



# CDLI Abertawe Swansea LDP 2023-2038



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# Starting the Conversation on LDP2

Engagement Report  
December 2024

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# 1.0 Introduction

## Overview

**1.1** We (the Council) have recently commenced work on the [Swansea Local Development Plan \(LDP\) 2023-2038](#). This is an exciting opportunity for Swansea to produce a new blueprint to guide development and form the basis for how planning decisions will be made in Swansea over the next decade and beyond. Swansea continues to witness transformative change to many parts of our County, and there remains huge ambition to continue to secure positive, sustainable forms of development that will benefit Swansea's residents and visitors to our area.

**1.2** The role of the LDP is to make sure that the right development happens, in the right areas, for the right reasons. It is therefore vital that the early stages of plan preparation identify the right priorities for our area, and that these are formulated in collaboration with our partners and stakeholders.

**1.3** The new Plan will replace the [existing Swansea Local Development Plan 2010-2025](#) and for this reason is referred to as 'LDP2'.

**1.4** LDP2 will be prepared in line with the Council's approved Delivery Agreement, which has been agreed with the Welsh Government. Importantly, **the Delivery Agreement sets out the approach to stakeholder engagement and community consultation that we will follow during the formation of LDP2**. It emphasises that feedback gained throughout the process will help shape all stages of the Plan.

# Purpose of this Report

**1.5** Reflecting the commitments made within the Delivery Agreement and our proactive approach to engagement, we initiated a wide-ranging public consultation as part of the Pre-Deposit stages of LDP2 from April to June 2024. This process resulted in a significant number of comments being submitted to us from a range of interested parties/individuals.

**1.6** This Report captures some of the ‘main messages’ and feedback captured from the consultation, focusing on the proposed Key Issues, Vision and Objectives (KiVO) and Growth and Spatial Approaches (GSA), which together set the strategic agenda for LDP2.

**1.7** The feedback and comments received will inform the content of the LDP2 Preferred Strategy, and its associated evidence base. When published, these will also be subject to a formal (statutory) and wide-ranging consultation to inform the next stages of the Plan.

**1.8** Whilst we have considered every comment we received, this Report does not set out and respond to each comment on an individual basis. This reflects the informal nature of the conversations undertaken. The purpose of this initial consultation was to allow us to consider whether we are on broadly on the right track and identifying specific amendments as appropriate.

**1.9** Further to the above, **it is important to note that this Report is not a formal/statutory consultation report.** Such a report will be produced at the appropriate stage(s) of Plan preparation as required by regulation. In this regard, all duly made representations we receive in future statutory consultations (including the consultation on the Preferred Strategy) will be formally acknowledged, captured and responded to as appropriate.

# 2.0 Conversations held on LDP2 to date

## ‘Starting the conversation on LDP2’

2.1 We ‘started the conversation’ on LDP2 by engaging with key stakeholders (see section on ‘Wider Conversations’ below) and undertaking a full public consultation on the draft key issues, vision, objectives, and options for growth. This consultation ran from 18 April to 14 June 2024.

2.2 We wanted to initiate conversations and stimulate debate and inputs from interested parties, to ultimately inform decisions about the most appropriate overall strategic approach for LDP2.

2.3 As part of this consultation, we produced a 'Starting The Conversation' consultation document (April 2024), held 2 face to face ‘drop in’ events at the Library in Swansea Civic Centre and utilised an innovative virtual consultation room. We also targeted the extensive LDP2 consultee database to raise awareness of all the material and information available for review.



Figure 1: Engagement approaches

2.4 Two key technical papers were also published as part of the consultation on 17 May 2024:

- **‘Starting the Conversation on LDP2’ – Key Issues, Vision and Objectives (May 2024):** The purpose of this Paper was to inform the process of engagement with the public and stakeholders regarding our initial ideas and proposals for LDP2. Specifically, the aim was to build a consensus around what are the key issues of relevance to Swansea and what should be the objectives and overarching Vision to guide the strategic direction for the plan.
- **‘Starting the Conversation’ on LDP2 - Growth Scenarios and Spatial Approaches’ (May 2024):** The purpose of this Paper was to inform the process of engagement regarding our initial ideas and proposals for LDP2, particularly on ‘strategic options’ for growth. Specifically, the aim was to build a consensus around the most appropriate level of growth that LDP2 should plan for, and the best approach to be taken in terms of the spatial distribution of that future growth.



Figure 2: Technical Papers (May 2024)

**2.5** A high response rate was received in respect of the consultation held, demonstrating the effectiveness and inclusiveness of the engagement approaches. Responses were received from individuals, along with a number of organisations such as the Coal Authority, Minerals Products Association, Natural Resources Wales and the Home Builders Federation. Whilst comments of a site specific nature were received, these were simply noted and will need to be re-submitted at the appropriate time.

## **Wider conversations held**

**2.6** Whilst this Report focuses on the outcomes of the consultation held on the KiVO and GSA, it should be noted that consultation and engagement has taken place with a wide range of stakeholders, including with the Council's Elected Members who represent constituents from across Swansea.

**2.7** Consultation with specific and general consultation bodies has been (and continues to be) undertaken, including with the Welsh Government, Natural Resources Wales, Dwr Cymru Welsh Water and Swansea Bay University Health Board. We also hold regional discussions with other Authorities within South West Wales.

**2.8** During 2023, we sought comments on the Review Report, Draft Integrated Sustainability Appraisal (ISA) Scoping Report and invited candidate site submissions.

**2.9** Appendix 3 of this Report sets out the LDP2 engagement diary which identifies the dates of a wide range of events and meetings held.



# 3.0 Feedback on Key Issues, Vision and Objectives

## Introductory Overview

**3.1** A key starting point for LDP2 is to try and build consensus on the key strategic issues that the plan should seek to address. These may be challenges confronting Swansea which LDP2 could contribute to addressing, or perhaps opportunities that the plan should capitalise on to deliver positive impacts. Bringing the issues together we need to think about what our ultimate aspiration is for how we want Swansea to look in 2038. To help deliver the vision, we need to set the main objectives covering the economic, social, environmental and cultural issues. Read together with the vision, these objectives should set a clear context from which the strategy for LDP2 will be formulated.

**3.2** The primary purpose of the consultation was to assist in the identification of key areas for us to focus on in preparing the KiVO as presented in the Preferred Strategy. The 'main messages' captured have directly informed our thinking in this regard. The publication of the Preferred Strategy represents the 'formal/statutory' consultation on the KiVO.

**3.3** The Integrated Sustainability Appraisal (ISA) reviews the impact of the Plan in respect of the sustainability objective framework. With regards appendix 4 of the KiVO Technical Paper as published in May 2024 (the ISA framework 2024) iterative updates may have been made to the listed ISA objectives as appropriate. However, any such changes are not captured in this report. The ISA itself (and any ongoing updates thereto) sets out the evolving ISA objectives as the Plan making process proceeds.

**3.4** In order to inform the Preferred Strategy and its associated evidence base, the ‘main messages’; arising from the consultation follow below.

## Comments received on Key Issues

**3.5** From the responses received, it is considered that the scope of issues as set out in the consultation documentation provides a suitable basis for the identification of the issues within the Preferred Strategy, with a number of supporting comments received in this regard.

**3.6** Amongst those comments made in respect of the key issues were those from the [‘Swansea Project’](#). It was stated that the key issues align well with opportunities for the redevelopment of the docks area, bridging the current gap between SA1 and the outlying Swansea University Bay Campus via the creation of an Innovation Corridor. The response stated that the development of a significant renewable energy project alongside state-of-the-art battery manufacturing facilities and datacentres will not only encourage business growth, but also enable the University to attract world leading talent into the area, in turn creating a scientific and research hub that will create new business opportunities and increase employment opportunities.

**3.7** The responses received (including any relevant recommendations emerging from the iterative ISA process) did however indicate that there will be a need to recognise the following matters (and amend the draft key issues) as part of the preparation of the Preferred Strategy:

- Refer to sustainable planning of the coastal and marine environments;
- Emphasise the precautionary approach to flood risk and reference erosion, and
- Refer to the importance of tackling crime.

**3.8** Comments were also received emphasising the importance of healthy eating, free public transport for under 18's, lowering parking charges and banning fly advertising. It was not considered that such matters necessitated a change in approach in respect of the key issues identified, given that not they are not directly relevant in terms of land use planning.

**3.9** Many of the comments received were helpful in terms of identifying where there is a need to elaborate upon and/or clarify the commentary and sources/context material which was set out within the KiVO Technical Paper (May 2024). This includes referencing the following matters/strategies:

- The Sustainable Management of Natural Resources;
- The State of Natural Resources Report;
- The South West Wales Area Statement;
- The Wales National Marine Plan;
- The Wales Marine Area Statement;
- The Population Health Strategy – Swansea Bay, and
- The Shoreline Management Plan.

## Comments received on Vision

**3.10** From the responses received, it is considered that the direction of travel as set out in the consultation documentation provides a suitable basis for the identification of the Vision within the Preferred Strategy, with a number of supporting comments received in this regard.

**3.11** Furthermore, a comment stated that the Vision “sets out a clear, and obtainable, vision that can address the challenges that are facing the City and County over the new Plan period.” Also, it was stated that the emphasis on a range

of housing in the Vision is of great significance given the challenges of the cost of living crisis and current housing demands.

**3.12** The responses received (including any relevant recommendations emerging from the iterative ISA process) did however indicate that there will be a need to recognise the following matters (and amend the draft Vision) as part of the preparation of the Preferred Strategy:

- Climate resilience and sustainability needs;
- Swansea Bay and Llanelli National Growth Area;
- Need for sustainable growth;
- Culture and Heritage;
- Community safety, and
- Resilient ecosystems.

## Comments received on Objectives

**3.13** From the responses received, it is considered that the scope of objectives as set out in the consultation documentation provides a suitable basis for the identification of the Objectives within the Preferred Strategy, with a number of supporting comments received in this regard.

**3.14** Of particular note is the supporting received in regards the references within the objectives to the integration of the climate and nature emergencies and the recognition that these emergencies are interlinked.

**3.15** The responses received (including any relevant recommendations emerging from the iterative ISA process) did however indicate that there will be a need to recognise the matters set out in Table 1 below (and amend the objectives and/or supporting commentary as appropriate) as part of the preparation of the Preferred Strategy:

**Table 1: Changes required on the Draft Objectives**

<b>Draft Objective</b>	<b>Changes required as a result of consultation responses</b>
<b>Strong Communities</b>	
1	There is a need to reflect Swansea’s role and status at the heart of the Swansea Bay and Llanelli National Growth Area. The natural and built heritage should be cited, whilst there is a need to acknowledge that economic opportunities are directly linked to the qualities of ecosystem services that Swansea’s natural environment provides, both in the urban and rural areas.
2	In recognising the importance of vitality and vibrancy, there is a need to maintain the right mix of land uses within centres to support their unique and varied role, function and character. There is a need to acknowledge that there are opportunities to deliver a strategic approach to green infrastructure to address climate change issues or urban heat islands, increasing sustainable urban drainage networks and reducing diffuse urban pollution. The importance of safe and welcoming hubs should be noted also.
3	There is a need to recognise a range of economic activity.
4	The relationship between resilient natural resources, health and wellbeing and the visitor economy should be noted.
<b>Climate Change and Nature Recovery</b>	
5	The issue of erosion (including within flood risk considerations) within a development planning context requires recognising. Furthermore, there is a need to recognise that nature-based solutions are part of the actions for climate resilience.
6	There is a need to refer to restoring resilient ecological networks. Furthermore, there is a need to acknowledge the importance of moving towards a nature positive position and that the outstanding natural environment, including diverse landscapes, need protecting. The contribution that the objective will make to building and sustaining healthy communities should be noted. It would be helpful to clarify that multi-functional green infrastructure incorporates nature-based solutions including: accessible green spaces, tree planting and Sustainable Drainage Systems, all as part of an integrated placemaking based approach.
7	There is a need to refer to low carbon and renewable technologies. The State of Natural Resources Report (SoNaRR) for Wales 2020 theme ‘Transforming the energy system’ should be noted. It should be identified that the objective supports appropriate stand-alone energy and infrastructure proposals as well as those integrated into wider schemes.
8	No response required to any comments received on objective.
9	Reference to waste infrastructure is required.
10	Reference is required to minerals infrastructure and ensuring the steady adequate supply of minerals is maintained. It should be clarified that the reference to sustainable use in the objective would include promoting the use of secondary aggregates.

<b>Live well, age well</b>	
11	Reference is required to housing need. The contribution to mitigation and adaption to climate change through design and location requires recognition, whilst it would be helpful to signpost to objective 7 (low carbon).
12	No response required to any comments received on objective.
13	The State of Natural Resources Report (SoNaRR) for Wales 2020 theme 'Transforming the transport system' requires recognition.
14	The need to consider environmental capacity requires recognition. It should be noted that Objective 6 is proposed to contain clarification on multi-functional green infrastructure incorporating nature-based solutions.
15	The historic landscape requires recognition.
16	No response required to any comments received on objective.
<b>Early years</b>	
17	Reference is required to high standards of environmental quality. There is a need to recognise environmental benefits as well as enhanced biodiversity and that due regard will be required to matters of noise, light, odour and water quality.
18	There is a need to recognise green infrastructure whilst The State of Natural Resources Report (SoNaRR) for Wales 2020 theme 'Transforming the food system' requires noting.

**3.16** Comments were received on a number of detailed facets, including energy efficient design and safety of pedestrians. It is not considered that such matters necessitate a change in approach in respect of the objectives identified, given that the objectives are high level statements of intent and matters of detail (e.g. site design) can be considered through the detailed policy framework of the Plan.

# 4.0 Feedback on Growth and Spatial Approaches

## Introductory Overview

**4.1** One of the most important decisions to make at the outset of LDP2 is to resolve what is the most appropriate scale of growth to plan for in Swansea alongside decisions on how that growth should be accommodated spatially (i.e. where should this growth be located). We have been undertaking a comprehensive review of the evidence on potential levels of population growth and anticipated needs for new homes and jobs over the period to 2038. This work has produced scenarios for numbers of new homes and jobs that the new plan needs to provide for, which in turn will influence the amount of land that will need to be available for residential and business development.

**4.2** The primary purpose of the consultation was to assist in the identification of key areas for us to focus on in preparing the GSA as presented in the Preferred Strategy, along with the production of the 'Options for Growth and Spatial Approaches' Paper (December 2024). It should be noted that the publication of the Preferred Strategy represents the 'formal/statutory' consultation stage in this regard. The ISA reviews the impact of the Plan in respect of the sustainability objective framework.

**4.3** In order to inform the Preferred Strategy and its associated evidence base, the 'main messages'; arising from the consultation follow below.

# Comments received on Strategic Context

**4.4** A number of comments were received in respect of the introductory section of the GSA Technical Paper (May 2024), with particular reference to the Role and Function analysis. There will be opportunities to respond to the comments as part of the preparation of the Preferred Strategy, and its associated evidence base, as appropriate. In summary, some of the ‘main messages’ to emerge include the following:

- In general, positive feedback as to the opportunity to comment on LDP2 at an early stage – noting the ‘non-statutory’ nature of the consultation;
- A specific narrative/profile of place-based challenges and opportunities presented by climate and nature emergencies would be helpful;
- Ongoing collaboration and engagement encouraged with stakeholders, recognising the ‘five ways of working’;
- Support for aligning the conversations and strategic context within the framework of the Swansea PSB Well-being Plan 2023-2028;
- National Growth Area Future Wales (2040) emphasised within the strategic context;
- As part of the discussion on role and function, future settlement assessment work should capture: Climate and nature resilience, GI and ecosystem resilience; place specific environmental hazards and landscape impact. The place-based implications of climate and nature emergencies upon housing growth options needs to be clear.



# Comments received on Strategic Policy Components

**4.5** A number of comments were received in respect of the policy areas presented for discussion. In summary, some of the ‘main messages’ to emerge by topic are set out in Table 2 below:

**Table 2:** Comments received on strategic policy components

Topic	Summary of comments received
Transformational Change	The Plan should clearly communicate a vision for innovation in relation to becoming a green and sustainable city.
Sustainable Economic and Employment Activity	The reference to net zero targets and the climate emergency was welcomed. There is a need to consider employment arising from ‘green economy’ and the increase in demand for environmental/green skills.
Responding to the Nature Emergency	The cross-cutting importance of green infrastructure (GI) was emphasised - including the central area. It was stated that there is a need to develop a recognition of scale when it comes to GI. Consideration of green wedges is required.
Sustainable Development	Water and Opportunity Catchment Areas need considering. Clarity is required on the effect of climate change on the long term economic and social trends that the growth strategy will need to consider. The Plan should also recognise issues arising from predicted changes in temperature and potential responses, such as, green infrastructure solutions to reduce urban heat islands, energy efficient construction for hotter summers, colder winters etc. There is a need to communicate more clearly the concept of nature providing ecosystem services that support sustainable development. The references to nature should be more than in terms of constraints.
Mineral Resources	Significant coal mining legacy present in Swansea and land stability matters raised. Importance of Minerals as a strategic issue emphasised and that national policy is reflected. Also matters of apportionment and the Statement of Sub-regional collaboration need to be considered as part of preparation of LDP2. The Regional Technical Statement is a key strategic cross cutting issue across a number of topic areas. Wider uses of minerals needs to be referenced in the ISA.
Delivering New Homes	The housing needs of elderly population needs acknowledging. Community led housing has a role to play.

Placemaking	The accessibility of buildings and Welsh Development Quality Requirements 2021 was emphasised. The role of nature and landscape in placemaking could be made more explicit. Placemaking requirements are clearly set out in both Future Wales and PPW12 and the Welsh Government Development Plan Manual does say that LDP's should not repeat national policy.
Active Travel and Sustainable Integrated Transport	The consideration of Network Rail assets is important. Active Travel and sustainable transport offer GI opportunities which should be considered as part of LDP2.
Infrastructural Capacity	A 'thinking beyond traditional grey infrastructure' approach was supported.
The Welsh language	The importance of the Welsh language was noted.
Well-being and Equality	Health and wellbeing perspectives important, noting health impact assessment requirements.
Community Facilities	Reference to multi-functional open spaces – including reference to growing spaces - supported. The LDP should reflect the Council's declaration of the climate emergency as it applies to the local food system, and to enhancing biodiversity.

## Comments received on Housing and Employment Growth

**4.6** We felt it was very important to initiate early conversations on the number of homes and additional employment it may be necessary to provide for between 2023-2038. To facilitate these conversations, we presented scenarios as per Table 3 below. All of the housing growth scenarios presented are significantly lower than the identified growth requirements in the current LDP (15,600). It is helpful when reading this analysis to refer to the Local Development Plan - Review report (July 2023).

**Table 3: The Growth Scenarios (as presented in May 2024)**

Scenarios based on...	Homes per year	Homes 2023-38	Employment 2023-38
1. Baseline economic forecast	514	7,710	7,575
2. Long-term population growth trend	562	8,430	7,785
3. WG population projection	634	9,510	8,115
4. Higher economic growth	634	9,510	9,855
<b>Comparisons...</b>			
Recent housing delivery (2010-23)	485	7,275	5,205
Adopted LDP requirement	1,040	15,600	13,600

**4.7** A number of comments were received in respect of the scenarios presented. This included responses from a number of organisations such as the Home Builders Federation, together with a range of developers/agents. These comments will inform the preparation of the Preferred Strategy. Furthermore, reference should be made to the following Papers: ‘Options for Growth and Spatial Approaches’ (December 2024) and ‘Analysis of Housing Supply’ (December 2024). It is also noted that at the time the conversations held in May 2024, the ‘Economic and Housing Growth Assessment’ (July 2024) had not been published. The publication of the ‘Economic and Housing Growth Assessment’ is a key evidential component which will support the upcoming consultation on the Preferred Strategy. Due regard should be given to the ISA process. Reference should be made to the summary of responses as set out in Appendix 1 (table 4) of this Paper. Some of the ‘main messages’ to emerge included:

- Are growth levels are too low? There is a need to increase the flexibility allowance (currently 10%). General concern as to lack of ambition.
- It is important that there are opportunities for a range and mix of site sizes. Strategic sites take time to go through the system, and there needs to be an offer for SMEs.

- NGA / Future Wales designation is acknowledged in policy context/issues, but does this translate to the scenarios/figures being presented.
- Regional matters, regional apportionment considerations important. Growth scenario 3 would be consistent with Future Wales.
- Homes for an increasing elderly population emphasised.
- Support for the approach of discounting landbank sites and future windfall delivery. Use of a percentage discount as good starting point, however more detailed analysis should be undertaken particular on sites which have been rolled over from previous earlier plans.
- Have the forthcoming economic shocks associated with the changing operations for TATA at Port Talbot have to an extent been considered as part of one of the scenarios ('economic growth policy-based scenario')?
- Is there an understanding of implications of Empty Homes ?
- Further housing growth options should be tested based on higher overall levels of job growth, taking into account past trends, key sector priorities and the aspirations of the City Deal.
- Need to clarify linkages between housing and employment growth.

## Comments received on Spatial Approaches

**4.8** Alongside making decisions around the scale of future growth in Swansea, there are a range of approaches that could be taken in respect of where new development should be focused to deliver that growth. To facilitate these conversations, we presented 5 spatial approaches which were: Urban / Brownfield Focus, Strategic Placemaking Focus, Dispersal Focus, Highly Connected Communities and Housing Need Clustering Focus. It will be helpful when reading this analysis to refer to the Local Development Plan - Review Report (July 2023).

**4.9** A number of comments were received in respect of the spatial approaches presented. This included responses from a range of developers/agents. These comments will inform the preparation of the Preferred Strategy. Furthermore, reference should be made to the Paper on ‘Options for Growth and Spatial Approaches’ (December 2024). A summary of the responses received are set out in Table 5 (Appendix 2 of this Paper). Reference is also made to the emerging evidence base in terms of the ‘Initial Green Infrastructure Assessment’ (December 2024)

**4.10** It would not appear that there was conclusive support for 1 spatial approach in isolation. The comments received recognised there are different opportunities and challenges by each of the approaches and there is a balance to be struck between maximising the opportunities available.

**4.11** It was stressed that the effects on biodiversity are limited and not consistently considered across the approaches. Also, the GI consideration could also go further and include an appraisal of climate and nature resilience. For example, how do the options differ in relation to exposure to flood risk and environmental hazards, use of/impact on natural resources, meeting net zero targets? By way of response, we accept the importance of these matters and will seek to respond as appropriate in the options assessment work, notably within the Paper on ‘Options for Growth and Spatial Approaches’ (December 2024).

**4.12** The main message that we need to take on board ahead of the preparation of the Preferred Strategy is that, in reality, it is probably not possible to select a single spatial approach and that a hybrid approach may be sensible to pursue. The responses we received do however place a clear emphasis on the importance of deliverability and connectivity. In this regard, a number of supporting comments were received in regards the ‘**Connected Communities**’ approach in particular, as well as the ‘**Strategic Placemaking**’ approach. Whilst the ‘dispersal’ approach did not draw notable support as a stand- alone option, the importance of a range and mix of sites (including smaller sites to augment the overall offer in conjunction with larger strategic allocations) was recognised. Factoring in ‘housing need’ and ‘brownfield/urban’ sites can also form part of an overarching approach (e.g. site selection process).

**4.13** We have utilised the comments received to inform the 'Paper on 'Options for Growth and Spatial Approaches' (December 2024). In noting the comments/ concerns received with regards the current LDP spatial option, will also review the current LDP 'business as usual' spatial option within that Paper in addition.

# 5.0 Conclusions and Next Steps

**5.1** The engagement undertaken to date has demonstrated that we are on the right track with LDP2, with only focused amendments needed to the issues vision and objectives as they will appear in the Preferred Strategy. In respect of growth and spatial approaches, we need to reflect on the feedback provided as part of the preparation of the Preferred Strategy and within the 'Options for Growth and Spatial Approaches' (December 2024) Paper.

**5.2** The next steps in the process of preparing LDP2 will be the publication of the Preferred Strategy for consultation, accompanied by its associated evidence base. Pending Council approval, this consultation will take place in early 2025.

**5.3** We appreciate the consultation input that we have received so far in preparing LDP2. However, once the Preferred Strategy is published, we will be asking for further comments – noting that the publication of the Preferred Strategy represents the first 'statutory' or 'formal' stage in Plan preparation.

**5.4** We will be producing an Easy Read version of the Preferred Strategy, together with an animation guide. We want to continue with an inclusive approach, and will ensure that we conduct our conversations and engagement in a manner which is consistent with the Community Involvement Scheme set out within our Delivery Agreement.

**5.5** Further information on LDP2 is available [on our website](#).

# Appendices

## Appendix 1: Summary of comments received on Growth Scenarios

Table 4: Summary of comments received on the growth scenarios

<b>Baseline economic forecast and Long-term population growth trend Scenarios</b>
<p>Strongly of the view that it is appropriate to discount the low growth options. They reflect under-delivery in the past and would project a lower growth scenario for the future that would undermine the strategic options for Swansea. Indeed, Policy 1 of Future Wales is clear that there will be growth in housing and employment in the main growth areas which include Swansea. By not maximising growth and adopting a level of growth that is lower than has historically been required, it will not be possible to achieve on potential.</p> <p>Concern regarding the significantly reduced provision as part LDP2. Considered that scenario 3 &amp; 4 should be the absolute minimum, however the current provision is not supported. Scenarios 1 &amp; 2 should not be taken any further forward and are to the detriment of Swansea as a whole.</p> <p>Scenarios 1 &amp; 2 simply do not reflect Swansea and its status in Future Wales. The proposed level of growth needs to be discounted at this early-stage otherwise Swansea, as a whole, will not prosper and will decline with significant long reaching social and economic impacts. Scenarios 1 and 2 propose a lower growth trajectory per year, which, considering the evidenced shortfall under the current Plan, and the proposed growth trajectories, are not considered an adequate approach to meet or fulfil demand.</p>
<b>WG population projection scenario</b>
<p>It is clear that Welsh Government expect the housing requirement for the Preferred Strategies of local planning authorities in National Growth Areas to exceed the Welsh Government 2018 Principal Projection. This is by a minimum of 20% (Newport) and in excess of 100% (Monmouthshire).</p> <p>This approach has already been endorsed by various other LPA's across Wales. Notwithstanding this, a potential combination between the two Growth options (i.e. Options 3 and 4) may be a more necessary and effective approach. Both options are, after all, equally aligned with the Plan's Objectives. The overarching requirement of the endorsed</p>



growth approach however needs to be centralised around a high growth trajectory in order for the LDP2 to effectively meet both housing and employment targets.

This Growth Scenario and Spatial Option 4, provide the best opportunity for Swansea to satisfactorily and appropriately address the key issues, challenges and opportunities that the County faces over the plan period.

This scenario is based upon the Welsh Government (WG) population projection for Swansea, which is now over four years old. This raises issues such as not accounting for the impacts from the COVID pandemic or findings from the 2021 Census and subsequent estimates of population change.

Whilst none of the scenarios provided are ideal, it is considered that scenarios 3 & 4, whilst not necessarily supported, should be seen as the absolute minimum housing provision required.

This scenario is consistent with Future Wales's Regional Housing Need – an approach which has been supported by Welsh Government in the Preferred Strategies recently prepared and consulted upon by other Authorities, such as the Vale of Glamorgan and Rhondda Cynon Taff (RCT). This scenario would ensure Swansea's alignment with the endorsed national growth approach – and its identified role in the South West Region. Uniformity at national and local level in regards housing and employment projection is considered to be a reliable approach to growth.

This scenario should be pursued as a minimum to address the key issues that the Council are facing in relation to meeting the need for new homes and jobs across the City and County .

### **Higher economic growth**

Supportive of higher growth scenarios to provide housing delivery including affordable dwellings. The employment element of the higher growth scenarios must be balanced and in doing so would seek to retain young people and limit out commuting, in the knowledge high quality employment opportunities are offered within the county together with a range of dwelling type, tenure, to seek to reduce the current trend of ageing population.

The draft jobs growth targets in the each of the LDP2 Growth Options (505-657 jobs p.a.) are low when considered against past performance and in the light of the City Deal ambitions. Even the Council's proposed "Higher economic growth" option, which would result in the creation of 657 jobs p.a., is not aspirational in this context. The last few years have seen significant job losses, however, this should not form the basis for positive planning.

No detailed information has been published on the methodology applied to calculate “positive adjustments”. Therefore, it is not possible to comment on the mechanics of this approach. However, it is suggested that further housing growth options should be tested based on higher overall levels of job growth, taking into account past trends, key sector priorities and the aspirations of the City Deal.

Whilst none of the scenarios provided are ideal, it is considered that scenarios 3 & 4, whilst not necessarily supported, should be seen as the absolute minimum housing provision required.

The adoption of a Growth Scenario that promotes a high level of housing and employment delivery is required. Accordingly, it is considered that Growth Scenario 3 or preferably Scenario 4 should be pursued as a minimum.

### **Wider Comments received on growth**

Question why only four scenarios are presented as typically at Preferred Strategy stage a broader range of Growth Scenarios would have been presented. Concern is that the selection of any of the four Growth Scenarios would fail to give due weight to Swansea’s centrality within the National Growth Area. Considered that the four growth options presented to date should be supplemented by an additional set of growth scenarios to provide a more robust position.

The housing requirement to be used for an authority, such as Swansea (within a National Growth Area) should be in excess of the principal household projection. The Preferred Strategy should be based on an alternative (and higher) growth option to the four presented.

Concern that the low level of growth presented in all growth scenarios will not allow for LDP2 to accord with the objectives set out in Future Wales for the delivery of the National Growth Area. This will potentially result in a plan which fails to meet the tests of soundness – in particular, Soundness Test 1 : in that the replacement LDP would not be consistent with other plans (i.e. Future Wales).

The housing growth scenarios are significantly lower than the identified growth requirements in the current LDP. It is appreciated that the growth scenarios are evidence-based, and that the Council has worked with analysts to produce a range of economic and population forecasts – with this analysis resulting in the housing growth scenarios which are substantially reduced in comparison to the current growth requirements for Swansea. However, the significant drop in proposed growth presents concern in relation to the ability of the plan to accord with the National Development Framework.

Whilst Swansea arguably faces greater economic challenges than Newport and Cardiff, it is considered that its growth ambitions should be closer to that in these comparator cities. The emerging housing requirement should be in excess of 800dpa – representing an uplift from delivery levels during the recession/post-recession period but at a scale that is clearly deliverable and would represent a 0.70% increase in the existing number of dwellings (still below the lowest options considered in Cardiff and Newport). However, this will need to be tested properly as part of the next stages of plan preparation. The proposed jobs targets within the Growth Options would represent an increase of between 0.42% and 0.54% p.a. compared to the existing number of jobs in Swansea in 2022. By contrast, the draft jobs targets in Cardiff and Newport Councils' Preferred Strategies each represent a significantly higher increase, of 0.88% p.a. and 0.69% respectively.

There is an urgent need to boost the supply of both market and affordable homes in Swansea in order to provide homes for people to live in and to support economic recovery, resilience and growth – which are key elements in increasing prosperity for Swansea and the wider region. The recognition of the role the private sector can play in the delivery of new affordable homes and the high demand for affordable housing. This being the case it would seem strange that the plan looks to reduce the level of private housebuilding which in turn will reduce the delivery of affordable homes.

In terms of the approach to scale and type of growth in housing and the type of development prioritised in the LDP, it is important this is aligned to identified population need - in particular the need for more affordable homes, homes that are for 1 or 2 people and homes that meet the needs of an ageing population.

The significant demand for affordable housing has come about as a result of wider and long standing economic considerations, albeit has been exacerbated and compounded by the shortfall in provision of the current Plan. Appropriate levels of growth will need to be pursued going forward to ensure that the shortfall is addressed in the new Plan.

Concern at lack of linkage between housing and employment growth.

A 20% flexibility allowance should be sought.

The proposed windfall allowance is queried given limited opportunity for speculative applications.

The document is framed within the context of Future Wales 2040 and the designation of Swansea as a National Growth Area. There is an assumption which marks the whole document that growth and development are interchangeable terms. This is a questionable assumption on a finite planet and suggests that the terms of the conversation have already been firmly established.

It is far too simple to just identify that the delivery of new homes has been less than forecast, without explaining why. This also sets a tone which suggests that we should plan for less homes, when there is clearly and existing need which has been unmet by previous under delivery and a strong future need which is linked to the economic aspirations of the area.

This lack of aspiration for growth is compounded by reference to recent population and economic forecasts which are of course based on past trends including recent years where there have been several unexpected factors. Many of these factors have resulted in slower delivery but have not removed the need.

It is considered that not only has the delivery rate of homes in Swansea been affected by national factors, the pandemic and economic market, but also by a number of local issues. The previous LDP included the allocation of several larger strategic sites, and due to a range of reasons, these have taken longer to start delivering the planned new homes. Furthermore, Swansea Council's concentration on the Placemaking agenda has added delays to the determination of planning applications leading to delaying site starts.

A number of positive issues are identified in the engagement material, including the fact that Swansea is strategically located at the heart of the National Growth Area. Also, the engagement material cites that major regeneration projects are in the pipeline to deliver transformative change to Swansea City Centre and adjoining districts. It is also cited that potentially highly significant levels of investment and disinvestment could arise linked to commercial areas along Swansea Bay developed coast and dockland areas. These indicate that Swansea should be planning for much higher levels of growth to support its identified growth potential, particular in line with Future Wales, a plan which the LDP must be in conformity with.

The Local Housing Market Assessment (LHMA) has not been provided as a background paper to this consultation, yet it is described by Welsh Government as a fundamental part of the evidence base. Concerns have been raised by Welsh Government with regards a number of recent replacements LDP's moving forward without the LHMA being in

place and part of the evidence base. Without this fundamental document to set out the housing need (both private and affordable) it is difficult to understand how the housing requirement for the area can be considered.

A higher growth option is required and would be most appropriate. This will provide greater flexibility for the delivery of housing across the County. This is considered necessary in order to account for the existing shortfall as part of the current Plan, as well as providing for the future provisions and demand as part of the LDP2 and to ensure the delivery of housing does not stagnate. It is considered that a higher growth option is required which could reduce the overreliance on the Strategic Sites that have yet to come forward due to deliverability issues. Further land and sites (in the form of smaller sites – i.e. less than 400 homes) should be allocated to aid delivery.

Without a more detailed Housing Supply Background paper it is difficult to provide more detailed comments. With reference to the GSA paper, it is considered that those sites with planning consent (equating to 4,168 dwellings in table 4) ought to be set out in more detail. This will enable far greater certainty over whether they will be able to contribute towards the housing trajectory or whether they will be “aspirational”. There is a significant disparity between the stated supply in Table 4 and the capacity figures identified in the AMR for each housing zone (set out at appendix 5). Access is required to the background information in order to understand this difference. An appropriate level of flexibility for delivery is required. Indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point.

In order to comply with Future Wales, the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Swansea plays and to drive the regional economy.

A more aspirational level of growth should be sought, for the following reasons: Post Covid 19 recovery, energy crisis and Brexit. The planning process must play its part in helping to facilitate the economic recovery that is needed. It will be of utmost importance to ensure that the LDP2 establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South West Wales, taking into consideration the shortfalls over recent years in Swansea and in adjoining Authorities.

A higher level of growth is needed to meet the Vision and fulfil the strategic aspirations for Swansea as Wales’ second city and the key driver for growth in the South West. There will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector.

The LDP has not delivered the level of growth sought. There will be numerous implications of this in respect of affordability, household formation, loss of young people, loss of investment etc. LDP2 should address this by reviewing supply and ensuring deliverable sites are identified and seeking a higher level of growth that reflects the potential of Swansea.

Account should be taken in the baseline figures of the levels of sustainability and self-containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and enhance their vibrancy.

The levels of growth proposed lack aspiration and do not align with the Council's position as set out in Future Wales. The WG central estimates require that 25,600 additional homes are needed in the South West region until 2039. However, there is no analysis of what this means for the number of homes which Swansea should deliver. Neath Port Talbot are at a similar stage in their plan preparation and have indicated during a recent consultation that they are planning for a low number of new homes.

It is disappointing to see that initial scenarios are, in effect, planning for decline. Each of the four scenarios identified are significantly below the current 15,600 dwelling LDP requirement. The Council's rationalisation behind the figures are noted, however there is concern at the proposed significant drop in numbers. It is appreciated that Swansea wants to provide a credible and evidence driven growth scenario for LDP2 so that the plan will be found to be sound and deliverable. However, there has been a longstanding under delivery of the current LDP.

It is noted that a 'dwelling-led' scenario is set out which illustrates the likely impact on population growth and levels of employment supported if rates of delivery were sustained at 485 homes per annum. Projecting forward based on previous recorded levels of housebuilding is not considered to represent a credible option to support future economic growth. When modelled, this level of housing delivery would not sustainably support a sufficient demographically generated labour force needed to support even the baseline level of economic growth and could as a result have implications for increasing levels of in-commuting.

There is a need to address the under delivery of the larger strategic sites. It would be beneficial to allocate smaller scale sites between a range of 100 – 300 dwellings on developer led sites. These viable sites offer a faster, more

immediate resolution to this under delivery rather than relying on large scale strategic sites which are often caught up with long lead in times and delayed build out rates.

To ensure that affordable housing need is met on a consistent basis, not just across Swansea as a whole but also in defined areas of need, appropriate provision needs to be in place, by way of allocating deliverable sites for both open-market-led sites and also 'H5 sites' (*reader note – H5 sites are 'Local Needs Housing Exception Sites' in the Adopted LDP 2010-2025*).

Support for the approach of discounting landbank sites and future windfall delivery and consider the use of a percentage discount as good starting point. However more detailed analysis should be undertaken, particularly on sites which have been rolled over from previous earlier plans.

The Authority consider that they have 6,913 dwellings under construction, in land bank or windfalls, which in reality means there is only a proposed residual requirement for around 3,500 dwellings. For the size and status of Swansea, this is insufficient and especially with only a minimal 10% buffer proposed (the previous LDP had a buffer of 20%, and most recently Bridgend Country Borough Council have adopted their LDP with a 15% buffer). This reflects a lack of ambition by Swansea for LDP2, and will have major implications on providing deliverable and viable allocations.

It is noted that the latest evidence identifies that Swansea's population has not grown at the rate that was forecast by the most recent WG projections. The published 2021 Census data suggests that there has been a slight fall in population within Swansea since the last Census in 2011. There are concerns over the validity of the Census data, in large part due to the 2021 Census being undertaken at a time impacted by the COVID pandemic. The most recent official annual estimate of population for 2022 suggests that the population has grown quite significantly over a single year, which has been attributed mainly to net international migration. Clearly there is further work to be undertaken.

## Appendix 2: Summary of comments received on Spatial Approaches

*Table 5: Summary of comments received on the spatial approaches*

<b>Urban/Brownfield focus</b>
<p>A greater proportion of brownfield sites would be beneficial for biodiversity at a landscape scale.</p> <p>From an ecological perspective, the Urban/Brownfield approach is likely to have the greatest net benefit in theory, though it is noted that some brownfield sites can be particularly rich in biodiversity.</p> <p>Supportive of brownfield sites as a starting point and note the potential benefits from regeneration, however this approach alone is unlikely to deliver a suitable range and choice of housing to serve the needs of the Authority.</p> <p>Objection to the sole reliance on urban/brownfield development for the spatial strategy of the LPD2 and do not consider this to be a viable option to meet the future growth of Swansea.</p> <p>Urban and brownfield sites are often heavily constrained with land remediation costs and ground investigation works identifying numerous abnormal costs which significantly impact the viability of development. Furthermore, this often increases the complexity of development, which subsequently impacts their delivery with long lead in times, delays throughout the planning process and on site adding a significant lag time to when works can commence.</p> <p>This approach would only further exacerbate the historic under delivery of housing and does not reflect the urgency of the housing needs of the County.</p> <p>Strongly object to the notion of steering development away from greenfield sites and do not consider this approach to align with the objective for sustainable development. The approach relies heavily on a sufficient supply of brownfield sites appropriate for re-development. A more sustainable approach would consider a broader range of sites, both greenfield and brownfield sites to provide a more reliable housing trajectory than urban/brownfield only.</p>



The provision of a primarily urban/brownfield strategy would be very short sighted. Caution is raised against a solely urban/brownfield focus.

A strategy which focuses on urban/brownfield land would deliver an insufficient number and choice of units due to the lack of availability of such sites and the evidenced viability and deliverability constraints associated with complex brownfield land.

Concerns are raised towards an approach where future growth would likely be clustered around city centres and district/local centres.

This approach would likely rely on brownfield sites and therefore encounter risks associated with delayed delivery and viability. However, an approach that seeks to supplement brownfield sites with greenfield development is supported. Greenfield development is vital to achieve and deliver growth during the LDP2 plan period.

### **Strategic Placemaking focus**

This approach would benefit for a landscape approach to Green Infrastructure in the widest sense. The retention and maximising natural capital of existing GI is really vital, both for biodiversity and to maximise ecosystem services.

Strategic Placemaking should form the core element of the spatial strategy that LDP2 takes. However this should probably be alongside a small number of smaller allocations to ensure delivery in the short term as it can take time for strategic sites to begin delivering homes.

As a spatial approach, Strategic Placemaking ensures the delivery of housing at a scale where it can be provided as part of a mix of uses, alongside meaningful active travel and public transport improvements, and incorporating a landscape-led approach.

The best way to deliver the needed development for the LDP2 is a hybrid option of Spatial Option 2 (Strategic Placemaking Focus) and Option 4 (Highly Connected Communities). This is the most pragmatic and appropriate option to distribute growth across the City and County of Swansea going forward for the LDP2.

As a first stage it is agreed that urban /brownfield land with high sustainable credentials should be exploited as far as possible. There is great importance in smaller scale residential allocations to supplement strategic allocations and these will likely require green field sites in sustainable semi-rural locations. This is promoted within the Strategic Placemaking approach.

These greenfield sites are often less complex to bring forward than large brownfield sites with often complex land assembly issues. Smaller green field sites therefore have the important role of early phasing and delivery within the first phase of the plan period to deliver much needed homes promptly.

Supportive of a Strategic Placemaking approach towards future growth. It provides the opportunity for new development to positively address existing issues by creating a planned environment to suit / cater for a critical mass of population, services and facilities. These can fundamentally contribute towards the well-being goals through numerous ways. These concepts are best delivered over the longer term and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits.

Applying a coherent and distinctive urban design concept and master planned approach (that combines innovative solutions and reflects local characteristics) results in communities and developments that have a strong local identity and effective integration with the existing community. This can secure wider benefits, including in regards the economy and delivering a housing mix.

The previous strategic development and placemaking approach hasn't performed and 'delivered' in respect of the housing target identified in the LDP. A different approach is required for the LDP2.

Concern that there could be a focus on a limited number of large strategic scale sites of 400+ homes each. This focus on larger sites introduces further delay to housing delivery fails to recognise the urgency of this issue given the historic deficit.

Elements of this approach show potential to facilitate growth in Swansea, however a more equal balance between strategic sites of different scales, and sizes should be struck. Utilising smaller sites between 100-300 dwellings would address the existing shortfall in an effort to tackle the on-going deficit in the short to medium term via early and immediate delivery.

A continuation of the focus upon Strategic Development Areas (supported by a limited number of smaller allocations) presents the most appropriate option for the spatial distribution of growth.

The inclusion of complimentary smaller scale sites to provide a greater range and choice of housing is supported. This recognises the complexity of strategic sites and their associated long lead in times for delivery and promotes the use of smaller sites that are available immediately to supplement this delay for early delivery. This would provide a more reliant and stable housing supply for the plan period compared to other approaches proposed.

The lead-in time associated with the delivery of large-scale mixed-use strategic sites, combined with the wider delays in the delivery of housing experienced across Wales over the last 3 years (associated with the impact on the housebuilding industry of COVID 19; labour supply issues; rising costs of materials; supply chain problems etc) has resulted in the rate of delivery being slower than anticipated.

### **Dispersal Focus**

The option is less sustainable than the strategic placemaking approach in terms of environmental impacts, sustainable transport and placemaking.

Small scale development would be more appropriate.

Supportive in principle of seeking to disperse growth to individual communities. In practice however, this is unlikely to deliver the benefits that the strategic placemaking approach can. Indeed, smaller scale allocations provide less certainty in terms of the benefits, sustainability and improvements that they can bring.

Based on delivering community led solutions, it is considered that the most appropriate growth and spatial allocation scenarios are either the Dispersal or Highly Connected Communities approaches.

Support new development opportunities across a large number of small scale sites, resulting in a greater range of sites and opportunities for residential development across the County. This would ensure that communities can accommodate sustainable growth and deliver much needed affordable housing across the region for the benefit of local people.

Strongly support the notion of allocating greenfield sites and providing affordable housing in order to achieve future growth.

The emerging spatial strategy should support development opportunities that have been identified across communities for smaller scale sites that are deliverable and achievable. The distribution of spatial growth must include the allocation of a number of smaller/non-strategic dispersed site allocations, rather than progressing with a continued reliance on the delivery of Strategic Sites to deliver the vast majority of housing numbers.

The inclusion of a greater number of more widely distributed non-strategic allocations will assist in ensuring that a range/choice of units come forward, which can contribute to the Authority's housing land supply in the short/medium term (by virtue of the less complex nature and associated shorter lead-in time of such sites in comparison with the strategic-scale allocations).

By distributing and dispersing housing numbers more widely throughout the Authority area, development opportunities will be spread across all wards, with new housing (including affordable housing) distributed to more communities.

An approach which focuses on a higher number of smaller scale sites with a highly dispersed approach to growth across the County would not be supported. Such an approach restricts the delivery of strategic placemaking objectives and the opportunity to secure infrastructure on a strategic scale.

There is a need for medium sized sites and move away from overreliance on solely strategic sites.

The Dispersal approach has a number of positive benefits and provides something for everyone seen to be providing a fairer division of development over all wards rather than intensive developments in certain limited areas.

By nature of the approach a larger number of smaller scale green field sites would need to be developed.

A lack of focus on connectivity to existing services would not provide positive benefit to existing local and district centres, some of which are in need of increased footfall/ patronage.

Sensitive selection of green field sites would need to ensure those allocated are away from flood risk, not within protected areas, and are well connected to existing facilities in order to bolster those existing communities and the range

of facilities and services they offer. This could mean ultimately, due to constraints, some wards do not gain any development.

## Highly Connected Communities

The sustainable element of this approach (i.e. facilitating less dependence on cars) would in theory be beneficial for climate change which is a cause of biodiversity decline at all levels. However, whether this has a perceivable impact/benefit on biodiversity locally is undetermined.

Although a Strategy which looks to focus growth on sustainable 15/20-minute neighbourhoods presents benefits in terms of spatial sustainability, it is not considered that such a strategy could deliver an appropriate level of growth across the County, resulting in a lack of development/investment in less connected areas / unconnected communities.

If this approach encompasses more brownfield sites over greenfield sites (when compared to other approaches), then that would likely be beneficial for biodiversity as less semi-natural habitat would be lost. This is in line with the general principle of mitigation hierarchy (i.e. avoid, mitigate, compensate).

This is the most appropriate strategy as it would promote co-location of homes and jobs, which would reduce out-commuting and promote an active and healthy lifestyle, particularly where neighbourhoods have mixed land uses. provide the best opportunity for Swansea to satisfactorily and appropriately address the key issues, challenges and opportunities that the County faces.

Considered that this is the most pragmatic and appropriate option to distribute growth across the City and County of Swansea going forward for the LDP2.

This Option is similar to that of the adopted strategy, in the sense that it seeks to create sustainable developments close to established urban areas, albeit, that growth is also allocated in the most sustainable locations (where there are opportunities to connect to and upgrade existing Active Travel and Public Transport links and reduce private car use).

It is considered that this represents a sustainable and viable option that will not only enhance green growth and renewable energy developments, but through directing the majority of growth to the most sustainable locations with Active Travel and Public Transport infrastructure.

The best way to deliver the needed development for the LDP2 is a hybrid option of Spatial Option 2 (Strategic Placemaking Focus) and Option 4 (Highly Connected Communities). This is the most pragmatic and appropriate option to distribute growth across the City and County of Swansea going forward for the LDP2.

The four spatial approaches – urban/brownfield, strategic placemaking, dispersal and highly connected communities – are all based on the assumption of growth. This is a questionable assumption that throughout is presented as a given, foundational to the conversation. Nonetheless, the highly connected communities approach is potentially an integrative strategy, and if it were to include mixed land use, including food production, wildlife corridors, and a full-range of green spaces, then it could become an approach suitable for the whole of Swansea, and the envisioning of a transformed, climate emergency and food-shock ready, biodiverse county.

This is the most appropriate strategy.

Based on delivering community led solutions, it is considered that the most appropriate growth and spatial allocation scenarios are either the Dispersal or Highly Connected Communities approaches.

Support the potential for a highly connected communities approach, however, matters in respect of sustainability ought to be rightfully considered as a part of the wider site selection process. It is noted that lack of land availability is likely to limit growth immediately adjacent to City and Town Centres and as such opportunities ought to be explored on larger sites that provide an opportunity for linking into and improving existing active travel routes and providing a range of land uses that reinforce local levels of sustainability.

This approach should be pursued as it directs development to the five main areas – Central, East, North, West and Greater Northwest, and focuses growth to district/local centres and along high quality, frequent public transport routes.

Although a strategy which looks to focus growth on sustainable 15/20-minute neighbourhoods presents benefits in terms of spatial sustainability, it is not considered that such a strategy could deliver an appropriate level of growth across the County, resulting in a lack of development/investment in less connected areas / unconnected communities. An approach that is well Connected to communities and focuses around proposed Metro modes is understood to be a strong strategy yet leaves outliers lacking investment and certain semi/ rural areas that are less well connected open to potential decline in future.

A 15/20 minute max by active travel to services and facilities would appear practical and a number of semi-rural areas could fit this approach and provide sustainable edge of centre sites within the radar.

### **Housing Need Clustering Focus**

Supportive of an approach to future growth that seeks to maximise addressing housing need, this is unobjectionable. However, housing need ought to be one of a number of factors considered in feeding into spatial distribution of growth alongside matters including sustainability and placemaking objectives.

Considerable concerns towards the deliverability of this approach across the County and do not consider it achievable where it is centred on areas of greatest Affordable Housing need.

This approach may encounter difficulties in gaining support due to viability issues. Furthermore, this approach would fail to deliver housing across the whole County, and result in the over-concentration of housing in the identified clusters which raises questions regarding its sustainability.

There are not enough sites within these areas of need to meet the demand. Whilst affordable housing is an important part of the future growth of Swansea, we consider this can be delivered via an alternative approach and should not form the sole reason for growth and dictate where development should occur.

It is not considered that this approach provides a workable solution to spatial growth as areas of greatest affordable housing need may not present viable development proposals thereby restricting delivery, as well as potentially bringing about pressures associated with an overconcentration of development within some areas of the County.

Housing need and clustering majors on the delivery of affordable housing in locations proven to be in need from the latest HMA evidence. The inclusion of both green and brownfield sites is supported in terms of the provision of homes in those areas of need not just restricted to the city of other urban areas. It is considered this approach can usefully inform the ultimate special concept to growth.

## Appendix 3: The LDP2 Engagement Diary (as at October 9 2024)

Table 6: The LDP Diary October 2024

Event Detail	Narrative	Date(s)
Member Briefing	LDP Review and Replacement LDP Update	February 2023
Council Meeting – Review and Replacement	<a href="https://www.swansea.gov.uk">Report - Corporate Template (swansea.gov.uk)</a>	March 2023
DA consultation	Facebook Posts Issued Drop in sessions 27 <sup>th</sup> March and 6 <sup>th</sup> April.	April 2023
Review Report Consultation		April 2023
Council Meeting – Approve Final Review Report	<a href="https://www.swansea.gov.uk">Report - Corporate Template (swansea.gov.uk)</a>	July 2023
Candidate site call and Draft ISA Scoping consultation		Aug-Oct 2023
Community Council Forum	LDP Update	21 June 2023
Nature Conservation Engagement	Briefing on LDP2 and Timescales	July 2023
Engagement with Education, Housing and Estates Depts	Assisted them to submit candidate sites	Sept/Oct 2023
Engagement with Tourism Swansea Bay	Engagement with Tourism Swansea Bay	5/12/23
Update presentation to full Council on LDP2	Member briefing on LDP2	30/1/24
Face to face Tourism industry meeting	Event in conjunction with Tourism Dept – LDP2 presentation	21/2/24
Face to face Members Engagement Group (MEG) @ Guildhall and virtual.	Session 1 – Issues, Vision Objectives.	27/2/24
Face to meeting with PSB Operational Group @ Guildhall.	Initial overview of LDP2 provided to attendees (internal and external partners).	29/2/24



E mail circular sent to officer groups within the Council by theme / service area.	Emerging Key Issues, Vision, and Objectives circulated for comment.	1/3/24 to 20/3/24
Face to face Members Engagement Group (MEG) @ Guildhall and virtual.	Session 2 – Strategic Options	13/3/24
Opening of LDP2 Virtual Exhibition Room (e mail goes out 18/4/24 to LDP consultation database).	'LDP2 - <i>Starting the Conversation</i> ' Informal engagement on Key Issues, Vision, Objectives and Strategic Options. Summary documents available for comment. Facebook Posts Issued	18/4/24 to 31/5/24 <b>(extended to 14 June 2024)</b>
Drop-in sessions @ Discovery Room, Swansea Central Library.	Sessions held to support the ongoing conversation on Key Issues, Vision, Objectives and Strategic Options.	7/5/24 & 21/5/24 9am-6.30pm
Email sent to PSB operational group contact	Advising PSB contact of ongoing consultation	E mail sent 9/5/24
Publication of Technical Background Paper 1: ' <i>Key Issues, Vision and Objectives</i> '.	Paper published to support the ongoing conversation on Key Issues, Vision, and Objectives (KiVO).	17/5/24 email goes out 20/5/24
Publication of Technical Background Paper 2: ' <i>Growth Scenarios and Spatial Approaches</i> '.	Paper published to support the ongoing conversation on Strategic Options (growth and spatial).	17/5/24 email goes out 20/5/24
SWW Regional Transport Plan workshop	Officer workshop (online / virtual) LDP team attended	20 May 2024
Swansea Bay Health Board meeting	Initial discussion on LDP2 – ongoing liaison to take place	20 May 2024
Swansea Council Tourism Team	The Council's Tourism Trade Newsletter dated 20 <sup>th</sup> May 2024 ( <a href="http://www.swansea.gov.uk/tourismupdates">www.swansea.gov.uk/tourismupdates</a> ) contained an article advertising the LDP2 drop in consultation session on the 21 <sup>st</sup> May.	20 May 2024
Welsh Government: Development Plans Branch	Meeting to discuss progress, notably growth/housing bank	22 May 2024
DCWW meeting	Initial discussion on LDP2– ongoing liaison to take place	24 May 2024
NRW meeting	Initial discussion on LDP2– ongoing liaison to take place	14 June 2024

Transport for Wales meeting	Discussion around emerging Metro proposals	20 June 2024
PEDW seminar on LDPs	Overview of LDP process including examination	27 June 2024
NPT CCS officer meeting	Discussion to catch up with cross border matters	2 July 2024
Meeting with DM to discuss emerging policies	Discussion on internal policy dev	3 July 2024
NPT CCS officer meeting	Heat Mapping Opportunities Workshop	10 July 2024
NRW meeting	LDP Green Infrastructure Assessment and Area Statement Resilient Ecosystem Networks liaison meeting	2 August 2024
Menter Iaith Tawe	Meeting to discuss Welsh language	11 September 2024
GI engagement event and drop in	LDP Green Infrastructure Assessment drop in event	17 September 2024
Attendance at Swansea Bay UHB Workshop	Discussion on LDPs	18 September 2024
Face to face Members Engagement Group (MEG) @ Guildhall and virtual.	Session 3 – Preferred Strategy – key components .	23 September 2024
Second Homes and Affordability Pilot: Action Learning Workshop (virtual)	The purpose of this workshop is to share lessons learnt from the implementation of second homes and affordability policies with stakeholders who might be interested	25 September 2024
Regional Minerals Collaboration Meeting	Discuss regional minerals matters	2 October 2024
Developer Forum meetings - regular updates provided	Agenda item to provide updates to the group	Regular scheduled meetings - ongoing
Council Asset Management Group meetings - regular updates provided	Agenda item to provide updates to the group	Regular scheduled meetings - ongoing

Cross Border meetings – regular meeting with NPT and also Carmarthenshire		Regular scheduled meetings - ongoing
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