

Usk Valley Conservation Group

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Gilestone Farm and its sustainable future use

Dear Minister

We are writing to you to urge you to rethink your plans for leasing Gilestone Farm to a commercial festival company who have chosen to have no meaningful contact with the local population and continue to fail to engage. The farm is in a National Park, where our already healthy tourist population come for peaceful enjoyment of the landscape and wildlife, is rich agriculturally, seriously floods regularly, and is in a valley with a community population of 700, 350 of whom live within 600m of the farm. Access into Talybont is by two small roads and across one of the only three bridges between Brecon and Crickhowell. The valley supports a rich and diverse ecosystem with many protected species, including curlew and the remaining European stronghold of the threatened lesser horseshoe bat, all of which will be negatively impacted by increased activity on the farm through traffic, light and noise pollution and run off into the SSSI protected River Usk.

The Usk Valley Conservation Group was formed following a public meeting held in Talybont-on-Usk in May this year, following the announcement in the National media of the purchase of the farm by the Welsh Government.

We have set out below our principal concerns and have attached a more detailed briefing pack providing further information.

1. Gilestone farm and the landscape

- a. The farm is positioned on the rich flood plain fields in the River Usk valley, which divides the Brecon Beacons from the Black Mountains, and is a part of the Brecon Beacons National Park. The 'Brecon Beacons National Park Landscape Character Assessment' stated that natural heritage features would be sensitive to a loss of ecological connectivity and that recreation provision and access could impact on the character of the area. (Information Pack section 1a)
- b. Flooding. Gilestone Farm is situated on a floodplain and most of it is identified by Natural Resources Wales (NRW) as being at medium or high flood risk. Realistically, the only significant field on the farm that is level and not built on is the glamping site, less than 1 hectare in size. From observation we know of certain dates when the farm was subject to flooding. By correlating these with data on river flow rates we estimate that the farm experienced serious flooding in at least five of the 21 years from January 2000 covering about 85% of the farm. Lesser degrees of flooding occur very much more frequently and the impacts of climate change should be expected to increase the frequency and severity of flooding in coming years. This approach to estimating the frequency of flooding is not scientifically rigorous - although the results do seem to be in line with local experience. However, given that flooding should be a

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key determinant in assessing the suitability of the farm for festivals and potentially other developments, a better understanding of the actual frequency of flooding is urgently needed. This requires hydrological modelling (Information Pack 1b).

- c. Traffic problems around access. It should be noted that the one 'hard-surface' access lane to the farm is single-width for most of its length and with limited visibility and passing at its junction with the public highway at Station Road, Talybont. The same junction is also used for access to an existing caravan site on the adjacent Talybont Farm, and at certain times there are already difficulties for caravans, caravan site visitors, agricultural vehicles, and vehicles of visitors using the Gilestone glamping facilities. There are other access points to Gilestone Farm which are unsurfaced and often deep in mud. Access for the number of vehicles to set-up, maintain and remove 'festival' infrastructure plus vehicles to be used by customers of the festival would be impossible to imagine unless substantial and costly ground works/engineering were carried out. Access to the farm and village is by two small roads (one single track in places) and across one of the only three bridges between Brecon and Crickhowell.

2. Gilestone Farm, Background and history

- a. Gilestone is a productive agricultural holding of 240 acres. A 10th February 2020 local estate agent's marketing prospectus stated "*Gilestone Farm is a high-quality lowland farm, situated alongside the River Uskin the highly fertile flood plain of the river. It combines a fine period Grade II listed farmhouse.....together with some of the finest arable and pasture land in the area. The land has great potential for high value cash crop growing, including potatoes, as well as arable crops and high-quality grassland suitable for fattening cattle.*" In the 1960s, under the ownership of the Jones family, the farm won awards for the quality of its grazing turf
- b. It attracted notoriety when between 2005 and 2010 (approx.) it was the location of a seriously faulted planning permission for a large caravan site. The activities on the farm generated noise, visual intrusion into the National Park landscape, litter and significant disturbance to the village. On many evenings there were up to 600 people with music and drinking and such events generated unacceptable levels of traffic, visitor pressure, noise etc. The High Court subsequently quashed the planning consent. The then owners sold the farm to Charles Weston who has since returned the farm to full agriculture and diversified some use of the buildings and land to small business units, a horticultural enterprise, some holiday accommodation and community orientated projects including a community planted and managed apple orchard, a community planted 4,000 sapling wooded areas for enhancing wildlife, and a permissive foot path. We understand that Mr Weston has a short lease to October 2022 to enable him to harvest this year's crops.

3. Wildlife including designations

The potential ecological impacts are many and varied. In particular, they concern lesser horseshoe bats, protected mammals such as otter, the opportunities to play a role in the Wales curlew recovery project, rare plants, breeding rare bird populations and the site's location within statutory protected sites (SSSI and SAC).

- a. The river River Usk is a designated Special Area of Conservation. The farm lies immediately adjacent to the Upper Usk SSSI and includes the riparian habitat which forms its north site boundary. (Information Pack section 3a)

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- b. The farm is a vital foraging area for the highly protected lesser horseshoe bat. The Vincent Wildlife Trust manages the five bat roosts and nursery sites in this bat hotspot. These reserves represent 5-10% of the total Welsh population and the valley is a European stronghold for this threatened species. Surveys carried out by the Trust highlight the roosts, commuting area and their foraging areas. The survey demonstrated that the farmland is an essential foraging area and is of upmost importance to their survival. This bat species in particular will avoid light and noise. Any use of the farmland which leads to an increase in light and noise intrusion will negatively impact the bat population. A Planning report bat survey from 2011 provides further documentary evidence of bats roosting on the farm itself (Information Pack section 3b)
- c. Other Mammals. The upper Usk supports a strong population of otters. This species is threatened by habitat destruction, disturbance and pollution throughout its European range and is specially protected. River pollution with plastics, sewage and other phosphate/nitrate rich effluents will seriously damage the river's ecosystem and threaten the otter population downstream.
- d. The upper Usk supports a wide range of breeding bird species that are associated with riparian habitats, including common sandpiper, grey wagtail, dipper, goosander, merganser, and little grebe, and a number of species which are scarce in this part of mid-Wales, such as yellow wagtail and little ringed-plover. Kingfisher and sand martin nest in earth cliffs and banks produced by the actively eroding river throughout the whole length of the Usk, but particularly in this area of the Usk valley.
- e. In Winter 2021, the area was declared by Gylfinir Cymru ('Curlew Wales') as part of the southern most Important Curlew Area in Wales to aid nationwide recovery of this bird from extinction in the UK. The land is considered suitable for curlew recovery action with a small number of sites still in use in the immediate area. An area to the western end of the farm had been identified as a potential nesting site by local 'Curlew Wales' staff but that potential project was ended with the purchase of the farm. (Information Pack section 3c)
- f. The farm and adjacent land are host to 226 species recorded on the Biodiversity Information Service database as either of conservation priority, conservation concern, or as locally important. These include at least 16 plants on the Brecknock Rare Plant Register with a further number on adjacent habitats, and on the farm itself, 16 species considered to be too sensitive to be in the public domain. (Information Pack section 3d).

4. Sporting Rights

When Gilestone Farm was sold in 1936, the then owner reserved the sporting rights over the whole property, together with the fishing rights on the River Usk and its tributaries where they adjoin Gilestone Farm. There are also various rights of access for vehicles and on foot over the drive, and farm tracks and certain routes down to the river. The rights can and have been, exercised throughout the year, and 24 hours per day, as needed. We are aware that the vendor, Charles Weston, was aware of these rights, as they were specifically mentioned in McCarthy's Estate Agents brochure in 2020, as being specifically excluded. It is understood that the sporting rights owner's solicitors have written to you about this matter.

5. Landscape and Community Impact

- a. Dark Skies. The accreditation for this area was awarded by the International Dark-Sky Association. International Dark Sky Reserves are areas recognised as possessing an exceptional or distinguished quality of starry nights and nocturnal environment. The National Park has gone to great lengths in replacing lighting that used to make it difficult to see the night sky and continues to work toward making 100 percent of lighting within the reserve's core zone dark sky friendly. This matter is a frequent consideration in planning applications regarding outdoor lighting in commercial and private dwellings.
- b. Talybont-on-Usk Community. This is a small rural community with a valley-wide population of about 700. It is already a 'honeypot' destination for visitors and tourists and has a thriving cycle business servicing the huge growth in mountain and road cycling locally, following the designation of the village by the Park Authority as a 'cycle hub'. There is no doubt that the popularity of the village contributes to the financial success of the village shop and post office which also provides a café. Such is the growing popularity of the village that the village hall committee have had to impose a limit of 500 persons for the increasing number of walking/cycling/running events organised from the hall. The National Park Authority Local Development Plan states that an environmental capacity approach to the future sustainable development of the Park will be used. This is defined by the NPA as the "ability of a place to accept development demands placed upon it without irreversible loss or damage to the environment, natural beauty, infrastructure or community resources". Further, protection of the National Park is a shared responsibility between the Park and other bodies including the Welsh Government. (Information pack section 4 a & b)

Information gathered from residents and local business suggests it is generally considered that Talybont has now reached its 'carrying capacity'. There is minimal benefit in adding extra visitors when the village and its services are already operating at capacity. Festival type events in the summer are at the wrong time of the year: the boost is needed during the winter period. We are firmly in favour of sustainable tourism and we support the community's partnership with the sustainable tourism officer of the Park Authority.

- c. In 2010 a traffic study of the village demonstrated the UK-wide appeal of existing events in the village. There are concerns within the community that further visitor pressure will overwhelm both the community and its services. (Information pack section 4c)

- 6. Process and consultation.** As was recognised by Andrew Slade, Director General – Economy, Treasury and Constitution Group, in the recent meeting of the Public Accounts and Public Administration Committee we feel that there has been a serious failure of engagement and consultation by the Welsh Government in this matter, which has such major implications for the community, the environment and landscape.

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Timeline of process and consultation to date

- a. First Report in press 13th May <https://www.bbc.co.uk/news/uk-wales-61424705>
- b. Confidential meeting between Fiona Stewart of Green Man with Community Council and County Councillor 15th May, requested by the Community Council Clerk. No members of the public were present.
- c. Notes of 15th May ratified at the Community Council Meeting 16th May

There has been no communication from the Welsh Government to date.

7. Conclusion

- a. We believe that it would be procedurally unfair and irrational to fail to take account of the features listed above and in the attached Information Pack. Whilst we may welcome Green Man using the farm as a 'permanent base' we are totally opposed to the use of the farm for large public gatherings/festivals for the reasons cited above. We expect and trust that these features of Gilestone Farm will cause you to frame and control the uses of the farm including the size, scale, and location of any development or public gatherings/festival connected activity to ensure the environmental, ecological and social natures of the valley are respected and nurtured by the new uses of the farm.
- b. We also wish to suggest to you that your purchase of the farm offers other potential opportunities which could retain the agricultural purpose of the farm but additionally provide opportunities through education, environment and sustainability and keep Green Man in Wales. By way of example:
 - i. The Fathom Trust <https://fathomtrust.com/>
 - ii. The Black Mountains College <https://blackmountainscollege.uk/>

We would very much welcome the opportunity to meet with you, should your diary allow, to discuss our ongoing concerns regarding the proposed future use of the Gilestone Farm site.

Yours sincerely,



Peter Seaman Co Chair



Phil Darbyshire Co Chair

Cc: Haydn Fitchett and Gerwyn Evans, Welsh Government