

HG1 KS1 - LAND AT NORTH WEST BARRY

RLDP public consultation feedback

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Objection re: HG1 KS1: Green Infrastructure, Recreation Spaces and Biodiversity

I object to the plan and rationale for removing the Green Wedge designation, as outlined in *Technical Briefing Note – Green Wedge and Landscape Implications of Expanded Site* (and its annexed reports). The paper broadly argues that the land at Weycock Cross is ‘not necessary’ for the Green Wedge to function.

The paper stating that the land is “**not necessary**” contradicts both the 2015 Inspector and the LDP. They claim the land is not required for the Green Wedge to function, because the gap is still 2.28–2.5 km wide. Yet the 2015 Planning Inspector explicitly found that this site:

- forms an integral part of the pastoral landscape of the GW
- plays a key role in maintaining openness
- development here would be harmful to the Green Wedge’s purpose

PPW is clear that openness, not *distance*, is the core attribute of a Green Wedge. Distance alone is not the measure of coalescence. Character, perception, openness, and containment are. The author misinterprets national policy by reducing it to kilometres.

The paper uses **circular reasoning** – it states the edge is “poor quality” so it is acceptable to build further out. They say that the existing edge is harsh (fences, gardens) and that moving the settlement edge 200m west would “improve” it.

However, this argument is circular and self-serving:

- They are arguing that an already eroded edge justifies eroding it further
- PPW makes clear that Green Wedges exist precisely to stop incremental outward creep and urbanisation
- A poor edge strengthens, not weakens, the case for retaining openness and enforcing settlement containment

It is not logical to argue that because the Green Wedge has already been weakened, it should be weakened further.

The paper **claiming the site is “contained”** ignores visibility from multiple public vantage points. They state development would be visually contained due to landform and woodland. However their own visual appraisal confirms the opposite:

The site is clearly visible from:

- Cwm Ciddy Lane

- A4226 (major approach into Barry)
- Coed-y-Felin and other elevated residential areas
- All existing properties on the eastward boundary of the proposed development

The Inspector previously confirmed the land:

- has an open, undeveloped character
- contributes to the perception of separation

The land is not visually enclosed in any meaningful sense – it is only partially filtered.

The *Technical Briefing Note* likewise significantly underplays the site's **importance as part of a wider connected landscape**. They repeatedly describe the site as “unremarkable” or “low sensitivity”. This contradicts:

- LANDMAP classifications (e.g., High value geological landscape, several Moderate value other layers)
- The Inspector's conclusion that the site is a meaningful part of an undeveloped landscape corridor.

Their argument relies on minimising its landscape value and treating it as an isolated site. It wholly ignores its role as part of a *continuum* of open land between Barry and Rhooose. The Green Wedge designation protects function, not just scenic quality.

The paper also **misrepresents the 2011 Green Wedge Background Paper**: they argue the 2011 paper excluded the site and therefore it is evidence the land is unnecessary. However:

- the 2011 paper was draft evidence, not an adopted designation
- the site was reinserted into the Green Wedge in 2013 during plan refinement
- the Inspector in 2015 accepted the adopted Green Wedge boundary as valid and sound.

The authors selectively quote from early drafts without acknowledging:

- the plan-making process
- consultation process
- evidence refinement
- Ministerial acceptance of the final boundary

Draft boundaries hold no weight compared to adopted ones and appeal decisions.

The paper's claim that the development would be a “controlled expansion” **contradicts PPW**: PPW requires that Green Wedge removal is justified where normal development management policies cannot provide the protection needed. But the paper argues the opposite — that normal policies *can* control expansion. This is self-defeating:

If normal policies can control development on this site, then Green Wedge protection is still necessary, because PPW says the wedge should only be removed where normal policies are *insufficient*.

The paper **assumes housing need automatically justifies Green Wedge deletion**, but PPW is clear: Housing need alone is **not grounds** to delete a Green Wedge. A Green Wedge review must consider:

- functional contribution
- openness
- character
- long-term purpose
- defensible boundaries

Need is only relevant *after* demonstrating the land is no longer necessary for Green Wedge purposes. Their justification reverses the policy sequence.

The paper statement “Still 2.5 km left” is a flawed metric. They argue the gap remaining is still large enough. But **Green Wedges do not operate on minimum distances**. PPW states wedges exist to:

- prevent perceived coalescence
- avoid incremental erosion
- maintain long-term openness

Urbanisation on one side of the wedge can significantly change perception even if substantial distance remains. This is especially important on approach corridors like Port Road West, and from the existing urban settlement boundary.

The paper **overclaims the “logical settlement boundary” argument**. They suggest development would “round off” Barry. But this is a flawed position:

- True rounding-off requires strong, defensible boundaries such as roads, rivers, ridge lines
- Here, the only “boundary” proposed is Cwm Ciddy Lane, a narrow rural lane masked by hedgerows — not a strategic boundary
- Moving the boundary invites further pressure beyond it, undermining the wedge in the long term.

This is precisely the pattern Green Wedges are intended to prevent.

The paper significantly **downplays precedent risk**. The author argues the site is exceptional. However, if this stretch of Green Wedge is removed, it weakens the entire designation because:

- the edge becomes arbitrary rather than principled
- cumulative erosion becomes harder to resist
- other landowners will cite this as precedent

This undermines the historic and strategic role of the Barry–Rhoose green wedge.

Harm to irreplaceable Ancient Semi-Natural Woodland (ASNW) Adjacent to the site

I am also registering a formal objection to the proposed allocation of land at North West Barry based on the findings of the KS1 *Preliminary Ecological Appraisal (May 2025, Persimmon)*. The site contains multiple high-value and legally sensitive ecological receptors - development here would result in significant, unavoidable, and policy-contrary ecological harm, which cannot be mitigated to acceptable levels.

The eastern/southeastern boundary of the site directly adjoins the North East of Knock Man Down Wood (Site of Importance for Nature Conservation), which is also listed as Ancient Semi-Natural Woodland (ASNW). ASNW is classified as an irreplaceable habitat with uniquely high biodiversity, cultural, and soil value. The PEA confirms that this woodland supports:

- a rich canopy of Ash, Sycamore, Sessile Oak, Beech and Yew
- a structurally diverse understorey
- a strong suite of ancient woodland indicator species

The appraisal explicitly notes that the woodland must be retained and protected with a suitable buffer and is highly vulnerable to lighting impacts, trampling and recreational pressure, hydrological changes and surface water pollution.

Development in such immediate proximity contradicts PPW protections for ancient woodland and would inevitably cause deterioration through edge effects, disturbance, drainage changes, and increased human pressure. These long-term effects would be in addition to the hugely detrimental impact of several years of housebuilding activity with associated noise, dust and general disturbance.

Loss and Fragmentation of Priority Hedgerows and Ecological Corridors

The site contains a network of native hedgerows (several of them species-rich), all classified as Priority Habitats under Section 7 of the Environment (Wales) Act 2016. These form:

- bat commuting corridors
- dormouse movement routes
- nesting habitat for tree/shrub nesting birds
- foraging, basking and sheltering habitat for reptiles and amphibians

The PEA states that future development will require hedgerow breaches, which directly threatens habitat connectivity across the site. Such fragmentation is explicitly contrary to the PPW requirement to maintain and enhance ecological networks.

Significant Adverse Impacts on Bats

The appraisal identifies multiple bat species using the site, including:

- Common and Soprano Pipistrelle
- Noctule
- Whiskered, Daubenton's and Serotine

- Brown Long-eared Bat

A day roost is located less than 50m away, and key linear features such as hedgerows, the woodland edge and the central wet ditch act as primary commuting corridors.

Development would cause:

- Loss/breaching of critical flight lines
- Introduction of artificial lighting that disrupts foraging and commuting
- Potential loss of a mature Ash with high roost potential (PRF-M)

Lighting impacts cannot be fully mitigated within a residential estate and would severely degrade the ecological function of the site and adjacent woodland.

Risk to Hazel Dormouse, a European Protected Species

A Dormouse nest was recorded within the site in 2013, and the appraisal confirms the hedgerows and woodland edge:

- provide suitable food sources
- have sufficient structure
- connect directly to high-quality woodland habitat capable of supporting a population

Any hedgerow loss, lighting spill or disturbance could compromise this species. Dormice and their resting places are strictly protected under the Habitats Regulations.

Badger Disturbance and Habitat Fragmentation

Evidence of Badger activity included:

- A fresh latrine
- Well-used pathways
- Badger guard hairs under fences

The survey concludes the site lies within the home territory of a Badger clan and is used for foraging and movement. Development would disrupt these routes and increase risk of harm during construction.

Impacts on Otters and the Local Water Environment

Otters were observed (fresh footprint) in the central wet ditch and frequently recorded in the nearby Nant Talwg watercourse. In addition, otter carcasses have been found and photographed on or near the perimeter of the site as recently as February 2026, indicating an ongoing and active presence at the site. The central ditch mentioned in the report is likely used as a commuting link between the water courses bounding the northern and southern areas of the site, despite seasonal drying.

The appraisal warns of pollution risks from construction and drainage changes, and lighting impacts that could disturb nocturnal movement.

Any development introduces an unavoidable risk of degrading the existing active otter habitat.

Loss of Ground-Nesting Bird Habitat (Including Skylark, a Section 7 Priority Species)

Multiple species were recorded, including **Skylark**, **Song Thrush** and **House Sparrow**, all Section 7 Priority Species. The open fields may support ground nesting birds later in the season. Development would:

- remove nesting habitat
- increase predation and disturbance
- cause irreversible loss of farmland bird territory

Impacts on Reptiles, Amphibians and Invertebrates

Field margins, the wet ditch, hedgerows and woodland edge support:

- Slow Worm
- Common Frog
- Amphibian foraging habitat
- Priority invertebrates (in adjacent woodland)

These habitats would be permanently lost or degraded.

Conflict with the B-Lines Pollinator Network

The southern part of the site lies within the national B-Lines network, designed to safeguard insect movement across fragmented landscapes. Development would remove this stepping-stone habitat and break the corridor.

The Site Cannot Deliver PPW's Required 'Net Benefit for Biodiversity'

Under PPW Edition 12 (2024) and recent Chapter 6 updates, all development **must deliver a net benefit for biodiversity** and apply the stepwise approach (avoid → minimise → mitigate → compensate). According to the PEA:

- the most sensitive habitats are *at the boundaries*
- these same boundaries are where the greatest development pressure will fall
- development would inevitably cause loss and deterioration of habitat connectivity and introduce artificial lighting and disturbance

Given the site context, it is **not possible to avoid or fully mitigate harm**, despite a blithe assurance in HG1 KS1 that *"The provision of a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant biodiversity enhancements."* **To somehow suggest that simply by leaving a small area of open space while building 376 houses on an already-biodiverse greenfield site will in any way make a net contribution to biodiversity is utterly false.**

The PEA clearly demonstrates that the site contains:

- multiple Priority Habitats
- several legally protected species
- an adjoining irreplaceable ancient woodland
- key ecological corridors of regional significance

Development would lead to unavoidable ecological harm, contrary to:

- Planning Policy Wales (PPW) Edition 12
- The Environment (Wales) Act 2016, Sections 6 & 7
- TAN 5: Nature Conservation & Planning
- Local LDP policies SP10, MG20, MG21 and MD7

For these reasons, the allocation of this land for development is ecologically unsound and should be removed from the RLDP.