

## **Agriculture Loss**

### **Principal points of objection .**

The proposed built housing is entirely sited on agricultural land of grade 3a of the Agricultural Land Classification, which **PPW 10** says :

*“ .... is the best and most versatile , and should be conserved as a finite resource for the future . .... considerable weight should be given to protecting such land from development because of its special importance . “ and “ should only be developed if there is an overriding need for development , and either previously developed land or land in lower agricultural grades is unavailable ..... ”*

This confirms earlier **PPW** directions that :

*Previously developed ( also referred to as brownfield ) land should , wherever possible , be used in preference to greenfield sites where it is suitable for development .”*

The Council is relying on a County wide statement made by the appointed LDP Inspectors that :

*“ the benefits of retaining the land in agricultural use would not outweigh the advantages of providing the required housing and employment development on the affected sites ... “*

The Inspectors also confirmed that :

*“ ...our report does not refer specifically to individual representations ... “*

**THE WORLD , BUT IMPORTANTLY ALSO SWANSEA , HAS CHANGED IN THE 7 YEARS SINCE THE HOUSING REQUIREMENT WAS SET, AND THE TWO YEARS SINCE THE CONCLUSION OF THE LDP EXAMINATION .**

The Council has failed to consider this as well as the specific characteristics that relate to this site. When this is done, the benefit of retaining the land in agricultural use far outweighs any advantage gained from its development for the following reasons :

Firstly, there is no question that the land in question is entirely of the best and most versatile agricultural quality .

Importantly, the loss of good quality agricultural land is not simply limited to the area contained within the development site, but includes all the land previously contained within the Bryn Dafydd farm holding, comprising of some **278 acres** . This equates to more than double the size of the development site , involving the loss of the last two working farms in Penllergaer .

This fact was never presented to the Inspector for consideration .

The development, however, relates only to housing . There is no employment use .

The housing requirement was dictated by (a) increased employment flowing from economic growth, and (b) immigration . With neither of these factors *coming into play*, there must real question marks over the LDP housing requirement .

Furthermore, the additional benefit of this site includes the role it plays in supporting national policy guidelines in managing urban forms by the means of green belts and green wedges , vehemently opposing in its inclusion in 2007 in the UDP on the grounds the role it played in (a) preventing coalescence, (b) managing urban form, (c) safeguarding the countryside and (d) protecting the setting of the urban form .

It also argued the further role it played in **assisting urban regeneration**, a role which has even greater significance today if the **Council's ambition for stimulating city centre living flowing from the Indoor Arena development** is to be realised .

Councillor Francis Davis was reported to have said :

**"It's getting more people to live back in the city," going on then to say "Swansea needs to reinvent itself, like all cities throughout the United Kingdom. Retailing has changed so therefore you've got to have the leisure attraction, people living and working in the city to make it a vibrant city."**

There is also the added advantage gained by retaining the agricultural status of the site for the role it has to play in conserving the special landscape and biodiversity of the site in accordance with national planning policy guidelines .

PPW says :

**" The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and secure enhancement**

The Council's own Well Being Plan endorses this by saying :

**" A resilient Wales – A nation that keeps and enhances a biodiverse natural environment. We have healthy functioning ecosystems that support social, economic and ecological resilience. We have the ability to adapt to change (for example climate change)."**

**When all these factors are properly taken into consider, the balance changes .**

