

GREEN WEDGE OBJECTION

The proposal to move the settlement limit of Bryncoch to include the proposed development of Bryncoch farm land and the land and on to the river Clydach is objected to for various reasons. The reasons are detailed in the following discussion but are in principle that the Inspector has not properly considered the implication of her decision and that it conflicts with the assessment undertaken by the officers of the authority. It appears to have more to do with satisfying objectors and replacing housing allocation lost in the review of Leiros Parc than with a sensible review of the facts presented by council officers.

PLANNING POLICY WALES

Para 2.6.1 States

Around towns and cities there is often the need to protect open land. Local planning authorities need to consider establishing Green Belts and making local designation, such as green wedges. *Both green belts and green wedges must be soundly based on a formal assessment of their contribution to urban form* and the location of new development and can take on a variety of spatial forms.

Para 2.6.10 states

Local designations such as green wedges may be justified where land is required to serve the same purpose to a Green Belt (see 2.6.3), but these designations do not convey the permanence of a Green Belt.

Para 2.6.3 states

The Purpose of a Green Belt is to

- prevent the coalescence of large towns and cities with other settlements
- manage urban form through controlled expansion of urban area
- assist in safeguarding the countryside from encroachment
- protect the setting of an urban area
- assist in urban regeneration by encouraging the recycling of derelict and other urban land

It seems clear that the assessment undertaken by the officers of the council, as required by para 2.6.1 above, resulted in the Final draft of the UDP issued to the Inspector, which included all of the Green Wedges and in particular the Green wedge between Bryncoch and Rhos.

TEXT OF REVISED UDP IN RELATION TO THE GREEN WEDGE JUNE 2007

Para 3.2.10 states

Green wedges are used to define areas of the countryside that may not be of particular scenic value but are particularly important in terms of protecting the form and setting of an urban area, or preventing the coalescence of settlements

Objection: In the case of Bryncoch farm, as shown in the landscape section of the dossier, the setting of Bryncoch, a relatively flat village will be degraded by building on this elevated site. The existing settlement limit of Bryncoch is less than 800m from the settlement at Fforest Goch. It is recognised that Green hedges has an unusual status but it is a far more significant community, in number terms, than Fforest Goch. The proposal to move the settlement limit of the river Clydach moves the settlement limit 400 metres towards Fforest Goch. With Green hedges included the green wedge between Bryncoch and Fforest Goch is effectively eliminated.

Para 8.3.6 states in part

The Authority has considered the need for establishing Green Belts where land would be protected for a longer period than this UDP, but considered that making local Green Wedge designations would be more appropriate. They do not convey the permanence of a Green Belt but address the need to protect the open character or landscape of those areas of countryside which are considered important in separating or forming the setting of urban areas.

Objection: In addition to the comments made under 3.2.10 it is also a matter of fact then that people choosing to buy a rural property in NPT should be made aware that the rural nature of their property may be threatened by every new plan.

Para 8.6.1 (Referring in part to Bryncoch and Rhos Green wedge states:-

The areas of countryside included in the Green Wedges are of particular importance in providing a backdrop to our main towns, or in separating and defining settlements. Although they may not necessarily be particularly attractive scenically, they contribute strongly to the quality of life in our communities. Agenda 21 and Community plan consultation exercises have demonstrated that such areas are valued highly by local residents.

Para 8.6.2 states

These areas face pressure for development and are particularly vulnerable to proposals which would normally be justified in seeking a countryside location but could have an unacceptable impact on their openness.

Para 8.6.3 states

Settlement Limits are defined on the Proposals Map to identify settlements where infilling will be allowed.

Objection: The wording of these paragraphs remains unchanged from the copy which the Inspector used. The officers of the council had diligently undertaken their assessment and for reasons clear to them had included Bryncoch farm and the land around the Dyffryn arms in the Green Wedge taking into account Agenda 21 and community plan consultation exercises. The Inspector has merely looked to where the removed development at Leiros Parc could be reallocated in the Clydach Valley – there is no real evidence to support the move.

Under Policy ENV3 – impacts on the landscape

Particular emphasis will be placed on protecting:-

- Significant skylines, views and panoramas
- Features which are important in terms of contributing to the character of the local Landscape
- Landscapes, parks and gardens which are of special historic interest

Para 8.7.1 states

Much of the County Borough's landscape is of particular interest and quality, but the Authority believes that all our countryside should, whenever possible, be protected and enhanced.

Para 8.7.3 states:-

Views and Panoramas are of particular importance to the countryside and within settlements. They contribute strongly to the sense of place of an area and can easily be degraded.

Objection: The designation of land at Bryncoch farm and movement of the settlement limit to the River Clydach conflict with the policy and the specific paragraphs above.

THE INSPECTORS INTERIM REPORT

Para 13 states:-

On other allocation sites, my principal recommendation is that the Housing Allocation H1/H13 at Leiros Park should be deleted. The recommendation is made on landscape grounds. (It follows that I also recommend against the omission objection site to the north of Leiros Park) To balance the loss of the Leiros park allocation, I recommend that the omission objection site at Bryncoch Farm should be allocated for 200 dwellings. In terms of highway impacts at Cadoxton/Penywern Road, the net effect of the alternative allocation would be neutral. I accept that little evidence was presented by the Objector in

support of this site. However it is a site which had previously been appraised by the council as an 'alternative' to Llandarcy, with favourable comment on relevant features.

Objection:- Clearly having deleted Leiros park the Inspector decides to "balance the loss" by some pretty woolly logic. The Alternative site appraisal Paras 2.10- 2.12 yield the following statements.

The land lies within the green wedge. It would form a linear extension of Bryncoch and link with the hamlet of Fforest Goch. The land is approximately 1 km from the facilities in Bryncoch. The primary schools have little spare capacity

Highway access from the A474 would be good, but the site would exacerbate traffic problems along the entrance to Neath. The distance from Neath and topography would discourage cycling and walking into the town.....

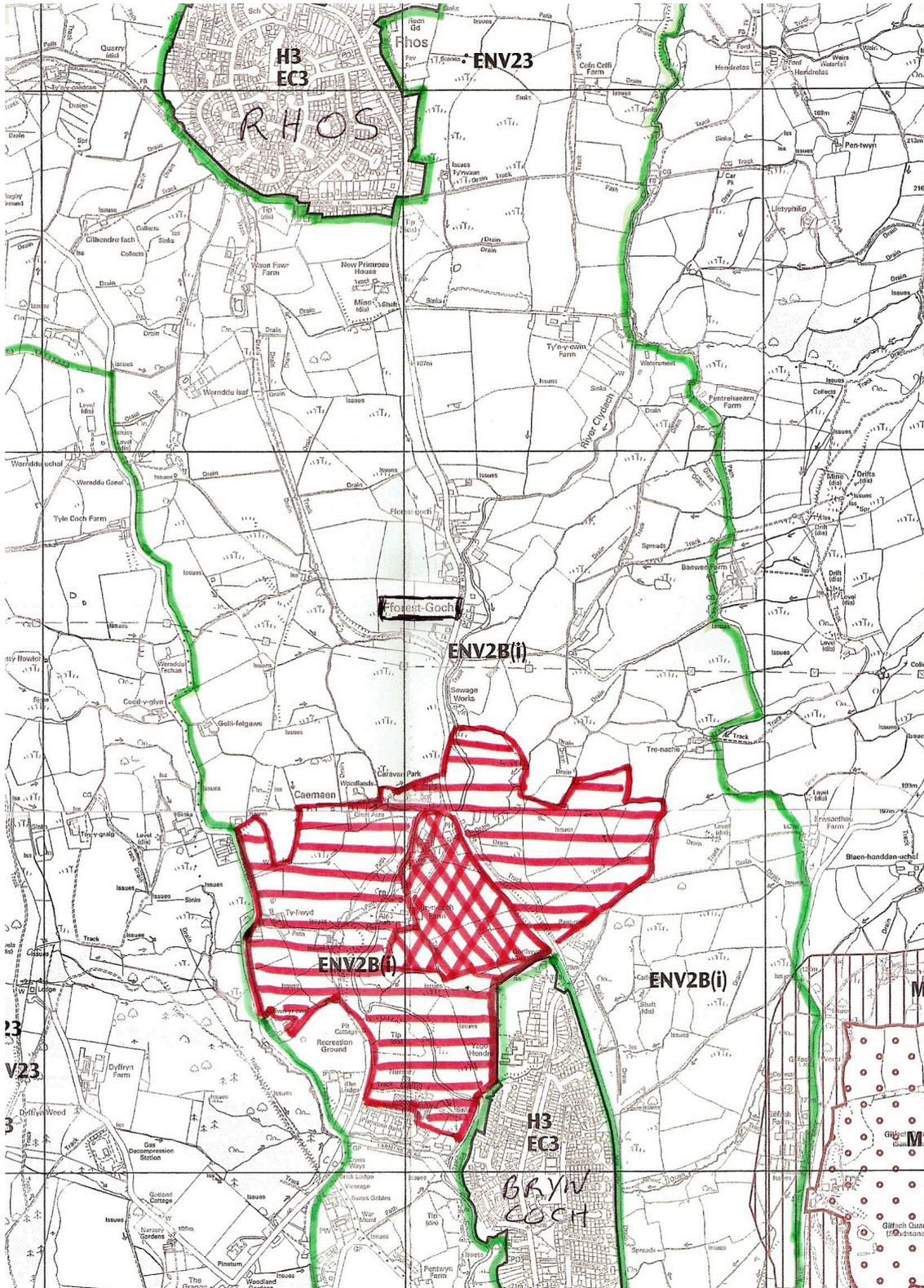
The site would have a local impact on the landscape , but would form a substantial incursion into the countryside between Bryncoch and Rhos.

Potential overall impact : negative: entirely Greenfield, located in Green Wedge,would exacerbate traffic problems on the entry to Neath

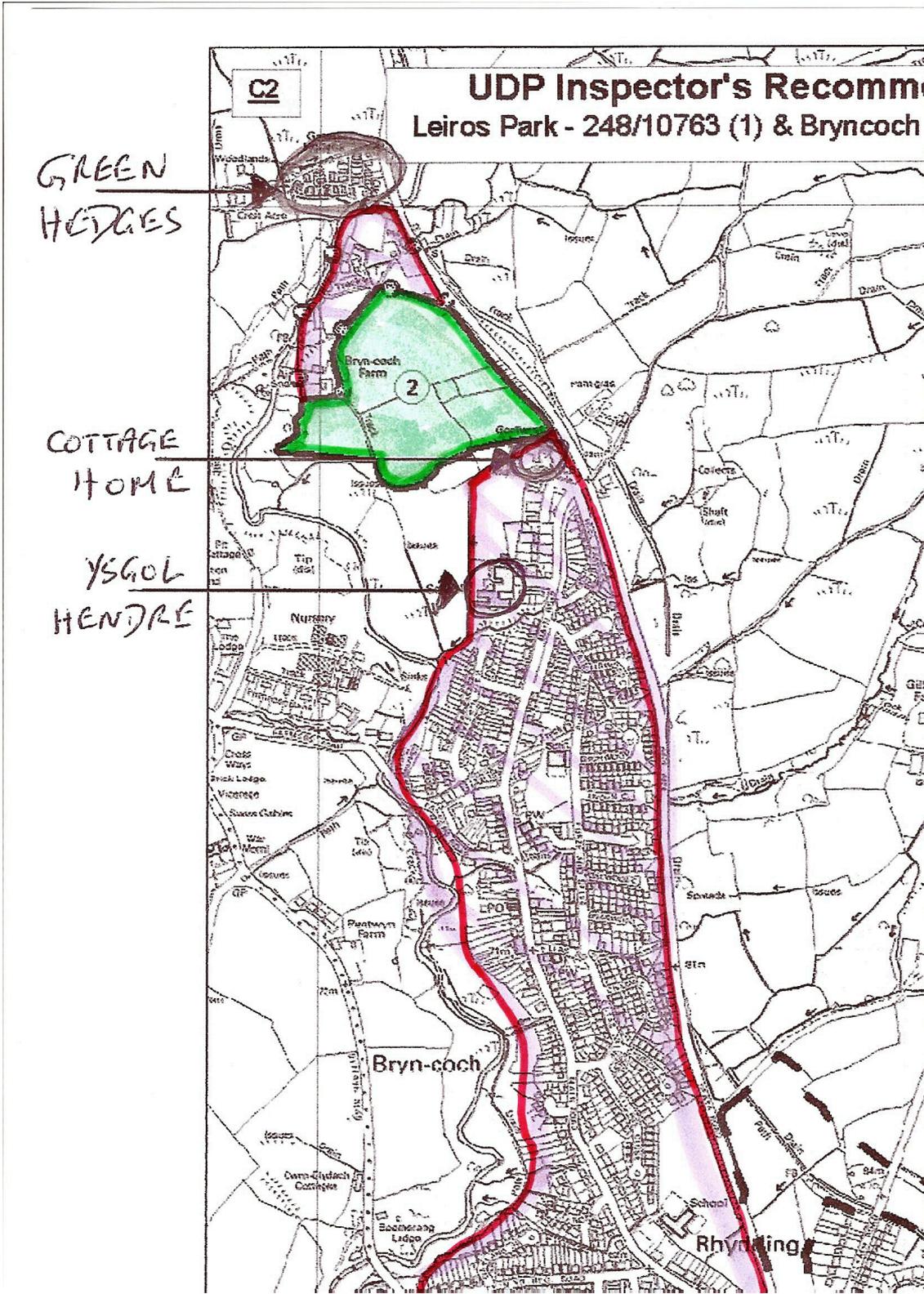
It is realised that the comments refer to a larger area –see map on following page which shows the larger area and current proposal. The comments are far from a ringing endorsement and where is the favourable comment? There is no comment on the detailed objections made by the officers of the council to the Huggard objection – but available in the objection file.

It is noted that the current proposal supplies part of the infrastructure to make the alternative site in total more attractive in the next plan.

On the page following the alternative site map there is a further map of the Inspectors proposal showing the area of proposed development and the movement of the settlement limit and the tenuous link of the site with the current settlement limit. In the report in Para 8.279 the Inspector describes the site as 17 Ha 'wrapping around' Ysgol Hendre on two sites. The published allocation has shown 8.5Ha only to be allocated and does not have a common boundary with Ysgol Hendre. In fact it only joins Bryncoch for approx 10 metres adjacent to the residential home. The proposal 'landlocks ' the protected area which will make it very difficult to manage as it needs to be grazed by cattle or horses to maintain the plant population – if not it will soon be overgrown by trees and shrub. In addition in a meeting with Owain Lewis it was confirmed that the HP gas line passes through this area and requires a 100m exclusion zone for house building and a 12m easement for maintenance access. The reality is that there is no continuity of this site with the village of Bryncoch.



**GREEN - WEDGE BOUNDARIES , RED HORIZONTAL -ALTERNATIVE SITE
 RED CROSS HATCH -CURRENT PROPOSAL**



GREEN - BOUNDARIES OF DEVELOPMENT AREA, RED- SETTLM. LIMIT

INSPECTORS COMMENTS ON THE HUGGARD OBJECTION

Page 132, of the Inspectors report is reproduced overleaf for ease of reference. Most of the issues concerning objections to the logic displayed here have been raised in earlier sections of this document.

It seems surprising, to the Layman, that the Inspector makes no comment on the detailed investigations into the individual objections raised in this objection. Each one is repudiated in detail by the relevant council departments. Far from having favourable comments, each objection is constructively demolished.

It seems totally incomprehensible, and flies in the face of natural justice, that the council officers have recommended approval of this modification when they were so virulently opposed to it when they undertook their own investigations into the Huggard objection.

INSPECTORS COMMENTS ON BRYNCOCH/FFOREST GOCH

Pages 43 and 44 of the Inspectors Report are reproduce following page132 for ease of reference.

Para 7.79

Objection: The Huggard objection included a proposal to move the settlement limit to the boundary of the farm . Mr Billett's objection involves a very minor area of land . There seems no compelling reason to move the settlement limit to the River Clydach, thereby taking 3.5Ha out of the Green Wedge.

Para 8.80

Objection: The paragraph concentrates only on the need to separate Neath from other settlements (Rhos and Alltwen). The people of Bryncoch consider themselves villagers and have already been sorely pressed in recent years by substantial additional housing development. Equally communities at Green Hedges, and Fforest Goch do not want to see their areas lost to urban sprawl. Especially when schools are under pressure and there is no employment in the area – an issue which is assessed separately under sustainability.

Bryncoch

Bryncoch Farm

248/10756,10763, Mrs E M Huggard (Bryncoch Farm) FWR
10764

Inspector's Comments

- 8.279 The objection site, measuring approximately 17 hectares, adjoins the northern settlement limit (as drafted), wrapping around the Ysgol Hendre on 2 sides, and extending northward as far as the group of dwellings centred upon the Dyffryn Arms PH. From its frontage (of about 250m) to the A474, the site rises gently to the west towards a low ridge, then falls more steeply in a wooded slope to the River Clydach. In the south and west there are areas of scrub, and in the north and east, open fields. Strong tree-lines border the road frontage and the exterior site boundaries, and also follow the majority, but not all, of the interior field boundaries, within the site.
- 8.280 Both physically and visually, the objection site is well-contained: bounded to north and south by existing built development, to the west by the river, and to the east by the A474. It is low-lying without being flood-prone. In the broad valley landscape between Neath and the watershed above Rhos, the site does not occupy a prominent position which draws the eye. The existing boundary trees would form a basis for planting which could limit the extent to which the development might be seen from the main road. The development of the site for housing would not materially harm the landscape setting of Neath, nor would it intrude harmfully into the landscape of the Clydach Valley.
- 8.281 The objection site forms part of a much larger area (with a potential for 2000 dwellings overall) which was appraised (CD127) at pre-Deposit Consultation stage, as one of 5 alternative sites in the context of the proposed Llandarcy Urban Village. That appraisal identified only *local impact on the landscape* but criticised the large site's *substantial incursion into the countryside between Bryncoch and Rhos*, and its location in the proposed Green Wedge. On its own, however, the much smaller objection site would neither extend substantially into the countryside nor leave only a minimal or ineffective Green Wedge.
- 8.282 The Appraisal of the 'alternative' Bryncoch site identified no particular ecological importance except for the hedgerows, said to be *of local ecological significance*. The Council's response to the objection identifies a *high level constraint* in the west (woodland) and south (scrub, and Purple Moor-grass and Rush Pasture) of the site, in addition to the hedgerows and tree-lines. However, if the areas of ecological interest were left undeveloped, more than half the site area would remain. An area of over 8.5 hectares would yield at least the equivalent of the 200 dwellings proposed for Leiros Park (on which it is the recommendation of this Report that the allocation be deleted).
- 8.283 The Appraisal of the 'alternative' site states that *highway access from the A474 would be good*, but identifies *traffic problems along the entrance to Neath*. However, the Council accepts that those problems (at the Cadoxton Road roundabouts) are capable of resolution to the extent of the 200 dwellings proposed for the Leiros Parc allocation site. It follows that, if the Leiros Parc allocation were not developed, 200 dwellings could be accommodated without harm to highway safety and convenience elsewhere on the approach to Neath along the A474. The Council makes no other highways objection to the Bryncoch Farm site. On balance, therefore, the objection is supported.

Recommendation

- 7.77 Similarly, given the recommendations against the inclusion within the settlement limits (Policy H3) of the Knight/Hopkins site in Neath Road, Rhos and the Pontardawe Coal and Metals site off Primrose Lane, there is no need to amend the corresponding boundary of the Green Wedge. These sites occur at points which are easily accessed on the outer perimeter of the settlement. Such points are the focus of development pressure, and existing countryside policies may not be sufficient to protect the countryside from piecemeal and poorly-defined outward spread, amounting to *uncontrolled expansion*. The objections are not supported.
- 7.78 Gwaun-Cae-Gurwen Community Council wishes the area between Rhyd-y-Fro and Cwmgors to be protected by means of Green Wedge designation. This would be a very wide-ranging area extending for several kilometres north of the Pontardawe urban area. The A474 doubtless forms a potential focus for proposals amounting to ribbon development. However, the evidence to this UDP Inquiry indicates development pressure only in a limited area immediately north of Rhyd-y-fro, and this is dealt with by excluding the land concerned from the settlement limit (see objections under Policy H3). There is no evidence of pressure on a scale that would be hard to resist through the application of normal planning policies together with the guidance of Planning Policy Wales (¶9.3.1) against ribbon development. The objection is not supported.

Bryncoch/Forest Goch

- 7.79 If the recommendation of this Report under Policy H1 is accepted, the Huggard site should be omitted from the Green Wedge, satisfying the objection. Similarly, if the recommendation made under Policy H3 is accepted, the Billett site should also be removed from the Green Wedge, satisfying the objection.
- 7.80 The area of Green Wedge designation between Rhos and Neath is extensive. Within the designated area there are many sites of objections against the Green Wedge designation. These sites are focused in 2 particular areas: firstly at Forest Goch, to either side of the A474 (Sarwed Dairy Farms, Williams, CC Davies, Johnson); and, secondly, around the existing scatter of dwellings at Dyffryn (Morris) and Ty Llwyd (Sarwed Dairy Farms, B Davies). Collectively these sites amount to a very extensive area of land, and represent development on a scale far beyond that which is needed to satisfy the housing requirement of the Plan period. The objections run parallel to objections seeking either allocation of the sites for housing under Policy H1, or inclusion of the sites within the settlement limit under Policy H3. Since it is the recommendation of this Report that none of these sites should be designated in either way for potential residential development, it follows that there is no need to omit them from the Green Wedge on those grounds.
- 7.81 The volume of objection under Policies H1 and H3 in itself indicates heavy pressure for development. Whilst the area of Green Wedge here is extensive, it is based upon the A474 and upon the network of minor roads and lanes connecting Neath, Bryncoch and the A474, and also linking through to Alltwen via the Wernddu Road. Whilst the landscape in this area is pleasant, it is unremarkable. Normal Countryside policies of the Plan, including ENV1 and ENV3 would on their own be unlikely to offer sufficient protection to withstand pressure for development. Green Wedge designation would serve to *prevent the coalescence of large towns (Neath) with other settlements (Rhos and Alltwen), manage urban form through controlled expansion, assist in safeguarding the countryside from encroachment*. Given the size of the area concerned, it would also *assist in urban regeneration by encouraging the recycling of derelict and other urban land*. This is particularly relevant given the Plan strategy to focus upon the regeneration of the former refinery site at Llandarcy. The Green Wedge would therefore accord with the purposes of Green Wedge designation as set out in Planning Policy Wales ¶2.6.3.

- 7.82 The area designated as Green Wedge extends to east and west of the River Clydach. The Clydach Valley is broad and shallow. The outer limits of the Green Wedge correspond to the break in slope beyond which the land rises more sharply and appreciably towards the upland massifs on either side. These outer limits are therefore appropriate, since they follow *clearly identifiable physical features* in the terms of Planning Policy Wales ¶2.6.12. In these circumstances, the objections are not supported.

Leiros Park

- 7.83 It is the recommendation of this Report under Policy H1 that Housing Allocation H1/13 (Leiros Park) be deleted from the Plan. Mrs M Parry Williams and others argue that the site should be included within the area designated Green Wedge. Given the location of the site on the long north-eastern edge of Neath, with potential access from the A474, the evident pressure for its development is understandable. Designation would serve to *protect the setting of an urban area*, and would *assist in safeguarding the countryside from encroachment* in the terms of Planning Policy Wales ¶2.6.3. The boundary of the site is marked by *clearly identifiable physical features* as advised at PPW ¶2.6.12. The site should therefore be accorded the additional protection of Green Wedge designation. The objections are supported.

- 7.84 Mr N Carter seeks the extension of Green Wedge designation to the area west and south of Gilfach Quarry, and north-west of Cadoxton. This area includes the site of the objection by BJ Homes seeking allocation for housing as an extension to the draft allocation at Leiros Park. It is the recommendation of this Report under Policy H1 that the 'omission' site should not be allocated for housing, nor included within the settlement limit. At the Inquiry evidence emerged that the Objector was considering future housing proposals for additional land to the south-west of Gilfach Quarry, but had not lodged an objection on that basis to the UDP currently under consideration. These 2 factors indicate that there is strong pressure for development of the area. The land is important to the setting of Neath. Some of it would be protected under normal UDP policies for development control: Policies ENV3 (landscape) and ENV5 (nature conservation, as marshy grassland). Some is included within the buffer zone for Gilfach Quarry, and would be protected under Policy M5. However, none of these policies is relevant throughout the area, and they offer only a patchwork of provision. In these circumstances, the designation of the land as Green Wedge would fulfil the purpose of Green Wedge *to protect the setting of an urban area*, as set out in Planning Policy Wales ¶2.6.3, and would accord with PPW ¶2.6.11. The objection is supported.

- 7.85 In setting the boundaries of the extended Green Wedge, account should be taken of PPW ¶2.6.12 that *clearly identifiable physical features should be used to establish defensible boundaries*. This would suggest that the Green Wedge should extend eastwards either as far as the Cwmbach Road, or to the stream somewhat further east, and that it should also extend south-westwards to cover the narrow strip of open land which forms an incursion into the settlement at that point. To the north, the Green Wedge boundary should extend to the outer perimeter track running round the southern edge of the Quarry, thus overlapping the Policy M5 buffer zone as it already does on the western side.

Neath Abbey

- 7.86 In this area the number of parallel objections made under Policy H1 and H3, seeking designations which would allow residential development, indicate strong pressure for development. It is the recommendation of this Report (see Housing Chapter) that none of the sites concerned should be allocated or otherwise designated for residential development). Here, the potential for encroachment upon existing open countryside is considerable. The Green Wedge designation takes in both the narrow and attractive lower

