

Objection to Proposed Allocation – Replacement Local Development Plan

Maxine Levett
[REDACTED]

Formal Objection to Proposed Allocation – Clive Road Field, St Athan

I am writing to submit a formal objection to the proposed allocation of Clive Road Field within the Replacement Local Development Plan. I oppose the allocation on several material planning grounds, including loss of public open space, ecological constraints, archaeological sensitivity, community wellbeing impacts, and the site's longstanding use as a public recreation area.

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1. Community Use and Greenfield Protection

No Adverse Effect on Locally Designated Sites:

Policy MG7 – Provision of Open Space

The adopted LDP emphasises the need to provide and protect open space as part of community infrastructure. It identifies open space as essential to supporting residential areas and future growth. This supports the argument that Clive Road Field—already functioning as community open space—should be protected rather than allocated for development.

Clive Road Field is a well-used greenfield community space dating back to 1945, supporting daily recreation, walking, play, and social use. LDP and RLDP policy priorities emphasise avoiding unnecessary greenfield development. Retaining the field aligns with adopted policies promoting wellbeing and sustainable placemaking.

The land is used by locals daily for a variety of leisure activities. It has been marked as a community space since 1945. People openly walk the field throughout the day without any secrecy. Landowner permission has not been necessary and so people have accessed the field without any discretion.

St Athan ALREADY has an open-space shortfall

St Athan is recognised as a settlement where publicly accessible, safe, usable green space is already limited. Unlike larger towns such as Barry or Penarth, St Athan relies almost entirely on:

- neighbourhood informal open spaces
- play areas
- fields historically used by the community (such as Clive Road Field)

Clive Road Field functions as informal but essential open space, used daily for:

- dog walking
- children's play

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- Child development
- physical activity
- community interaction
- biodiversity appreciation
- safe pedestrian linkage between parts of the settlement

It is exactly the type of land the Background Paper 3 aims to protect because it meets multiple forms of open space need in an area where formal provision is limited.

Although a golf course lies adjacent to the site, it cannot be considered public open space under the Vale of Glamorgan's Open Space Assessment (BP3) or Policy MG7. The golf course is a specialist, fee-based private sporting facility intended exclusively for golfers.

2. Landscape Character & MG17 Policy

The site forms part of the Upper & Lower Thaw Valley SLA. Policy MG17 requires development to avoid harming the area's rural openness, hedgerow pattern, and landscape character. Building on this land would erode key components of the SLA's established visual and environmental qualities.

SLA MG17 Requires Protection of Landscape Character

Policy MG17 clearly states that development within designated Special Landscape Areas must not cause unacceptable harm to the important landscape character of the area.

The Upper & Lower Thaw Valley SLA is designated due to its distinctive valley landform, rural tranquillity, historic landscape pattern, and scenic qualities derived from LANDMAP evaluations.

Any development that alters these core characteristics inherently conflicts with MG17.

2. The Site's Contribution to SLA Character Is Greater Than Suggested

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While the site has had local recreational use, its open grassland, hedgerow boundaries, and relationship to surrounding rural land form part of the wider Thaw Valley landscape mosaic.

LANDMAP-based SLA assessments consider not just remote upland or scenic vantage points but all contributing landscape components, including low-lying fields, hedgerows, and settlement edges that create the valley's visual unity.

St Athan is *not* in the South East Wales Growth Area

The adopted Vale of Glamorgan LDP identifies Barry as the main strategic growth location in the county, emphasising regeneration and its role in the wider city-region. St Athan is not included within this designated growth area and instead sits outside it in the rural Vale.

Implication:

Clive Road Field should not be treated as a strategic growth location. Placing substantial new development here contradicts the LDP's spatial strategy because growth is meant to be concentrated elsewhere (e.g., Barry), *not in rural settlements like St Athan*.

As a rural settlement, St Athan must follow Rural Vale development policies.

The LDP makes it clear that development in rural areas must be carefully managed to protect the countryside and the character of rural communities.

Key requirements include:

- Development must have no unacceptable impact on the countryside.
- Development should support rural communities, not overburden them.
- Rural character and landscape must be protected, not urbanised.
- Proposals must avoid the loss of important open space.

Clive Road Field and Church Farm are valued green spaces within a rural settlement. Developing it would directly conflict with the requirement to protect rural character and avoid loss of community open space.

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Policy MD1 – Location of New Development

Policy MD1 is the principal policy governing rural development and requires that any new development:

- Must not harm the countryside or rural amenity.
- Must demonstrate sustainable location and infrastructure capacity.
- Should not result in the redevelopment of important open space

Clive Road Field performs the function of an open green area within the village and East camp. Its loss would undermine MD1's explicit requirement to avoid redevelopment of important open spaces.

4. The LDP emphasises protecting open space to support community wellbeing

The LDP highlights the need to maintain the services, facilities, and open spaces that support sustainable and healthy communities. Even at the strategy level, the council stresses that high-quality open space is needed to support growth.

Removing Clive Road Field would reduce local amenity, recreational value, visual character, and community wellbeing — contrary to the LDP's stated commitment.

Clive Road Field should not be developed because St Athan lies outside the South East Wales Growth Area and must therefore follow the rural Vale policies set out in the LDP. These policies (including MD1) require the protection of the countryside, rural character, and important open spaces. Developing this field would contradict the council's spatial strategy, harm rural character, reduce essential green space, and violate the policy principles governing development in rural settlements.

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3. Biodiversity and Ecological Evidence

Objective 5 – Protecting and Enhancing the Natural Environment

Clive Road Field supports a diverse mix of plants, insects, birds, reptiles, and mammals. The SPG on Biodiversity and TAN 5 require protection of habitats and wildlife corridors. Development would result in habitat loss and ecological disruption.

The RLDP sets out a core objective to protect ecological networks, biodiversity, and natural green infrastructure. Preventing habitat fragmentation—such as the wildlife corridors around Clive Road Field—directly aligns with this objective.

The proposed allocation of Clive Road Field would not deliver any meaningful environmental protection benefits, and more importantly, the development itself would pose no justification for removing or degrading existing locally important spaces. Clive Road Field currently functions as an informal but well-established area of Public Open Space, supporting connectivity to the wider network of habitats in St Athan.

Although the field is not formally designated as a statutory wildlife site, its proximity to existing locally designated ecological areas ensures that its continued protection contributes to the overall ecological resilience of the area. Development on this site would not only remove a key component of the local green network, but would also fragment an important wildlife corridor that links hedgerows, nesting habitats, and foraging areas used by birds, insects, reptiles, and small mammals.

Furthermore, maintaining Clive Road Field in its current state poses no adverse effects on any locally designated sites—in fact, the site complements them. It provides:

- Buffering capacity, reducing encroachment pressures on nearby habitats.
- Additional foraging and nesting resources, particularly for species that use both designated and non-designated habitats.

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- Continuity of green space, which is essential for species mobility, pollinator pathways, and biodiversity health.

Because the land is already in long-term community use and has remained undeveloped for decades, it does not create or contribute to any form of environmental harm. Instead, development would introduce the very pressures—habitat loss, disturbance, light pollution, increased footfall concentration—that local designations seek to avoid.

Protection of this space therefore aligns with the principle of preventing harm to locally important ecological assets, by retaining an established, functioning green space that supports wildlife and helps maintain the ecological character of the wider St Athan area.

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4. Sewerage Capacity

There are significant concerns regarding the adequacy and environmental performance of the existing sewerage infrastructure serving the Vale of Glamorgan. While the Vale does not contain 50 sewage treatment works, recent publicly available data and regulatory reporting indicate that a substantial number of licensed Combined Sewer Overflows (CSOs) within the authority area are operating under pressure, with several recorded as discharging in conditions or volumes inconsistent with their environmental permits. This demonstrates a lack of capacity within the existing sewer network and raises questions about the ability of the system to support further growth.

Planning Policy Wales (PPW) requires that new development must be supported by appropriate and sustainable infrastructure, including wastewater treatment systems capable of operating within environmental limits. Development that would place pressure on an already constrained system is inconsistent with the requirements of PPW and risks undermining the objectives within the Integrated Sustainability Appraisal relating to water quality, human health, and environmental protection.

The performance issues identified with CSOs in the Vale indicate that parts of the foul drainage network are operating at, or beyond, their intended capacity. Any additional loading resulting from new residential allocations—such as the proposed development at Clive Road Field and wider St Athan proposed developments—has the potential to exacerbate these pressures, increasing the frequency and duration of CSO discharge events and placing treatment facilities under further strain. This raises concerns not only for environmental compliance, but also for the deliverability of development sites within the RLDP period.

For the RLDP to be considered sound, wastewater infrastructure capacity must be demonstrated and supported by robust evidence. In the absence

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of clear, independently verified confirmation from Dŵr Cymru Welsh Water that the network can accommodate additional growth without increasing the risk of unlawful or environmentally harmful discharges, it cannot be concluded that the plan is deliverable or environmentally acceptable.

Conclusion

Given the documented pressures on CSO performance and the clear statutory requirement for development to be supported by adequate wastewater infrastructure, it is not appropriate to allocate further housing at Clive Road Field until capacity issues are fully assessed and resolved. The allocation is therefore unsound unless the RLDP is amended to ensure infrastructure adequacy is demonstrated prior to development.

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5. Sustainable Transport Failures

Public transport in St Athan is limited, with infrequent buses and indirect rail connections. PPW requires development to be located where sustainable access is realistic. The site is car-dependent and does not meet national sustainability criteria.

Lack of Public Transport and Poor Connectivity to Rail Services

Planning Policy Wales (PPW) places a strong emphasis on sustainable travel, requiring new development to be located where high-quality public transport is available and where reliance on private cars can be minimised. PPW states that development should be directed towards areas that support easy access to public transport networks, reducing the need for car dependency. Because St Athan's bus service is limited to roughly hourly—and sometimes only “every few hours,” making it unreliable for travel to nearby settlements , or connecting rail services—this location does not meet PPW's expectations for sustainable accessibility.

The main train stations serving the area—Rhoose and Llantwit Major—are only reachable via these same infrequent buses, which results in long, unpredictable transfer times and undermines the possibility of using rail for regular commuting. This stands contrary to PPW's requirement that development should be sited to promote integrated transport, where bus and rail connections are convenient, reliable, and realistic alternatives to private car use.

Furthermore, local policy in the Vale of Glamorgan stresses the need for accessible, sustainable transport choices to support development allocations, yet the limited bus frequency and scarcity of taxis in St Athan create a transport network that fails to satisfy these principles. As a result, the site is functionally car-dependent, contradicting both national and local planning goals for reducing carbon emissions, promoting active travel, and ensuring equitable access to services.

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6. Noise and Flight Path Impacts

Despite not sitting directly under the flight path, the site's position **near** active military and civilian aviation routes, combined with extensive testing, maintenance and training operations, creates a noise environment that is highly unsuitable for residential development. Noise levels are unpredictable, intense, poorly mitigated, and incompatible with the amenity expectations of housing. This would lead to long-term conflict between residents and aviation operators and undermine good planning practice.

It is also relevant that the adjacent golf course, which borders Clive Road Field, is required to regularly trim and maintain trees along the shared boundary due to safety and visibility requirements linked to nearby aviation activity. Furthermore, despite being situated *further away* from the flight path than Clive Road Field, the golf club has reportedly been unable to extend its facilities because of its proximity to aviation safeguarding zones.

This demonstrates that even land uses far less sensitive than housing are already constrained by noise, safety, and operational restrictions arising from aviation activity. Introducing new residential development even closer to these constraints would be inconsistent with established safeguarding practice and would exacerbate future amenity and operational conflicts.

7. Archaeological and Historic Constraints

Historical evidence suggests the presence of archaeological assets, including a potential Roman road and human remains nearby. PPW Chapter 6 requires preservation in situation where archaeological sensitivity exists.

There is strong evidence to suggest that Clive Road Field lies within an area of archaeological sensitivity, including records of a historic Roman road

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crossing the site and human remains recovered in the surrounding vicinity. These indicators point to the potential presence of heritage assets of national and regional importance beneath the surface of the field.

Planning Policy Wales (PPW) – Chapter 6: The Historic Environment

Planning Policy Wales Chapter 6 establishes that:

- *“The historic environment is central to Wales’ culture and its character... It is vital that the historic environment is appreciated, protected, actively maintained and made accessible for the general well-being of present and future generations.”*
[\[gov.wales\]](http://gov.wales)
- PPW defines archaeological remains and historic assets — including buried features not yet identified — as non-renewable resources that must be protected.
[\[gov.wales\]](http://gov.wales)

The field forms part of a wider historic landscape associated with the long-established settlement of St Athan and RAF East Camp. Roman activity in the region is well-documented, and the alignment of known Roman routes suggests a likely crossing point in or adjacent to Clive Road Field. The presence of a Roman road would constitute a non-renewable archaeological resource that could be permanently destroyed by groundworks associated with development.

Additionally, the reported discovery of human remains in nearby locations is a strong indicator of past settlement, burial activity, or other historic occupation. Human remains automatically elevate the archaeological sensitivity of the area, triggering statutory duties for investigation and protection. Disturbance of such remains through construction would risk significant harm to the historic environment and could necessitate extensive mitigation, excavation, or legal intervention.

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Given this context, Clive Road Field should be treated as an archaeologically constrained site, where development risks irreversible damage to buried heritage features. Preservation in situ is the preferred national approach where archaeological sensitivity is known or suspected. Allocating the land for development within the RLDP would therefore conflict with established historic environment principles that prioritise avoidance of harm, protection of heritage assets, and cautious management of archaeological uncertainty.

Protecting Clive Road Field from development is consistent with these principles and ensures that any buried archaeological remains — including a possible Roman roadway and associated human activity — are preserved undisturbed for future study.

8. Essential Local Service Capacity and Distance

The Village amenities and St Athan Primary School are approx. 0.8 miles from the site and operating near capacity. Development would increase pressure on school places, conflicting with sustainable infrastructure planning.

The nearest convenience store is Londis, Ash Stores, Rectory Road (CF62 4PF), located approximately 0.7 miles from Clive Road Field.

This exceeds the typical 400–800m “walkable neighbourhood” threshold used in settlement planning and reduces practical access for everyday essentials, particularly for families, older residents, and those with mobility limitations. This distance inevitably increases reliance on private vehicles, contrary to Planning Policy Wales (PPW) principles for sustainable development.

Access to Formal Playing Fields (approx. 1 mile)

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Furthermore, according to the latest Estyn inspection, the school currently accommodates 201 pupils, of whom 149 are of statutory school age, indicating that the school is already close to typical single-form-entry capacity.

Any new housing would add pressure to a school already operating near capacity and may necessitate expansion, classroom restructuring, or increased class sizes — all of which undermine local education quality and sustainability.

The nearest equipped playing fields lie approximately 1 mile from the site, beyond the walking distance normally considered appropriate for children's play and youth recreation. As a result, families are likely to rely on cars for routine recreational trips, reducing opportunities for healthy, walkable community environments.

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9. The Well-being of Future Generations Act

This requires decisions that protect biodiversity, support healthy communities, and safeguard green spaces. Protecting Clive Road Field directly contributes to these statutory goals.

The Replacement Local Development Plan (RLDP) places strong emphasis on Objective 7, which focuses on fostering diverse, vibrant, and connected communities. This objective highlights the importance of protecting green spaces that serve multiple neighbourhoods, enabling social interaction, physical activity, and inter-community connectivity. Protecting green spaces such as Clive Road Field, which directly serves residents of St Athan village, East Camp, and Eglwys Brewis, is fully aligned with this RLDP priority.

Clive Road Field plays a significant role in supporting daily community life and wellbeing. Local dog walkers use the field throughout the day, providing natural opportunities for neighbours to meet, socialise, and build the informal social networks that underpin strong community cohesion. The field operates as a shared, neutral, and accessible community space—a characteristic identified in planning policy as vital to maintaining connected, sustainable communities.

The space is also highly valuable for child development and informal learning. Children use the field to explore nature firsthand, learning about plants, insects, birds, and seasonal changes. Foraging activities such as picking blackberries and sloes provide early environmental education. The adjacent court area allows children to learn bike riding, play football and tennis, and develop independence and confidence in a safe, enclosed environment. These forms of child-led play and exploration cannot be replicated by formal playgrounds or structured sports facilities. Over the years, children have engaged in a wide range of activities that reflect the field's value as an informal, imaginative, and accessible outdoor space: building camps in the hedgerows, organising picnics, flying kites, playing football, blowing bubbles, and building snowmen in winter. These

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experiences contribute significantly to their physical, social, and emotional development and support the RLDP's aim of enhancing future generations' wellbeing.

Additionally, the field demonstrates strong evidence of community stewardship, further reinforcing its social value. Local residents routinely undertake litter-picking, hedge-trimming, and minor maintenance—tasks that have been neglected by the landowner. This voluntary care illustrates both the importance of the field to residents and the strength of local community ownership. Spaces that communities actively maintain are recognised within planning policy as high-value social assets that contribute meaningfully to community resilience and cohesion.

Improving Mental and Physical Health and Wellbeing

The RLDP stresses the value of local accessible green spaces for health and wellbeing. Clive Road Field's daily community use for recreation, walking, children's play, and socialising directly supports this policy.

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10. Access, Community Value and Informal Open Space

The field is openly accessed by residents of East Camp, St Athan village, and Eglwys Brewis. It serves as an informal yet essential community space supporting play, socialising, and mental wellbeing.

Long-Term Public Access and Community Use

For decades, residents have accessed Clive Road Field freely and without the need for permission. The open gate, lack of prohibitive signage, and presence of a dog-waste bin at the entrance all reinforce the reasonable assumption that the land is intended for public use and welcomes local people. The field has therefore functioned as an informal yet vital community space, used openly and consistently for a wide range of everyday activities.

The field supports children's development and informal learning, offering a safe environment for recognising and exploring local plants, birds, insects, and seasonal changes. Families use the space for picnics, free play, ball games, bike-riding, and imaginative activities—all of which are essential forms of unstructured play that formal playgrounds cannot replicate.

Residents of all ages rely on the field for dog walking, socialising, gentle exercise, fresh air, and mental wellbeing. The peaceful, natural setting plays an important role in supporting daily routines, social interaction, and stress reduction, contributing significantly to the wellbeing of the community.

These long-standing patterns of use demonstrate that Clive Road Field is not an unused or incidental space—it is an established, valued part of the community's social, recreational, and emotional landscape, and its loss would have a direct negative impact on local quality of life.

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11. Biodiversity

TAN 5 sets out how the land-use planning system **must contribute to biodiversity and geological conservation**. It emphasises:

- Integrating nature conservation into all planning decisions
- Avoiding loss of habitats or species populations
- Ensuring development provides **net benefit for biodiversity**

Clive Road Field's hedgerows, nesting birds, insects, reptiles, and mammals make it a functioning biodiversity area whose loss would contradict the SPG's ecological protections

Plants and trees	Insects	Birds	Reptile	Mammals
Blackthorne	Butterflies	Sparrow	Slow	Fox
Alder	Essex Skipper	Green	worm	Voles
Fern- (pteridophyte)	Speckled Wood	woodpecker		Harvest
Cornflower	Common	Great spotted		mice
Celandine	Skipper	woodpecker		Field mice
Saxifrage	Small blue	Starlings		Hare
Cowslip	butterfly	Kestrel		
Speedwell	Brimstone	Magpie		
Common	Common blue	Wren		
Dandelion	Large white	Dunnock		
Cuckoo Flower - (Caramine	Peacock	Blue tit		
pratensis)	Comma	Long tailed tit		
Clover Pink - (Dianthus	Painted lady	Goldcrest		
Caryophyllus)	Orange tip	Crows		
Common Vetch	Cinnabar Moth	Great tit		
(vicia Saltiva	Six Spot Burnett	Blackbird		
subsp)	Elephant Hawk	Song thrush		
Meadow Foxtail-	moth	Gold finch		
(Alopecurus	Hummingbird	Green finch		
pratensis)	Hawk moth	Chaffinch		
Sycamore	Meadow	Tree Creeper		
Honey Suckle	Grasshopper	Gulls		
Crocus	Common Green	stonechat		
Fuchsia	Grasshoper			
	Bush Cricket			

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	Indet Rove Beetle Wasp spider 4 spot Orb Weaver Spider, Jumping jack spider, Nursery web spider, Wolf spider, cucumber spider, Labyrinth spider.			
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12. Conclusion and Summary

Protecting Clive Road Field is fully aligned with multiple policies within both the Vale of Glamorgan’s adopted Local Development Plan (2011–2026) and the emerging Replacement Local Development Plan. The adopted LDP places strong emphasis on safeguarding open space as essential community infrastructure and highlights the need to avoid unnecessary development on greenfield land. Likewise, the RLDP Preferred Strategy sets out clear objectives to protect the natural environment, maintain ecological networks, and support the physical and mental wellbeing of local communities—objectives that are directly achieved by retaining Clive Road Field in its current form.

In addition, the Council’s Biodiversity and Development SPG requires the protection of wildlife corridors, habitats, and species diversity. Clive Road Field already supports these functions through its hedgerows, species-rich grassland, and its role as part of a wider ecological network. Collectively, these policy frameworks demonstrate that allocating the site for residential development would conflict with both current and emerging planning policy and would result in the loss of a long-established community asset.

The information provided in this document is true to the best of my knowledge and reflects my observations and understanding of the long-term use, environmental value, and community importance of Clive Road Field.

Maxine Levett

Resident

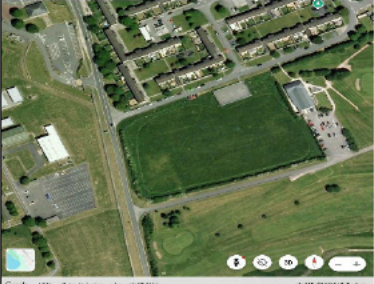
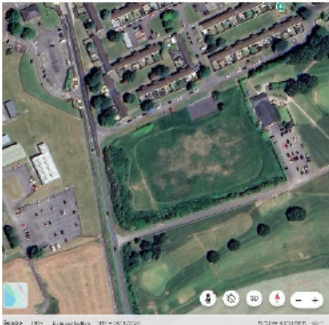


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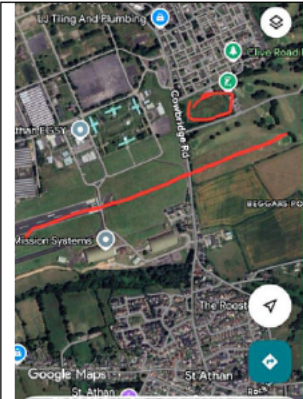
13. Addendum 1 Google maps/ maps and field imagery

Google map images

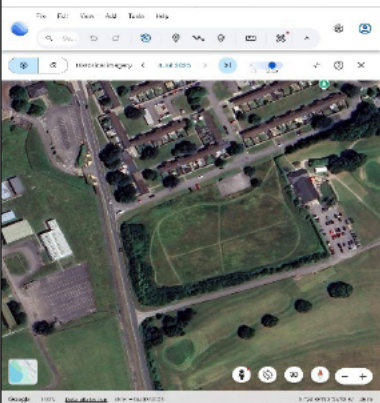
	Aerial view 2006 clearly marks footpaths through and around the field.
	Aerial view 2009 clearly marks footpaths through and around the field
	Aerial View 2023 clearly marks footpaths through and around the field

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Aerial view and proximity to RAF East Camp and flight path.

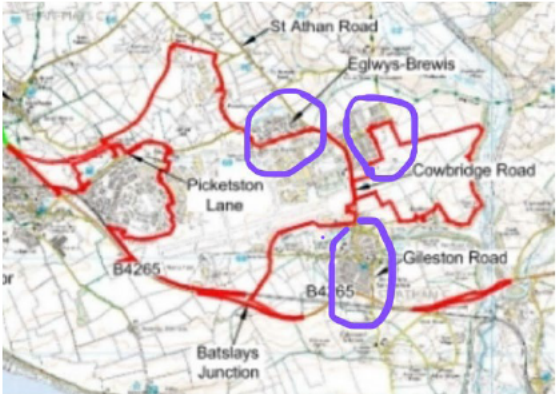


Aerial View 2025 clearly marks footpaths through and around the field

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Ordnance Survey and other maps

 St. Athan parish map	Ordnance Survey of St Athan Parish map. The tip of the red line indicates Clive Road Field at the centre of the Parish, hence the popularity due to proximity to all built up areas.
	Clive Road Field marked in red; the field lays adjacent to Clive Road, East Camp, St Athan. The RAF East Camp Golf Club is to the East and South of the Field.
	Areas from which people access Clive Road Field for recreational activities: <u>Northwest blue circle- the birds estate</u> People walk and drive from this area. <u>North East Blue circle- East Camp and new build area</u> People walk to access the field for recreation and walking dogs <u>South area Blue Circle- St Athan Village</u> People walk and sometimes drive up from St Athan

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	Transfer plans 2019 from MOD; (highlighted in red) state Clive Road field as a play area
	1945 imagery highlighting Clive Road Field as a Communal site
	2007 Map 1 highlighting Clive Road Field as a Playing field on deeds

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	2007 Map 2 highlighting Clive Road Field as a Playing field on deeds
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ACCESS and Field Imagery

	Access is through a gate on Clive Road Field which has a bin and a sign to pick up after your dog. There is a concrete path leading into the field, making it reasonable to assume the site is for public recreation.
	Exit point from the field to Clive Road. The Hedge to the right is the divide to St Athan Golf Course. The concrete path ends several feet into the field.

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	Residents have laid a grid and stones inside the gate to prevent the area becoming too muddy. In addition residents have cut back Blackthorne and done regular litter picks on the site.
	Access to the court area is from Clive Road, and has a concrete path and open gateway. This makes it reasonable to assume that the area is for public recreation and has been used on a regular basis as such.
	Access to the South of the field is onto St Athan Golf Course lane and is an open gap in the hedge. This entrance/ exit is used often by people entering the field from St Athan Village, but is also used as a short cut from the village to East Camp avoiding the main road.

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	A view of the field from the south. The Field edge running alongside the Clive Road houses has a fence, the court and the gate. The West and South sides are bordered by a mixture of trees and hedgerow. The East side bordering the Golf Course has a wire fence and hedgerow. The hedges are used annually for nesting birds and foraging. The hedges form part of the interconnecting wildlife corridors.
	View towards the East side with the Golf course hut visible on the further side of the hedge. The Golf Course is unable to extend due to proximity to the flight path, however Clive Road Field is closer.
	A view of the court/play area from Clive Road entrance

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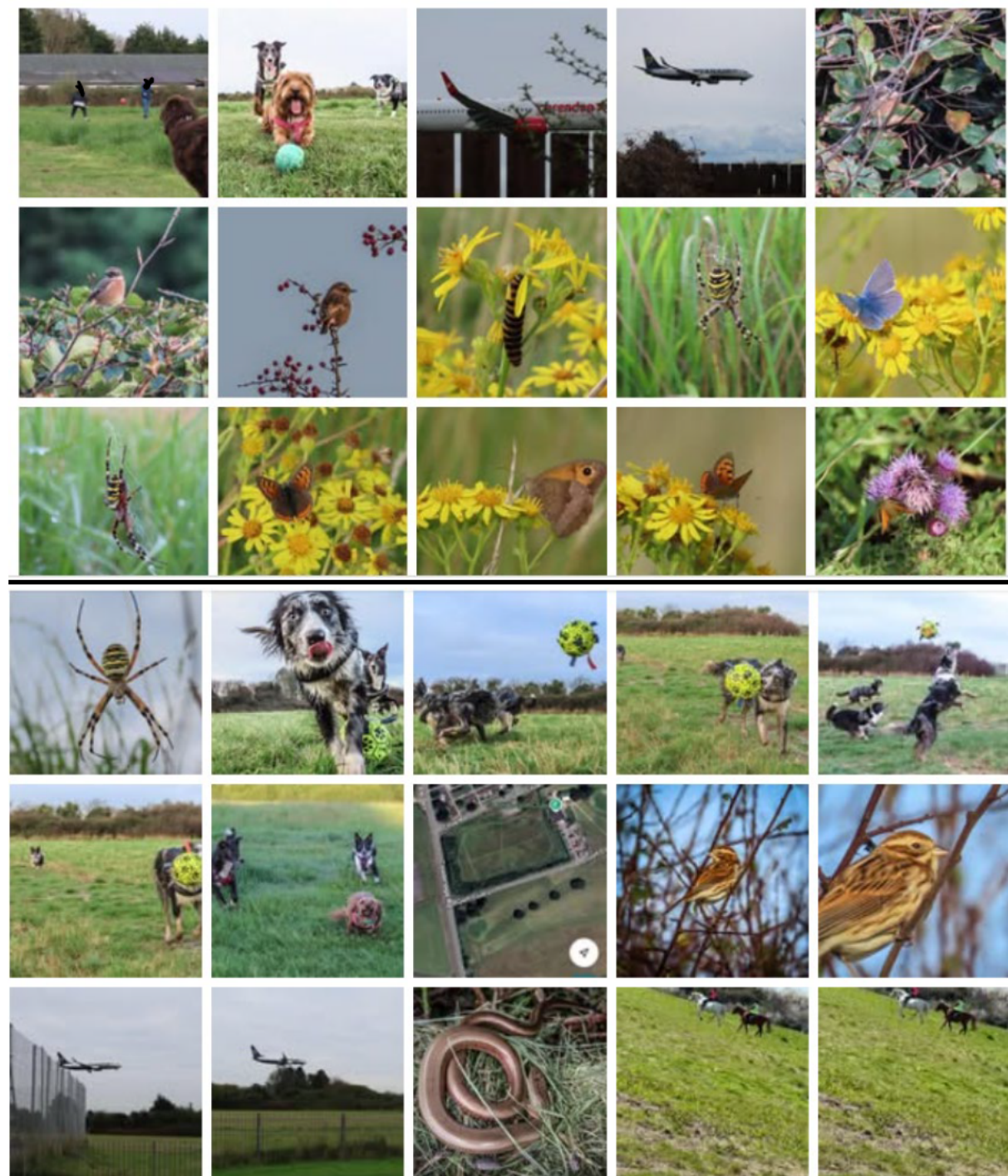
	The fence divider alongside Clive Road. This fence was put up by maintenance on behalf of East Vale Residents Company who commission the maintenance of the area. (Approximately 10 years ago). This was paid for by residents. The proposed entrance to the new build would Residents land that residents have paid for to maintain.
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14. Addendum 2: GENERAL PICTURES OF PUBLIC USES AND BIODIVERSITY IN THE FIELD (Over the years 2005- 2026)



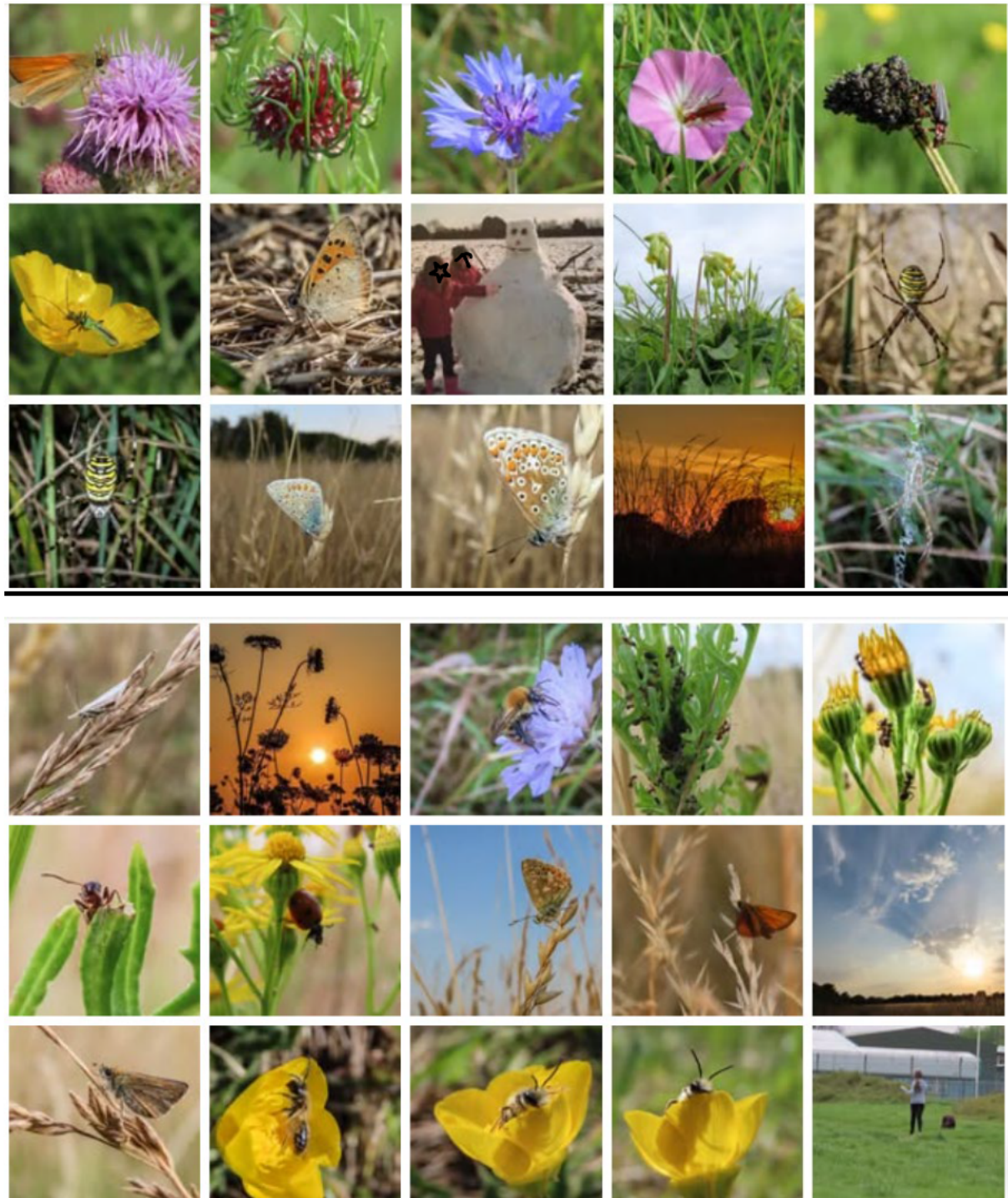
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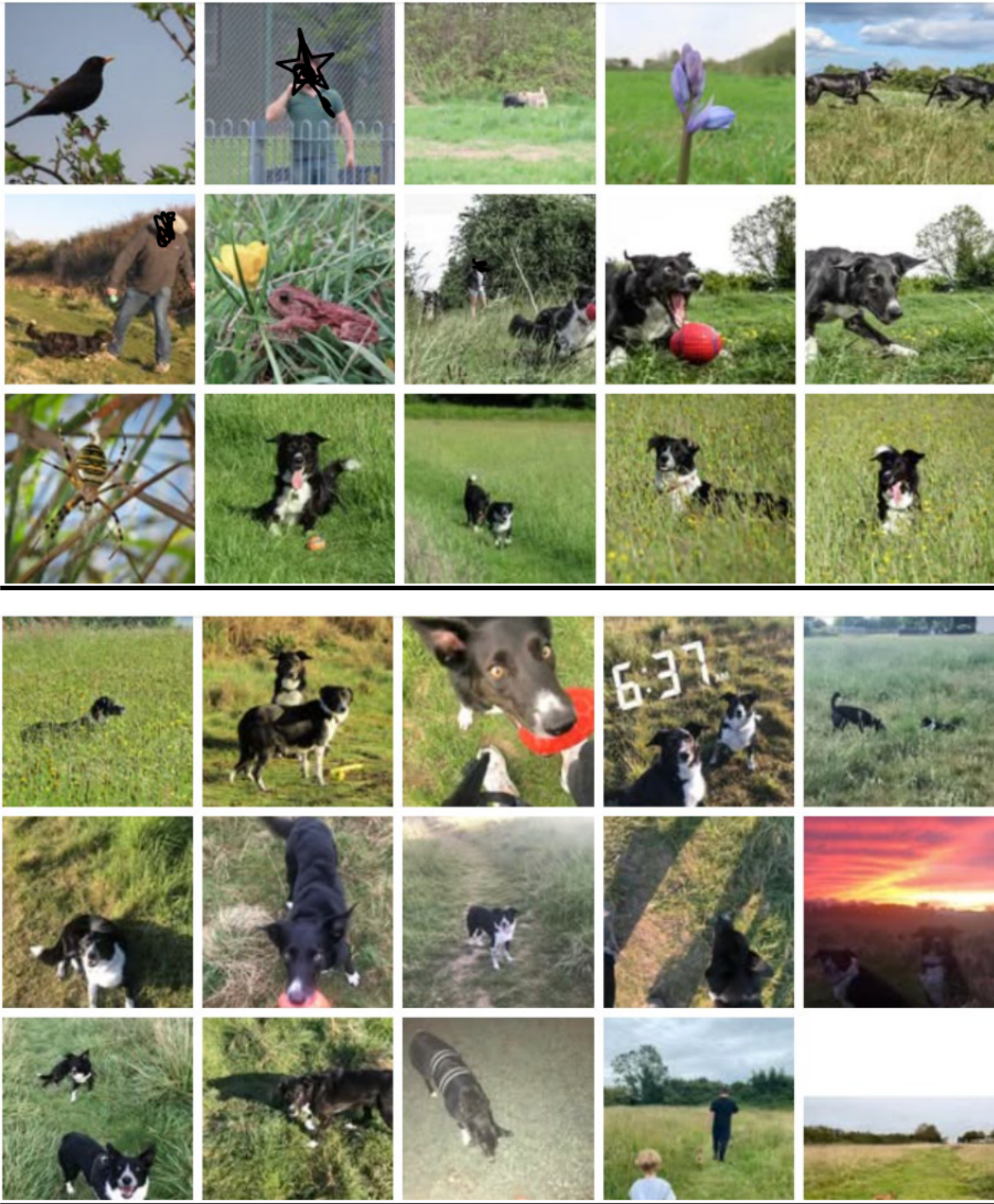
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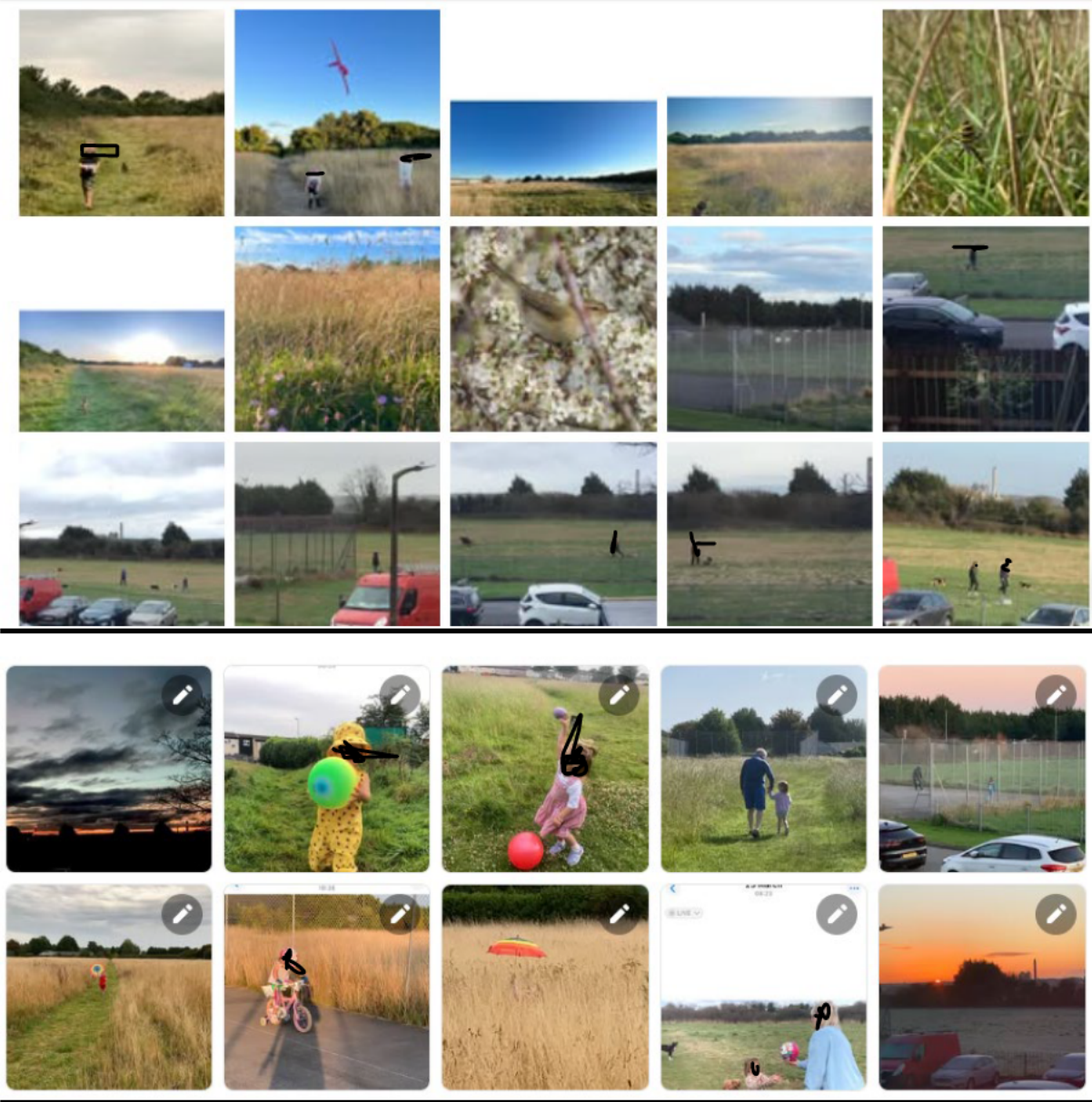
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Maxine Levett

