

**WENTLOOGE COMMUNITY COUNCIL**

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**OBJECTION LETTER – WENTLOOGE COMMUNITY COUNCIL**

**Re: Objection to Planning Application [insert reference] – Greenmoor Farm / Greenmoor Nurseries, St Brides, Wentlooge**

Dear Jacob Cooke,

Wentlooge Community Council wishes to register a strong objection to the above application. The Council has reviewed the submitted documents, the history of the site, and the previous refusals and appeal decisions. It is clear that the current proposal fails to address the fundamental issues identified repeatedly by Newport City Council and the Planning Inspectorate.

Our reasons for objection are set out below.

**1. Continued Over-Development of the Site**

The site has been subject to incremental and cumulative development over many years, much of it through retrospective applications or unauthorised works later regularised. This pattern has resulted in:

- A progressive intensification of built form within a highly sensitive landscape
- A domestic character creeping into an area designated for its openness and rural qualities
- A level of development that is incompatible with the purpose of the Green Wedge and the Wentlooge Levels Special Landscape Area

The current proposal represents a further step in this pattern of over-development. The cumulative impact is now significant and materially harmful. The Council considers that no further development can be justified on this site without undermining the policy protections intended for this landscape.

**2. Previous Refusals and Appeal Decisions Have Not Been Addressed**

The site has a clear and well-documented planning history. Both Newport City Council and the Planning Inspectorate have previously refused applications for a dwelling here, citing:

- Failure to meet the TAN 6 rural enterprise dwelling tests, particularly the *Other Dwelling Test*
- Inappropriate development within the Green Wedge
- Harm to the Special Landscape Area
- Unacceptable flood risk under TAN 15
- Insufficient evidence regarding foul drainage impacts on the Gwent Levels SSSI

The new submission does not resolve these issues. In several areas, it simply repeats arguments already rejected at appeal. The Inspector's conclusions remain directly relevant and carry substantial weight. The Council is concerned that the applicant continues to resubmit applications without addressing the core policy conflicts.

**3. Retrospective Development and Non-Compliance**

The Community Council is increasingly concerned about the pattern of:

- Retrospective planning applications
- Development commencing prior to consent
- Conditions not being discharged or adhered to
- Attempts to regularise unauthorised works after the fact

This undermines public confidence in the planning system and places an unfair burden on the local authority and community. The current application appears to rely on assumptions about the site's operational needs that have been shaped by unauthorised or unregulated expansion.

The Council urges Newport City Council to consider the full enforcement context when determining this application.

#### **4. Inappropriate Development in the Green Wedge**

The site lies within the Newport–Cardiff Green Wedge, where new residential development is strictly controlled. The Planning Inspectorate has already confirmed that:

- The enterprise does not justify a new dwelling
- No very exceptional circumstances exist
- A dwelling here would erode openness and contribute to urban encroachment

Nothing in the new submission changes this position. The proposal remains in direct conflict with LDP Policy SP7 and Planning Policy Wales.

#### **5. Harm to the Special Landscape Area (SLA)**

The Wentlooge Levels SLA is a landscape of national importance. The proposed dwelling would:

- Introduce further domestic built form
- Intensify visual clutter
- Disrupt the characteristic openness and linear field pattern

The Inspector previously found the design and siting to be harmful and intrusive. The revised scheme does not overcome these concerns.

#### **6. Flood Risk – TAN 15 Justification Test Still Fails**

The site is located within high flood risk zones. TAN 15 requires the development to pass the justification test before mitigation is considered. Because the rural enterprise need is still not demonstrated, the proposal cannot pass this test.

The Community Council is deeply concerned about the precedent that would be set by approving a new dwelling in an area known to be at significant risk of tidal and fluvial flooding.

#### **7. Foul Drainage and Risk to the Gwent Levels SSSI**

The Gwent Levels are exceptionally sensitive to hydrological change. The application again fails to provide:

- A detailed foul drainage assessment
- Evidence of no adverse impact on the SSSI

- Compliance with Circular 008/2018

This remains a standalone reason for refusal.

### **Conclusion**

Wentlooge Community Council urges Newport City Council to refuse this application. The proposal represents:

- Continued over-development of a sensitive site
- A failure to address previous refusals and appeal findings
- A disregard for retrospective development concerns
- Clear conflict with TAN 6, TAN 15, PPW, and the Newport LDP
- Ongoing risk to the Green Wedge, SLA, and Gwent Levels SSSI

The Council considers the proposal to be fundamentally unacceptable and contrary to the public interest.

Yours faithfully,

Nikki Malpas

Clerk

Wentlooge Community Council