

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 11 - Full Representations on the Green Infrastructure Strategy

August 2026



RLDP

CDLN



Introduction to Representations Register

This Representations Register provides a copy of the duly made representations received in response to the Deposit Replacement Local Development Plan (RLDP) public consultation, which took place between 28 January 2026 and 11 March 2026. It has been published in accordance with Regulation 19 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

The Register does not include representations that were not duly made, namely those submitted outside the consultation period or submitted anonymously or without contact details. It also excludes representations that have been withdrawn.

Due to the high number of duly made representations received (over 2,700), it has been necessary to divide the Register into volumes arranged in the order that the policy or proposal appears in the RLDP. Where more than one representation was received on the policy, this has been arranged by representation number.

Volume 1 provides a summary of all representations.

Volumes 2 to 6 contain the full text of representations relating to the Plan itself.

Volumes 7 to 12 contain representations relating to other parts of the evidence base.

The Volumes are as follows:

- Volume 1 – Summary Representations
- Volume 2 – Full Representations on Introduction, Policy Context, Key Characteristics, Themes, Vision and Objectives and Sustainable Growth Strategy and consultation process
- Volume 3 – Full Representations on the Policy Framework (Excluding Key Sites and Housing Allocations)
- Volume 4 - Full Representations on Key Sites (HG1 KS1-KS5)
- Volume 5 – Full Representations on Housing Allocations (HG1, HG2, HG3, HG4)
- Volume 6 – Full Representations on Appendices
- Volume 7 – Full Representations on Background Papers
- Volume 8 - Full Representations on the Integrated Sustainability Appraisal and Habitats Regulations Assessment
- Volume 9 - Full Representations on Candidate Sites
- Volume 10 – Full Representations on the Draft Healthy Placemaking Supplementary Planning Guidance
- Volume 11 - Full Representations on the Green Infrastructure Strategy
- Volume 12 – New Site Submissions

Representations are published in the language in which they were originally submitted. Only one representation was received in Welsh, and an English translation has been provided alongside the original Welsh text.

Where representations were submitted by email, representation form, or letter rather than through the online consultation portal, the original submission has been attached. A redacted version of the submission can be downloaded via the link provided under the 'Attachments' heading at the end of the relevant representation.

All representors will have been notified of their individual respondent number, which can be used to help locate specific representations. This number is shown in brackets next to the respondent's name. Each representation also has its own unique reference number, which can be found at the top of the representation.

Please note that if you submitted representations on multiple sections of the RLDP and/or supporting documents, your representation(s) may appear in more than one volume.

4792

Object

Document Element: Consultation Document, Draft Green Infrastructure Strategy

Respondent: Ms Maxine Levett [698]

Summary:

The RLDP's Green Infrastructure (GI) Strategy appears to overlook several significant local biodiversity assets:

- Aberthaw Biodiversity Area (Council owned and agreed for retention).

An area with clear potential for designation such as Local Nature Reserve (LNR).

- Cadoxton Ponds Nature Reserve, a major ecological asset not reflected in GI mapping.
[gov.uk]

- Other sites already being considered by Scrutiny for LNR status (e.g., Barry Old Harbour, Rhose Point), demonstrating an active Council interest in expanding nature designations.

These omissions raise questions about:

- Whether the GI Strategy has adequately captured local ecological opportunities;
- Who authored and quality assured the document, given factual omissions (e.g., mis counting bathing beaches) and lack of reference to key local sites;
- Whether biodiversity "net gain" claims are being interpreted proportionately, rather than reduced to minimal measures such as bird boxes.

Welsh Government expects the RLDP to be evidence led and based on a robust environmental baseline.

Could you confirm:

- Whether Aberthaw, Cadoxton Ponds, and related sites will be added to the GI evidence base;
- Who prepared and signed off the current GI content;
- How biodiversity requirements will be strengthened to reflect site specific ecological value.

Full text:

I hope you are well. I'm writing to raise several concerns regarding the way the Replacement Local Development Plan (RLDP) currently interprets Future Wales: The National Plan 2040, particularly in relation to spatial strategy, rural policy requirements, and biodiversity designations. I would appreciate clarification on the following points.

1. Future Wales – Growth Area Classification

The RLDP appears to assume that the Vale of Glamorgan is a "growth area," but Future Wales does not classify the Vale—especially the western Vale—as part of the Cardiff, Newport and the Valleys National Growth Area.

Key points:

- Future Wales identifies specific National Growth Areas, and the Vale is not within them.
- The document additionally defines countryside communities, covering rural parts of Wales including the western Vale.
- Welsh Government stresses that LDPs must be in general conformity with Future Wales, which makes the spatial designation critical for soundness.

Could you please confirm:

- Where Future Wales designates the Vale (or the western Vale) as a growth area; and
- The evidence used by the RLDP team to justify treating the authority as such.

2. Applicability of Future Wales Policies 4 & 5 to the Western Vale

Given that the western Vale is identified as a rural area, Future Wales Policies 4 and 5 must apply:

- Policy 4: LDPs must identify rural communities, assess their needs, and set out supportive policies.
- Policy 5: LDPs must plan positively to meet the employment needs of rural areas.

Bullet point issues:

- The western Vale is clearly categorised as rural, not as a growth-focused settlement zone.
- St Athan may have distinct airport related status, but this does not reclassify the surrounding rural settlements.
- The RLDP should demonstrate how Policies 4 and 5 are shaping its spatial and economic approach.

Could you outline how the RLDP intends to incorporate Policies 4 and 5 into its strategy?

3. Biodiversity & Green Infrastructure – Key Omissions

The RLDP's Green Infrastructure (GI) Strategy appears to overlook several significant local biodiversity assets:

- Aberthaw Biodiversity Area (Council owned and agreed for retention).

An area with clear potential for designation such as Local Nature Reserve (LNR).

- Cadoxton Ponds Nature Reserve, a major ecological asset not reflected in GI mapping.

[gov.uk]

- Other sites already being considered by Scrutiny for LNR status (e.g., Barry Old Harbour, Rhooose Point), demonstrating an active Council interest in expanding nature designations.

These omissions raise questions about:

- Whether the GI Strategy has adequately captured local ecological opportunities;
- Who authored and quality assured the document, given factual omissions (e.g., mis counting bathing beaches) and lack of reference to key local sites;
- Whether biodiversity "net gain" claims are being interpreted proportionately, rather than reduced to minimal measures such as bird boxes.

Welsh Government expects the RLDP to be evidence led and based on a robust environmental baseline.

Could you confirm:

- Whether Aberthaw, Cadoxton Ponds, and related sites will be added to the GI evidence base;
- Who prepared and signed off the current GI content;
- How biodiversity requirements will be strengthened to reflect site specific ecological value.

4. Next Steps

I would welcome clarification on the above matters and would be grateful for the opportunity to discuss how the RLDP can better reflect:

- The correct Future Wales spatial classification;
- The requirements of Policies 4 and 5 for rural areas;
- Local biodiversity assets and LNR opportunities;
- A stronger evidence-based approach consistent with Welsh Government expectations.

Thank you for considering these points. I appreciate the significant work undertaken on the RLDP and hope these observations are useful in ensuring the plan is fully aligned with national policy and local opportunities.

Attachments:

Email Representation - Redacted - <https://valeofglamorgan.oc2.uk/a/sfw>

6255

Object

Document Element: Consultation Document, Draft Green Infrastructure Strategy**Respondent:** Barry & Vale Friends of the Earth [708]**Agent:** Barry & Vale Friends of the Earth**Summary:**

This document falls well short of professional standards, with errors and omissions.

It should have covered all wildlife sites

The CBA body who wrote it are unidentified, with all details blacked out. They make no declaration of professional standards, so cannot be taken to be committed to accuracy and truthfulness as the WGvt requires of consultants.

At the public session, the LDP officer said one of his colleagues would have checked it to get the VoG badging. That can't apply to all as any local resident would have know of error (number of bathing beaches) and omissions.

SINCs are mentioned, that there was a review but no report of the results

LNRs are mentioned but not their statutory designation and linkage with the 1981 WCA (as amended) and the Section 7 responsibility of LAs under EnvWalesAct. No mention that management policies for LNRs is required in LDPs

No mention of the scope and need for extending LNRs with Barry Old Harbour, Rhose Point, Cadoxton Ponds and Aberthaw nature reserve designations being raised. Indeed the last two are not listed though most important nature conservation sites, one owned by Dow and the other by CCR.

Bathing Beaches are mentioned but wrong number and nothing about sewage affecting them and the problems of the LA having to manage them with duties under the Bathing Water Regs.

No mention is made of the Wales Coast path, which VoG manages on behalf of NRW. Gaps in it and proposals to remedy them need listing in the RLWP.

No mention made of the designated "quiet areas" and responsibility of the Council to review and extend them countywide under the Air quality and Soundscapes (Wales) Act.

The worst werror is saying NBB – net biodiversity benefit is required for development. That's in England, indicating this "consultant" practices there (or is based overseas). In Wales we require biodiversity is enhanced proportionate to scale and nature of the development. the RLDP checker would have been very conscious of this difference. The LPA's problem is they hang on to the English requirement rather than the Welsh one. Perhaps it was one of them who ensured keeping the serious error.

We conclude the GI document is important, so needs to be reasonably accurate. This one won't do, and should be fully revised to meet professional stands.

Full text:

This document falls well short of professional standards, with errors and omissions.

It should have covered all wildlife sites

The CBA body who wrote it are unidentified, with all details blacked out. They make no declaration of professional standards, so cannot be taken to be committed to accuracy and truthfulness as the WGvt requires of consultants.

At the public session, the LDP officer said one of his colleagues would have checked it to get the VoG badging. That can't apply to all as any local resident would have know of error (number of bathing beaches) and omissions.

SINCs are mentioned, that there was a review but no report of the results

LNRs are mentioned but not their statutory designation and linkage with the 1981 WCA (as amended) and the Section 7 responsibility of LAs under EnvWalesAct. No mention that management policies for LNRs is required in LDPs

No mention of the scope and need for extending LNRs with Barry Old Harbour, Rhose Point, Cadoxton Ponds and Aberthaw nature reserve designations being raised. Indeed the last two are not listed though most important nature conservation sites, one owned by Dow and the other by CCR.

Bathing Beaches are mentioned but wrong number and nothing about sewage affecting them and the problems of the LA having to manage them with duties under the Bathing Water Regs.

No mention is made of the Wales Coast path, which VoG manages on behalf of NRW. Gaps in it and proposals to remedy them need listing in the RLWP.

No mention made of the designated "quiet areas" and responsibility of the Council to review and extend them countywide under the Air quality and Soundscapes (Wales) Act.

The worst werror is saying NBB – net biodiversity benefit is required for development. That's in England, indicating this "consultant" practices there (or is based overseas). In Wales we require biodiversity is enhanced proportionate to scale and nature of the development. the RLDP checker would have been very conscious of this difference. The LPA's problem is they hang on to the English requirement rather than the Welsh one. Perhaps it was one of them who ensured keeping the serious error.

We conclude the GI document is important, so needs to be reasonably accurate. This one won't do, and should be fully revised to meet professional stands.

Attachments:

Supporting Document - <https://valeofglamorgan.oc2.uk/a/tdw>

6676

Support

Document Element: Consultation Document, Draft Green Infrastructure Strategy**Respondent:** Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS.

We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5). Please note that our State of Natural Resources Report (SoNaRR) is now in its third assessment with SoNaRR 2025 recently published (January 2026).

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.

We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.

1. Summary

We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.

However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be

helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration

at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already

made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

- does not cause detriment to the maintenance of the favourable conservation status of protected species;
- results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to

mitigate the potential adverse effects, through design stipulations and policy inclusions.

The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in

order to help establish appropriate protection and/or enhancement measures.

We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of

Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording

Strategic Policies

Strategic Policy SP19 – Green Infrastructure

We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.

This could be resolved by a new criterion such as:

"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment (and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."

To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:

"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".

We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.

We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.

This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.

Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.

Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience

We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.

We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory

designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.

By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53). We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful

for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.

Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting

the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.

With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.

As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the

requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure

Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7

We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological connectivity.

Policy DPN8

Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites

We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:

"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

EMP1 – Employment Regeneration Opportunity Areas

We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of

the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas

This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.

This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan

We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites

Overview

We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure

Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:

- It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
- To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;

We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity

A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones

Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments

KS1 – Land at North West Barry

Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.

Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1

under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road

Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way

Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates

that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm

Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan

Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations

Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane

Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.

HG1 (2) Land at the Mole

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)

Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that

Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.

Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites

HG4 (1) Land to the East of Colwinston

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations

SP14 (1) Land east of Cardiff Airport, Rhooose

Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning

application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhosce

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park

Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a greater scale to better inform allocation.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol

Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations

SP14 (5) Atlantic Trading Estate, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)

Marine and Coastal Physical Processes

Coastal Squeeze

We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on greenfield sites adjoining the estuary".

We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to undertake works to coastal structures.

Loss of Functionally Linked Habitat

As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.

Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore agree with this conclusion.

In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has

been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan.

Policy DNP8

We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)

Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome. We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure

Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.

We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by

Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)

We have reviewed the submitted SFCA and agree with the scope of the assessment made.

We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)

We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Attachments:

Email representation redacted - <https://valeofglamorgan.oc2.uk/a/3pq>