

Submission of Evidence Form – National Development Framework

Name	Daniel Lloyd Persimmon Homes West Wales
Contact details	Dragon House, Parc Y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ
Date	07/03/2017
Title of evidence	Persimmon Homes West Wales response to NDF Call for Evidence & Projects
Summary of evidence	See Covering Letter & attached Annexe
Summary of key issues/conclusions	See Covering Letter & attached Annexe
Why have you submitted this evidence?	See Covering Letter & attached Annexe
How should this evidence inform the development of the NDF?	See Covering Letter & attached Annexe
How does this evidence and any actions it recommends help achieve the 7 well-being goals?	See Covering letter & attached Annexe
Why is the evidence of national significance?	See Covering Letter & attached Annexe
Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)	Yes

Submission of Projects Form – National Development Framework

Name	Daniel Lloyd Persimmon Homes West Wales
Contact details	Dragon House, Parc Y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ
Date	07/03/2017
Interest in site	See Covering Letter & attached Annexe
Details of landowner	See Covering Letter & attached Annexe
Title of project	Margam
Summary of project	See Covering Letter & attached Annexe
Location of project (Please attach location map)	See Covering Letter & attached Annexe
What consents are required?	See Covering letter & attached Annexe
Consents already granted relevant to project	See Covering Letter & attached Annexe
Public engagement to date	See Covering Letter & attached Annexe
Has an environmental assessment been prepared? (Yes / No)	See Covering letter & attached Annexe
Are there any site designations or constraints affecting the site?	See Covering Letter & attached Annexe
What is the delivery timescale for the project?	See Covering Letter & attached Annexe

How would the project contribute to the delivery of the 7 well-being goals?	See Covering letter & attached Annexe
Why is the project of national significanc?	See Covering letter & attached Annexe
Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)	Yes

Submission of Projects Form – National Development Framework

Name	Daniel Lloyd Persimmon Homes West Wales
Contact details	Dragon House, Parc Y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ
Date	07/03/2017
Interest in site	See Covering Letter & attached Annexe
Details of landowner	See Covering Letter & attached Annexe
Title of project	Penllergaer
Summary of project	See Covering Letter & attached Annexe
Location of project (Please attach location map)	See Covering Letter & attached Annexe
What consents are required?	See Covering letter & attached Annexe
Consents already granted relevant to project	See Covering Letter & attached Annexe
Public engagement to date	See Covering Letter & attached Annexe
Has an environmental assessment been prepared? (Yes / No)	See Covering letter & attached Annexe
Are there any site designations or constraints affecting the site?	See Covering Letter & attached Annexe
What is the delivery timescale for the project?	See Covering Letter & attached Annexe

How would the project contribute to the delivery of the 7 well-being goals?	See Covering letter & attached Annexe
Why is the project of national significanc?	See Covering letter & attached Annexe
Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)	Yes

Submission of Projects Form – National Development Framework

Name	Daniel Lloyd Persimmon Homes West Wales
Contact details	Dragon House, Parc Y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ
Date	07/03/2017
Interest in site	See Covering Letter & attached Annexe
Details of landowner	See Covering Letter & attached Annexe
Title of project	Bridgend West
Summary of project	See Covering Letter & attached Annexe
Location of project (Please attach location map)	See Covering Letter & attached Annexe
What consents are required?	See Covering letter & attached Annexe
Consents already granted relevant to project	See Covering Letter & attached Annexe
Public engagement to date	See Covering Letter & attached Annexe
Has an environmental assessment been prepared? (Yes / No)	See Covering letter & attached Annexe
Are there any site designations or constraints affecting the site?	See Covering Letter & attached Annexe
What is the delivery timescale for the project?	See Covering Letter & attached Annexe

How would the project contribute to the delivery of the 7 well-being goals?	See Covering letter & attached Annexe
Why is the project of national significanc?	See Covering letter & attached Annexe
Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)	Yes

Submission of Projects Form – National Development Framework

Name	Daniel Lloyd Persimmon Homes West Wales
Contact details	Dragon House, Parc Y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ
Date	07/03/2017
Interest in site	See Covering Letter & attached Annexe
Details of landowner	See Covering Letter & attached Annexe
Title of project	Llanilid
Summary of project	See Covering Letter & attached Annexe
Location of project (Please attach location map)	See Covering Letter & attached Annexe
What consents are required?	See Covering letter & attached Annexe
Consents already granted relevant to project	See Covering Letter & attached Annexe
Public engagement to date	See Covering Letter & attached Annexe
Has an environmental assessment been prepared? (Yes / No)	See Covering letter & attached Annexe
Are there any site designations or constraints affecting the site?	See Covering Letter & attached Annexe
What is the delivery timescale for the project?	See Covering Letter & attached Annexe

How would the project contribute to the delivery of the 7 well-being goals?	See Covering letter & attached Annexe
Why is the project of national significanc?	See Covering letter & attached Annexe
Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)	Yes

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Planning Directorate
Welsh Government
Cathays Park
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7th March 2017

Dear Sirs

RE: Call for Evidence and Projects / National Development Framework

With reference to the above, please find enclosed Persimmon Homes West Wales representations to the Call for Evidence and Projects / National Development Framework. We welcome the opportunity to comment on the content of the publication.

This submission discusses the following items:

- Housing Need;
- New Towns/Garden Villages;
 - Margam;
 - Penllergaer;
 - Llanilid;
 - Bridgend West;
- Planning Policy Wales (Edition 9, November 2016);
- Transport Links;
- Swansea Bay Tidal Lagoon;
- Swansea City Deal; and
- Summary/Conclusion.

Supporting representations on the following sites:

- Margam;
- Penllergaer Extension;
- Bridgend West; and
- Llanilid.

For each project put forward, the following information is (as required) enclosed:

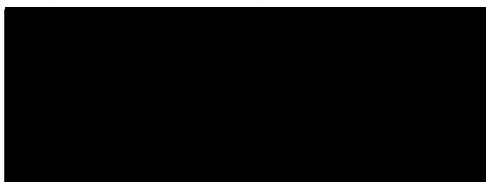
- A completed, submission of projects form;
- A plan of the site put forward for consideration; and
- An Appraisal of the individual sites put forward for your consideration.

Our detailed case is included as an Annex to this letter. This detailed case is in support of, and to make the case for suggested provisions to be contained within the National Development Framework.

Given the detailed nature of these representations we would be happy to discuss any aspect of the submission made and credentials of the proposals submitted, when Welsh Government comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Strategic Land & Planning Co-ordinator



For and on behalf of Persimmon Homes West Wales

Annex

This annex sets out the detailed case in support of these representations. It provides suggested provisions to be contained in National Development Framework.

The representations are structured as follows:

Table of Contents

- Housing Need
- New Towns / Garden Villages (Margam, Penllergaer, Llanilid and Bridgend West)
- Planning Policy Wales (Edition 9, November 2016)
- Transport Links
- Broadband from the Gower
- Swansea Bay Tidal Lagoon
- Swansea City Deal
- Summary of Key Issues/Conclusions

Housing Need

We believe that the provision of sufficient housing in correct locations is critical for the Future Wellbeing of Wales and is something that contributes to meeting all of the Wellbeing Goals either directly or indirectly. Linked to this is the provision of a range of associated infrastructure requirements and the need for the provision of these to be aligned with the delivery of housing. This concept has recently been supported by the first recommendation of the Economy, Infrastructure and Skills Committee – National Infrastructure Commission for Wales Report (January 2017) which included the following recommendation:

'The remit of the commission should be extended to include the supply of land for strategically significant housing developments and related supporting infrastructure alongside the economic and environmental infrastructure.'

The Future Need and Demand for Housing in Wales September 2015 Alan E, Holman's Cambridge Centre for Housing and Planning Research gives the most up to date figures for Wales and can be used as the starting point. The report looks at the period 2011-2031 and concludes that we need to provide between 8,700 – 12,000 homes annually. Based on build rates between 2011 and 2016 we have already under delivered by 13,500 dwellings based on the two annual need figures identified.

Calculating Housing Requirement

The National Development Framework offers the opportunity to make a clear statement about how the housing requirement should be calculated. This specifically takes account of the latest statistical information available as the starting point, while also considering the need to support economic growth and ambitions for Wales.

Although we do not support a national housing figure being set by the NDF, if Welsh Government are minded to do so then we believe this should be set as a minimum figure based on the most recent national population and household projection figures. This should then be specifically addressed at a local level via a Local Housing Market Assessment in line with Planning Policy Wales. We respectfully request that all stakeholders should have the opportunity to comment and input on this evidence base, to ensure robust housing numbers are used in the preparation of Local Development Plans.

Economic Benefit of Housing

The Economic Footprint of House Building in Wales May 2015 Litchfield's (NLP) report provides a good starting point in understanding the wider economic benefits of house building. The Affordable Housing sector also produces a similar report annually. The National Development Framework provides an opportunity to make their relationship clearer providing a policy framework to support it.

We therefore respectfully request that housing need goals are contained at the heart of the National Development Framework, to ensure the Well-being of Future Generations Act targets are achieved.

New Towns / Garden Village

As noted above, there is a critical need to achieve large-scale growth in Wales. The projected housing need currently notes a requirement for 10,350 houses to be delivered per annum (based on the mid point of the range). Therefore, there will be a need to allocate large strategic growth areas, to enable the requisite level of growth to be achieved across Wales.

We note that there is currently a significant barrier to large-scale development defined in Planning Policy Wales. This is specifically referenced at Paragraph 9.2.7, whereby it is detailed that:

*'Any new proposals for **new settlements** should be promoted through, and fully justified in, the development plan. Plans should state clearly the contribution which developers will be expected to make towards the provision of infrastructure, community facilities and affordable housing. **New settlements on Greenfield sites are unlikely to be appropriate in Wales, and should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements.***

Garden villages and new towns provide opportunities to deliver large-scale housing to serve communities throughout Wales. We therefore respectfully request that Paragraph 9.2.7 is amended to enable new settlements to be considered where appropriate. Furthermore, we have detailed below four schemes capable of delivering large-scale growth along the M4 corridor. These are detailed as follows.

Margam

The site provides an opportunity to provide large-scale growth on the borders of Neath Port Talbot local authority and Bridgend local authority. A location plan detailing the proposed location and extent of the proposed new town is attached. The site does not currently benefit from planning permission although a hybrid planning application could be submitted capturing a variety of uses and benefits, including but not limited to:

- Delivery of circa 7,000 dwellings
- New M4 junction
- Affordable Housing
- Commercial Development
- New School
- Public Open Space
- Community Facilities
- Health Care facilities
- Infrastructure Upgrades

The site is not currently allocated in Neath Port Talbot's adopted Local Development Plan, although there will be an opportunity to promote the site's inclusion in the Local Development Plan review. The delivery timescale is considered medium to long term and the site would contribute to meeting all of the well-being goals either directly or indirectly. The project is of national significance as it would require a change in policy at national level (PPW Paragraph 9.2.7) to allow new settlements on Greenfield land and local level (LDP) to allocate the site for development.

Key attributes relating to the site are detailed as follows:

Economic Viability

- There are no economic constraints which will affect the development of the site
- The landowner is in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of land

Highways

- Given the scale of the development, there may be opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Sustainability

- The site is located within close proximity of frequent public transport services and facilities.
- The settlement of Pyle provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development.
- The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community.
- Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable location as compared to other, considerably more rural and remote areas.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA.
- The proposal will maintain the majority of the trees surrounding the site, and will not have any significant impact on the trees subject to TPO's.

Flood Risk

- The majority of development area is located in TAN 15 Zone A – at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development.

- There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

Given the points noted above, we respectfully request that the site at Margam is included in the National Development Framework. This could be via a specific allocation or defined as a broad location for a new settlement.

Penllergaer

This site provides an opportunity to provide large-scale growth to the north of Swansea whilst protecting the countryside to the north of the M4. A location plan detailing the proposed location and extent of the proposed new town is attached. The site does not currently benefit from planning permission although a hybrid planning application could be submitted capturing a variety of uses and benefits, including but not limited to:

- Delivery of circa 2,000 dwellings
- New M4 junction
- Affordable Housing
- Commercial Development
- New School
- Public Open Space
- Community Facilities
- Health Care facilities
- Infrastructure Upgrades

The site is not currently allocated in the City and County of Swansea's adopted Unitary Development Plan, although there will be an opportunity to promote the sites inclusion in the Local Development Plan review. The delivery timescale is considered medium to long term and the site would contribute to meeting all of the well-being goals either directly or indirectly. The project is of national significance as it would require a change in policy at national level (PPW Paragraph 9.2.7) to allow new settlements on Greenfield land and local level (LDP) to allocate the site for development.

Key attributes relating to the site are detailed as follows:

Economic Viability

- There are no economic constraints which will affect the development of the site
- The landowner is in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of land

Highways

- Given the scale of the development, there maybe opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Sustainability

- The site is located within close proximity of frequent public transport services and facilities.
- The settlement of Penllergaer/Gorseinon provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development.
- The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community.
- Penllergaer is also located in relatively close proximity to the city centre of Swansea, and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable location as compared to other, considerably more rural and remote areas.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape.
- The proposal will maintain the majority of the trees surrounding the site,.

Flood Risk

- The majority of development area is located in TAN 15 Zone A – at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development.
- There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

Highways

- Given the scale of the development, there maybe opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Given the points noted above, we respectfully request that the site at Penllergaer is included in the National Development Framework. This could be via a specific allocation or defined as a broad location for a new settlement.

Llanilid

The site provides an opportunity to provide large-scale growth to the north of the M4 on the border of RCT, Bridgend and the Vale of Glamorgan. A location plan detailing showing the proposed location and extent of the proposed new town is attached. The site does not currently benefit from an implementable planning permission, although a hybrid planning application could be submitted capturing a variety of uses and benefits, including but not limited to:

- Delivery of circa 2,500 dwellings
- New M4 junction
- Affordable Housing
- Commercial Development
- New School
- Public Open Space
- Community Facilities
- Health Care facilities
- Infrastructure Upgrades

The site is not currently allocated in Rhondda Cynon Taff's adopted Local Development Plan, although there will be an opportunity to promote the sites inclusion in the Local Development review. The delivery timescale is considered short to medium term and the site would contribute to meeting all of the well-being goals either directly or indirectly. The project is of national significance as it would require a change in policy at national level (PPW Paragraph 9.2.7) to allow new settlements on Greenfield land and local level (LDP) to allocate the site for development. The opportunities at the site at Llanilid include producing a sustainable settlement with good transport links to the M4 and the south Wales mainline and good links to the key towns and cities in Wales including Bridgend, Cardiff & Swansea.

Key attributes relating to the site are detailed as follows:

Economic Viability

- There are no economic constraints which will affect the development of the site
- The landowner is in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of land

Highways

- Given the scale of the development, there maybe opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Sustainability

- The site is located within close proximity of frequent public transport services and facilities.

- The settlement of Llanilid provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development.
- The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community.
- Llanilid is also located in relatively close proximity to the town centre of Bridgend, and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable location as compared to other, considerably more rural and remote areas.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape.
- The proposal will maintain the majority of the trees surrounding the site.

Flood Risk

- The majority of development area is located in TAN 15 Zone A – at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development.
- There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

Bridgend West

This site presents an opportunity to provide large-scale growth to the west of Bridgend. A location plan detailing the proposed location and extent of the proposed new town is attached. The site does not currently benefit from planning permission although a hybrid outline planning application could be submitted capturing a variety of uses and benefits, including but not limited to:

- Delivery of circa 10,000 dwellings
- Affordable Housing
- Commercial Development
- New School
- New M4 junction
- Public Open Space
- Community Facilities
- Health Care Facilities
- Infrastructure Upgrades

The site is not currently allocated in Bridgend County Councils adopted Local Development Plan, although there will be an opportunity to promote the sites inclusion in the Local Development review. The delivery timescale is considered

medium to long term and the site would contribute to meeting all of the well-being goals either directly or indirectly. The project is of national significance as it would require a change in policy at national level (PPW Paragraph 9.2.7) to allow new settlements on Greenfield land and local level (LDP) to allocate the site for development. The opportunities at the site at Bridgend include producing a sustainable settlement with good transport links to the M4 and the south Wales mainline and good links to the key towns and cities in Wales including Bridgend, Cardiff & Swansea.

Key attributes relating to the site are detailed as follows:

Economic Viability

- There are no economic constraints which will affect the development of the site
- The landowner is in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of land.

Highways

- Given the scale of the development, there maybe opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Sustainability

- The site is located within close proximity of frequent public transport services and facilities.
- The settlement of Bridgend provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development.
- The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community.
- Bridgend is also located in relatively close proximity to the city of Cardiff, and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable location as compared to other, considerably more rural and remote areas.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape.

- The proposal will maintain the majority of the trees surrounding the site.

Flood Risk

- The majority of development area is located in TAN 15 Zone A – at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development.
- There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

Highways

- Given the scale of the development, there maybe opportunities to provide a new M4 junction.
- Satisfactory highway access can be provided to serve the proposed site.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- Additional public transport services could be facilitated through the proposed development.

Given the points noted above, we respectfully request that the site at Bridgend West is included in the National Development Framework. This could be via a specific allocation or defined as a broad location for a new settlement.

Planning Policy Wales (Edition 9, November 2016)

The latest edition of PPW was officially published on the 17th of November 2016 and takes specific account of the provisions of the Planning (Wales) Act 2015 and the coming into force of the Well-being of Future Generations (Wales) Act 2015. Current Edition 9 and changes required to make the development acceptable in land use planning terms.

Changes contained within Planning Policy Wales (edition 9) ensure the policy document coaligns with the Future Wellbeing of Wales Act. As noted, unlike the Wales Spatial Plan, the NDF will have development plan status, meaning that all SDPs and LDPs must be in conformity with it. We agree with the approach taken, although we respectfully request that other elements of national policy and legislation are amended to ensure the aspirations of the National Development Framework can be achieved. This is of particular importance with regard to the points noted below:

- Set out where nationally important growth and infrastructure is needed and how the planning system can deliver it;
- Provides direction for SDPs and LDPs;
- Supports the determination of applications under the Developments of National Significance (DNS) regime.
- Will sit alongside Planning Policy Wales, which sets out the Welsh Government's national planning policies and will continue to provide the context for land use planning; and
- Supports national economic, transport, environmental, housing, energy, and cultural strategies and ensure they can be delivered through the planning system.

Local Development Plan Manual (Edition 2 – August 2015)

The Local Development Plan Manual is an online reference document to aid in the delivery of Local Development Plans. The LDP Manual should be considered alongside the LDP Chapter in Planning Policy Wales. We consider that this document will be out of sync with national policy and any subsequent changes to national legislation. Given the important role the Manual has in the development plan process, we therefore respectfully request this is amended to ensure compliance with the National Development Frameworks aspirations.

It is noted that the Manual is non-statutory and does not constitute national policy. Regulations and national policy on the LDP system are published separately. The following documents are of particular relevance to the plan making process and are generally read alongside the LDP Manual:

- The Town and Compulsory Purchase Act, 2004 Part 6.
- The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 S.I. 2005/2839 (W.203) – ("the LDP Regulations") As amended, including by The Town and Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 S.I. 2015/1598 (W.197) (*the 2015 Amendment Regulations*).

- Planning Your Community (Public Guide to Local Development Plans) [2006] (Welsh Government).
- Local Development Plan Examinations: Procedure Guidance [2015] (the Planning Inspectorate Wales).
- "LDPs: Preparing for submission – Guidance for Local Planning Authorities" [2015] (the Planning Inspectorate Wales).
- The statutory requirements for Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA) and Habitats Regulations Assessment.

Due to the important role a number of these policies/legislations play in the plan making process, we consider it to be of great importance that these are considered in the whole, when drafting of the National Development Framework commences.

Transport Links

Although we agree with the approach to bring forward the Metro Line in South Wales and believe this offers a great opportunity to deliver infrastructure and investment in South Wales. This does not extend to Swansea; therefore this risks the growth aspirations of the City and County of Swansea which can also lead to further growth opportunities in West Wales.

The Metro Line can provide a catalyst for transforming the economic and social prospects of South Wales and the country as a whole. We therefore feel it is critical that West Wales benefits from the Metro Line.

A number of key benefits will be captured, which were highlighted in the 2013 Metro Impact Study. They include: direct economic benefits through easier access to employment across the region; agglomerative benefits (i.e. clusters of firms interacting with each other); development and regeneration benefits on key corridors and around key stations; environmental and sustainable benefits. Enhanced connectivity is also needed to support population growth and to tackle increasing road congestion.

Although it is noted that Phase 1 of the delivery of the Metro was projected to cost £77 million, there are a number of opportunities across Wales where other forms of development can help to assist with funding growth across Wales.

Heavy Rail and the electrification of the South Wales Main Line from Swansea to Paddington is a key driver to boosting Swansea's connectivity with the rest of the UK through the provision of more frequent trains and/or longer trains. In addition to this, increased service frequency on the Cambrian mainline will help boost the economy of West Wales through the provision of services that are commuter friendly.

Light Rail is ideal for urban and suburban transport allowing more frequent and faster services that can carry large numbers of people and move easily either on traditional railway track or on rails placed in streets. As a result, there are a number of opportunities where light rail could be used in and around Swansea including from the City Centre to the Gower and from the City Centre along Fabian Way via SA1 to Coed Darcy.

Bus Rapid Transport is already being used in and around many towns and cities in Wales including Swansea where dedicated Park & Ride facilities are in operation at Landore & Fabian Way and both of which have access to exclusive bus links helping them to provide a fast and reliable service 6 days a week for 12 hours a day. However, there are opportunities to expand the service further given the location of the new Swansea University Bay Campus off Fabian Way.

The Swansea Bay City Deal also has a part to play in helping to maintain and improve existing transport links as well as fund the provision of new ones to get people from the homes that will be built to the jobs that will be created.

Furthermore, it is worthy of note that although we support the electrification of the railway line in Wales, we believe there are clear economic benefits to extending the electrification of the line to Swansea. In July 2009 the Labour Government announced its intentions to electrify the Great Western Railway Line between London, Reading, Oxford, Newbury, Bristol, Cardiff and Swansea, to be completed within eight years (i.e. by 2017). The estimated cost was £1 billion. It was intended

that the scheme would cut costs, reduce environmental impacts, increase capacity, improve reliability and improve the passenger experience.

By March 2011 the Coalition Government had confirmed its intention to electrify commuter services on the Great Western Main Line (GWML) from London to Didcot, Oxford, Newbury, Bristol and Cardiff. However, there are now concerns over the electrification of the line from Cardiff to Swansea. The NDF must address this uncertainty as the benefits not only to Swansea but all of the stations along the line between Cardiff and Swansea will benefit from more frequent trains and/or longer trains too

Given the points noted above, we respectfully request that the National Development Framework provides specific policy support for both the Metro Line and the Electrification of the Railway line across South/West Wales.

Broadband from the Gower

As part of the City and County of Swansea's proposed £500m City Deal, proposals have been put forward for *"The Internet Cost – Digital Infrastructure"*.

A Summary of the Project is set out below:

The Internet Coast (Infrastructure and Test Bed) programme will be an enabling programme with the following aims:

- Placing the City Region at the forefront of strategic global trends;
- Developing large markets.
- Giving SBCR a true Unique Selling Proposition, differentiated from other regions in competitive World-wide industries.
- Developing an offer which builds on the region's asset base and core strengths but also adds to the wider economic benefits previous investments in SBCR have generated.
- Delivers a 'hyper-connectivity' agenda for the entire region with the aim of achieving 100% coverage and access to next generation broadband services, focus will be on rural & urban.
- Underpins the development of CENGs and delivery of the integrated thematic priorities and projects of the City Deal focusing on health and wellbeing, energy and economic acceleration.

Broadband links from the Gower

Sir Terry Matthews, Chairman of Swansea Bay City Region, said:

"Think of the way the internet and broadband networks have transformed communications worldwide. Now imagine the same principle applied to future energy systems, to health and well-being and any number of other sectors."

It is a massive opportunity and with City Deal support we can take a lead position in Wales and make our wider contribution to the UK and to Europe, Swansea Bay became world famous in 'the first machine age'. We aim to re-energise a vibrant and pioneering role in Wales and the UK as the world now enters 'a new digital machine age'.

There are echoes of the Industrial Revolution in this vision and I am pleased to be leading the region as we aim for a new place in the global economy."

It is anticipated that the transatlantic fibre optic cable will run from New York (USA) to Oxwich Bay in Gower (Wales) and discussions are said to be at an advanced stage. In terms of funding, the four local councils in the city region are looking at a £100m commitment over 20 years, with further contributions also expected to come from the private sector and the European Union, although in light of the United Kingdom's vote to leave the European Union, it can be anticipated that there may be funding shortfalls.

For the reasons noted above, we respectfully request that high speed broadband is delivered to south/west Wales, to ensure the economic ambitions for the area can be achieved and the Well-being of Future Wales Act targets can be met.

Swansea Bay Tidal Lagoon

Swansea Bay Tidal Lagoon has received widespread support from the local community throughout its five year development. 86% of local people registered their support for the project during community consultation with almost 1,000 residents signing up to join one of four independent Active Support Groups. Around 120 people from South Wales took up the opportunity to invest in the development of the tidal lagoon.

Regeneration

The project is considered a catalyst for regeneration in the Swansea Bay City Region, featuring prominently in the proposed Swansea Bay City Deal.

The Fabian Way Innovation Corridor Masterplan positions Swansea Bay Tidal Lagoon at the centre of the regeneration plan, while both the City and County of Swansea and Neath Port Talbot Borough Councils Local Development Plan policies focus on capturing the benefits of the project to Swansea Bay's waterfront regeneration ambitions.

It is anticipated that the tidal lagoon to become a major tourism attraction, with around 100,000 visitors per year. Visit Wales and local tourist and business groups see the lagoon as a magnet for visitors; in much the same way as the Eden Project has for Cornwall, Swansea Bay Tidal Lagoon can generate trade for existing local businesses, as well as the new ventures sited at the lagoon itself.

Recent Government Report

In the case of the TLSB evidence from the Swansea Bay City Region suggests that a tidal lagoon development could act as a "catalyst for the wider regeneration of the Swansea Bay City Region". **I think it is beyond question that, in the case of Swansea Bay, local economic regeneration would follow a tidal lagoon.** The non-energy generating Cardiff Bay Barrage (opened in 2011) was built to regenerate Cardiff waterfront and most people agree that it has had a positive impact.

However, it is also reasonable to recognise that a programme of works intended solely for the economic regeneration of, for example, the greater Swansea area would be done in a very different way and also at lower cost than the building of a tidal lagoon.

The most recent studies by Miller Research and Semta ('A study to forecast the manufacturing and labour requirements for the Swansea Bay Tidal Lagoon') and CITB and Whole Life Consultants Ltd (A study to determine the construction labour and skills demand, supply and gaps associated with the creation of the Swansea Bay Tidal Lagoon'), commissioned by the Welsh Government, estimate TLSB could create over 2,200 direct FTE jobs.

The range of employment opportunities will be far-reaching; not just in design, build and manufacturing, but also in the related services, such as tourism, recreation, recruitment, and legal and financial services. Many companies specifically expressed an interest in becoming part of the supply chain, to the Hendry Review. Specifically in the TLP document 'Ours to Own' they state over 1,000 UK businesses 'have registered an interest in supply parts and skills.

As noted above, it is clear that the Swansea Bay Tidal Lagoon presents an opportunity to provide significant economic benefits to Wales. We therefore

respectfully request that the National Development Framework supports the Tidal Lagoon and captures its benefits within clear policy wording.

Swansea City Deal

The City and County of Swansea have recently presented a report to Cabinet detailing the scope and strategy for the City Deal; this has been supported by members therefore delegating powers to the Leader of the Council to move forwards with the City Deal Agreement.

Essentially, the City Deal will involve an investment of some £1.3 billion over a period of 15 years. This consists of £241m of central government funding to be split between the two governments – on a basis to be agreed between them – plus £360m of other public sector funding and £673m of private sector contributions.

There are a range of other matters to be resolved on individual projects which the partners are working through with the UK and Welsh Governments. More widely, there are a number of other factors bearing upon the City Deal and the negotiations. These include:

- The positive outcome of the Hendry Review on Tidal Lagoons. Essentially and as noted above, this provides an endorsement of the proposed Swansea Bay Tidal Lagoon. The City Deal is not dependent upon the Lagoon; but the synergies with the renewable energy strand in the Internet Coast document are very strong;
- The need to ensure that all parts of the City region benefit from the City Deal, which includes rural areas and the Valleys;
- The need to take account of the legislative framework in Wales notably the Well-Being of Future Generations Act; and
- The need to take maximum advantage of the remaining two years or so of European Structural funds prior to Brexit.

The remit of the Swansea Bay City Region Board expires on the 31st of March 2017. It will be replaced by a Joint Committee structure, led by local authorities to secure accountability for public funds. The establishment of the Joint Committee is linked to the Welsh Government's local government reform agenda in the context of a push towards a greater regional working on economic development, transport and strategic planning.

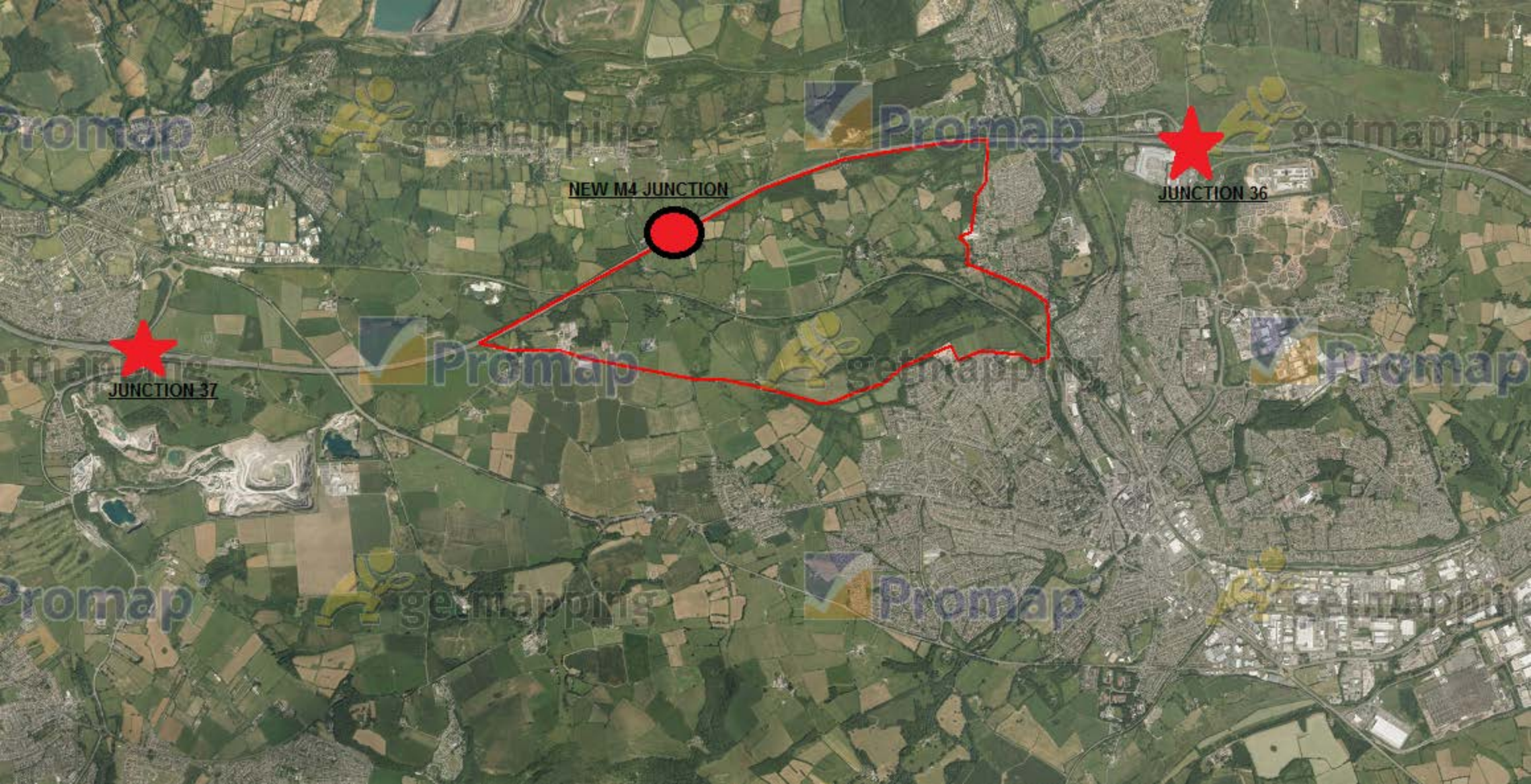
The Swansea Bay City Deal provides a clear opportunity to provide benefits to the region of West Wales as a whole. We therefore respectfully request that the National Development Framework supports the City Deal for both Cardiff and Swansea, due to the economic benefits that they will bring to Wales.

Summary of Key Issues/Conclusions

Persimmon Homes respectfully submit the points raised above for your consideration. The key points that can be drawn from our representations are detailed as follows:

- Provide a level of housing that meets the needs of Wales.
- Provide ambitious housing figures, to ensure the economy of Wales is driven forward.
- Ensure housing is delivered in a sustainable manner, in line with the Wellbeing of Future Wales Act.
- Provide a clear recognition of the economic benefit of house building.
- Support the consideration of new settlements (new towns/village gardens).
- Provide a specific link between infrastructure delivery and areas of future housing growth across Wales.
- Support the delivery of the Swansea Tidal Lagoon, which will provide jobs and drive the economy throughout Wales.
- Support the extension of the electrification of railway line and the Metro Line to Swansea.
- Support the delivery of high speed broadband in Wales.

END



NEW M4 JUNCTION

JUNCTION 36

JUNCTION 37



NEW M4 JUNCTION



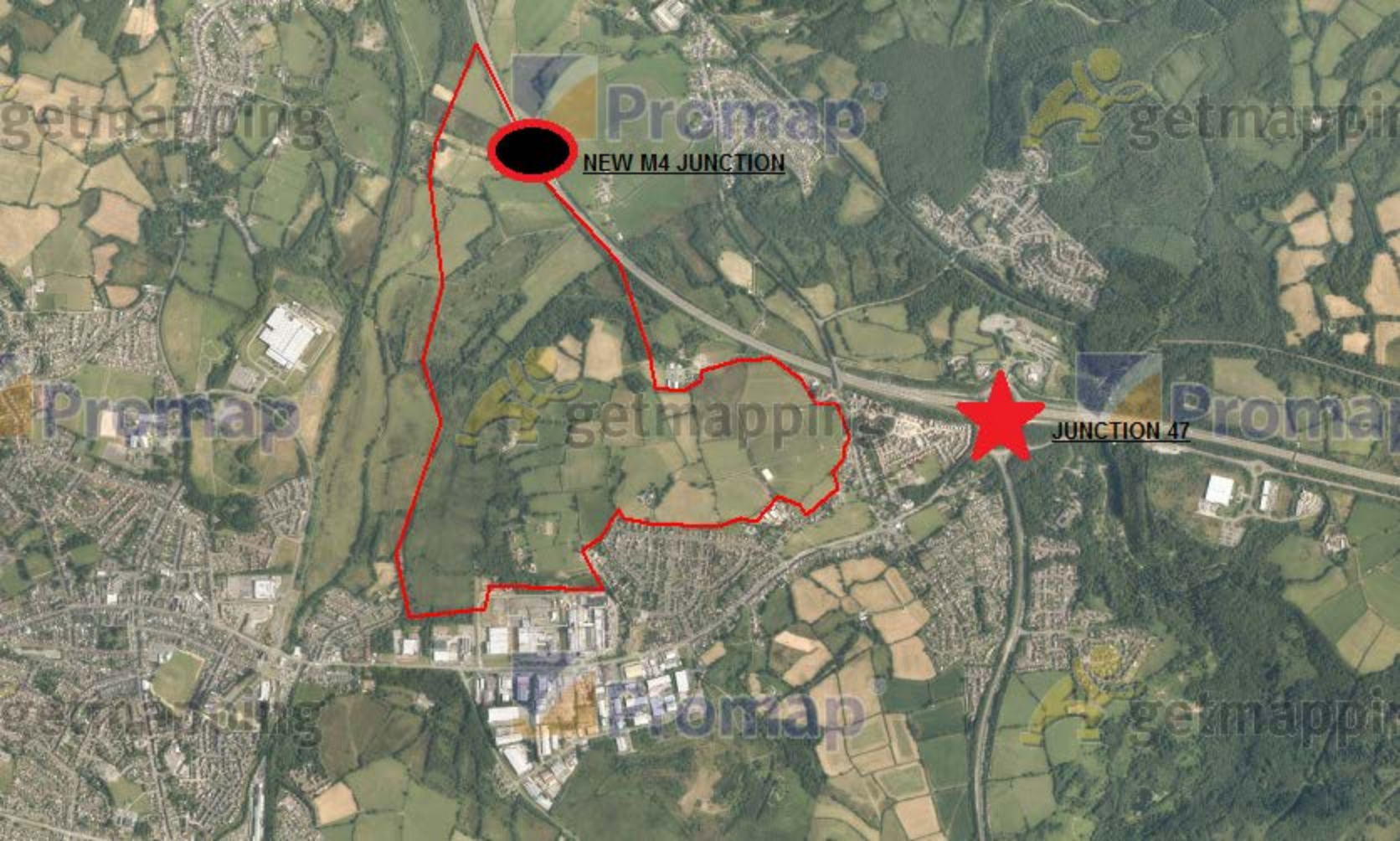
JUNCTION 38



NEW M4 JUNCTION



JUNCTION 37



NEW M4 JUNCTION



JUNCTION 47