

## THE BRYNCOCH FARM DEVELOPMENT

### THE INSPECTOR GOT IT WRONG

The objective of this document is to put forward what will hopefully be seen as convincing arguments so that the members can reasonably conclude that they do not have to accept the Inspector's recommendations when she said that the green wedge status hitherto attaching to the Bryncoch Farm could be removed which would lead the way for the land to be developed for about two hundred houses. On that basis the members of the Council can therefore have the confidence that they are justified in overturning any previous decision which they may have made pursuant to her recommendation.

In this document we have compared the Local Authority's unitary deposit plan with the Inspector's report, from which we have been able to:-

- a) Identify issues which have not been addressed by the Inspector.
- b) Where the Inspector has referred to certain issues, we are able to demonstrate that she has done so without knowing the facts (if she did know them, she has not recorded them in her report).
- c) Identify where the Inspector is inconsistent in her approach.

#### The Documents Considered:-

1. The Local Authority unitary deposit plan in draft form dated the 30 January 2003 – 216 pages.
2. The Inspectors report on the Local Authority's unitary development plan released in two parts:-
  - i) The housing chapter released on the 26 July 2006 (i.e one year ago).
  - ii) The transport chapter released on the 28 November 2006.
  - iii) The Inspectors report – 386 pages.
3. The modifications, additions and changes to the Local Authority's unitary development plan issued by Mr Geoff White the head of planning dated June 2007 – 283 pages.
4. The Local Authority's list of modifications and reasons for proposing the modifications issued by Mr Geoff White, head of planning dated June 2007 – 52 pages.
5. The Local Authority's list of Inspectors recommendations, the Council's decision, the Council's reasons issued by Mr Geoff White, head of planning dated June 2007 – 68 pages.
6. The Local Authority's maps on the proposals to the modification of the unitary development plan – 59 pages.
7. The Local Authority's list of recommendations made by the Inspector to the unitary development plan which the Local Authority does not intend to accept – issued by Mr Geoff White, head of planning June 2007 – 1 page.
8. The submissions by Mrs Huggard's representative, Mr Lyn Rees (Mrs Huggard being the owner of the Bryncoch Farm which is proposed to be developed) wherein she objected to the site being retained within the green wedge status i.e she opposed the

- Local Authority's original position and she wanted the land to be developed – her representatives submissions dated August 2005 – 11 pages.
9. The Local Authority's proof of evidence rejecting Mrs Huggard's representations for the land to be developed and submitting that it should remain within the green wedge status – dated the 6 October 2005 – 10 pages.
  10. Various Local Authority documents concerning matters such as the development of the Ysgol Hendre School and sewage etc.

**The Reports Commissioned or Prepared by the Bryncoch Action Committee:-**

1. The highways and traffic report.
2. The landscape report.
3. The sustainability report.
4. The strategic environmental assessment.
5. The biodiversity report.
6. The ecological report.
7. The report on the historical significance of the Bryncoch Farm (this part of the document points the way forward for the development of the site for the benefit of the community not only in Bryncoch, but at large).
9. The importance of a green wedge status.

**The Original Aim of the UDP:-**

The members are referred to the foreword to the UDP which sets out what can be described as their mission statement:-

“..... The County Borough Council is fully committed to working with our communities and partners to achieve a better quality of life .....”

The above is a quotation from Councillor Derek Vaughan at the beginning of the UDP document.

If the Local Authority continues to support the development of the Bryncoch Farm it will be undermining the fundamental principle set out in the foreword to their UDP.

**The Welsh Assembly Government & Sustainability:-**

The members are reminded that the Welsh Assembly Government set out the aim of all developments promoting the needs not only of the present, but also not compromising the ability of the future generations to meet their own needs. Developments have to be sustainable and the underlying principles of any development land should, therefore, be:-

**Paragraph 1.7 of the UDP:-**

- Puts people and the quality of life now and in the future at the centre-of concern.
- Takes a long term prospective to safe guard the interests of future generations while at the same time meeting the needs of people today.
- Respects environmental limits so that the sources are not irrecoverably depleted or the environment irreversibly damaged.
- Applies the precautionary principle.

### Neath Port Talbot County Borough Council & Sustainability:-

The underlying principles of the UDP clearly stated that:-

- Sustainability lay at the heart of the community plan.
- That the Neath & Port Talbot County Borough Council saw that they had an overriding duty to protect and improve the quality of life for everyone living in and using the areas which they would otherwise develop.
- That they should be protecting and enhancing the areas environment and making prudent use of natural resources.

### Removing the Bryncoch Farm from Green Wedge Status:-

Removing the Bryncoch Farm site from green wedge status and permitting the development of some 200 houses will not achieve any of the objectives set out above.

The development would:-

- Not create a sustainable community.
- It will have an adverse effect on the quality of life of those currently living in and near to the site.
- The housing development will undoubtedly destroy and not protect or enhance the areas environment.

The submissions in this document will show that there can be a more appropriate and prudent use of the site which would lead to a sustainable level of economic activity without having all of the adverse effects highlighted later on in this document.

The members are also reminded of their own aims:-

i) Paragraph 1.8.5 of the UDP provides that:-

“Planning Policy Wales (2002) sets out key policy objectives which reflect the emerging priorities of the Wales Spatial Plan and which should be taken into account in UDP’s when taking development control decisions:-

- Promote resource efficient settlements.
- Locate developments so as to minimise the demand for travel.
- Contribute to the protection and improvement of the environment so as to improve the quality of life and protect local and global eco systems ..... The conservation and enhancements of statutory designated areas and the biodiversity, habitats and landscapes, the conservation of the best and most versatile agricultural land and enhancement of the urban environment all need to be promoted.
- Help to ensure the conservation of the historic environment and cultural heritage, acknowledging and fostering local diversity.

### Why The Bryncoch Farm Development is Contrary to the Above:-

A housing development at the Bryncoch Farm site will be contrary to the key policy objectives set out above, in that:-

- It is not a resource – efficient settlement.
- It will not minimise land take.
- It will not minimise urban sprawl.
- It will not minimise the demand for travel, especially by private car.
- It will contribute to the destruction of the bio ecological, biodiversity and habitats.
- It will have an adverse impact on the landscape.
- It will not be conserving agricultural land.
- It will deprive the Local Authority and the community of conserving the site which has historical significance.
- It will deprive the Local Authority and the local community of developing a site of heritage.
- The Local Authority and the local community will have lost a golden opportunity to develop the site as a nature reserve, which by linking it to Alfred Russel Wallace could result in it achieving world wide recognition.

### In paragraph 4.4 of the UDP:-

This refers to the Local Authority's policies aimed at reducing the need for residents to leave the area in which they live and search for work.

The Bryncoch site development will not have any employment opportunities within it and all those who reside there will be obliged to leave it for work or to buy household essentials or for health and social needs. The impact and highways and traffic is, however, dealt in more detail at a later stage of this document.

### In paragraph 5 of the UDP:-

This sets out the various policies and these are for ease of reference repeated below. Some of key phrases have been highlighted, because it is quite clear that the only conclusion one can come to is that the development of the Bryncoch Farm would be contrary to these stated policies.

### Part 1 Policies:-

#### Environment

##### **Policy 1**

The countryside, seascapes and landscapes of Neath Port Talbot will be enhanced where appropriate and protected from proposals that would have unacceptable impacts on their character and appearance.

## **Policy 2**

Wildlife and habitats, including those within urban areas, will be enhanced where appropriate and protected from proposals that would cause unacceptable impacts. Particular emphasis will be placed on species and habitat areas that are designated as being of international or national importance.

## **Policy 5**

The area's built environment will be enhanced where appropriate and protected from proposals that would have unacceptable impacts on its character, appearance and on the quality of life.

## **Policy 6**

The County Borough's historic environment, including archaeology, ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes will be protected and proposals that would aid its preservation and enhancement will be supported.

## **Recreation and Open Space**

### **Policy 17**

Provision for sport, recreation and open spaces will be protected and enhanced by steering proposals for facilities that generate high levels of travel demand to sites in or close to town centres.

(N.B The above statements take into account the amendments proposed by the Inspector).

### **Paragraph 6.1.2 provides:-**

That sustainability is a key aim. The National Government and the Welsh Assembly Government and the Community Plan states that it embraces sustainability as a key aim. Sustainability is said to be locating new housing near employment, shopping and other facilities.

The development of the Bryncoch Farm site will not be near employment, will be distant from shops and other facilities.

### **Paragraph 6.1.3 provides:-**

One of the fundamental aims of the Local Authority plan is to maintain the 1991 level of population. The UDP states that there has been a gradual decline of the population within Neath Port Talbot County Borough Council's area since 1991. It is quite clear, however, from the UDP that the building of houses alone is not the answer to the problem of the declining population. The answer is having a sustainable programme i.e linking employment and housing. It is submitted that creating a housing development in isolation from employment is not a sustainable development and that the development, therefore, at the Bryncoch Farm is not assisting in resolving the fundamental aim of the UDP.

Chapter 8 of the UDP points out that the Borough's population based on the 2000 census shows a very slight decline – less than 1% from 1991. It further points out that the new build completions during the period 1996 – 2001 were in the urban areas of Neath Port Talbot and that there had been little residence development in the valley areas of the Upper Afan, Neath and Dulais. Although in this report we have been determined not to fall into the trap of inviting the Local Authority to develop other areas, it would appear that:-

- The decline in population is not very significant.
- Other areas are in more need of regeneration.
- The existing development will probably not attract a developer to provide social/affordable houses.

In so far as the Bryncoch Farm development is concerned, it is submitted that it will not have any major impact on addressing the issue of population decline.

**Paragraph 7 of the UDP refers:-**

- To the County Borough as a planning authority having a duty of designating any area of special and architectural or historic interest as a conservation area.

Later on in this report the historical significance of the site is set out in more detail. The land at the Bryncoch Farm seems to have altered very little in some 150 years. It is where Alfred Russel Wallace began to catalogue wildlife. The site is thought to be immediately adjacent to the Green Lane (see further information below). There is, therefore, sufficient evidence for the members of the authority to justify them, designating the Bryncoch Farm as a conservation area. The report, even in its amended form, makes it clear that any proposals for developments should not create unacceptable impact on the environment and should not fail to:-

- Respect the landscape.
- Ensure that there are no adverse effects on biodiversity and the surrounding areas.
- Should take into account the views of the local communities.
- Should ensure that there are no adverse effects on water quality.
- Should ensure there are no unacceptable hazards or inconvenience for users or highways and rights of way etc.

The development of houses at the Bryncoch Farm will have an adverse effect on the landscape. It will be demonstrated at a later stage in this report that the Inspector had not appreciated the impact that the development would have on the landscape. One needs to walk the site to appreciate from where the houses would be seen and as to what impact it would have on the rest of the Bryncoch village. A biodiversity report has been commissioned and this highlights the issues in some detail, whereas the Inspector deals with such matters in one or two short sentences. It is submitted, therefore, that she has not properly addressed the biodiversity and ecological issues or where she has done, she has done so in ignorance and come to the wrong conclusion.

The Local Authority has already had problems with sewage leaking into the Clydach river and fines have already been meted out by the courts. The creation of some 200 houses will make the existing problem worse. The cost of the infrastructure to address the issue would probably not

be sustained by 200 houses which would mean that more houses would shortly have to be built either on the same site or on land adjacent and close by to it.

**The Local Community:-**

The UDP refers to the local community being involved. The views of the local community of Bryncoch and beyond have been clearly expressed by the very large number of objection letters which have already been submitted to the Local Authority and which, we understand, now amount to \*

**Paragraph 7.6 of the UDP defines green wedge as:-**

Being areas of land which are there to protect the setting up of built up areas and to prevent urban coalescence between settlements.

**Paragraph 7.6b provides:-**

That the Bryncoch Farm site should remain within the green wedge

The UDP made it clear that green wedges were said to be of particular importance to provide as backdrop to the main towns and to separate and define settlements. It was acknowledged that such areas face pressure from developers and are particularly vulnerable to proposals which would normally be justified in seeking a countryside location, but where such a development would have an unacceptable impact on their openness permission would not be given under the original UDP.

The UDP stated that the construction of new buildings within a green wedge was inappropriate unless there was no alternative location outside the green wedge.

The impact on the character of the green wedge was to be of particular concern.

**The development of the Bryncoch site is, therefore, a major volteface on behalf of the Local Authority and although the Inspector may have recommended the Bryncoch site, the Local Authority itself has not produced any reasons as to why they should now go along with the Inspector's recommendations. In other instances they have not accepted the Inspector's recommendations. As the Local Authority had itself vigorously opposed the submissions by Mrs Huggard and those submissions still hold good, it would appear that the Local Authority is now hiding behind the Inspector's recommendations in deciding that the Bryncoch Farm site should no longer have green wedge status.**

It is accepted that the Inspector altered the definition of green wedge so that:-

Paragraph 7.73 was modified by the Inspector to read:-

“Green wedges are identified to protect the setting up of built up areas and to prevent urban coalescence between settlements. Within these areas inappropriate development will not be permitted, except in very exceptional circumstances. Apart from those forms of development which are specifically defined as appropriate, any other development which would prejudice the openness of the green wedge will be considered as inappropriate development and will not be permitted.”

In the Inspector's recommendations she gives the exceptions to the above but none of those exceptions would justify the decision for the Bryncoch Farm development to lose any green wedge status.

In the Inspector's own report she concludes that only in very exceptional circumstances would inappropriate development be allowed and then only when other considerations clearly outweigh the harm caused to the green wedge and so justify the development.

In the Inspector's report, she is not able to put forward any arguments (which could come within the definition of exceptional) and she is not able to put forward any considerations which would outweigh the harm caused to the green wedge and so justify the development.

The Inspectors report is, however, considered further in this document.

### **The Inspectors Report:-**

There were a number of objections to the UDP and the Welsh Assembly Government appointed Susan Holland NA Dip TP MRTPI as the Inspector to hold a public enquiry into the objections. As has already been pointed out, the Inspectors report was in two parts and the first part dealing with the housing issues was submitted in July 2006 and the report dealing with the transport issues was submitted in October 2006.

On page 40 of the Inspector's report, paragraph 7.7.3, she sets out her recommendations with regard to green wedges.

In her view, green wedges were to be identified as areas which would protect the setting of built up areas and to prevent urban coalescence between settlements. Within those areas inappropriate development would not be permitted except in very exceptional circumstances. Apart from those forms of development which are specifically defined as appropriate, any other development which would prejudice the openness of a green wedge would be considered as inappropriate to development and would not be permitted.

Subsequently in the report, the Inspector concludes that the Bryncoch site could be removed from green wedge status and could accommodate about 200 houses without there being any adverse effect on other parts of the site. She makes this bold statement without, however, justifying it. At no point in her report does she put forward any cogent reasons for the quantum leap which she makes with regard to the decision.

The members are referred to the Inspectors report pages 43 – 445 paragraphs 7.79 – 7.87.

The opening sentence in paragraph 7.79 reads:-

“If the recommendation of this report under policy H1 is accepted, the Huggard site should be omitted from the green wedge, satisfying the objection.”

There is no evidence prior to that sentence in paragraph 7.79 in support of that recommendation.

The next relevant part is in 7.83 when the Inspector recommends that any development of Leiros Parc is to be deleted from the plan.

She supports the arguments that Leiros Parc should be included within the area designated green wedge and she sights as her reasons:-

- i) Designation would serve to protect the setting of an urban area.
- ii) It would assist in safeguarding the countryside from encroachments.
- iii) The boundary of the site is marked by clearly identifiable physical features.
- iv) With regard to the adjacent area which was to the west and south of Gilfach Quarry on the northwest of Cadoxton, the Inspector refers to the land being important to the setting of Neath.
- v) She states that some of it would be protected under normal UDP policies for development control, because of the policies on landscape and policies on nature conservation as marshy grassland.

She states that:-

“In these circumstances the designation of the land as green wedge will fulfil the purpose of green wedge and protect the setting to an urban area as set out in planning policy Wales 2.6.3.”

In paragraph 7.85 she reiterates that land extending eastwards as far as the Cwmbach Road or to the stream somewhat further east to the settlement at that point and to the north should be green wedge.

It can be seen from the above points that no mention is made at this stage in her report of the Bryncoch Farm site and yet, in paragraph 7.87, the Inspector states that the site at the Bryncoch Farm should be omitted from green wedge and that the site which we commonly know as Leiros Parc and Gilfach Quarry should be included within green wedge.

At this point, therefore, the Inspector has not addressed any of the issues, but has merely made a recommendation without there being any foundation for it in her report.

On pages 92 – 97, it is important for the members to read why the Inspector rejects Leiros Parc as being a site for suitable development, because in each and every respect the same arguments would apply to not removing the Bryncoch Farm from green wedge.

The Inspector states in paragraph 8.66 that the Council has followed Welsh Assembly Government guidance by not designating wide tracts of land as being subject to special landscape protection, but they did include policies for the protection of particularly valuable landscape features. In this respect, the Inspector states that the UDP relied largely upon Land Map (which is a computer based landscape assessment) covering the whole of Wales.

The Land Map assessment for Leiros Parc, however, applies equally to the Clydach Valley i.e it would apply equally to the Bryncoch Farm site. The assessment identifies the area as a broad upland valley containing a mosaic area of graze land, predominantly enclosed by managed hedges.

The way in which the Inspector writes in paragraph 8.67, would appear that she is somewhat critical of the assessment in that she states that the assessment is inadequate to convey the importance of the allocation site to the landscape setting of Neath.

You will read later in this report that the Inspector does not, however, convey the same importance to the Bryncoch Farm site and yet the evidence which we have unearthed and which is set out in the supporting documents would in our view, by any objective analysis, demonstrate that the Inspector has got it plainly wrong.

In the attached reports there are photographs showing the views from the site. Houses on the site have views directly over the village of Bryncoch towards Cimla and Briton Ferry in one direction and the Swansea Valley and Brecon mountains in another direction. The houses will, therefore, make a major impact on the landscape of Neath. It is quite clear, therefore, that the Inspector has not walked the site and has not considered the height of the houses over the surrounding area. The Inspector states that the Bryncoch Farm development:-

- Will not materially harm the landscape

This is not accepted. It is quite clear that the development of the Bryncoch Farm would be in an elevated position and would be visible from many points in and around Neath.

- Will not intrude into the landscape of the Clydach Valley.

Again, this is not accepted – see the comments made above.

- Will not leave a minimal or an effective green wedge.

This is just not true. Again, the logic of the Inspector is flawed.

- The southern area of the ecological interests would be left undeveloped.

This suggests that the development will not have an adverse effect on areas which have not been developed. This is just not true – see the sections on the impact on the ecology and biodiversity. The development at one part of the site will not go hand in hand with preserving the other part of the site and protecting it ecologically etc.

The Inspector has not fully appreciated the consequences of building houses, roads, sewers etc on the land or fields close by to the areas which she is of the view can be preserved.

In paragraph 8.561 the Inspector refers back to the Leiros Parc issue. This is probably the most inconsistent paragraph in her report. The Inspector says that the Council were of the view that the traffic problems at the Pen y Wern roundabout were capable of taking 200 dwellings from Leiros Parc. It is quite clear, however, that the Inspector did not accept the Local Authority's stance and she was very sceptical about their propositions. Yet in this part of the report she concludes that if the Leiros Parc development does not go ahead a similar development could be accommodated at Bryncoch Farm. This must be wrong. If the road system cannot cope with the 200 dwellings at Leiros Parc, it will also fail to cope with the 200 dwellings from Bryncoch Farm.

In paragraph 8.72 the Inspector gives some descriptions of footpaths and hedges and concludes that building houses would materially harm the landscape. The same descriptions would equally apply to Bryncoch Farm.

The Inspector also deals with ecological issues at Leiros Parc. She refers to the area as harbouring bats and badgers. She also refers to hedge banks harbouring habitats of interest and creating corridors to areas beyond the site boundary. She states the site is bounded by woodland and marshy grassland which she describes as a "UK priority habitat".

Attached to this document are the biodiversity and ecological reports which are far more comprehensive than anything contained in the Inspector's report dealing with Leiros Parc and Bryncoch Farm. It is quite clear that the Inspector has either not addressed these issues or is ignorant of the importance of the Bryncoch Farm site.

She concludes that if houses were allocated at Leiros Parc, they would be likely to have a clear effect on the ecology of the area. The same would apply to the development at Bryncoch Farm and it is, therefore, not understood how or for what reasons she would come to the conclusion which she had in the earlier paragraphs: that Bryncoch Farm should be developed in place of Leiros Parc. As set out previously, there seems to be no logical foundation for the quantum leap which she made.

The Inspector also deals with the highway capacity, safety and convenience issues of any development at Leiros Parc.

Members will be very familiar with the A474 Pen y Wern Road. Any development at Leiros Parc or any development at Bryncoch Farm would use the same road. All of the objections, therefore, to which she refers in paragraphs 8.77 – 8.87, apply equally to any developments which would have taken place at either site.

Although there is a highway report attached to this document, the members' attention is drawn to the points made by the Inspector wherein she clearly submits (when dealing with Leiros Parc) that any proposals to try and alleviate the traffic problems between the roundabout at Pen y Wern Road and the second roundabout before the railway bridge would not alleviate any traffic problems.

The problems which she highlighted were:-

1. Vehicles travelling between Neath or the M4 and the site (we would submit whether it be the Bryncoch site or the Leiros Parc site) would have to pass through the two roundabouts at the junction of Cadoxton Road/Pen y Wern Road, and Cadoxton Road/B4434. "Traffic using the A4230 Cadoxton Road to travel to and from the A465 or Cadoxton/Cilffrew/Aberdulais or Northeastern parts of the borough would have to pass through the Cadoxton Road/Pen y Wern roundabout". (See paragraph 8.78 of the Inspector's report.)
2. The Council, she states, acknowledged that these roundabouts and the stretch of road between them are currently over capacity with consequent queuing problems at peak times.
3. She states that the Council proposes management and public transport improvements and road works, including the dualling of the stretch of road between the two roundabouts. Members attention will be drawn to the conclusions which our own enquiries have made and that this proposal will fail.

4. That the system would not be able to absorb the additional traffic for 200 dwellings.
5. The authority would not be able to provide for safety and convenience of road users.

The problems that Bryncoch Farm will create would be adding to the extra traffic which the development of the Ysgol Hendre School will be causing. This, however, is dealt with in more detail in the traffic report which is attached.

The Inspector deals with Bryncoch Farm in more detail on page 132 paragraphs 8.279 – 8.284.

In paragraph 8.280 she states that the development of the site for housing would not materially affect the landscape setting of Neath nor would it intrude harmfully into the landscape of the Clydach Valley.

This assertion is rejected. The members' attention is drawn to the photographs which are part of this document shows the impact that any development will make to the landscape. The only conclusion that one can come to is that the Inspector did not walk the fields and has not appreciated the prominence of the site and that any houses built on it would be overlooking the village and would be seen from areas well beyond Bryncoch.

The Inspector refers to the Local Authority's objections to Mrs Huggard's proposal for the site to be removed from the green wedge. Although she refers to the ecological interest of the site, she concludes that areas of each ecological interest could be left undeveloped with half the site being developed. She has clearly not received any report on the diversity and the ecological importance of the site. She has not considered whether it is viable for one half of the site to be developed and for the other half, which is not developed, to retain its ecology and biodiversity. She has completely failed to address these issues.

Another inconsistent paragraph is 8.283 which refers to the traffic problems. We have, however, already highlighted this inconsistency in her report.

#### **The Numbers Game:-**

We have deliberately refrained from identifying where 200 houses could be accommodated. We have, however, challenged the Local Authority's proposals with regard to the impact which the construction of houses at Bryncoch Farm would have on the population issue.

Furthermore, a reading of the UDP and the Inspectors report shows that there are areas in Neath Port Talbot County Borough Council which would not only accommodate some, if not all of the 200 houses, but which would probably welcome them. The Inspector refers to the lack of development in the valley areas. These communities have the necessary infrastructure in place. The houses which would be built in these areas would be more affordable. They would assist in regenerating those communities. **We have also been told that some members have said that they would welcome new builds in their areas.**

#### **The Infrastructure:-**

The present infrastructure in Bryncoch would not be able to accommodate a development of 200 houses. We, however, are of the view that the steps and costs of providing the necessary infrastructure would:-

- 1) Destroy the ecology and have a major adverse biodiversity impact.

- 2) Adversely effect the lives of those who live in Bryncoch with traffic queues at junctions, roundabouts and traffic lights etc.
- 3) Be so costly that a development of 200 houses would not justify it. The other fields in the area would probably be the next to be under pressure to be developed to make the whole project cost effective.

We have not dealt with the infrastructure issues in any detail because we are of the view that there should be no development at all. Nonetheless the cost of the infrastructure and the adverse effect it will have on those living in Bryncoch or passing along the A474 should not be ignored.

### The Thin Edge of The Wedge

In conclusion permitting the development of the Bryncoch farm for houses by removing its green wedge status is contrary to the stated policies and aims and objects of the UDP. The fact that an Inspector has made a recommendation to remove the Bryncoch farm from the green wedge does not in itself absolve their overriding duty to adhere to the principles set out in the UDP. We realise that as circumstances alter then original plans may have to be varied and adapted but removing land from green wedge is such a fundamental change of principle and it goes to the very core of their original document. We remind you again of paragraph 1.7 of the UDP:-

- Putting people and the quality of life now and in the future at the centre of their concerns
- Taking a long term prospective to safeguard the interests of future generations while at the same time meeting the needs of people today
- Respecting environmental limits so that resources are not irrecoverably depleted or the environment irreversibly damaged.
- Applying the precautionary principle

It may now be convenient to accept the Inspector's recommendation but convenience does not make it right or justify a change of heart.

A development will be detrimental to many whereas no development will give hope for the future. Why should the Victorians have the monopoly of forward thinking? Preserving the land and not developing it will be a lasting tribute to the twenty first century decision makers. Applying the precautionary principle (paragraph 1.7 of the UDP cannot be wrong. Permitting land to be built over by a developer will create a scar which will never be healed.

If the Bryncoch Farm is developed the Local Authority will not be able to deny similar applications which will follow from other land owners in the area. This development will therefore be **the thin edge of the wedge**.