

ES19.2



Blaenau Gwent County Borough Council

Local Development Plan

Hearing Session 19: Cwmtillery Settlement

Boundaries

Tuesday 10 July 2012

Examination 2012

Blaenau Gwent County Borough Council Submission

Examination Statement Reference No:	ES19.2
Submission date:	15th June 2012

SESSION 19 CWMTILLERY SETTLEMENT BOUNDARIES

Introduction

This Statement has been prepared by Blaenau Gwent County Borough Council in order to help facilitate appropriate discussion at the Cwmtillery Settlement Boundaries Hearing Session. The Paper provides a response to the questions set by the Planning Inspector (Mr Vincent Maher).

Where the Council does not intend to provide any additional written evidence the Inspector's attention is directed to the relevant part of the Evidence Base, which in the view of the Council addresses the matters raised. The paper will not repeat evidence previously submitted for consideration.

The Council's detailed response to the representations received to the Cwmtillery settlement boundary are contained in the Report of Representations (**SD07b**).

Council Response to Inspector's Questions (questions in bold)

1. Are the settlement boundaries for Cwmtillery soundly based?

The Council's evidence base for the development of settlement boundaries in Cwmtillery are set out in:

- **SD30:** Candidate Site Methodology Paper
- **SD32f:** Findings of the Candidate Site Assessment Process: Appendix 5 Settlement Boundary Review (Site Ref No 22: Holly Tree, West Bank, Cwmtillery and Site Ref No 23: Cefn View Bungalows, Top Rows, Cwmtillery)

Yes. It is considered that the settlement boundary for Cwmtillery has been soundly drawn. The settlement boundary for Cwmtillery followed the process set out in **SD30** and that described in question 6 of Hearing Session 1 – Development Strategy/ Vision (**ES1.3**).

Two small sites were submitted in Cwmtillery (site references 22 and 24) to be considered for inclusion in the settlement boundary. The sites have been assessed as part of the settlement boundary review process. The assessment concluded that to include the sites would result in an illogical boundary that followed no defensible line. The surrounding area is also of rural character to the far north, west and south of the site. If a boundary was to be drawn this greenfield land would have to be included which could come under pressure for development.

It is more appropriate for these proposals to be considered against policy SB1 rather than amend the settlement boundary. Policy SB1 of the deposit Plan (**SD01**, page 79) adopts a positive approach to sensitive infilling of small gaps

within small groups of houses, or minor extensions to groups outside the settlement boundary.

AS (N) 21 - Ty Pwdr

1. Is there a need to identify any additional or alternative sites for housing and/or live-work activity? Are the alternative proposals put forward by other representors (for example AS (N) 21 – Ty Pwdr) appropriate and deliverable? Has this site been subject to sustainability appraisal compatible with that for the allocated sites in the Plan?

Is there a need to identify any additional or alternative sites for housing and/or live-work activity?

No. The Council consider that there is no need to identify any additional or alternative sites for housing and/or live-work activity.

The Inspector's attention is directed to **SD40** Housing Background Paper and **SD41** Updated Housing Background Paper which sets out the housing land requirement figures. The Inspector's attention is also directed to the Council's Examination Statement for Hearing Session 2: Housing (**ES2.5**).

The allocation of sites for housing followed a robust and methodical assessment process to ensure that every allocated site is capable of development and can contribute to the delivery of the Strategy. The Inspector's attention is directed to **SD30**: Candidate Site Methodology Background Paper which sets out the assessment process in full and **SD32a-f**: Findings of the Candidate Site Assessment Process.

The promotion of live-work activity in the countryside is not considered a major issue worthy of inclusion in the Plan as Blaenau Gwent is not a rural area (**ES9.1**). However, the consideration of live-work units in the urban area will be dealt with through development management policies.

Notwithstanding this, it is considered that criterion (e) of policy SP8 Sustainable Economic Growth will serve to support the promotion of rural enterprise which includes such development as live-work units.

Are the alternative proposals put forward by other representors (for example AS (N) 21 – Ty Pwdr) appropriate and deliverable?

No. The Council consider that the alternative proposals put forward by other representors are not appropriate and deliverable.

The site was previously assessed and rejected under the candidate site assessment process (Candidate Site D27). The results of this process are clearly set out in **SD32e**. The site was considered to be unsuitable for residential development on the grounds that the site is a SINC and of high ecological and biodiversity value; and development of this site would be

visually obtrusive in the landscape and would have a negative effect on the character and appearance of the area.

The representor has submitted an amended site boundary to that considered at the candidate site assessment stage. Therefore the representor has undertaken a sustainability appraisal, its own assessment of the site following the process in **SD30**.

The Council have reviewed the assessments undertaken and reassessed the site. It remains the Council's view that the site is unsuitable for residential development on the grounds that the site is of high biodiversity and landscape value.

The development of this site for residential development would result in the loss of the majority of acid grassland within Ty Pwdr, which justifies SINC designation in its own right but also contributes significantly to the overall area of this habitat and other habitats within the Greenmeadow SINC and thus forming an integral ecological component of the wider area. Although the proposals are to develop a smaller area of the Ty Pwdr site it is highly likely that the impacts on the habitats and species, considered to be of high value for nature conservation will be high – habitats would be lost and fragmented. Therefore this site should not be developed for housing. A full Council response to the independent ecological assessment undertaken by the representor is set out in **SD07b** (pages 465 – 468).

A study undertaken by Bronwen Thomas (**SD110**) using the recognised LANDMAP assessment criteria classifies the site as being of high value and therefore included in the Cwmtillery Special Landscape Area. There are also visual impact concerns over the wider valley area.

The site is located in the Southern Strategy Area. The deposit LDP allocates sufficient land to deliver sustainable regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would therefore not support the delivery of the LDP strategy. Attached at Appendix 1 are the results of the assessment of the sites against the Preferred Strategy and Sustainability Appraisal Objectives.

Attached at Appendix 2 is the Council's rebuttal of the examination statement (**ES19.1**) submitted to AS (N) 21 – Ty Pwdr.

Has this site been subject to sustainability appraisal compatible with that for the allocated sites in the Plan?

The Council note that the representor of AS (N) 21 - Ty Pwdr has undertaken a sustainability appraisal of the site.

However, the Council would not agree that the sustainability appraisal is compatible with that for the allocated sites in the Plan. The Council note this is a very subjective assessment but do not consider that the representors have made realistic assumptions when assessing the sites. The Council's

assessments are based on the views received from the expert assessments. The representors' assessments fail to acknowledge biodiversity and landscape issues that are clearly known constraints for these sites.

The Council has undertaken its own sustainability appraisal of the alternative sites which is comparable to that done for the allocated sites. The results of which are included as an appendix to this statement. It should be drawn to the Inspectors attention that when comparing the alternative sites, the sites performed are less sustainable than the allocated sites.

Appendix 1

Ebbw Vale Area

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed sites for LDP Deposit Plan					
B44	Willowtown School	20	57	77	22
B5, B7, B8, B46	Ebbw Vale North (Mixed Use allocation)	40	32	72	700
				Total	722
B21	Waunlwyd School	16	49	65	12
AS (N) 04	Land at Big Lane – Site 6	18	42	60	
B20	Highlands Road	14	39	53	60
AS (N) 02	Land at Big Lane – Site 4	14	39	53	
AS (N) 03	Land at Bryn Farm – Site 5	14	33	47	
AS (N) 05	Land off Parkhill Crescent	16	31	47	
B16	Lakeside Car Park, Festival Park	11	29	40	14
B19	Vacant site adj Respite Care Centre	12	27	39	10
B24	Land adj to the Castle, Rassau	10	25	35	12
B35 AS (N) 01	Nant-y-Croft, Rassau	10	21	31	51
Sites taken out at Stage 2 assessment					
B1	Adjacent to Wrekin Site, Aberbeeg				
B9	Land at Bryn y Gwynt				
B10	Drysiog Farm				
B11	Land off Parkhill Crescent				
B12	Land off Pant-y-Fforest				
B15	Land surrounding Wetlands Building, Festival Park				
B18	Cwm Slopes, Festival Park				
B23	Land at Park View, Beaufort				
B24	Land adj to the Castle, Rassau				
B41	Land to the rear of Glyndwr Road, Rassau				

This table identifies the best performing housing sites in the Ebbw Vale Area.

The site in yellow performed well against the assessment but has issues with it which means that it should not be taken forward.

B21 - Waunlwyd School: On reflection this should be classed as a small site as realistically it can only accommodate 6-8 houses due to the shape of the site and the need to retain the boundary walls.

Tredegar

Ref No.	Site Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed Sites for LDP Deposit Plan					
A21	Corporation Yard	20	57	77	12
A45	Jesmondene Stadium	20	53	73	179
A25	Cartref Aneurin Bevan	20	51	71	13
A26	Greenacres	20	51	71	18
A43	Business Resource Centre	18	51	69	42
A19	Waundeg Housing Site	16	53	69	30
				Total	294
A22	Land at Sirhowy	16	49	65	30
A4	Former Gas Holder Station	16	49	65	17
A23	Land adjacent to Bryn Rhosyn	16	49	65	24
A11	Tredegar Ambulance Station	16	47	63	17
A28	Land at rear of Cripps Avenue	14	45	59	30
A12	North Side of Merthyr Rd	14	41	55	21
A13	Land to the North of Bryn Rhosyn	14	39	53	17
A46	Land South of Bevans Avenue	16	33	49	69
A36	Adj Chartist Way	13	35	48	101
A47	Park Hill	13	32	45	378
Sites taken out at stage 2 assessment					
A5	Northern boundary to Bryn Pica				
A6	Land opposite Hunts Lodge				
A7	Rear of Factories and Pochin House				
A10	The Rhyd, Peacehaven				
A16	Tyr Morgan Hywel Farm, Nantybwh				
A24	Land at Golwg-y-Mynydd				
A27	Mile End Field, Georgetown				
A41	Land adjacent to Dukestown Cemetery				
A44	Fairview Field, Nantybwh				

The table above identifies the best performing housing sites in the Tredegar Area. The sites in yellow performed well against the assessment but have issues which mean they are not being taken forward. The sites in orange have been taken forward into the LDP but may not be allocated at the higher density figure or may now be listed as a housing commitment rather than an allocation.

A21 – Corporation Yard: This site now has planning permission and so is allocated as a housing commitment in the LDP.

A45 – Jesmondene Stadium: Part of the site, the brownfield area of land has been allocated for housing only.

A19 – Waundeg Housing Site: This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

A22 – Land at Sirhowy: There are instability problems and mine shafts that make the site unviable.

A4 – Former Gas Holder Station: Although it was agreed that this was a good site, it does have contamination issues and has not come forward in a good economic climate it is considered appropriate for the site to be not taken forward.

A23 – Land adjacent to Bryn Rhosyn: There are ground instability problems with this site that makes the site unviable.

A11 – Tredegar Ambulance Station: There is uncertainty as to whether the ambulance service will be closing this building – at present cannot confirm either way.

A28 – Land at Cripps Avenue: This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

A12 – North side of Merthyr Road: outline planning permission pending

A13 – Land to the North of Bryn Rhosyn: There are ground instability problems with this site

A46 - Land South of Bevans Avenue: It is difficult to envisage how access can be achieved at this site. There are 2 possible means of access to the site – Ashvale Football Club and the end of the cul-de-sac of Bevan Avenue. Ashvale Football Club – applicant has not indicated who owns or controls the land to gain access to the site.

The end of the cul-de-sac of Bevan Avenue – given the existing cul de sac length of Bevans Avenue is already in excess of the design maximum permitted vehicular access would not be permitted to serve as access to any development proposal.

A36 - Adj Chartist Way: The contribution figure is likely to be lower due to constraints.

A47 –Park Hill: The site has planning permission

Upper Ebbw Fach Area

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed sites for LDP Deposit Plan					
C6	Garnfach School (based on mixed use allocation)	23	57	80	12
C22 & C32	NMC Factory Blaina Road (Mixed use allocation)	29	49	78	60
C25	Brynmawr Infants School & Old Griffin yard	20	57	77	37
C8	Hafod Dawel Site	20	57	54	44
C23	Crawshay House	20	53	73	25
C26	Land at Pant View, Coed Cae	20	53	73	26
C39	Land to the east of Blaina Road	19	53	72	21
C12	Land to the North of Winchestown	20	49	69	15
			Total		240
C14	Land West of Recreation Ground	20	45	65	16
C24	Land rear of Waunheulog	16	43	59	42
C15 AS (N) 20	Land North of Winches Row	14	41	55	110
AS (N) 18	Ffoesmaen Road	14	41	55	
AS (N) 14	Land at Beaufort Hill – Site 2	14	39	53	
AS (N) 16	Land east of Pant View Houses, Coed Cae	14	35	49	
AS (N) 13	Land at Brynmawr – Site 1	14	33	47	
AS (N) 15	Land at Bryn Farm – Site 3	14	29	43	
C3	Land to the south of Rising Sun Industrial Estate	10	33	43	81
C13 AS (N) 19	Land to the South-West of Waun Ebbw Road	14	35	49	50
C5 AS (N) 17	Southlands, Blaina	10	25	35	52

Sites taken out at stage 2 assessment	
C1	Land at Upper Coed Cae, Nantyglo
C2	Land east of Pant View Houses, Coed Cae
C4	Croesyceiliog Farm
C9	Land adjacent to Gwaelodd-y-Gelli
C10	Former Bus Depot, Land west of A467, Blaina
C11	Ffoesmaen Road, Upper Coed Cae
C31	Land adjacent to Station Terrace, Nantyglo
C36	BEWA (UK) Ltd, Noble Square Industrial Estate
C37	Land at Twyn Blaenant, Blaenavon Road, Brynmawr
C38	Brynewelon, Nantyglo

The table above identifies the best performing housing sites in the Upper Ebbw Fach Area. The site in yellow performed well against the assessment but has issues which mean it is not being taken forward.

C26 – Land at Pant View, Coed Cae: This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

Lower Ebbw Fach Area

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed Sites for Deposit LDP					
D13a	Six Bells Colliery Site	23	49	72	60
D23	Warm Turn	16	49	65	32
D25	Roseheyworth Comprehensive	16	45	61	33
D21	Former Mount Pleasant Court, Brynithel	16	45	61	18
D30	Quarry Adj to Cwm Farm Road	16	45	61	22
			Total		165
D20	Hillcrest View	16	41	57	22
AS (N) 21	Ty Pwdr	8	39	47	
Sites taken out at stage 2 assessment					
D1	Ty Dan-y-Wal Road, West Bank, Cwmtillery				
D2	Former NCB Housing, Hafod-y-Coed				
D6	Land to the west of Lewis Street, Swffryd				
D7	South of Lewis Street, Swffryd				
D8	Argoed Farm, Aberbeeg				
D9	Quarry at the Gilfach Wen Farm, Six Bells				
D16	Brynhydrid Junior School				
D17	Former Tyr Graig Junior Mixed & Infants School				
D24	Rear of Farm Road				
D26	Greenmeadow Farm (UDP Allocation H2 (10))				
D27	Ty Pwdr / Greenmeadow Farm (UDP Allocation H2 (35))				
D29	Land to the east of Bournville Road, Blaina				

The table above identifies the best performing housing sites in Lower Ebbw Fach. The site highlighted in orange has been taken forward into the LDP because planning permission has been granted.

D20 – Hillcrest View: Planning permission has been granted.

Appendix 2

Rebuttal of Alternative Site AS (N) 21

Summary of Representer's Case	Council Response
AS (N) 21	
<p>Representer: Ian Roberts Consultancy (80)</p> <ul style="list-style-type: none"> • The site was not assessed as a stand alone candidate site contrary to Council assurances • Planning permission was granted in 1993 • Part of the Authority's concerns related to archaeological features • Post refusal of planning permission for 73 dwellings • The Authority's approach to SINC designation is flawed 	<ul style="list-style-type: none"> • The Council disagree. The site was previously assessed as part of a larger tract of land as an undeveloped Unitary Development Plan allocation. As a result of the site being an alternative site and the submission of further information the site has been reassessed. This is clearly set out in SD07b (pages 462 - 469) and Appendix 1 of ES4.8. • There is no extant planning consent at this site as planning permission was recently refused at the site in April 2010 for residential development on the grounds of the proposal would effect the character and appearance of the area, recorded archaeological sites; and ecology and biodiversity. • This is incorrect. The Council does not insist that the archaeological features relate to the Ty Pwdr site, in fact the Council does not cite archaeological features as a reason for not taking forward this land. Recorded archaeological features was a reason why the Inspector at the Planning Inquiry dismissed the planning application in 2010. The Inspector's attention is directed to SD07b (pages 462 - 469), SD32e (candidate site ref D26 and D27) and the representer's deposit plan representation which includes a copy of the Inspector's report (SD08 – Rep No 80). • The Council received no documentation during the 'call for candidate sites' from the landowner of Ty Pwdr asking for the site to be considered for inclusion in the Plan. The Council instead included Ty Pwdr and Greenmeadow Farm as undeveloped Unitary Development Plan allocations. • All SINC's were assessed and identified in accordance with SD110. A copy of the authority's individual SINC site maps and corresponding site

<ul style="list-style-type: none"> • CCW did not object to the planning application for 73 dwellings • Designation of a Special Landscape Area • There is no evidence of contamination • No assessment has been made with regard to live/work units • The allocation of land to deliver sustainable regeneration is questioned 	<p>descriptions and analysis are attached at Appendix 3. The Council's Ecologist reviewed all information submitted by the representor and remained of the view that to develop the site for housing will result in the loss of the majority of acid grassland within Ty Pwdr, which justifies SINC designation in its own right but also contributes significantly to the overall area of this habitat and other habitats within the Greenmeadow SINC and thus forming an integral ecological component of the wider area. Further information is set out SD07b (pages 485 - 468).</p> <ul style="list-style-type: none"> • CCW's comments were made without sufficient material information relating to the ecological importance of the site, which are now required by legislation and planning policy. • A Study undertaken by Bronwen Thomas (SD110) using the recognised LANDMAP assessment criteria classifies the site as being of high value and therefore included in the Cwmtillery Special Landscape Area. The evaluation grades that have been designated in Landscape Value on Land Map are: Earth Science – Moderate; Biodiversity – High; Visual & Sensory – High; History & Archaeology – High; and Culture – High. • The Council have stated that there is potential for contaminated land as identified in the Environmental Health proforma completed as part of the candidate site process (SD32e). This was not listed as a reason for not allocating the site. • The Council's clearly justifies its response to live/work units in SD07b (pages 140-141) and ES19.2. • The allocation of land in the LDP has followed a robust and methodical process following the candidate site methodology set out in SD30. The ecologist has not confused the SINC at Greenmeadow Farm with Ty Pwdr - the Council clearly justifies above why the land at Ty Pwdr is designated as a SINC. SD07b clearly reflects the Council's position in terms of live work
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	units and the planning history of the site.
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Appendix 3

Blaenau Gwent Wildlife Site/SINC Notification Form

SITE SUMMARY

SITE NAME: Green Meadow Farm

GRID REF: SO222050

SURVEYOR(S):

J.Winder

SIZE (approx.): 42.26ha

DATE OF SURVEY: September 1998

LOCAL AUTHORITY AREA:

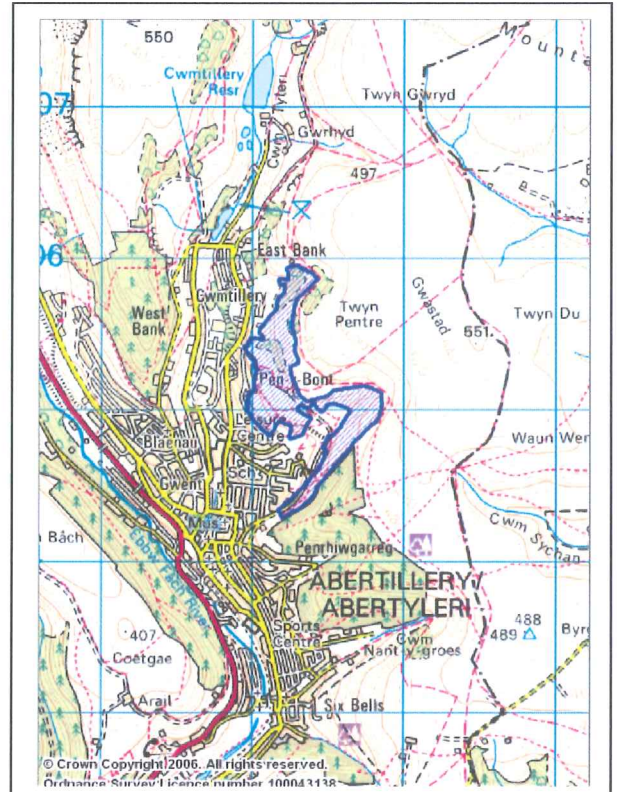
Blaenau Gwent

WARD: Abertillery

MAIN HABITAT TYPES PRESENT:

Habitat types	NVC type	Area (ha)
Acid Grassland	U4	
Wet Woodland	W7b	
Beech woodland	W15b	
Oak woodland	W17b	
Mire	M6c	
Heathland	H9/H12c	
Rush Pasture	M23b	
Scrub	W21/W24	
Spoil	-	
Quarry	-	

SKETCH MAP OF SITES LOCATION:



FULL DESCRIPTION OF SITE (including topography, adjacent land use, access and boundaries etc.):

Green Meadow Farm is located on the hillside to the east of Cwmtillery. The aspect is mainly to the west with local aspects to the north and south. The buildings of the farm are derelict with one barn remaining. Previously the site was an area of coal mining with colliery tips. More recently the tips have been reprofiled under a land reclamation scheme, seeded with a grassland mix and some areas planted with trees.

A variety of habitats can be found on the site which include acid grassland, woodland, heathland and mire. The acid grassland is variable in species richness with some areas having *Campanula rotundifolia* (harebell), *Polygala vulgaris* (common milkwort) and *Leontodon autumnalis* (autumn hawkbit). In the areas of heathland (Areas 22, 25, 27 and 28) *Empetrium nigrum* (crowberry), *Calluna vulgaris* (ling) and *Vaccinium myrtillus* (bilberry) can be found. In the mire communities *Ranunculus flammula* (lesser spearwort), *Carex spp.* (sedges) and *Galium palustre* (Marsh bedstraw) are present. The woodlands include oak (*Quercus sp.*), beech (*Fagus sylvatica*) and alder (*Alnus glutinosa*) with scrub and heathland grading into them. Small quarries can also be found.

As a whole the site supports a rich mosaic of habitats of great value for wildlife.

Official Use Only: Site selected as a Wildlife Site/SINC? YES NO Date: 15th January 2008

DETAILED SITE INFORMATION

SITE OWNERSHIP: Including names of any tenants/graziers

	Name	Address	Telephone number(s)
1	Estates Blaenau Gwent County Borough Council	BGCBC Civic Centre Ebbw Vale	01495 355032
2	Blue Area (on ownership map) is leased to Vowles	C/O BGCBC Civic Centre Ebbw Vale	
3	Idris Watkins	35 Gladstone Street Abertillery	
4	James Roche	12 Johns Crescent, Rogerstone	
5			

Are there any public rights of way on the site?

Yes No

Does the site already have any designations?

Yes No

If yes please state designation/s:.....

What is the current management at the site?

Some areas are grazed

Are there any LBAP Priority Habitats or Species present?

Habitats	Species
Upland Oak Woodland	
Wet Woodland	
Purple Moor-grass and Rush Pasture	
Dwarf Shrub Heath	

Are there any Section 74 species present?

Unknown

Are there any threats to the site?

Scrub encroachment
Part of the site has been allocated for housing H2(10) (proposed) and H2(35) (committed). (Source: *Blaenau Gwent County Borough Council Unitary Development Plan 1996 – 2011 – Adopted July 2006*)

Are there any invasive species present?

Bracken (*Pteridium aquilinum*)

Please state the section(s) of the Wildlife Site Guidelines that this site qualifies under:

Mosaic Habitats (H20)

Qualifying Habitat types	Number of indicator species present
Acid grassland	N/A
Woodland	
Mire	
Heathland	
Rush pasture	

Sketch map of site (including northpoint, scale and areas of the site of particular note):

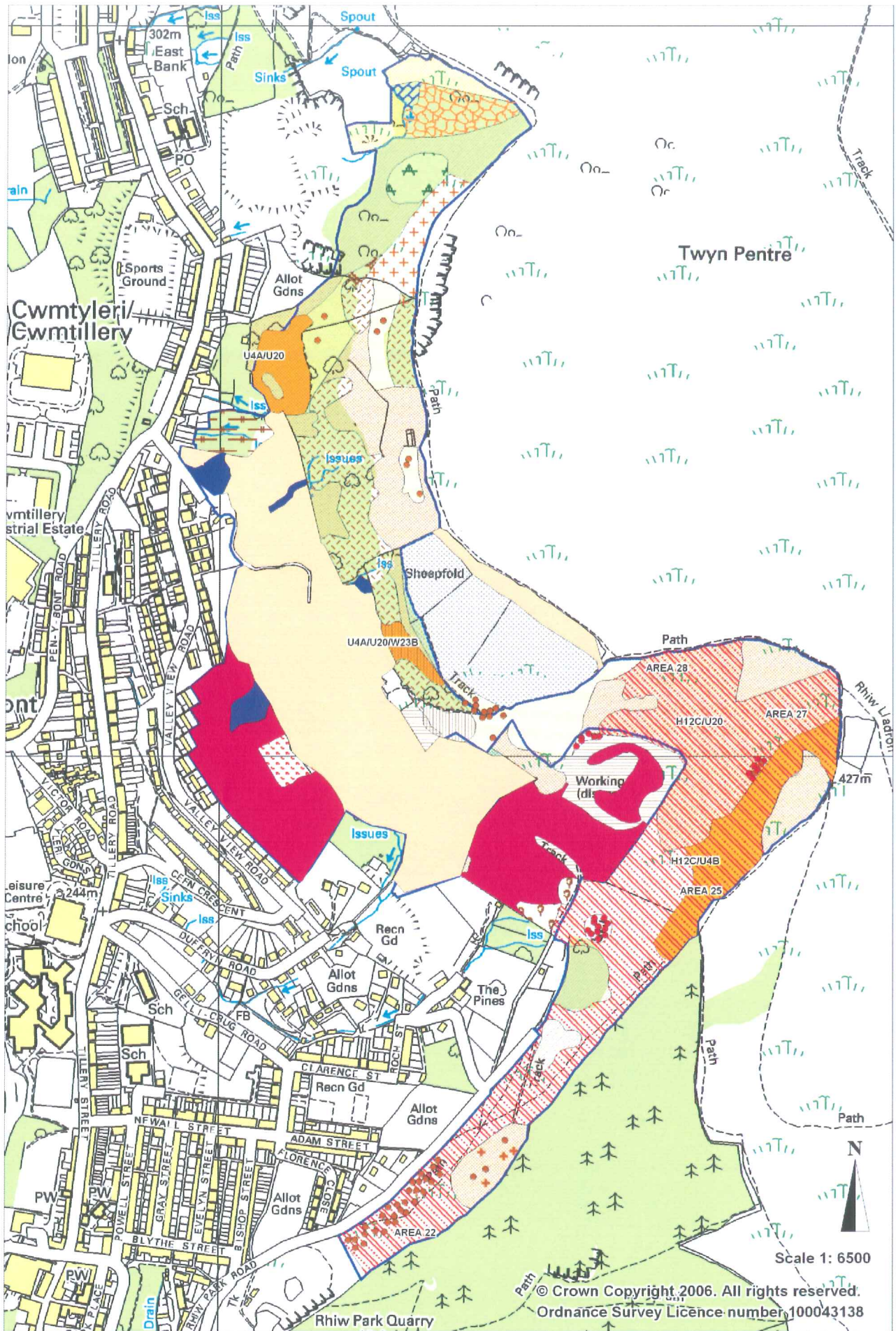
Please see overleaf.

Please list all additional survey information both past and present that relates to this site:
Winder, J. (1998) Green Meadow Farm Biodiversity Survey



























OFFICE USE ONLY

Site no.:

Please note: The data on this form may be held in accordance with the Blaenau Gwent County Borough Councils registration under the Data Protection Act 1996



Please refer to habitat map in *J. Winder (1998) Green Meadow Farm Biodiversity Survey* for full numbering of areas.

	SINC Boundary
	Rocky Outcrops
	Scattered trees
	Scattered scrub
	U20 Pteridium aquilinum-Galium saxatile community
	Other Grassland
	W21 Craetagus monogyna-Hedera helix scrub
	W24 Rubus fruticosus-Holcus lanatus underscrub
	U4a Festuca ovina-Agrostis capillaris-Galium saxatile grassland, typical sub-community
	M6c Carex echinata-Spahgnum recurvum/auriculatum mire, Juncus effusus sub-community
	MG7 Lolium perenne ley
	U4b Festuca ovina-Galium saxatile grassland, Holcus lanatus -Trifolium repens sub-community
	W15b Fagus sylvatica-Deschampsia flexuosa woodland, Deschampsia flexuosa sub-community
	U4 Festuca ovina-Galium saxatile grassland
	W11b Quercus petraea-Betula pubescens-Oxalis acetosella woodland, Blechnum spicant sub-community
	M23 Juncus effusus/acutiflorus-Galium palustre rush-pasture
	U4 Festuca ovina-Galium saxatile grassland/ U20 Pteridium aquilinum-Galium saxatile community mosaic
	W15 Fagus sylvatica-Deschampsia flexuosa woodland
	W17a Quercus petraea-Betula pubescens-Dicranum majus woodland, Isoetecium myosuroides-Diplophyllum albicans sub-community
	W15a Fagus sylvatica-Deschampsia flexuosa woodland, Fagus sylvatica sub-community
	M23b Juncus effusus/acutiflorus-Galium palustre rush-pasture, Juncus effusus sub-community
	H9 Calluna vulgaris - Deschampsia flexuosa heath
	W23b Ulex europeaus-Rubus fruitcosus scrub, Rumex acetosella sub-community
	W7b Alnus glutinosa-Fraxinus excelsior-Lysimachia nemorum woodland, Carex remota-Cirsium palustre sub-community
	H12c Calluna vulgaris-Vaccinium myrtillus heath, Galium saxatile-Festuca ovina sub-community
	U4e Festuca ovina-Galium saxatile grassland, Vaccinium myrtillus-Deschampsia flexuosa sub-community