

Vale of Glamorgan

Deposit Replacement Local Development Plan

Public Consultation

Local resident RLDP consultation feedback based on review of RLDP information and supporting documents as hosted on RLDP website <https://valeofglamorgan.oc2.uk/>

Site : HG1 KS1 North West Barry (Weycock Cross)

Objection

Topic: KS1: Green Infrastructure, Recreation Spaces and Biodiversity

Ref: NWB_RLDP_JVN_006

Submitted by: [REDACTED]

Date: 10th March 2026

HG1 KS1: Green Infrastructure, Recreation Spaces and Biodiversity

Ref: NWB_RLDP_JVN_006

I object to the proposed removal of the Green Wedge designation and the allocation of land at North West Barry (HG1 KS1), as set out in the *Technical Briefing Note – Green Wedge and Landscape Implications of Expanded Site* and its annexed reports. The rationale presented is **methodologically flawed, inconsistent with national policy, and directly contradicts** the findings of the 2015 Planning Inspector and the adopted LDP.

1. Misinterpretation of Green Wedge Policy and Contradiction of Inspector Findings

The Technical Briefing Note asserts that the land is “not necessary” for the Green Wedge to function because a gap of 2.3–2.5 km would remain. This is fundamentally unsound.

The 2015 Planning Inspector explicitly concluded that this site:

- forms an integral part of the pastoral landscape of the Green Wedge
- plays a key role in maintaining openness
- would be harmed by development

Planning Policy Wales (PPW) is clear that **openness**, not distance, is the defining attribute of a Green Wedge. Coalescence is assessed through character, perception, openness, and containment—not kilometres. The Briefing Note misinterprets national policy by reducing it to a numerical metric.

2. Circular and Self-Serving Reasoning

The Briefing Note argues that because the existing settlement edge is “poor quality” (fences, gardens), extending the settlement boundary 200 metres west would “improve” it.

This reasoning is circular:

- it uses previous erosion of the Green Wedge to justify further erosion
- PPW states that Green Wedges exist **precisely to prevent** incremental outward creep and urbanisation
- a degraded edge strengthens, rather than weakens, the case for retaining openness

It is **illogical** and **contrary to PPW** to argue that because the Green Wedge has *already* been weakened, it should be weakened *further*.

3. Incorrect Claims of Visual Containment

The Briefing Note claims the site is visually contained due to landform and woodland. However, its own visual appraisal confirms the opposite.

The site is clearly visible from:

- Cwm Ciddy Lane
- the A4226 (major approach into Barry)
- Coed-y-Felin and other elevated residential areas
- all existing properties on the eastern boundary

The Inspector previously confirmed that 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.

4. Understatement of Landscape Importance

The Briefing Note repeatedly describes the site as “unremarkable” or of “low sensitivity”. This contradicts:

- **LANDMAP classifications**, including a *High-value geological landscape* and several *Moderate-value* layers
- the Inspector’s conclusion that the site forms part of a meaningful undeveloped landscape corridor

The assessment treats the site as an isolated parcel, ignoring its role as part of a continuous open landscape between Barry and Rhoose. Green Wedge designation **protects function**, not merely scenic quality.

5. Misrepresentation of the 2011 Green Wedge Background Paper

The authors argue that because the 2011 draft paper excluded the site, it is unnecessary. This is misleading:

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

Selective quoting from early drafts ignores the plan-making process, consultation, evidence refinement, and Ministerial approval.

6. Incorrect Application of PPW Tests for Green Wedge Deletion

The Briefing Note claims development would be a “controlled expansion”. This contradicts PPW, which states that Green Wedges should only be removed where **normal development management policies are insufficient** to protect openness.

The paper argues the opposite: that normal policies *can* control expansion. This is self-defeating. If normal policies suffice, then Green Wedge protection remains necessary.

The paper also assumes that housing need justifies deletion. PPW is explicit: **housing need alone is not grounds for removing a Green Wedge.**

7. Flawed “2.5 km Gap” Argument

The claim that “2.5 km would remain” is a flawed metric. Green Wedges do not operate on minimum distances. PPW states that wedges exist to:

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

Urbanisation on one side of a wedge can significantly alter perception even if distance remains.

8. Weak and Non-Defensible Boundary Proposal

The Briefing Note argues that development would “round off” Barry. This is incorrect.

True rounding-off requires strong, defensible boundaries such as:

- major roads
- rivers
- ridgelines

Here, the only proposed boundary is **Cwm Ciddy Lane**, a narrow rural lane screened by hedgerows. This is not a strategic boundary. Moving the boundary westwards invites further pressure beyond it, undermining the Green Wedge in the long term.

9. Precedent Risk

If this section of the Green Wedge is removed:

- the boundary 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.

10. Ecological Objections

The *KS1 Preliminary Ecological Appraisal (May 2025)* identifies multiple high-value and legally sensitive ecological receptors. Development would result in significant, unavoidable, and policy-contrary ecological harm.

10.1 Harm to Irreplaceable Ancient Semi-Natural Woodland (ASNW)

The site adjoins the **North East of Knock Man Down Wood**, a SINC and designated **ASNW**. The PEA confirms:

- a rich tree canopy (Sycamore, Ash, Yew, Sessile Oak and Beech)
- a diverse understorey
- numerous ancient woodland indicator species

The woodland is highly vulnerable to:

- hydrological changes
- surface water pollution
- lighting impacts
- trampling and recreational pressure

Development would inevitably cause deterioration through edge effects and disturbance, not only for the long term, but also during the construction phase.

10.2 Loss and Fragmentation of Priority Hedgerows

The site contains species-rich native hedgerows, all **Priority Habitats** under Section 7 of the Environment (Wales) Act 2016. These provide:

- nesting habitat for a variety of birds
- bat commuting corridors
- dormouse movement routes
- reptile and amphibian foraging

Development will result in hedgerow breaches and contamination, fragmenting ecological connectivity.

10.3 Adverse Impacts on Bats

Multiple bat species use the site, including:

- Brown Long-eared Bat
- Common and Soprano Pipistrelle
- Whiskered, Daubenton's, Serotine
- Noctule

A day roost lies less than 50 metres away. Development would:

- introduce harmful lighting
- risk loss of mature Ash with high roost potential
- sever flight lines
-

10.4 Risk to Hazel Dormouse (European Protected Species)

A Dormouse nest was recorded in 2013. The PEA confirms the hedgerows:

- provide suitable food sources
- connect directly to high-quality woodland
- have sufficient structure

Any impact on hedgerows or lighting spill risks harming this strictly protected species.

10.5 Badger Disturbance

Evidence includes:

- a fresh latrine
- well-used pathways
- guard hairs under fences

The site lies within a Badger clan's territory. Development would disrupt foraging routes and increase risk of harm.

10.6 Impacts on Otters

Otters were recorded in the central wet ditch and nearby Nant Talwg watercourse. Carcasses have been found on or near the site, most recently in February 2026. Mention is made in the report of the central ditch which serves as an otter commuting link between the water courses bounding the northern and southern areas of the site, regardless of seasonal drying.

Development introduces unavoidable risks from:

- pollution
- drainage changes
- lighting disturbance

10.7 Loss of Ground-Nesting Bird Habitat

Species recorded include:

- Skylark (Section 7 Priority Species)
- Song Thrush
- House Sparrow

Development would remove nesting habitat and cause irreversible loss of farmland bird territory.

10.8 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

These habitats would be permanently lost or degraded.

10.9 Conflict with the National B-Lines Pollinator Network

The southern part of the site lies within the national **B-Lines** network. Development would remove stepping-stone habitat and break the corridor.

11. Failure to Deliver PPW's Required "Net Benefit for Biodiversity"

PPW Edition 12 requires all development to deliver a **net benefit for biodiversity** and follow the stepwise approach (avoid → minimise → mitigate → compensate).

The PEA demonstrates that:

- the most sensitive habitats lie at the boundaries
- these boundaries face the greatest development pressure
- harm cannot be avoided or fully mitigated

The developer's claim that leaving a remnant of the existing greenfield plot as an "open space buffer" would in some way deliver "significant biodiversity enhancements" is unsubstantiated and wholly contradicted by the ecological evidence.

Conclusion

The allocation of this land is ecologically unsound, contrary to national and local policy, and should be removed from the RLDP.