

**Nicola Gandy**

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**From:** Rob Hathaway [REDACTED]  
**Sent:** 25 October 2012 23:16  
**To:** programme.officer  
**Cc:** Helen Kennedy  
**Subject:** FW: Bridgend Local Development Plan Examination: Hearing Session 5 - Environment  
**Importance:** High  
**Attachments:** Green wedge objection Deposit Stage LDP BCBC Sept 2011.pdf

Dear Nicola

The Inspector in his Pre Inquiry Meeting advised that comments could be made in relation to the upcoming Hearings.

You will be aware of my concerns about the limited nature of the question that the Inspector has posed and my request that the test of soundness is applied to the quantitative methodology applied in the designation of the Green Wedge. My concerns are itemised in my original comments 1.1, 2.3 and 2.5 of my objections.

I am in Canada from Oct 27 2012 – Nov 15 2012 but will try and reply to any correspondence by e mail.

**Robert Hathaway BSc Hons, Dip TP, MRTPI**

[REDACTED]

[REDACTED]




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**From:** Rob Hathaway [REDACTED]  
**Sent:** 03 October 2012 16:16  
**To:** 'programme.officer'  
**Cc:** Helen Kennedy [REDACTED]  
**Subject:** RE: Bridgend Local Development Plan Examination: Hearing Session 5 - Environment  
**Importance:** High

Nicola,

The Inspector's question on the Kenfig/Mawdlam Green Wedge says

In relation to Alternative Site AS012, a Mrs Kennedy objects that the proposed ENV2(12) Green Wedge between Kenfig and Mawdlam does not meet Planning Policy Wales criteria for green wedges (1241.1).

**Qn7d. Does the Kenfig-Mawdlam green wedge accord with national**

**policy and if not, is it justified?**

I haven't a question so much as a comment. It's the same point I made when querying why the report to councillors on the LDP solely focussed on conformity with PPG Wales that I sent to Sue Jones who advised that the Inspector would consider the whole objection. Has the Inspector considered my comments 1.1, 2.3 and 2.5 of my objections? These relate to the way the council has used what appears to be arbitrary distances [so an overfocus on quantitative rather than qualitative data]. Can you please confirm?

**Robert Hathaway BSc Hons, Dip TP, MRTPI**

[Redacted]

[Redacted]



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**From:** programme.officer [Redacted]  
**Sent:** 03 October 2012 15:26  
**To:** undisclosed-recipients:  
**Subject:** Bridgend Local Development Plan Examination: Hearing Session 5 - Environment

Dear Sir/Madam,

Please find attached the Participants List and Agenda with Matters & Issues for Hearing Session 5 of the Bridgend Local Development Plan Examination.

Please note that the deadline for any responses to the questions posed in the circulated Agenda is 6<sup>th</sup> November 2012 (Noon). Further information on this matter is available in the Guidance Notes for Participants, previously circulated.

The attached documents are also available on the Examination web pages [www.bridgend.gov.uk/ldpexamination](http://www.bridgend.gov.uk/ldpexamination).

Many Thanks,  
Nicola

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# **Objection to Methodology and Designation of Green Wedge between Kenfig and Mawdlam in Deposit Local Plan – Policy ENV2 and Proposals Map.**

## **1.0 Background**

1.1. Bridgend Council proposes to designate a green wedge between the small settlements of Kenfig and Mawdlam in the west of the County Borough. The background evidence for this designation states that the reason for this designation is that the settlements are only 0.41 miles apart. There is no other reasoned justification for the designation. PPW provides the purposes for green belts in 4.7.3. None of the five criteria apply to the small settlements of Kenfig or Mawdlam or the intervening land. In the absence of reasoned and logical evidence the proposed designation is unsound.

1.2. Further reasons to object to the designation are;

1.2.1. The Council does not propose a green wedge between Kenfig and Pyle which is over virtually the same area of countryside and is only .10 mile further than the 0.41 miles between Kenfig and Mawdlam. The main arguments used to dismiss allocating a green wedge in this location similarly apply to the green wedge allocated between Kenfig and Mawdlam.

1.2.2 The area is not subject to development pressure and the area can be adequately managed through longstanding countryside policies. . The designation also does not pass the PPW test in 4.7.11 of clearly articulating why normal planning and development control policies cannot provide the necessary protection.

1.2.3. The green wedge is transversed by a gas pipeline that would limit the threat of large scale development.

1.2.4. The designation boundaries do not match the criteria set out in PPW 4.7.12 which state that ‘clearly identifiable physical features should be used to establish defensible boundaries.

1.2.5. The green wedge lies in the 2 Km buffer zone around the Kenfig Special Area of Control that affords additional protection.

## **2.0 Detailed Report**

2.1 PPW 2010 states in 4.7.1 that ‘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.’

2.2. In 4.7.3 it states out five purposes of green wedges. These are;

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

2.3. The proposed allocation of a green wedge between Kenfig and Mawdlam is not based on a qualitative assessment of the countryside between the two small settlements . It is based on the arbitrary figure of .50 mile being allocated as a 'rule' – with communities that lie closer than this figure being automatically declared green wedges unless 'site specific circumstances justified otherwise'. The possible site specific circumstances are not enumerated. The process lacks rigour and common sense and is unsound.

2.4. The proposed allocation fails to meet the five purposes and is unnecessary. At a time when planning guidance is shrinking nationally – locally it is growing with more and more unnecessary layers of protection. It fails to meet the five tests in the following way;

2.4.1. The green wedge is misapplied by seeking to separate two small settlements as designated in the settlement hierarchy. PPW guidance says that green wedges are suitable to '*prevent the coalescence of large towns and cities with other settlements*'. Kenfig and Mawdlam are defined as small settlements in the deposit plan.

2.4.2. The green wedge is not seeking to manage urban form as the villages are settlements without boundaries.

2.4.3. The green wedge would add another layer of protection to the countryside. The same argument could be applied to any area of countryside in the county.

2.4.4. The green wedge is not designed to protect the setting of the villages.

2.4.5. The land in the green wedge is not derelict.

2.5. The Council proposes a green wedge between Kenfig and Mawdlam yet does not propose a green wedge between Kenfig and Pyle which are only .10 mile or 161 metres further apart. An examination of the stage 2 analysis adopted by the Council and especially the map on page 28 shows that there is no discernible difference between the countryside allocated and not allocated. This is not reasonable, logical or defensible.

2.6. The area between the boundaries is not subject to significant development pressure and there is very little suitable road linkage or frontage that could accommodate development. There is no danger of the coalescence of settlements or any realistic likelihood of development affecting the role of the small villages in the settlement hierarchy.

2.7. The green wedge is transversed by a gas pipeline that would limit the threat of development. The approximate location of the pipeline is shown on plan A attached.

2.8 Notwithsatnding the major objection to the total designation - the boundaries do not end at logical and defensible boundaries. For example the green wedge is proposed to fall on land to the east of Heol Y Broom that does not logically contribute to preventing the coalescence of Kenfig and Mawdlam.

2.8. The green wedge lies in the 2 Km buffer zone around the Kenfig Special Area of Control that affords additional protection.

**Robert Hathaway BSc Hons, Dip TP, MRTPI**

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