

**Part 2 [to be submitted to local planning authority]**

18<sup>th</sup> March 2024

**1. Application Reference**

<b>Application number</b>	2023/2532/OUT
<b>Application Details</b>	Redevelopment of the former Tata steelworks site for the development of up to 150 new homes, open space, revised access points and network of internal roads and paths together with associated works. All matters, aside from the main points of access, are reserved for subsequent approval (Outline)

**2. Summary**

This briefing presents the coordinated response from key directorates/departments within Swansea Bay University Health Board to City & County of Swansea on the following planning application:-

<b>Location</b>	Former Tata Site High Street Pontarddulais Swansea
<b>Nature of development</b>	Hybrid application - residential
<b>Proposal</b>	As Above
<b>Estimation of population increase</b>  <i>[if applicable depending on the nature of the development]</i>	Unknown

### 3. Public Health and Wider Determinants of Health

Swansea Bay University Health Board has committed to becoming a population health focused organisation. We have a corporate responsibility for the health and wellbeing of our population, not only those who we see through routine or clinical practice. On 30th March 2023 our Board approved “A Better Future for All: Swansea Bays Population Health Strategy”.

In our Population Health Strategy, we advocate for systemic action on the building blocks for better health and wellbeing in the population, and reducing inequalities in health. Securing a healthy standard of living for all, including secure high-quality housing and income security, and developing healthy and sustainable places and communities are priority objectives for our joint ambition to work with partners to prevent ill health, reducing inequalities and improving health and wellbeing in our population.

Population health is strongly impacted upon through the environment, buildings, street design, natural spaces, facilities that support social networks and economic opportunities. These are known as wider determinants of health, and are influenced by planning. Substantial health inequalities exist in our communities, and planning and development plays a key role in addressing these inequalities.

This response will focus on some of these determinants in relation to this application and summarises the likely impact of the planning application on both public health issues in the immediate and surrounding areas and also the impact upon local healthcare services.

The majority of the evidence referred to in the comments below is available in the Public Health Wales resources [‘Creating healthier places and spaces for our present and future generations’](#) and [‘Planning and Enabling Healthy Environments: incorporating a template for planning policy’](#), the Public Health England resource [‘Spatial Planning for Health: an evidence resource for planning and designing healthier places’](#), and [Natural Resources Wales](#). Additional links are provided for specific sources of evidence on elements of the response.

We note that the current planning application is for access roads only. Therefore, we have provided our comments based on the information provided to date.

We note the statements on contamination in the Full Planning Statement dated October 2023, and recommend that the Full Planning Application is reviewed by the Public Health Wales Environmental Public Health Team when it is brought forward. We also note the recent planning application for “Land To The South Of Glanffrwd Road Pontarddulais” for 504 Homes and suggest that cumulative impacts of these developments should be considered, for example, in relation to management of flood risk, should both proceed.

<p><b>Green and blue spaces</b></p>	<p>The provision of green and blue spaces is important to health and well-being, and there is significant evidence, such as from the <a href="#">European Environment Agency</a>, linking contact with the natural environment with improved health and well-being.</p> <p>Green and blue spaces benefit both the environment, biodiversity and human health. They include formal and informal places for children to play, and places for adults and children to socialise and meet each other. People with good access to green spaces are more likely to be more active, and older adults can improve mobility with physical activity. Evidence indicates that undertaking physical activity in a natural setting also improves mental health outcomes more than physical activity undertaken in an indoor setting. Having access to parks and playgrounds is associated with reduced risk of obesity among young people. Furthermore, well planned green and blue spaces can support health and wellbeing through reducing the risk of flooding, keeping villages cool, dampening noise pollution and supporting wildlife. <a href="#">Natural Resources Wales / Local green spaces</a> (Jan 2024)</p> <p>Disadvantaged groups appear to gain a larger health benefit and have reduced socioeconomic-related inequalities in health when living in greener communities, so greenspace and a greener urban environment can also be used as an important tool in the drive to build a fairer society (Public Health England 2020) <a href="#">Improving access to greenspace: 2020 review (publishing.service.gov.uk)</a>.</p> <p>The City and Council of Swansea Local Development Plan states in Chapter 2 the requirements of an integrated placemaking approach that includes a green infrastructure/open spaces/ accessible, useable greenspaces and a play plan . <a href="#">Swansea Local Development Plan 2010-2025.pdf</a> (pg65)</p>
<p><b>Comment on application</b></p>	<p>Green spaces should be accessible, safe, well maintained and provide the opportunity for use by differing members of the community, from children to older people, and include people with disabilities or restricted mobility. Green spaces should also support biodiversity and act as green corridors for wildlife.</p> <p>Increasing use of good quality green space for all social groups is likely to improve health outcomes and reduce health inequalities. It can also bring other benefits such as greater community cohesion and reduced social isolation.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/sy">https://assets.publishing.service.gov.uk/government/uploads/sy</a></p>

	<p><a href="#">stem/uploads/attachment_data/file/355792/Briefing8_Green_spaces_health_inequalities.pdf</a> (Pg3)</p> <p>Within the development summary, the overarching green infrastructure and landscape strategy proposal appears inclusive for the differing needs of a diverse community and with wellbeing and health in mind. It would be beneficial to see a greater emphasis on the role of the development in also enhancing biodiversity within the green infrastructure and the steps the development will take to contribute to the nature recovery agenda.</p>
<b>Recommendations</b>	<p>In order to ensure all sections of the population can benefit from the investment in green and blue spaces we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the green spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits such as access to nature, opportunities for physical activity and recreational activities. For example, informal play opportunities for children, spaces for older adults to be physically active but also to rest and socialise, and ensuring that people with disabilities or impairments are able to access the spaces equally.</p> <p>Furthermore, to support nature recovery and biodiversity, it is recommended that the appropriate expert agencies are consulted upon, in regard of the vegetation and technology harnessed, to create green spaces so that the benefits of community wellbeing and biodiversity are maximised.</p>
<b>Walking and cycling</b>	<p>Supporting walking and cycling are crucial elements of enabling people to increase physical activity levels, and therefore benefit their health and wellbeing. Being able to be active in the areas people live, work and have leisure time is key to reducing obesity levels, increasing wellbeing, reducing stress and increasing access to work, education and leisure opportunities. Evidence demonstrates that improving the infrastructure around walking and cycling can lead to health gains including an increase in physical activity, improved mobility among children, adults and older adults, and improvements in weight status and air quality.</p> <p>The <a href="#">Active Travel Act</a> and the <a href="#">Placemaking Charter</a> in Wales both strongly advocate and provide the evidence for the need for good quality routes which are segregated from traffic, well-lit and connect to existing routes and facilities.</p>

	<p>The City and County of Swansea Policy states in Chapter 2 the requirement for active travel which includes the provision of high quality, safe, convenient and attractive cycling and walking routes, for everyday journeys, which offer good connections to services, jobs and other neighbourhoods.</p>
<p><b>Comment on application</b></p>	<p>The internal pedestrian routes within the development appear appropriate however it is unclear if they are footpaths or multi-use. It is advocated that these pedestrian and cycle routes are given due consideration, so they will link up to the wider active travel network when developed in the forthcoming years.</p> <p>The <a href="#">Active Travel Act guidance</a> should inform the design of the cycle/pedestrian pathways on-site – and should be separated.</p> <p>And, while the planning summary document states that ‘the area is well suited for walking and cycling’ a proportion of the plans are proposed and are not currently in development. The walking routes rely on the current street infrastructure and access to the cycle route network surrounding the site is limited to ‘on road’ and will be prohibitive for residents to engage with cycling as a mode of active travel for everyday activities. The active travel route improvements outlined on page 23 is a proposal for future developmental work and an aspiration for works to be undertaken within the next 10 years, subject to Welsh Government funding. It is not an indicative development at this stage.</p>
<p><b>Recommendations</b></p>	<p>Comments on what could be amended/added to improve cycling and walking e.g. providing cycle stands in safe, secure and accessible locations, separating cycle and pedestrian routes:</p> <ol style="list-style-type: none"> <li>1. Ensure due consideration for both pedestrians and cyclists, ensuring that on site development is an appropriate fit for current and the future development of the active travel network.</li> <li>2. Perhaps, harness the development’s border running alongside High Street to improve the active travel route at that location in readiness for future developments.</li> <li>3. City &amp; County of Swansea to work with the developer to improve the accessibility of surrounding site cycle paths to ensure that site specific cycle routes are meaningful network links and support active travel outside of the development site for everyday activities.</li> <li>4. We support inclusion of cycle storage for properties without garages.</li> </ol>

<p><b>Food: access to health food and the food retail environment (including hot food takeaways)</b></p>	<p>The Welsh Government (2019) <a href="#">Healthy Weight Healthy Wales Strategy</a> highlights the importance of creating healthy food environments in order to promote health and wellbeing, prevent ill health and major disease burden from overweight and obesity across the population.</p> <p>Having access to healthy food can improve health and well-being. It can support people to maintain a healthy weight and reduce their risk of developing long-term conditions. Availability of healthy food options and the access to it is important to consider with regards to health inequalities. Increased access to unhealthier food retail outlets is associated with increased weight status and unhealthy eating behaviours among children in low-income areas.</p> <p>Gardening and community allotments have numerous benefits, such as increasing physical activity, and contributing to better mental health and well-being.</p>
<p><b>Comment on application</b></p>	<p>The planning application does not include any commercial/retail premises. We note that a supermarket is within a 10 minute walk.</p> <p>Opportunities for community food growing, such as raised vegetable beds or a community garden are noted as being possible in the northern gateway and internal spine street in the Design and Access Statement which we welcome.</p> <p>The Design and Access Statement also states “Develop a management and maintenance plan that actively involves residents in the vitality of green spaces”. This is a positive aspiration but further detail is required on how this would be operationalised, funded and sustained.</p>
<p><b>Recommendations</b></p>	<ul style="list-style-type: none"> <li>• Carry out a comprehensive Health Impact Assessment which can ensure equitable opportunities for access to healthy food and food growing are maximised.</li> <li>• Recommend that the responsibility and resource allocation for the maintenance of the community gardens and growing areas is clarified in the full proposal.</li> </ul>
<p><b>Areas for play</b></p>	<p>Access to places to play is critical for all children in the development of many skills, for exercise and for mental well-being. Increased access to playgrounds and recreational facilities is associated with increased walking among young people. Areas should be provided that are both traditional play areas but also innovative flexible and natural green spaces that enable play to naturally occur. Play spaces do not need to be</p>

	<p>formal play areas to appeal to children and encourage them to be active and enjoying the outdoors.</p> <p>Policy: <a href="http://gov.wales">Wales: a play friendly country (gov.wales)</a></p>
<b>Comment on application</b>	<p>The Design and Access statement notes that an open space for natural play (including a Local Equipped Area of Play (LEAP) and a Local Area of Play (LAP) are provided in the plan.</p>
<b>Recommendations</b>	<p>In order to ensure all sections of the population can benefit from investment in play space we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the play spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits and any unintended consequences can be mitigated.</p> <p>We recommend that the needs of disabled children in the play areas are considered <a href="#">Campaigning for inclusive playgrounds   Disability charity Scope UK</a></p>

<b>Community, health and social care services provided from local facilities</b>	<p>Access to and availability of services provided in good quality, accessible local facilities promotes health and reduces inequalities in health. Having services at the centre of a walkable neighbourhood can also contribute to increasing physical activity levels, safer roads and enhanced social connectivity.</p> <p>Access to wider community assets such as education, employment and social activities are also key considerations which will support people's health and well-being.</p>
<b>Comment on application</b>	<p>We note accessibility of community facilities in the Design and Access statement.</p>
<b>Recommendations</b>	

<b>Building design</b>	<p>Well-designed buildings can improve the well-being, productivity and satisfaction of people working them, and good quality housing can help reduce respiratory conditions, improve mental health and reduce health inequalities.</p> <p>The provision of affordable housing for vulnerable groups can lead to health-related outcomes. Homes that have adequate</p>
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	kitchen facilities, cycle storage and access to outdoor spaces also contribute to overall health and well-being.
<b>Comment on application</b>	Little detail is currently provided on building design, although the Design and Access Statement does mention energy efficiency, optimising building orientations for solar gain and heat retention, meeting regulations on overheating, buildings and infrastructure with retrofit-friendly features, allowing for the integration of future energy-efficient technologies.
<b>Recommendations</b>	Further review will be made of building design when a full planning application is made.

<b>Inequities and health inequalities</b>	<p>In Swansea there is a 15-year gap in Healthy Life Expectancy between males living in the least and most deprived areas of the County Borough and an almost 20-year gap in healthy life expectancy between females living in the least and most deprived areas. (Public Health Wales, Public Health Outcomes Framework 2018-2020).</p> <p>The Swansea Bay University Health Board Population Health Strategy (2023) commits the Health Board to work in partnership to achieve the “Marmot” policy objectives in order to reduce health inequalities in our region. This includes working with partners to develop “healthy and sustainable places and communities”.</p> <p>High quality, affordable housing has major benefits for health and wellbeing. However, a report by <a href="#">Public Health Wales</a> in 2023 states that “<i>The gap between those who can and cannot afford their housing has increased over the past decade, which is driving increasing differences between the health and well-being of those who are better and worse off in Wales. Those who are unable to afford their homes often face compounding disadvantages. It can lead to people being trapped in poor quality or unsafe housing in neighbourhoods with fewer assets or amenities, or to becoming homeless or put in temporary accommodation, further worsening their health and well-being and widening existing health inequalities in Wales</i>” (Roberts and Petchey, 2024).</p> <p>In 2020, single-adult households (38,900 / 35.5% of total) and 2-person 0-children households (32,200 / 29.4%) were the most common household types in Swansea. Between 2015 and 2020, the number of single-person households increased by 2,400 (+6.6%) (Swansea PSB Wellbeing Assessment 2022).</p>
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	<p>In addition to the current levels of demand and housing need, Swansea's Local Housing Market Assessment carried out in 2019 showed that between 2018 and 2033 there will be a need of an extra 15,365 units of accommodation with 31% of these being affordable housing. Between 2018 and 2033, it is currently projected that there will be a 28% increase in population aged 65+ and a 58% increase in those aged 80+. This is due to an ageing population rather than in migration. Likewise there is a projected decline in numbers in the younger age groups due to out migration. <b>In terms of property type the greatest need will be for 1 and 2 bedroomed properties, this reflects the ageing population with many of those aged 65+ downsizing to smaller properties.</b> (Swansea PSB Wellbeing Assessment 2022).</p> <p>As of 30/9/2021 the Council's waiting list held 4,639 households: 26% were households who were homeless or threatened with homelessness; 43% were waiting list applicants with other, less severe forms of housing need; 31% were council tenants who have applied for a transfer to another property/area. Demand for social housing remains high and there is insufficient supply to fulfil the needs of all households on the waiting list. (Swansea PSB Wellbeing Assessment 2022).</p>
<p><b>Comment on application</b></p>	<p>The planning application states that it will include open market and affordable homes but no specification is made with regards to the number of affordable homes and whether this meets the LDP requirements.</p> <p>No details are given with regards to what variety of housing will be available to meet priority population housing needs as noted above.</p>
<p><b>Recommendations</b></p>	<p>It is recommended that a Health Impact Assessment be undertaken for large scale developments, as this will help assess the potential effects on the health of a population (both for those who may be living in any new development but also the existing community), and also the distribution of these effects across the population. The HIA can highlight ways in which health gain can be maximised and risks to health minimised, and it will consider the needs of the range of population groups. For advice on carrying out a HIA, visit the <a href="#">WHIASU</a> website.</p> <p>It is recommended that the development meets the requirements in the LDP for affordable housing and also for the needs identified in Swansea's Local Housing Market</p>

	Assessment for more 1 and 2 bedroomed properties and lifetime homes for older adults.
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<b>Climate Change</b>	<p>The Wellbeing of Future Generations (Wales) Act (2015) requires public bodies to think about long term impacts of decision making on the wellbeing of people and communities.</p> <p>It is recognised that climate change is a major threat to the wellbeing of people and communities in Wales and that long term adaptive action across policy areas is required to protect health and wellbeing (<a href="#">Netherwood, 2021</a> Climate Change Risk Assessment National Summary for Wales; <a href="#">Edmonds and Green, 2023</a>).</p> <p>Extract from <a href="#">Public Health Wales Climate Change in Wales: Health Impact Assessment</a> Chapter D5.1 Housing (Edmonds and Green, 2023):</p> <p>At current temperatures, one in five of the UK’s homes overheat (House of Commons Environmental Audit Committee, 2018). The impact from climate change on overheating in homes and resulting impacts on health and wellbeing, including mortality, is classed as a high magnitude risk in the UK Climate Change Risk Assessment (UK Climate Risk, 2021) (see also Section D5.4).</p> <p>A number of recent studies have modelled the impact of current and future temperatures on homes of different types in Wales (Arup, 2022; Hayles, 2022; Welsh Government, 2020b). The Arup (2022) study identified that at current temperatures around a quarter of homes in Wales have bedrooms that do not meet the criteria for overheating. Modelling in the study identified that at 2° of warming no properties would meet the bedroom overheating criteria and at 4° of warming, the majority of living areas and bedrooms did not meet the criteria. The modelling study by Hayles (2022) also finds that the majority of Welsh dwellings will experience increased incidence of summertime overheating. The least likely to overheat are pre 1919 dwellings and dwellings with solid stone walls. Dwellings built post 1990 dwellings, flats, and properties with internal wall insulation were more likely to overheat (Hayles, 2022).</p> <p>Extract from <a href="#">Public Health Wales Climate Change in Wales: Health Impact Assessment</a> Chapter D5.3 Flooding (Edmonds and Green, 2023):</p>
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	<p>Deaths and injuries can occur because of flooding, for example, from drowning, falling into fast flowing water or car accidents (Kovats and Brisley, 2021). In addition, illness can arise related to contact with contaminated water from biological or chemical sources (Kovats and Brisley, 2021).</p> <p>Flooding also impacts health and wellbeing via damage to homes, disrupted access to critical infrastructure such as power and water; access to services, education and local amenities; and can incur major economic impacts for individual, businesses and the public sector (Kovats and Brisley, 2021; Sayers et al., 2020a).</p> <p>A high-quality longitudinal study in England found that:</p> <ul style="list-style-type: none"> <li>• The risk of having probable depression, anxiety or Post-Traumatic Stress Disorder (PTSD) is approximately six times higher in people whose homes are flooded, than in those who are unaffected (Public Health England, 2017).</li> <li>• The impacts on mental health arising from flooding are associated with the depth of floodwater and length of time a home is flooded (Public Health England, 2017).</li> <li>• The percentage of people with probable depression, anxiety or PTSD was also elevated amongst those whose lives were disrupted by flooding but who did not have floodwater in the liveable part of their homes, although not to the same degree (Public Health England, 2020)</li> </ul> <p>Flooding can also cause disruption in access to essential services, including healthcare and education. Disruption to work and education was an important predictor of psychological morbidity linked to flooding (<a href="#">Public Health England, 2020</a>).</p>
<p><b>Comment on application</b></p>	<p>We note the Flood Consequences Assessment for this application and the current status of the Development Advice Map, Flood Map for Planning and TAN 15.</p> <p>The Flood Consequences Assessment identifies that “a significant portion of the site is located within Flood Zone 3 of the Flood Map for Planning for Rivers”. and “Flood Zone 3 represents areas which have a greater than a 1% Annual Exceedance Probability (AEP) chance of flooding in a given year, including climate change”. The assessment also states that “Further areas of the site are located within Flood Zone 2 of the Flood Map for Planning for Rivers. Flood Zone 2 represents areas which have a less than 1% AEP chance of</p>

	<p>flooding but a greater than a 0.1% AEP chance of flooding in a given year, including climate change”.</p> <p>This overall scheme plans to locate a highly vulnerable residential development in a Flood Zone 3. There is strong evidence of negative long-term impacts on health and wellbeing arising from flood events, along with safety issues, potential for damage to homes and economic consequences of flooding for residents and homeowners.</p> <p>As noted above, people whose lives are disrupted by flooding (even if their own homes are not flooded) experience elevated rates of mental health conditions such as anxiety and depression and among those disrupted by flooding but without floodwater in the home, disruption to work and education was an important predictor of psychological morbidity (<a href="#">Public Health England, 2020</a>).</p> <p>We note and support the commitment in the Design and Access statement for the homes to meet the new building regulations on overheating and energy efficiency.</p>
<p><b>Recommendations</b></p>	<p>Given the severity of impacts on health and wellbeing that arise from flooding, we recommend the avoidance of residential development in areas identified as being at risk of flooding. A long-term, preventative view is required in relation to locating vulnerable residential development in a Flood Zone.</p> <p>Liaison with the Local Resilience Forum on the implications for resilience and emergency planning of this residential development in a Flood Zone, and potential for cumulative impact with the other major residential planning application in the locality and ensure consultation with WAST (Ambulance).</p>

## 4. Healthcare Service Provision

The following summarises the likely impact of the planning application on healthcare service provision in the immediate and surrounding areas.

### 4.1 Primary Care

<p><b>Primary Care</b></p>	<p>The area in which the new housing is to be located comes under the remit of the Llŵchwr Cluster within Swansea Bay</p>
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	<p>University Health Board. This Cluster consists of six GP's as follows:</p> <ul style="list-style-type: none"> <li>• Estuary Group (which includes Gowerton Medical Centre, Penclawdd Health Centre and Penybryn Surgery)</li> <li>• Princess Street Surgery</li> <li>• Talybont Surgery</li> <li>• Ty'r Felin Surgery.</li> </ul> <p>At present this cluster provides care to a population of around 49,075 in the Pontardulais, Gorseinon, Gowerton and Penclawdd areas of Swansea.</p> <p>In addition to the GP's the cluster is made up of four opticians, seven dental practices, 10 pharmacies and 3 nursing homes.</p> <p>There is also a small health board owned clinic in Pontardulais providing SALT, AAA screening and Dietetics services. The Site is also an office base for the Design to Smile service.</p> <p>Within Pontardulais there is one GP Practice, this is Tal Y Bont Surgery with current practice patient numbers are circa 9461. The practice has raised continuing concerns about capacity.</p>
<p><b>Comment on application</b></p>	<p>The GP accommodation is already at capacity and car parking on the site is extremely limited. As a result, it is expected that the impact on the Tal Y Bont surgery will be significant with an increase to the population.</p> <p>Although this new development will affect Tal Y Bont Surgery primarily, all other GP's within Llchwyr cluster will be impacted particularly as there are substantial housing proposals elsewhere in the cluster area.</p>
<p><b>Recommendations</b></p>	<p>Whilst the Tal Y Bont Surgery is owned by the GP and not the Health Board, we understand the Cluster lead has raised concerns during the consultation, although these concerns are not included in any of the engagement documentation available.</p> <p><b>Recommendations:</b></p>

	<ol style="list-style-type: none"> <li>1. Engagement with the GP practice to understand the potential implications for the infrastructure of the GP practice.</li> <li>2. The design and planning of the community facility should include consideration of Health Board Services including therapy services such as speech and language and dietetics.</li> <li>3. The Health Board would support the recommendation made by SBUHB Public Health for a Health Impact Assessment to be undertaken to inform future planning of primary care services.</li> </ol>
<b>Triggers for provision</b>	N/A
<b>Costs</b>	N/A

### Community and Intermediate Care

<b>Community and Intermediate Care</b>	Additional patients within the location would have service wide implications on the Health Board, not just where the new homes are being built. There will be an increased pressure on both school nursing and health visiting due to the increase in children and young people living there.
<b>Comment on application</b>	<p>As described above an increase to the population in this area would have implications and an impact on services such as health visiting and the school nursing team. The type provision would include immunisations and school based vaccinations.</p> <p>In addition, an increase in children &amp; young people would have an impact more generally in Children Services, Child Health and Safeguarding. These services already under considerable pressure and there is a high risk that demand will outweigh capacity.</p>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken to inform future planning of primary care services.</li> </ol>

	2. The design and planning of the community facility should include consideration of Health Board Services including Health Visiting and Immunisations.
<b>Triggers for provision</b>	N/A
<b>Costs</b>	N/A

## 4.2 Secondary Care

<b>Secondary care</b>	<p>Health Board services are planned on a regional footprint, and the catchment population of Pontardulais will access the following secondary care sites:</p> <ul style="list-style-type: none"> <li>• Morrision Hospital</li> <li>• Neath Port Talbot Hospital</li> <li>• Singleton Hospital</li> </ul>
<b>Comment on application</b>	<p>It is difficult to forecast the impact this new development will have on unscheduled and planned care without further detail around the percentage split between homes likely to be occupied by local population already considered within any local modelling, and any additional pressures due to inward migration from outside of the SBUHB footprint.</p> <p>There is already significant demand on resources in all parts of the system including unscheduled &amp; emergency care and planned care. The increase in population will have an impact.</p> <p>In line with the response of the SBUHB Public Health Team more should be done to provide additional affordable housing as part of the development, and supporting the need to reduce inequalities. Homelessness is an increasing issue that is impacting on flow in our hospitals and leading to patients being retained inappropriately in health facilities in addition to impacting on patient recovery through the de-skilling and deconditioning of people so affected. A Health Impact Assessment would mitigate this risk.</p>
<b>Recommendations</b>	1. The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken understand

	<p>the population needs to inform planning of secondary care.</p> <p>2. The need to further engage with the Welsh Ambulance Service around the risk of increased demand.</p>
<b>Triggers for provision</b>	N/A
<b>Costs</b>	N/A

### 4.3 Mental Health and learning disability

<b>Mental Health and Learning Disability</b>	Health Board services are planned on a regional footprint for Mental Health and Learning Disabilities.
<b>Comment on application</b>	<p>There are no dedicated mental health and learning disability accommodation in the catchment area of Pontardulais, and the population would access services across the Health Board geographic footprint.</p> <p>The recommendations made by SBUHB Public Health Team are further validated by the West Glamorgan RPB Strategy for Emotional and Mental Wellbeing. Welsh Government Policy and supporting policies and legislative frameworks recognise that the causes and effects of poor mental health are complex and multifaceted. It goes beyond focusing on addressing the service challenges such as workforce supply and access to services and seeks to explore the wider issue of well-being of the whole population.</p> <p>Access to green and blue spaces is important to health &amp; wellbeing to encourage exercise and social interaction between all age groups. Any developments should avoid widening health inequities at all costs.</p>
<b>Recommendations</b>	The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken understand the population needs to inform planning of emotional and mental wellbeing services.
<b>Triggers for provision</b>	N/A

<b>Costs</b>	N/A
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## 5. Summary

It is disappointing that the impact on health services is not considered in this edition of the City & County of Swansea Local Development Plan, and we would strongly encourage our partners to ensure that the Health Board is involved in the next LDP update.

In summary, our recommendations are:

1. In order to ensure all sections of the population can benefit from the investment in green and blue spaces we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the green spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits such as access to nature, opportunities for physical activity and recreational activities. For example, informal play opportunities for children, spaces for older adults to be physically active but also to rest and socialise, and ensuring that people with disabilities or impairments are able to access the spaces equally.

Furthermore, to support nature recovery and biodiversity, it is recommended that the appropriate expert agencies are consulted upon, in regard of the vegetation and technology harnessed, to create green spaces so that the benefits of community wellbeing and biodiversity are maximised.

2. Comments on what could be amended/added to improve cycling and walking e.g. providing cycle stands in safe, secure and accessible locations, separating cycle and pedestrian routes:
  - a. Ensure due consideration for both pedestrians and cyclists, ensuring that on site development is an appropriate fit for current and the future development of the active travel network.
  - b. Perhaps, harness the development's border running alongside High Street to improve the active travel route at that location in readiness for future developments.
  - c. City & County of Swansea to work with the developer to improve the accessibility of surrounding site cycle paths to ensure that site specific cycle routes are meaningful network links and support active travel outside of the development site for everyday activities.
  - d. We support inclusion of cycle storage for properties without garages.

3. Carry out a comprehensive Health Impact Assessment which can ensure equitable opportunities for access to healthy food and food growing are maximised.
4. Recommend that the responsibility and resource allocation for the maintenance of the community gardens and growing areas is clarified in the full proposal.
5. In order to ensure all sections of the population can benefit from investment in play space we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the play spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits and any unintended consequences can be mitigated.

We recommend that the needs of disabled children in the play areas are considered [Campaigning for inclusive playgrounds | Disability charity Scope UK](#)

6. Further review will be made of building design when a full planning application is made.
7. It is recommended that a Health Impact Assessment be undertaken for large scale developments, as this will help assess the potential effects on the health of a population (both for those who may be living in any new development but also the existing community), and also the distribution of these effects across the population. The HIA can highlight ways in which health gain can be maximised and risks to health minimised, and it will consider the needs of the range of population groups. For advice on carrying out a HIA, visit the [WHIASU](#) website.
8. It is recommended that the development meets the requirements in the LDP for affordable housing and also for the needs identified in Swansea's Local Housing Market Assessment for more 1 and 2 bedroomed properties and lifetime homes for older adults.
9. Given the severity of impacts on health and wellbeing that arise from flooding, we recommend the avoidance of residential development in areas identified as being at risk of flooding. A long-term, preventative view is required in relation to locating vulnerable residential development in a Flood Zone.

Liaison with the Local Resilience Forum on the implications for resilience and emergency planning of this residential development in a Flood Zone, and potential for cumulative impact with the other major residential planning application in the locality and ensure consultation with WAST (Ambulance).

10. Engagement with the GP practice to understand the potential implications for the infrastructure of the GP practice
11. The design and planning of the community facility should include consideration of Health Board Services including therapy services such as speech and language and dietetics.
12. The Health Board would support the recommendation made by SBUHB Public Health for a Health Impact Assessment to be undertaken to inform future planning of primary care services, understand the population needs to inform planning of secondary care and understand the population needs to inform planning of emotional and mental wellbeing services.
13. The design and planning of the community facility should include consideration of Health Board Services including Health Visiting and Immunisations
14. The need to further engage with the Welsh Ambulance Service in relation to the risk of increase demand.

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