

May 2010

CAERPHILLY LDP UP TO 2021**GREENDOORSTEP SUPPLEMENTARY REPORT****HOUSING****1.0 INTRODUCTION**

1.1 Before assessing the suitability of each proposed site for housing the following should be used as guidelines.

1.2 Caerphilly town is classified in the Wales Spatial Plan as a primary key settlement as follows:-

(Page 128 Wales spatial plan) :

The key settlements must be successful in their own right and, where appropriate, function as service and employment hubs for smaller settlements. The focus will be to create affordable and attractive places to work, live and visit. The success of the key settlements should improve life in smaller rural and valleys communities, with good access to services being a key determinant of quality of life. Key settlements will provide the central framework around which high capacity sustainable transport links will be developed. A wider range of facilities and services, which add to employment opportunities, should be delivered locally within the key settlements to reduce the overall need to travel

1.3 We have assessed the proposed sites with the above vision in mind, using the following criteria;

- i) Will housing on the site improve access to employment locally and reduce the need to travel?
- ii) Will housing on the site improve the level of provision of outdoor playing space in the area?
- iii) Will housing on the site improve the level of other much needed services on the site?

1.4 In other words will the housing development comply with the advice given in the LDP deposit plan? (page 52, SP25 1.99):

1.4.1 (1.99) *“Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities”*

1.4.2 Also is it contravening the LDP s policy for protection of open space:

(Page 59) *“Protection of Open Space CW 10 Proposals for development on areas of open space within settlements will only be permitted where:*

- A The amount of open space remaining in the neighbourhood would still be adequate to serve local needs;*
- B The site has no significant value as a recreational resource or an area of visual amenity.”*

2.0 SUMMARY CONCLUSION

2.1 The present level of out-commuting is very high in Caerphilly Basin.

2.2 With the regard to more localised facilities such as outdoor formal playing space, the central part of the Basin is severely lacking in land for outdoor play space.

2.3 Caerphilly Basin has the:

- greatest problem of out-commuting;
- worst provision of recreation space;
- most expensive and one of the lowest capacity public transport to access the job market of any other area in the South East Wales planning area.

2.4 Therefore there is no justification in allocating housing sites in Caerphilly Basin.

SPECIFIC SITES

3.0 MINERS HOSPITAL

See Appendix A2 for evidence and more information

3.1 The rest of the Hospital site must not be used for housing except possibly a small sheltered accommodation site or care home facility. This would only take a small section of the site and would prevent people in this area moving out of their own community when they need that type of facility.

3.2 The site could be used for a variety of facilities which are needed in this area. Some of the buildings on the site are worthy of retention. Thus complying with advice given in the LDP page 52 SP 1.99

“1.99 Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities”

3.3 The facilities that are needed in this area and may be suitable for this site are:-

- i) allotments on the greenfield part of the site
- ii) Welsh language primary school education
- iii) outdoor recreation such as a bowling green, tennis, all weather sports pitch
- iv) indoor sports hall
- v) youth centre
- vi) local health facilities or small care home
- vii) non-intrusive employment such as offices

4.0 WATERLOO PAINTWORKS HG 1.16

See Appendix A3 for evidence and more information

4.1 We object to this site being allocated for housing. See our background paper on housing sites.

4.2 This site is designated as Brownfield when 2 of the fields on the Trethomas side of the site have always been farmland.

4.3 The site was previously used for employment and should continue to be used as such.

5.0 ST ILANS SCHOOL

See Appendix A4 for evidence and more information

5.1 The existing site could be utilised as follows:-

- For Welsh Medium Secondary Education (800 pupil currently being bussed out of the Basin);
- The playing pitches should be retained for public use until such a time as the provision in the rest of the town is brought up to standard (shortage of playing fields in the Basin);
- For employment purposes (it is the ideal site for any activity requiring access by public transport by the maximum number of people).

- This site is much needed for local services and local employment thus reducing the need to travel and improving education. It too valuable to the community for it to be used for housing commuters to Cardiff.

6.0 ST JAMES SCHOOL

See Appendix A5 for evidence and more information

6.1 This site has been allocated for 49 units. We object to this site being allocated for housing.

6.2 Mid Glamorgan County Council proposed to provide two full-sized playing pitches together with a car park and a pavilion. These pitches have never been provided and the land has been used for other purposes.

6.3 This unmet need for recreation space in the area should be provided.

[At present the land where St James school is to be built is part of the open space attached to the school. Therefore if houses were built on the old school site then there would be a net loss of open space for the school and the community].

6.4 The St James ward is ranked the 9th worst ward in Wales as far as the Welsh index of multiple deprivation is concerned. This ward needs more facilities such as employment recreations peace etc.

6.5 We believe that the plan to build homes on this site has nothing to do with the need for homes but the need to raise money to rebuild the school. This policy is unsustainable.

7.0 VENOSA

See Appendix A6 for evidence and more information

7.1 We have objected to this site being allocated for housing. The site is described as Brownfield when some of the site is part of Virginia park and was allocated in the 1983 Caerphilly Basin plan for playing pitches (See document LA2, Page 31 R1a).It should be retained for:

- employment
- leisure.

7.2 This site is ideal for employment as it is within walking distance of a large percentage of the people of the Caerphilly.]

7.3 The area allocated for playing pitches (26 Ha) has not been provided. The shortage as described in the 1983 plan still exists and is actually worse

due to an increase in population.

7.4 The rest of the site was until recently used for employment and is still needed, especially as the site is adjacent to the St James ward which has the 9th highest multiple deprivation figure in Wales.

7.5 Also, this allocation would not comply with LDP (page 52.SP25 1.99), which identifies the need to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing.

7.6 It contravenes the LDP s policy for protection of open space (page 59) [see Appendix]

8.0 HENDRE SCHOOL HG 1.74

8.1 This is one of three schools in the Caerphilly Basin where the Council are trying to finance the replacement of schools by selling off the old school sites after building on the recreation areas adjacent to the site.

8.2 The plans are to build on the playing fields of St Cennydd school without replacing the playing fields. These fields were ‘earmarked’ for upgrading to relieve the shortage of playing fields identified in the previous UDP, so it is proposed to ‘upgrade’ them by making them smaller !

8.3 This results in a net loss of recreation area either for the school itself or the community in General. This policy is unsustainable it amounts to “selling the family silver” for short term gain but suffering the loss of a facility forever.

8.4 We propose the redundant school site is used to benefit the community not as new housing .

8.5 This allocation will not comply with LDP page 52.SP25 1.99 which requires such a site to be used for “the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities”

Appendices A1 – A6 on following pages

APPENDIX A1

BACKGROUND PAPER FOR HOUSING SITES

GENERAL PRIORITIES

A 1.0 Employment

A 1.1 Office for national statistics web site state that the numbers of people claiming jobseekers allowance in the Caerphilly basin is 1,025. In the Southern Connections corridor, as a whole, it is 1372.

A 1.2 In the Heads of the Valleys re-generation area to the north of the county it is 822. This shows that although the Northern part of the County is suffering deprivation there are far more people seeking work in the South of the County than in the North.

A 1.3 The LDP plays down this fact and does little to remedy the problem. If the LDP wants to cut down the unemployment figures it must tackle the problem in the Caerphilly Basin where 32% of the people claiming jobseekers allowance live.

A 1.4 Despite the LDP stating that it is only 17min by train into Cardiff, most people in the Caerphilly Basin do not live within 20min walk from a railway station and of those that do, how many work within walking distance of a railway station?

A 1.5 for the vast majority of people living in the Caerphilly Basin public transport to employment sites out of the Basin is poor and expensive and is not able to compete with the cost of running a car (see table below).

Petrol*	11.49	12.43	14.92	16.44	20.30
Tyres	0.95	0.79	0.78	1.14	1.68
Service labour costs	3.48	3.54	3.33	3.7	3.59
Replacement parts	1.85	2.03	2.0	2.13	2.52
Parking and tolls	1.8	1.8	1.8	1.8	1.8

Total (pence)	19.57	20.59	22.83	25.21	29.89
---------------	-------	-------	-------	-------	-------

The A.A. estimates that the marginal cost of running a car is approx 20p per mile.

The 14mile return rail journey to Cardiff costs More Than £5 i.e. 35p per mile.

Most people in the Caerphilly Basin need to use a combined bus/train journey costing £28 per week for a season ticket using just Caerphilly buses but £35 if Cardiff buses are required as well.

These fare prices are the highest per mile in the South East Wales area

The LDP s figures show that in 2001 26,000 people From Caerphilly commuted to outside the county. The 2007 national statistics for wales figures show that 35,000 people out commuted out of a total of 71,000 working residents so 9,000 more people were out-commuting. If the Caerphilly basin is an average of the County then Nearly 12,000 would be out-commuting and 6,000 commuting in.

A 1.6 Therefore in order to be “successful in its own right and, where appropriate, function as service and employment hubs for smaller Settlements”, then the Caerphilly Basin needs to generate at least 6,000 jobs. However the figure may be much higher than this as we believe the level of out-commuting in the Basin is much higher than the County average and there are many more people commuting to areas within the county but outside the basin to areas that do not have Public transport serving them.

A 1.7 On this basis all land near good public transport links should be first considered for employment purposes.

A 2.0 Outdoor Playing facilities (as defined by the N.P.F.A.standard)

A 2.1 There is a severe shortfall of land within the Caerphilly town Wards ie, St James, St Martins, Morgan Jones, and Penyrheol wards.

A 2.2 Statistics

The following shows the land required fro outdoor playing fields

This area has a population	=	33,000
Land required for formal recreation	=	79 ha
Land in use	=	15 ha
Shortfall	=	64 ha (80%)

Therefore we have a shortfall of 80% and need another 64 ha of outdoor playing space

A 2.3 The only provision being made to remedy this shortfall is the plan to upgrade the school pitches for public use. However this was ‘planned’ as part of the Caerphilly U.D.P for the previous plan period - so how many times can one upgrade the same pitches? Also as far as we know the school pitches are still not available to the public and in the case of the St Martins school we are led to believe the school is not run by the County, and the governors of the school will not allow matches to be played on the pitches.

A 2.4 Even if the school pitches were all upgraded and used exclusively by the public then there would still be a shortfall of 60ha.

A 2.5 The only recreation space for the St Martins ward in the previous U.D.P. was the site adjacent to Cwrt Rawlin School and has now been taken over by the school for additional classrooms and play space for the school.

A.2.6 The area proposed for leisure west of Caerphilly Miners hospital is unsuitable for formal recreation as it consists of a balancing lake for drainage purposes and insufficient land even for a small unorganised kick about area and to make matters worse the land is unsuitable because it is polluted by dog owners.

A 2.7 NPFA standards

A 2.7.1 The adult portion only of the N.P.F.A. standard requires 1.6 ha of land per 1,000 people.

A 2.7.2 Welsh assembly technical advice guidance, TAN16 uses a benchmark which asks for 1.15 ha (approx 1 playing pitch?) per 1,000 population, and should be within 1,200m of the population it serves. Therefore Caerphilly central should have 33 playing pitches

A 2.7.3 We can only identify 9 ha, ie. a 75% shortfall. Even if all the school pitches were included there would be only 15 ha. ie. 54% shortfall.

A 2.7.4 Tan 16 benchmark also asks for an additional 0.45ha per 1,000 population for other activities such as bowling greens and tennis courts. We estimate that there are no bowling greens or tennis courts within 1200m walking distance of possibly 50% of the population of central Caerphilly. area space is required within 400m walking distance of homes. This is not provided at all in many areas.

A 2.7.5 The figures published in the LDP indicate that approx 70% of the population of Central Caerphilly Basin do not live within 400m of a green space.

A 2.7.6 Background paper 10 of the L.D.P. refers to a percentage of population in electoral wards in Caerphilly meeting the CCW 'Green Tool kit' criteria 400m. However The LDP seems to adopt a lower standard than TAN 16, which calls for a six minute walk or 300m.

APPENDIX A2

PROPOSED HOUSING AT THE MINERS HOSPITAL HG 1.72

This should be read in conjunction with our document Greendoorstep Background Paper for housing sites (Appendix A1).

This site is earmarked for 114 housing units on 3.26 acres.
We objected to this site being allocated for housing for the following reasons.

It is described as a Brownfield site when approx 33% of the site is green field and has only ever been used for grazing or agriculture.

For this reason we propose that the Greenfield part of the site is;
RING-FENCED IMMEDIATELY AND RETAINED FOR ALLOTMENTS.

This field is the only piece of undeveloped land left within the settlement limit of south west Caerphilly that is capable of growing food. See WAG doc local sourcing of food action plan 2009.

There is a population surrounding this site of approx 4,000 people who do not live within walking distance of allotments (W.A.G.say that 800m is a reasonable walking distance for replacement allotments).Walking distance is especially important for allotments they are attended on a daily basis and is not suitable for accessing by public transport (carrying goods etc). No public transport on Sundays and evenings in this area. Non car owners are not socially included and car owners cause pollution and greenhouse gas emissions.

The rest of the Hospital site must not be used for housing except possibly a small sheltered accommodation site or care home facility .This would only take a small section of the site and would prevent people in this area moving out of their own community when they need that type of facility.

The site could be used for a variety of facilities which are needed in this area, and some of the buildings on the site are worthy of retention.

Thus complying with advice given in the LDP page 52 SP 1.99 which states:
1.99 "Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities"

The facilities that are needed in this area and may be suitable for this site are:-

1. Welsh medium primary education

(This site is within walking distance of a large catchment area for pupils who

are now bussed into the town area of Caerphilly).

2. Formal outdoor and indoor leisure facilities.

(At present this site is within walking distance of Approx 4,000 people who live beyond the benchmark distance 1,200m for access to playing pitches bowling greens, tennis, courts etc. Using this site for housing would prevent these people from being able to improve this situation. The promised upgrade of the St Martins school playing fields was promised for the last UDP period so this will not be new upgrade and would have to cater for an increased population from this housing development.

Even if it did take place the new facilities used would be the only facility for The St Martins ward 7,000 pop. Of whom 6,000 live beyond the 1200m benchmark distance. And would require 6 playing pitches to be up to standard

There are only 3 on the St Martin's site and it is doubtful if they will ever be made available to the public

The St Martins School site would still be beyond the 1200 m benchmark distance for at least 2,000 people in the area.

This site could be used for tennis courts a bowling green or any indoor facility. No indoor facilities presently exist in this area and there is no public transport after 18.30 or on Sundays.

NB. Policy CW 10 b (page 59 LDP) states:

"Protection of Open Space

CW 10 Proposals for development on areas of open space within settlements will only be permitted where:

- A The amount of open space remaining in the neighbourhood would still be adequate to serve local needs;*
- B The site has no significant value as a recreational resource or an area of visual amenity."*

We have clearly shown that that the open-space in the neighbourhood is inadequate and this site has value as a recreational resource. The housing proposal should be rejected on these grounds alone.

The proposed open space west of the hospital cannot be used for formal open space as explained in our background paper

4. Employment

At present this site serves as a local hospital and employs many people. This will be a great loss to the Caerphilly Basin as the site is within 15min walking distance of approx 10,000 people and it is within a combined walk bus journey of 35 min of almost everyone in the Basin.

Eg. Graig y Rhacca - Miners' hospital route A Stagecoach 28 min

Or combined walk and 10min interval bus service 33min - cost £10perweek.

Compare this with having to work in Cardiff

Graig y Rhacca to Cardiff, route A-----68min—cost £17.40 per week. With one bus per hour, none on Sunday's last bus home 1810.

Or Graig to Rhacca to the new hospital at Ystrad Mynach

Ystrad Mynach route 50 walk plus bus-----50min cost £20.per week

However the first direct bus does not arrive at Ystrad Mynach until 0827 so an earlier start would require leaving Graig y Rhacca at 06.45 to change buses to start work at 08.00.

Travelling outside the Caerphilly basin to work is not as easy as the 17min train journey into Cardiff as the LDP implies.

This site is much more valuable to the people of Caerphilly as an employment, leisure services or health facilities. Preferably a combination of all three.

See also our Background Paper for housing sites with regard to out commuting in Caerphilly [Appendix 1].

APPENDIX A3

PROPOSED HOUSING AT WATERLOO PAINTWORKS HG 1.16

We object to this site being allocated for housing. See our Background Paper for housing sites (Appendix A1).

This site is designated as Brownfield when 2 of the fields on the Trethomas side of the site have always been farmland.

The site was previously used for employment and should continue to be used as such. Site is within walking distance and a short public transport journey of most of the Caerphilly basin. Within 15 min bus ride of this site there are three areas which are in the worst 10% in Wales regarding multiple deprivation.

The deprivation domain indicators for this area which are not below average are the housing, education and physical environment all the others are in the worst category. This indicates that the housing situation is acceptable.

Unemployment is high but public transport outside to employment outside the area is poor and expensive. See enclosed Traveline documents showing journey times from this site to employment in Cardiff is much higher and more expensive than areas further away from Cardiff. This site is only 7 miles to Cardiff. Yet it costs £20-28 in fares and takes at least 68min. This is not competitive with the marginal cost of running a car i.e. 20p per mile. £12 per week. Only people with access to a car and somewhere to park it will live on this site.

THIS AREA NEEDS EMPLOYMENT BUT USING THIS SITE FOR HOUSING WILL PREVENT THE AREA FROM BEING MORE SELF SUFFICIENT IN JOBS AND WILL INCREASE THE NEED TO TRAVEL.

It noticeable that the site will require a new school to be built on the site yet Caerphilly County has a surplus of nearly 4,000 primary school places in the County. This is not logical and shows that previous plans have caused an imbalance and homes have been built in the wrong places, putting a strain on services in some areas but with other areas de-populating.

This is not sustainable.

Housing on this site will not benefit local people. The LDP has no responsibility to provide work for building companies nor provide housing for in-migration when other areas in south east Wales have far better access to the jobs market. See enclosed traveline Cymru documents showing that even areas to the East of Newport have more affordable and quicker public transport to Cardiff.

APPENDIX A4

PROPOSED HOUSING AT ST ILANS SCHOOL HG1.68

This site has been allocated for 200 homes. We object to this site being allocated for homes. The document "Greendoorstep Background Paper for housing sites (Appendix A1) needs to be read in conjunction with this.

This allocation will not comply with LDP page 52.SP25 1.99

1.99 " Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities"

And it contravenes the LDP s policy for protection of open space (Page 59)

"Protection of Open Space

CW 10 Proposals for development on areas of open space within settlements will only be permitted where:

- A The amount of open space remaining in the neighbourhood would still be adequate to serve local needs;*
- B The site has no significant value as a recreational resource or an area of visual amenity."*

This site was used for English medium secondary education and consists of some buildings which are worthy of preservation.

It also includes extensive playing field areas.

Although it is not required for English medium secondary education. It could be utilised for Welsh Medium Secondary Education. At present there are at least 800 pupils travelling outside the Caerphilly Basin for secondary Welsh medium education. This site could be used for that purpose. The buildings are purpose built for this. This would improve the education of these pupils as their present school is remote from public transport and many pupils opt out of extra-curricular activities due to transport problems.

There is also a shortage of adult education facilities in the Caerphilly basin.

At present most of the evening Classes in the basin are provided at Bedwas Comprehensive school. A very limited range of courses are on offer at St. martins school .Most classes start at 19.00 and finish at 21.00. Many people in Caerphilly cannot get home from work early enough to get a bus (usually 2 buses) to get to Bedwas by 1900. Not many people from the Caerphilly Basin can work in Cardiff and attend an evening class in Bedwas using public transport (unless they live in the Bedwas area). Evening classes require a

more central site as the evening bus service is not as frequent as the daytime services.

Open space

Although there may not be a shortage of formal play areas in this area, the sports pitches that exist in the locality are required to serve the whole of the Caerphilly town area .There are 5 playing pitches near this site and along with the other 4 in the town are needed for a population of 33,000 .There is a shortage of 24 playing pitches. Therefore the playing pitches on this site should be retained for public use until such a time as the provision in the rest of the town is brought up to standard .

This site could also be used for employment purposes as it is only 5-10min walk from Piccadilly crossroads area. All the bus services entering Caerphilly intersect at this area .It is the ideal site In Caerphilly for any activity requiring access by Public transport by the maximum number of people.

APPENDIX A5

PROPOSED HOUSING AT ST.JAMES SCHOOL HG 1.65

This site has been allocated for 49 homes. We object to this site being allocated for homes. The document Greendoorstep Background Paper for housing sites needs to be read in conjunction with this document (see Appendix A1).

This allocation will not comply with LDP page 52.SP25 1.99

1.99 Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc

And it is contravening the LDP s policy for protection of open space (Page 59)

“Protection of Open Space CW 10 Proposals for development on areas of open space within settlements will only be permitted where: A The amount of open space remaining in the neighbourhood would still be”

We believe that this site was part of the site originally allocated for full size playing pitches in the 1984 Caerphilly Basin Local plan doc LA2 in the LDP. (see Caerphilly Basin local plan 1983 which on page 32 proposed the following):-

4.2.2 (b) Lansbury Park In association with Mid Glamorgan County Council it is proposed to provide two full-sized playing pitches together with a car park and a pavilion”

THIS FACILITY HAS NEVER BEEN PROVIDED

No other alternative sites have been proposed for these pitches so there is still an unmet need for recreation space in the area.

Due to the increase population arising from the new housing there would be an additional burden on the existing facilities. (See also page 31 of the LA 2 document 1983)

The 1983 Caerphilly basin plan page 31 stated:-

4.2 4.21 Outdoor recreation

A comparison of existing playing facilities with the recommended advisory standards of the National playing Fields Association(N.P.F.A.) has shown that, overall, the plan area is deficient by some fifty six hectares of playing pitches and about 7 hectares of children’s playgrounds “

That plan allocated 26 ha of land at Virginia Park and land at Lansbury Park and Llanbradach for sports pitches. None of this has come about and much of the land is now used for other purposes.

APPENDIX A6

PROPOSED HOUSING AT VENOSA HG1.66

We have objected to this site being allocated for housing. It should be retained for employment and leisure.

The site is described as Brownfield when some of the site is part of Virginia park and was allocated in the 1983 Caerphilly Basin plan for playing pitches (See document LA2, Page 31 R1a). The area allocated for playing pitches (26 Ha) has not been provided. The shortage as described in the 1983 plan still exists and is actually worse due to an increase in population.

The 1983 Caerphilly basin plan page 31.stated:

4.2 4.21 *“Outdoor recreation*

A comparison of existing playing facilities with the recommended advisory standards of the National playing Fields Association(N.P.F.A.) has shown that, overall, the plan area is deficient by some fifty six hectares of playing pitches and about 7 hectares of children’s playgrounds “

The rest of the site was until recently used for employment and is still needed. The site is adjacent to the St James ward which has the 9th highest multiple deprivation figure in Wales.

At present most of the working population of the Caerphilly Basin need to travel outside the area to work .The public transport system to outside the area is expensive and of poor quality. This site is ideal for employment as it is within walking distance of a large percentage of the people of the Caerphilly basin, and it is 50m from the most regular bus services in the Caerphilly Basin. It is ideal to capture commuters who would otherwise use cars to drive outside the area, thus reducing the need to travel. [The Greendoorstep Background Paper - housing sites (Appendix A1) needs to be read in conjunction with this document].

Also, this allocation will not comply with LDP page 52.SP25 1.99

1.99 “Care needs to be taken to ensure that sites that are suitable for the development of much needed facilities such as surgeries, youth centres, formal outdoor leisure facilities etc are not developed for alternative more profitable land uses such as housing but are safeguarded for the development of such facilities”

And it contravenes the LDP s policy for protection of open space (page 59)

“Protection of Open Space

CW 10 Proposals for development on areas of open space within settlements will only be permitted where:

A The amount of open space remaining in the neighbourhood would still be adequate to serve local needs;

B The site has no significant value as a recreational resource or an area of visual amenity.”

