

**REPORT ON CONSULTATION UNDERTAKEN ON DRAFT Supplementary Planning Guidance  
Placemaking Guidance for Residential Development**

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

**City & County of Swansea Council  
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## REPORT ON CONSULTATION UNDERTAKEN ON DRAFT SPG – PLACEMAKING GUIDANCE FOR RESIDENTIAL DEVELOPMENT, 2021

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

#### Introduction

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

The respondents have been allocated number references as follows:

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



## Engaging Children and Families

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

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

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

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

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

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



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

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

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



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



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

#### What things are important to include in new places to live in Swansea?

Respondent	Summary of comments	Council response	Recommended change
13	<p>St Modwen Homes believes that a range of dwelling types &amp; sizes; connections to existing development to provide access to shops, schools, medical facilities etc; and blue/green infrastructure including public open space and areas for formal and informal play for all ages are all important in creating successful places.</p> <p>If a scheme follows a clear and logical design process and sequence of design principles, considering the key ingredients of context, movement, scale, proportion, landscape setting, sustainability and building form; this is the framework within which placemaking can emerge.</p> <p>Alongside the technical elements, however, there also needs to be a meaningful understanding of how people will use the development; how they will move, where they will gather, to ensure all developments contain the elements required to create a place where people want to live.</p>	This response demonstrates that developers are embracing the placemaking approach and this can be communicated by the Design and Access Statements.	No change

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

Respondent	Summary of comments	Council response	Recommended change
11	<p>There are existing places (recently built developments) that provide examples of good placemaking practice, and there are existing places (generally historic townscapes) that provide inspiration. These places can be found in all parts of the World, but for the purpose of this Placemaking SPG and this question, one assumes that examples in the United Kingdom, Wales or even Swansea are being sought.</p> <p>In Swansea, the best places are found in parts of the city such as the Uplands and the Mumbles. These places are inherently walkable, possess a rich architectural character and have a good mix of uses. The density of these parts of Swansea are relatively high, cars are parked on street and separation distances are quite low. Along with good green infrastructure and exploitation of natural features (such as the shorefront) these places provide inspiration and examples of how a flexible attitude towards parking standards, highway design can lead to better placemaking.</p> <p>There are also the tight knit villages of Gower such as Port Eynon, Bishopston, Reynoldston and Llanrhidian which can provide inspiration for new places to live. These villages exhibit historic character, streets created organically primarily for</p>	This response helpfully points out that many existing areas of Swansea possess positive placemaking qualities and have been successful places to live for over 100 years. This is touched upon in the document but there is an opportunity to increase the emphasis on learning from existing places.	<p>Expand introduction text paragraph 1.7 to reference existing successful sustainable places as follows:</p> <p><i><u>There are a diverse range of established places in Swansea that have achieved exactly this aim. These vary in character from the vibrant, dense urban areas of Uplands and Mumbles, to the many beautiful Gower Villages. The placemaking approach is not one that seeks to reinvent the wheel, but instead aims to guide us to understanding what makes existing places 'work best' for the people that live and spend time there, and to use these attributes as precedents for 21<sup>st</sup> Century Living.</u></i></p> <p><i><u>Add image of Uplands after paragraph 1.7 to make this point.</u></i></p> <p>Expand Section 3 to ref existing successful places as precedents as new paragraph after 3.7:</p> <p><i><u>3.8 There are many areas of Swansea that vary significantly in terms of their character, but that exhibit the attributes that ensures they are successful and sustainable places to live. These range from the relatively dense, urban</u></i></p>

	people, informal greenspaces, and a wealth of details, all of which can inspire the design of new places to live.		<p>settlements of Uplands, Mumbles, Morriston, to the various Gower villages and rural fringe areas that have their own distinctive character. The placemaking approach does not seek to reinvent the wheel but instead aims to help us understand what makes existing places 'work best' for the people that live and spend time there, and to use these attributes as precedents for 21st Century Living. For example the Victoria grid is a walkable neighbourhood designed before the advent of private vehicles; the grid concept can be used to underpin 21st Century placemaking and updated for electric vehicle charging and street greening.</p> <p>Amend paragraph 4.2 as follows:</p> <p>Drawing on the national and local placemaking context, including the 7 Well-being goals of the Well-being of Future Generations Act (2015) and learning from relevant successful sustainable places, this Guidance .....</p>
13	Marmalade Lane in Cambridge is also worth including in the SPG. It is a sustainable neighbourhood of 42 dwellings with community facilities and shared gardens that is laid out in terraces creating attractive, people-friendly streets to the front with lovely gardens behind, car parking to the periphery and bins in communal stores, conserving the outside space for people's enjoyment. The homes are contemporary and are finished in one of four brick colours with generous porches, balconies and private gardens ( <a href="https://marmaladelane.co.uk/">https://marmaladelane.co.uk/</a> ).	This development is a good precedent for contemporary sustainable urbanism and would be a positive inclusion in the document.	<p>Add image after paragraph 1.13 and caption text as follows:</p> <p>Fig 1.2 Marmalade Lane in Cambridge is an example of how new suburbs can be more dense, high quality and green learning from the best of the past as part of the placemaking approach. There is no reason why this cannot and should not be achieved in Wales and a number of schemes in Swansea are embracing this approach.</p>

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

Respondent	Summary of comments	Council response	Recommended change
10	General labels on maps should be larger and maps should be clearer	All figure text and annotations are legible, plus as an electronic pdf document the user can view on a larger screen and/or zoom if necessary.	No change
3	Firstly, the principles and structure of the draft document are welcomed and supported, albeit some of the sections are 'very wordy' and could be edited to help reduce the overall 'bulk' down from the current 104 pages.	The broad support for the document is welcomed. The length of the document is a result of the wide ranging placemaking aspects to be addressed in the guidance modules and fact that the document is well illustrated.	No change to reduce length of main document but edit to refine language and reduce words where possible without changing the guidance. A Non-technical summary document has been prepared.
6	We would like to take this opportunity of confirming that the outline and main points of the draft document have been read and agreed; though we would like to point out that some sections seem to be overly 'wordy' and we would recommend that these are reviewed to reduce the size of the of document to make it more readable.	It is not intended that the document is read from cover to cover but rather is a reference of guidance where the reader can go directly to the relevant section such as guidance for 'streets as places' etc.	

11	<p>The Guidance Modules are clear, and they highlight the Key Questions and Principles in a way that can be easily identified and followed. This is the key part of the SPG and is easy to understand.</p> <p>Whilst the draft document is easy to understand, at 104 pages seems overlong. The first part of the SPG (over 30 pages) provides the philosophy and policy context. Reference is made to many different best practice and policy documents, each containing criteria for successful Placemaking. The message is fairly consistent between these documents, but this background setting seems overlong and there is a danger that developers may be overloaded and confused by the sheer variety of best practice guides.</p> <p>Is there a way of condensing or summarising these into the consistent themes and then showing a clear link between these themes and the Swansea Placemaking SPG?</p>	<p>Furthermore, the existing 2014 document is some 90 pages long and this has not hindered the use of this guidance.</p> <p>Therefore it is not considered necessary to reduce the length of the document, but some sections may benefit from editing to refine language and reduce words where possible without changing the guidance, plus a concise non-technical summary has been prepared. This is not part of the guidance and is a summary for non-professions.</p>	
14	<p>The document is a valuable and welcome development of earlier policy. Such consultations focus on possible improvements and omissions and hence responses can appear negative. The comments made are intended positively to encourage more focus on sustainable city and suburban living environments as alluded to in the text (fig A1 pg32).</p> <p>In general, we consider the document to be too wordy and inaccessible. The 'principles' should be offered up front, before the 22 pages of off-putting statutes etc (which could well be placed in an appendix) and, even then, the summary principles can be reduced to a series of simple objectives, expected by the authority (rather than attempting to cover all angles). Is it clear that these policies will be observed by the Local Authority, not least for CCS developments and road schemes?</p>		

3	Propose the inclusion of the Welsh Government - “ <b>Building Better Places</b> ” (July 2020) policy document be included and referenced in this section.	Building Better Places, published by Welsh Government in summer of 2020, emphasises the importance of placemaking even more so as part of the post-covid recovery. This is very clear in the Ministerial Foreword by Julie James Minister for Climate Change which emphasises placemaking and planning.	Update section 2 to include summary of relevant current Welsh Government Guidance such as ‘Building Better Places’ after Planning Policy Wales (2.11) as follows:  <b><u>Building Better Places: Placemaking and the Covid-19 Recovery, July 2020.</u></b>  <u>2.12 This Welsh Government document supplements Planning Policy Wales and increases the emphasis on placemaking and green infrastructure. The following extracts from the document highlight how planning decision making needs to attribute significant importance to these issues, and identifies the potential adverse impacts of not ensuring placemaking principles are adhered to:</u>  <u>“We have all spent more time in our neighbourhoods during the weeks of lockdown and we can all appreciate the difference between having a quality environment to live, work and relax in and how being cut-off from our friends and family can mean that a poor environment, with no or limited access to local goods, services and green spaces can have a severely detrimental impact on our mental and physical health and well-being, as well as our ability to protect our livelihoods.</u>  <u>Now, more than ever, we need to think about places and placemaking. This will be our core value in the work we take forward to bring about recovery in Wales. The regenerative action we take at all levels will be driven by integrated thinking and not short-term expedience which can have negative longer term consequences.”</u>  <u>Foreword from the Minister Julie James MS (p2)</u>  <u>“With exercise and social contact so vital to our health and well-being, the pandemic has reinforced the need for well-designed, people orientated streets. This forms the basis of the ‘active and social streets’ policy in PPW, which is supported by Manual for Streets6 and its companion guide Manual for Streets 27. PPW is clear that the design of streets should be based on urban design principles and not the conventional engineering-led approach in the now superseded Design Bulletin 32.</u>  <u>Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets. The Welsh Government will support decisions of this nature to help create better places.”</u>  <div>(Building Better Places p17)</div>
6	It is important to include Welsh Government’s <b>Building Better Places</b> policy document (issued July 2020).		



3	In para. 2.14 you should include and reference the new Draft CCS Street Design Guide.	The emerging Street Adoption Design Guide is following on from the Placemaking Guidance for Residential Developments; this sets out a process for providing and adopting 'non-standard' place led streets that are safe, accessible, maintainable, green and integrate to quality of life.  It is not appropriate to reference this in paragraph 2.14 which summarises movement policy at the national level but the reference can be added to the 'Local Policy and Guidance' section after paragraph 2.46	Update document in section 2 to include summary and link to Street Adoption Design Guide as follows:  <b>Complementary SPG and Other Guidance</b>  2.35 <u>As well as adopted SPG, there are other Council Guidance documents that may be relevant to guide proposals. Of particular note is the Council's Street Design Guide, which sets out detailed standards to ensure safe and accessible place-led streets are delivered, as advocated by PPW, TAN 18, the Swansea LDP and Manual for Streets. This document is not SPG and is instead a user guide for developers that will be updated from time to time as necessary. It sets out the key principles and provides various examples to illustrate how placemaking can be successfully integrated into the design of streets at various scales. The Streets Design Guide can be found on the Council website.</u>
6	In addition, in para 2.14 the new draft CCS Street Design Guide should be included.		
6	In Paragraph 2.20 (Bullet Point 6) entitled Plot Based Development, we are pleased to note the statement: "to create varied and interesting places and to open up the market to small and local builders to provide the opportunities for small plots". However, under current planning policy, there is no incentive to encourage larger developers to sub-divide their sites to sell for the development of small plots or self-build projects. A way forward may be to relax the affordable housing requirements and to apply other S.106 obligations for these plots to enable landowners and developers to be motivated to propose opportunities for the development of smaller plots.	Paragraph 2.20 is a summary of national policy document Future Wales and the SPG cannot change or introduce new policy.  The Policy requirements for affordable housing are set out in LDP policy and this SPG cannot amend this requirement however the s106 contributions can be negotiated on a site by site basis via the open book 'Development Viability Model' process where necessary to ensure a balance of delivery and necessary contributions to community infrastructure.	No change
3	Para. 2.20 – Bullet Point 6 – <b>Plot Based Development</b> – We support the recognition " <b>to create varied and interesting places and to open up the market to small and local builders to provide the opportunities for small plots</b> ". However, current planning policies do not provide any incentives to larger developers to facilitate the sub division of their sites for selling off small plots / self build. Perhaps therefore, the relaxation of affordable housing requirements and other S.106 obligations should be applied on such plots, so that the main landowner / developer can be incentivised to bring forward such small plot opportunities to the market.		
15	Generally supportive of the contents of the draft SPG however would like to ensure the document allows for an element of flexibility for future development sites if required.	All SPG is guidance that expands on Development Plan policy. The document is therefore not a 'set of rules' and can be applied flexibly as evidenced by the positive dialogue on a wide variety of sites using the current 2014 residential design guide.	Amend paragraph 1.5 as follows to repeat text from 5.3 in introduction:  The Guidance can be applied in urban, suburban and rural areas. The main focus of the guidance is on schemes of ten or more dwellings or proposals on sites of 0.5 ha or more, however it is relevant as a material consideration for all
13	Whilst the majority of the SPG is focused on the principles of placemaking, some of the prescriptive content could slow down the application process and encourage subjective decision		

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

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

Respondent	Summary of comments	Council response	Recommended change
11	<p>The greater emphasis on placemaking, sustainable urban drainage and green infrastructure is entirely appropriate and aligns the SPG with all the best practice being promoted by the Welsh Government and the Design Commission for Wales.</p> <p>The Guidance modules section is clear and helpful. It also provides principles as opposed to rules allowing for some flexibility according to site conditions and other factors. The draft document includes most of what it should in terms of an explanation of the importance of Placemaking and the philosophy behind this; setting out the policy background; and providing clear and easy to understand Principles and Key Questions for applicants.</p>	Support for the document is noted and this respondent has commented how the guidance modules set out principles as opposed to rules and recognises that this can be applied flexibly.	No change
8	We welcome the references to biodiversity enhancements and green infrastructure throughout the documents however, due to the nature/general focus of the SPGs we wouldn't have any further comments.	Support for the inclusion of biodiversity and green infrastructure is noted.	No change
5	It is noted that much of the newly drafted Residential Design Guide follows a similar, if not the same ethos as that which is currently adopted. Coastal and Pennant have worked with Swansea and within the parameters of the existing Residential Design Guide and therefore in principle, support the objectives. Coastal / Pennant are committed to the delivery of a high-quality product both in affordable and open market positions.	Support for the document following the previous 2014 version is noted.	No change
11	The idea of a Planning Performance Agreement (PPA) sounds good – this needs to be explained in the SPG document. Is this an agreement between developer/applicant on what was agreed during the pre-application stage? Will it include a commitment from the highway authority to adhere to the agreement and the planning consented scheme when the highways adoption stage is reached?	The benefit of Planning Performance Agreements is set out in paragraph 3.3 which includes resourcing collaborative working with Council Departments feeding into the Development Management process.	No change
11	<p>The importance of the pre-application process is fully supported. This should be a multistage process starting at site/contextual analysis, moving on to vision/concept and on to design proposals. It is vital for developers that the pre-application service offered by the Council is joined-up and includes all the key departments.</p> <p>Developers need a pre-application service that brings in all Council disciplines to consider their design proposals: planners, urban designers, ecologists, highway engineers and drainage engineers.</p>	The importance of the pre-application process is highlighted in section 3 but there is an opportunity to emphasise that this is currently a multi-disciplinary process.	<p>Amend paragraph 3.1 to emphasise that the pre-app is a collaborative process bringing in all Council disciplines as follows:</p> <p>3.1 Pre-application discussions with the Council can assist in improving new places by identifying and addressing any key placemaking opportunities and issues at an early stage. <u>The feedback provided is multi disciplinary including inputs from strategic planning, placemaking, ecology, drainage, landscape highways, and other relevant Council service areas. This constructive, holistic and collaborative approach can speed up the determination of any subsequent planning application, and ultimately will lead to improved outcomes in terms of new places created.</u></p>

12	New streets should have trees and greenery and not be full of cars (from conversations with families and children at the play sessions). This was a strong message from children and their parents/ carers which aligns with the national emphasis on green infrastructure and for designing streets as places not dominated by vehicles. The document sets out these requirements and this is a positive endorsement of this approach.	The 'Streets as Places' section has been subject to input and review by Transportation Colleagues.  This section of the document clearly sets out the process for providing place-led streets via the stage 1 safety audit, tracking analysis and visibility analysis to ensure that these are safe, accessible, maintainable, green and contribute to quality of life.	No change to document.  Ensure ongoing collaborative internal working with placemaking input into emerging Streets Design Guide and ensure continuing collaborative working with Transportation Colleagues in respect of place-led streets in planning applications.
4	The Webinar question and answer session indicated the following:  There are exemplars of placemaking emerging in Swansea but these may be unravelled by highway adoption requirements.  Whilst there is a process to challenge planning decisions, there is no means to take disputes at the adoption stage to arbitration.  Whilst the stage 1 safety audits may help prove place-led streets are safe, this is an additional cost to developers	This process to test and agree place led streets at the planning stage has been used successfully on a number of sites that now have planning approval.  The Supplement to PPW, Building Better Place, July 2020 reminds us that " <i>Planners should continue to challenge orthodoxies, mind-sets and development proposals which are based on outdated practices and standards, such as those in Design Bulletin 32, and promote creativity, joint working and street designs that respond to the guidance in Manual for Streets. The Welsh Government will support decisions of this nature to help create better places.</i> " (p17)	
11	With highway and drainage engineers the input at the planning stage is often overturned at the adoption stage causing immense challenges for developers. It is therefore vital that the adoption engineers are involved at the pre-application stage. If they are not, they need to be fully signed up to the planning stage highway guidance that the developers receive. This is possibly the single greatest frustration for developers in Swansea.	The emerging Streets Design Guide is subject to inputs from the Placemaking Team and this document endorses the same process to provide place led streets in accordance with Manual for Streets. Therefore, there is no reason why a place led street should not be adopted but this may require additional committed sums to fund maintenance of street trees and uplift surfaces.	
3	The opening paragraph (1.1) sets out the clear intentions of the document, however, as developers we have been extremely <b>critical at the lack of joined up thinking between the Planning Department and the Highways Department</b> in CCS and having read the whole of this draft SPG there is no reference to the current Draft Streets Design Guide (which is being progressed through separate consultations via the Highways Dept) until we reach Section F (para. F.7). We would therefore, strongly suggest that the referencing and integration of the new <b>Streets Design Guide</b> should be included at the forefront of this document and referenced throughout in order to ensure "clear and consistent guidance on matters relating to Placemaking and Design for all types of residential and mixed use development to create places to live" is upheld.  In Section F – Streets as Places, we would expect this SPG to have direct reference at the beginning of this section to the new emerging Street Design Guide that is being produced by CCS Highways Dept. (albeit we understand that the draft Street Design Guide still requires substantial amendments to bring it into line with the new Placemaking objectives).  Para 2.44-2.45 needs to include for the emerging Street Design Guide.	Planning/ Placemaking Officers will continue to collaborate with Highway colleagues at all stages of the development process to ensure that place led streets approved via the planning process are delivered on site.	



15	<p>Within the Teams presentation for the draft SPG, it was mentioned that the Draft Streets Design Guide would likely come forward after the adoption of the Places to Live SPG. Whilst not relevant to this consultation process, the Draft Streets Design Guide appeared to conflict with the place making agenda and contents of this consultation document and therefore we would welcome a more cohesive approach between the Guidance.</p>		
6	<p>The opening paragraph (1.1) covers the intentions of the document; but as a development company we have been extremely concerned with regards to <b>lack of cohesion between two of the principal departments within Swansea City Council, namely the Planning Department and the Highways Departments</b>. For example, in the draft SPG there appears to be no reference to the Draft Streets Design Guide until Section F (paragraph F7) - which is currently being developed separately and in consultation with the Highways Department.</p> <p>We believe it is important to incorporate the Street Design Guide into the introduction of the draft SPG document in order to ensure “clear and consistent guidance on matters relating to Placemaking and Design for all types of residential and mixed-use development to create places to live” - as is the intention of the guide.</p> <p>In paragraphs 2.44 &amp; 2.45, which refer to Complementary SPG's, the proposed Design Guide should also be included in this section.</p> <p>In Section F – Streets as Places, it is important to include in this SPG direct correlations to the draft Street Design Guide from the Council's Highways Dept.</p>		
11	<p>The key to the success of this SPG is that other Council departments such as highways adoption fully buy into this philosophy and support the more imaginative, people-led approach being advocated. With this joined-up thinking, developers will have the clarity and consistency they need to fully commit to placemaking, knowing that there isn't a disconnect between planning and the other statutory processes for which the Council has responsibility.</p> <p>It should be a clear stated aim in the introduction, that this guidance will be accompanied by the Street Design Guide (Highways), and that all efforts will be taken by Swansea Council to align these documents and for officers to work in a joined-up way. There should be acknowledgement that the practices of the past have led to different approaches being taken to design of residential places.</p> <p>Planning officers have required a placemaking led approach upfront, but this is rarely backed up at the road adoption stage and this has watered down designs and created major problems for developers. This has left developers with two choices: agree to make the design changes required by the Highway Authority with subsequent delays and planning applications, or to not offer</p>		

	the streets/roads up for adoption. Road adoption is vital for sustainable residential places that function well and is an essential part of the Art of Placemaking. Adoption gives clarity for the long-term maintenance of streets and street lighting; refuse and recycling will be collected regularly and there will be no confusion or financial burden on future residents which can sometimes result in streets falling into disrepair where they are un-adopted.		
13	<p>Para D.11 (Section D) states that turning areas should be sensitively designed as focal public areas rather than standardised engineering solutions while the 'Principles' (p57) also states that when turning areas are required, they should not simply follow rigid geometric standards. However, historically, the S38 process has eroded elements of the approved planning drawings, and this is acknowledged in paragraph F.7, as the requirement for the highway to be able to accommodate a refuse vehicle and fire tender, to date, and overrides everything. Highways involvement at the pre-application stage, therefore, is critical as, by <b>collaborating with them from the outset</b>, there is an increased likelihood of good placemaking principles and GI being retained and not eroded due to highway concerns as a site goes through both the planning process and the S38 process.</p> <p>Section F – para F.7 states that it is important that the subsequent S38 adoption process does not unravel the place-led streets agreed at the planning stage and that the Council has a Highway Design Guide. However, the only Highway Design Guide that could be found online is dated June 2012 and so does not accord with the increased emphasis on placemaking, SuDS and GI. As a result, there will be a <b>contradiction between the current adopted Highways SPG and the new Residential Design Guide SPG</b> once adopted until a new Highway Design Guide is adopted at some point in the future given a draft is currently being worked on.</p> <p>As stated above, Highways involvement at the pre-application stage, therefore, is critical as by collaborating with them from the outset, there is an increased likelihood of good placemaking principles and GI being retained and not eroded due to highway concerns as a site goes through both the planning process and the S38 process. It is also worth noting that the highways requirements for a Stage 1 RSA for every non-standard road is onerous especially if one is required after every iteration of the layout as it goes through both the planning approval and S38 adoption processes.</p>		
11	Historically, despite Manual for Streets being in place for over a decade, <b>the primary areas of conflict between planning policy and the implementation of the Highways Act continue to persist:</b>		

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

	ultimately improve Swansea and put Swansea on the 'placemaking map'.		
5	<p>The increase in 'spec' from a placemaking and GI perspective in the City of Swansea needs to be fully tested in terms of site viability, especially on allocated sites in the LDP where such placemaking and GI provisions weren't perhaps expected or built into the viability of that site at the time.</p> <p>Assurances are needed that the increase in Placemaking and GI specification will not be at the detriment to scheme viability and perceived unfavourably if developers etc go through the significant expense of prompting a site through a planning application. Therefore, a careful balance needs to be struck to ensure a development can provide its 106 obligations where appropriate and reasonable to do so.</p>	<p>Understanding viability is integral to the placemaking approach. It is recognised that aspects such as SUDS and non-standard street designs may require increased commuted sums for maintenance.</p> <p>Therefore, developers may wish to utilise the 'open book' development viability process to ensure deliverability to inform the negotiation of section 106 planning financial contributions.</p>	<p>Add reference to open book viability process with next text in section 3:</p> <p><b><u>Delivering Places</u></b></p> <p><b><u>3.17 The Swansea LDP recognises in Policy IO 1 'Supporting Infrastructure and Planning Obligations' that an essential part of delivering sustainable development is to ensure sites are capable of being developed in terms of financial viability. In support of the policy, paragraph 2.4.10 states: 'The Council expects that the costs relating to any measures required to make the development viable and sustainable will be taken into account at an early stage of the development process (including land acquisition) in order that realistic values and costs are achieved as part of the development appraisal'. In instances where developers maintain that exceptional and/or abnormal costs relating to placemaking and other requirements have a significant effect on the viability of delivering a proposal, such costs will need to be identified and assessed by all relevant parties in an open and transparent manner using appropriate viability assessment methodologies. Further details on the use of comprehensive, viability modelling and analysis by site promoters and decision makers are available at <a href="https://www.swansea.gov.uk/dvm">https://www.swansea.gov.uk/dvm</a></u></b></p>
13	There is no reference to viability or deliverability within the SPG. However, SAB Commuted Sums are currently impacting significantly on the planning process. It is clear that SAB permission is a separate process to a planning permission but the impact of SAB does need to be considered as part of the planning process when the viability of a site is an issue. It is a financial obligation in the same way a highway commuted sum is or an education or community facilities contribution is. It should, therefore, be considered as impacting on the viability of a development in the same way.		
13	The greater emphasis on placemaking, SuDs and GI is in keeping with national policy but the impact of SAB, and commuted sums in particular, needs to be considered more.		
11	<p>Section A: Neighbourhoods. Agree with the 15-minute neighbourhood concept.</p> <p>Will this now be applied to Swansea's allocated LDP sites? Some of these sites will struggle to achieve this objective due to their size, relative distance from district centres and lack of adequate cycle/foot path infrastructure.</p> <p>Furthermore, it is usually challenging to include shops and other facilities on all but the largest strategic sites. Locating new development close to existing facilities is always preferable as a key principle of placemaking.</p>	<p>The 15 minute walkable neighbourhood concept is a recognised concept that is indeed being applied as the starting point to all allocated sites. The emphasis on active travel is also key to reduce dependence on private cars.</p> <p>In instances where it may not be possible to require facilities on site, there may be contributions sought to support active/ sustainable travel modes to access existing local and district centres.</p> <p>The standard time to walk 400m on the level is 5 minutes so C.17 needs to be amended to accord with A.5.</p>	<p>Amend A.3 to indicate that the 15 Minute neighbourhood is typically a distance of 1200m</p> <p>Amend C.17 to reference the 5 minute walk to be 400m as per A.5.</p>
14	<p>Para A.3 The aim should be to create or reinforce a 15 minute neighbourhood where residents can meet all their daily needs on foot or cycle within 15 minutes of their home.</p> <p>15 minutes is just about okay on cycle but too long for most things if on foot and most people will still get into cars. Let's go</p>	<p>Additionally, it is noted that 1200m is the typical distance walked in 15 minutes so A.2 also needs amendment</p>	



	for a shorter distance that is more achievable and then compromise backwards to 15 mins if we have to.		
6	Para C.17 references the requirement of a 300m walking distance to the nearest open space. However, this is contrary to para A.5 which states a requirement of 400m walking distance to the nearest open space. We would seek clarification on this discrepancy.		
3	Para C.17 makes reference to 300m walking distance to the nearest open space, but this is contrary to para A.5 which states 400m.		
14	Para E.13 Where the reference to 'Over 100 homes' occurs, here and elsewhere, it should be clear that it means not just the size of any development, but the combined size of the neighbourhood to which it contributes.	Paragraph A.7 sets out that development may be required to address shortfalls of provision in the existing community. However, the paragraph could be more clearly worded.	Amend paragraph A.7 as follows: Developers and applicants should engage with the Council at an early stage through the pre-application process, in order for discussions to be had on any spare capacity in relation to infrastructure or existing facilities that a proposed development could utilise, <u>or alternatively to identify deficiencies in community infrastructure that a development would be expected to make contributions towards or provide on site. Further details in relation to this process is set out in the separate Supplementary Planning Guidance relating to Planning Obligations.</u>
10	Page 16 – Government Climate Change Strategy (Transport). There should be a greater emphasis on public transport. Some funding from the development should go towards this and places for buses to pull in at bus stops should be included.	This is the case. New developments should prioritise active and sustainable travel as indicated in the Neighbourhoods Guidance Module. Where appropriate section 106 planning contributions are sought to support bus infrastructure and bus services.	No change
14	Page 38 'Key Questions' - Does the development provide for, or have good access within 400m to parks, play areas, newsagents, and within 800m to community facilities such as a school, shops, pubs or cafes? We strongly recommend access to ' <b>basic daily needs</b> ' within walking (400- 800m) distance.	This is a helpful point to add 'basic daily needs' into this paragraph which is linked to the 15 minute neighbourhood concept.	Make change to last bullet point of the Key Questions on page 38 as suggested: Does the development provide for, or have good access to parks, play areas and open spaces within 400m to parks and good access to everyday needs with 1200m as per the 15 minute neighbourhood concept?
14	Para C.18 – The 5 minute walking distance to natural open space is hopefully repeated in the context of access 'basic daily needs' (groceries and the like) and to public transport, in a subsequent section.		
3	Section B – Para. B.4 – refers to LDP Policy SD2 and the requirement to achieve a net density of 35 dwellings per/Ha. – This requirement should be relaxed when it comes to developers offering Small Plots / Self Build as in the majority of cases these small plots will be individual plots rather than semi-detached / terraced units.	These comments set out a range of different perspectives from the density requirements being too high, density requirements being too low and the need for flexibility. LDP Policy SD 2: Masterplanning Principles sets a net density target of 35 dwellings per hectare on schemes of more than 100 units. Experience of assessing and negotiating schemes indicates that this density is achievable with integral open spaces, retained trees,	Amend paragraphs B.8 –B.10 as follows: B.8 Sites in locations that are relatively more accessible and well connected to services and facilities - such as city, town and neighbourhood centres - are expected to accommodate a higher density of development. <u>Future Wales: The National Plan 2040 sets national placemaking principles including the suggestion that new developments in urban areas should aim to have</u>
6	Section B – Para. B.4: refers to LDP Policy SD2 and the requirement to achieve a net density of 35 dwellings per/Ha. We believe that, when it comes to encouraging developers to offer		

	small plots or self-build projects, this constraint should be relaxed as the majority of these projects are likely to be individual dwellings rather than terraced or semi-detached properties.	play features and sustainable drainage features provided there is a mix of home sizes on site including apartments. This is evidence in the guidance with the inclusion of a feature on the Gwynfaen Development.	<u>a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. (Future Wales p66).</u> Clearly certain parts of the urban area will be more accessible and connected to facilities, services and other uses than other
11	<p>The target of 35 dph as an optimum density for development in suburban areas is welcomed. When the density is varied within the site itself, this can result in a good sense of place, opportunities for trees and green space and a legible environment.</p> <p>Higher densities are appropriate closer to the centre of towns and cities. This requires increased story height, more imaginative solutions for garden spaces and communal spaces, reduction in parking standards and a relaxation of separation distances. These characteristics are all site specific, and solutions will need to be tailored to suit the site and the character of the surrounding context.</p> <p>Not clear if the density of 50 dwellings per hectare is applicable to the design of apartment-based schemes, or whether this includes homes with gardens. If the latter, would be concerned about garden sizes and the difficulty of separation distances for privacy etc. Car parking provision also becomes more challenging at the higher densities. There are hybrid residential schemes, such as Pobl's Townhill Campus redevelopment which have adopted creative approaches to these design challenges, and in doing so provide smaller private gardens in return for a generous provision of communal greenspace.</p>	<p>Given the 100 unit threshold the density target does not apply to smaller sites and there is an acceptance that lower densities may be appropriate in rural/ sensitive edges.</p> <p>Clause ii of policy SD 2 sets a requirement for higher densities along public transport corridors and in focal areas. The requirement for higher densities is explained in the SPG to be in accessible and central locations. This is backed up by the target in Future Wales of 50 dwellings per hectare in accessible locations. WG has confirmed that this target is not going to be appropriate in all so called urban locations, and that each site will need to be assessed as to how accessible and appropriate it is for such high density living.</p> <p>It should also be noted that the target of 50 dwellings per hectare is based on all or majority of apartments in a scheme. It is very difficult to achieve this higher density target with houses, gardens and private parking arrangements and the results are often cramped and unsuccessful places.</p> <p>City centre living could be in tall buildings or low rise blocks. Paragraph B.8 outlines that sites in accessible locations such as city, town and neighbourhood centres are expected to accommodate a higher density of development. It is accepted that the support for low rise block could be stronger with an image and additional text.</p>	<p>B.9 Sites in locations that are relatively more accessible and well connected to services and facilities - such as city, town and neighbourhood centres - are expected to accommodate a higher density of development. <u>Future Wales: The National Plan 2040 sets national placemaking principles including the suggestion that new developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. (Future Wales p66).</u> <u>Such high density living is identified in Future Wales as being capable of supporting the future economic and social success of towns and cities, including sustaining public transport and facilities and central area regeneration schemes. Clearly however such densities demand a development form that is typically not suited to more suburban, semi-rural and rural locations.</u></p> <p>B.10 <u>When designing for higher density living, proposals must consider a wide range of issues in combination, including: the surrounding settlement character; the relative accessibility and connectivity of the urban location; the standards and quality of public open space that may be required; internal space standards; private external space; potential noise disturbance, and general overarching matters relating to design quality such as appropriate separation distances. Fundamentally, achieving higher density development must not be at the expense of the character of an area or the integration of placemaking requirements, and must not give rise to adverse impacts on the health and well being of existing or future residents.</u></p> <p>Expand Fig B.3 as a full page extract of higher density town houses and urban low rise developments. Add highlight page of Coastal Urban Quarter development as example of low rise high density development including shared amenity space, commercial ground floor uses and active frontages.</p>
14	<p>Section B (Density) This section is written almost entirely with suburban development in mind. Even the, the density target is extremely low. Such densities cannot provide the footfall and vitality to sustain 'mixed use town' – perhaps some play, but not social resources, daily needs, schools etc (without dependence on motor vehicles).</p> <p>For reference, Jane Jacobs talks in terms of 3-400 units per hectare. Whilst we have little hope that current planning can even contemplate such figures for new developments, there is certainly a case for much higher figures in town. It is not 'high rise' that provides such figures (despite the current emphasis on student apartments), it is 'row housing', terraces, what used to be 3 &amp; 4 storey 'walk-ups', now apartment terraces. There are very few in Swansea Centre – Castle Buildings, Pearl House. The policy would benefit from a developed section on city centre apartments rather than leave it 'suburban loaded' and 'city high rise assumption' as now. Page 38 alludes to this but without conviction.</p>		

14	Para B.10 The opening sentence invites exceptions, “Some sites also have the potential to deliver mixed use schemes...”. Are we committed to 2.20 first para or not?	<p>Paragraph 2.20 summarises Future Wales including the strategic objective for a mix of uses but this does not mean that every site is expected to be mixed use.</p> <p>Sites of all sizes in city and town centre locations may include mixed uses whilst paragraph B.10 recognises that larger sites of 100 dwellings or more should include mixed uses as per LDP Policy SD2: Masterplanning principles.</p> <p>Therefore, there are opportunities for mixed uses at all scales of development, but this cannot be required for all sites.</p>	No change
14	B12. Do any of the new (highrise) developments in the city centre incorporate balconies or Juliette balconies?	<p>Many of the taller residential buildings in Swansea do incorporate balconies or Juliette balconies such as the Meridian Quay Tower and Urban Village.</p> <p>The concern is that many of the smaller scale conversions are substandard in terms of floor space and amenity which has implications for the well-being of residents and the cohesiveness of the community so this aspect is being given greater emphasis in the updated document.</p>	No change.
14	B14. None of the current student accommodations meet the above criteria nor the principles in B14. Why are we emphasising Student accommodation? There is little evidence that contributing to vibrant ‘mixed use city’ and ‘placemaking’ applies to any of the current developments. (Mariner Street, on that key site by the station with erstwhile high density apartments (pre 90s) is yet to be revealed).	<p>Disagree, all recent propose built student accommodation developments are within Swansea Central Area and will help repopulate the city centre.</p> <p>A separate SPG exists for Purpose Built Student Accommodation and this section provides a cross reference to another form of higher density living . addressed by separate SPG for PBSA</p>	No change
14	In the ‘Principle’s (pg 41) it is suggested that more emphasis is placed on the city centre (if we believe in a residentially populated centre, for social and economic sustainability). Leading on suburban principles is the wrong emphasis if we believe in mixed use town (as against greenfield remote sites). What might ‘higher densities’ be? Why is there an immediate caveat? (Cramped living environment). Why say bullet point 5?	<p>Whilst it is important to encourage higher densities in accessible and central locations this should not be at the expense of the well-being of residents, hence the caveat regarding avoiding a cramped living environment.</p> <p>In response to the comments on density, the Future Wales target of 50 dwellings per hectare has been added to paragraph B.8 indicate the what the higher density could be.</p>	<p>Add new Principle to end of module B:  <u>In higher density developments, there should be sufficient good quality private and shared amenity space such as private balconies, communal gardens and welcoming entrances.</u></p> <p>Add corresponding Key Question:  <u>For higher density developments, is there adequate private and shared amenity space?</u></p>
14	For town centres (and suburbs) is there going to be anything said about the visual and physical activity of buildings at ground level ‘talking to the street’ - doors and windows - especially in the city centre? The assumption of high rise omits the concern re the vitality and personal safety and comfort of adjoining streets and spaces.	<p>Where uses are mixed within buildings such as commercial space on the ground floor with residential above then the expectation is the creation or enhancement of active and vibrant street level frontages.</p> <p>Paragraph B.10 does set out guidance for mixed use sites but this does not address mixed use buildings so a new paragraph is needed.</p>	<p>Add a new paragraph after B.10 (renumbered to B.11) as follows:  <u>B.12 Where uses are mixed within buildings, such as commercial space on the ground floor with residential above, then developments will be expected to create or enhance active street level frontages that have high levels of visual transparency. Such developments should also incorporate legible and safe entrances to upper floor homes.</u></p> <p>Add highlight page of Coastal Urban Quarter development as example of low rise high density development including</p>

			shared amenity space, commercial ground floor uses and active frontages.
11	<p>Section B. Mix of Uses (Strategic Placemaking Principles). A mix of other uses as part of residential development is an important and effective way to achieve vibrant and sustainable places. Uses such as retail, leisure, commercial and community facilities embedded as part of residential development can provide a community focus and enable people to work and shop closer to home.</p> <p>Large residential developments (over 250 homes) without any other uses can become soulless and a culture of car dependency can set in. This is less possible on smaller developments of 10-100 homes where the question of financial viability may prevent such facilities being delivered for commercial reasons. Therefore, whilst this idea should be encouraged, some pragmatism needs to be exercised in the application when it comes to financial viability.</p> <p>Another idea to nurture other uses within residential developments is to allow for flexible consents on homes at key locations (corners) or key streets (main route through) where the ground floor of homes can be converted into small scale retail or commercial uses. Many people are now used to working from home and may wish to do so in the future. Such ideas can be explored at masterplan stage, and it will be up to purchasers to exploit this opportunity subject to some degree of control by the planning authority.</p>	<p>This comment notes the wider opportunities for larger sites as set out in the current guidance.</p> <p>Paragraph B.10 recognises that larger sites of 100 dwellings or more should include mixed uses as per LDP Policy SD2: Masterplanning principles.</p> <p>Sites of all sizes in city and town centre locations may include mixed uses.</p> <p>Therefore, there are opportunities for mixed uses at all scales of development but this cannot be required for all sites.</p> <p>The opportunity for future flexibility especially corner plots is a helpful suggestion that can be taken on board. This is difficult to do via 'flexible consents' but developers can be encouraged to design flexible corner buildings with higher floor to ceiling heights etc that can accommodate future conversions.</p> <p>The scope for local co-working space is evolving and most logically in the local and district centres.</p> <p>The proposed updated space standards (see separate comments) and proposed allowance for 25% of homes to have gardens large enough for home offices allows options for home working</p>	<p>Add new sentence to end of paragraph B.10 (renumbered as B.11) as follows:</p> <p><u>Corner plots on key routes in new developments should be designed flexibly to allow for possible future change of use.</u></p>
11	<p>Section B Conversion of unused buildings into residential accommodation (usually flats) is a tried and tested way of breathing back life into town and city centres. It is also inherently sustainable as it avoids the destruction of older buildings which can have a negative effect on decarbonisation. However, it is often very difficult to economically convert older buildings (even those buildings from recent decades) to provide accommodation which meets environmental performance standards such as SAP and EPC.</p> <p>Therefore, some caution must be exercised to ensure that purchasers and tenants of converted buildings don't end up in fuel poverty, especially as we move away from gas to electricity which is currently much more expensive per Kilowatt Hour. The local planning authority should therefore welcome the introduction of renewable energy solutions as part of the architectural landscape of our towns and cities, as a by-product of converting older buildings. However, renewable technologies will need to be integrated in a thoughtful way that does not blight the townscape.</p>	<p>Section I.5 acknowledges that buildings will look different with the integration of low carbon technologies as follows:</p> <p><i>"With a move towards lower energy lifestyles this will change the way homes look; this is an opportunity for contemporary design in neighbourhood locations utilising modern materials and innovative architecture. "</i></p> <p>The principles in Section I also state:</p> <p><i>"Ensure that water efficiency, low energy and micro generation features such as photo voltaic panels, solar thermal panels, battery storage, electric vehicle charging points, recycling storage, water butts and rain gardens etc. are positively integrated into the overall design as part of an integrated design approach. "</i></p>	No Change



4	<p>The Webinar question and answer question session indicated the following:</p> <p>Sustainable Drainage features represent placemaking and well being opportunities but implementation issues being experienced.</p> <p>Developers welcomed positive engagement of Drainage Officer via the pre-application process.</p> <p>Understanding commuted sums for maintenance of SUDs features is important for viability.</p>	<p>Sustainable Drainage is a mandatory requirement alongside the planning process. This has a separate consenting regime via the Sustainable Drainage Approval Body known as SAB.</p> <p>The interaction of SUDs features with street design and adoption is being understood via recent planning application negotiations and the SPG sets out helpful guidance for developers based on this learning. For example there has been a focus on whether street trees can be planted in SUDs features as part of the multi functional Green Infrastructure. Trees planted in SUDs features can cause issues of roots blocking pipes or trees having to be removed when filter mediums need to be replaced. Therefore on a number of sites a side by side approach has been developed with the street trees alongside and separated from SUDs features as green infrastructure build outs into the carriageway and this can be updated into the SPG.</p>	<p>Officers will continue to work collaboratively to ensure SUDs and Placemaking are considered holistically in the planning and SAB process.</p> <p>Add image of green roof and green wall in relation to paragraph C.10</p> <p>Add feature box after paragraph C.15 explaining how street trees can be separate alongside SUDs features as Green Infrastructure buildouts into carriageways.</p>
11	<p>The integration of GI and SuDS into residential development is a recent requirement and a most welcome aspect of Placemaking that adds value and benefits biodiversity, health, and wellbeing. As with other key themes that cut across different departments within the local authority, there are some conflicts emerging between the approach favoured by the planning authority and the approach preferred by the Council as adopting authority for Highways and SUDs.</p> <p>Developers want to include green infrastructure, but this is often not supported by the highway authority's adoptions team. This SPG presents the ideal opportunity to resolve these conflicts by ensuring that the placemaking approach is fully endorsed by the highways and drainage functions of Swansea Council.</p> <p>Developers need a predictable and consistent approach on aspects such as SUDs features and how these integrate with placemaking and highways. The content of the SPG just mirrors the SAB guidance so is fairly acceptable and not controversial. However, it's the implementation of the SUDs and the coordination with Drainage and Highways that often presents a challenge for the development process. The process itself needs to be made clear and consistent to avoid ambiguity and frustrations in getting projects off the ground. In addition, the commuted sums and subsequent management of the sustainable drainage and how this relates to the management of the wider green infrastructure also causes problems in relation to viability of projects and ongoing management.</p> <p>The SPG is an opportunity to provide the clarity that is necessary. The SPG states that "Larger sites may need a series of attenuation basins as smaller landscape features rather than a single large one at end of system." This preference for several small ponds over one large pond is too prescriptive. For example, Pobl and Coastal followed this approach on Gwynfaen which is considered as a good scheme in terms of Placemaking.</p> <p>The SPG should include reference to the benefits of Green Roofs and Walls, which include improved air quality, biodiversity gains, mitigation of urban overheating, urban gardening, and acting as a SUDs feature where space is limited. Whilst we wouldn't advocate such features becoming mandatory, the</p>	<p>Further detailed guidance on SUDs will be provided by the forthcoming Street Design Adoption Guide which will explain how the SUDs features can be incorporated alongside the adoptable highway areas.</p> <p>The comment regarding size of attenuation basins relates to paragraph C.15, this states, "Larger sites may need a series of attenuation basins as smaller landscape features rather than a single large one at end of system", this is not prescriptive but does reflect current experience across a number of sites.</p> <p>Green walls and green roof are referenced in paragraph C.10 in terms of 'source control' features and this could be emphasised by suitable images.</p>	

	Placemaking SPG needs to include some principles and key questions on Green Roofs and Walls.		
13	<p>Para C7 specifies attenuation basins at the landscape scale, swales at the neighbourhood scale and local street scale and rain gardens at the local plot scale. This is too prescriptive and there is always a risk when creating prescriptive guidance that it will become obsolete as not all sites will be able to provide these due, for example, to the topography of the site and so the inclusion of it, therefore, could be misleading.</p> <p>A careful balance needs to be achieved between advocacy and guidance vs control and restriction, e.g placemaking including SUDs should be based around more useful high-level themes with broad example “Do’s and Don’ts” instead of “should and could” points. The SPG should state that sites will be required to provide blue &amp; green infrastructure but that the solutions will be site specific having considered the landscape, neighbourhood, local and plot scale hierarchy triangle on page 42.</p>	<p>Sustainable Drainage is a mandatory requirement alongside the planning process.</p> <p>Paragraph C.7 suggests how the SUDs features could correspond with the landscape, neighbourhood and street scales of Green Infrastructure. This is not prescriptive and whilst the SUDs strategy for a site will be bespoke it should form part of the placemaking approach.</p>	No change
14	<p>Para C.3 - Is the use of the word ‘should’ here (and throughout the document) appropriate? In this para, and elsewhere, suggest change ‘should’ to ‘shall’?</p> <p>There appears to be a tendency to use ‘green’ language without the authority to enforce.</p> <p>We also suggest that the section on Green Infrastructure precedes that on SUDS, to show importance and conviction.</p>	<p>The document is supplementary planning guidance and the word is appropriate as guidance.</p> <p>It is logical to swap the order of this section so that Green Infrastructure which is more strategic comes before SUDs.</p>	Switch order of Green Infrastructure paragraphs to come before SUDs: move paragraphs C.16-C.21 and associated ‘Example GI Strategy Framework’ to come after paragraph C.4.
14	A statement would be appropriate to the effect that ‘the presumption is that trees are not to be removed for future developments. The assumption is that design and layout shall take existing trees into account.’	<p>Paragraph C.3 emphasises the starting point to work with the existing environment on site.</p> <p>There is a separate Trees, Hedgerows and Woodland SPG which states that the Council expects all category A and B trees to be retained and integrated to layout proposals wherever possible (paragraph 3.12).</p> <p>Where trees are proposed to be removed there is a tree replacement standard as transparent basis for agreeing multiples of replacement trees for each mature tree felled.</p>	<p>Add new paragraph after C.3 to set out cross reference to Trees and Development SPG Tree Replacement Standard as follows:</p> <p><u>C.4 This section should also be read in conjunction with the separate Trees, Hedgerows and Woodland SPG which sets out the expectation that all category A and B trees will be retained and integrated into layout proposals where possible. This SPG also sets out a clear and transparent criteria for determining the number of replacement trees required for those proposed to be removed. This is based on mitigating loss of canopy cover not simply the number of trees lost. Replacement trees are expected to be large growing species for immediate presence and robustness.</u></p>
10	Page 19 – Creating Healthier Places and Spaces. There should be an increase in allotments in all areas of Swansea.	Section E paragraph 9 specifically encourages the provision of allotments and scope for local food	No change

		production in new places and this carried through to the principles on page 63.	
14	Bullet points 2 & 3 of 'Principles' (pg 50) are full of loopholes. Bullet 2 - suggest 'Maintain and enhance the existing natural environment, biodiversity ...' etc Bullet 3 - delete 'protected' and 'designated' and replace 'protected' with 'existing'	The SPG is guidance that explains how national and local policy should be applied to new places to live at all scales. Therefore this wording and the wording throughout the document is appropriate.	No change
12	<b>New homes should be close to schools, shops, parks and nature</b> (from conversations with children and families at the play sessions). This was a strong message from children and their parents/ carers about the benefits of being able to walk to community facilities with benefits for health, well being and sense of community.	This aligns with the national emphasis on active travel and there was a clear view that having to drive everywhere was not a good thing. The document sets out these requirements and this is a positive endorsement of this approach.	No change
11	Section D: Making the Connections. Residential developments need to connect to the surrounding neighbourhood via a permeable network of streets and paths. Making the connections so that developments don't end up as cul-de-sacs served by one vehicular/pedestrian access is vitally important to placemaking. It can unfortunately become one of the most challenging and controversial objectives to achieve due to local opposition to multiple street access points, accusations of creating 'rat runs', ransom strips preventing connections, and other site constraints.  The local planning authority and developers should strive for optimum connectivity but be prepared to be pragmatic and flexible if this cannot be achieved. There are however situations where the desire for street connections conflict with the concept of Community Safety or 'Secured by Design'. Secured by design is a key requirement of the Welsh Government's WDQR 2021. Such conflicts can occur where introducing a connection would be detrimental to security and safety.  A connection that enables opportunities for crime whether to property (e.g., car theft or vandalism) or the person should be avoided. Connections need to be well overlooked – if they cannot be well overlooked this would bring into question the wisdom of having a connection. This is often the case with pedestrian connections at the end of cul-de-sacs or into a semi-private apartment development – where they should be avoided.	The need for safe and convenient permeability is addressed in guidance module D: Making Connections.  The emphasis is on well overlooked and connected low speed streets. Where cul de sacs are unavoidable there should where possible be safe and direct pedestrian links.	No change
14	Section E - Public Spaces. It is not the only case (E.1) that "Public spaces <b>should (?)</b> be designed as part of the 'Green Infrastructure' of a site....". We suggest that this section is led with notes on streets and squares, then deal with parks and local greens.  The concept of 'overlooking' and 'natural supervision', should be incorporated here. [it is in the principles, further down but merits greater status, especially for urban spaces, squares, seating etc.]	Agreed amend para E1  The text in E.13 links to LDP Policy SD 2 Masterplanning Principles and addresses phased delivery of infrastructure on larger/ strategic sites.	Amend third sentence of paragraph E.1 as follows: "Public spaces <u>are key parts of the multifunctional 'Green Infrastructure' of a site.</u> They should be welcoming, well overlooked, comfortable ....."

14	Section F - Streets as Places, para F.3. How about: "Grass verges <b>are not a sufficient</b> green street feature."	Agreed, grass verges are part of the green concept but not sufficient in their own right.	Amend last two sentence of paragraph F.3 as follows: <u>Grass verges alone are not a sufficient green street feature. Consideration should be given to the scale of adjoining buildings, the potential dominance of vehicles in the street scene, and biodiversity requirements to design meaningful green streets, which will typically require street trees at appropriate intervals, supplemented by suitable low level planting.</u>
14	Also on page 66, the assumption of 2 storey housing for 'primary and secondary streets' is inappropriate, demonstrating a focus on suburban estates. In our city, there are many examples of 3 & 4 storey terraced homes (mostly 19 <sup>th</sup> and early 20 <sup>th</sup> century), whose streets, places and squares merit the criteria offered (i.e. Uplands)	The text with the street sections says 'typical characteristics' and the primary and secondary street indicative section does show the outline of a 3 storey house with top floor in the roof space. Therefore, the wording could be amended to be clearer	Amend Primary and Secondary Street text as follows: Typical Characteristics: <u>2-3 storey</u> houses fronted by front gardens, design speed up to 20 mph. Primary street verges and trees to both sides. Secondary streets verges and street trees to one side one side.
14	F12. Why show Fig F 7 if the intention (elsewhere) is to discourage cul-de-sacs?	Section F.12 indicates that the guidance encourages connected slow speed streets but where this is not possible such as smaller sites the cul de sacs are acceptable. Fig 7 demonstrates how cul de sacs should be designed as places where they are unavoidable	No change
14	F13 Reads as if written by a highway engineer. Start with 'people space', examples of 'home zones', post pandemic examples of parklets, outdoor social and commercial activity, more emphasis on shared streets. Use your Kingsway example and others.	The Streets as Places guidance module has been subject to positive inputs from highway colleagues and this paragraph includes important practical information such as the need for drainage etc, however yes the start of F13 could be amended and the quote updated to emphasise the recent statement in Building Better Place regarding the need for active and social streets.	Amend start of F.13 as follows: As advocated in Planning Policy Wales (ed10), in many new developments there will likely be opportunities for <u>place led people orientated streets that are designed for low vehicle speeds</u> to integrate socialising ... Amend quote after F.1 as follows: "With exercise and social contact so vital to our health and well-being, the pandemic has reinforced the need for well-designed, people orientated streets. This forms the basis of the 'active and social streets' policy in PPW, which is supported by Manual for Streets6 and its companion guide Manual for Streets 27. PPW is clear that the design of streets should be based on urban design principles and not the conventional engineering-led approach in the now superseded Design Bulletin 32" (Building Better Places, P17)
14	Section G Accessible Places - Does this section include city centre streets and spaces? May be useful to state that under the 'Objective' - it currently implies (states) 'residential environments'.  In G5, there is an assumption that 'carriageways' are separate areas, with crossings perhaps best served by raised level crossings. We support this of course. There is a case for more elaborate and visible shared surface areas, with limited signage, surface changes, planters, give-ways etc, that clearly indicate that drivers are the secondary concern and should drive slowly with extreme care, such as Ben Hamilton Baillie's Poynton, our	The objective of accessible places applies in all locations beyond residential environments,	Amend Section G Objective as follows: To create inclusive <u>streets, spaces and buildings</u> which maximise mobility and foster a sense of independence for all people.



	Uplands proposal and, to some extent, Kingsway and Oxford Street.		
11	The application of Lifetime Homes principles to the design of all new homes is supported but we have found this, in reality, to be challenging to achieve. As with other standards that apply to grant funded homes, it is likely that most private developers will not embrace these principles. Therefore, we question the status of this within the document – is it advisory drawing attention to best practice?	The SPG is guidance and does not require all new homes to be life time homes. It does emphasise that inclusive environments are important in terms of streets, public realm and homes.  This issue appears to relate to the inclusion of the lifetime homes graphic and no mention of this concept in the text.	Remove lifetime homes graphic from Section G and remove Key Question regarding lifetime homes.
3	Section G – Accessible Places. We are extremely concerned to note the requirements as set out in Para's G.10 – G.15 which if applied across the board to all new residential dwellings will have a major impact upon site viability and marketability to the wider public. The internal design and specification for new dwellings is governed by the technical standards set out via the Building Regulations and is therefore, totally unacceptable for the Local Planning Authority (LPA) to impose the inclusion of additional items such as 'Homes for the Blind / Homes for the Deaf' within each and every dwelling.  Whilst we appreciate the contents of Paras. G.10 – G.15 could be regarded as a 'wish list' on behalf the LPA, it could be construed as a 'restraining order' by developers, who will not be prepared to incorporate these additional internal specification items within their standard build specifications. Accordingly, we would request that the SPG is amended to exclude the 'wish list' set out in the above paragraphs in order to prevent over burdening and interference with developers' internal build specifications and marketability of dwellings (which are not matters for regulation by the LPA).	This section is unchanged from the adopted 2014 Residential Design Guidance.  The accessibility of homes is addressed by Part M of the Building Regulations as indicated in paragraph G.9.  The SPG cannot require provision beyond Building Regulations but can for greater awareness outline the considerations for designing more accessible homes and this can be clarified by amending the end of paragraph G.9.	Amend last sentence of paragraph G.9 as follows:  The requirement for providing accessible homes is set out in Part M of the current Building Regulations. <u>This SPG cannot require provision beyond what is required in the Building Regulations, however the following section provides an overview of the considerations in designing more accessible homes.</u>
6	Site viability and marketing to the wider public would be negatively impacted if the requirements in Paragraphs G.10 – G.15. were applied to all new residential dwellings. The internal design and specification for new dwellings comes under the technical standards of Building Regulations and so we fail to see how the Local Planning Authority can include further requirements like 'Homes for the Blind' or 'Homes for the Deaf' for every dwelling?  We do understand that the above-mentioned paragraphs (G.10 – G.15) could be viewed as a 'wish list' by the LPA, but from developers' perspective, these paragraphs, it could be interpreted as a type of 'restraint'. This in turn could result in developers not being prepared to include the outlined internal specifications within their standard build specification. To address this potential issue, we are asking that the proposed SPG excludes the so called 'wish list' in the above-mentioned paragraphs to avoid causing problems when it comes to the internal build specifications by developer. This is particularly		

	important as internal build specifications are not regulated by the LPA.		
12	<b>New homes should have larger windows and be colourful</b> (from conversations children and families at the play sessions). This was a strong message from the adults of the future of what new homes could be like to live in. Larger windows for natural light and connection to the outdoors are key aspects contributing to well-being. Colour is also important for a sense of variety and personalisation.	The document sets out these requirements and this is a positive endorsement of this approach.	No Change to text but include photos of the houses made by the children
13	<p>Section H: Townscape. Para H.4 discusses key frontages and uses a picture of St Modwen Homes' development at Locking Parklands to illustrate how they can have placemaking emphasis. The wording of H4 goes on to say that on <b>larger sites of 50 or more home there is a further requirement for key frontages to be uplifted</b>. However, this is too prescriptive and assumes that standard elevations are not of a high enough quality to be accepted without additional uplift regardless of the context of a development.</p> <p>Furthermore, as well as considering elevations within the context of a development, elevations across a development need to be considered holistically otherwise it might result in a development where the uplifted elevations are the 'nice' houses while all others are seen as sub-standard. In addition, if standard elevations are already 'uplifted' then there is little/no scope for additional uplifting and so the wording of the SPG should be amended to allow a suitable degree of variety and flexibility where this would be justified as well as clarify that the DAS should be used to explain the rationale behind the elevations chosen.</p>	<p>If developers consider that their homes are already uplifted then this can be communicated via the Design and Access Statement and explored via the placemaking negotiations.</p> <p>However, the reality is that many new developments lack distinctiveness and key areas in the layouts are missed opportunities for uplifted designs.</p> <p>This approach has been successfully applied to recent negotiations on strategic development sites with volume house builders.</p> <p>Examples of possible uplift townscape treatments are given in paragraph H.4 with building detail/ material uplifts outlined in paragraph 1.9. These are not prescriptive requirements and can be designed on a site by site basis.</p> <p>Therefore, this requirement is valid for developments of 50 or more homes but it is considered appropriate to remove the requirement for a minimum of 20% bespoke uplifted elevations to allow flexibility to negotiate these treatments on individual sites.</p>	<p>Amend paragraph I.2 as follows:</p> <p><u>Certain developments in the past have unfortunately delivered 'placeless' estates that lack quality or any sense of identity or distinctiveness, and could be anywhere in Wales or the rest of the UK. Furthermore, many larger sites historically placed insufficient emphasis on key frontages and key spaces within the development, with the result being that all parts of a newly created place appears the same. New proposals will be required to sufficiently address requirements for achieving quality, character and identity, and standardised 'anywhere developments' will not be acceptable.</u></p> <p>Amend paragraph I.9 as follows:</p> <p><u>This hierarchy must be reinforced by suitably uplifted and/or bespoke elevations to introduce variety and distinctiveness in certain areas, such as key streets, corners, junctions and facing onto key public spaces. The precise requirements for uplifted and/or bespoke elevations will be negotiated on a site by site basis having regard to the specific scheme characteristics and range of house types proposed. The number and extent of uplifted and/or bespoke elevations will need to be sufficient to make a meaningful impact on the streetscene and to views across the development. Certain development proposals may include particularly high quality materials and design attributes as part of the 'standard' house type proposed, and in such instances the requirements for additional uplifts may not apply. Suitable uplift treatments will depend on the architectural approach and could, for example, include higher quality materials, additional architectural features such as gables, bay windows, entrance porches/canopies and quality boundaries. This will be in addition to a suitably high standard of design that will be required more generally across the development.</u></p> <p>Amend caption L.3 as follows:</p> <p><u>Fig L.3 On sites of 50+ homes there will be a requirement</u></p>
13	<p>Section I: Quality &amp; Character. Para I9 states that a <b>minimum of 20% bespoke uplifted</b> elevations are expected with more as necessary on sites comprising 50 or more homes. This is too prescriptive and assumes that standard elevations are not of a high enough quality to be accepted without additional uplift regardless of the context of a development.</p> <p>It could also potentially lead to the downgrading of 80% of elevations across the site in order to achieve the 20% uplift using standard elevations as they are now seen as uplifted. As a result, the inclusion of a number, in this case 20%, is arbitrary. The uplifting is required in key areas across sites specified in the SPG as key streets, corners, junctions and facing onto key public spaces and as this is specified in paragraph I9 there is no need to specify a percentage as the requirement for uplifted elevations will then be done within the context of a development and not simply to achieve a number.</p> <p>Paragraph I10 states that, in addition to the uplifted elevations, on sites of 100 or more homes it is expected that character areas will be defined to differentiate parts of the place and that this could encompass differing styles, materials or details. The</p>		

	addition of boundary treatments should be considered for inclusion in this paragraph as they can easily be adapted depending on location, i.e. spine road, primary/secondary/tertiary street or shared private drive.		<u>for uplifted and/or bespoke elevations.</u>
15	<p>Section I.9 relates to the uplift in elevational design. The draft SPG requires a minimum of 20% bespoke elevational uplift treatments on sites comprising of more than 50 dwellings.</p> <p>PHWW do not object to this section of the document however would like to ensure that this section allows flexibility dependent on an individual development and the elevational treatments which constitute an uplift.</p> <p>PHWW considers that it is important to support modular homes due to the sustainability credentials behind such builds in regard to waste reduction, energy and quality. As referenced in paragraph I.6, in relation to MMC and uplift requirements, such builds can utilise uplifts with regards to materials, details etc to ensure the proposals reflect the character of the locality however the requirement to alter openings of such builds would not be supported.</p>		
14	<p>Section I – significant overlap with Sections F, G and H.</p> <p>This section includes valuable points for discussion. Would they be more accessible if simplified?</p>	<p>The guidance modules have been written to be read together whilst allowing consideration of new places in a strategic manner:</p> <p>F: Streets as Places</p> <p>G: Inclusive Places</p> <p>H: Townscape</p> <p>It is not appropriate to combine these or simplify and this structure has not been an issue to date in the 2014 guidance.</p>	No change
14	<p>Section H - There appears to be considerable overlap (with F &amp; G)</p> <p>Although headed 'Townscape', the images tend towards suburban (greenfield) developments (Fig H.2, H.5, perhaps H.4)</p> <p>H.4 Why must "key frontages be differentiated from the general or background buildings"? And why must they be "designed as a composition". By chance, a recent observed street in Brussels covers that point well (image submitted with comments).</p> <p>Para H.6 is very welcome. There is a need for more applied planning controls to pursue this policy and this could be reflected in the document (The overwhelming number of recent city centre developments do not comply with this criterion).</p> <p>Para H.7 All the emphasis is on 'tall building' which has separate guidance. The aspirational criteria of 'streetscene, microclimate and wider skyline/ visual impact' are extremely difficult to achieve with high rise. Jane Jacobs' Manhattan, despite its highrise image, is at its best (for both streetscape and density)</p>	<p>The guidance modules F: Streets and Places, G: Accessible Places and H: Townscape have been drafted to be read together addressing different aspects of placemaking. This structure has been use in the 2014 design guidance and works well.</p> <p>The guidance relates to all locations urban and suburban. It is accepted that more urban images could be included such as the recent Urban Quarter on Swansea High Street which reintroduces high quality townscape to a gap site.</p> <p>In Swansea City Centre, many new developments are of three stories or more as per paragraph H.6.</p> <p>A new paragraph is being added after B.10 to address active street frontages in mixed use buildings and paragraph B.11 is proposed to be amended to address 'low rise' higher density developments in town and city centre locations.</p>	Add highlight page of Urban Quarter development on Swansea High Street as example of low rise high density development including shared amenity space, commercial ground floor uses and active frontages.

	<p>with 4, 5 and 6 story 'row housing'. We can provide more images and text on this.</p> <p>There is much valuable material here, worthy of discussion. We fear there is too much, perhaps too prescriptive. There is not enough emphasis here on active and continuous frontages, particularly at street level, and visually from building heights with 'a beginning, a middle and an end'</p>		
14	<p>Section I, J &amp; K refer to 'perimeter blocks', it may be of value to define them, especially as you discuss backs, corners and sides.</p> <p>The Marina is full of confused perimeter blocks, with no definition of public and private space, and with a resultant, architecturally tragic, lack of frontage to the main street (Trawler Road).</p> <p>Your images are rather good at demonstrating perimeter blocks as having an "unbroken (frontage) boundary between public and private space" (as a principled starting point).</p>	Paragraph K.6 and Fig K.3 provide a definition and graphic of perimeter blocks.	No change
4	<p>The Webinar question and answer question session indicated the following:</p> <p>The requirement for space standards will create issues for the affordability of private homes.</p> <p>The housing industry is currently facing multiple issues – SUDs, Building Regs, Brexit and to add space standards on top will make sites unviable.</p> <p>Housing Associations must build affordable homes to the DQR standards but private market homes are built to a DQR lite approach.</p> <p>It was suggested that some Councils require a percentage compliance with the Nationally Described Spaces Standard (NDSS).</p> <p>Suggest amending the SPG to explain how the standards will be applied in Swansea.</p>	<p>The space standards in relation to paragraph K.10 and Fig K.5 on page 92 has generated significant amount of comments in relation to the implications for affordability, density and viability.</p> <p>The comments are understood however there remains a requirement to make clear what is required for space standards in relation to LDP policy PS2 Placemaking and Place Management.</p> <p>It is not considered appropriate to remove the space standards from the SPG nor to substitute a vague reference to avoiding unacceptably small homes which is not helpful to developers or decision makers.</p> <p>It is therefore considered appropriate to maintain the reference to factual space standards information at the UK level in terms of the NDSS and to bring in references to the recently updated Wales Development Quality Requirements 2021 (WDQR 2021).</p> <p>With regard to the WDQR launch it was indicated that the Welsh Government has aspirations for all homes to comply to its standards by 2025.</p> <p>To address the development industry concerns it is proposed to move the NDSS and WDQR to an appendix and to amend the wording of paragraph K.10 to indicate that the factual space standards are a starting point for consideration. This brings in flexibility of application and scope for developers to justify the size of homes proposed.</p> <p>If there is a house type that falls below the space standards then the amended wording would require the room/ furniture layout to be shown to confirm if a</p>	<p>Move Fig K.5 Nationally Described Space Standards (NDSS) to a new appendix and add recently updated Welsh Development Quality Requirements 2021 (WDQR 2021) as the factual published space standards for UK and Wales.</p> <p>Delete Paragraphs K.10 and K.11 and replace with the following:</p> <p><u>K.10 The quality and configuration of proposed internal living environments have a direct bearing on how homes support different lifestyles and the various needs of occupants, and can also have a significant effect on peoples well-being. These are important elements of placemaking to be considered alongside matters such as the outside amenity space that is proposed, and the wider provision of public open space in an area. Homes must have a convenient and comfortable layout for everyday living, with adequate storage and space to move about without feeling cramped and/or restricted when undertaking daily tasks and duties, including working from home.</u></p> <p><u>K.11 There are internal space standards published by UK and Welsh Government's, which apply to different tenures and types of housing development (see Appendix A). Proposals for new homes and residential conversions of existing buildings will be assessed having regard to the standards that exist, in order to assist in the consideration of whether living environments proposed for both open market and affordable homes are acceptable.</u></p> <p><u>K.12 Where new homes proposed fall below published space standards, applicants must clearly demonstrate</u></p>
15	<p>Section K.10 relates to Space inside of homes and proposes an update to the minimum space standards detailing that new dwellings will be assessed against the floorspace table (fig K.5) which are the Nationally Described Spaces Standard (NDSS). This requirement is for both market and affordable homes. Persimmon Homes West Wales do not support the inclusion of this requirement within the SPG.</p> <p>The minimum space standard for open market dwellings will significantly affect the affordability of units across development schemes in Swansea. Persimmon Homes pride ourselves on providing new homes for all, whether it be via affordable housing, first time buyers or those who wish to buy larger detached properties. We work provide residential development which caters for all people aspiring to own or rent their own home, whether it be through affordable homes or those sold on</p>		



	<p>the open market. We consider it important to help meet the aspirations of as many people as possible, and help those who want to get onto the property ladder.</p> <p>The inclusion of the NDSS will affect the property prices of all dwellings however will have the most significant effect on smaller open market properties within development schemes and predominantly affect the affordability of these homes for first time buyers. We all aspire to create truly mixed communities and when it comes to open market units, the market will always dictate house prices, and whilst design and location will also be key factors, size is a fundamental driver for market value.</p> <p>We also consider that these requirements will affect the overall viability of a residential development, increasing the costs associated to each plot and reducing the number of dwellings within the net developable area. Welsh Government's 'Welsh Development Quality Requirements 2021 –Creating Beautiful Homes and Places' details a space standard for Affordable Homes across Wales. This standard is due to be released shortly and will therefore provide an update position in relation to National Space Standards for affordable dwellings in Wales. It is therefore considered that a Space Standard for Open Market dwellings should not be a requirement of the Supplementary Planning Guidance as our developments across the region have demonstrated not only a market, but also a need for smaller open market units across South Wales. To increase the sizes of such properties would exclude people from the property market.</p>	<p>comfortable living environment taking into account affordability.</p>	<p><u>why the particular house type proposed is considered appropriate in the context of the wider scheme proposed, and that it will provide suitable living environments having regard to peoples requirements for daily living and the wider needs of future occupants. Floor plans should be provided to illustrate, for example, potential furniture layouts and circulation areas. This analysis and justification can be provided in a submitted Design and Access Statement.</u></p> <p><u>K.13 The Council will take a flexible and pragmatic approach to considering the suitability on certain housetypes that fall below the published standards, where these form part of a wider scheme that otherwise meets the standard requirements. Such an approach will not permit unacceptably small or unusable living arrangements will be supported.</u></p> <p><u>K.14 Where space standards are published and/or updated by the Welsh Government in the future and identified as being applicable to all homes, such standards will be used as the appropriate basis for assessment of the acceptability of the proposed internal living environments on all developments.</u></p>
1	<p>In relation to Section K.10 of the draft consultation SPG, which states that proposals for new homes and residential conversions of existing buildings will be assessed against the floor space table (fig K.5) which are the Nationally Described Space Standard (NDSS) (2015). These evidence based space standards are valid for all developments and not just for affordable homes. These standards supplement LDP policy PS2 (Placemaking and Place Management (and its expanded text). Where the NDSS standards have been updated and/or new Welsh Government standards published pertaining to all new homes, new developments will be required to meet the national standards as set out in the relevant publication. It is unclear why the LPA is proposing to introduce 'Nationally Described Space Standards' when NDSS applies in England only and Wales has its own standards set out in DQR.</p> <p><b>It is considered that this reference and table should be removed from the document as it is an English space standard which does not apply in Wales.</b> Inclusion of this does not comply with the requirement for the content of an SPG as advised in the Welsh Government Development Plans Manual (March, 2020) which states clearly that SPG must be consistent with the plan and with national planning policy. BDW therefore objects to the proposed inclusion of NDSS for all residential development in Swansea, as it goes beyond both</p>		

	<p>any policy in the LDP and national policy so cannot be introduced by an SPG.</p> <p>There are also concerns in relation to the proposed change in the position of this guidance insofar as the proposed application of minimum space standards is concerned. The current SPG requires developers 'to make reference to' the Welsh Housing Quality Standards and goes on to state that they are tried and tested space standards which are a valid reference for all developments and not just for affordable homes. The consultation draft introduces a requirement for all new development, not just affordable homes, to meet the national space standards with seemingly no exemptions to the requirement and certainly no consideration of issues such as development viability.</p> <p>It is understood that although there is a new space standard due to be published very soon by Welsh Government (a revised DQR document) which will be similar to NDSS, this will apply to affordable homes only and not private dwellings. Again, the draft SPG seeks to introduce a requirement that is inconsistent with national policy.</p>		
3	<p>Para's K.10 &amp; K.11 – Notwithstanding the recent studies undertaken in respect of space standards within European / UK homes and the Nationally Described Space Standard (NDSS 2015) – we must object to your proposals to introduce the proposed Minimum Gross Internal Floor Areas as set out in your Fig K.5.</p> <p>The NDSS document referred to above is a document produced via the English Planning system and which does <b>not</b> apply to Wales. The proposed inclusion of these space standards would not comply with the requirement for an SPG as it goes beyond any policy set out in the LDP and any current National Policy set out via the Welsh Government - as devolved authority on such matters.</p> <p>Where Local Authorities identify the need for internal space standards, the LPA should provide full justification for introducing such requirements and will need to take account of the 'need', 'viability' and 'timing' in order that landowners / developers have a transitional period to adapt and incorporate any proposed new standards into their future land purchases contracts and development viability appraisals. The majority of Strategic Residential sites (alongside the smaller site allocations) will have already been legally contracted, with established land values based upon the parameters set out in current planning policy documents and therefore, the proposed introduction of new min. space standards will render many of these sites 'unviable'.</p> <p>Furthermore, whilst we understand that the Welsh Government are currently undertaking a review of their DQR design standards, there has been no formal publication of any new</p>		

	standards and even so, any such new DQR standards will only be applicable to new grant funded affordable social housing units. We therefore, request that this Draft SPG is amended to <b>exclude the introduction of the proposed new Minimum GIA floor areas.</b>		
5	<p>Proposals for new homes and residential conversions of existing buildings will be assessed against the floor space table (fig K.5) which are the Nationally Described Space Standard (NDSS) (2015). These evidence-based space standards which are valid for all developments and not just for affordable homes. These standards supplement LDP policy PS2 (Placemaking and Place Management (and its expanded text).</p> <p>The same viability point applies (as per comments on an increase in 'spec' from a placemaking and GI perspective) to the application of space standards to market housing, as there will be viability concerns which have been evident in England with 106 obligations and CIL lost/ not levied as a result of viability issues. Therefore, a careful balance needs to be struck to ensure a development can provide its 106 obligations where appropriate and reasonable to do so.</p>		
6	<p>Paragraph's K.10 &amp; K.11: In accordance with the recent studies undertaken of space standards in homes in the UK and Europe in line with the Nationally Described Space Standard (NDSS 2015), we strongly object to the proposed introduction of a Minimum Gross Internal Floor Areas (see Fig K.5). (This NDSS document was produced via the English Planning system and is not applicable in Wales.</p> <p>In addition, the proposed inclusion of these 'space standards' do not comply with the requirements of an SPG as they are not included within any policy within the LDP; neither are they included in any current National Policy from Welsh Government (ie the devolved authority). When a local authority identifies the need for standards when it comes to internal spaces, it is up to the LPA to provide just validation for the inclusion of such requirements. The local authority should also take into account key points such as the 'need', 'viability' and 'timing' to enable developers and landowners to have time to amend and include any new standards when it comes to future land acquisition and the feasibility plans for new developments.</p> <p>We are aware that Welsh Government is, at present, reviewing the national DQR design standards; but to date there has been no confirmation or publication of new standards. That said, any new DQR standards can only apply to new grant funded affordable social housing units. As result of these observations, we ask that the Draft SPG excludes the introduction of the suggested Minimum GIA floor areas.</p>		
11	The SPG updates the minimum space standards and includes, as a guide, the Nationally Described Space Standards which is		

	<p>currently English Planning guidance. The reason for this is that the WG are still to publish their space guidance. We are very conversant with the concept and benefits of Space Standards (including Lifetime Homes) as we have been developing grant funded homes for social rent to these standards (DQR 2005) for many years where this has been a mandatory requirement. However, we often develop homes for sale, often alongside our social homes – and we understand the commercial viability challenges of achieving the same Space Standards on homes that are not grant funded.</p> <p>The commercial reality of housebuilding in Wales makes achieving the Space Standards in the SPG impossible for some private developers. Development costs now need to reflect mandatory requirements for SUDs, Sprinkler systems, inclusion of play and public open space, and soon Green Infrastructure and Low Carbon homes will become mandatory. All of this makes the delivery of homes in Wales more challenging commercially, but developers are trying to catch up as we know that more and better homes are required to address other agendas. This challenge needs to be recognised by Swansea Council and a more pragmatic approach adopted to the application of Space Standards.</p> <p>The Space Standards represent what Swansea Council considers to be the target for all homes. Developers should be encouraged to achieve these but if they fall short for commercial reasons, this should result in refusal. Homes with excessively small space standards should be strongly discouraged. Pobl are willing to work with Swansea Council on the issue of space standards, as we have considerable experience of this. We have successfully developed homes for sale to a good space standard alongside homes for social rent. We have received positive feedback from our purchasers in relation to the space in their homes.</p>		
13	<p>The use of space standards is welcomed. However, the NDSS cannot be imposed through a SPG if they have not been incorporated into a Development Plan first.</p> <p>The NDSS was introduced on 27 March 2015 in England only and was done so through a Written Ministerial Statement on that date. The standards themselves are set out in a document entitled “Technical Housing Standards – Nationally Described Space Standards”. It was amended on 19 May 2016.</p> <p>The status of the NDSS is explained in the “Housing: Optional Technical Standards” section of the Planning Practice Guidance, which was introduced on the same day as the Written Ministerial Statement (27 March 2015) and updated in part on 19 May 2019. The start of the text, which is dated 27 March 2015 reads:</p> <p><i>INTRODUCTION What are the new optional technical housing standards? The government has created a new approach for the setting of technical standards for new housing. This rationalises</i></p>		



	<p><i>the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes. The government set out its policy on the application of these standards in decision making and plan making in a written ministerial statement, which also withdraws the Code for Sustainable Homes aside from legacy cases.</i></p> <p>It is then stated at Paragraph 2 of the PPG: ‘What optional technical housing standards can local Planning Authorities set?’ <i>Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans.</i></p> <p>It follows that an LPA cannot impose the NDSS simply because the officers or members wish to do so. The LPA must gather evidence to justify the imposition of these standards, including needing to show why standard should be imposed which are above those set out already in Building Regulations. Thereafter, the LPA can only introduce them through the local plan process. That is, through the full process of preparing an evidence base for the plan, public consultation, consideration by an independent planning inspector, an examination in public and adoption of the plan. None of this has happened in Swansea.</p> <p>In addition, DQR or WHQS Standards are applicable to affordable housing in Wales. It is, therefore unlawful to ask for affordable dwellings to meet higher standards than those already specified by Welsh Government who have not introduced NDSS. If Swansea wish to include the NDSS in the SPG then the wording of paragraph K.10 should be amended to reference it as an optional standard instead of mandatory standard until such time as WG see fit to introduce their own version of the NDSS. Another reason for making them optional is that increased floor areas mean that the density specified in paragraph B4 of 35 dwellings per hectare might not be achievable and the sales price is unlikely to increase meaning the viability of the site is brought into question.</p>		
10	Page 15 - ‘Variety of Housing’. As well as green spaces, a house large enough for a family should have a reasonable garden.	Paragraph K.14 indicates that in developments of 100 homes or more it is expected that 25% of homes will have sufficient size gardens for extension zones.	Amend paragraph K.14 as follows:
11	<p>Section K. Gardens and private amenity space. The principle of having 25% of gardens being large enough to accommodate a future extension is sensible and understandable.</p> <p>The difficulty will be the effect of this upon commercial viability, along with a methodology of deciding which homes will benefit from the larger gardens.</p>	<p>Therefore on these larger sites there will be a mix of accommodation so this requirement will not hinder the achievement of the 35 dwellings per hectare target.</p> <p>There is no requirement to include surplus capacity in the SUDs system and instead any garden room or extension is likely to be under the 100sqm threshold requiring SUDs.</p>	<p>K.14 <u>To future proof new places and allow scope for lifetime homes it is expected that for developments of 100 homes or more, a proportion of the homes will have gardens of sufficient size to allow for a rear extensions and/or ancillary multi-functional garden rooms to be delivered whilst still leaving garden amenity space that would accord with the standards set out in the SPG.</u></p>

3	<p>Paragraph K.14 – We object to the inclusion for the requirement of “25% of the homes will have gardens of sufficient size for rear extensions and ancillary multi-function garden rooms”. This requirement will have a <b>detrimental impact</b> upon the layout design and is likely to impact upon the requirement for new developments to achieve an average net density of 35 units per/Ha.</p> <p>Furthermore, this requirement will need to be factored into the SUDS design / approvals which will create the need to over-engineer the initial drainage design and generate additional development costs together with an increase to the SAB Commuted Sum.</p> <p>Paragraph K.16 – Again, the requirements set out in this paragraph are over burdening the developers and will have the same consequences as highlighted in respect of paragraph K.14 above</p>	<p>Therefore this requirement is considered to be valid for developments of 100 homes or more, but the requirement in relation to 25% of homes can be removed to allow flexibility to apply this to individual sites.</p> <p>The requirement in K.16 to be able to accommodate a 3x3 patio area, rotary dryer and small shed is a fair test to ensure the gardens are useable and suitable. Note that the wording of this paragraph does not require these items to be provided, just tested that they can be accommodated.</p> <p>Paragraph K.21 indicates that consideration should be given to longer gardens to allow for future extensions. This is not indicated as a requirement, and this links back to K.14 which indicates where gardens are designed to minimum standards the they are likely to have Permitted Developments Rights for extensions removed to ensure that the area of useable garden is protected.</p>	
4	<p>Paragraph K.14: We also object to the inclusion of the proposal for “25% of the homes will have gardens of sufficient size for rear extensions and ancillary multi-function garden rooms”. This constraint will have a negative impact on the design and layout as well as on the requirement for new developments to achieve an average net density of 35 units per/Ha.</p> <p>In addition, this requirement would need to be incorporated into SUDS design and approvals processes which will result in over-engineering of the initial drainage design and generate further development costs together with an increase to the SAB Commuted Sum.</p> <p>Paragraph K.16: Again, the requirements put an additional burden on developers and will have the similar consequences as highlighted with regards to paragraph K.14 above.</p>		
3	<p>Paragraph K.21 – Providing greater back-to-back separation distances in order to cater for ‘<i>future domestic extensions</i>’ will again have similar consequences in respect of overall site densities together with development viability appraisals.</p>		
6	<p>Paragraph K.21: The proposal to provide bigger back-to-back separation distances to plan for ‘future domestic extensions will again have similar consequences when it comes to overall site densities as well as development viability appraisals.</p>		
15	<p>Paragraph K.18 requires all flats to provide full height glazing to maximise natural lighting and outlook from the main living space. Paragraph K.17 requires the provision of balconies/Juliet balconies in all new build flats. PHWW considers that the wording of K.18 should not necessarily be a requirement and should allow flexibility to additional full height glazing over and</p>	<p>Agreed paragraph K.18 can be amended to remove reference to the main living space so not to preclude full height glazing to other rooms in addition to living spaces.</p> <p>The need for airiness and indoor/ outdoor connection for residents of flats especially balconies/ French doors has been brought into focus during the Covid-19 lock down.</p>	<p>Amend paragraph K.18 as follows:</p> <p>All flats are expected to provide full height glazing to maximise natural lighting and outlook. Where single aspect north facing flats are justified as a placemaking approach there should be a daylighting assessment to demonstrate that these are not gloomy.</p>

	above the openings to the balconies to ensure it is appropriate for the overall design of the flats/apartments.		
11	Protection of Residential Amenity. Are the separation distances that are set out in this part of the SPG applicable to residential developments within 'suburban areas', or do they also apply in higher density parts of towns and cities? In higher density developments, especially where existing building lines and established character suggests a denser form of development, the application of rigid separation distances contradicts other placemaking principles within this SPG. There should always be the ability to pragmatically apply these rules flexibly according to site specifics.	Paragraph K.23 states "In some instances such as higher density developments, innovative schemes and designated heritage assets including conservation areas and listed buildings it may be possible to achieve appropriate privacy through design and screening rather than physical separation. However, this must be demonstrated, and is considered on a case-by-case basis."  Therefore, there is sufficient flexibility to address privacy in higher density schemes without necessarily requiring the separation distances.	No change
9	On P96, the required back-to-side distance is stated as being 15m. I suggest this is a little too generous and could lead to an inefficiency with the residential block. (I would also note that the storey height and level change should also be a factor.) We would typically expect 12m a reasonable distance.	In back to side relationships there can be a blank side gable at the end of the garden for the corner property. It is felt that a 12m back to side distance would result in unacceptable overshadowing and overbearing and that 15m strikes the appropriate balance between amenity and density of layout.	No change
11	Section L: Accommodating Parking. A mixed approach to parking is supported, as is a pragmatic application of parking standards where sustainable travel objections can be evidenced. Parking on plot in front of the home is sometimes necessary – especially for terraced homes, and to avoid large rear parking courts, which cause other issues such as community safety.  Pobl has demonstrated at Beacon Hill how frontage parking and integral garages can be achieved imaginatively whilst still achieving good placemaking principles. The role of on-street parking will become more prominent as the parking on pavements becomes illegal in Wales. Consideration should be given to wider street design, which streets are appropriate for on-street parking, and whether resident only permits will apply – as they do in established part of Swansea. The implications of Electric Vehicle Charging on streets of terraced homes with on-street parking will become a challenge which both Swansea Council and developers will need to overcome with imaginative solutions.	The support for this guidance module is noted.  Frontage parking can work where part of the placemaking approach combining planting and GI so that the parked cars do not dominate the streetscene.  The guidance encourages a return to on street parking and this is actively being discussed on at least one strategic housing development.	No change
13	Section L – Accommodating parking. One of the key questions on page 104 asks if electric vehicle charging can be provided or retro fitted in the future. Unless there is on plot parking it is difficult to provide the necessary infrastructure and there are also issues with capacity in the network in certain locations which also means it is not possible to provide it. Passive provision, however, is one way to ensure the infrastructure is installed with it then being up to the individual homeowners to arrange the final point of connection but this is only applicable to new developments and cannot be retrofitted to existing developments for the reasons highlighted above.	The evolution of electric vehicle technology is evolving rapidly and new charging systems will become available. This should not preclude on street parking in new developments, plus street charging of electric vehicles will need to be retro fitted for the many thousands ad existing homes that only have on street parking.	No change

14	Section L. Internal parking arrangements should be private, controlled, best gated. Even better, consideration of parking blocks away from homes (easily walkable) as in Reiselfeld (Freiburg). Open access internal parking (and internal front doors) should be discouraged. (Poundbury is an interesting reference.) This is a challenge in our planning and developer culture.	The document provides clear guidance on the design of rear parking courts including security, access and natural surveillance.	No change
7	In respect of Accommodating Parking on Page 99 of the Guide could it be added "All parking bays must be overlooked by rooms in properties preferably that are usually occupied".	Whilst parking spaces should be well overlooked for personal safety and to discourage car crime as already stated in the document as a principle on page 104 (Ensure car parking is usable, safe and secure for both people and vehicles). It is not appropriate to require that the house served provides the overlooking because this would preclude side drive arrangements and rear parking courts.	No change
7	On page 86 (Community Safety) it states that all schemes should apply for Secured by Design accreditation. I fully support and welcome this. However please could words like, "To minimise opportunities for crime to be generated or increased, community safety should be prioritised in accordance with Secured by Design principles;" be added.	Support welcomed and suggested wording can help give clarity to section J	Amend second sentence of J.2 as follows: <u>To minimise opportunities for crime to be generated or increased, community safety principles should be applied in accordance with Secured by Design principles without conflicting with placemaking principles.</u>
4	What we build will last 100 years so we need to get places right and don't create costs for policing. Parking and connectivity are key issues for crime/ safety. Design out pavement parking.	The document sets a framework for safe sustainable places as the basis for cohesive communities. Green infrastructure is an opportunity to design out inappropriate parking.	No change
14	Para 2.39 referring to LDP policy SD 2: Masterplanning Principles should be reworded to read: 'This policy sets the required placemaking approach for sites where, <b>with adjoining/ nearby sites</b> , there is capacity for 100 homes or more. This applies to the note on 50 unit developments etc, which we agree with.	Paragraph 2.39 is a summary of LDP Policy SD 2: Masterplanning Principles so the wording and scope cannot be changed via the SPG. However, it should be noted that guidance module A sets out the importance of taking a holistic overview of neighbourhoods ie outside the red line boundary of the site.	No change
14	3.7 (bullet 1) ... a desire to positively integrate <b>existing</b> trees, habitat and landscape features and achieve a net gain in biodiversity	First bullet point of 3.7 already has this wording.	No change
11	Sustainable Design principles as part of the art of Placemaking. There are fundamental ideas such as 'Fabric First', form factor, solar orientation, overheating, water use and other criteria that need to figure prominently in this SPG. Each home built to today's Building Regulation standards, is another home which will need to be retrofitted by its owners within less than a generation. The SPG requires a section on Sustainable Design. The Integration of Renewable Technologies Renewable energy generation at a micro level and other technologies for residential living such as electric vehicle charging need to be included within this SPG. As Wales moves way from fossil fuels for the	Sustainability or low carbon requirements for buildings can only be set nationally via Building Regulations or national planning policy. In future this may be addressed in the LDP and at present the LDP requires energy strategies for strategic sites. It is not appropriate to set these standards via this SPG. Page 104 sets a key question in relation to inclusion of electric vehicle charging or the future potential to retrofit this. Paragraph I.5 supports the positive integration of sustainable technologies, noting " With a move towards	No change



	<p>heating and power of our homes, so we need to accept that technology will figure more prominently in the townscapes of the future.</p> <p>The Council as planning authority needs to consider that balance between the way new developments look (aesthetics) and the way they function – which includes decarbonisation as well as health, wellbeing, sense of community, and environmental impact. Renewable technologies will evolve and the SPG should take a pragmatic and flexible view, accepting that initially this may result in aesthetically unappealing buildings as society adjusts to the changes it must make rapidly</p>	<p>lower energy lifestyles this will change the way homes look; this is an opportunity for contemporary design in neighbourhood locations utilising modern materials and innovative architecture.”</p>	
2	<p>The Canal &amp; River Trust supports the restoration of all abandoned canals, and we own and maintain the majority of the existing route of the Swansea canal. The Trust is not currently leading on the restoration of the Swansea Canal, but we fully recognise and support the hard work and dedication of the volunteers of the Swansea Canal Society (SCS), and the Inland Waterways Association in both campaigning and working on the ground along with the Waterways Recovery Group to delivery improvements to the canal.</p> <p>The Trust see design and placemaking as playing a key role in creating attractive waterside places that will enhance and protect the waterway. In our capacity as statutory consultee we, strive to make sure any new waterside development enhances the wider waterway corridor and protects the intrinsic qualities that waterways offer. This can be achieved in several ways and is dependent on many factors, many of which are suitably covered in the document.</p> <p>Although there is limited scope for new development alongside the Swansea canal, like all new development sites, each waterside location needs to be considered individually, with no single design approach being appropriate in all locations. The following guiding principles should be taken into account so that, where appropriate, new waterside development should:</p> <ul style="list-style-type: none"> <li>• positively address the water</li> <li>• integrate the towing path and open up access to the water</li> <li>• link waterside space and the waterspace</li> <li>• use the waterspace itself</li> <li>• incorporate access and other improvements</li> <li>• engage with and tease out the qualities and benefits of being by water</li> <li>• reflect the scale of the local waterway corridor to the wider neighbourhood</li> </ul> <p>We advocate that new development positively addresses the waterspace with roads and parking hidden by housing and this often causes a conflict when placemaking suggests that housing addresses roads in a similar way. We suggest that the canal be considered as a highway too and so development may need to</p>	<p>Waterways are important corridors both people, nature and recreation.</p> <p>A number of sites in Swansea relate to the canal network not least in Clydach and the SA1 Port Tennant areas.</p> <p>The LDP sets out protected areas that are safeguarded for canal reinstatement.</p> <p>The SPG sets a approach of responding to context including waterways and public areas such as canals.</p>	No change

	<p>effectively be double fronted to prevent back gardens, high privacy fencing and garden paraphernalia fronting onto the waterway which may have an adverse impact on the canal corridor.</p> <p>The canal represents a very important multi-functional green infrastructure asset running through the city and county of Swansea and linking to Neath Port Talbot. Development alongside it should consider all aspects of the canal and protect and enhance the network without preventing future restoration or improvement. We would encourage potential developers to undertake pre-application discussions with us and to include the canal or restoration route, towpath and environs within their application site.</p>		
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