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INTRODUCTION

The Local Development Plan process is new and Bridgend Town Council (BTC), although it has sought advice as to the hearing procedure and attended the pre hearing (notes of the pre hearing have been provided), it wishes to present the following observations to clarify its previous submissions which also reflect the concerns of local people. This submission relates to (1) the allocation of Green Wedge status. BTC acknowledges that this submission contains points stated in its response submission for Session 6 Island Farm Employment Site which has overlapping issues. The following observations follow the Inspector's 'Agenda with Matters and Issues' format using the Inspector's paragraph numbering and headings.

3 ENV2 GREEN WEDGE

BTC maintains that the following points clarify the submissions regarding Green Wedge allocation AS068 with the following comments. The issue of the extent of the 'settlement boundary' is referred to by the Inspector in Session 6 Island Farm Employment Site at paragraphs 1.2 Allocation Status, Qn1f, 4.1, 4.2, Qn4c and Qn4d.

Settlement Boundary

- a) The additional concern that BTC has is that HD Ltd desire to see the extension of SP9 up to the New Inn Road. The settlement boundary is considered in the LDP Policy PLA1 - Settlement Hierarchy and Urban Management and BTC considers that following LDP paragraphs are central;

3.1.18 *All settlements in the settlement hierarchy have defined settlement boundaries. These have been reviewed and amended where appropriate to accurately define the urban area from the countryside. This provides certainty and direction in terms of where appropriate development will be permitted; encouraging the re-use of land and buildings and protecting the countryside from inappropriate development that may have an adverse effect on its rural character. It also assists in the prevention of the coalescence of settlements and avoidance of urban sprawl which enables communities to operate efficiently.* ^[BTC underlining]

- b) **In addition;**

4.1.7 *The countryside, for the purposes of the LDP, is defined as land lying outside of the designated settlement boundaries (defined by Policy PLA1). A number of site specific proposals in the LDP are located outside of these boundaries. Although these allocations are located in the countryside, there would be a general presumption in favour of their development for the specific purposes of their designation, subject to satisfying other policies in the plan.*

4.1.13 *The Council acknowledges that the rigorous application of settlement boundaries as limits to urban built development, as defined in Policy PLA1, will achieve most of the aims listed above. However, the Council considers that, due to the proximity of some neighbouring settlements and/or development pressure, some areas of countryside are*

more vulnerable than others in terms of coalescence with one another. Therefore, in the LDP the overriding purpose of the Green Wedge allocations is for their primary function, namely to prevent the coalescence of settlements.

BTC is very concerned and opposed to the extension of the settlement boundary requested by HD Ltd (which includes other land in their ownership referred to in (Representor 1248 pages 1 – 5 extending to Llanerch Residential Home, Craig-y-Parcau and Ty Afon former boys home and outbuildings) in that valuable countryside used and appreciated by the citizens of Bridgend will be unnecessarily compromised.

Background Paper 4 Green Wedge Designation

Below are a number of points which BTC use to highlight support for a green wedge as outlined by IFCA in AS063 and for its own submission AS068.

- a) Background Paper 4 in its introduction uses a number of key phrases;

1.1.2 The countryside plays an important role in the County Borough and therefore requires protection in the interest of safeguarding it for its agricultural function, preserving its rural & scenic landscape, providing opportunities for recreation and tourism, and promoting biodiversity. ^[BTC underlining]

1.1.3 In addition, areas of open countryside provide a 'buffer' between settlements which allows them to function independently from one another, whilst preserving and enhancing their individual character and distinctiveness.

- b) Planning Policy Wales

2.1.4 Planning Policy Wales (PPW) also reflects the need for sustainability and the importance of 'respecting local diversity and protecting the character and cultural identity of communities'.

2.1.5 Paragraph 4.7.2 of PPW states that green wedges can:

- Provide opportunities for access to the open countryside;
- Provide opportunities for outdoor sport and outdoor recreation;
- Maintain landscape/wildlife interests
- Retain land for agriculture, forestry, and related purposes, and;
- Improve derelict land ^[BTC underlining]

2.1.6 However, their purpose is to:

- Prevent the coalescence of settlements
- Manage urban form through controlled expansion of urban areas;
- 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. ^[BTC underlining]

BTC understands the desire to achieve a 'methodical' approach to the assessment and need for a green wedge policy, however, the approach although it must have regard to various criteria such as distances misses locations which are well known to local citizens and Town & Community Councils.

The IFCA AS063 submission is a classic example which goes back to 2003 and the pre-approved UDP period when the BCBC planners had earmarked the Island Farm area south of the area now designated SP9 as a green wedge. That proposed designation only was only removed, literally at the very last minutes, through a political intervention led by the then Leader of the Council former County Councillor Cllr Jeff Jones.

In paragraph d) above BTC refers to key phrases and an additional phrase found at;

Section 3 Analysis and results – "Stage 1 Review - Distances between Settlements

3.1.1 The first stage of the assessment involved the examination of the distances between neighbouring settlements based on the assumption that the shorter the distance, the more vulnerable the boundaries are to development pressure.

3.1.2 This was undertaken through a GIS mapping exercise, measuring the shortest distance between all neighbouring urban fringes and illustrated on a traffic light theme with the colour of the arrow reflecting the distance between the settlements. Diagram 1 and Table 3 below reflect the findings. ^[BTC underlining]

BTC maintains that Section 3 aforementioned does not go far enough and is self-inhibiting and as such ignores direct and implicit threats/pressures which are well known to the Planning Department (on file) and local people.

In Settlement Boundary Paragraph 4 a) and c) above the threats and or pressures are clearly expressed, that coupled with the future A48 highway schemes especially at Broadlands Roundabout allow BTC to believe that the combination of these points are substantial enough to warrant the inclusion of both AS063 and AS068 in the LDP. BTC also believe that their inclusion would not undermine the soundness of the LDP.

BTC, therefore, maintain that AS068 is qualified to become a green wedge because the Background Paper 4: Green Wedge Designation does not fully appraise the need in that it restricts itself to a methodology that ignores one of its own criteria stated in the analysis at paragraph 3.1.1 by ignoring local vulnerability through clear evidence of historic and future development pressures to the detriment of safeguarding the countryside from encroachment and the maintenance of landscape and wildlife interests.