

**OBJECTION TO NEATH PORT TALBOT UNITARY DEVELOPMENT PLAN STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) FOR BRYNCOCH FARM SITE APPENDIX E NEATH PORT TALBOT UNITARY DEVELOPMENT PLAN (REF ECRB-16-03-07-RGP-EN-GW).**

**Background Comments** - Taken from SEA foreword

The Strategic Environmental Assessment was undertaken to ensure compliance with the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. The SEA was published for consultation in January 2005. Following more consultation a revised SEA was agreed and published. The authority considered objections to the further suggested changes and comments on the Revised SEA in May 2005 and decided that no further changes or revisions to the SEA were required.

Comments on the Revised SEA were **not** considered at the Public Enquiry between July 2005 and August 2006 however ‘they informed the Inquiry and were quoted in a number of instances.’

The Inspectors report was received in January 2007.

NPTCBC then assessed the recommendations in the inspectors report to produce the Modifications to the plan. The assessment of the modifications concluded that a revised SEA was not required and the council resolved to advertise the findings alongside the modifications.

The SEA document was again published on March 16<sup>th</sup> 2007 and comments invited in writing.

**SPECIFIC COMMENTS ON BRYNCOCH FARM SITE APPRAISAL**

\*Numbered in accordance with the SEA document –text shown in italics.

**1. BIODIVERSITY**

***SAFEGUARD AND ENHANCE BIODIVERSITY, FLORA AND FAUNA.***

Predicted Impact ‘*some loss of foraging for birds and mammals*’

**Objection:**-species rich native hedgerows/banks Old Pastures/meadows and the pond, all identified in the report as directly impacted by the development will inevitably be lost to local wildlife immediately or with time i.e. **total loss of foraging for wildlife.**

SEA Commentary

The SEA states that “*although the site includes extensive areas of high ecological constraint, the proposed allocation focuses development in areas of lower constraint while retaining and enhancing more valuable areas.*”

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**Objection:** Parts of the site cannot be treated in isolation from others as the site as a whole is intricately environmentally balanced to maintain its present flora and fauna rich status. Fencing off the more 'sensitive areas' with subsequent loss of grazing condemns them to eventual destruction not enhancement. To intimate that some increased planting around the site in anyway makes up for this is misleading and incorrect.

Ecological surveys carried out to date by NPTCBC have only involved "walk over" inspections and the findings contradict those of an independent in depth survey carried out on the site on behalf of the Bryncoch Action Committee, which classed the fields earmarked for development as Poor Unimproved Natural Grassland and examples of Lowland Hay Meadow and Old Pasture recognised as Nationally threatened habitats and a priority classification under the UK Biodiversity Action Plan.

## **2. LANDSCAPE, TOWNSCAPE AND INDIVIDUAL FEATURES.**

### ***PROTECT CONSERVE AND ENHANCE THE QUALITY OF THE NATURAL AND BUILT LANDSCAPE AND FEATURES RETAINING LOCAL DISTINCTIVENESS***

Direct Impact: *"Loss of open fields/hedgerows/woods, limited visual intrusion due to visual containment of the site and natural topography."*

**Objection:** How does this loss 'Protect conserve and enhance the natural landscape'? GPS readings taken and photographic stills clearly detail the elevated nature of the site even at ground level in relation to the surrounding area. Although the boundary to the site along the A474 is marked by a steep embankment this falls away rapidly towards the northern point of the development where any housing would be clearly visible. Moreover entry to the site will require extensive intrusions into the embankment (the location of Badger sets) in order to achieve sufficient and safe vehicle access. This will inevitably increase the visual intrusion of the development which is in effect a satellite to the village of Bryncoch from which it will be clearly visible.

Indirect/Cumulative impacts *'Would leave an effective green wedge between Bryncoch and Rhos.'*

**Objection:** The hamlet of Fforestgoch and the mobile home settlement of Green Hedges in fact already lies between Bryncoch and Rhos. Loss of green wedge at the site effectively joins the communities.

SEA Commentary *'Development will result in the loss of natural landscape'*

**Objection:** This is in complete contradiction to 'protect and conserve'

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### **3. POLLUTION**

#### **3A. WATER**

Direct Impact *'No significant impact.'*

**Objection:** The site contour falls away to the NNW. Presumably storm water, drainage from houses and roads will follow this contour towards the environmentally sensitive River Clydach. Pollution from this source cannot be discounted as intimated by the SEA document which has no information or comments on this issue. At present under certain weather conditions, feeder streams to the river are discoloured (Lamb and Flag and Blaenhonddan School). Large scale housing development would inevitably result in more pollution entering the River Clydach.

#### **3B. AIR AND NOISE**

Direct Impact *'No significant impact'*

**Objection:** Any housing development must lead to additional air pollution unless home heating will be specified as electrical i.e. Zero carbon dioxide emissions. No mention is made on environmental impact of prolonged construction period which inevitably will have a profound and permanent effect on the flora wildlife of the site.

### **4. RESOURCES**

#### **4B. ENERGY**

Indirect/Cumulative Impact *'Walking/cycling to the shops and services in Bryncoch is unlikely to be generally feasible. Site is likely to increase private car journeys.'*

**Objection:** Increase in car use is inevitable both through the village itself and along the A474 towards Neath. Bryncoch village has limited services. There is no Doctor/Dentist /Pharmacy /library(mobile facilities only). The Bryncoch Farm site at its nearest side to the village is 1.1km from the local shop and over 4km from nearest main shopping area. The park referred to in section 8.B and mentioned in the Inspectors report is in fact the Playground area of the Dyffryn Arms public house! The playground in the village is located adjacent to the local shops a considerable distance from the development site. The nearest playing fields are several kilometres away either at the Dwr- y-Felin site/ Caewern.

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**4D. ADDRESS CLIMATE CHANGE AND FLOOD RISK.**

Direct Impact '*Main part of site not at risk of flooding*'

**Objection:** Does this mean that a part of the site *is* at risk of flooding. Given the fact that large volumes of storm water drainage from houses and roads will follow the natural contours of the site towards the river no mention is made of the risk to any properties directly downstream in lower lying sites.

**6. HEALTH AND WELLBEING.**

***IMPROVING STANDARDS OF HEALTH AND WELLBEING.***

Direct Impact '*No significant impact*'

**Objection:** The development of 200 houses on the Bryncoch farm site will bring a significant increase in the volume of traffic through the village at peak times and have a negative impact on road safety. Increased traffic means an increase in air pollution. This development will result in the detriment of standards of health and wellbeing for the people of Bryncoch.

**8. DEVELOP THE WELSH LANGUAGE AND PROVIDE COMMUNITY IDENTITY**

Direct Impact '*No significant impact*'

**Objection:** This development will only further reduce the community identity of Bryncoch village which has already seen large scale housing development in the immediate surrounding area over the last ten years.

**8B. PROTECT AND ENHANCE LEISURE, SPORTING AND CULTURAL RESOURCES**

Indirect Impact '*Close to park /playing fields.*'

**Objection:** What park and playing fields are these? This is a clear example of the lack of accuracy and thoroughness reflected in the SEA document generally. The park adjacent to the site is in fact the private play area for the Dyffryn Arms Public house. The nearest public playground is in fact situated in the village over 1.1km away. The nearest public playing fields are situated in Caewern & Dwr-y-Felin area over 4km away from the site.

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**11. SAFETY**

***DEVELOP A SAFE ENVIRONMENT***

Direct Impact *'No significant impact'*

**Objection:** With the increased traffic flow through the village this development will inevitably bring a reduction in the safe environment of Bryncoch village.

**12. TRANSPORT**

***REDUCE VEHICULAR TRIPS AND PROMOTE ALTERNATIVE MODES OF TRANSPORT***

Direct Impact *"Site is served by buses. Majority of journeys likely to be by private car"*

**Objection:** Although the site may be served by buses in this age it is inevitable that the majority of journeys in and out of the estate will be by private car. The increase in traffic through the village will be significant and this is already set to increase at peak times with the relocation of Briton ferry Special School at the Ysgol Hendre school site. The presence of a bus route (albeit rural and intermittent) is clearly an attempt to downplay the impact of increased traffic through the village and local routes to Neath centre.

**14. WORK.**

***ENSURE THAT THERE IS A VARIETY OF WORK OPPORTUNITIES AVAILABLE***

Direct impact *'The introduction of new housing should serve to support existing businesses and encourage new ones.'*

**Objection:** New businesses and an expanding manufacturing base encourage new quality housing and not vice versa

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**SEA OVERALL SUMMARY- APPRAISAL**

*'Development of the site would mean the loss of an area of countryside and the erosion of part of the gap between Bryncoch and Rhos. It is however, well screened and would have little visual effect in relation to the scale of housing provided. Biodiversity interests can be protected through careful definition of the site boundaries. Although somewhat remote from facilities the site is well served by public transport.'*

**Objection:**

**Development of the site would mean the loss of a highly ecologically sensitive area of countryside and effectively allow the coalescence of Bryncoch to Fforestgoch and Rhos. It will be poorly screened on approach from a northerly direction and have a dominant position overlooking the village of Bryncoch. The rich biodiversity of the site will be irreparably damaged and lost. The site is more than somewhat remote from facilities and is in effect a satellite development which will result in a large increase in road usage by private vehicles.**

**The SEA document is presented with large areas of information incomplete and the major environmental issues of the development not addressed in anywhere near the detail one would expect from a document of its importance and significance. It makes broad sweeping generalisations, inconsistent statements and is in parts factually incorrect. The assessment is clearly a cosmetic desktop exercise and confines itself solely to the elements defined within the 2004 regulations. There is no attempt to extend the boundary for assessment or to obtain local details relevant to the Bryncoch Farm location. This is evident from the fact that the check box for 'Further information needed' for each element is blank throughout the entire document. The document does not fulfil the objectives of a true Environmental Strategic Assessment and should be rejected as such.**