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The Vale of Glamorgan Council,
Development Control,
Dock Office,
Barry, CF63 4RT

23/06/2017

Re: 2016/01441/FUL, Cosmeston Lakes, Cosmeston Country Park, Lavernock Road, Penarth – wakeboarding planning application.

Dear Sir/Madam,

I would like to register my objection to the above application for the following reasons:

1. This proposal is likely to constitute an Operations Likely to cause Damage (OLD) listed for this SSSI, namely sections:
“11. Destruction, displacement, removal or cutting of any plant or plant remains.”
“21. Destruction, construction, removal, rerouting, or regrading of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks, including soil and rock exposures.”
“27. Recreational activities likely to damage the qualifying features.”

Reference document

https://naturalresources.wales/media/645230/SSSI_0518_PDO_EN0018769.pdf

I can't see how this can proceed without Natural Resources Wales approval under SSSI legislation.

2. Increased pressure on habitat and biodiversity through development elsewhere in the South Eastern Vale of Glamorgan will increase the importance of remaining habitat such as this.
3. This development will increase levels of traffic to an already congested area.
4. Potential impact to Water Voles recently released in the area.
5. Likely breach of Environment (Wales) Act 2016 Section 7. A number of species identified in the ecology report are on the “list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.”
6. Inconsistent ecological reporting. The ecological report relies heavily on South East Wales Biodiversity Records Centre (SEWBReC) records and desk top survey methodologies. These records are largely based on voluntary biological record submissions. Given the season in which the survey was undertaken it could be assumed that these were the only methods likely to provide results. I note Otters, for example, are not featured on the SEWBReC report however the Vale of Glamorgan Council “Lakes and Ponds” page states “*Secretive otters can*

be seen around the west lake this is an ideal habitat for otters as fish are abundant. Roach, Rudd and Bream form large shoals in the east lake..”

Ref. <http://www.valeofglamorgan.gov.uk/en/enjoying/Coast-and-Countryside/Habitats-and-Wildlife/Lakes-and-Ponds.aspx>. It is also noted that only one reference to the common frog was found in these survey, again this reflects on the deficiencies of the survey techniques rather than low populations of these species. A field survey, if conducted two or three weeks later, would have revealed many spawning frogs and toads.

7. The bridge next to the proposed development area has been used as a platform for dumping and tipping for many years prior to formalisation of the site as a Park. Consequently there are many hazards in this area of the lake constituting a health and safety risk to potential wakeboard system users.

Many Thanks,

Julian Wynn