Dear Sir/Madam

**CARDIFF LOCAL DEVELOPMENT PLAN – MATTERS ARISING CHANGES CASTELL COCH GOLF CLUB, TONGWYNLAIS – MR J LLEWELLYN (REPRESENTOR NO. 2787)**

With reference to the Cardiff Local Development Plan Examination, and specifically in relation to Hearing Session 12 “Green Belt and Settlement Boundaries” (6th February 2015) and Action Point 2 of that Hearing Session in relation to Green Belts, please find below a response to the Matters Arising consultation insofar as it relates to the above topic and Castell Coch Golf Club, Tongwynlais in particular. This consultation response is made on behalf of Mr J Llewellyn (Representor No. 2787), who owns and controls Castell Coch Golf Club.

Inspectors requested at Hearing Session 12 that the Council provided further details in relation to five specific points regarding the proposed Green Belt designation in the Cardiff LDP. It is not considered necessary to repeat them here, but they are appended to this response for completeness. The Council replied to the Inspectors’ questions in April 2015, and this is also appended to this response.

Whilst we do not wish to repeat matters previously raised by ourselves and other parties in relation to the proposed Green Belt designation, we have serious concerns regarding the Council’s response to the Inspectors’ questions, and these are summarised below:

- The questions have not been fully answered, but instead Background Technical Paper No. 3 ‘Green Belt’ (September 2013) has simply been regurgitated;
- The Green Belt tests set out in paragraph 4.8.3 of Planning Policy Wales (PPW) (7th Edition, July 2014) continue to be misapplied – i.e. all 5 tests need to be met for all elements of an area to be considered as Green Belt; there is no mention in any documentation provided by the Council to date in relation to ‘preventing coalescence’ between Cardiff and Caerphilly specifically as such references refer to Cardiff and Newport only;
- Paragraph 37 of the Council’s April 2015 response erroneously states that “...the primary reason for Green Belt designation is to protect the setting of the urban area...”. This is not the case as paragraph 4.8.3 of PPW does not allocate extra weight to any of the five tests, with paragraph 4.8.5 stating that “The most important attributes of Green Belts are their permanence and their openness.”;
With specific regard to Castell Coch Golf Club, the Council states in paragraph 17 of its own April 2015 response (with reference to the Atlantic Consultants Landscape Study (May 1999) which has largely informed the Council’s decision to propose Green Belt) that the Landscape Study identified negative attributes to the landscape character areas which included “disruption of landscape pattern and character by golf course development”, often describing such developments as “artificial or man-made landscapes” with “low landscape value”. It therefore runs counter to this to include Castell Coch Golf Club within the Green Belt (together with the other matters raised in our previous LDP representations). Whilst it is acknowledged that Green Belts are not landscape-based designations, the Council is relying very heavily on the 1999 Landscape Study (evidenced by the Council's April 2015 response and the fact that the Council states that ‘setting’ is the primary reason for Green Belt designation). It therefore appears that the Council is being selective in the use of its own evidence by not excluding Castell Coch Golf Club from the proposed Green Belt designation;

Paragraph 22 'Fforest Fawr and Caerphilly Ridge' of the Council’s response, quoting the 1999 Landscape Study, states that much of this landscape character area is a “highly distinctive and prominent landscape feature within the county. It is visible from much of the city and surrounding countryside…..”. It is acknowledged that much of the Fforest Fawr and Caerphilly Ridge landscape character area is visible, but again Castell Coch Golf Club is not, as set out within our previous LDP representations and as such it is not visible amongst the urban backdrop. Again, it appears that the Council is being selective in the use of its own evidence by not excluding Castell Coch Golf Club from the proposed Green Belt designation; and

Given the above (and other points previously raised by Barton Willmore through the LDP process), the inclusion of Castell Coch Golf Club within the proposed Green Belt has not been properly considered. There are clear anomalies in the drafting of the Green Belt in this vicinity given that some properties on Castle Road are in the Green Belt and some adjacent properties are not; this is contrary to what the Council asserts in paragraph 24 of its response where it states that the Green Belt boundaries are “formed by strong, logical and well-defined features”. This is further evidence that the proposed Green Belt designation has been applied in a ‘blanket’ approach as opposed to undertaking a full and proper assessment; in other words it is not based upon ‘robust and credible evidence’ in accordance with Tests of Soundness C2 and CE2.

In summary, it is not considered that the Council has adequately responded to the questions raised by Inspectors at Hearing Session 12 on the 6th February. Consequently, there remain serious concerns that the tests for Green Belts as set out in PPW continue to be misapplied and that the proposed designation of Green Belt is inappropriate, with particular regard to Castell Coch Golf Club, Tongwynlais.

Therefore, it is considered that Green Belts need to be considered at a further Hearing Session and we reserve the right to comment further and attend the Hearing Session on behalf of Mr J Llewellyn.

Yours faithfully,

Pete Sulley
Associate

Enc.

cc Tracey Smith, LDP Programme Officer
Mr J Llewellyn
Matters Arising Changes Representation Form

As part of the Examination into the Cardiff Local Development Plan (LDP) a number of Matters Arising Changes have been proposed to the LDP. These changes are set out in the Matters Arising Changes Schedule. This is your opportunity to comment on the Matters Arising Changes. All comments previously made at Deposit stage have already been considered by the inspectors and so this form should only be used to comment on the Matters Arising Changes.

All completed forms should be returned by midnight on 23rd July 2015 to: LDP Team, Room 131, City Hall, Cardiff, CF10 3ND, or email LDP@Cardiff.gov.uk

Also available for comment are the Sustainability Appraisal and Habitats Regulations Assessment of the Matters Arising Changes at www.cardiff.gov.uk.

PART 1: Contact details

<table>
<thead>
<tr>
<th>Your/ your Client’s details</th>
<th>Agent’s details (if relevant)</th>
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<tbody>
<tr>
<td>Title:</td>
<td>Mr</td>
</tr>
<tr>
<td>Name:</td>
<td>J Llewellyn</td>
</tr>
<tr>
<td>Job title: (where relevant)</td>
<td>Planning Associate</td>
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<tr>
<td>Organisation: (where relevant)</td>
<td>c/o Barton Willmore</td>
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<tr>
<td>Address:</td>
<td>Barton Willmore</td>
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<td>Greyfriars House</td>
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<td>Greyfriars Road</td>
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<td>CF10 3AL</td>
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<tr>
<td>Telephone no:</td>
<td>029 2066 0910</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:pete.sulley@bartonwillmore.co.uk">pete.sulley@bartonwillmore.co.uk</a></td>
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Please note that all representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection we will remove personal details from publically accessible documents.

Signed: [Redacted] Date: 22nd July 2015
PART 2: Commenting on Matters Arising Changes

<table>
<thead>
<tr>
<th>Matters Arising Changes reference (e.g. MAC 1)</th>
<th>Support/Object (Delete as appropriate)</th>
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<tbody>
<tr>
<td>MAC4........................................</td>
<td>Support/Object (Delete as appropriate)</td>
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<td>MAC75........................................</td>
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If you are objecting to a change it would be helpful if you could indicate which Test of Soundness you consider it to fails (Please refer to guidance note).

C2 and CE2

Please note if you do not identify a test it will not mean your comments will not be considered.

PART 3: Your Response

Your comments should be set out in full and relate to the Matters Arising Changes only.

Please use the space provided to set out your representation. Please be explicit as to which 'matters arising change' your comments relate to.

We object to Matters Arising Changes MAC4 and MAC75 insofar as they relate to the continued proposed Green Belt designation within the LDP. The Green Belt designation place unnecessary and overly restrictive burdens on the deliverability of Policy KP1 (MAC4) and, by extension, the outcome of Monitoring and Implementation (MAC75) in terms of housing delivery and development within a Green Belt.

Please see attached letter for further information.
PART 4: What Happens Next?

All comments received by the closing date will be forwarded directly to the Inspectors for consideration; noting that they will not receive a response from the Council. Should the Inspectors decide that further hearing sessions are necessary please indicate whether you would want to speak at a session. It is important to note that written comments will be given the same weight by the Inspectors as those made verbally at a hearing session.

4a) Do you want your comments to be considered by ‘written representations’ or do you want to speak at a hearing session?

(Please tick ✓ one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector. ☐

I do want to speak at a hearing session. ✓

4b) If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing

MAC4 and MAC75, insofar as they relate to the continued proposed Green Belt designation

The Matters Arising Changes Schedule is available on the Council website at: www.cardiff.gov.uk Hard copies are also available for public inspection during the consultation period at: City Hall, Cathays Park and County Hall, Atlantic Wharf, Monday to Friday between 9.00am and 4.00pm. They will also be made available at all local libraries.
Additional Assistance

If you require assistance to complete the form or have any questions relating to your representation please contact:

LDP Team,
Strategic Planning – Policy
Cardiff Council
Room 131
City Hall
Cathays Park
Cardiff
CF10 3ND

Telephone: 029 2087 1297
E-mail: LDP@cardiff.gov.uk

Tests of Soundness

<table>
<thead>
<tr>
<th>Procedural Tests</th>
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<tbody>
<tr>
<td>P1</td>
<td>It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.</td>
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<tr>
<td>P2</td>
<td>The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</td>
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<th>Consistency Tests</th>
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<tr>
<td>C1</td>
<td>It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.</td>
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<tr>
<td>C2</td>
<td>It has regard to national strategy.</td>
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<tr>
<td>C3</td>
<td>It has regard to the Wales Spatial Plan.</td>
</tr>
<tr>
<td>C4</td>
<td>It has regard to the relevant community strategy/ies (and National Park Management Plan).</td>
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<th>Coherence and Effectiveness Tests</th>
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<tr>
<td>CE1</td>
<td>The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.</td>
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<tr>
<td>CE2</td>
<td>The strategy, policies, and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.</td>
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<td>CE3</td>
<td>There are clear mechanisms for implementation and monitoring.</td>
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<td>CE4</td>
<td>It is reasonably flexible to enable it to deal with changing circumstances.</td>
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Cardiff Local Development Plan
2006-2026

City of Cardiff Council Response

Action Point 2 of Hearing Session 12

April 2015
Strategic Planning
City of Cardiff Council
County Hall
Atlantic Wharf
Cardiff CF10 4UW
Cardiff Local Development Plan 2006 – 2026

Statement in response to Action Point 2 of Hearing Session 12: Green Belt and Settlement Boundary

Introduction

1. An Action Point has arisen from Hearing Session 12: Green Belt and Settlement Boundary relating to Policy KP 3 (A) Green Belt.

   The Inspectors have asked the Council to provide further information to justify the Green Belt in Cardiff.

2. The Action point is worded as follows:

   **Action Point 2, Hearing Session 12:** Council to provide further justification to demonstrate the proposed Green Belt Policy in accordance with the requirements of Planning Policy Wales (PPW), including:

   - whether the proposed Green Belt is necessary in light of paragraph 4.8.3;
   - why normal planning and development management policies are not considered to provide necessary protection, including the settlement boundary approach which in itself would have a presumption against inappropriate development, general countryside policies, landscape and SLA policies, ecological/biodiversity policies etc (para 4.8.6);
   - whether the concept of openness (para 4.8.5) is applicable to the whole area proposed as Green Belt, particularly in terms of its topography and landscape character;
   - whether the assertions submitted in relation to the cumulative harm caused by incremental developments could be substantiated, particularly in light of the types of development that would not be considered inappropriate development in a Green Belt in accordance with paragraphs 4.8.14 – 4.8.18; and
   - whether the permanence of a Green Belt beyond the Plan period can be justified, particularly in light of the forthcoming strategic approach to planning in South East Wales and the need to ensure that a sufficient range and choice of land is available which is suitably located, bearing in mind the longer term need for development land, the effects of development pressures beyond the proposed Green Belt and the need to minimise the demand for travel (as set out in para 4.8.8).

Council Response

Whether the proposed Green Belt is necessary in light of paragraph 4.8.3

3. Paragraph 4.8.3 of Planning Policy Wales sets out the criteria for designating a Green Belt and reads:
"The purpose of a Green Belt is to:

- prevent the coalescence of large towns 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".

4. The purpose of designating a Green Belt for Cardiff is considered to be in accordance with the criteria set out in Planning Policy Wales in that the primary purpose of the designation in Cardiff is to strategically manage urban form to provide long term protection to the countryside which forms an important setting to the urban area.

5. Cardiff has experienced significant development pressure which continues to place increasing pressure on undeveloped land within the county. The Plan proposes some significant Greenfield releases, therefore the designation provides the longer term certainty and an effective balance to protect the setting of the urban area and set out a long term strategy to manage urban form through controlled expansion avoiding Cardiff's distinctive green backdrop.

6. It is considered that the designation of a Green Belt will assist in the management of future urban growth and form by restricting expansion into areas considered to be important to the setting of the city. The designated area forms land north of the M4 in Cardiff and unquestionably forms a distinctive, prominent and well known green backdrop to the city, forming a strategically important setting to the urban area.

7. In order to demonstrate that the proposed designated Green Belt relates to a geographic area genuinely befitting of, 'the setting' of the urban area, reference is made in the following paragraphs to the Landscape Study of Cardiff undertaken by Atlantic Consultants in May 1999. The extracts describe the numerous landscape character areas which largely compile proposed Green Belt area and underline how important this land is to the setting of the city.

Garth Hill - North Eastern element of Green Belt West of Taff Gorge: "The Garth Hill uplands form a prominent and distinctive landscape unit in the extreme north-west of the County. Strategically, Garth Hill forms part of the dramatic backdrop of encircling hills to the north of the city which are interrupted by the impressive gorge of the River Taff. It is, therefore, a significant component in the wider landscape setting of the city."
Pentyrch Ridges and Valleys- South eastern element of Green Belt West of Taff Gorge: “Although lower-lying than the steep uplands of Garth Hill to the north, the area also forms part of the backdrop of encircling hills to the north of Cardiff and is, therefore, an important component of the wider landscape setting of the city”

Fforest-Fawr and Caerphilly Ridge- Northern element of Green Belt East of Taff Gorge: “Strategically, the area forms part of the prominent and dramatic backdrop of encircling hills to the north of Cardiff and is, therefore, a very important component of the wider landscape setting of the city...The dramatic hills and scarp which dominate the landscape of this area form a prominent and distinctive backdrop for the city of Cardiff and are of exceptional landscape significance”.

Caerphilly Ridge Foothills- Southern element of Green Belt East of Taff Gorge: “Strategically, the area forms the lower part of the backdrop of encircling hills and ridges to the north of Cardiff and is, therefore, an important component of the wider landscape setting of the city.”

Landscape Overview: “The City of Cardiff is set in a low coastal basin surrounded by encircling hills which provide a dominant backcloth and a strong sense of enclosure and which are visible from many parts of the city. Although the proportion of built development exceeds that of rural countryside, the frequent views of the farmed and wooded hillsides provide a sense of cohesion between city and countryside”.

8. Overall, the case for long term Green Belt designation to protect the setting of the urban area in full accordance with national guidance is compelling. This case is backed by evidence confirming the hugely significant asset Cardiff currently possesses in terms of its backdrop, an asset also recognised by the public who have at each stage of the LDP process expressed strong support for the Green Belt.

**Why normal planning and development management policies are not considered to provide necessary protection, including the settlement boundary approach which in itself would have a presumption against inappropriate development, general countryside policies, landscape and SLA policies, ecological/biodiversity policies etc (para 4.8.6);**

9. Paragraph 4.8.6 of Planning Guidance requires local planning authorities to demonstrate why normal planning and development management polices do not provide sufficient protection.

10. In accordance with national guidance the Plan and the Technical Background Paper 3 Green Belts demonstrates why general countryside protection
policies, landscape protection policies or other policy mechanisms such as Green Wedge designations alone do not provide the necessary long term protection to maintain the openness of these areas of countryside important to the setting of the city or effectively manage urban form.

11. Whilst Policy KP3(B), Policy EN1, and EN3 and the ecological/biodiversity policies provide protection against inappropriate development they do not provide the longer term protection afforded by Green Belt designation which is essential to ensure the longer term protection of this important area of the city.

12. In addition, it should be noted that policies and designations based on intrinsic qualities such as biodiversity and landscape interests, do not relate to the whole area covered by the proposed Green Belt designated area. For example, approximately 50% of the proposed Green Belt area East of Taff Gorge is not covered by Special Landscape Area designation. Similarly, designated sites of biodiversity importance do not extend across the whole area and would be unable to prevent an erosion of the openness of the area.

13. An assessment of Planning Applications since 2000 covering the areas identified for Green Belt designation reveal that there has been a marked increase in the number of approved applications for single dwellings and residential development applications despite the normal planning and development management policies being in place. Over half of the total approved residential development and single dwelling applications between 2000 and 2014 occurred between 2010 and 2014. Thus showing that in both real and proportional terms the total number of planning refusals has decreased in relation to not only the last 5 years in relation to both the previous 5 (during the end of the boom and the worst period of recession), but also the 5 years before that (during the economic boom).

14. Since 2010, 77.6% of the total number of dwelling and residential applications were given planning permission suggesting an increased desire to develop/build and increased development pressures; and consequently a greater flexibility of existing policies to allow these proposals to be approved.

15. The Green Belt designation together with its associated policy to strictly preserve the open nature of the land is considered to be the only policy tool available to prevent the long term erosion and deterioration of this visually prominent land which provides the highly valued and important strategic setting to the city.

16. In this respect, it should be noted that Green Belt designation not only provides long term protection but also a stringent policy context for the consideration of development proposals across its whole extent. This context unquestionably elevates the degree of protection compared to ‘normal’ planning policies.
17. Linked to this point, reference is again made to the Landscape Study of Cardiff undertaken by Atlantic Consultants in May 1999. It is noteworthy in this report that the positive attributes listed for the landscape character areas forming the Green Belt designated area often referred to a remote character including phrases such as, "the rural character", "general absence of buildings, structures..", "predominantly rural, unspoilt, agricultural character with sparse pattern of farms and settlement", "remote secluded character of densely wooded areas and minor valleys along the foothills". Conversely, the report also identified negative attributes to these areas which included, "the suburbanisation of rural settlements and roads", "visually intrusive new development along prominent ridgelines", "some degradation of urban fringe land", "suburban character of some individual properties" and, "disruption of landscape pattern and character by golf course development".

18. The above paragraph demonstrates that whilst Cardiff is fortunate to possess countryside on its doorstep with strong rural qualities, even at the time the report was written in 1999, it is clear that development pressures were identified as a source of undermining these distinctive characteristics. The extra stringency and permanence of Green Belt designation is necessary, over and above "normal" policies, to ensure that Cardiff's distinctive setting is not eroded for future generations and avoid the type of negative detractions identified in the report and permitted without such a policy in place.

19. The protection afforded through Green Belt designation rather than a reliance on general countryside protection or landscape protection policies or other policy mechanisms such as Green Wedge designations reflects the importance of maintaining the openness of this area and protecting it permanently from inappropriate development. Green Belt designation is considered to be the only policy tool to give the long term protection considered necessary to effectively manage urban form.

20. In terms of delivering the LDP aims and objectives, Green Belt designation is fundamental as opposed to other countryside protection policies. This is because the aims and objectives of the Plan seek to provide an effective balance between delivering the necessary long term growth and protecting the environment. The allocation of significant areas of countryside provides long term certainty and represents a permanent change. In order to balance this permanence of development, the long term protection of land meeting the Green Belt criteria is considered a necessary, balanced, appropriate and fair response in terms of meeting the Plan objectives.

Whether the concept of openness (para 4.8.5) is applicable to the whole area proposed as Green Belt, particularly in terms of its topography and landscape character
21. Paragraph 4.8.5 of planning guidance refers to the importance of openness as an attribute of Green Belt designations. The boundaries of the proposed designated Green Belt area fully reflect this important criteria. Reference is again made to the Landscape Study of Cardiff undertaken by Atlantic Consultants in May 1999 as it helps evidence the fact that the Green Belt is based upon an area possessing rural qualities with limited detracting features and clearly forming a strong and distinctive setting to the city.

22. As in response to the first question, relevant extracts have been taken from the study relating to the openness of landscape character areas contributing to the proposed Green Belt designated area.

Garth Hill Uplands: “At 307 metres Garth Hill is the highest point in the county and is one of its most distinctive and prominent landscape features. It serves as a point of orientation and is visible from much of the city and surrounding countryside, including areas outside of the county to the north and west. Views outwards from the hill are equally impressive extending southwards across Cardiff to the Bristol Channel, westwards across the Vale of Glamorgan and northwards towards Pontypridd and Caerphilly. The visibility of the hill is increased by its open character, with few features to interrupt views along its top and flanks”.

Pentyrch Ridges and Valleys: “Rural, pastoral and, in places, remote character, with sparse, dispersed pattern of settlement outside Creigiau”.

Fforest Fawr and Caerphilly Ridge: “Reaching a height of 254 metres, the Caerphilly Ridge is highly distinctive and prominent landscape feature within the county. It is visible from much of the city and surrounding countryside, including the M4 motorway and areas outside of the county to the east. Views outwards from open parts of the ridge are equally impressive, extending southwards across Cardiff to the Bristol Channel...More open ridge and scarp landform extending eastwards which forms an impressive backdrop to the city”

Caerphilly Ridge Foothills: “This area forms a broad tract of gently rolling countryside located between the foot of the Caerphilly Ridge and the northern edge of Cardiff...The area is visually prominent within the county context, forming the gentle foothills of the steep Caerphilly Ridge. The upper parts of the area are visible from much of the city and surrounding countryside, including areas outside of the county to the east and from elevated viewpoints along the ridge above. Views outwards from the higher parts of the area are also extensive, extending to the Bristol Channel”.
23. Therefore, in terms of landscape and topography, the concept of openness across the entire proposed Green Belt designated area is entirely appropriate and logical. This impressive backdrop to the city clearly shares strong rural characteristics and in terms of landform, reads as one unit forming the southern rim to the South Wales coalfields. Whilst there may be undulations and minor stream valleys which do not command as extensive views as most of the area, these features none-the-less form an integral element of the wider landscape unit.

24. Furthermore, it should be noted that the Green Belt boundaries are formed by strong, logical and well-defined features in accordance with national guidance.

**Whether the assertions submitted in relation to the cumulative harm caused by incremental developments could be substantiated, particularly in light of the types of development that would not be considered inappropriate development in a Green Belt in accordance with paragraphs 4.8.14 – 4.8.**

25. The Background Technical Paper: Green Belt states that significant development pressures are exerted on the areas proposed for Green Belt designation, evidenced through a review of planning applications including new dwellings, dwelling conversions, rebuilds, horse related developments which are continuing to have a cumulative impact.

26. In relation to the assessment of the impact of development proposals on the proposed Green Belt areas an assessment was undertaken of all applications received within the study area since 2000. Analysis revealed that between 2010 and 2014 there was a marked increase in the number of applications for single residential units and residential development. Cumulatively these developments have an impact on this highly visible and sensitive area of Cardiff, the setting of the city and the openness of the land proposed for Green Belt designation. Over half of the total approved residential development and single dwelling unit applications occurred between 2010 and 2014.

27. In addition the total number of planning refusals has decreased in real and proportional terms from 2010 to 2014 compared to the period 2000 to 2005. Whilst dwelling applications receive a high rate of refusals overall, during the period 2010 to 2014 77.6% of dwelling and residential applications were given planning permission suggesting an increased desire to develop/build and increased development pressures; and a greater flexibility on policies to allow these proposals to be approved.
28. A similar exercise undertaken for the proposed Special Landscape Area
designations indicates that in the last 5 years of the study period the
proportion of refusals in relation to approvals has gone down in comparison
to the period 2000 to 2010. In the case of residential and single dwelling
unit proposals there has been a dramatic increase in the proportion of these
types of applications being given planning permission. This marked increase
in proposals being accepted; particularly those related to single dwelling units
and residential developments suggests that there is potential for the
character of the SLAs to be threatened and possibly degraded if this trend
continues on into the future. This marked shift could potentially also bring
into question the capacity of existing policies alone to safeguard SLAs in the
future.

29. In addition to the number of applications received the Candidate Site and
Alternative site process reveals the increasing pressure to develop land within
these proposed Green Belt areas, for example land at Briwnant, Tongwynlais,
Pentyrch and north of Junction 30 has been promoted for development.

Whether the permanence of a Green Belt beyond the Plan period can be
justified, particularly in light of the forthcoming strategic approach to
planning in South East Wales and the need to ensure that a sufficient
range and choice of land is available which is suitably located, bearing
in mind the longer term need for development land, the effects of
development pressures beyond the proposed Green Belt and the need to
minimise the demand for travel (as set out in para 4.8.8).

30. It is considered reasonable and wholly consistent with the Plan Strategy to
afford permanence to the protection of areas of countryside meeting Green
Belt designation criteria to provide the appropriate balance to the large areas
of existing countryside allocated for development.

31. The need for long term protection of the areas identified for Green Belt
designation, in advance of the forthcoming strategic approach to planning in
South East Wales, is considered justified. The need for a Green Belt can be
justified now in accordance with national guidance and effectively delivers the
Plans aims, objectives and strategy.

32. The need for longer term protection, beyond the plan period for the areas of
countryside proposed for Green Belt designation is considered to be
necessary now, with the need to ensure the long term protection of these
areas that are not only important in the Cardiff context but can also be
considered to be important in the wider regional context.

33. There can be no guarantee at this juncture that a Green Belt in principle, or
in the area proposed in this Plan, will be delivered through any new strategic
approach through a Strategic Development Plan for the Cardiff Capital
Region.
34. There is the concern that even if a Green Belt was ultimately to be designated through a new strategic process there is still the immediate threat of erosion of the openness of the area in the intervening period, as development pressures clearly exist within the proposed designation, as other countryside protection policies are less stringent and do not offer the same level of long term protection.

35. There has been a long history of recognising the need for a Green Belt around Cardiff. In particular at the regional level the South East Wales Strategic Planning Group (SEWSPG), which was established to prepare regional planning guidance for the South Wales Area, covering the Authorities of Blaenau Gwent, Brecon Beacons National Park, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan, published in January 2000 Strategic Planning Guidance for South East Wales Volume 1 which acknowledged that the regional importance of Cardiff would benefit from the strategic protection of a Green Belt designation around Cardiff that could play an important role in the longer term development of the region as a whole. In particular the SEWSPG guidance identified two objectives in relation to a Green Belt around Cardiff:
   - To prevent further coalescence between Cardiff and Newport
   - To protect the setting of the city, in particular on the southern slopes of Caerphilly Mountain.

36. The designation of a Green Belt, at this point in time, is not considered to preclude future dialogue on the inclusion of additional areas or further discussion across a potentially wider physical area, taking into account wider issues in the future.

37. Importantly however, given that the primary reason for Green Belt designation is to protect the setting of the urban area, it is considered that the geographical extent of the proposed Green Belt area is appropriate to perform that role and that this role will remain a valid in years to come, hence the need for the permanence of protection. Should any future regional process identify other reasons for Green Belts within the region, these can be explored through the required process but the logic and extent of the current Green Belt proposed remains sound.

38. In terms of potentially prejudicing future conclusions through the new strategic approach it is important to consider any designations in Cardiff within the context of policy designations implemented in the areas surrounding Cardiff.

39. Newport City Council’s approved Local Development Plan carries forward the Green Belt designation on land immediately east of Cardiff’s boundary, from the Council’s previously approved Unitary Development Plan. The purpose of this designation is to prevent the coalescence of Cardiff and Newport and protect the openness of land between Cardiff’s boundary to the east and Newport. Therefore the principle of having a Green Belt in place ahead of a new strategic approach has already been established within the Cardiff Capital Region. The new approach would then have the ability to reach
appropriate cross boundary conclusions but with the designated area and the
reasons behind its designation forming a useful starting point. This approach
could equally be applied should a Green Belt be allocated in the Cardiff LDP.
Any conclusions reached via the Strategic Development Plan process with
regard to the Green Belt would then inform future LDP reviews so that over
time LDPs become re-aligned with the Strategic Development Plan sitting
above.

40. With regard to the other surrounding Local Authorities, whilst they do not
have Green Belt designations, much of the area adjacent to Cardiff’s
boundary is covered by other designations which support development
restraint and afford a degree of protection to the adjacent land beyond
Cardiff’s administrative boundary. The adopted Caerphilly Local Development
Plan (November 2010) designates the majority of the area adjoining Cardiff
as a Special Landscape Area and Visually Important Local Landscape and the
adopted Rhondda Cynon Taff Local Development Plan (March 2011)
designates much of the adjoining land as a Special Landscape Area. However
it is important to note that whilst they do support development restraint
Special Landscape Areas, Visually Important Local Landscapes do not provide
the long term permanence and strong policy protection afforded by Green
Belt designation in Cardiff.

41. In response to the points raised in Paragraph 4.8.8 of Planning Policy Wales
the proposed allocations in the Plan ensure that sufficient development land
has been identified in the most suitable locations within the context of the
designation of a Green Belt to protect important areas of countryside. In
addition it is considered that a sufficient range of potential development land
remains available for longer term needs with large areas of countryside
remaining outside the proposed designation to allow for flexibility and options
for future growth thereby not removing the capacity for future development
to take place in the city.

Proposed Changes to Plan

42. In view of the above no changes to the Plan are proposed.
Agreed Action Points

**Action Point 1:**

Further to a previously agreed Action Point (Action 2 of Hearing 2), Council to ensure that an appropriate level of detail from the hearing statements/masterplanning principles/schematic framework is embedded within the Plan, with particular reference to the inconsistency between the settlement boundary and allocation boundaries at Strategic Sites C and G. Specifically, it needs to be made clear why there is an inconsistency between the settlement and allocation boundaries and what the implications would be for potential future applications for development in these areas given the identified issues on parts of the sites (e.g. constraints such as flooding and sand and gravel safeguarding at Site G).

**Action Point 2:**

Council to provide further justification to demonstrate the proposed Green Belt Policy in accordance with the requirements of Planning Policy Wales (PPW), including:

- whether the proposed Green Belt is necessary in light of paragraph 4.8.3;
- why normal planning and development management policies are not considered to provide necessary protection, including the settlement boundary approach which in itself would have a presumption against inappropriate development, general countryside policies, landscape and SLA policies, ecological/biodiversity policies etc (para 4.8.6);
- whether the concept of openness (para 4.8.5) is applicable to the whole area proposed as Green Belt, particularly in terms of its topography and landscape character;
- whether the assertions submitted in relation to the cumulative harm caused by incremental developments could be substantiated, particularly in light of the types of development that would not be considered inappropriate development in a Green Belt in accordance with paragraphs 4.8.14 – 4.8.18; and
- whether the permanence of a Green Belt beyond the Plan period can be justified, particularly in light of the forthcoming strategic approach to planning in South East Wales and the need to ensure that a sufficient range and choice of land is available which is suitably located, bearing in mind the longer term need for development land, the effects of
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development pressures beyond the proposed Green Belt and the need to minimise the demand for travel (as set out in para 4.8.8).

Action Point 3:

Council to advise Ms Hobbs of the status of her land in relation to both the proposed settlement boundary and any Alternative Site proposals in advance of Hearing Sessions 17 and 18.