




Date 11th August 2023



Planning Inspectorate Wales
Crown Buildings
Cathays
Cardiff
CF10 3 NQ

Dear Sir/Madam,

LPA – Merthyr Tydfil CBC – Application number P/23/0065 Land to the south-west of the A470/A4102 roundabout at Rhydycar, Merthyr Tydfil


Outline planning application for an erection of a mixed leisure development etc

I am writing to request that you call in the above outline planning application for determination should Merthyr Tydfil CBC be minded to vote to approve it.


The reasons for calling in the application can be found in my letter dated 6th July 2023 addressed to Merthyr Tydfil CBC which is attached.

Yours faithfully,





Date 6th July 2023



Planning and Neighbourhood Services
Merthyr Tydfil County Borough Council
Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

Dear Sir/Madam,

P/23/0065 Land to the south-west of the A470/A4102 roundabout at Rhydycar, Merthyr Tydfil

Outline planning application for an erection of a mixed leisure development etc

This is my letter, **objecting** to the above planning application, setting out my concerns about the development.

The proposed development at Rhydycar West is seeking Outline Planning Permission for the erection of a mixed leisure complex comprising:-

- 1) An indoor snow centre (up to 39,200 sqm)
- 2) A Water Park (up to 7,500 sqm)
- 3) An Indoor Activity Centre (up to 9,000 sqm)
- 4) Outdoor Activity Areas (land take unspecified)
- 5) Hotel Accommodation (up to 418 bedrooms, land take unspecified)
- 6) Forest Lodge Accommodation (up to 30 units, land take unspecified)
- 7) Car Parking Spaces (up to 830 spaces, land take unspecified)

8) Earthworks, Access, Drainage, Servicing and utility connections/infrastructure

No estimate is given on the full size of the land required to accommodate the facilities detailed above.

The magnitude of the proposals is a significant departure from the Merthyr Tydfil Adopted Local Plan on a greenfield site outside of the defined settlement boundary in open countryside and in my opinion should have been advertised as such.

The location identified as Rhydyar West contains the Cwmglo/Glyndyrys Site of Special Scientific Interest and the Cwmglo Site of Importance for Nature Conservation.

Sites of Scientific Interest (SSSI) and Sites of Importance for Nature Conservation (SINC) are protected from the inappropriate development inherent in the proposals.

The unique features of nature conservation, historic/heritage interest and landscape importance of Rhydyar West will be seriously damaged/lost if this proposal is allowed to proceed.

The developer states that only 6 hectares of the Rhydyar West site will be used to accommodate their proposals.

This loss is totally unacceptable.

There is a presumption against development outside of the settlement boundary which would result in any loss of biodiversity, historic/heritage interest and sense of place, making the proposals contrary to National and Local Planning Policies.

Heritage features are a finite resource. When lost, they are lost forever, with a decline in sense of place.

A similar loss to biodiversity has; much in common with historic loss.

Rhydyar West is the largest relatively intact remnant of the iconic Cyfarthfa Mineral Lease and its association with Crawshay, Cyfarthfa Castle, The Cyfarthfa and Ynysfach Ironworks.

To my mind it should have been included in the Cyfarthfa Heritage Area. It contains 8 Scheduled Ancient Monuments and c400 Industrial/Archaeological artefacts of Local and National Importance.

Reference should be made to the Planning Inspectors Report and Recommendations on the Merthyr Village Planning Application which was supported by Welsh Government.

It was unique in the composition of the organisations opposing the scheme:-

- 1) The Countryside Council for Wales
- 2) CADW
- 3) Merthyr Tydfil CBC Planning Department
- 4) South and West Wales Wildlife Trusts
- 5) Merthyr Initiative Group
- 6) Rhydyar Regeneration Partnership
- 7) Merthyr Tydfil Heritage Trust

This current application submitted by Marvel has much in common with that application with regards to:-

- 1) Substitute Snow Dome and outdoor facilities for 10,000 seater football stadium.

The inclusion of Marvel's proposals were opposed by Merthyr Tydfil CBC Planning Department and rejected by the Planning Inspectorate into the soundness of the of Merthyr Tydfil CBC Local Plan (2016-2013).

An initial consultation with the public was unsatisfactory. Less than 20 people attended an information event in Heolgerrig Club. This was, as we were told at the time, because letters were sent to residents in Treharris/Bedlinog but not

to residents of Heolgerrig/Cyfarthfa Ward or Abercanaid/Plymouth Ward which are the closest populations/conurbations to the site.

Biodiversity

The Council has a Duty of Care to protect & enhance biodiversity across the County Borough.

Damage and fragmentation to habitats leads to a loss of biodiversity of fauna, a number of which are protected species. We are fortunate to have Great Crested Newts, Adders, Marsh Fritillary Butterflies, Badgers, Bats and Otters inhabiting the site at Rhydycar West.

The Merthyr Tydfil Local Biodiversity Action Plan identified which habitats are present at Rhydycar some years ago and seeks to preserve and enhance biodiversity interest across the County Borough.

The Welsh Government issued a consultation document dated 9th March 2023 on:-

Targeted Policy Changes to Planning Policy Wales Chapter 6 on Net Benefit for Biodiversity and Ecosystems Resilience (incorporating changes to Strengthen Policy on Sites of Special Scientific Interest, Trees and Woodlands and Green Infrastructure).

This document and its targeted policy changes is relevant to consideration of planning application P/023/0065 Land to the south-west of the A470/A4102 roundabout at Rhydycar West , Merthyr Tydfil, namely:-

- The Cwmglo & Glyndyrys Site of Special Scientific Interest (SSSI)
- The Cwmglo Site of Importance for Nature Conservation (SINC)
- Trees, Woodlands and Hedgerows
- Green Infrastructure

Page 16 Paragraph 6.4.17 SSSI

There is a presumption against development in a SSSI and this presumption should be appropriately reflected in development plans and development management decisions.

Page 17 6.4.20 Protection for Non-Statutory Designations, SINC

Non-Statutory Designations can form the core of a vital network of the related habitats.

They should be given protection in development plans and the development management process.

Page 18 6.4.24.25 Trees Woodlands

Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits.

Welsh native tree species characteristic of the local area (present at Rhydycar West) provide strong ecosystem resilience function providing resources for local wildlife particularly other native plants and species.

Where trees, woodland and hedgerows are present their retention should be identified within the planning application.

Achieving Net Benefit for Biodiversity is the underlying principle for the Targeted Policy Changes to Chapter 6 in Planning Policy (Wales) in the Consultation Document.

Strengthening the policy on Sites of Special Scientific Interest and Trees, Woodlands, Hedgerows and Green Infrastructure will positively assist in this process.

Sites that include SSSIs, SINCs, Protected Species and Habitats, especially those that are irreplaceable must be safeguarded from damaging development proposals.

This requirement applies to Cwmglo & Glyndyrys SSSI, Cwmglo Sinc and their designated Species and Habitats.

Is the development detailed in Planning Application P/23/0065 needed at Rhydycar West? There is another site at FFos-y-Fran within the settlement boundary which could accommodate all of the facilities detailed in that planning application.

Alternative Sites

The developer is required to identify alternative sites where this development could take place. Regrettably they have chosen not to do this stating "there are none"! Perhaps it was not in their commercial interest to do so.

The restoration at Ffos-y-Fran now that permission for coaling has ceased would be an ideal location for the development of a ski resort. Access to the site will be much improved with the completion of the A465 dualling at Dowlais Top and of course there is a railhead at Cwmbargoed.

The Council owns a parcel of land at Ffos-y-Fran which was loaned to Miller Argent to facilitate the Phase 3 East Merthyr Land Reclamation Scheme. The current owner of the site would now be party to that lease.

The former Tower Colliery site would also be a suitable location bearing in mind it already has some outdoor leisure facilities on site.

Why were these 2 sites not considered suitable locations for a leisure complex by Marvel?

At Ffos-y-Fran there will be a surplus of soil forming material once the existing voids are backfilled. This could be used to construct the ski slope.

Climate Change

Excavations at Rhydyar West will result in the release of coal bed methane into the atmosphere.

As this application is "outline" any mitigation is speculative. Until a comprehensive sub surface exercise is carried out the stability of the proposed development site is unknown.

The permission of The Coal Authority will be required if any excavation comes into contact with the subterranean coal seams.

The removal of flora from the site to create the development will also result in trapped/stored CO₂ being released into the atmosphere adding to greenhouse gas emissions which Welsh Government is committed to reducing.

The points of connection to the National Grid (electricity), Gas Main, Water and Sewerage Networks are still to be determined. What is the cost of these essential services and who will pay for them?

Transport

A car park requirement of up to 830 places indicates an over-dependence of access by private motor vehicle to service the built development features.

This is contrary to National Planning Policy which supports access by walking, cycling and public transport. As the proposed development site is isolated from public transport hubs, any mitigation to improve access via the Rhydycar/Town centre roundabout off the A470(T) would be ineffective.

Traffic gridlock is already experienced off the A470(T) between the access to Bike Park Wales and Cefn Coed roundabout A465. Queues already form at the nearby Cyfarthfa Retail Park/Trago Mills roundabout which have led to numerous accidents.

There will be an increase in air pollution from the exhausts of stationary vehicles affecting the Merthyr Tydfil Leisure Village, Merthyr Tydfil Police Station/Bridewell Suite, Orbit Business Centre, Ynysfach Estate and the EE employment site, drifting towards the town centre on the prevailing wind direction.

The proposal to provide a shuttle bus from the railway station to the Rhydycar site and access for walkers and cyclists via the pedestrian bridge over the A470(T) will not mitigate for the increase in vehicle traffic inherent in the proposal or an increase in air pollution.

In Conclusion

Many years ago a ski slope was built above Pentrebach. It failed because of an inability to produce snow. They tried making their own snow but the cost was more than they were making. The scars on the mountain are still visible.

Whilst it is acknowledged that the scheme was limited in its size and lack of local support, it is crucial to know how the volumes of snow required for the very long runs in the Marvel application will be manufactured and the amount of water required, its cost and source known.

There remain too many unanswered questions in the information provided by the applicant. On that basis alone, the application should be rejected.

I restate my objections to the proposals which will destroy/fragment key habitats for protected species and damage the unique features of nature

conservation, historical heritage interest and landscape importance contrary to National/Local Planning Policies.

Yours faithfully,

