**2016/01441/FUL**

I write in regard to the above planning application by Cosmeston Lakes Wake Park (CLWP).

Proposal*: A new wakeboarding sporting facility at Cosmeston Lakes Country Park. New installation of electric cable wakeboarding system equipment and a mechanical store. New installation of male changing facilities and the wake park reception. Conversion of parks store room to house female changing area located at Cosmeston visitor centre.*

I wish to object to this application on the following grounds:

**Amenity**

1.Heritage

Cosmeston became a Country Park in 1978. It is a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve (LNR). The BBC, in a report on Wales’ most popular tourist sites in 2000, stated “*Fourth place was taken by Cosmeston Lakes Country Park at Penarth which hit the 300,000 visitor mark*”. Generations of families from Penarth, the Vale, Cardiff and beyond have been drawn to the lakes at Cosmeston for their natural beauty, wildlife and to the peace and tranquility of the countryside.

2. Environment

The proposal seeks to erect a permanent structure along the west side of the eastern lake comprising two pylons with cables strung between them, along with a wakeboard course, obstacles (cable park features) and a floating bund. The visual impact would be strongly detrimental to the otherwise natural surroundings at the heart of the park, viewed by all visitors entering through the main gate. The ugly intrusion of pylons towering over the lakes, cables and shipping containers is wholly unsympathetic to the existing visual qualities at Cosmeston.

Cable wakeboarding is a watersport activity causing high levels of disturbance. Noise nuisance would spoil the currently tranquil environment. Wake turbulence would contribute to the levels of disturbance. Wildlife would likely be harmed.

A cable wakeboarding park would be harmful to the environment and wildlife of Cosmeston and would adversely affect the enjoyment of those who visit.

3. Amenity

The number of wakeboard riders is limited to a maximum of four customers an hour. During non-peak times numbers would be lower. A five month off season is required according to the Environmental Dimension Partnership Ltd (EDP) ecology report. Design and Access Statement section 2.3 states “*It is difficult to predict spectator numbers and although the proposals are unlikely to be a strong attractor of casual spectators it is reasonable to assume that parents, teachers and friends may also be in attendance*.” It follows that the numbers of visitors to Cosmeston likely to benefit from a cable wakeboard sporting facility stands to be relatively very small or in other words a tiny fraction of the current number of visitors.

The proposal to site a cable wakeboarding park at Cosmeston would be environmentally damaging, harmful to wildlife, visually intrusive and create noise and other nuisance incompatible with the heritage of the park and in direct conflict with the interests of the vast majority of the hundreds of thousands of people who visit Cosmeston each year. To give one example, visitors will wish to continue to enjoy the views and wildlife from the bridge dividing the lakes without having this experience ruined by the close proximity of a cable wakeboarding sporting facility sited just metres away.

Schoolchildren coming to Cosmeston to learn about the environment should continue to do so in a place where wild places are seen to be cherished, and not in a watersports activity centre.

The overall impact of a cable wakeboarding park at Cosmeston would be a major loss of amenity for the overwhelming majority of the park’s visitors.

4. Participation

A review of cable wakeboarding websites indicates the activity is mostly enjoyed by younger people and is unlikely to attract mass participation by those much beyond middle age. The encouragement of the Council in the engagement of young people in sporting activity is of course to be welcomed but, for reasons stated, cable wakeboarding is evidently unsuitable for a site which is a country park, local nature reserve and site of special scientific interest.

Like other visitors, young people love to visit Cosmeston for the wonderful natural resource it is. Its close proximity to major centres of population makes it an ideal place for pursuing opportunities to further engage young people with nature by harnessing their already enlightened attitudes to the environment.

5. Choice of Location

The preferred choice of Cardiff Bay Wakeboarding (CBW) for a cable wakeboard park in South Wales was in Cardiff Docks. Planning approval for a site in East Bute Dock, Cardiff was confirmed on the CBW website. However on 8th April 2016 CBW reported the land base had been sold by S.A. Brain Brewery to a local property developer. CBW stated “*There are other dock side locations potentially available and we are busy exploring these – but this does unfortunately mean that the project has been delayed further.* “

Regarding other local sites, Design and Access Statement section 3.1 details some reasons why Cardiff Bay was deemed unsuitable and also why a purpose-built lake on an open field site would be very difficult. Certain local sites with apparent potential for cable wakeboarding were not described; for example, Barry Docks with its good transport links, parking, restaurants, hotel and supermarket. Barry Docks already hosts the operations of Barry Community Water Activity Centre and in contrast to Cosmeston adverse environmental impacts of cable wakeboarding would appear to be limited.

Reasons offered by CLWP for selecting Cosmeston include “*Water surface protection from the prevailing South Westerly winds*”. It may be noted that such a feature has not appeared critical in the establishment of other cable wakeparks in the UK. To take one example, Siblyback Lake Wakeboarding Park, billed as the largest in the southwest, operates on a big, open reservoir on the edge of Bodmin Moor in Cornwall.

A process of consideration of suitable alternative sites should be undertaken where the interests of those groups targeted by cable wakeparks can be properly met.

6. Site of Wakeboard Park

For reasons described in 8-13, the area of the eastern lake most susceptible to the adverse environmental effects of a cable wakeboard park is that proposed i.e. along the western bank between the south-west corner and the north bank. In my view siting the park at the north-east end of the eastern lake would be significantly less environmentally damaging.

7. Impact of Wakeboarding Competitions

Wakeboarding competitions may place additional burdens on Cosmeston’s environment and may also cause some local disruption. With regard to whether or not such events are planned, Design and Access Statement section 2.3 states “*No formal events are planned through the proposals and* *if these should arise as the development matures then these will take place at weekends”.* Section 5.1 states the wakepark “*Will help raise the profile of the Vale of Glamorgan across the UK by adding Cosmeston Lakes onto the UK wakeboarding competition circuit”.*

**Wildlife**

8. Kingfishers

This breeding season a pair of Kingfishers is using a burrow on the eastern lake midway along its western bank. The burrow entrance is therefore located just a few metres from the site of the proposed cable wakeboarding track onto which it faces. The Kingfishers bred successfully at this site this year with a recently fledged juvenile seen in July.

The Wildlife and Countryside Act 1981 affords Kingfishers special protected status as a Schedule 1 species. The law says if any person intentionally or recklessly disturbs any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young, he shall be guilty of an offence*.*

In my opinion the disturbance from siting a cable wakeboarding facility a very short distance from the Kingfishers’ burrow would likely destroy that site as a potential breeding location for Kingfishers.

9. Obstruction of the Passage between the Eastern and Western Lakes

The eastern and western lakes at Cosmeston communicate solely via a single gap in the central causeway (the west bank of the eastern lake) which is bridged. This narrow passage serves as a corridor for the movement of aquatic birds and other wildlife between the two lakes.

Swans and other wildfowl, Coot and Moorhens regularly use this passage to travel between the lakes. Great Crested Grebes rarely fly at Cosmeston, preferring to swim under the bridge when moving from one lake to the other. I assume this route would be used by the newly-introduced Water Voles as they colonise the lakes, and there seems potential for its use by Otters.

The ecology report recommends that a floating bund be constructed around the wakeboarding park to protect the populations of Starry Stonewort. Section 5.11 states,

“*To avoid disturbance of sensitive habitats during the operational phase, particularly*

*those associated with the western lake, a floating bund should be installed along the boundary between the western and eastern lakes, the purpose of which will be to dissipate all turbulence/wave action created from wakeboarders utilising the lake, and thereby, protect populations of starry starwort, a species sensitive to high levels of water turbulence*;”

A physical obstacle in the form of a floating bund is therefore planned to be placed across the currently open access between the eastern and western lakes. During operating hours the wakeboard park would create severe disturbance, noise and wake turbulence which would serve to further obstruct the route between the two lakes. Effectively the operation of a cable wakeboarding park at Cosmeston is likely to create a barrier to the movement of wildlife between the two lakes.

10. Risk of Overhead Wire Collision for Swans, Waterfowl, Herons and Bittern

Large numbers of swans and other wildfowl visit Cosmeston and regularly fly between the eastern and western lakes. Similarly herons move around the two lakes and in winter Bittern fly across the two lakes between the eastern lake reedbed and the western lake reedbed. The position of the wakeboard park cables would lie directly across the flightpath of these birds.

The British Trust for Ornithology research report, “*The Effects of Collisions with Overhead Lines on British Birds: an Analysis of Ringing Recoveries*” measures the risk of birds hitting overhead wires. This study includes all overhead lines including power lines (with additional risk of electrocution) and so all of its findings cannot directly be translated to the risks presented by wakeboarding cables; notwithstanding this it is of interest to note “*There is a significant positive correlation between the hit wire index and the average weight of the species. This may be because manoeuvrability decreases with size. Mute Swan, Canada Goose and Grey Heron are all large aquatic birds having particularly high hit wire indices.*” (p.9) and “ … *it* *is possible Bitterns may suffer significant mortality with collisions with overhead lines*.” (p.49).

Stringing cables across the water over the eastern lake directly along the regular flightpath of these birds as proposed would appear to present a hazard to them with consequent risk of collision, injury and death. This risk would be heightened at night and during periods of poor visibility, for example in fog and mist.

11. Wildfowl Disturbance

Cosmeston provides an important refuge for resident and migratory wildfowl. The Glamorgan Bird Club (GBC) in their letter of objection to the Council dated 30th June 2017 stated Cosmeston is easily the most important site in the Vale of Glamorgan for Mute Swans, Tufted Ducks, Pochard, Mallards and Canada Geese.

Both the eastern and western lakes are used by wildfowl, the eastern lake being of particular importance during periods of stronger winds with a westerly component. In these conditions birds leave the more exposed western lake moving to the eastern lake for the relative shelter it then affords in the lee of the central causeway. According to the GBC “*At times there can be over 250 birds on the water in this sheltered area*.” Indeed, the sheltering effect of this bank is cited by CLWP as a reason for siting the wakeboard park there. Design and Access Statement section 3.3 states “*The tree and hedge growth along the western bank offers excellent shelter from the prevailing south westerly winds. The proposed cable park will run from South to North within a 50m wide section of the western bank”.*

The planned operating schedule of the cable wakeboarding park overlaps with both spring and autumn wildfowl migration. The ecology report section 5.11 states

*“Operation of the Wake Park will be from late March to the end of October to avoid*

*impacts to wintering wildfowl;”.* However GBC survey data “*shows that peak counts for Mute Swan occur in March, April and September, for Canada Geese in September and for Mallard in August*”. I concur with GBC in considering that the period in which migrant wildfowl would be adversely impacted by the activities of the wakeboard park extends from mid-August to mid-April. Furthermore resident waterfowl would be adversely affected throughout all months of operation.

The ecology report section 5.31 states “*Potential exclusion and disturbance of waterfowl utilising the lake during day lights hours are similarly anticipated during operation of the wakeboarding cable system. The area from which waterfowl will be excluded comprises approximately 0.48 hectares of open water habitats. Given the availability of additional habitats of similar or greater quality to waterfowl within the immediate area, however, effects associated with temporary and long-term exclusion are not considered significant.”* In my view the area of open water disturbance to waterfowl created by the operation of a cable wakeboarding park would extend a far greater distance across the eastern lake than that area solely enclosed within the floating bund perimeter.

Evidently the disturbance created by a cable wakeboarding facility may render much of the eastern lake unsuitable for the waterfowl and other wildlife which currently peacefully exists there and would likely drive many birds away from this traditionally used site.

12. Bankside Vegetation, Trees and Wildflowers

The construction and operation of the cable wakeboarding park will have an adverse impact on wildlife using the bankside vegetation and trees in the vicinity of the pylons and wakeboard course. For example, the tangle of vegetation around the bank next to the site of the planned north pylon is a favoured hunting spot for Kingfishers.

The ground around the site of the proposed north pylon lies within a wildflower meadow containing Bee Orchids and Common Spotted Orchids.

13. Water Voles and Otters

Water Voles were re-introduced to Cosmeston in June 2017. National Resources Wales (NRW) in a letter to the Council dated 13th June 2017 stated “*The* *ecological assessment does not take this into account*.”

Otters are historically recorded as visitors to Cosmeston although sightings during the day are rare.

The levels of disturbance created by the operation of a cable wakeboarding park in the middle of apparently suitable habitat can only have an adverse effect on these shy creatures as well as further limiting the hopes that visitors to the park have of observing them.

14. Starry Stonewort

The park is designated an SSSI due to the presence of the aquatic plant Starry Stonewort. NRW in their letter to the Council dated 13th June 2017 stated “*the proposed development has the potential to damage these plants*”.

15. View of Natural Resources Wales

Design and Access statement section 5.1 summary states “*The benefits of siting a Wakeboarding Park at Cosmeston Lakes include –* “ and below this list a number of bullet points which include “*We have already secured the support of key organisations for a wakeboarding park in South Wales – Natural Resources Wales …* “

The letter from NRW to the Council dated 13th June 2017 regarding this planning application states “*We have significant concerns with the proposed development as submitted*.” The letter goes on to further document specific concerns in regard to Starry Stonewort and Water Voles as stated above.

**Economy**

16. Local Economy

Given that the capacity for wakeboard riders is limited to a maximum of four per hour, that the facility may likely operate at maximum capacity only during the summer peak, that a five month close season has been required in the ecology report and that the proposals have been stated by CWLP to be unlikely to be a strong attractor of casual spectators, it perhaps does not appear very likely this venture would provide other than a modest contribution to the tourist economy of the Vale. Furthermore any benefits to the local economy from wakeboard riders are likely to be realized in part in Cardiff given the Cardiff-Vale boundary lies 3 miles away from Cosmeston by road.

The consideration of the economic benefits accruing from participants attending the wakeboard park need to be balanced by factoring any adverse effects the operations of a commercial wakeboard park may have on the hitherto peaceful enjoyment of the lakes by the overwhelming majority of Cosmeston’s visitors. This disadvantaging may have a deterrent effect on visitor numbers.

In many people’s opinion Cosmeston represents the jewel in the crown of the Vale’s estate. The sensitive management of the lakes by the Council to date, only allowing activities deliberately chosen to have low environmental impact, has drawn visitors from near and far. The wildlife, beautiful natural surroundings and peace and tranquility of the lakes attract literally thousands of visitors on a sunny summer’s day. In my view the hard-won reputation of the Council should not be placed at risk by harming the natural heritage of Cosmeston for future generations and attracting public disaffection.

17. Business Venture Risk

As any business venture attracts risk, provision should be made for any consequences if the operation of a commercial wakeboarding facility at Cosmeston should fail. Consideration should be given to the requirement for sufficient funds to be placed in an account for the purpose of ensuring all costs are covered arising from the dismantling of the facility and the restoration of the environment to a state matching as closely as possible the undamaged natural state existing prior to the construction of the facility.

Funds should be provided for the regular ecological surveying of the environmental impacts of the cable wake park and also for monitoring the visitor and economic impacts.

**Mitigation**

18. Mitigation

Should the proposal for a cable wakeboarding park at Cosmeston proceed, the loss of amenity suffered by the park’s visitors and the adverse effects on the park’s environment and wildlife may in my view be mitigated, albeit in small part only, by:

* Siting the wakeboard park along the north-east side of the eastern lake.
* Restricting operations to the period mid-April – mid-August.
* Removing all wakeboard cables and all surface apparatus - course obstacles, floating bunds and any other - during the close season.

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(full address supplied)