable energy targets, set out future energy demand, together with existing and planned renewable capacity. A detailed REA will be produced to inform the Deposit Plan.
- 3.6.4 Climate projections indicate an increase in the frequency and intensity of extreme weather events, including storm events in the Summer and prolonged wet periods during the Winter. Both the River Tawe and River Loughor rise quickly during storm events and both are affected by tidal interactions. NRW identify communities at greatest risk from flooding<sup>57</sup>, with Blackpill and Swansea City centre identified as communities at risk from flooding from rivers or the sea. Penclawdd and Crofty have Community Flood Plans. The Council<sup>58</sup> estimated in 2015 that 879 people, 262 residential properties, 96 non-residential properties, 1km of Primary Trunk road, 1km of main railway line, 7ha of parks/gardens and 3 listed buildings are at high risk of flooding. Currently coastal defence works are being undertaken in Mumbles<sup>59</sup> in order protect property from future tidal flooding events due to increased tidal levels and increased storm events as a result of climate change. Seventy-nine properties with more than a one in 10 chance of tidal flooding will be protected.

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<sup>53</sup> [gov.wales/sites/default/files/publications/2019-11/welsh-national-marine-plan-document\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-11/welsh-national-marine-plan-document_0.pdf)

<sup>54</sup> [South West Wales Energy Strategy](#)

<sup>55</sup> [Swansea Local Area Energy Plan 2024](#)

<sup>56</sup> [Swansea Local Development Plan 2010-2025 \(LDP\) - Swansea](#)

<sup>57</sup> [Communities at Risk Register \(CaRR\) | DataMapWales \(gov.wales\)](#)

<sup>58</sup> [Flood Risk Management Plan 2015 - Swansea](#)

<sup>59</sup> [Mumbles coastal protection project - Swansea](#)

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP2
Built environment and infrastructure must be resilient and adaptable to the current and future effects of climate change, with particular relevance to sea and river flooding.	Countywide, national and potentially global	Without LDP2 development would still have to comply with the requirements of national planning policy and Future Wales with regard to the location of development in relation to flood risk, shoreline management and renewable/low carbon energy proposals. However, it is possible that development could be uncoordinated and lack a wider placemaking approach, including GI, climatic change adaptations and mitigation proposals.
The land use spatial strategy and location of new development must take a precautionary approach with regard to flood risk in line with WG policy.		
Protect coastline from inappropriate development and consider the consequential impacts of climate change on the coastline and coastal environments.	countywide	Associated documents such as the Shoreline Management Plan and adopted SPG's may have less weight if not referenced within an extant development plan. An integrated Housing and Employment strategy will ensure growth is sustainable. le ensuring housing and employment is broadly aligned will ensure employment and housing needs are met without need for unsustainable out commuting.
Facilitate the aim that ecosystems and the natural environment are resilient and able to adapt to climate change.		
Facilitate the development of appropriate renewable and or low carbon energy schemes in the County, informed by an up to date Renewable Energy Assessment		Proposals for renewable/low carbon energy would not be informed by an up to date Renewable Energy Assessment. An up to date assessment identifying potential areas of opportunity will facilitate a potential increase in delivery of RE schemes by providing guidance to the industry on areas in Swansea that may be potentially acceptable for further consideration and assessment. The links between energy generation and supply infrastructure, such as grid capacity or battery storage may not be considered at the outset of proposals in a strategic manner.

**General comment:** Swansea aims to be net zero as a Council by 2030 and the County by 2050. Potential for the baseline scenario, particularly with regard to climate change, net zero targets, flooding and low carbon generation to be a worsening one when considered against ISA objectives if no strategic plan in place.

### 3.7 MATERIAL ASSETS (Summary and updates since April 2024)

- 3.7.1 PPW supports the role of the planning system in making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environments and to contribute to the achievement of the well-being goals. A circular economy is one which aims to keep materials, products and components in use for as long as possible. NRW (SoNaRR 2020) includes a long term aim of a Regenerative Economy.
- 3.7.2 The WG's waste strategy 'Towards Zero Waste' requires a reduction of around 1.5% (of the 2006-7 baseline) each year across all sectors, including household waste. The amount of waste collected and disposed of by the Council (Local Authority Collected Waste (LACW) (household and non-household waste collected and disposed of by local authorities)) is decreasing, with 104,939 tonnes collected 2023/24, compared to 106,858 tonnes in 2022/23<sup>60</sup>. This is reflected in decreasing amounts of residual (black bag) waste from each dwelling from 317kg in 2022/23 to 305kg in 2023/24, below the Welsh average of 360kg per dwelling in 2023/24<sup>61</sup>. The Council also has 5 household waste recycling centres (HWRCs).
- 3.7.3 The WG strategy 'Beyond Recycling', 2021<sup>62</sup>, is a ten year strategy to move towards a circular economy<sup>63</sup> and towards the 2050 net zero waste and net zero carbon targets. The Council met the strategy's statutory target of recycling a minimum of 70% of waste by 2024-25 (70.4% of waste reused/recycled/composted 2023/24)<sup>64</sup>. The amount of waste being landfilled in Wales is decreasing, and the Tir John landfill site closed in 2021, but remains operational until 2024 in order to import soil and waste to restore the site. There will be a need to retain a small landfill capacity in Wales, in respect of residual waste, and the WG<sup>65</sup> sets out 7 and 5 year landfill void triggers, in order to enable the market to come forward with a solution to the lack of landfill capacity. The Mid & SW Wales region has some 5.5 years landfill capacity remaining, thus above the trigger set out in TAN 21 (Mid and South West Wales Waste Planning Monitoring Report 2022/2023).
- 3.7.4 There is a moratorium on large scale (10MW or greater) energy from waste developments in Wales and small scale energy from waste plants (<10MW) will only be allowable if the applicant can demonstrate need for such a facility for the non-recyclable wastes produced in the region. Any new small scale facilities must also supply heat, and where feasible, be carbon capture and storage enabled or ready.

<sup>60</sup> [Annual management of waste by management method \(tonnes\)](#)

<sup>61</sup> [Annual residual household waste produced per dwelling \(kilograms\) by local authority](#)

<sup>62</sup> <https://www.gov.wales/sites/default/files/publications/2021-03/beyond-recycling-strategy-document.pdf>

<sup>63</sup> A circular economy is one which aims to keep materials, products and components in use for as long as possible

<sup>64</sup> [Annual reuse/recycling/composting rates by local authority](#)

<sup>65</sup> <https://www.gov.wales/sites/default/files/publications/2018-09/tan21-waste.pdf>



- 3.7.5 Local mineral resources have historically been of considerable importance to the County, but there is now a reliance on quarries in neighbouring authorities, as well as marine-dredged sand, to provide for the County's aggregate needs. Almost all of the County's Carboniferous limestone resources lies within the Gower Area of Outstanding Natural Landscape and cannot be worked, but are safeguarded for future use. These safeguarded resources, along with areas of sandstone and land based sand and gravel (in accordance with the British Geological Survey's safeguarding maps) are defined on the LDP Proposals Map and it is expected that these will also be shown on the LDP2 Proposals Map (unless there is a change in the national policy requirement to do so).
- 3.7.6 The County contained numerous disused coal mines. The WG will not authorise new Coal Authority mining operation licences or variations to existing licences<sup>66</sup>. The presumption against coalmining is also contained within PPW.
- 3.7.7 Secondary aggregate was imported (by road) from the Port Talbot steelworks (this will be kept under review whilst the Steel Works are restructuring), whilst recycled aggregates from construction, demolition and excavation wastes are likely to be in plentiful supply within the urban areas of Swansea itself. Locally-derived recycled aggregates are important in order to offset the transportation of both primary and secondary aggregates from other sources.
- 3.7.8 The Council is required to make future provision for Carboniferous HSA Sandstone of 0.305 million tonnes per year until the end of the current LDP period and for 10 years thereafter<sup>67</sup>. As the County has no landbanks of permitted reserves, allocations totalling at least 7.636 million tonnes will need to be identified within LDP2. The Council entered into a Statement of Sub Regional Cooperation (SSRC) <sup>68</sup> in 2021 with Councils in the sub-region (Neath Port Talbot (NPT) County Borough Council and part of Carmarthenshire County Council (CCC)). The SSRC confirms that each constituent Council accept the individual apportionments for aggregates, the sub-regional requirement will be met and NPT will cover Swansea's apportionment until the production of LDP2. Any future allocations should be identified as Specific Sites. If there are no sites, Preferred Areas broad Areas of Search should be identified within LDP2 or the SSRC is continued.
- 3.7.9 Potential major infrastructure projects are likely to have significant aggregate demand. The loss of minerals infrastructure should be avoided and national policy states that all disused or unused rail sidings and railways should be safeguarded to enable them to be brought back into use in the future and existing transport infrastructure protected from encroachment from other types of development. The National Marine Plan, 2019, seeks to support the sustainable development of port, harbour and marina infrastructure and safeguard the Ports and Shipping Sector. The Port of Swansea is owned by Associated British Ports (ABP) and covers some 521 acres. Together with the ABP's Port Talbot, the port contributes £670 million to the economy and supports nearly 10,000 jobs and offers significant future potential to facilitate emerging transformative regeneration schemes in

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<sup>66</sup> [Coal policy statement \[HTML\] | GOV.WALES](#)

<sup>67</sup> <https://www.swansea.gov.uk/regionaltechnicalstatement>

<sup>68</sup> <https://democracy.swansea.gov.uk/documents/s71203/07%201%20of%202%20Aggregates%20report.pdf?LLL=0>

this area. In 2023 the UK Government designated the Celtic Freeport at Port Talbot. ABP expect this to result in increased activity at the Port of Swansea.

- 3.7.10 The vulnerability of infrastructural assets to climate change is noted within the Climate Adaptation Strategy for Wales (2024)<sup>69</sup>. Many services and their underlying infrastructure rely on digital connectivity to operate effectively including water, electricity and gas infrastructure.
- 3.7.11 The Transport Hierarchy for Planning ([PPW](#)) supports the aims of enhancing sustainable travel options and decreasing dependency on car travel by bringing services to people to reduce the need to travel. The Council’s Active Travel Network Map (ATNM)<sup>70</sup> 2022 shows the routes the Council intends to deliver to 2033. In addition, there are 650km (around 400 miles) of public rights of way within the County, of which nearly 515km is public footpath and around 136km is public bridleways. The emerging scheme for the Swansea Bay and West Wales Metro will ultimately provide a series of regional integrated transport systems across Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea.
- 3.7.12 The Council’s Analysis of Housing Supply Paper, 2024, prioritises the use of suitable and sustainable previously developed land, and/or underutilised sites, for future housing development over the LDP2 period. This ensures efficient use of land by maximising the use of previously developed land, and ensuring development is located close to existing infrastructure and services where capacity exists.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP
Maximise the efficient use of land, following the search sequence for new sites outlined in national policy, informed by a land use capacity study.	countywide	Development would have to comply with national policy, but there wouldn’t be a coordinated strategic plan for future development which maximises opportunities for re use of previously developed land and the prioritisation of sustainable locations for future growth informed by local evidence.
Regard must be had to the capacity of landfill sites in the region	Countywide and regional	Future development will have to comply with relevant legislation and Future Wales policies relating to waste developments, highways infrastructure, rail, utilities infrastructure and active travel.
Ensure sufficient mineral resources are available to facilitate key infrastructure projects.		

<sup>69</sup> <https://www.gov.wales/sites/default/files/publications/2024-10/climate-adaptation-strategy-for-wales-2024.pdf>

<sup>70</sup> <https://www.swansea.gov.uk/activetravelact>

<p>The potential need for new electricity infrastructure in order to improve network capacity and connections (many cross cutting issues such as implications for landscape and public amenity)</p>		<p>Without LDP2 there would be no local policy informed by latest regional evidence for mineral resources and infrastructure and waste infrastructure to meet future demands and serve future developments.</p>
<p>Active travel network priority routes are taken into account in the development of LDP2</p>		<p>Active travel routes are a component of Placemaking and GI and a strategic approach to facilitate connections and improvements to routes or contribute to delivery of new routes may not be possible without an up to date development plan.</p>
<p>The land use spatial strategy to have appropriate regard to the emerging South Wales Metro proposals</p>		<p>Potential of SWW Metro, Free Port and future development of Swansea Port and Docks may not be considered strategically without an up to date LDP and associated growth and spatial strategy and policies. The strategic consideration of emerging transport and growth options is crucial for delivering effective Placemaking and sustainable communities.</p>
<p>Consider potential implications of the Free Port development at Port Talbot in relation to Swansea Docks and Port.</p>		<p>An integrated Housing and Employment strategy will ensure growth is sustainable. le ensuring housing and employment is broadly aligned will ensure employment and housing needs are met without need for unsustainable out commuting.</p>
<p>Consider ecological footprint and climate change impacts of a development by considering the entire life cycle of a development, particularly with regard to materials.</p>	<p>Countywide, regional, national and global</p>	<p>No local policy framework to encourage circular and regenerative economies.</p>
<p><b>General Comments:</b> Potential for the baseline scenario to be a worsening one when considered against ISA objectives., particularly in respect of coordinated infrastructure development and mineral and waste supply and management.</p>		

### 3.8 CULTURAL HERITAGE Summary and updates since April 2024

3.8.1 There are 500+ listed buildings within the boundaries of the City and County of Swansea<sup>71</sup>. Approx 2% are Grade I listed, 4% are Grade II\* and 94% are Grade II. The County also contains buildings that do not meet the national threshold for designation as Listed

<sup>71</sup> [Listed buildings - Swansea](#)

Buildings, but are locally significant historic buildings. The Council intends to establish an inclusive process for the identification of places, structures and buildings of special local interest and this will inform LDP2. There are 31 conservation areas in the County, 120 Ancient Monuments, 5 Archaeological Sensitive Areas (ASAs) and 2 canals.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within ISA Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP
Contribute to the objective to preserve, protect and enhance cultural assets and their settings.	Countywide and specific defined areas such as conservation areas.	Many heritage assets are protected via legislation other than the land use planning system. However, by including policies relating to built-heritage, archaeology and landscape means that wider considerations relating to Placemaking and regeneration can be considered
Understand the buildings and other assets considered to be of special Local Importance and the mechanisms available through the LDP2 to safeguarding these		Non statutory designations such as ASAs and Historic Assets of Special Local Interest are given weight by inclusion within LDP2.
Have regard to the Historic Environment (Wales) 2023 Act throughout the LDP2 process		
Facilitate the beneficial reuse of underused historic buildings		
<b>General Comments:</b> Potential for the baseline scenario to be a worsening one when considered against ISA objectives.		

**3.9 LANDSCAPE AND SEASCAPES (Summary and updates since April 2024)**

3.9.1 The County has significant areas of statutory and non statutory protected landscapes. The distinctive character and natural beauty of the **Gower Area of Outstanding Natural Landscape** (previously known as Gower AONB) covering some 188km<sup>2</sup> (73 m<sup>2</sup>) of the County has been protected in the national interest since 1956. Some 33miles of the National Landscape is designated **Heritage Coast** which seeks to protect the coastline from insensitive developments. There is no defined inland boundary. The Gower AONB Management Plan includes the Heritage Coast within its scope.

3.9.2 There are 41 Landscape Character Areas (LCAs) (based on LANDMAP) within and adjoining the Gower AONB<sup>72</sup>. The Gower Landscape Sensitivity and Capacity Study for Caravan and Camp Sites<sup>73</sup> built on the Gower LCA and identifies which areas of the Gower AONB are at

<sup>72</sup> [https://www.swansea.gov.uk/media/3663/Gower-Landscape-Character-Assessment-2013/pdf/smGower\\_Landscape\\_Character\\_Assessment\\_2013.pdf?m=1632999476570](https://www.swansea.gov.uk/media/3663/Gower-Landscape-Character-Assessment-2013/pdf/smGower_Landscape_Character_Assessment_2013.pdf?m=1632999476570)

<sup>73</sup> <https://www.swansea.gov.uk/gowerlandscapecapacitystudy>

landscape capacity, in terms of caravan and camping sites, and which areas might have potential for planned expansion of facilities, whilst taking account of the capacity and suitability of the area to accommodate such expansion. The documents provide baseline evidence and underpin some LDP policies.

- 3.9.3 The Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment, 2017<sup>74</sup>, identifies 8 Seascape Character Areas (SCA's) which abut the County's coastline and a number of other offshore SCA's around the County.
- 3.9.4 The County contains 13 Registered Historic Parks and Gardens, 2 Historic Landscapes (both within the AONB) and a Country Park, 11 designated Village Greens and 49 registered areas of Common Land, mainly located in Gower and Mawr.
- 3.9.5 The LDP designated 4 non-statutory Special Landscape Areas outside of the AONB, which are considered to be of high landscape value and 9 green wedges. The boundaries of each will be reviewed as part of the preparation of LDP2.

**Key Issues, commentary, characteristics of area likely to be significantly affected and likely future without LDP2**

Key issue (identified within IS Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP
Contribute to the objective to conserve and enhance protected landscapes, particularly Gower AONB and its setting	Gower AONB and its setting	The Gower National Landscape –AONB would continue to be protected via statutory legislation. However there would not be an up to date local planning framework to designate the SLA and Green Wedges and therefore affected areas of land would not benefit from local planning policy to protect special character or measures to manage coalescence between settlements.
Review the SLA boundaries, the Green Wedge and settlement boundaries.	SLAs and green wedges	
Balance pressure and need for development against the need to protect the integrity of protected landscapes	Countywide	There would be no local policies requiring consideration of cumulative impacts. Existing baseline documents and SPGs would have reduced weight in decision making.
Provide sufficient safe and appropriate formal and informal areas for children and young people to play		No up to date planning framework and S106 strategy for developers in relation to the need to provide play space, or secure improvements to existing, in new developments
Use GI Assessment and Strategy to inform LDP2, when available		The multi-functional benefits of the wider green infrastructure and its connectivity would not necessarily be recognised or safeguarded without LDP2. This could have significant consequences through jeopardising the
Sensitivity of seascape and undeveloped coast to		

<sup>74</sup> <https://www.swansea.gov.uk/sca>

developments, onshore and offshore be considered within LDP2		effective management of the impacts of climate change and result in habitat fragmentation.
Climate change influences on landscape, seascape and coastline be considered in LDP2.	Coastline and onshore areas of influence	The consideration of developments influence on seascape, plus the cumulative impacts of developments, may not be considered without the LDP2 and local policies.
<p><b>General Comments:</b>  Potential for the baseline scenario to be a worsening one when considered against ISA objectives, particularly without local landscape designations and placemaking policies to ensure the location and design of new development is sensitive to landscape character.</p>		

### 3.10 WELSH LANGUAGE Summary and updates since April 2024

- 3.10.1 The following information and statistics relating to Welsh language skills within the County are contained within the Councils published Welsh Language Profile, 2024<sup>75</sup>. In Wales as a whole, some 538,296 usual residents aged 3 or over (17.8%) were able to speak Welsh (Census 2021), a decline from 562,000 or 19% in 2011, or minus 1.2%. In 2021, some 25,986 people in Swansea aged 3 or over were able to speak Welsh (11.2%) compared to 11.4% in 2011 (approx 350 fewer Welsh language speakers (over the age of 3) in Swansea in 2021, and an increase of 1,100 people who do not speak Welsh). Although a 0.2% decline, this is less than that experienced in Wales.
- 3.10.2 The latest Annual Population Survey (APS) results for Swansea, for the year ending December 2023 suggest that 47,100 people (19.6% of people aged 3 and over) can speak Welsh, significantly more than the 2021 Census figure, but lower than the Wales average of 29.2%.
- 3.10.3 The largest percentages of Welsh speakers in the County live in the wards of Pontarddulais (25.9%), Clydach (20.1%) and Pontlliw & Tircoed (19.4%) (Census 2021). Townhill (5.6%), Cwmbwrla (6.6%), and Castle (6.8%) wards have the lowest percentage of Welsh speakers. In order to aid comparison of changes between Census dates and to reflect the 2022 ward boundary changes, wards are grouped to reflect previous ward boundaries. 10 of the 24 grouped ward areas showed an increase in the number of Welsh speakers, with 14 areas showing decreases. The largest increases in the number of Welsh speakers (170-180 approx.) were recorded in the wards of Mumbles and Sketty. The largest increase in percentage terms was in Landore ward (+35%), although this was lower in absolute terms (+130 approx.). Elsewhere, larger percentage increases were mostly recorded in wards to the south and west of central Swansea. Four areas showed decreases of over 10% between Censuses, the largest being Penclawdd ward (-20% or 100 people approx.). Other notable decreases in the number of Welsh speakers were mainly in the more rural north areas of the county, including areas historically (and still) with the highest proportion of Welsh speakers

<sup>75</sup> <https://www.swansea.gov.uk/welshlanguagestatistics>

3.10.4 The 2021 Census estimates that 25.8% of children aged 5-15 in Swansea and 17.7% of those aged 16-19 are able to speak Welsh, above the overall average of 11.2%. These figures will reflect the influence of the education system on Welsh language skills and its usage among school-age children. At ages 16-19 there has been an increase in the number of Welsh speakers in Swansea between Censuses of 240 or 12.8%. By contrast, this figure fell across Wales by 11.1%. A similar percentage increase was recorded for the 20-44 age group in Swansea, at +12.8% (Wales +2.0%). Some 15.4% of pupils in the County attended Welsh medium schools in 2019/2020 and the Council<sup>76</sup> has set a Vision for the next ten years which increasing the number of pupils attending Welsh medium schools to between 23% and 27% of year 1 pupils by 2032. Part of the Vision is to ‘ensure that all learners have access to Welsh-medium education within a reasonable distance of their homes’ and Welsh medium provision is identified as being deficient in:

- a. Gorseinon/Penllergaer
- b. Sketty/Dunvant/Killay
- c. Townhill/Mayhill/Waun Wen/Plasmarl
- d. St Thomas/Port Tennant<sup>77</sup>

3.10.5 The current LDP defines a Welsh Language Sensitive Area, the boundary of which will be reviewed as part of the preparation of LDP2.

Key issue (identified within IS Scoping Report)	Characteristics of area likely to be significantly affected	Without LDP
Help safeguard and support growth in the use of the Welsh language as an integral part of social and community life.	Countywide	The importance of the Welsh Language is highlighted by the WG’s target of one million Welsh speakers by the year 2050 and Wales of vibrant culture and thriving Welsh language is one of the seven well-being goals identified in the WBFGA and embedded in PPW. The impacts of the land use planning system on the Welsh language are not direct, but can be a means to facilitate and encourage growth and ensure the Welsh language is integrated into the social and cultural fabric of a community, via for example new Welsh medium education facilities, and having polices to mitigate the impact of new development on Welsh speaking communities. Without an up to date LDP there would be no policies in place to ensure new developments mitigate impacts on the Welsh language, and promote measures to contribute to enhancement of its use particularly where the Welsh language is an important part of the social fabric. LDP2 will have to ensure Welsh Medium education needs are being met, with regard to the location of schools.

<sup>76</sup> [https://www.swansea.gov.uk/media/1966/Swansea-WESP-2022--2032-final/pdf/diWESP\\_2022\\_2032\\_FINAL.pdf?m=1709890075437](https://www.swansea.gov.uk/media/1966/Swansea-WESP-2022--2032-final/pdf/diWESP_2022_2032_FINAL.pdf?m=1709890075437)

<sup>77</sup> [Agenda for Cabinet on Thursday, 15 February 2024, 10.00 am - Swansea](#)



## 4.0 MAY 2024 VERSION OF LDP2 VISION AND OBJECTIVES

### VISION

4.0.1 The Vision sets out the overarching aim of LDP2 and how the area is envisaged to develop, change and be enhanced and is formed from national planning priorities and local strategies and Key Issues for the County (identified within the ISA Scoping Report). A draft Vision for LDP2 was presented for public and stakeholder consultation in May 2024<sup>7879</sup>.

“Swansea will be thriving as a coastal **city of innovation** at the heart of the South West Wales Region, where **placemaking and well-being** are the foundation principles for development. Residents and visitors will enjoy a **high quality of life** and access to **outstanding natural and built environments** across Swansea’s **urban, rural, beach and waterfront areas**. **Neighbourhoods of distinct character** will offer a range and choice of **quality homes**, well connected to day to day services and facilities, to enable community life to flourish and contribute towards **good health outcomes**. The **natural environment** will be significantly enhanced, which alongside **sustainable levels of economic and commercial activity**, will contribute to Swansea moving towards a just transition to **net zero by 2050**.”

4.0.2 The Vision was assessed against the ISA objectives (Table 5) which suggested amendments to reference to culture and heritage (which would encompass the Welsh language), climate change and ecosystem resilience. Further details are contained within the full ISA Report.

**Table 5: ISA scoring of May 2024 draft Vision**

	ISA Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
<b>Draft Vision May 2024</b>															

Scoring:

	Positive alignment between LDP2 objective and ISA objective		No direct link between alignment between LDP2 objective and ISA objective
	? Unknown alignment between LDP2 objective and ISA objective		Potential conflict between LDP2 objective and ISA objective

### OBJECTIVES

4.0.3 LDP Objectives focus on how the LDP Vision will be delivered and set out the overarching guiding principles for the LDP, set the context for the Strategic Growth and Spatial Options and a framework for Strategic and Detailed Policies. Eighteen objectives were presented alongside the Vision in May 2024 and a summary of the assessment findings is presented in Table 6.

<sup>78</sup> <https://swansea.oc2.uk/document/10>

<sup>79</sup> [https://swansea.oc2.uk/docfiles/11/KiVO\\_SwanseaLDP2\\_May2024\\_f.pdf](https://swansea.oc2.uk/docfiles/11/KiVO_SwanseaLDP2_May2024_f.pdf)

**Table 6: Summary of assessment of May 2024 draft LDP2 objectives and ISA objectives**

LDP 2 Objectives	ISA objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1	Green	Green	Green	Green	Green	Yellow	Blue	Blue	Green	Blue	Yellow	Yellow	Yellow	Green	Green
2	Blue	Yellow	Green	Green	Green	Green	Yellow	Blue	Green	Blue	Yellow	Yellow	Yellow	Blue	Blue
3	Yellow	Yellow	Green	Green	Green	Green	Yellow	Green	Blue	Yellow	Green	Blue	Blue	Yellow	Yellow
4	Yellow	Yellow	Yellow	Green	Yellow	Red	Blue	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Blue	Red
5	Green	Green	Green	Blue	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
6	Green	Blue	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Yellow	Yellow	Yellow	Green
7	Red	Yellow	Yellow	Yellow	Yellow	Red	Yellow	Green	Yellow	Green	Green	Green	Blue	Yellow	Red
8	Green	Green	Green	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Green
9	Yellow	Blue	Yellow	Blue	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow
10	Blue	Blue	Yellow	Blue	Yellow	Blue	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow
11	Blue	Yellow	Yellow	Yellow	Green	Red	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Green	Yellow
12	Blue	Green	Green	Yellow	Green	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow	Green	Green
13	Green	Green	Green	Yellow	Green	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
14	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Yellow	Green
15	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green
16	Yellow	Green	Green	Blue	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow
17	Yellow	Green	Green	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow
18	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Yellow

Green	Positive alignment between LDP2 objective and ISA objective	Yellow	No direct link between alignment between LDP2 objective and ISA objective
Blue	Unknown alignment between LDP2 objective and ISA objective	Red	Potential conflict between LDP2 objective and ISA objective

## 5.0 LDP2 ALTERNATIVE GROWTH OPTIONS AND SPATIAL STRATEGIES

5.0.1 The SEA Regulations (12(2)b and Schedule 2(8)) require the consideration of ‘reasonable’ alternatives, the reasons for selecting them, a description of how the assessment was undertaken and noting any difficulties encountered. Alternative Growth Scenarios and Spatial Approaches<sup>8081</sup> were considered as set out below. Background information explaining the alternatives is contained within the Growth Scenarios and Spatial Approaches Background Paper<sup>82</sup>.

### 5.1 ALTERNATIVE GROWTH SCENARIOS

5.1.1 Future Wales estimates that an additional 25,600 homes are required in the South West region until 2039. This estimate provides part of the evidence to inform the setting of growth levels in respective development plans in the region. The Council’s *Economic and Housing Growth Assessment 2024* set out a range of demographic and jobs led growth scenarios for LDP2 which was subject to public consultation as part of the ‘Starting the

<sup>80</sup> [https://swansea.oc2.uk/document/10\\_vision, objectives and options for growth consultation document](https://swansea.oc2.uk/document/10_vision, objectives and options for growth consultation document)

<sup>81</sup> [https://swansea.oc2.uk/document/12\\_Growth scenarios and spatial approaches](https://swansea.oc2.uk/document/12_Growth scenarios and spatial approaches)

<sup>82</sup> <https://swansea.oc2.uk/document/12>

*Conversation on Vision, Objectives and Options for Growth* between April to June 2024. The proposed level of homes within each scenario are lower than that adopted in the current LDP. Two of the scenarios (2 and 3) are based on demographic (population) forecasts and the two (1 and 4) on jobs led economic forecasts. The Assessment also considered for comparison purposes the 'Average housing delivery (2010-23)', 'Adopted LDP requirement' (2010-2025) and . , two additional alternative scenarios based on the Welsh Government (WG) Low variant demographic projections and High variant demographic projections. All eight alternative growth scenarios are presented within Table 7. A background paper, *Options for Growth and Spatial Approaches, December 2024* provides details of the full range of options and approaches considered. Growth scenarios 1-4 require between 11 and 25.2 hectares of additional B class land in order to accommodate future job growth (explained within the Economic and Housing Growth Assessment July 2024<sup>83</sup>).

**Table 7: Alternative Growth Scenarios**

Scenario based on...	Homes per year	Homes 2023-38	Employment 2023-38
1. Baseline economic forecast	514	7,710	7,875
2. Long-term population growth trend	562	8,430	8,085
3. WG principal population projection	634	9,510	8,415
4. Higher economic growth	634	9,510	10,238
<i>Comparisons...</i>			
<i>Average housing delivery (2010-23)</i>	485	7,275	6,480
<i>WG Low variant demographic projection</i>	416	6,240	6,480
<i>WG High variant demographic projection</i>	801	12,015	10,350
<i>Adopted LDP requirement</i>	1,040	15,600	13,600

5.1.2 The need to increase levels of affordable housing in the County is a key issue highlighted in the ISA Scoping Report. An **affordable housing led scenario**<sup>84</sup> was considered but due to the complexity of modelling the interrelationship between the need for housing and the need for affordable housing specifically which can already be based on the demographic scenarios was not taken forward. However, scenarios 1-4 consider the impact of improved household formation in younger age groups accounting for the potential consequences of worsening housing affordability on these age groups over the last 15 years.

#### Comparison scenarios

5.1.3 Taking forward the **adopted LDP rates** (15,600 new homes) and employment growth forecast (13,600 jobs) would continue the 'business as usual' approach. However the LDP is required to use the WG Growth Projections as a starting point which are lower than the current LDP adopted rates both housing and employment growth. This scenario was therefore discounted as a realistic alternative and not considered further as part of the ISA.

5.1.4 The **Average Housing Delivery** scenario reflects the rate of housing delivery between 2010 and 2023 (a 'dwelling-led' scenario) of 485 homes per annum. This is less than the growth presented in growth scenarios 1-4, resulting in lower population growth needed to support

<sup>83</sup> [Preferred strategy - Swansea](#)

<sup>84</sup> *Economic and Housing Growth Assessment 2023*

the baseline level of economic growth contrary to LDP2’s vision and objectives, Future Wales and the National Growth Area aspirations. Similarly, the **WG Low variant demographic projection** scenario predicts an even lower level of housing growth which is not a realistic option. Both scenarios are therefore discounted as a feasible, realistic alternative options and are not considered further via the ISA.

5.1.5 Conversely, the **WG high variant demographic projection** would deliver higher economic growth but requires housing growth above past delivery trends, which is not achievable due to the constraints that apply. The scenario provides a similar number of new jobs as the higher economic growth scenario (4) but requires more dwellings due to the differences in age profiles of the population so is not considered an integrated and sustainable employment/housing growth strategy. The scenario was also discounted as a feasible, realistic alternative option and was not considered further via the ISA.

Comparison of Alternatives Growth Scenarios

5.1.6 Consequently all four of the above comparison scenarios were discounted as not feasible or realistic and not considered further via the ISA. Alternatively, scenarios 1-4 are considered realistic and reasonable, based on economic and demographic scenarios and were subject to ISA as outlined below. Table 8 shows the outcome of the appraisal of growth scenarios 1-4 against the ISA objectives.

**Table 8: Appraisal of Alternative Growth Scenarios 1-4 against ISA Objectives.**

Alternative Growth Scenarios (2023-2038)	ISA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1 Baseline economic forecast (7,710 homes and 7,875 jobs)	++	--	--	--	+/-	-	?	?	-		+	?	?	?	+	
2 Long-term population growth trend (8,430 homes and 8,085 jobs)	+	-	-	-	+/-	-	?	?	-		+	?	?	?	+	
<b>BASELINE</b> 3 WG principal population projection (9,510 homes and 8,115 jobs)	-	++	+	+	+/-	-	?	?	-		-	?	?	?	-	
4 Higher economic growth (9,510 homes and 10,238 jobs)	--	++	++	++	+	--	?	?	+		-	?	?	?	--	

**ISA of Growth Scenarios 1-4 – Summary**

5.1.7 The LDP is required to use the WG Growth Projections as a starting point and as such ‘Growth Scenario 3 WG Population Projection’ is the baseline against which the other scenarios are compared. Each scenario would deliver a level of housing and economic growth over the plan period. In summary, the four Growth Scenarios present the following issues and opportunities:

- Growth Scenarios 1 and 2 have potentially the most positive effect on the County's biodiversity and landscape and have potentially the best potential to support renewable and low carbon energy generation (compared to option 3). However neither Scenario provides sufficient housing to meet identified needs, including affordable housing and therefore are likely to exacerbate existing socio-economic and equality issues within the County, such as the retention of young people and access to housing. Potentially this would result in a rise in commuting in order to access employment. Both Scenarios provide for lower employment growth than Scenario 3 but provide sufficient employment opportunities reflecting the ambitions of the NGA. The level of growth under Options 3 and 4 are more likely to deliver these social and economic benefits.
- Scenario 3: has potential negative effects on biodiversity, landscape and soils. It may also potentially lead to the most need to travel, due to insufficient housing constructed to align with jobs growth, with resultant potential negative impacts on air quality which can be mitigated by sustainable site location and access to public transport and active travel routes and increased GI provision. However, it does provide a sufficient level of housing and a level of economic growth.
- Scenario 4 delivers the same level of housing growth as Scenario 3, plus a greater level of employment growth so has potentially positive effects on housing, economy, and equality and social inclusion and meets objectives of the NGA. Conversely, if there is greater number of jobs created than housing provision, there may be a rise in commuting due to the level of housing not generating a sufficient labour force to meet needs. However it has potentially the most negative effects on biodiversity and landscape compared to other Scenarios. These could be avoided or mitigated by sustainable site selection with consideration of ecological and landscape impacts. The Scenario will potentially result in greatest soil loss (greenfield land), due to growth levels, which may be partly mitigated by maximising use of previously developed land.

5.1.8 The impacts of the Scenarios on water supply and quality, waste, the historic environment, natural resources are unknown at this stage, but their potential effects could be mitigated by careful site selection and design and construction techniques that seek to minimise consumption. The potential effects on the Welsh language will depend somewhat on the location and levels of growth as will the potential effects against the ISA climate change objective.

5.1.9 The growth scenarios are considered without knowledge of spatial location of growth and it was difficult to subject the growth scenarios to a robust ISA assessment due to the level of assumption involved. For example the impact of the scenarios on many of the ISA objectives, such as on water, air quality or landscape.

## **5.2 ALTERNATIVE SPATIAL APPROACHES**

5.2.1 The spatial approaches consider where the identified need for housing and employment land (between 7,710-9,510 new homes and between 11 ha and 25ha of employment land) could be located in the County. The housing provision will not all be on new site allocations as there are existing sites with planning permission that have not yet started construction

and future unknown 'windfall' sites which will contribute to the delivery of new homes and employment development.

5.2.2 Seven Strategic Housing Policy Zones (SHPZs) are identified in the current LDP based around groups of wards with similar characteristics known as 'housing market areas' (HMAs) and the SHPZ boundaries have been amended to reflect changes in ward boundaries (Figure 4). Some 23% of residents live within the Central HMA and 21% live within the North HMA. The Greater North West and the West both accommodate 17% and the East accommodates 16% of residents. Gower and Gower Fringe are less populated each accommodating only 3-4% of the total population.

5.2.3 Five reasonable and realistic alternative spatial approaches to provide future growth were considered and subject to public consultation between April – June 2024<sup>8586</sup>, including consideration of the continuation of the existing spatial strategy (representing business as usual):

1. **Urban Brownfield:** development focused in urban centres, on brownfield land and existing greenfield commitments. Potential growth opportunities on viable and deliverable brownfield sites within the main urban centres and settlements within existing urban and village boundaries. Opportunities likely to exist within SHPZs Central, East, North, West, Greater North West, but limited opportunities in Gower Fringe and Gower
2. **Strategic Placemaking:** This is the existing strategy of the LDP (therefore considered to represent '*business as usual*') focusing on a significant number of strategic sites at key locations including on the edge of the urban area for both residential and mixed- use development. Potential growth opportunities on viable and deliverable sites at strategic locations with good access to services capable of delivering Placemaking at a strategic scale. Opportunities within SHPZs East, Central, North, Greater North West, but fewer opportunities within West, Gower and Gower Fringe.
3. **Dispersal:** focuses on a higher number of smaller scale sites and a much more dispersed approach to growth across the County with potential growth opportunities on viable and deliverable sites in all settlements in all SHPZ's
4. **Highly Connected Communities:** development focused on highly connected sustainable sites that would promote a reduction in car use. Potential growth opportunities on viable and deliverable sites well served by services and transport networks or have the economies of scale to create sustainable 15/20-minute neighbourhoods. There are opportunities within all SHPZs apart from Gower Fringe and Gower
5. **Housing Need Clustering:** Development focused in areas of greatest identified housing need as defined by the Local Housing Market Assessment (LHMA). Potential growth opportunities are on viable and deliverable sites that can provide maximum affordable

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<sup>85</sup> [https://swansea.oc2.uk/docfiles/12/GSA\\_SwanseaLDP2\\_May2024.pdf](https://swansea.oc2.uk/docfiles/12/GSA_SwanseaLDP2_May2024.pdf)

<sup>86</sup> <https://swansea.oc2.uk/document/10>

housing within settlements, village boundaries and outside settlements in sustainable locations well located to the urban area. The LHMA indicates greatest affordable need is within the Central and North followed by East, West, Greater North West, Gower Fringe and Gower.

## Assessment

5.2.4 The five spatial approaches were assessed at a very broad level prior to the previous consultation. Table 9 sets out further clarity regarding the likely impact of each of the Approaches on the ISA objectives. The assessment sheets are in the Appendices of the full ISA report.

**Table 9: Comparison of Alternative Spatial Approach**

Spatial Approach	ISA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Urban Brownfield	+	--	--	-	-	+	?	+/-	++	?		?	+	+/-	+/-	-
Strategic Placemaking (existing LDP strategy)	--	+/-	+/-	+	+	-	?	?	+/-	?		?	-	?	-	+/-
Dispersal	--	+	++	+/-	-	-	?	?	-	?		?	-	?	-	+
Highly Connected Communities	-	+/-	+/-	+/-	+/-	-	?	-	+/-			?	-	+	-	
Housing Need Clustering	-	+	++	+/-	+/-	-	?	-	-		?	?	-	+	-	

5.2.5 Spatial Approach 2 ‘Strategic Placemaking’ is considered to represent the current spatial approach, and is therefore considered the baseline, with the remaining four approaches scored against this one, considering potential impacts compared to the current situation. The approaches are considered without detailed knowledge of the spatial location of growth, level of growth or type of development proposed, so it was difficult to subject them to a robust ISA assessment due to the level of assumption involved. A summary of the assessment is provided below.

## 5.3 SUMMARY OF ASSESSMENT

5.3.1 Overall, spatial **Approach 2** performs well against the ISA framework, in particular in terms of economic growth and health and wellbeing, compared to the other approaches. There is also some positivity and negativity against biodiversity, equality and social exclusion, the need to travel and Welsh language objectives. Further details are required to ensure that any negative impacts are avoided or mitigated where possible, at Deposit Plan, site allocation and development stages. **Approach 1** compared poorly when compared to Approach 2 against housing, equality and social exclusion and Welsh language objectives, but performs better with regard to potentially reducing peoples need to travel.



- 5.3.2 **Approach 2** provides new homes and employment opportunities on a small number of large sites, which will deliver highest amount of affordable housing with *short and long term positive impacts* on meeting peoples housing needs but may not deliver throughout the County. In comparison **Approaches 3 and 4** meet housing and employment needs across the County, helping address social inequalities and providing access to affordable housing, but may not provide sites of sufficient size to deliver significant amount of affordable housing, other community and infrastructure benefits or employment sites of sufficient size and in appropriate locations to meet needs, whilst **Approach 1** focuses on sites within existing urban areas.
- 5.3.3 **Approach 4** seeks to develop within and around existing settlements, active travel routes and transport links which reduce the need to travel (thus reducing private car use) with some positive effects on air quality and would help promote an active and healthy lifestyle. However, increasing densities may have negative short and medium impacts on air quality depending how quickly modal shift occurs. This is similar to **Approach 2** which may increase travel into the city centre and other established centres in order to access service and employment if they are not delivered on sites. Much would depend on the phasing of development and societal shifts in modes of transport, as well the delivery and maintenance of public transport routes. **Approach 1** performs best with regard to reducing the need to travel as it seeks to develop within existing urban areas.
- 5.3.4 Four spatial approaches will have a long term negative effect on biodiversity and soil as they will involve the loss of greenfield sites and permanent sterilisation of soil resources due to built development. **Approach 1** is the most positive, with a focus on brownfield sites, but it is likely (but unknown at this stage) that the development of brownfield sites may also have a *short term negative effect* on biodiversity as many brownfield sites are ecologically rich. *Short term negative effects* would occur alongside site clearance and construction, but there are opportunities for *long term positive effects* due to biodiversity enhancement and the embedding of GI into development. Performance against this sustainability objective is largely dependent on site selection and implementation due to the localised nature of these features and so appraisal of impact at this strategic level is difficult. National Planning Guidance requires all development to mitigate against biodiversity loss and result in net gain and the introduction of GI may potentially increase the diversity of habitats and species on a site, *resulting in immediate and long term positive effects*.
- 5.3.5 Performance against sustainability objectives relating to climate change and renewables is largely dependent on type of development proposed, site selection and implementation and appraisal of these impacts at this stage is difficult.
- 5.3.6 With regard to the Welsh language, Approach 2 will result in significant number of houses may have *negative long term effects* upon the language, particularly in the north west SHPZ if new residents are not Welsh speakers. Conversely, greater amounts of affordable housing, local employment, schools and community facilities may help promote and enhance the language with *positive effects in the medium and long term*. Compared to Approach 2, Approach 3 allows a reasonable level of growth to support and sustain Welsh language in Welsh speaking communities with positive long term effects., conversely

Approach 1 may not achieve sufficient levels of housing, including affordable housing, in areas together with supporting infrastructure to help maintain the Welsh language.

### **Cumulative, Synergistic and Indirect Impacts**

5.3.7 These are difficult to assess as much is dependent on the impact of Westminster and WG policies, migration levels into and out of the County, and economic factors as a greater availability of jobs etc may increase population, retain younger age groups and thus over the long term potentially impact on birth rates, education needs and so on. Conversely population loss may occur due to economic decline, most likely in younger age groups and those seeking employment, leading to an older population and associated impacts on health and social services, and socio-economic disadvantages associated with unemployment if employment levels decrease. The impacts of major job losses at TATA steel in Neath Port Talbot are not yet known but are expected to be wide ranging and impact on a regional scale. Neighbouring authorities land use planning strategies will also have an impact on the County, as will other plans and strategies, for example Swansea Bay Health Board, the regional Metro project, or large offshore energy projects which may impact on the docks and surrounding areas. Societal and behavioural impacts will also influence the outcomes of the LDP, for example the take up of active travel or public transport rather than private cars, the use of EL vehicles, take up of renewables and moves towards net zero.

## **6.0 THE PLACEMAKING STRATEGY FOR ABERTAWE 2038**

### **6.1 PREFERRED STRATEGY VISION**

6.1.1 The previous LDP2 Vision has been amended to encompass consultee comments, including ISA recommendations (Appendix E of full ISA Report). Further amendments were undertaken as a result of the ISA and the Preferred Strategy Vision is:



**'Abertawe 2038'** will be a thriving coastal city of innovation and creativity at the heart of the Swansea Bay and Llanelli National Growth Area, where people can enjoy a high quality of life in outstanding natural and built environments. Placemaking, climate resilience and biodiversity enhancement will be the foundation principles for new development, helping to create places that encourage healthy living and enhance people's well-being. Swansea City Centre and its adjoining waterfront areas will be vibrant, mixed-use destinations offering a unique range of leisure opportunities, commercial services and open spaces alongside high density urban living. These areas will be complemented by a network of neighbourhoods of distinct character across urban and rural locations where communities can thrive, offering a range and choice of high-quality homes in safe environments, well connected to day-to-day services, facilities and employment opportunities. Residents and visitors will have good access to enhanced natural environments, including the area's spectacular coastline and rural hinterlands, and to Swansea's diverse range of cultural and heritage assets. Places will benefit from an abundance of multi-functional green infrastructure and resilient ecosystems at all scales, which alongside sustainable forms of growth and transformative investment will help support Swansea's transition to net zero

6.1.2 A comparison of the ISA outcomes between the consultation version in May 2024 and the above version is presented in Table 10, though as different scoring matrices were used they

are not directly comparable. The ISA concludes that the Vision successfully addresses aspects of sustainable development, including positive social, economic and environmental benefits. The Vision is expressed as 'Abertawe 2038' to embrace the County's cultural heritage and be reflective of wider aims to increase the number of Welsh speakers over the Plan period and beyond. Impacts upon soil resources, waste and minerals are unknown at this stage and further details are required detailing location of growth, type of growth and specific policies and site allocations.

**Table 10: ISA scoring of May 2024 draft Vision and Preferred Strategy Vision**

	ISA Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16 (New)	
<b>KIVO Draft Vision 2024</b>	+	+	+	+	+	?	+	+	+	+	+	+	+	+	+	+	+
<b>PS Vision 2024</b>	++	++	+	+	++	?	+		++	++	+	?	?	+	+	+	+

Scoring for May 2024:

+	Positive alignment between LDP2 objective and ISA objective	+	No direct link between alignment between LDP2 objective and ISA objective
?	Unknown alignment between LDP2 objective and ISA objective	+	Potential conflict between LDP2 objective and ISA objective

## 6.2 OBJECTIVES

6.2.2 Similarly, following public consultation, the eighteen LDP objectives were revised to take account representations received. The goals of the WBFGA are embedded within the LDP objectives, and they are consistent with the Council's corporate plans and strategies, whilst reflecting national policy, including Future Wales. Further details on the LDP objectives is in the Compatibility Analysis and Alignment of Key Issues, Objectives and Strategic Policies' (December 2024) Paper. The 18 LDP Objectives are grouped under the summary headings of the 4 local Well-being Plan objectives:

### **Building Cohesive and Resilient Communities**

*Objective 1: Deliver transformational change through regeneration*

*Objective 2: Prioritise Centre's First*

*Objective 3: Provide for sustainable economic activity and good quality jobs*

*Objective 4: Enhance the visitor economy*

### **Addressing Climate Change and Delivery Nature Recovery**

*Objective 5: Respond to the Climate Emergency*

*Objective 6: Respond to the Nature Emergency*

*Objective 7: Enhance the use and production of Renewable and Low Carbon Energy*

*Objective 8: Delivery sustainable settlement growth*

*Objective 9: Facilitate transition to a Circular Economy*

*Objective 10: Ensure Sustainable Use of Mineral Resources*

### **Creating Great Places to Live Well at Every Stage of Life**

*Objective 11: Enhance delivery of new homes to meet needs*

*Objective 12: Embed Placemaking*

Objective 13: Facilitate a modal shift to Active Travel and Sustainable Transport Modes

Objective 14: Enhance infrastructural capacity

Objective 15: Conserve and enhance the cultural and historic environment

Objective 16: Promote and safeguard the Welsh language

**Enabling access to opportunities from earliest stages of life**

Objective 17: Promote well-being and equality

Objective 18: Ensure good connectivity to local services and community facilities

6.2.3 The revised LDP2 objectives were assessed via the ISA objectives and a summary is shown in Table 11. At this stage, many of the outcomes of the LDP2 objectives are unknown and are dependent on other factors such as policies in the Deposit LDP2, site allocations, type of development or location. Overall, the 18 Objectives score positively against the ISA objectives with only five potential negative scores highlighted. The various aspects of sustainability as presented within the ISA objectives have therefore been addressed and considered within the objectives of LDP2.

**Table 11: Preferred Strategy LDP2 Objectives against ISA objectives**

LDP 2 Objectives	ISA objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1			++	++					+	-	?	?	?	++	++	+/-
2			+/-	++	+	+			++	-	?	?	?	?	?	+/-
3			++	++					+/-				?		?	+
4		+/-	+/-	+					-			x	?	+/-	+/-	+/-
5	++	+	+		+			?		++	++	+	+	?	+	x
6	++	+/-	+		+	+	++	++		+			+/-	+	++	x
7	?		+		x			++		++	++	+		+/-	-	x
8		++	+	++		+			+			x				
9		x	x		x		+	x	x	++	+	++	+	+	?	x
10		+	x	+	x	?		?	?	?	+	++	++	+	-	x
11		++	++	+	++				++		+			+/-	?	+/-
12		+	+		++	0		+	+						?	x
13		x	++		+	?	x	++	++	++	x	x		0	?	x
14		++	++	++			++	x	++	+	++	++		0	?	x
15		+/-	+	+		0	?		+/-		+/-	+	0	++	++	++
16	x	+/-	+	+	x	x	x	x	x	x	x	x	x	++	x	++
17	+	++	++	++	++	0	++	++	++		++	+		+	+	++
18	+	++	++	+	++			+	++	?	x	+		++	?	++

- LDP2 Objectives 1 -4 grouped under 'building cohesive and resilient communities' score positively against economic objectives. The assessment reflects the fact the city centre is partly located within a flood risk area and further details are required to inform LDP2. Increasing both visitor numbers and residents may increase pressure on the National Landscape with resultant detrimental impacts and care must be taken to ensure the natural landscape capacity and sensitivity of the area is respected.
- LDP2 Objectives 5 – 10 grouped under 'Addressing Climate Change and Delivering Nature Recovery' score positively against biodiversity, health and wellbeing, climate change and air

quality ISA objectives. There are potential negative impacts on landscape, seascape and townscape as a result of new renewable or low carbon energy infrastructure, mineral workings and increased recreational pressure from resident population and visitors.

- LDP 2 Objectives 11-16 grouped under *'Creating great places to live well at every stage of life'* are positive in relation to ISA objectives for housing, employment and economic growth, social inclusion and equalities, air quality, water and climate change. Objectives 17 and 18, grouped under *'Enabling access for all from the earliest stages of life to great opportunities'* scores well against the majority of the ISA objectives, with no potentially negative scores.
- ISA objective 8, scores well against half of the LDP2 objectives, with a further 6 requiring further information such as type of development, how it will be implemented etc. Thus highlighting that consideration of equalities, health and wellbeing are embedded throughout the LDP objectives.
- Considering the Welsh language, many LDP2 objectives are not directly relevant and similarly many of the ISA objectives are not directly relevant to LDP2 objective 16. LDP2 objectives in relation to culture and heritage scored positively. Regeneration and new development may help retain people in a community, but LDP objective 1 does not mention housing, so it would depend on the type of development and its location. Too much new development may overwhelm a community, but conversely may offer opportunities for social infrastructure such as new schools, community centres etc.

**Table 12: Compatibility Of LDP2 Objectives**

LDP objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
1	Black	Green	Green	Green	Light Blue	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green
2	Green	Black	Green	Green	Light Blue	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Green	Green
3	Green	Green	Black	Green	Light Blue	Yellow	Green	Green	Green	Green	Light Blue	Light Blue	Light Blue	Green	Yellow	Green	Green	Green
4	Green	Green	Green	Black	Light Blue	Light Blue	Yellow	Green	Yellow	Yellow	Light Blue	Yellow	Light Blue	Green	Green	Green	Yellow	Yellow
5	Light Blue	Light Blue	Light Blue	Light Blue	Black	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow
6	Light Blue	Yellow	Yellow	Light Blue	Green	Black	Light Blue	Light Blue	Yellow	Light Blue	Light Blue	Green	Green	Light Blue	Yellow	Green	Green	Green
7	Green	Yellow	Green	Yellow	Green	Light Blue	Black	Yellow	Green	Light Blue	Green	Green	Green	Green	Light Blue	Yellow	Green	Yellow
8	Green	Green	Green	Green	Green	Light Blue	Yellow	Black	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green
9	Green	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Black	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
10	Green	Yellow	Green	Yellow	Green	Light Blue	Light Blue	Yellow	Green	Black	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow
11	Green	Yellow	Light Blue	Light Blue	Green	Light Blue	Green	Green	Yellow	Green	Black	Green	Green	Green	Green	Green	Green	Green
12	Green	Green	Light Blue	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Green	Black	Black	Green	Green	Yellow	Green	Green
13	Green	Green	Light Blue	Light Blue	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Black	Green	Green	Yellow	Green	Green
14	Green	Yellow	Green	Green	Green	Light Blue	Green	Yellow	Yellow	Green	Green	Green	Green	Black	Yellow	Yellow	Green	Green
15	Green	Green	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Black	Green	Green	Green
16	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Light Blue	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Green	Black	Green	Green
17	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Black	Green
18	Green	Green	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Black

Green	Strong compatibility
Yellow	Neutral/no clear link
Light Blue	Potential incompatibility – consider mitigation (e.g. through policy)

6.2.4 An assessment of the compatibility of the eighteen LDP2 objectives was undertaken at this stage and a summary of the scoring of the objectives set out above is presented in Table 12. Overall the objectives are compatible with each other. There are some inherent potential incompatibility issues, such as growth and development against protection of landscape and biodiversity; or reducing the need to travel and reducing carbon emissions with encouraging and growing the visitor economy (which will encourage travel). However, without further details regarding location and type of growth and mitigation measures the impacts are unknown at present.

### 6.3 THE LDP2 PREFERRED STRATEGY

#### Growth Scenario

6.3.1 As a result of the ISA of the alternative growth scenarios and consideration of other plans and strategies, the Preferred Strategy will follow growth **Scenario 4: Higher Economic Growth**, facilitating the delivery of **11,410** new homes to 2038 (including a 20% flexibility allowance to allow for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.) and the creation of **10,238** net jobs, alongside allocating 25ha of employment land. This reflects the County's location within the NGA and as an economic driver for the Swansea Bay City Region.

#### Spatial Approach

6.3.2 As a result of the ISA of the alternative spatial approaches, stakeholder engagement and consideration of the spatial strategy of the current LDP, it is recommended that a hybrid option is considered as the preferred spatial approach for LDP2, mainly consisting of **Approaches 2: Strategic Placemaking and 4: Highly Connected Communities**, together with the strongest elements of the other 3 approaches (Table 13). The fact that the existing spatial strategy of the current LDP is sound was also a key consideration and continuation will provide consistency for developers and certainty for residents. Some sites have full or outline planning consent whilst other planning applications are advanced with confidence they will be developed. The approach will also enable the delivery of 25ha of employment land via a range and choice of employment sites at strategic locations across the County to support sustainable economic growth.

6.3.3 However, in order to ensure that growth is sustainable throughout the County, not all growth will be on new (or existing) strategic sites. Approaches 2 and 4 are supplemented by elements of Approach 1 urban brownfield, Approach 3: Dispersal and Approach 5: Housing Need in order to ensure that housing and employment needs are met throughout the County and in rural and semi rural areas.

6.3.4 The hybrid spatial approach:

- Large strategic residential and mixed-use led development areas supported by development around and within (including on previously developed land) in existing urban neighbourhoods and centres with services, facilities and good public transport and active travel links (approach 2 and 4)
- Prioritising the re-use of previously developed land, including maximising opportunities for redevelopment within defined centres, for example through infill

redevelopment opportunities and above shop conversions, but supporting greenfield opportunities where these are necessary to deliver on the strategy;

- Seek to provide a range and mix of site sizes which reflects the settlement strategy and role and function of places, with strategic scale releases as well as sites that can be attractive to SME scale developers,
- Provide small scale development in semi rural and rural areas through providing opportunities at appropriate sites within established well serviced settlements in accordance with the Settlement Strategy that will deliver high proportions of affordable housing and meet the identified need set out in the LHMA, (approach 3)
- Due to viability, ability to maximise affordable housing on SPRA's, whilst delivering affordable housing to semi rural and rural areas to meet demand (approach 5).

**Table 13: Comparison of the Alternative Spatial Approaches including Hybrid Approach**

Spatial Approach	ISA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Urban Brownfield	+	--	--	-	-	+	?	+/-	++	?		?	+	+/-	+/-	-
Strategic Placemaking (existing LDP strategy)	--	+/-	+/-	+	+	-	?	?	+/-	?		?	-	?	-	+/-
Dispersal	--	+	+	+/-	-	-	?	?	-	?		?	-	?	-	+
Highly Connected Communities	-	+/-	+/-	+/-	+/-	-	?	-	+/-			?	-	+	-	
Housing Need Clustering	-	+	++	+/-	+/-	-	?	-	-		?	?	-	+	-	
Hybrid Approach (PS)	+/-	++	++	++	+	-	?		++	?		?	+/-	+	+/-	+/-

### Summary

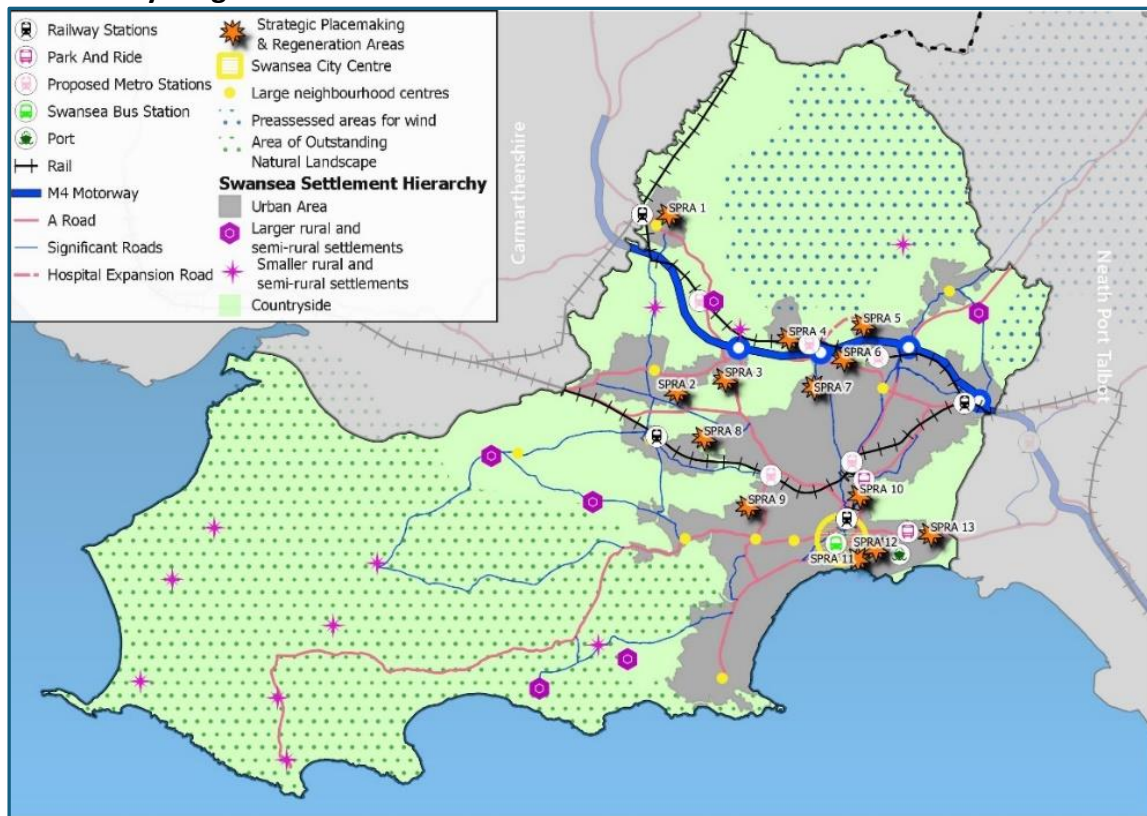
6.3.5 Not one single Scenario or Approach provided the growth and spatial strategy that met the Council's priorities and ambitions, or those of Future Wales. The **Placemaking Strategy for Abertawe 2038'** is a hybrid approach with the Connected Communities and Strategic Placemaking approaches as the primary focus and is considered the most appropriate to deliver on achieving the overarching Vision and Strategic Objectives for the plan. Figure 5: the Key Diagram illustrates the Preferred Strategy.

6.3.6 Growth Scenario (4) Higher Economic Growth delivers the same level of housing as Growth Scenario 3 with a greater level of employment growth, so has potentially positive effects on housing, economy, wellbeing, equality and social inclusion ISA objectives and meets objectives of the NGA and City Deal. The Strategy seeks to develop strategic sites with potential to include affordable housing and new social and community infrastructure together with a range and choice of site sizes located in areas highly connected to service and facilities within the urban area and at edge of settlement locations reflecting the role and function of settlements and creating and enhancing healthy environments. The ISA notes that accessibility to services, and meeting affordable housing need are potentially problematic in rural areas which can impact on residents wellbeing and equality of services



which must be considered in the policy framework in the Deposit Plan. There are likely negative effects on biodiversity and landscape compared to other Scenarios, which can be avoided or mitigated by sustainable site selection with consideration of ecological and landscape impacts. It will potentially result in greatest soil loss (greenfield land) which may be partly mitigated by maximising use of previously developed land. There are socio-economic benefits, for example by retaining younger cohorts there may be likely positive impacts on the Welsh language as these age groups show an increase in Welsh speakers between 2011 and 2021 (16-44 age groups). Also potential to 'attract/appeal' to those that may have moved away e.g. University/early career but are now looking to return to the County – noting the 20/44 age group trend.

**Figure 5: The Key Diagram**



6.3.7 The policy framework of the Plan will also need to address matters for which insufficient information is provided at this strategic level to fully assess against ISA objectives:

- Climate Change
- Renewable Energy;
- Waste and the circular economy;
- Air
- Mineral Resources, and
- Water

6.3.8 It is also difficult to determine and predict what effects are attributed to economic, social, and environmental uncertainties, alongside factors such as changes to national level policy at this strategic stage.

## KEY SITE ALLOCATIONS

6.3.9 The strategy for the distribution of growth includes existing strategic placemaking commitments within the Greater North West Zone SHPZ, the North SHPZ and the Swansea Central Area, which have not been assessed as part of this ISA as they already have planning consent.

6.3.10 No candidate sites have been assessed at this stage. Areas of 'potential strategic development opportunities' (Strategic and Placemaking Regeneration Areas) (areas with no clear boundary) are shown on the key diagram but have not been subject to ISA at this time.

## 7.0 STRATEGIC POLICIES

7.0.1 Some 19 draft Strategic Policies were appraised against the ISA framework to consider whether they would result in likely significant effects (Table 14). The policies and appraisal matrices are within Appendices of the full ISA Report.

**Table 14: Assessment of Original draft Strategic Policies against ISA Objectives**

Strategic Policies	ISA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	--	++	++	+	+	--			++	+	x	x	-	x	-	+/-
2	-	?	?	?	x	-				x	x	x	-	x	?	?
3	-	+	+	+	++	-				x	x	x	-	?	-	++
4	+	++	++		++	x				+	x	x	x	x	+	x
5	+	++	+		++	-	x		++	+	x	x	-	x	+	
6	?	?	+	x	+	x	+	x	?	++	x	x	x	x	x	+
7	--	++	+/-	++	++	--				+	++	x	--	x	-	+/-
8	+	+	+	++	+/-	+	-		++	-	x	x	x			?
9	x	x	+	++		+	-	?	+	-	x	x	x			?
10	+	x	+	++	x	?	?	x	+	+	+	x	?	x	+	x
11	+/-	x	+	++	x	-	x	x	+/-	-	x	x	x	+/-	++	+/-
12	++	+	+	?	+	++	++	++	++	++	++	++	+	++	?	x
13	?	+	+	x	+	x	x+	+	x	+	+	x	x	x	?	x
14	++	+	+		++	+	++	+	x	++	x	x	x	+	+	x
15	++	?	+	+	++	+	+	+	x	++	x	x	x	+	++	x
16	x	x	+	+	x	x	x	x	x	+	+	x	x	++	+	x
17	x	x	++	x	+	x	x	x	x	x	x	x	x	++	x	++
18	+	x	x	+	++	+	x	x	x	++	x	++	++	x	+	x
19	+	x	x	+	++	+/-	++	++	++	+	x	++	++	++	++	x

7.0.2 The appraisal resulted in amendments to the policies, for example small wording changes to make the policies more understandable. Others were more significant, such as the addition of a further two policies: Safeguarding the County's Landscape (as there was no specific reference to the Gower Area of Outstanding Natural Landscape) and Masterplanning and Residential Development. The 21 amended and new Strategic Policies are set out in Appendices of the full ISA Report, together with the matrices of their reassessment against the ISA Framework. Table 15 summarises the scores of the policies after re-assessment, where necessary. Table 16 provides commentary, including a brief explanation of the main changes to the strategic policies resulting from the ISA process.

7.0.3 In implementing LDP2, all policies should be read collectively and no one policy should be considered in isolation. For this reason, due to the 'protective' and prescriptive nature of some policies, they can provide mitigation for potential negative effects in the implementation of other policies.

**Table 15: Final Strategic Policy Assessments**

Strategic Policy	ISA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	--	++	++	++	+	--			++	+	x	x	-	x	-	+/-
2	-	+	+	+	x	-			+	x	x	x	-	x		+/-
3	-	++	++	+	++	-				x	x	x	-	?	-	++
4	++	++	++		++				+	++	+	++	++	+	++	+
5	++	++	+		++	-	x		++	+	x	x	-	+	+	x
6			+	x	+	x	+	x		+	x	x	x	x	x	+
7	x	x	++	x	+	x	x	x	x	x	x	x	x	++	x	++
8	--	++	+/-	++	++	--				+	++	x	--		-	+/-
9	+	++	++	++	+	+	-	+	++	-	x	x	x	+		?
10	x	x	+	++		+	-	?	+	-	x	x	x			?
11	+/-	x	++	++	+	-	x	x	+/-	-	x	x	x	++	++	+
13	++	+	++	+	++	-	++	++	++	x	x	x	-	x	+	
14	x	+	+/-	x	+	x	x	+	++	+	+	x	x	x	?	x
15	++	+	+	?	++	++	++	++	++	++	++	++	++	+	++	?
16	++	+	+		++	+	++	+	x	++	x	x	x	+	+	x
17	++	?	+	+	++	+	+	+	x	++	x	x	x	+	++	x
18	++	x	x	x	+	++	x	x	x	+		x		++	++	x
19	x	+	++	+	x	x	x	x	x	+	+	x	x	++	+	++
20	+	x	x	+	++	+	x	x	x	++	x	++	++	x	+	x
21	+	x	x	+	++	+/-	++	++	++	+	x	++	++	++	++	x

**Table 16: Commentary on Strategic Policies, Including Amendments to the Policy as a Result of ISA**

SP1 Growth Strategy
<p>Policy now includes reference to settlement strategy and hierarchy of centres within employment section, so positive likely effect against employment ISA objective is greater. Minor grammatical changes to policy, but do not impact on outcome of policy so scoring is the same, with positive likely effects against ISA Objectives relating to housing supply, health and wellbeing, equality and social exclusion, reducing the need to travel and climate change as it focuses on provision of housing and employment in accessible areas that conform with the settlement strategy. Additional greenfield land development will have negative effects on biodiversity, soil, landscapes and natural resources due to the potential sterilisation of minerals. Job creation and affordable homes will help retain younger age groups - which have experienced a growth in Welsh speakers as well as potentially attracting working age groups back to the County. Provision of affordable housing etc is positive, but consideration will be needed in regard to concerns that large development may have negative effects on the language if there is no mitigation e.g. phasing, planning condition(s) etc.</p>

Mitigation: SP2-SP8, SP12-14, SP16-18, SP21
<b>SP2 Sustainable Settlement Strategy</b>
The policy now includes greater clarity re: areas of development by identifying locations and tiers and minor grammatical changes clarify that it relates to all development, so will have positive effect against ISA objective 4. Otherwise, scoring is similar to the previous policy version but greater clarity of strategy results in positive likely effects against ISA Objectives relating to housing supply, equality and social exclusion and reducing the need to travel as it focuses on the strategic location of development. Additional greenfield development will have negative effects on biodiversity, soil and natural resources due to the potential sterilisation of minerals. Provision of affordable housing etc is positive, but consideration will be needed in regard to concerns that large development may have negative effects on the language if there is no mitigation e.g. phasing, planning condition(s) etc. Impacts on landscape, air and water will depend on how the policy is implemented and such factors as location of development or type of development.
Mitigation: SP1; SP3-SP11; SP13, SP14; SP18; SP21
<b>SP3: Affordable Homes and Specialist Housing</b>
Amended policy refers to HMOs, More Homes Programme and the LHMA, providing greater clarity and having greater likely positive effects against ISA Objectives relating to housing supply, equality and social exclusion and health and wellbeing. Additional greenfield development will have negative effects on biodiversity, soil and natural resources due to potential sterilisation of minerals. Provision of affordable housing etc is positive, but consideration will be needed in regard to concerns that large development may have negative effects on the language if there is no mitigation e.g. phasing, planning condition(s) etc. Impacts on landscape, air and water will depend on how the policy is implemented and such factors as location of development or type of development.
Mitigation: SP14; SP18; SP19; SP21
<b>SP4 Placemaking Principles</b>
Policy has been amended to provide greater detail of development requirements. Reference to developments of 100+ homes has been removed. Including reference to the nature emergency, ecosystem resilience, climate change, circular economy, landscape, sense of place, heritage and reduction in need to travel has improved scoring against most of the ISA objectives. Increasing densities in urban areas may put pressure on existing infrastructure and resources and have detrimental impacts on air quality if not accompanied by decrease in air pollution. Similarly, 15-20 min neighbourhoods may increase pressure to develop greenfield land within this 'zone'. Overall it will depend on how the policy is implemented and the ability to ensure appropriate mitigation.
Mitigation: SP5; SP13; SP14; SP17; SP20; SP21
<b>SP5 Masterplanning Residential Development</b>
A new policy, not previously assessed. Relates to developments of 50 dwellings or more. Positive likely effects against ISA Objectives relating to housing supply, equality and social exclusion, health and wellbeing and reducing the need to travel and promoting active travel and public transport. Likely positive effects against the biodiversity ISA Objective as seeks biodiversity net benefit and GI enhancement. Potential negative effects against ISA objectives relating to soil and natural resources due to potential development of greenfield sites.
Mitigation: SP4; SP16: SP17; SP20; SP21
<b>SP6 Planning Obligations for Infrastructure and Other Measures</b>
The policy is very similar to that previously assessed, but the word 'measures' has been included within the title to clarify that it does not only relate to infrastructure. Measures may include biodiversity enhancement, affordable housing etc, so likely effects against a number of ISA

objectives depend on type of development and whether those particular measures are required as part of a S106 rather than conditions for example. Policy seeks to address deficiencies in infrastructure and community facilities, so positive effects against ISA objectives relating to equality and social exclusion, health and wellbeing, capacity of infrastructure (water) and the Welsh language. Assessment reflects that the policy now refers to 'resilient' infrastructure, but not climate resilient as previously.

Mitigation: SP3; SP6; Sp13; SP16; SP17

**SP7: Safeguarding and Promoting the Welsh Language**

The policy is the same as that previously assessed. Positive likely effects on the Welsh language, culture and heritage, equalities and social exclusion and health and wellbeing.

Mitigation: SP2; SP3; SP6

**SP8: Strategic Placemaking and Regeneration Areas**

Policy has been amended to include reference to Health-led SPRAs and provides 'locations' of SPRAs, but not specific site areas. The plan discusses some 13 SPRAS, some of which already have planning consent. However, these individual sites will continue to be assessed through the iterative ISA process as the plan making process proceeds alongside the ongoing detailed assessment of candidate sites. The impacts will be as a result of the development of individual sites, cumulatively within and across SHPZs and, in some cases cross County borders. Mitigation will be required where necessary. The policy discusses the potential of some 3000 dwellings in the Greater North West and North housing policy zones (some of these already have planning consent), 600 dwellings in the central zone and 200 dwellings in the west zone. The assessment of the policy against the ISA Objectives identifies positive likely effects against ISA Objectives relating to housing supply, economic growth, health and wellbeing, equality and social exclusion, climate change and renewable and low carbon energy. Assessment of effects against cultural heritage ISA objective will depend on the detailed location of a scheme and how it is implemented as it refers to new cultural benefits for mixed use SPRAs, but doesn't mention protecting and enhancing existing assets. There is similar dependency upon implementation for ISA objectives in relation to water, air and reducing the need to travel and promoting active travel/public transport. The policy does seek to promote active travel and public transport and the scale of sites may enable a reduction in the need to travel, but conversely if facilities, public transport links and employment are not delivered, this may increase the need to travel to employment locations etc. Additional greenfield development will have potential likely negative effects on biodiversity, soil and landscape. Also there could be potential likely detrimental effects on natural resources due to the potential sterilisation of minerals. Both positive and negative effects are likely on ISA objectives relating to equality and social exclusion and the Welsh language, as SPRAs are not equally distributed throughout the County and consideration will be needed in regards concerns that large development may have negative effects on the language if there is no mitigation e.g. phasing, planning condition(s) etc. and also if there is not provision of low levels of housing in rural areas to sustain the Welsh language.

Mitigation: SP3, SP7, SP14 -SP18, SP21

**SP9: Swansea Central Area and City Waterfront**

Policy has been amended to include reference to city waterfront and remove reference to specific development types – such as leisure and retail, in order to ensure there is no conflict with national policy and SP10 in terms of 'centres first' approach. Positive likely effects against the majority of the ISA Objectives. Reference to both 'high density' and a 'range of density and type', has been removed for clarity, so now refers to a range of density and type. Improved likely positive effects on health and wellbeing and air quality ISA objectives by the inclusion of reference to 'healthy

cities' which was not in the previous version. The policy has been amended to include reference to cultural facilities, but doesn't mention considering impacts on historic assets/environment, townscape or seascape, so mitigation is required via other policies. As the policy now includes the city waterfront there may be detrimental effects on water in relation to surface water run off etc into the sea/ivers, as well as the fact that much of the area is located within a designated flood zone, which also has negative effects against the climate change ISA objective.

Mitigation: Policy has been reworded to remove reference to specific types of development which are subject to sequential test and Centres First approach. Must be read in connection with Future Wales, SP2, SP8, SP10, SP12 and SP15.

**SP10: Centres First**

Policy amended slightly to clarify terminology and locations and now refers to the city centre retail and leisure core rather than Swansea central area as in SP9. Amendment clarifies retail, leisure and commercial uses must follow Centres First principle. Otherwise, scoring is the same as the draft version. The city centre is partly located within a designated flood zone, which has negative effects against the climate change and water ISA objectives. Clarification on what is meant by leisure would aid scoring against the health and wellbeing objective. No reference to other topics so unable to score against ISA objectives such as biodiversity, housing or renewable energy. Clarification expected in reasoned justification to explain use of 'Neighbourhoods' rather than District and Local Centres as in PPW and current LDP and whether there are any differences to aid public understanding.

Mitigation: Future Wales, SP2, SP8, SP9, SP12 and SP15.

**SP11: Port of Swansea Docks and Regeneration**

Policy is similar to the draft version, but includes reference to renewable energy generation as well as zero carbon industries, so potential greater beneficial effect against ISA objectives 10 and 11 – climate change and renewable energy. Doesn't mention historic assets, so potential impact on historic assets, seascape and townscape can't be assessed.

Mitigation: SP1; SP14; SP18; SP19; SP21

**SP12: Tourism and the visitor Economy**

Policy is similar to previous version, but includes reference to investment, recognition that tourism facilities benefit the county's residents, and the addition of culture and Swansea as a destination for leisure and events, not just 'tourism'. Scoring similar to previous, but positive likely effect on ISA objectives relating to equality and social exclusion, health and wellbeing, Welsh language and culture improved due to inclusion of residents and reference to culture.

Mitigation: SP1; SP2; SP4; SP7; SP9; SP10; SP14; SP16; SP17; SP18

**SP13: Health and Wellbeing**

Policy has been amended to include reference to GI whilst reference to a 'range of housing opportunities' has been omitted, which is reflected in the scoring against the housing ISA objective. Expansion of Morriston Hospital including a potential new link road is likely to result in increased employment, but will have a potential negative effect on soils and natural resources. The potential likely effect on the Welsh language will depend on the implementation of the policy, e.g. potential provision of community facilities and housing.

Mitigation: SP1; SP2; SP4; SP6; SP7; SP13; SP14; SP18; SP21

**SP14: Sustainable Transport and Active Travel**

Policy amended to include reference to the Sustainable Transport Hierarchy for Planning, parking provision and alternatives to road transport for freight via the protection of port, docks, river and rail. No reference to ecology, the airport, landscape, seascapes or the historic environment. Potential impact on seascapes, so score is uncertain on this point. Measures to reduce/restrict use

of private cars, such as reduced car parking provision may have potential negative impacts on social inclusion and equalities for people who cannot use/access alternative transport options and health workers who undertake home visits.
Mitigation: SP4-SP6; SP8; SP13; SP1; SP17
<b>SP15: Climate Change and Decarbonisation</b>
Policy amended with minor text/grammar amendments. Reference to additional decarbonisation burden on the County removed. Includes reference to sequestration and storage of carbon, prioritising re-use, and reference to growing spaces and tree coverage added. Policy has positive likely effects against the majority of ISA objectives, with no likely detrimental effects.
Mitigation: SP1; SP2; SP4; SP5; SP9;-SP11; SP13; SP16; SP17; SP20
<b>SP16: Facilitating Nature Recovery</b>
Policy has been amended with text/grammar alternations, but scoring remains the same as previous. However, amended policy deletes the sentence: ' <i>development will not be permitted where it will have a significant adverse effect on the resilience of protected habitats and species; or directly or indirectly on statutory (internationally and nationally) designated sites</i> '. This provided a clear statement and aligned with HRA. Consider reinserting statement. The policy has positive potential likely effects against the majority of the ISA objectives, with no potential negative effects. The impact against the ISA economic objective depends on the implementation and outcome of the policy, as it promotes nature based solutions, which could be positive for the growth of the green economy. The policy references designated sites, which would include the AONB, historic parks and gardens etc.
Mitigation: SP2; SP4 - SP6; SP8; SP13; SP15; SP17; SP18; SP19. Reinsert deleted text to align with HRA and provide a clear statement to developers re: Habitat Regulations requirements.
<b>SP17: Green Infrastructure</b>
Policy has been amended slightly with inclusion of reference to ecological resilience, protection and enhancement of existing site features, and promotion of health and wellbeing. The scoring is the same as the previous version, with potential likely effects on most ISA objectives and no potential negative effects. Active travel routes are not specifically mentioned, but potential to improve policy if included.
Mitigation: SP2; SP4-SP6; SP13; SP14; SP15; SP16; SP18
<b>SP18: Safeguarding the County's Landscape</b>
A new policy so not previously assessed. Maintenance of landscape and seascape character would maintain and enhance physical environments that support health and wellbeing. Effect against ISA objectives relating to renewable energy and managing natural resources depends on the type of development and location. Some renewable/low carbon developments, although temporary, will have long term impacts on the landscape (+20 years). Safeguarding mineral resources for future generations has the coincidental impact of protecting the landscape against permanent development during the lifetime of LDP2 and beyond.
Mitigation: SP2; SP3; SP4; SP5; SP8; SP15; SP16; SP19; SP21
<b>SP19: Historic and Cultural Assets</b>
Amended policy which now includes specific reference to safeguarding and promoting the Welsh language and placemaking – improving potential likely positive effect against Welsh language and housing and placemaking ISA objectives.
Mitigation: SP2; SP4; SP7; SP15; SP18
<b>SP20: Facilitating a Circular Economy and Sustainable Waste Management</b>



Policy has not been amended so the assessment remains the same as previously. The policy has likely positive effects against many ISA objectives, including biodiversity, economic growth, health and wellbeing and soil resources. There are no potential likely negative effects.

Mitigation: SP4; SP13; SP15; SP21

#### **SP21: Sustainable Provision of Minerals**

Policy amendment has resulted in a slight change of wording to final sentence re: ports and docks plus inclusion of an additional paragraph relating to regional collaboration, but it doesn't change the scoring of the policy which remains same as previous. The policy mentions natural heritage but assessment against ISA biodiversity objective could be improved if biodiversity net gain is specifically referred to. No direct link to economy or housing in policy, but a lack of mineral aggregate provision will impact on house building, other developments and economic development. The promotion of secondary aggregates will have positive likely impacts on the reduction of the need for primary aggregate workings (thus protecting soil resources) but the policy does still allow for mineral working. The regional role of aggregate supply is emphasised, highlighting the cross boundary nature of mineral supply and the fact that the policy will potentially have long term impacts beyond the County.

Mitigation: SP1; SP2; SP4; SP11; SP13; SP15; SP18; SP20

## **8.0 DIFFICULTIES ENCOUNTERED AND MITIGATION**

- 8.0.1 The main difficulty encountered at this stage of the ISA process is that there is uncertainty over the exact location of development and the levels of growth in particular areas due to the strategic nature of the Preferred Strategy which does not identify sites. There is also a lack of knowledge regarding the levels of growth sought by neighbouring authorities due to various plan timescales, and the location of site allocations and what cumulative impacts these may have on the County. Therefore many of the predicted impacts are unknown and require further information, dependant on site allocations and detailed policies in the Deposit Plan or even at planning application stage.
- 8.0.2 National planning guidance and relevant legislation would help mitigate certain impacts (such as on protected habitats and species) but embedding mitigation throughout the Deposit Plan will ensure issues, such as biodiversity and habitat loss, Placemaking, traffic and highway infrastructure, health and wellbeing, Green Infrastructure and Active Travel Routes are addressed.
- 8.0.3 All policies will be reviewed as part of Deposit LDP2 preparation and will be subject to ISA again.

## **9.0 CANDIDATE SITE REGISTER**

- 9.0.1 The consideration and evaluation of 'reasonable alternatives' as part of the LDP2 process, includes the identification of development sites. Landowners, developers, and other interested parties were invited to nominate 'Candidate Sites' for potential inclusion within

LDP2 from August to October 2023. Overall 132 sites were submitted (Candidate Site Register, Dec 2024)<sup>87</sup>.

9.0.2 The Council has completed the Stage 1 candidate site assessment and rejected 18 sites not considered 'reasonable' e.g. those below a site size threshold, those with fundamental constraints such as residential sites in C2 flood plain, or if they raise significant deliverability issues (Table 17). No candidate sites have been subject to ISA assessment at this stage.

**Table 17: Candidate Site Stage 1 fails**

Site ID	Site Name	Proposed Use	Summary of Stage 1 Assessment Outcome
95	Land to the Rear of 51B Bishopston Road, Bishopston, Swansea	Residential	Fail. Fundamental deliverability constraints. Evidence submitted demonstrates suitable means of access cannot be achieved having regard to land ownerships and the existing highway layout.
105	Land off Pwll Du Lane, Bishopston, Swansea	Residential	Fail. Fundamentally, does not meet the minimum required site size threshold for residential sites specified in the Guidance. The proposal is for an individual dwelling. It will be considered as part of the forthcoming settlement boundary review
178	Land at Upper Bank (Part 2), Nantong Way, Landore, Swansea	Residential	Fail. Fundamental constraint with regard to the existence of a Site of Special Scientific Interest (SSSI) within the additional site area that differentiates this site from CS177. SSSIs are protected from development by national planning policy
150	Land to the West of Tirmynydd Road, Three Crosses, Swansea	Residential	Fail. Fundamentally the scale of development proposed does not accord with national planning policy regarding the site's location within the Gower Area of Outstanding Natural Landscape. Also insufficient evidence submitted to demonstrate deliverability
208	Cefn Draw Farm, Three Crosses, Swansea	Mixed	Fail. Fundamentally fails to meet national planning policy requirements with regard to development in the countryside. Also insufficient evidence submitted to demonstrate deliverability.
181	Land to the Rear of 24 Cae Mansel Road, Gowerton, Swansea	Mixed	Fail. Residential element fundamentally does not meet the minimum required site size threshold for residential use specified in the Guidance. The renewable energy proposal will be considered as part of the RE assessment for the Plan
148	Ffynon Fedw Farm, Felindre, Swansea	Mixed	Fail. Fundamentally fails to meet national planning policy requirements with regard to development in the countryside.
93	Land Adjacent to Sunnyside Bungalow, Heol Las, Birchgrove, Swansea	Residential	Fail. Fundamental conflict with national planning policy with regard to significant constraints that would affect delivery of the site

<sup>87</sup> [www.swansea.gov.uk/ldp2candidatesites](http://www.swansea.gov.uk/ldp2candidatesites)

149	Land Adjacent to Waun Road, Loughor, Swansea	residential	Fail. Fundamentally fails to meet national planning policy requirements with regard to development in the countryside. Fundamentally fails to meet national planning policy
162	Land Adjacent to Hospital Road, Gorseinon, Swansea	mixed	Fail. Fundamental conflict with national planning policy with regard to significant constraints that would affect delivery of the site and no evidence submitted to demonstrate mitigation
168	Land South of Swansea Road, Garden Village, Swansea	residential	Fail. Fundamental conflict with national planning policy with regard to significant constraints that would affect delivery of the site and no evidence submitted to demonstrate mitigation.
103	Land to the South of Higher Lane, Langland, Swansea	residential	Fail. The proposal is for settlement boundary review. It will be considered as part of the forthcoming settlement boundary review
163	Mynydd Cadle Common, Penlan, Swansea	residential	Fail. Fundamental conflict with national planning policy with regard to significant constraints that would affect delivery of the site and no evidence submitted to demonstrate mitigation.
165	Land North of A484, Gorseinon, Swansea	residential	Fail. Fundamental conflict with national planning policy with regard to significant constraints that would affect delivery of the site and no evidence submitted to demonstrate mitigation.
154	Land on the North Side of Pennard Road, Kittle, Swansea	residential	Fail. Fundamentally fails to meet national planning policy requirements with regard to development in the countryside.
205	The Garden House, Mulberry Hill, Penmaen, Swansea	residential	Fail. Fundamentally fails to meet national planning policy requirements with regard to development in the countryside
142	Plot D5b, Langdon Road, SA1 Waterfront, Swansea	residential	Fail. This site is now a commitment. Planning application 2022/1109/RES was approved on 11th July 2024
209	Plots E7 and E8, Land off Langdon Road, SA1 Waterfront, Swansea	residential	Fail. This site is now a commitment. Planning application 2022/1134/RES was approved on 14th February 2024

## 10.0 OTHER RELEVANT ASSESSMENTS

### 10.1 EQUALITIES IMPACT ASSESSMENT

10.1.1 Integrated impact assessments (IIAs) are a legal requirement within both the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being and Future Generations Act 2015 Welsh Language (Wales) Measure. An IIA screening report has been undertaken using the Council's IIA template, which also takes into account other key issues

and priorities, such as poverty and social exclusion, community cohesion, carers and the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language. The IIA screening report accompanies the Report to Council, but is summarised below.

10.1.2 Table 18 indicates that the Preferred Strategy is considered to have positive impacts on the following people/communities:

- All age groups
- Future generations
- Poverty and social exclusion
- Community cohesion.
- Gypsies and travellers

**Table 18: Integrated Impact Assessment**

The potential impact on the following: the impacts below could be positive (+) or negative (-)							
	High Impact		Medium Impact		Low Impact	Needs further Investigation	No Impact
Children/young people (0-18)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Future Generations (yet to be born)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gypsies & travellers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Human Rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10.1.3 All people residing and visiting the County will be impacted by the Preferred Strategy’s ‘Placemaking Strategy for Abertawe 2038’, which sets out the scale of growth for housing and employment that will be delivered over the plan period 2023-2038 to meet identified needs and sets out spatially how this growth will be accommodated reflecting the plan’s settlement hierarchy and their role and function and contains strategic policies which will provide a specific policy framework against which planning applications will be considered (when adopted as LDP2).

10.1.4 The Preferred Strategy seeks to ensure the wider determinants of health and wellbeing are considered and health and wellbeing is embedded throughout the plan, as is consideration of climate and nature resilience due to climate change. Strategic policies specifically address pollution, flood risk, the enhancement of Green Infrastructure and active lifestyles, including

community food growing. Poverty and social exclusion are specifically addressed via the growth option of high employment, additional homes, particularly affordable housing, protection and enhancement of community and social facilities, the regeneration of areas and education facilities.

- 10.1.5 The Preferred Strategy (and subsequent Deposit LDP2) has specific policies which address the accommodation needs of Gypsies and Travellers, informed by assessments.
- 10.1.6 The timeframe of LDP2 (2023-2038) means that policies contained therein will impact upon future generations, as will the legacy of the Preferred Strategy, for example in terms of provision of housing and employment.
- 10.1.7 The Preferred Strategy is considered to have medium impacts on the Welsh language. The Strategy has been subject to a Welsh Language Impact Assessment as part of the ISA. The Strategy contains a specific Strategic Policy on the Welsh language. The Strategy itself, however cannot have a direct impact on the language and that is why it is considered to have medium impacts, as it facilitates development which may impact on the language (such as Welsh medium education or additional housing in a primarily Welsh speaking community). Similarly the impact on disabilities will be indirect, with Placemaking principles underlying the design and layout of developments to enable legible areas, ease of movement and access.
- 10.1.8 The planning system is compatible with the Human Rights Act 1998. Potential impacts of severe pollution, for example, because of development, may be in breach of Articles 8 and 1 of Protocol 1. However, avoidance and mitigation during the planning process would prevent such occurrences so the impact is considered low.

#### **WFG considerations**

- 10.1.9 The Well-being of Future Generations (WCFG) (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. LDP2 must ensure it contributes to achieving the economic, social, environmental and cultural well-being goals of Wales, as required by the WCFG Act.
- 10.1.10 The Preferred Strategy's Placemaking Strategy for Swansea outlines how LDP2 will ensure that future development across the County is brought forward in a manner that is consistent with the principles of the Placemaking Wales Charter and the duties of the Well-being and Future Generations Act, aligning with the sustainable development requirements defined in national planning policy.
- 10.1.11 The components of the Preferred Strategy have been assessed against the goals of the WCFG Act. Furthermore, the ISA ensures that the goals of the WCFG Act are embedded throughout the Preferred Strategy. The Preferred Strategy fully aligns with the Well-being of Future Generations (Wales) Act 2015.

## Cumulative impact

10.1.12 Cumulative impact with other Council plans and strategies will be positive, as the Preferred Strategy and (and Deposit LDP2) ensures their integration and compatibility with LDP2 being a means to deliver the outcomes of many Council priorities.

10.1.13 The Preferred Strategy is subject to ISA which assesses its cumulative impact with other plans, policies and programmes.

## 10.2 WELSH LANGUAGE IMPACT ASSESSMENT

10.2.1 A Welsh language impact assessment (WLIA) was undertaken on the Preferred Strategy and is presented in the Appendices to the full ISA Report. A summary is provided below.

10.2.2 The LDP2 Vision specifically refers to Abertawe 2038. With respect to consideration of the Welsh language, many of the LDP2 objectives are not directly relevant to the Welsh language and similarly many of the ISA objectives were not directly relevant to the specific LDP2 objective of increasing the number of Welsh speakers within the County. LDP2 has three objectives which relate directly to the Welsh language which unsurprisingly result in potential likely positive effects against ISA objectives relating to culture and the Welsh language:

- *Objective 15: Conserve and enhance the cultural and Historic Environment;*
- *Objective 16: Promote and safeguard the Welsh language; and*
- *Objective 17: Promote well-being and equality.*

10.2.3 LDP2 objectives 1, 2, 4 and 11 have both potential positive and negative likely effects on the Welsh language, as development will offer opportunities for affordable housing to enable people to stay within communities, and the provision of new social schools, community facilities and infrastructure. However too much development may result in existing communities being overwhelmed with a potential negative effect on the Welsh language. Policy SP8 and subsequent site allocations will have to be carefully assessed as the plan progresses in this regard.

10.2.4 It is also for this reason that the chosen Preferred Strategy '**Placemaking Strategy for Abertawe 2038**' will have potential likely positive and negative impacts on the language. Evidence shows there has been a growth in the number of Welsh speakers in the County in the 16-44 age group, between the 2011 and 2021 Census'. The Preferred Strategy, as explained in sections 5 and 6, seeks to retain younger age cohorts by offering increased job opportunities within the County, which would have potentially likely positive effects on the use and role of the Welsh language as part of the social fabric of communities.

10.2.5 LDP2 Strategic Policies include a specific policy in relation to the Welsh language – SP 7: Safeguarding and Promoting the Welsh Language. This, requires development proposals to safeguard and promote the Welsh language and culture across the County, and not permit development proposals which have a detrimental impact on the vibrancy of Welsh language and culture. Policy SP19: Historic and Cultural Assets was amended to include specific reference to safeguarding and promoting the Welsh language. As outlined above, at this stage, without knowing the location of development sites the effects of the policies on the

Welsh language are difficult to predict, with likely both positive and negative impacts. Job creation and affordable homes will help retain younger age groups which experienced a growth in Welsh speakers. The provision of affordable housing is positive, and may well help mitigate negative effects, as explained within TAN20: Planning and the Welsh language, but consideration will be needed in regards concerns that large development may have negative effects on the language if there is no mitigation e.g. phasing, planning condition(s).

10.2.6 The WLIA noted that LDP2 objectives 15, 16 and 17 together with Strategic Policy 7: Safeguarding and Promoting the Welsh language and Strategic Policy SP19: Historic and Cultural Assets will help to support and enhance the Welsh language. It is not anticipated that the Preferred Strategy is likely to have an adverse effect on the language at this stage of Plan development. However, as the Plan progresses and more detailed policies are formed, the impact of planning decisions on certain characteristics will need to be assessed and mitigated against where appropriate. It is possible that reference and awareness to the Welsh language could be strengthened throughout the document, as the Vision refers to Abertawe 2038, but this is not continued through the policies.

10.2.7 Consultation documents on the Preferred Strategy will be available in Welsh.

### **10.3 HEALTH IMPACT ASSESSMENT AND THE ISA**

10.3.1 The SEA Regs (Sch 2.6) requires human health to be considered as part of the assessment of environmental effects and included within Environmental Reports. The best known definition of the social model of health is one that was produced by the World Health Organisation (WHO) in 1948 which stated that:

*'Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. (WHO, 1948)*

10.3.2 The health component of an SEA can be broadened to include both physical and mental health objectives of a Health Impact Assessment (HIA) and using the HIA process within an ISA and/or as a standalone process is promoted by WG. Human health should therefore be considered in the context of the interrelationship between all SEA factors stated in Schedule 2.6 and thus, indirect issues that arise from the implementation of policies must also consider environmentally related health issues such as exposure to traffic noise, air pollutants, and water contamination.

10.3.3 The Public Health (Wales) Act 2017<sup>88</sup> outlines the circumstances in which a Public Body must carry out a Health Impact Assessment (HIA). The Act defines a HIA as:

*"an assessment of the likely effect, both in the short term and in the long term, of a proposed action or decision on the physical and mental health of the people of Wales or of some of the people of Wales".*

10.3.4 Planning Policy Wales (PPW) highlights the role of HIAs in contributing towards development plan making, stating that *'Evidence on health impacts can help the planning system develop stronger and more coherent approaches towards maximising health and*

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<sup>88</sup> [Public Health \(Wales\) Act 2017 \(legislation.gov.uk\)](https://legislation.gov.uk)



*well-being.*” HIA is a key tool through which to raise awareness of the effect that traditionally described ‘non-health’ sectors (such as planning and housing) have on health and well-being and how they can support health improvement, prevention and protection. It is a systematic, objective, flexible and practical way of assessing both the potential positive and negative impacts of a proposal on health and well-being and suggests ways in which opportunities for health gain can be maximized and risks to health minimised. HIA can also provide a way of identifying and addressing the inequalities in health by identifying any groups within the population who may be particularly affected by a policy or plan. For example, the built environment, through access to physical activity/active travel/nature/shops selling healthy foods, could have a protective role in reducing prevalence of long-term conditions in the population and details in relation to the disease burden across the population and future trends (such as diabetes, obesity or dementia).

10.3.5 By undertaking a HIA, LDP2 will embed health throughout the plan, resulting in Health in All Policies (HiAP). HiAP is defined as:

*“An approach to public policies that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts, in order to improve population health and health equity”*

(8th Global Conference on Health Promotion, Helsinki, 2013) (WHO, 2013)<sup>89</sup>

10.3.6 The Welsh Health Impact Assessment Unit (WHIASU) provides support for health impact assessments across Wales. Following the methodology in the ‘HIA and LDPs: a Toolkit for Practice’ (WHIASU, 2021)<sup>90</sup>, Swansea Bay University Health Board and Public Health Wales were consulted as stakeholders during the preparation of the Preferred Strategy and a ‘**Rapid Participatory HIA**’ of the Preferred Strategy as part of the wider public and stakeholder consultation will be undertaken. Any comments and recommendations will be considered and incorporated into the Deposit LDP2. A further HIA of Deposit LDP2 will be undertaken in order to embed the concept of ‘Health in All Policies’ (HiAP).

## 11.0 NEXT STEPS

### Consultation

11.0.1 Comments are invited on the Preferred Strategy and associated documents, including this ISA Report Non-Technical Summary.

### Deposit Plan

11.0.2 Any comments received will be reviewed and then considered as part of the iterative plan-making and ISA process and will inform development of the Deposit LDP2 which will include updated Strategic Policies, detailed policies and allocated development sites. The Deposit LDP2 will be accompanied by an updated ISA Report which appraises all the policies including their cumulative impacts, suggests mitigation measures, and proposes a framework for monitoring the impacts of the plan. The Deposit LDP2, ISA Report and other documentation (e.g. Habitats Regulations Assessment) will be examined by a Planning

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<sup>89</sup> [https://www.who.int/healthpromotion/conferences/8gchp/8gchp\\_helsinki\\_statement.pdf](https://www.who.int/healthpromotion/conferences/8gchp/8gchp_helsinki_statement.pdf)

<sup>90</sup> [HIA-and-LDPs-Toolkit-E-final.pdf \(phwhoccc.co.uk\)](https://www.phwhoccc.co.uk/HIA-and-LDPs-Toolkit-E-final.pdf)

Inspector as part of an Examination in Public and the Plan and ISA Report may require further changes post-examination.

### **Adoption and Monitoring**

11.0.3 In order to comply with SEA Regulation 16, once the LDP2 is adopted the Council will publish a 'SEA statement' which explains how the iterative sustainability appraisal influenced the development of the Plan.

11.0.4 SEA Regulation 17 requires local authorities to monitor the implementation of LDP2 to ensure that if any unforeseen adverse effects occur appropriate action can be taken. Monitoring measures will be established within the Deposit Plan ISA Report.