

*Merthyr Mawr Community Council*  
*Gyngor Cymuned Merthyr Mawr*

Ms Nicola Gulley  
Inspector - Local Development Plan  
Bridgend County Borough Council  
Civic Office  
Angel Street  
Bridgend  
CF31 4WB

Date: 21st June 2023

E-mail: [REDACTED]

Dear Inspector,

Bridgend Local Development Plan

Merthyr Mawr Community Council has been made aware of the now closed consultation on the "Targeted policy changes to Planning Policy Wales on Net benefit for biodiversity and ecosystems resilience". We would be very grateful for assurance that this document is informing the inspection process of the LDP. It obviously contains much which is of huge relevance to the Island Farm and Craig Y Parcau sites.

We would like to draw your attention to para. 6.4.3 which talks about the need for Development plan strategies as well as developers to;

"support the maintenance and enhancement of biodiversity"

"ensure statutorily and non-statutorily designated sites are properly protected and managed and their role at the heart of resilient ecological networks safeguarded

"safeguard protected species of principle importance and existing biodiversity assets from direct, indirect or cumulative adverse impacts that affect their nature conservation interests....."

"secure enhancement of and improvements to ecosystem resilience and safeguard resilient ecological networks by improving diversity, condition, extent and connectivity.

*(Please note underlined text indicates updates to the Planning Policy Wales chapter 6)*  
Para 6.4.5 adds that "development must work alongside nature and it must provide and net benefit for biodiversity and improve, or enable the improvement of the resilience of

ecosystems.

The stepwise approach now demands the delivery of a "biodiversity benefit on site, over and above that required to mitigate or compensate for any negative impact"

Part 1b states "Proposals that include designated sites should, as a matter of principle, be excluded from site searches. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystems they provide must be protected, maintained and enhanced and safeguarded from development. It will be exceptional for development to be justifiable in such circumstances"

Part 3b of section 6.4.21 states that "Mitigation measures should be like for like in the case of priority species and in every case seek to build ecosystem resilience within the site and, where possible, the wider area. Having mitigated loss, a scheme of enhancements should be provided to ensure a net benefit for bio-diversity. These include on-site habitat creation.....green roofs, woodland expansion and wetland creation.

The consultation overview document, in the section "Why is ecosystem resilience important?" Talks of the importance that "A biodiversity uplift is secured over and above that required to mitigate or compensate for a negative impact" and that the stepwise approach and the NBB principles "must be applied at the earliest stages of any development planning, aiming to maintain and enhance as much bio-diversity as possible, and moving away from the assumption that damage can be compensated for, either on or off-site. Evidence showing how the stepwise approach has been followed together with these principles will be required."

Given the priority 1 species present on site and the long-term "indirect or cumulative adverse impacts" that a development of this size would have on them due to the effects of lighting, people and domestic cat pressure, and a street lit access road which bisects the SINC, it is hard to see how the development in its current size and form can be implemented. Given also the availability of redevelopment potential in the town centre and smaller sites available for development on the periphery of Bridgend which could be used to reach the target housing figures, it is also hard to see how the Island Farm development plan, in its current form could get past step one of the Stepwise process.

Merthyr Mawr Community Council is pleased that Welsh Government is seeking to clarify and strengthen Planning Policy Wales with regard to Biodiversity and eco system resilience and sincerely hopes that the Island Farm and Craig-Y-Parcau allocations will be assessed in the light of these draft policy changes.

Yours faithfully



Clerk to Merthyr Mawr Community Council