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LANDSCAPE ARCHITECTURE LANDSCAPE PLANNING URBAN DESIGN

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Justification for Deletion of SLA Designation at Bryn Quarry, Gelligaer (Policy NH1.3 of Deposit LDP)

1. Introduction

- 1.1 Anthony Jellard Associates have been commissioned by the Bryn Quarry Group to carry out a review of the inclusion of the area around Bryn Quarry in a Special Landscape Area – ‘Mynydd Eglwysilian’ SLA - which is proposed in the Deposit Local Development Plan (Policy NH1.3 refers). ‘Mynydd Eglwysilian’ SLA is named after the mountain some 4kms south of Bryn Quarry.
- 1.2 We comment on best practice methodology for defining SLA’s and discuss the methodological robustness of the Council’s proposed boundaries as they apply to the Bryn Quarry area between Nelson and Gelligaer.
- 1.3 This study has been carried out by David McQuitty and Rob Malcomson. David McQuitty, M.L.I., Dip. L.A. B.A. Hons, has been involved in a wide range of commissions such as strategic landscape advice for major rural and urban design projects including reservoir sites, quarrying, housing developments and Environmental Impact Assessments. He has lectured on Landscape Design and Practice at the Architectural Association, Sheffield University and Oxford Brookes University. He has been a member of the Environment Committee of the Landscape Institute and has provided landscape architectural advice to the operator of Bryn Quarry in respect of recent planning application submissions in relation to the existing waste management facilities at the representation site. Rob Malcomson, M.L.I., M.Phil., B.Sc. has over 15 years experience of landscape design and Environmental Assessment, in both public and private sectors, and has assisted in the preparation of landscape evidence for Planning Appeals in both England and Wales. He has been the Visual and Sensory Aspect Specialist for numerous LANDMAP assessments, and prepared the Landscape Character Assessment for Pembrokeshire Coast National Park.

2. Current Best Practice for defining SLA's

- 2.1 The current best practice for establishing SLA's is set out in the LANDMAP Special Landscape Area Guidance Note CCW 2008 that confirms that:

*In identifying SLAs, consensus with or divergence from, existing SLAs may occur. The purpose of the review of a local landscape designation is to re-examine the case for SLAs in the context of updated and consistent LANDMAP information. **Existing SLAs cannot be automatically lifted into a new LDP. A review of existing SLAs is recommended for inclusion in a LDP*** (our emphasis)

We would note that the area around Bryn Quarry has never been included in any previous SLA's pursuant to the current Development Plan.

- 2.2 The guidance describes the methodology in identifying SLA's as below:

*'The broad search areas are determined from the five LANDMAP Evaluated Aspects: the Geological Landscape, Landscape Habitats, Visual & Sensory, the Historic Landscape and the Cultural Landscape. **The LANDMAP overall evaluation score and LANDMAP evaluation criteria for each evaluated aspect layer will be particularly informative at this stage.***' (our emphasis)

We would note here the emphasis LANDMAP places on the multiple layers of interest that make up a full understanding of landscape character.

3. Review of Values for all LANDMAP Aspect Areas within the Representation Site

- 3.1 Given that LANDMAP evaluation scores are key to determining SLA boundaries we have analysed the scores of all the aspect areas that lie within the site area. These are as follows:

CL056 High, Low, Low, Outstanding, High, Low, High, not assessed, and overall **High**

GL009 Moderate, Moderate, Low, Low, Low, and overall **Moderate**

HL695 [Majority of site] High, Moderate, Moderate, Moderate, High and overall **Moderate**

LH133 High, Moderate, Moderate, High, Moderate, High, High, High, and overall **High**

VS143 Moderate, Moderate, Moderate, Moderate and overall **Moderate**

- 3.2 These scores – 2 High and 3 Moderate – are markedly lower than the scores within the main area of the proposed 'Mynydd Eglwysilian' SLA. The main part of this SLA is several kilometres to the south and here the landscape values are much higher as can be seen below.

CL056 valued as **High** [as above a very large aspect area]

GL small areas of 010/011/015 valued as **Outstanding, Moderate and Moderate**

HL878 valued as **Outstanding** [Outstanding x 3, High, Moderate]

LH141 valued as **High** [High x 4, Moderate x 4]

VS317 valued as **High** [High x 3, Moderate]

- 3.3 We would also note that the overall scores within the proposed 'Gelligaer Common' SLA (see below) approximately 0.5km to the north of the site are of a similar overall value to the main area of 'Mynydd Eglwysilian':

CL051 valued as **Outstanding** [Outstanding, High x5, Moderate, Low, not assessed]

GL 008 valued as **Moderate** [Moderate, Low x3]

HL831 [central and north] valued as **Outstanding** [Outstanding x 4, Moderate]

And HL634 [southern area] Outstanding, Outstanding, High, High, Outstanding and overall **Outstanding**

LH112 valued as **High** [High x 3, Moderate x 4, not assessed]

VS404 valued as **High** [High x 2, Moderate x2]

This emphasises the fact that landscape values on the Bryn Quarry site and in most its immediate surroundings are substantially lower and, of themselves, would not appear to justify SLA designation.

4 Our comments on the TACP report commissioned by CCBC to determine proposed SLA's (January, 2008)

- 4.1 TACP carried out a study of potential SLA's for Caerphilly Council based on CCW guidance. This study was limited by the lack of available Historic Landscape Aspect data for the 'Mynydd Eglwysilian' area.
- 4.2 It is worth noting that statement SB47 CCBC Designation of SLA's records that 'whilst boundaries have been groundtruthed through field survey, the boundaries may require further refinement through the LDP process'. Caerphilly Council therefore recognise that adjustments to proposed SLA boundaries are a possibility as part of the LDP process.
- 4.3 It does not appear that that the Historic Landscape aspect area was used to refine the boundaries during the LDP process as required/stated at section 3.4 p11 of the TACP study. The 'Historic' section of the 'Primary Landscape Qualities' was left blank in the TACP study. This is also the case for the LDP Appendices to the Written Statement which are based closely on the TACP work.
- 4.4 TACP themselves acknowledge in para.3.3.5 p 9 of their report that 'lack of evaluation of Historic Landscape except for 'outstanding' undermines their contribution [the contribution of the historic data] to the process'. With other Aspect layers in the main part of the 'Mynydd Eglwysilian' SLA rated as 'outstanding' or 'high' it is perhaps reasonable to conclude that the consultants might have expected high values for the historic layer as well. Whilst this is true in part for the main heart of the SLA around Mynydd Eglwysilian, the HL data does not support the designation of an SLA in the vicinity of the Bryn Quarry site where the value is only 'moderate'.
- 4.5 Finally the TACP report confirms the importance of the value of the underlying aspect areas:

'The methodology does not specify the number of outstanding high aspect areas required for the designation of a SLA, it is apparent that the greater the number, the stronger the rationale for designation. Conversely, the fewer the number, the more clearly the designation has to be justified.'

Crucially the TACP also refers to the question of how to use aspect areas of 'moderate' value:

'In developing the methodology for designating SLAs, emphasis

*has been placed on using most aspect areas evaluated as 'Outstanding' and 'High' as the basis for their designation. Whilst all parties accept this approach, within the LANDMAP Information System the definition of the 'Moderate' evaluation level is "locally important". It has been argued that by definition this matches the concept of a SLA. However, the majority of the local authority area is evaluated as "Moderate" with the exception of the Cultural Landscape aspect topic layer (see Figure 6.0). **Therefore to use the 'Moderate' aspect areas as part of the core of designating SLAs would result in the majority of the Borough being given that designation. This would both devalue the policy designation but also go against the guidance in Planning Policy Wales.*** [our emphasis]

Whilst we note the reference to 'as part of the core' – and this is certainly the case with this SLA at Mynydd Eglwysilian – it is our opinion that the inclusion of land in the representation site area, within the proposed SLA, of lower [3 of 5 Aspects are 'Moderate'] value is not justified.

5. Conclusions

- 5.1 Therefore, it is our opinion that there is little justification for the SLA designation in the site area – particularly with reference to the LANDMAP values where 3 of 5 are 'moderate' – a key determinant in the SLA designation process. The core area of the proposed 'Mynydd Eglwysilian' SLA has substantially higher values and is in many ways a separate landscape character area.
- 5.2 The lack of the data on the historic landscape at the time of the TACP study was, in our opinion, an important deficiency.
- 5.3 It is our opinion that the correct northern boundary for the SLA should be drawn along the A472 in the small valley approximately 1.5km south of the proposed site. We note that the boundary between the Historic Landscape Aspect Areas CYNONHL290 [High value] and CYNONHL695 [Moderate value] also follows the A472.

Appendix 1 Extract from Deposit Local Development Plan proposed SLA within which development would be sited

NH 1.3 MYNYDD EGLWYSILAN

Relevance against Strategic Criteria

Need

- *The area, whilst consisting of two distinct landscape types – open uplands and lowlands – represents an important landscape unit adjacent to the populated Rhymney Valley in the east and the Cynon Valley to the west.*
- *This provides a wider landscape setting and context for the settlements of Nelson, Ystrad Mynach, Llanbradach, north Caerphilly / Bedwas, Abertridwr and Senghenydd.*

Coherence

- *The boundaries reflect a coherent landscape unit abutting Rhondda Cynon Taf to the west and settlement boundaries to the remainder of its area.*
- *The two landscape types have an intervisibility that justifies their inclusion in one SLA and form the visual context for settlements in and around the area.*

Consensus

- *Equates partially with a landscape area identified in the Rhymney Valley Landscape Strategy.*

Primary Landscape Qualities and Features

Cultural Landscapes

- *This is a multi-period landscape, with emphasis on 19th and 20th century development as industrial and residential communities emerged in the immediate and surrounding areas. Some evidence of historic and contemporary human occupation and exploitation in the form of prehistoric monuments, redundant industrial workings and transport systems is present throughout the area.*

Landscape Habitats

- *Agriculturally improved grassland with patches of broadleaved woodlands and bracken. Both upland and lowland areas are heavily grazed. This is preventing the spread of bracken, but is also preventing the improved grassland areas from increasing in ecological value.*

- *Semi-improved grassland, marshy grassland and flushes, dry heath/ acid grassland mosaic and areas of blanket mire occur throughout the SLA.*

- *Significant features found within the SLA include; ponds, hedgerows with mature tree species, unimproved acid grasslands, marshy grassland, bracken, European Protected Species, UK protected species and LBAP priority species and habitats.*

Geological Landscape

- *Glacial mountain valley. Southerly Valley dissected through Pennant sandstones (Upper Carboniferous) extensively filled with drift. Glacial sand/gravel in lower valley, with eskers at Abertridwr.*

- *Major colliery tips, some restored & several closed mine shafts.*

Visual and Sensory

- *This is not a remote landscape due to the proximity of the valleys to their associated urban areas. The upland ridge is open with panoramic and sometimes dramatic views over upland and adjoining valleys. A pleasant landscape, with some attractive rolling farmland away from the built form of urban edges.*

- *Land cover is predominately rough grazing with bracken. There is a mixture of boundary treatments across the SLA. Rolling farmland hedgerows and stock proof fencing are the predominant boundary treatments, although there are some traditional stonewalls present.*

- *Some visual clutter of pylons slightly detracts from this otherwise wild/exposed typical upland area with a strong sense of place.*

Historical Landscapes [no information given]

Key Policy, Management and Development Control Issues

Long Term

- *Future development proposals should not see the loss of any historic environment or geological or geomorphological features present within the landscape. A wealth of archaeology from all periods, especially the Industrial/Modern period is present and should be protected.*

- *Care should be taken not to subsume past cultural attributes beneath pressures for expansion and regeneration - Plan and allow expansion compatible with the ability of the area to contain such pressures.*

- *Prevent the area becoming cluttered with incongruous vertical elements, including pylons and turbines.*

- *Prevent the loss of habitats, both upland and lowland which contribute to the character of the area - Ensure that valuable habitats are not lost.*

- *Longer term management of forestry plantations around Llanbradach with consequent effect upon visual qualities of the landscape.*

Medium Term

- *Hedgerows and stone walls should be protected, maintained and enhanced.*
- *Restrict urban spread in to the countryside and soften the existing urban edge.*
- *Encourage reduced grazing - Stock grazing will prevent the grassland from reaching*

higher levels of ecological value. Possibly introduce the Tir Gofal scheme or current equivalent to the area. Prevent habitat fragmentation between grassland types.

Immediate

- *Encourage the reduction of grazing in the most sensitive landscape habitat areas and*

Landscape and Visual Appraisal

increase grazing in areas dominated by bracken to reduce the spread.

- *Investigate the condition of habitats and implement management plans where appropriate.*
- *Minimise and remove visual landscape degradation including fly tipping, burnt/dumped cars, littering and illegal off roading.*