

# **Merthyr Tydfil Replacement Local Development Plan 2016 to 2031 Examination Hearings**

## **Hearing 9: Strategic and housing site allocations SW3.31 Cwmfelin, Bedlinog Thursday 21 August 2019**

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### **Submission by Jim Davies**

#### **Background**

1. This further statement is submitted to the Examination by James N Davies (Participant No 287), of Bedlinog. It is submitted in response to the resumed Examination to consider further evidence on allocated sites SW3.5 (Erw Las) and SW3.31 (Cwmfelin), and any consequential revisions to housing land supply.
2. This statement is concerned with Policy SW3.31 regarding the Cwmfelin Slopes site at Bedlinog. Day 3 of the Examination dealt with strategic and housing site allocations. This statement recommends that SW3.31 (Cwmfelin) be removed from the allocated sites and the housing shortfall be re-allocated, as accepted in response AP4.3. The ecology, ownership and access constraints confirm the failure of the site.

#### **Overview of site**

3. This is a particularly sensitive location in a village setting which is precarious, and has a poor planning history. Allocation of this site for development poses a significant threat to the survival of wildlife and species. Protecting nature and biodiversity is an important objective in itself. It cannot easily be balanced against the need for housing. However, the special circumstances of this site argue against its release for housing. It is unlikely that any amount of mitigation would work or be appropriate in this instance.
4. Maps are attached to show the site in 1919 and before. The four modern houses were built after 2000 mainly on a former allotment site rather than on virgin ground. The fifth house intruded partly into the old habitat. Sites such as this are inappropriate for housing and the presence of the SINC confirms the importance of wildlife present.

#### **Loss of local habitat and amenity**

5. There have been major species losses in part due to habitat erosion and to fragmentation of important upland settings and Ash dieback. Wildlife corridors must be preserved. Lowland grassland and 80-year old Anthills are indicators of its special status. Other reasons for deleting this site include the impact on the small village centre and Conservation Area. More traffic would spoil the character of this area. Concerns about village regeneration remain valid and future sites needs to be selected with care.

#### **Conclusions for the Plan**

6. Existing consents on this site have lapsed and its deliverability during the Plan period was always questionable. Other Plan objectives are compromised by the allocation, which is out-of-keeping and highly damaging to both wildlife and amenity. Issues relating to landscape and visual amenity should also carry weight. The small number of houses involved could be relocated to windfall sites up to 2031, and to a combination of other existing sites within the built-up urban area of Merthyr Tydfil.

## Local Ecology Significance

7. One third of the proposed housing area is occupied by a patch of U2 unimproved lowland acid grassland with large, active anthills. This succeeded the ancient Sessile Oak woodland clear-fell of the Second World War. Its survival is remarkable, due to a post-war Bungalow, limited public access, low stock grazing, and no known fires.
8. Such U2 grassland is recognised as *Priority Habitat* within the United Kingdom, and the Local Biological Action Plans (see '*Guidelines for the Selection of SINC's in Merthyr Tydfil*', MTCBC and The Merthyr Tydfil Biodiversity Partnership, March 2005).
9. Whilst the late September 2007 Clements Survey made minimal animal records we now know the vole/field mouse population of this grassland is so significant that the *Red Listed* Barn Owl is a consistent visitor, traversing a hill breeding territory between Bedlinog and Llancaiach Fawr, near Nelson in the Borough of Caerphilly.
10. The west of the housing site contains a traditional right of way connecting the old core and Conservation Area of Lower Bedlinog to the former colliery at Upper Bedlinog. This PROW is itself entirely within the Cwmfelin Slopes SINC. To take away its acid grassland hinterlands would seriously devalue the ecological connectivity between the lower village and the upper village's Nant Llwynog Priority Public Open Space and Park. With new-built extensive housing in place a very pleasant unspoilt countryside walk would become a more commonplace, utilitarian connecting route.

## Wider Ecological Significance

11. Over the last decade it has become accepted that the animals, plants and fungi that constitute wild 'Nature' are essential to human well-being. We know nature embraces the organisms that pollinate and fertilise over half of our food crops. Nature also completes the decomposition process ensuring continued soil fertility. Nature's trees and shrubs stabilize slopes, prevent flooding and absorb excess CO<sub>2</sub>. In addition, nature's variety and beauty benefit the mental health of those who walk and play in it.
12. These functions are our Ecosystem Services, to be treasured. And it has to mean places rich in nature demand a maximum of care, and should not be exploited for other purposes without the greatest of consideration.
13. Globally we learn of the minimum daily loss of a 'football pitch' extent of mature tropical rain forest every year since the UN Convention on Biological Diversity in Rio de Janeiro in 1993 (Mag. Roy. Soc. Biol. vol 66, 4, Aug/Sep 2019). In Wales, care of river systems has collapsed in the face of farmland dairy pollution; offshore fish stocks are at their lowest; and grazing intensity on upland farms and commons is at its highest.

## Conclusion on ecology and recommendation

14. We have reviewed the response from the Council and their reasons for removing the Cwmfelin site. We believe the Council has underplayed or misunderstood the ecological aspects of this site. They are in fact of critical importance and have a key bearing on the value of the site. In particular, the singular and rare status of the U2 grassland slopes means the Cwmfelin Slopes SINC must be protected from development.

Jim Davies, assisted by Edward Dawson