

INTERNAL MEMORANDUM

To: David Cross
Re: Planning Application P/19/0073
From: Landscape Architect
Ask for: Tom Bramley
Ext: 6276

Date : 8th April 2019

Provision of 36 camping pods and 5 chalets, erection of shower/toilet block and creation of play and picnic area. Construction of new parking area (141 spaces) with overflow carpark (85 spaces), together with a trail maintenance yard, new highway access routes, ground profile works, drainage,, infrastructure and landscape works at Bike Park Wales Gethin Woodland Centre Abercanaid

The above application consists of an extension to the current facilities at Bike Park Wales in line with the description outlined above.

In consideration of the application an EIA was prepared for the proposed development. In matters concerning the landscape the following chapters are of particular pertinence:

- Chapter 3 Site Description
- Chapter 4 Development Description
- Chapter 6 Ecology Assessment
- Chapter 7 Landscape and Visual Impact Assessment
- Chapter 8 Summary of Residual Impacts

It is noted that no Cultural / Archaeological Chapter was prepared for the EIA and that references to historical landscape are contained wholly within Chapter 7. Each chapter is accompanied by an appendix of further related text, photographs, plans and scale drawings.

The Study Area

The EIA does not establish a wider study area than that of the site itself, therefore an assessment of baseline landscape character is fairly limited.

The site falls within the following statutory and non-statutory designations:

Landscape Character Areas

The site sits within the LANDMAP derived Landscape Character Area 11/3 'Merthyr West Flank South' which characterises the area. The site is formerly Gethin Woodland Park which is preserved for informal recreation facilities. The area has a patchwork of positive visual, historic and biodiversity qualities and abuts the western edge of the town and contains a length of the A470 trunk road.

The site is part of a critical edge to the town in terms of first impressions for visitors. The subtle mix of landscape types within this area are vulnerable to large scale change. The clear views of this area from the A470, the valley floor and the Merthyr basin may be found.

Management guidelines aim to protect, conserve and enhance visual, historic, cultural and biodiversity values of the area by:

- Enhancing the approach to Merthyr along A470.
- Extending woodland to integrate settlement edge, including key development sites, while retaining mosaic character.
- Retaining diversity of mosaic through vegetation management and limited reclamation.
- Improving the recreational value of Gethln Woodland Park.
- Considering impact of potential development on A470.

Actions relating specifically to the site include:

- Developing management plan for whole area including nature conservation, heritage, recreation and access strategies.
- Carrying out recreation strategy for the former Gethln Woodland Park including improving accessibility.

Tree Preservation Orders

The site is covered by Woodland Tree Preservation Order No 4 Abercanaid Woodland. The tree preservation order in this instance covers the whole woodland and applies to trees of any size or species. The order protects trees and saplings of any size in the specified area, including those planted or grown after the order was issued. The purpose in this instance is to preserve the woodland as a whole, the objective being to maintain the appearance of the landscape. No woodland management should be carried out without a management plan. Any work planned whether coppicing or tree felling or clearing the sides of track or paths requires the submission of a management plan to the LPA.

Merthyr West Flank Special Landscape Area (Draft)

The site is wholly within the proposed Merthyr West Flank Special Landscape Area; the SLA has a draft non statutory designation within the replacement Local Development Plan. Designation aims to encourage good management practices in the future restoration of landscape features physical, flora, fauna and archaeological remains. It will support the replacement LDP policy framework which will seek to improve environmental well-being through habitat improvement and protection and enhancement of the character and appearance of the landscape. It will also ensure that any development permitted within the SLA respects the landscape quality present.

Sites of Importance for Nature Conservation

Both Abercanaid Fields (SINC 20) and Craig Gethin (SINC 30) are affected by the proposed development. Details of the nature of the effect of these proposals are found within Chapter 6.

Merthyr Tydfil Landscape of Outstanding Historic Interest

The Historic Landscapes Register provides a first step, national overview of the historic content of the Welsh landscape. Merthyr Tydfil Landscape of Outstanding Historic Interest is one of the areas of Historic landscape covered by the CCW / Cadw / ICOMOS UK Part 2.1 Register of Landscapes of Outstanding Historic Interest in Wales and the Part 2.2 Register of Landscapes of Special Historic Interest in Wales. This involves the identification of geographically definable and mapable areas of historic character, as determined by the range and distribution of surviving archaeological and historical features and the main types of historical land use patterns or historic 'themes' that have shaped the area. The key historic characteristics of the area are then identified along with recommendations for their positive management.

The site falls within Historic Landscape Character Area HLCA072 which is one of the character areas of the Merthyr Tydfil historic landscape and is described thus: 'Waunwyllt. Pen-y-Lan and Graig Gethin Agricultural landscape of dispersed post-medieval settlement associated with upland sheep farming; irregular evolved field pattern of drystone walled-enclosures largely hidden in forestry; Ancient Woodland and 20th century forestry; extractive landscape associated with the steam coal trade.'

Policies relating to access to the countryside

Policy BW16: Protecting /enhancing the network of leisure facilities

The Council will protect and support the enhancement of the County Borough's network of leisure facilities including outdoor play space, public open space and public rights of way in order to ensure their continued use for recreation and amenity. Development proposals that result in the loss of an existing facility will not normally be permitted unless:-

- Alternative provision of at least equivalent value to the local community can be provided nearby, or
- It can be demonstrated that existing provision is inappropriate or surplus to the needs of the community and is no longer required, or
- In the case of commercially based leisure facilities, it can be demonstrated there is no longer a viable leisure use for the facility.

Planning Policy Wales

Edition 10

Fig 4: The National Sustainable Placemaking Outcomes refers to:

Facilitate accessible and healthy environments:

- Accessible and high quality green space
- Accessible by means of active travel

- and public transport
- Not car dependent
- Minimises the need to travel
- Provides equality of access
- Feels safe and inclusive
- Supports a diverse population
- Good connections
- Convenient access to goods and services
- Promotes physical and mental health and well-being

Maximising Environmental Protection and Limiting Environmental Impact:

- Resilient biodiversity and ecosystems
- Distinctive and special landscapes
- Integrated green infrastructure
- Appropriate soundscapes
- Reduces environmental risks
- Manages water resources naturally
- Clean air
- Reduces overall pollution
- Resilient to climate change
- Distinctive and special historic environments

Implications of the proposed development on landscape quality

Parking and Roads

The use of crushed stone will be utilised for the site infrastructure layout of the parking roads and hard standings. Large scale excavations and bladed machines will excavate material to a depth of 400-600mm to formation levels.

All parking should be permeable surface with adequate fall for exceedance flows to reach the ditch/soakaways in high rain events.

All the permeable surfaces need to be appropriate for the activity that they support. Permeable surface for disable parking should be adequate for effective wheelchair use. Permeable surfaces in overflow parking should be vegetated to provide green vegetated habitat when not in use. Permeable surfaces for busy parking areas should include a layer of treatment media to capture soluble metals before it passes down into the ground.

Additionally the proposals do not specify:

- How, where and to what height the excavated material will be stockpiled.
- How the retained trees will be protected during the construction phase through a tree protection plan.
- How will excavations take place in the vicinity of tree roots, no dig, precautionary hand dig, precautionary dig?

- What the details of the ditches (900 deep x 500mm wide) consist of. Are they acting as ditches or French drains? If drains, where is the proposed drainage system that they feed into?
- The measures to be put in place to prevent run off from silt and what pollution protection measures will be put in place during the construction phase.
- The impact of excavations on the water table and consequently tree roots or the rooting environment for wetland species?
- Details for the use of grasscrete.
- A full specification for the ground preparation, planting and a lengthy aftercare period for the proposed planting intended 'screen and assimilate the infrastructure'.
- The measure to be put in place to prevent oil, petroleum, diesel spillages and leaks from vehicles from percolating through the hard surfacing and polluting drainage and permeating the wider root zone for vegetation (see above).

Pods and Chalets

The formation level of the pods are to be formed by removing the organic material rich layer from the surface to an unspecified depth until a relatively firm topsoil base is reached. The newly introduced chalets and their associated surfacing will lead to further water run off than that which is currently received by the site.

No details are available of:

- The visual impact of the chalets and pods within the existing landscape in the form of a photomontage; thereby indicating scale and massing.
- How will excavations take place in the vicinity of tree roots, no dig, precautionary hand dig, precautionary dig?

Lodges

The excavations for the creation of lodge buildings are proposed as 600mm depth beneath the existing ground level.

- It is unclear what the longer term effect will be on the tree root zone.
- How will excavations take place in the vicinity of tree roots, no dig, precautionary hand dig, precautionary dig?

Shower Block

Excavations for this facility will amount to a depth of 750mm, there are no measures proposed for the following:

- Tree root protection zone
- How will excavations take place in the vicinity of tree roots, no dig, precautionary hand dig, precautionary dig?

Foul Water and Hydrology

Foul water, drainage and hydrology are among the most concerning aspects of the proposed scheme. Generally there exists lack of clarity and specific detail with assumptions made on the submitted drawings which fail to deliver assurances that the installation of pipes, ditches, soakaways and drainage runs will not lead to pollution incidents arising from lack of capacity, unknown hydrological seepages and wider movement of spills, leaks and overflows. Such issues have the potential to lead to further degradation of the collection of water flow on the lower slopes ultimately affecting the quality and nature of both the designated SINC and the Webbers Pond. Depth of excavations for connections to a new underground foul water pipes and proprietary cesspit tank as well as the tank itself remain unspecified. Damage to existing tree roots and the assessment of existing trees in relation to the areas of excavation for such services remain unknown.

Ditch soakaways for the van-parking and these ditches could contain clean stone and treatment media to capture the pollutants. Consideration should be given to including oil sorbent cobs to address oil spillages.

Management of the washing down of bikes should be monitored rigorously and be restricted to the designated bike washing areas.

Bike wash water should not be directed to the foul water treatment system. The lubricants, oils and dirt-sediment it contains are not appropriate for treatment in a sewage treatment facility. It will adversely affect the performance of the package sewage treatment plant and so reduce the effectiveness of the sewage treatment.

The sewage effluent poses the highest risk of pollution (borne out by current effluent pollution incidents). The environment should not be subject to high levels of nutrients being put into the watercourses.

The bike wash water should be dealt with separately using a bespoke facility.

Utilities

The position of utility supplies to particular facilities is an unknown feature of the proposed development.

- It is uncertain whether there is one trench for all utilities or several, typically 1100mm deep and 500mm width.
- It is unknown whether trees will be affected or where the tree protection zone is.

Trail Maintenance Yard

Within the tool wash down facility where will the waste water with oils and petroleum products be captured and filtered?

Mitigation

Current proposals rely almost entirely on the introduction of extensive tree and shrub planting to mitigate the extent of development. The scale and nature of the proposed development is such that the extent of the proposed tree planting extends throughout much of the site. While the proposed planting of trees and shrubs is to be welcomed, past experience of the original application demonstrates a failure to fulfil planning conditions as acknowledged in Volume 2 Chapter 7 8.5 General character, cultural and sensory aspects of the landscape; Landscape and Visual;

'other areas not already shown on the masterplan as being planted should also be assessed for suitability for additional planting. Those areas which have seen some reduction in mature tree conditions and numbers since 2012 or have not been planted in accordance with previous proposals or planning conditions, should receive additional planting'

Planting to screen and visually assimilate infrastructure

Drawing 19/461/05B 'Bike Park Wales – Landscape Strategy' has been prepared in order to demonstrate the extent to which it is proposed that tree planting is intended to mitigate for the scale and visual intrusion of the development.

The proposed development will inevitably lead to a loss of character through the removal of meadow, woodland understorey, trees both young, semi mature and mature. There will, as things stand be a significant damage to the root zone for those trees that remain and subsequently the long term health of the remaining trees will be negatively affected. The Sites of Importance for Nature Conservation will also be significantly negatively affected with habitat loss.

As part of an attempt to mitigate for this the development proposes a large number of trees (illustrated as small circles). The landscape specification for this planting is absent and therefore unacceptable. Furthermore there are references to the extensive use of herbicides as a preparatory measure prior to the planting of trees and shrubs; this too is completely unacceptable on an ancient / semi natural woodland site and will destroy all flora it comes into contact with. In addition to the lack of details over the proposed planting there is the absence of a management plan for their establishment. The site is a Woodland TPO; only works that are conducive to maintaining its favourable status as woodland are acceptable the proposed development fail to achieve this.

Zone of Theoretical Visibility

A ZTV has not been prepared as part of the Landscape and Visual Impact Assessment. Our own internal assessment carried out based on an average height of 2.5 metres for all structures proposed (attached), demonstrates a 3.5km radius of potential visibility with the development. Taking a look at the most likely areas of visual capture (location and elevation) the following suggested areas would require a more detailed analysis including a projection of the development within a proposed photomontage:

1. Duffryn Road Pentrebach CF48 4BS
SO 06430 03721

2. A4060, Mountain Hare, Abercanaid, Merthyr Tydfil, Wales, CF48 4AJ,
SO 06145 05806
3. Seat outside Co-op, Trevithick Trail, Pentrebach CF48 4ND
SO 06159 04180
4. A470 looking north west on approach to the roundabout, CF46 5PE
SO 06164 03016
5. Taff Trail, Abecanaid CF48 1YT
SO 05385 04056

The new parking areas and roads serving the development will increase the hard standing area of the site overall by 37%. This amounts to a significant loss of tree cover, meadow and wider forest floor. Such a loss will have more than a physical effect. Coupled with the high percentage loss will be erosion of favourable forest conditions for a healthy forest ecosystem, but degradation and despoliation of forest soils, the introduction of large volumes of alien materials for surfacing will raise the pH locally through the introduction of cementitious materials drying out areas that were previously wet environment and lowering humidity. The net effect will not be felt immediately and while projected images of the woodland accommodating the development will portray a healthy environment for the development, the health of the woodland and its environs will increasingly quickly decline. Such a decline will lead to further gaps opening up within the trees as further larger specimens are adversely affected and die. As the gaps open up the relatively visible distant views of the site as continuous forest cover will gradually emerge and the development will become more and more apparent in the view. While it is acknowledged that the proposed development intends to be accompanied by introduced planting of native trees and shrubs, these will not be able to replace the natural regeneration that would have existed as the soil health will have been so disturbed the long term character of the woodland will change, thereby affecting historic landscape character. The loss of character will be augmented by the rich areas of meadow species. A green roof over some of the peripheral parking bays so that the forest fauna has some additional surface area to live on might be one method of mitigation for several hundred square metres of lost forest-floor and plastic geogrid might be considered as an alternative solution to surfacing; however there have been no alternative considerations for mitigation suggested. The likely increase in run off rates will necessitate the need for a viable SUDs scheme.

Whilst it is acknowledged that attempts have been made to describe the likely visual impacts from within the site, there are few montage representations of how the development might appear. Tested inter-visibility from selected viewpoints might have an adverse effect upon those who live, work or move within the landscape and therefore requires closer inspection.

It is concluded that without significant address to the issues highlighted above, in its current format the details provided indicate that the proposed development would be unacceptable. The information required might potentially enable a more rigorous assessment of the impact of the proposed development on landscape character and elicit a more sensitive, thorough and imaginative response in the shape a development of this nature takes.

Kind regards

Tom Bramley – Landscape Architect



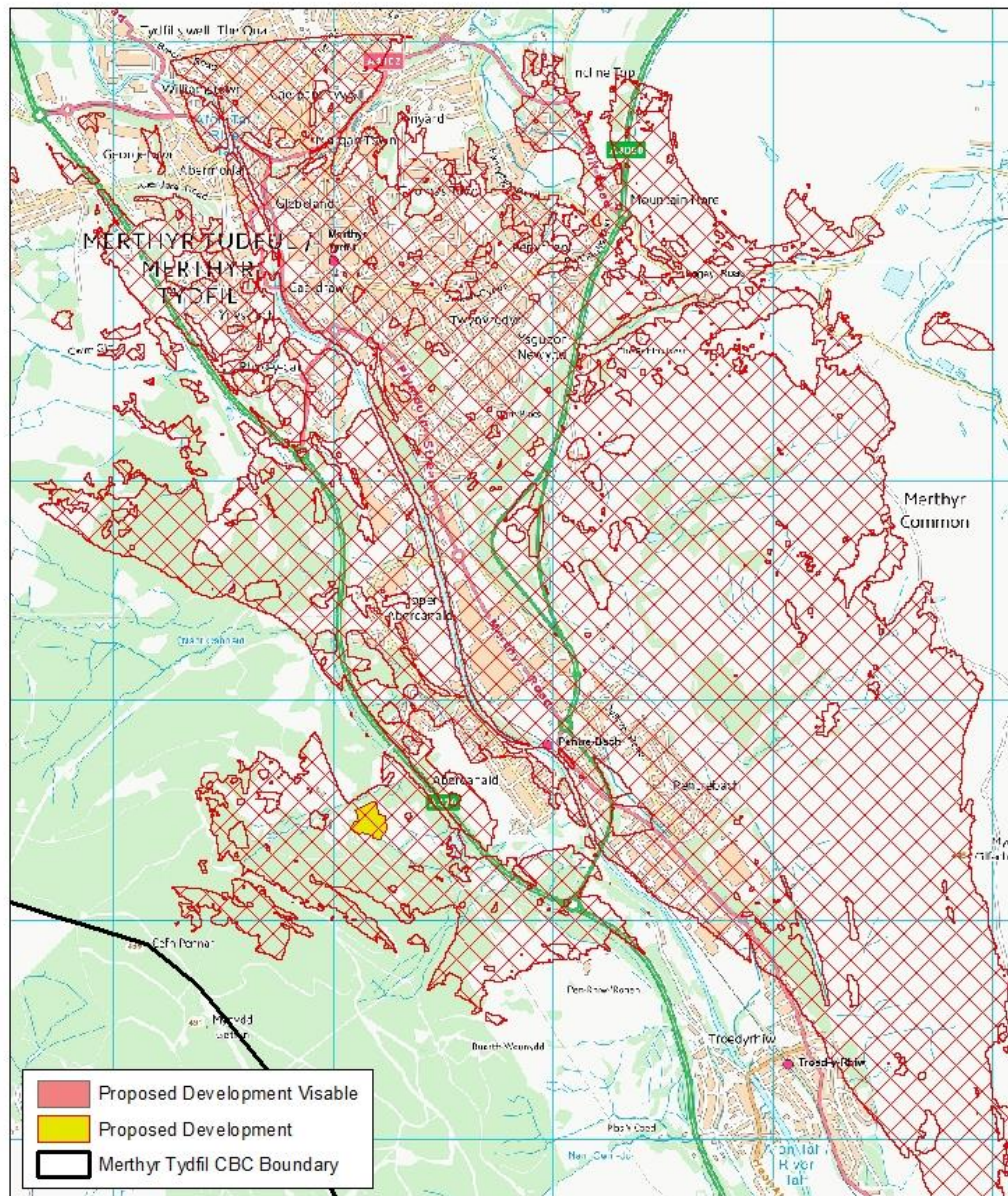
Merthyr Tydfil County Borough Council

Bike Park Wales Proposed Development - 3.5km Radius Visibility Study

Scale: 1:24,000 at A4

Date: 02/05/2019

Department: Planning and Countryside



Visibility study calculated with elevated 2.5m height for proposed development out to a radius of 3.5km
Derived from 5m Digital Terrain Model (DTM). Surface features not included in analysis.

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NOT TO SCALE