

# **ES18.6**

## **BLAENAU GWENT COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION**

### **SESSION 18: MINERALS SITE ALLOCATIONS**

#### **THE COUNTRYSIDE COUNCIL FOR WALES' RESPONSE TO THE INSPECTOR'S QUESTIONS (REF NO:10)**

***1. What are the consequences of identifying land adjacent to Trefil Quarry (M4.1) for expansion on the local environment including heritage interests and the Brecon Beacons National Park? Is this site allocation soundly based?***

CCW commented on the natural heritage interests at this site at the consultation stage to the Deposit Plan, and has provided further comments to the Council and Inspector, including a report commissioned by CCW to assess whether Mynydd Llangynidr continues to be a nationally important geological site, allowing its designation as a site of scientific interest (SSSI,) outlining the importance of the natural heritage features of the site and within close proximity to it. A summary of the key points are therefore provided here.

To summarise therefore, the Preferred Area (M4.1) adjacent to Trefil Quarry impinges upon a number of significant natural heritage feature including

- The Mynydd Llangynidr Geological Conservation Review (GCR) site which was selected in 1982 as part of a nationwide survey of cave and karst features in Great Britain. Following an updated expert review of the site, CCW Directors Team gave officers initial approval to progress a notification as a Site of Special Scientific Interest (SSSI) on 20 April 2012. The final CCW Council decision will be made on either 25 June or 9 July 2012;
- a number of grassland habitats - dry heath, wet heath, unimproved acidic grassland and semi-improved calcareous grassland, which are habitats included in the UK and Local Biodiversity Action Plan, and of significant biodiversity value;
- breeding bird species of conservation concern – Ring Ouzel
- Foraging areas for bird species of conservation concern – the Red Grouse and long eared owl
- Known bat records within 10 km of the preferred area
- Finally, the preferred area is located in close proximity to the southern boundary of the Brecon Beacons National Park (BBNP), where the main purposes of designation is for the conservation and enhancement, of its natural beauty, wildlife and cultural heritage and of promoting opportunities for the understanding and enjoyment of its special qualities.

To inform the decision to notify the SSSI, CCW commissioned an assessment of Mynydd Llangynidr GCR site as a potential SSSI. The assessment confirmed that Mynydd Llangynidr contains the finest array of collapse (caprock) dolines and subsidence basins anywhere in Britain, and clearly demonstrates the surface geomorphic effects of interstratal karst. As well as being the best of its kind in Britain, the site is also considered to be of global importance.

The value of the interstratal karst lies in both the individual landforms and the fact that within the boundary of the proposed SSSI (pSSSI) (Map 1) the density and variety of caprock dolines is unsurpassed anywhere in Britain.

The special interest of the pSSSI therefore derives from both the individual landforms within the pSSSI site and the density of the caprock dolines.

The dolines (both caprock and normal 'solution' dolines) in the allocated site were not fully reflected in the indicative Geological Conservation Review (GCR) boundary that was originally drafted, and following further survey it is now proposed to correct those imbalances by proposing a new GCR/pSSSI boundary that contains all of the interstratal karst interest features that have been identified by the assessment of Mynydd Llangynidr. The indicative boundary drawn in 1982 also included areas with no dolines. These have now been removed from the revised GCR/pSSSI boundary.

The pSSSI includes the land adjacent to Trefil Quarry identified as a preferred area for aggregate extraction in the LDP, Policy M4.1. Should the land be identified in the LDP it would establish the principle of mineral extraction at the site and the irrevocable loss of over 70 caprock dolines, which are an integral part of the pSSSI.

As well as being important geologically, as outlined above the site also has considerable biodiversity value. Currently it consists of dry heath, wet heath, unimproved acidic grassland and semi-improved calcareous grassland, which are habitats included in the UK and Local Biodiversity Action Plan, and of significant biodiversity value. We consider that extraction and associated development is likely to lead to the direct loss of habitat or disturbance to any retained habitat through the deposition of dust, storage of materials and alterations to the hydrological regime. Whilst mitigation may minimise the effect of these disturbances on adjacent habitats, the direct loss of habitats at this site will be irrevocable, and cannot be mitigated for.

Additionally, extraction in the preferred area will have a detrimental impact on many of the breeding bird species found in the area. These impacts will be more severe on species which are already under great threat, such as the Ring Ouzel. This species nests in rock screes and crevices and feeds on moorland berries and insects. The impact would be a proportional loss of the habitat available.

The preferred area is also frequented by red grouse and long eared owl, both of which use the area for foraging. Both species are of conservation concern and only found in a few areas across Blaenau Gwent. The red grouse found here is at its most southerly range in the UK. Similarly the impact will be a proportional loss of habitat

Finally, the preferred area is located in close proximity to the southern boundary of the Brecon Beacons National Park (BBNP), where the main purposes of designation is for the conservation and enhancement, of its natural beauty, wildlife and cultural heritage and of promoting opportunities for the understanding and enjoyment of its special qualities. Consideration will therefore need to be given to detailed methods of working and the location of storage mounds as well as the obvious extraction of the stone, so that the landscape, visual and general amenity of the many users of this open access area are not unduly affected.

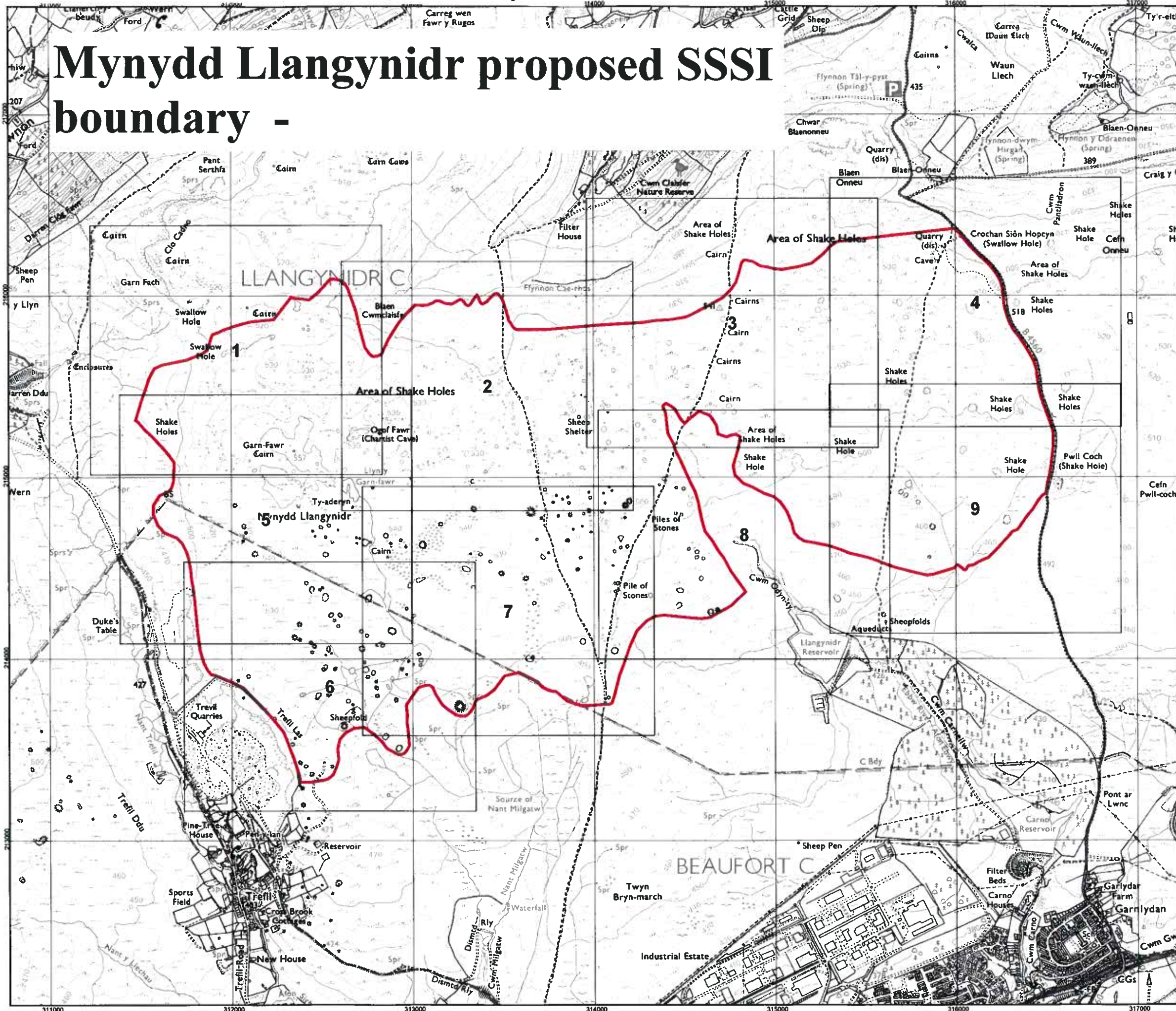
To conclude therefore, CCW consider that the consequences of identifying land adjacent to Trefil Quarry (M4.1) for expansion would be to have significant detrimental effect on the special interests and qualities of the local environment including biodiversity and geological interests and the Brecon Beacons National Park, and will include irrevocable losses to interests of international and national significance. As the proposal would result in significant harm to interests of

acknowledged importance, contrary to national planning policy, it is not considered that the allocation is soundly based.

***2. What is the logic for identifying Tir Pentwys Tip (M4.2) as a preferred area for aggregates? Is this site allocation soundly based?***

No comment.

# Mynydd Llangynidr proposed SSSI boundary -



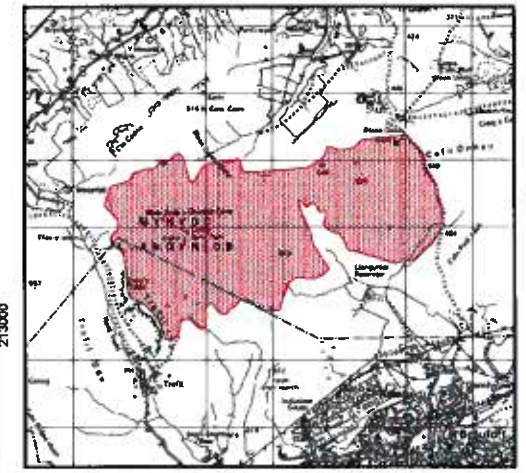
## MYNYDD LLANGYNIDR

Powys  
Blaenau Gwent

Map 1 / 1

- Safle o Ddiddordeb Gwyddonol Arbennig  
Site of Special Scientific Interest
- 1:5000 Graddfa  
Scale
- 896.80 ha Arwynebedd  
Area
- Hysbyswyd  
Notified
- Cadamhad  
Confirmation
- 3159 Rhif y safle  
Site id

Nodyn: Data wedi ei gipio ar raddfa 1:2,500 a'i leihau i raddfa 1:20,000.  
Note: data captured at 1:2,500 scale and reduced to 1:20,000.



Allynhychwyd o fap Ordnance Survey gyda chariatad Rheolwr Swyddfa ei Mawrhydi. Cedwir hawffraint y Goron. Rhif drwydded Cyngor Cefn Gwlad Cymru 100019741 2011.  
Reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office. Crown copyright reserved. Countryside Council for Wales Licence No. 100019741 2011.