

APPENDIX 7.5

Land at Upper Cosmeston Farm, Lavernock Road, Penarth

Green Wedge Review

edp5187_r002a

1. Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) had been commissioned by Welsh Government to carry out an assessment of the suitability and functionality of the Green Wedge designation to the south of the settlement of Cosmeston, Vale of Glamorgan, in order to establish the potential for release of Lower Cosmeston Farm from the designation as part of future development of the adjacent allocated site identified by policy MG2 (24) of the Vale of Glamorgan Council Local Development Plan.
- 1.2 The outline proposals for the allocated site identifies the potential for this current complex of agricultural buildings to be redeveloped as part of a new two-form entry primary school.
- 1.3 **Plan EDP 1** provides detail of the proposed development site's boundary and its location in relation to existing settlement and the Green Wedge designation.

2. Green Wedge Policy and Aims

- 2.1 As can be seen upon **Plan EDP 1**, the Green Wedge designation related to Cosmeston and Sully, within which the buildings of Lower Cosmeston Farm are included, is formed of a single block of agricultural green space dividing the south-western edge of Cosmeston (including allocation MG2 (24)) from the eastern edge of Sully. In total the area of this Green Wedge is 333.2 hectares (ha), generally comprising enclosed pasture fields, divided by mature hedgerow with trees. This Green Wedge Review focuses predominantly upon the eastern-most edge of this designation and the parcel of land encompassing the buildings of Lower Cosmeston Farm.
- 2.2 In order to identify the value of the Green Wedge designation in this location, and the contribution that the area in question provides to the designation, it is first required to identify (through national and local planning policy) the purposes and reasoning through which it was designated. This planning context is set out below.

Planning Policy Wales (Edition 10, December 2018)

- 2.3 Paragraph 3.60 of Planning Policy Wales (PPW) Edition 10 identifies Green Belt and the local designations of Green Wedges, as methods for management of urban form. The difference between Green Wedges and Green Belts is defined as one of permanence: Green Wedges have the flexibility to be reviewed within the plan-making process whereas Green Belts should be considered to apply beyond the development plan period. This means that Green Wedges are

more appropriate where land is required to serve the same purpose as a Green Belt but do not need to convey the permanence of a Green Belt.

2.4 Paragraph 3.63 identifies the general purpose of Green Belt, and similarly Green Wedges, to be as follows:

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

2.5 Green Wedges are classified as local designations, identified and put in place by Local Planning Authorities (LPA) through their relevant development plans. In the case of this Green Wedge, the LPA responsible is Vale of Glamorgan Council (VoGC). The LPA is required to state, within their development plans, the areas that require extra protection and the reasoning as to why, with paragraph 3.66 of PPW going on to state that (with EDP emphasis): *“Green Belt and green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term”* and *“When including Green Belt and green wedge policies in their plans, planning authorities must demonstrate why normal planning and development management policies would not provide the necessary protection.”*

Vale of Glamorgan Local Development Plan 2011 – 2026 (adopted June 2017)

2.6 The Vale of Glamorgan Local Development Plan (LDP), adopted in June 2017, identifies that the overriding purpose of the Green Wedge areas of the VoGC is to *“prevent the coalescence of settlements and to retain the openness of land”* and that *“within these areas development which prejudices the open nature of the land will not be permitted”*. As such the LPA deem them to afford a higher degree of protection for the land which lies beyond the designated settlement boundaries. The land in question is located upon the north-eastern edge of the South Penarth to Sully Green Wedge parcel.

2.7 Policy MG18 ‘Green Wedges’ forms the LDP’s policy in relation to the protection of the Green Wedge designation. Within the policy’s accompanying text it states that (with EDP emphasis): *“within the areas defined by the green wedges there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area”*

2.8 Policy MG18 itself does not clearly set out what is considered as 'inappropriate development' however PPW identifies the following:

“3.71 The construction of new buildings in a Green Belt or green wedge is inappropriate development unless it is for the following purposes:

- *Justified rural enterprise needs;*
- *Essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it;*
- *Limited extension, alteration or replacement of existing dwellings; or*
- *Small scale diversification within farm complexes where this is run as part of the farm business.*

3.72 The re-use of buildings in a Green Belt or green wedge is not inappropriate development provided that:

- *The original building is substantial, permanent and capable of conversion without major reconstruction;*
- *The new use will not have a greater impact on the openness of the Green Belt or green wedge and the purposes of including land within it. Strict control will need to be exercised over the extension, alteration or any associated use of land for re-used buildings; and*
- *The building is in keeping with its surroundings.*

3.74 Other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purposes of the designation.”

Green Wedge Background Paper – September 2013

2.9 This Background Paper was produced by the VoGC as an accompaniment to the LDP, forming and applying a methodology to assess the need and justification for Green Wedge allocations throughout the council's authority. It is worth noting that this paper was initially produced as part of the now superseded LDP and as such the extent of Green Wedge shown upon mapping within the Background Paper differs to that shown upon the VoGC's policy mapping, as a result of the addition of Housing Allocation 24 as part of the adopted VoGC LDP (June 2017).

2.10 The paper begins by setting out the tests against which designated areas of Green Wedge are assessed. These are as follows:

- *“To prevent urban coalescence between and within settlements;*
- *To ensure that development does not prejudice the open nature of the land;*
- *To protect undeveloped land from speculative development and*
- *To maintain the setting of built up areas”.*

2.11 Through these headings the Background Paper provides consideration and reasoning in relation to the designation, with reasoning based upon physical experience of the landscape and its character as well as a plan-based approach.

2.12 The Background Paper goes on to identify that the boundaries of the Penarth to Sully Green Wedge are defined by the *“the settlement boundaries of Penarth and Sully, the coastal edge and the main highway network all of which provide robust and permanent features”*, rather than being defined for particular landscape value. The designation is identified to be in place in order to reduce the pressure for new development on this land between Penarth and Sully and to protect against future expansion of the two settlements into this intervening landscape. However, at no point is there any mention as to the importance of the buildings of Lower Cosmeston Farm and their inclusion within this boundary.

3. Area Proposed for Removal and the Green Wedge Context

3.1 The land in question for release from the Green Wedge designation consists of a circa 1.28ha parcel of land upon the southern edge of the identified settlement edge of Cosmeston, as can be seen within **Plan EDP 1**. The land comprises the agricultural buildings and farmhouse of Lower Cosmeston Farm and the incidental space between these features, as seen within **Image EDP 1** below, located adjacent to (and accessed off) the B4267 (Lavernock Road) which forms the main road connection between Cosmeston and Sully. A second area of Green Wedge land is also identified to be within the site boundary, currently comprising equestrian grazing land. Within proposed development this is to be retained as open space (in a natural character) and therefore is not considered to go against the purposes of the Green Wedge and is not considered further within this assessment.

3.2 Though appearing to be separated from the settlement edge of Cosmeston at present by equestrian pasture fields, the buildings of Lower Cosmeston Farm are located alongside Housing Allocation MG2 (24) of the VoGC LDP. Once this allocation is developed it is considered that these buildings will form part of the perceived settlement edge of Cosmeston rather than forming a standalone developed element as they do now. Given that the allocation of this area identifies that the VoGC consider the principle of development to be acceptable, and as such should be considered as part of the existing settlement edge of Cosmeston.

- 3.3 **Plan EDP 1** highlights the local landscape character of the site and its nearby surroundings, including highlighting its proximity to the settlement edges of Cosmeston (considering the allocation's presence) and Sully. Other than Green Wedge, the land in question is not found to contain any other landscape-based designations at either a national or local level.
- 3.4 Through a site visit by a qualified Landscape Architect, it has been identified that the Green Wedge at present provides a notable division between the two settlements, both spatially and visually as a result of the area's characteristic, well maintained hedgerows boundaries and the vegetation associated with the disused railway line which cuts across the designation. **Plan EDP 1** and **Image EDP 1 to 3** highlight the key findings of a visual appraisal of the Green Wedge and its context, and how it influences its surroundings experientially.
- 3.5 When viewed from the wider landscape this defined area of Green Wedge landscape is considered to provide a clear division between the two settlements, with the buildings of Lower Cosmeston Farm already appearing to have a greater relationship to the settlement edge of Cosmeston rather than any relation to Sully. At present the two settlements do not experience clear visual connection with one another.

4. Discussion and Opinion

- 4.1 To assess the viability of the extent of the identified site area for development, the site's contribution to the Green Wedge designation is to be assessed against the five purposes set out within PPW and the policy of Vale of Glamorgan Council's LDP. Through this process it will ensure that *"only land which is strictly necessary to fulfil the purpose of the policy"* is designated.
- 4.2 Recommendations will also be made where required to identify how future proposals upon the site could ensure compliance with the purposes set out below.

Purpose 1: Prevent coalescence of settlements (MG18/PPW);

- 4.3 There is no published or recognised guidance regarding a prescribed distance between settlements which prevents coalescence. Such an assessment should be considered on a case-by-case basis and judged on local circumstances.
- 4.4 Given the already built upon character of the area proposed for removal, the development of this area would not be considered to cause greater coalescence between Cosmeston and Sully, either in terms of aerial/map view (with the southern extent of the adjacent housing allocation extending alongside the farm complex, as seen in **Plan EDP 1**) or in perceptual/experience terms when travelling towards Cosmeston along the B4267 (given that the area in question is already considered as built form and associated with the urban edge of Cosmeston). This is demonstrated through **Image EDP 1 – 3** included below.
- 4.5 Considering the size of the land in question in comparison to the wider Green Wedge Area, and its already developed nature, it is considered that development upon the proposed site would

be unlikely to cause any notable reduction in physical or perceived distance between the two settlements, and would not extend markedly further than the existing settlement boundary of Cosmeston currently defined at the extent of the allocated land parcel or the existing built form of Lower Cosmeston Farm. Little in the way of experiential change would occur in terms of views from the surrounding context. The aim to prevent coalescence would be maintained for the following reasons:

- Existing nature of the area proposed for removal – As seen within **Image EDP 1**, this area is already considered to be ‘developed’, encompassing the large barns, farm buildings and farmhouse of Lower Cosmeston Farm. The area’s removal from the Green Wedge therefore would not result in an area of undeveloped landscape being removed but instead an already built upon area being redeveloped. The existing development upon this area already sets precedent that built form here does not have an impact upon the overall designation. New development proposed would not extend further south than the existing farm buildings and as such would not be expected to cause a greater feeling of coalescence between Cosmeston and Sully than currently experienced.



Image EDP 1: View and appearance of existing buildings within the area of Green Wedge in question, from the access off the B4267.

- Intervisibility between the settlement edge of Cosmeston, Lower Cosmeston Farm and Sully – **Image EDP 2** represents views from the B4267 outside of Lower Cosmeston Farm towards Sully. Intervening vegetation associated with roadside hedgerow and field boundaries cumulatively create a well vegetated appearance to views which curtail the availability of settlement intervisibility. This is also considered to be the same in terms of return views from Sully towards Cosmeston. With this in mind, and the existing buildings of Lower Cosmeston Farm present, the redevelopment of Lower Cosmeston Farm would not result in a notable change to the perceived settlement division experienced from either settlement edge.



Image EDP 2: View from the access to Lower Cosmeston Farm towards the settlement of Sully, which is screened from view by intervening vegetation.

- Approach to Cosmeston from Sully to the south-west, along the B4267 – The B4267 forms the main vehicular connection between the two settlements, with 1.79km of the route passing through uninterrupted landscape (on the most part contained by vegetation of the disused railway line and adjacent hedgerow and tree planting) which is seen to provide division. From the settlement edge of Sully itself, alongside the Green Wedge, visibility of Cosmeston is limited and where glimpsed views occur of rooflines there is perceived to be a clear separation between the settlements as a result of the well treed Green Wedge landscape. **Image EDP 3** represents the first glimpse of Cosmeston when travelling along the B4267 from Sully (location provided on **Plan EDP 1**). These first glimpses include the existing buildings of Lower Cosmeston Farm at the forefront of the settlement, and as such the area of Green Wedge proposed for removal. Again, redevelopment of Lower Cosmeston Farm would not extend existing built form further south along the B4267 than experienced at present, nor beyond the furthest extent of the adjacent allocated site. Therefore, proposed development of a school on this area, if of similar scale to the existing built form, would not reduce the perceived gap or division between the two settlements.



Image EDP 3: Approach from Sully to the west along the B4267 (Lavernock Road).

- Cumulative views of the two settlements together from the wider landscape – Given the distance between the two settlements created by the Green Wedge (circa 1.7km), and the undulating well treed character that this area possesses, availability of views of Cosmeston and Sully together within a single view are limited and where available are clearly seen as two separate settlements. The redevelopment of Lower Cosmeston Farm into a school will not threaten this perceived separation from the wider landscape, extending development no further towards Sully than experienced at present.

Purpose 2: To protect undeveloped land from speculative development (MG18)/Manage urban form through controlled expansion of urban areas (PPW)

- 4.6 In terms of this purpose, the area of Green Wedge proposed for removal from the designation within this review is not considered to be ‘undeveloped’, encompassing a number of agricultural buildings and associated residency (as seen within **Image EDP 1**), and as such would not be considered as an ‘expansion’ to urban form.
- 4.7 The development proposal accompanying this review identifies this area to be used for the development of a two-form entry primary school, extending into the adjoining allocation area up to the vegetation of the disused railway line. Despite consideration of the area’s already developed nature, replacement of existing farm buildings with a sensitively designed school building (of similar scale to existing buildings and with appropriate landscape mitigation) would form a more defensible boundary to development and the Green Wedge than currently perceived, and then would be created if converted to residential development.

Purpose 3: Retain open nature of the land (MG18)/Assist in safeguarding the countryside from encroachment (PPW)

- 4.8 The protection of the open countryside from 'urban encroachment' is an important planning objective; however, all planning regimes must also balance this objective with the controlled delivery of development to meet identified local needs and, as such, defining land as 'countryside' in planning terms cannot, in and of itself, be a barrier to development.
- 4.9 With the presence of vegetation associated with the disused railway line and intervening hedgerow boundaries through the Green Wedge landscape, and the area's undulating landform this area (particularly around Lower Cosmeston Farm) is considered to be of more contained character than one of 'open nature'.
- 4.10 The landscape within which the site is situated already experiences strong urbanising influences from the current settlement edge of Cosmeston, eroding the potential 'countryside' appearance of the northern extent of the designation, instead creating an environment which reads more as a transitional landscape between the settlement edge and the 'countryside further south. As such it is anticipated that the addition of development within this location would not cause added undue pressure or encroachment upon the 'countryside' than the settlement edge does at present, with truly 'countryside' landscape character being limited to and retained within the rest of the Green Wedge area to the south of Cosmeston and east of Sully.
- 4.11 Given that the land in question is such a minor constituent of the overall Green Wedge designation, and it's already developed nature, it is considered that reinvention of the farm buildings as a school (if developed to a similar scale) would not have an adverse impact upon the open nature of the remaining land within the designation.

Purpose 4: To maintain the setting of built up areas (MG18)/Protect the setting of an urban area (PPW)

- 4.12 The Green Wedge designation also aspires to protect the setting of urban areas such as Cosmeston; however, as described above, Background Paper 4's objective assessment of the Green Wedge designation and the land included within it does not appear to be based on an assessment of the key characteristics of the setting of the town, but rather just follows the identified settlement boundary, road route of the B4267 and coastline.
- 4.13 Through a data trawl of LANDMAP and the VoGC's landscape character assessment (Vale of Glamorgan County Borough Council Designation of Landscape Character Areas; dated August 2008) a running theme seems to be a concern regarding the 'poorly managed' nature of the area which 'erodes its integrity and character' and creation of disturbance and disruption to the landscape with reference to 'discordant boundaries'. A clear need is highlighted to get this under control and improved. As mentioned previously, the farm buildings of Lower Cosmeston Farm appear to be in a state of disrepair, appearing more as an urban detractor than a functioning rural farm. Redevelopment of these buildings to a school of sensitive design and a similar scale would aid with an element of improvement of the areas landscape character and would improve

the quality of the new urban edge to be created as part of the adjacent allocation – potentially providing softening with careful location of playing fields etc.

- 4.14 At no point within the Green Wedge Background Paper or the landscape character assessments are the current buildings of Lower Cosmeston Farm noted to contribute markedly to the setting of the urban area of Cosmeston or to be of vital importance to the purposes of the Green Wedge designation.

Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

- 4.15 Re-development of the farm buildings within the proposed area of land for removal would address this purpose well, recycling a currently poorly maintained farm complex which is now used predominantly for equestrian stabling and pasture rather than agricultural purposes, rather than extending development out into currently green field land parcels adjacent to the south.

5. Conclusions

- 5.1 EDP's appraisal of the Lower Cosmeston Farm area and its inclusion within the Green Wedge designation has drawn the following conclusions:

- At present the Green Wedge as a whole is deemed to successfully provide division between the two settlements as a result of distance, undulating topography and intervening vegetation. Lower Cosmeston Farm is not identified within VoGC's Green Wedge Background Paper to contribute notably to the purposes of the Green Wedge but instead just forms a physical boundary feature;
- The area proposed for removal from the Green Wedge already contains built form; poorly managed and used for equestrian stabling and pasture rather than its initial rural agricultural use. These buildings set a precedent that built form upon this land would not impact the Green Wedge designation;
- Proposed redevelopment would not extend built form further south than currently experienced and would not result in the loss of open, undeveloped land from the Green Wedge extent. Sensitive design of the area would also have potential to provide an improved settlement edge and transitional landscape between built form and the Green Wedge landscape than currently experienced. Redevelopment would not reduce the distance experienced between the two settlements, either in plan, when travelling along the B4267 or when experiencing Cosmeston and Sully within the same view;

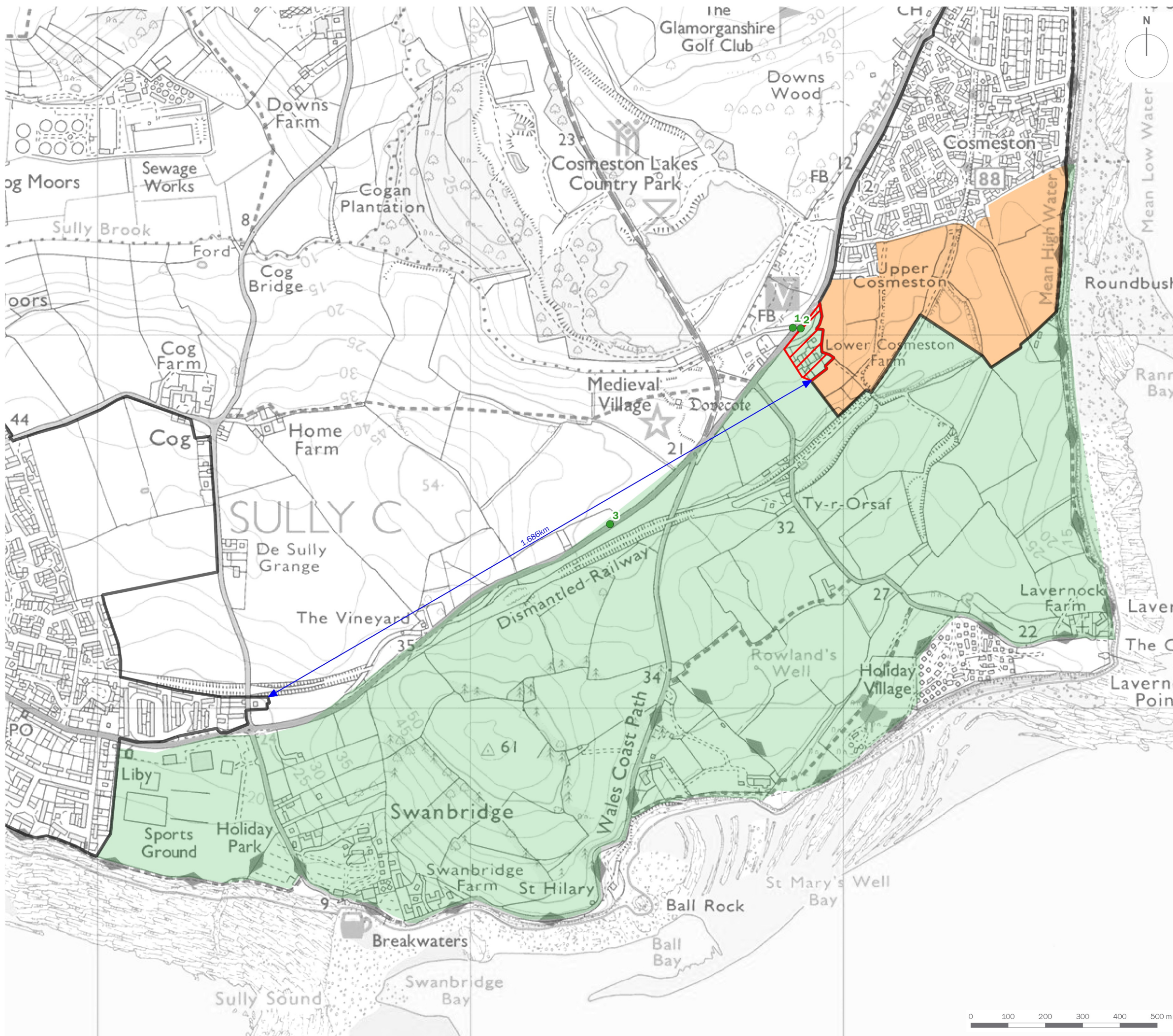


- The existing 'openness' of the Green Wedge is limited in perceptual terms by its vegetated character. Given that the area is already developed, the addition of new proposals would not reduce the feeling of openness currently experienced; and
- Removal of the proposed extent of Green Wedge, for re-development as a two-form entry primary school, is not considered to go against the five purposes of this Green Wedge designation. With considered and sensitive design of new development, it is considered that Green Wedge land remaining following the site's change of use will continue to be sufficient to comply with, and achieve, these purposes.

5.2 EDP's assessment has considered the above and concluded that development of the part of the designation comprising Lower Cosmeston Farm would not cause demonstrable harm in relation to the overall purposes of the Green Wedge. The site in turn offers clear boundaries, defined by physical features, which could be used as defensible boundaries to a future revision of the policy designation of Green Wedge.



Plan EDP 1
Green Wedge Removal Area
(edp5187_d020 27 June 2019 EB/DL)



- South Penarth to Sully Green Wedge
- Area Proposed for Removal
- Housing Allocation 24 of VoGC Local Development Plan 2011-2026
- Settlement Edge (defined on the VoGC Local Development Plan 2011-2026 Adopted Proposals Map)
- EDP Image Locations

client
Welsh Government

project title
Land at Upper Cosmeston Farm, Lavernock Road, Penarth

drawing title
Plan EDP 1: Green Wedge Removal Area

date	27 JUNE 2019	drawn by	EB
drawing number	edp5187_d020	checked	DL
scale	1:10,000 @ A3	QA	LB



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk