

Supplementary Submission

to the

Submission by Penllergaer Community Council (hitherto referred to as PCC) to the City and County of Swansea (hitherto referred to as the County) in the Matter of the Proposed Residential Allocation at Parc Mawr Farm, Penllergaer (Proposed Policy and Map Ref SD C) as Included within the Swansea Local Development Plan 2010-2025; Deposit Plan

Introduction

Penllergaer Community Council (**PCC**) require this submission to be read as being supplementary to that already presented to the City and County of Swansea (the **County**) in support of **PCC's** objection to the proposed residential allocation known as Parc Mawr Farm included in the “ Swansea Local Development Plan 2010-2025: Deposit Plan “.

This submission contains further evidence that should be read in conjunction with the case already presented in respect of the **County's** failure in respect of the following matter :

Failure to comply with national policy guidelines in managing urban forms by the means of green belts and green wedges

PCC having sought legal opinion in respect of the County's proposed policy ER3 dealing with “ Green Belt and Green Wedges”, would now advise the **County** that :

PCC has focussed its attention on the quality of the analysis in the document that seeks to justify the change in the relevant Green Wedge boundary. This document is entitled ‘Green Belt and Green Wedge Designation’ (June 2016) (“**GBGWD**”);

PCC is concerned here with the extant Llan Valley Green Wedge. Table 3 of GBGWD, under para. 4.1.4, identifies a risk of coalescence from strategic site allocation SD C as follows: “Potential coalescence with Kingsbridge to the west and Fforestfach to the south”. Table 6 then identifies that the distance between “SD C South of A4240, Penllergaer and SD H North of Waunarlwyydd/Fforestfach” as 707m. As this is less than 750m, this is in the “Green” category of settlements which are “highly vulnerable to coalescence”. In this category, “Any additional development between such settlements will significantly increase that vulnerability” and so “there is a presumption that they will become Green Belt or Green Wedge unless findings from the detailed assessment indicate otherwise, for example, if there is a major physical barrier to development between the settlements”.

The main analysis of the extant Llan Valley Green Wedge is then contained on page 26 of GBGWD. In summary, the loss of strategic site SD C to housing (and the

corresponding loss of Green Wedge land) is sought to be justified by ‘upgrading’ the level of protection given to the area between sites SD C, SD H and SD B to Green Belt (i.e. a more permanent level of protection). This is shown more clearly in the plan at Appendix 1. This proposed new area of Green Belt is reflected in Policy ER3 of the Deposit Plan.

It is considered that this planning analysis is deficient for two main reasons.

First, as **PCC** has already made clear in section 7 of its response to the LDP Preferred Strategy, the proposed loss of the land in strategic site SD C to housing is a complete *volte-face* by the **County** when compared to the case that it advanced for the extant UDP. Whilst the **County** is entitled to change its mind, it cannot ignore its previous stance. In GBGWD, instead of grappling with that previous stance as required, the **County** has overlooked it. This undermines the credibility of the planning judgment then made.

Secondly, the **County’s** logic in this part of GBGWD is questionable in any event. Its reasoning appears to be this: the land between Penllergaer and Fforestfach is highly vulnerable to coalescence; the proposed strategic site allocation SD C will greatly increase this risk; but that risk can be addressed by giving the remaining land between sites SD C and SD H more long-term protection as ‘Green Belt’ rather than ‘Green Wedge’. This reasoning cannot be reconciled with the overall approach in Stage 2 of GBGWD (section 4.2) which is claimed to be this:

1. For land that is put in the “Green” category in Table 6 (i.e. high vulnerability to coalescence), the **County** then asks (i) whether there “are any factors that would eliminate the need for a Green Belt or Green Wedge”; and (ii) “if there are any indicators of increased vulnerability to coalescence that would strengthen the need for a Green Belt or Green Wedge”. It is said that “[t]he presence or not of these features will indicate the need or otherwise for Green Belt or Green Wedges” (para. 4.2.3).
2. In this case, as there was no factor eliminating the need for a Green Wedge, and there were also “indicators of increased vulnerability to coalescence”, the land in question (which included the SD C land) was land “needing some form

of anti-coalescence protection” (para. 4.2.7). Applying the approach in GBGWD, the only question then was whether this protection should be long-term (Green Belt) or not (Green Wedge). However, instead of resolving this question, the **County** proceeded in GBGWD to reduce substantially the land that would be given any form of anti-coalescence protection. That was not consistent with the staged approach described in GBGWD, and was not otherwise justified on exceptional grounds. This further undermined the credibility of the planning judgment made on this critical issue.

These are the further arguments that **PCC** will further challenge the strategic site allocation at site SD C.

31st August 2016 .