



Glamorgan Bird Club
Registered Charity No. 1129684

Mr. Ceri Jones, Secretary
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Date: 30 June 2017

Mrs Y. J. Prichard
Planning Officer
Vale of Glamorgan Council
Development Control
Dock Office, Barry
CF63 4RT

Dear Mrs Prichard

Planning Application Ref: 2016/01441/FUL – Cosmeston Wakeboarding

I write to you on behalf of Glamorgan Bird Club, which was established in 1990. It is a registered charity whose objects include conservation of the bird life of East Glamorgan, including the Vale of Glamorgan. The vast majority of the Club's members live in East Glamorgan and a number are regular birdwatchers at Cosmeston Lakes Country Park. The Club's members conduct bird surveys for the British Trust for Ornithology (BTO), the Wildlife Trust for South & West Wales and the RSPB.

Glamorgan Bird Club's Committee has reviewed and objects to the current planning application to install wakeboarding facilities at the west end of Cosmeston's East Lake.

Cosmeston Lakes is a very important site for birds in East Glamorgan, and especially for wildfowl in autumn, winter and spring. Recent surveys at Cosmeston show the following peak counts: Tufted Duck – 329 (Feb), Pochard – 78 (Feb), Mute Swan – 56 (Mar), 47 (Apr) and 55 (Sep), Mallard – 122 (Aug) and Canada Geese – 268 (Sep).

The peak counts for Tufted Duck and Pochard are the highest for any site in East Glamorgan. Moreover, Cosmeston Lakes is easily the most important site in the Vale of Glamorgan for all 5 species listed above (source: East Glamorgan Bird Report).

The Cosmeston Wakeboarding planning application proposes that "Operation of the Wake Park will be from late March to the end of October to avoid impacts to wintering wildfowl".

However, the survey data actually shows that peak counts for Mute Swan occur in March, April and September, for Canada Geese in September and for Mallard in August. So if the Wake Park is operational in March August and September, then this will not “avoid impacts to wintering wildfowl”.

Whilst the West Lake is a conservation area and less disturbed than the East Lake, birds use both lakes. There is significant movement between the two, often by overflying the trees along the central path between the lakes. There is a risk of birds colliding with the wakeboarding cables, especially in those months when bird numbers are higher. Swans and geese are not the most agile of flyers, with swans often striking power cables.

The western end of Cosmeston’s East Lake (i.e. the area both directly under and close to the proposed location of the wakeboarding cables) is often favoured by the Tufted Duck flock and other birds. This is particularly so in periods of stronger prevailing westerly winds (including south westerly and north westerly), when the significant shelter offered by the trees along the central path makes the waters of the western end of the East Lake much calmer. At times there can be over 250 birds on the water in this sheltered area.

The Cosmeston Wakeboarding application makes no proposal to address the danger to birds caused by its cable infrastructure.

In both 2016 and 2017, there has been evidence of Kingfishers using the bank at the west end of the East Lake for attempted breeding (i.e. the bank immediately adjacent to the proposed Wakeboarding installation). A pair of birds was observed visiting a probable nest site there on multiple occasions in 2016, and in 2017 a pair has been observed flying to this location from the West Lake, with one of the birds thought likely to be carrying food.

As noted in the applicant’s Ecological Baseline Report, Kingfisher is a protected species under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). The applicant says it will take appropriate measures during the construction phase, but it does not address and it is very difficult to see how it will avoid disturbance of breeding Kingfisher if wakeboarding becomes operational.

Glamorgan Bird Club objects to the planning application.

If the Planning Committee is minded to approve the application, then Glamorgan Bird Club asks that the planning consent:

- Limits Cosmeston Wakeboarding’s months of operation to mid-April to mid-August inclusive (when wildfowl numbers are lower);
- Requires that Cosmeston Wakeboarding’s water-surface equipment and in particular its cables are removed outside this season.

Yours sincerely
For Glamorgan Bird Club

Ceri Jones
Secretary