



Our Ref: CSC1010
Date: 17th February 2026

CarneySweeney
Brunel House
2 Fitzalan Road
Cardiff
CF24 0EB

kate.gapper@carneysweeney.co.uk

Vale of Glamorgan Council
Planning Enquires
Dock Office
Subway Road
Barry
CF63 4RT

Planning Portal Ref: PP-14636776

Dear Sir/Madam,

Application by Welsh Ministers for the Demolition of Buildings/Structures and Installation of a 132kV Electricity Substation on Land at Bro Tathan, St. Athan, Vale of Glamorgan

CarneySweeney are instructed by the Welsh Ministers (the Applicant) to submit the enclosed planning application for the demolition of existing buildings and structures and the installation of a 132kV electricity substation on land at Bro Tathan, St. Athan.

This Planning Supporting Letter provides a summary of the site description, the proposed development and planning policies of relevance to the site and proposal. The following documents are submitted in support of this application:

- Completed Application Form
- Planning Supporting Letter (this document)
- Package of planning drawings comprising the following:
 - 50101-BUR-BT-XX-D-C-10100-RevP3.0: Site Location Plan
 - 50101-BUR-BT-XX-D-C-10101-RevP2.0: HRDF Interface Plan
 - 50101-BUR-BT-XX-D-C-10103-RevP3.0: Construction Compound
 - 50101-BUR-BT-XX-D-C-10120-RevP2.0: Substation Plan and Elevations
 - 50101-BUR-BT-XX-D-C-10200-RevP3.0: Demolition and Tree Loss Plan
 - 50101-BUR-BT-XX-D-C-10500-RevP3.0: Drainage Layout
 - 50101-BUR-BT-XX-D-C-10501-RevP4.0: Landscaping & SuDS General Arrangement
- Design and Access Statement
- Green Infrastructure Statement
- Heneb Report 2024/033 'Bro Tathan (former RAF St Athan, East Camp) Vale of Glamorgan Parts A and B Historic Building Recording' (dated 11/03/2025)
- Heneb Report 2025/045 'Bro Tathan (former RAF St Athan, East Camp) Vale of Glamorgan Historic Building Recording - Barrack Block Addendum' (dated 26/11/2025)

The application site measures 30,904sqm, giving rise to a £9,261 planning application fee. This will be paid under separate cover.

Site Description

Bro Tathan is a Welsh Government owned strategic business park located in the heart of the Vale of Glamorgan, approximately 8 miles west of Barry, 12 miles south-east of Bridgend, 4 miles west of Cardiff Airport and 14 miles south of Junction 33 of the M4.

The site lies within the Cardiff Airport and St Athan Enterprise Zone, where Policy MG10 of the adopted Vale of Glamorgan Local Development Plan (LDP) applies. This policy context is discussed in more detail below.



Bro Tathan provides around 150,000 sq.m of employment floorspace and benefits from its own fully operational 1.8km runway which is licensed, by the Civil Aviation Authority and with full airside support making a strategic location for various business activities. It accommodates several major occupiers, including Aston Martin Lagonda, eCube Solutions, Caerdav and Bristow Helicopters.

The wider Bro Tathan area is divided into five zones:

- **Y Gogledd (North):** Land at Picketston to the north, with access from Ffordd Bro Tathan.
- **Y Gorllewin (West):** Land north of the runway and east of the army-occupied West Camp, including the Aston Martin Lagonda (AML) manufacturing facility, with direct runway access.
- **Y Dwyrain (East):** Approximately 52 hectares of land north of the runway, extending from the eastern boundary of the AML factory to the site boundary at Cowbridge Road. This zone benefits from its own independent access and access to the runway.
- **Y De (South):** Land south of the runway at Batslays, West Orchard and Beggar's Pound.
- **Y Porth:** Land south of Ffordd Bro Tathan, north of Caerdav Ltd and west of the roundabout serving AML; as well as land to the west of Caerdav Ltd, south of Scott Way.

The Application Site comprises land within **Y Dwyrain (East)**. The extent of the site is shown on the enclosed Site Location Plan (Drawing No. 50101-BUR-BT-XX-D-C-10100).

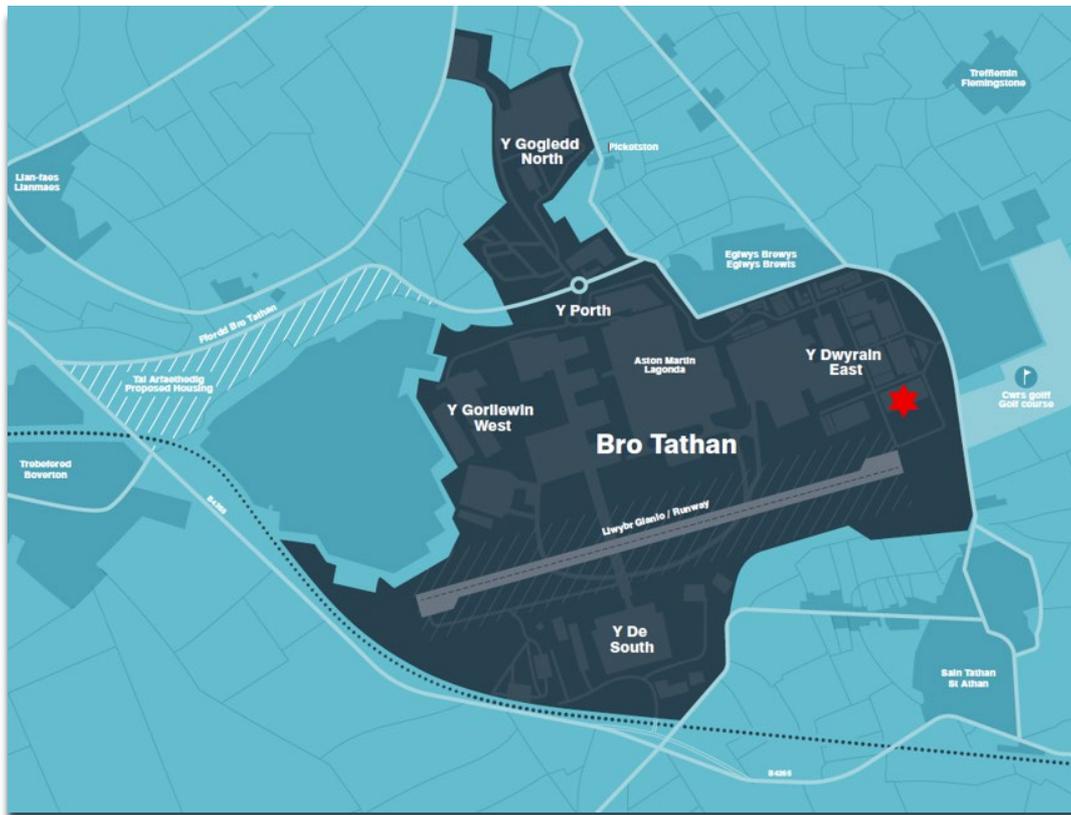


Figure 1: Application Site (shown by red star)

The application site extends to 30,904 sqm of brownfield (i.e. previously developed) land and comprises rough grass, scattered trees, areas of hardstanding, car parking, former sports pitches, internal roads and tracks, and a range of buildings and structures associated with the former Royal Air Force (RAF) and MoD operations.

A recorded 33 trees, ranging in their condition and quality, are distributed across the site. Of these, 8 are moderate quality and 25 are low quality.



The site is generally flat. No public rights of way travel through the site and it is presently inaccessible to the public. The wider site is bounded with wire mesh fencing for security purposes.

In terms of flood risk, the site lies in Flood Zone 1 according to the TAN 15 Flood Map. There are no other known statutory or non-statutory designations on or immediately neighbouring the site.

Relevant Planning History

The wider Bro Tathan site has an extensive planning history; however, the following applications are specifically relevant to the site proposed for the substation.

The demolition of certain structures on Bro Tathan East (referred to as 'Phase 1 Demolition Works') was approved in 2019 under planning reference 2019/00819/PND. In November 2024, planning permission was granted for the demolition of approximately 70 separately numbered structures (referred to as 'Phase 2 Demolition Works') under reference 2023/00949/FUL¹. This permission included the demolition of buildings and foundations etc. and the erection of two bat houses and associated landscaping. While approval 2023/00949/FUL included the demolition of buildings on the site of the proposed substation, since the demolition has not yet commenced, elements of these approved works also form part of this planning application for the substation.

In December 2024, an outline planning application was submitted for "the redevelopment of land formerly comprising 'east camp' for the demolition of existing structures and the erection of up to 285,000sqm of employment and air-side operational facilities (within Class B1b and/or B1c and/or B2) and associated earthworks, access, drainage, servicing, utilities connections/infrastructure and landscaping" (Ref: 2024/01216/OUT). This application is currently under consideration by the LPA.

Application Proposals

The proposal seeks permission for the demolition of buildings and structures including the removal of hazardous materials, foundations and associated utility disconnections and the installation of a 132kV electricity substation. The substation is required to transform high-voltage electricity transmitted from Aberthaw Power Station into lower-voltage power suitable for local distribution across the Bro Tathan site.

This infrastructure is essential to provide a reliable and adequate electricity supply to a range of existing and proposed developments within the site, enabling both current operations and future growth. Provision of a robust power network will support a wider variety and scale of commercial and industrial uses, helping to attract new businesses, diversify industry, and create a broader range of employment opportunities within the area, in line with the existing and emerging LDP allocation.

The substation compound will include the following key elements:

- Two switchgear rooms (33kV and 11kV) each measuring 24.3m x 6.4m, with a height of 7.5m;
- One 132kV control room measuring 28.12m x 11.5m, with a height of 4.2m;
- Four ground-level transformers, each approximately 3.8m in height; and
- Above-ground cable connections linking all components, 6.5m in height.

The compound will be enclosed by a 2.4m high security fence and will incorporate a 4–5m wide internal perimeter roadway for operational access. To the south of the compound, an attenuation basin will be formed at close to existing ground levels, with a maximum depth of 1m, providing sustainable drainage capacity.

The land surrounding the attenuation basin, and to the east of the substation compound, will be designated as landscaping area. The landscaping and attenuation basin will provide biodiversity and amenity gains in the area including a programme of replacement tree planting.

¹ [Decision Notice_202300949FUL\(3\).pdf](#)



Overview of Planning Policy Context

Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan relevant to the Site comprises Future Wales – the National Plan 2040 (published February 2021) and the Vale of Glamorgan Local Development Plan 2011-2026, which was formally adopted in June 2017. Material considerations include national policy in the form of Planning Policy Wales (PPW). Those policies that are considered to be relevant to the proposed development in the Development Plan and PPW are summarised below.

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 (hereinafter referred to as 'The National Plan') was published in February 2021 and sets out the national development framework for Wales outlining the direction for development to 2040. The National Plan sets out the strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

Within the National Plan, the Cardiff Airport and Bro Tathan Enterprise Zone is noted as offering opportunities for investment in the site and surrounding areas. The National Plan goes on to state that "...The Enterprise Zone offers a wide range of development sites and business accommodation, providing opportunities for the development of bespoke facilities or investment in existing accommodation."

Vale of Glamorgan Local Development Plan

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 was adopted in 2017, setting out the vision, objectives and policies for the plan period up to 2026.

The Site forms part of the wider St Athan Cardiff Airport Enterprise Zone which is allocated for employment uses under **Policy SP2** Strategic Sites and **Policy MG9** Managing Growth. Paragraph 5.33 of the LDP states "the sites identified in Policy SP2 (Strategic Sites) are those that are considered to be major elements contributing to the implementation of the LDP Strategy as set out in the Plan i.e. the promotion of development and regeneration opportunities within the specific areas identified within the strategy."

Policy MG10 sets out the policy criteria for the Cardiff Airport and St Athan Enterprise Zone allocation, stating that:

"Land is allocated adjacent to Cardiff Airport and Port Road, Rhose (77 ha) and at the aerospace business park St Athan (305ha) for the development of 382 hectares of strategic employment land (class B1, B2 and B8) forming part of the St Athan – Cardiff Airport Enterprise Zone. The development of the enterprise zone will be guided by a masterplan to include the following elements..."

- *A business park for aviation support services at Picketston (11.79 ha);*
- *An aerospace business park north and south of the runway at St Athan;*
- *Provision of sustainable transport infrastructure;"*

Policy SP10 (Built and Natural Environment) outlines that development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan including *inter alia*, important archaeological and geological features (Part 6 of Policy SP10).



Policy MD2 deals with the design of new development, setting out specific criteria for assessing design matters. Due to the nature of the proposed development, the criteria within Policy MD2 are not wholly relevant however the proposed development does not conflict with the provisions of Policy MD2 in that the external appearance of the proposed substation would be appropriate to the surrounding airport infrastructure context.

Policy MD7 Environmental Protection requires development proposals to demonstrate that they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment. The proposed substation is not considered to present any issues in this regard.

Policy MD8 Historic Environment, requires development proposals to protect the qualities of the built and historic environment of the Vale of Glamorgan, which includes sites of archaeological interest. For such sites, the policy requires development proposals to preserve or enhance archaeological remains and where appropriate, their settings.

Planning Policy Wales

PPW notes at paragraph 5.3.18 that “Planning authorities should recognise the strategic and local importance of airports and their potential as centres of economic activity.” PPW goes on to note at Paragraph 5.4.4 that “Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.”

Key Considerations

This section considers the key planning matters arising from the proposed development drawing on the planning policy context and other material considerations. The key planning considerations deemed relevant to the determination of this proposal are as follows:

- Principle of Development
- Ecology and Biodiversity
- Arboriculture
- Archaeology
- Heritage
- Impact on the MOD’s High Resolution Direction Finder (HRDF) Equipment

Principle of Development

The application site forms part of the Bro Tathan strategic business park located within an Enterprise Zone where employment development is supported at both local and national levels through the Vale of Glamorgan LDP and the National Plan. As outlined above, the proposed substation is essential to delivering a resilient and future-proof power network capable of supporting a broader range and scale of commercial and industrial uses. This infrastructure will play a key role in enabling the Welsh Government to progress to the next phase of Bro Tathan, which aims to create a pioneering business destination offering diverse development and occupational opportunities.

It is also relevant that the principle of demolishing the existing airfield buildings to facilitate future employment use has already been established through the Phase 2 Demolition Works consent. In granting that approval, the Planning Officer’s delegated report acknowledged the site’s status as a strategic employment allocation within the LDP, confirming that such enabling works are acceptable in principle and consistent with employment-related policies intended to safeguard the site for these purposes.

The proposed substation will provide critical support to existing and proposed occupiers and the wider employment allocation and aligns with Policy MG10 of the LDP as well as the strategic ambitions set out in the National Plan for this Enterprise Zone.

Ecology and Biodiversity



The application for the Phase 2 Demolition Works, which includes the land now proposed for the substation, was supported by an Ecological Impact Assessment (Arup, Demolition Ecological Impact Assessment, 6 July 2023)² assessing the likely effects of demolition on ecological receptors. Additional protected species surveys were undertaken for barn owl, nesting and breeding birds, bats, dormouse and reptiles, ensuring that all relevant ecological interests of that wider site were fully considered.

The 2024 outline application, which comprises a much wider site but includes the substation site, is also accompanied by an Environmental Statement (Bro Tathan Environmental Statement, Volume1: Main Text, December 2024)³, which includes a dedicated Ecology chapter (chapter 9) informed by an extensive programme of desk-based studies and detailed habitat and species-specific surveys.

Survey work undertaken to date confirms that the substation site comprises semi-improved neutral grassland, with potential ecological effects relating primarily to habitat disturbance and impacts on habitats of value to protected or notable species, including roosting bats, foraging and commuting bats, and breeding birds.

A survey titled 'Survey for Bats (Buildings)' (David Clements Ecology Ltd, December 2022)⁴ identified that five buildings within the application site (436, 437, 440, 441 and 442) are confirmed as containing bat roosts and one building (439) is highly likely to be used by roosting bats.

A tree survey titled 'Tree Assessment for Bats' (David Clements Ecology Ltd, June 2023)⁵ has confirmed that one of the trees within the application site which is proposed to be lost (Tree T630) has low potential to support roosting bats and therefore prior to any works commencing checks will need to be undertaken to confirm the presence or likely absence of roosting bats in line with best practice guidance.

A range of embedded mitigation measures has already been agreed through the Phase 2 Demolition Works consent. These include construction best practice measures set out in the Demolition Environmental Management Plan (DEMP), new planting to maintain habitat connectivity, the installation of bat boxes on mature trees within the Applicant's wider land holding, and the provision of two new bat houses. Given the impacts of this application overlap with the impacts of the Phase 2 Demolition Works, it is right and proper that the mitigation measures proposed by this application equally overlap with the mitigation measures proposed by the Phase 2 Demolition Works. Accordingly, in the event that demolition proceeds pursuant to the Phase 2 Demolition Works consent, then mitigation and compensation will be provided pursuant to that consent. However, if demolition of the nine numbered buildings proceed pursuant to this substation application, then a proportionate amount of the mitigation and compensation will equally be provided pursuant to this approval (comprising the erection of one bat house (which of the two approved bat houses can be determined in consultation with NRW and secured by a Grampian condition, given that one potential bat house is located outside of the red line area) and associated landscaping as well as installation of bird boxes and refugia).

A future Construction Environmental Management Plan (CEMP) will also be prepared to manage ecological risks during construction, including species-specific method statements. All necessary ecological licences will be obtained and complied with.

The mitigation strategy follows the stepwise approach set out in Planning Policy Wales (PPW), ensuring that adverse effects are first avoided, then minimised, mitigated, and finally compensated where required (see accompanying Green Infrastructure Statement). These measures ensure that no significant ecological effects are anticipated during demolition, construction or operation.

² [Demolition EclA July 2023_Redacted\(1\).pdf](#)

³ [ES Vol 1 Main Text\(1\).pdf](#)

⁴ [ES Appendix 9.9 Survey for bats \(buildings\).pdf](#)

⁵ [ES Appendix 9.8 Tree Assessment for Bats.pdf](#)



In line with the stepwise approach, enhancement measures are also proposed to deliver a net benefit for biodiversity (NBB) in accordance with PPW and The National Plan Policy 9. These include planting a diverse mix of replacement native trees and wildflowers as part of the proposed landscaping and installation of bird boxes and refugia.

Arboriculture

An Arboricultural Impact Assessment (AIA)⁶ was undertaken by TR33 Environments in support of the 2024 outline application (Ref: 2024/01216/OUT). The AIA confirms that the site is not subject to any Tree Preservation Orders (TPOs) and does not lie within a Conservation Area. The assessment also identifies that there are no recorded ancient or veteran trees within the site.

The AIA includes an assessment of the 33 trees that require removal to facilitate the proposed substation. Survey results are provided in Appendix D of the AIA and reproduced in Table 1 below.

Table 1: Tree Survey Schedule

Table with 9 columns: Tree Ref., Species, Height, Crown Spread, Life Stage, Condition, ERC, Category, Notes. It lists 33 individual trees with their respective details.

⁶ [21585 Bro Tathan Arboricultural Impact Assessment.pdf](#)



616	Acer platanoides (Norway maple)	13.0	5.0	Mature	Good/Fair	20+	B/2	-
622	Acer platanoides (Norway maple)	16.0	6.0	Mature	Good/Fair	20+	B/2	-
630	Prunus avium (wild cherry)	7.0	5.0	Mature	Fair	10+	C/2	-
632	Tilia sp. (lime)	12.0	4.0	Mature	Good/ Fair	20+	B/2	Pruned to clear adj. building
634	Tilia sp. (lime)	12.0	5.0	Mature	Good/ Fair	20+	B/2	Pruned to clear adj. building
636	Tilia sp. (lime)	14.0	5.0	Mature	Good/ Fair	20+	B/2	Pruned to clear adj. building
637	Tilia sp. (lime)	14.0	5.0	Mature	Good/ Fair	20+	B/2	Pruned to clear adj. building

Within the substation application boundary, the survey identifies 8 moderate-quality trees (Category B) and 25 low-quality trees (Category C). Overall, there will be no loss of high-quality arboricultural features on site, and the removal of these trees is not expected to result in any significant adverse landscape or visual effects. Appropriate mitigation will be delivered through a programme of replacement tree planting at a ratio of 3:1 within the Applicant’s wider ownership, such that it ‘overlaps’ with tree planting required to provide habitat connectivity required under planning conditions attached to the Phase 2 Demolition Works. This ‘off-site’ tree planting can be secured by a Grampian condition.

Archaeology

The Bro Tathan site has been subject to extensive archaeological investigation over many years. The archaeological and historical background of the area was comprehensively assessed in a desk-based assessment (DBA) undertaken by Tetra Tech (2022), alongside several additional DBAs focusing on specific parts of Bro Tathan. A number of targeted geophysical surveys have also been completed across the wider site, including at Bro Tathan East (2022) together with archaeological evaluation through trial trenching undertaken in 2023.

Consent for the Phase 2 Demolition Works required the approval of a Written Scheme of Historic Environment Mitigation (WSHEM)⁷ for demolition work. The WSHEM provides for an archaeological watching brief during demolition, supported by detailed contingency arrangements. These include ensuring sufficient time and resources for the proper investigation and recording of any archaeological features or finds uncovered, as well as for documenting any structural details revealed during demolition.

The WSHEM also makes provision for any necessary sampling, post-excavation recording and assessment, reporting, and the potential publication of results. The scheme has been approved by the Local Planning Authority (Ref: 2023/00949/2/CD). It is considered that the following condition would appropriately secure compliance:

To ensure that archaeological operations are undertaken to an acceptable standard and that legitimate archaeological interest in the site is satisfied, all demolition works shall be carried out in accordance with the requirements and standards set out in the document titled ‘Written Scheme of Historic Environment Mitigation for an Archaeological Watching Brief’ dated December 2024 (Report No. 2024.018).

Given the extensive archaeological work already undertaken, which provides a robust and comprehensive understanding of the site and its archaeological potential and noting that any residual risk will be appropriately mitigated through compliance with the approved archaeological watching brief, it is reasonable to conclude that the proposed development is unlikely to result in any adverse archaeological impact. The proposal therefore accords with Policies MD8 and SP10.

⁷ [BroTathanEast WSI.pdf](#)



Heritage

A baseline understanding of the site's heritage context is established within the aforementioned DBA.

Additional mitigation has also been undertaken in the form of Historic Building Recording of a number of existing non-designated buildings that are proposed to be demolished. These include some of those needed to be demolished to accommodate the substation (buildings numbered 439, 440, 441 and 442). The building surveys were carried out from April 2024 to September 2025 and the findings are set out within the following reports (which we submitted to the LPA on 12th December 2025):

- Heneb Report 2024/033 'Bro Tathan (former RAF St Athan, East Camp) Vale of Glamorgan Parts A and B Historic Building Recording' (dated 11/03/2025)
- Heneb Report 2025/045 'Bro Tathan (former RAF St Athan, East Camp) Vale of Glamorgan Historic Building Recording - Barrack Block Addendum' (dated 26/11/2025)

It is considered that the Phase 2 Demolition Works includes appropriate mitigation and enhancement measures in order to protect the historic environment as far as possible and does not conflict with LDP Policy SP10 or MD8.

Impact on the MOD's High Resolution Direction Finder (HRDF) Equipment

Consultation with the Ministry of Defence on the Phase 2 Demolition Works application indicates that concerns may be raised regarding its High-Resolution Direction Finder equipment located to the east of the site and the implications of the proposed demolition and development on its operation.

Substation Compound

Mobile plant will be used to demolish the existing buildings, process arisings, and construct the substation. These items of plant will typically reach heights of up to approximately 4 m, although long-reach excavators may need to extend to around 20 m to achieve the required working reach. Such extensions will be temporary and intermittent, as the machinery will move around the site throughout the works. They will not remain in a fixed elevated position for prolonged periods, unlike, for example, a tower crane used in high-rise construction. In practical terms, these machines are large "JCB-type" vehicles operating on caterpillar tracks.

The substation compound will comprise a fenced area as shown on Drawing No. 50101-BUR-BT-XX-D-C-10120. The perimeter fencing will be 2.4 m high, and the tallest element within the compound will be approximately 7.5 m high.

The safeguarding "surface" associated with the HRDF consists of a 120 m radius at ground level, beyond which it rises at a 1:25 gradient. The HRDF is located at 43 m AOD, while the proposed substation compound is situated 380 m away at a ground level of 44.75m AOD. Applying the safeguarding calculation:

$$\left(\frac{380 - 120}{25} \right) - (44.75 - 43) = 10.4 - 1.75 = 8.65m$$

This demonstrates that a structure up to 8.65m in height could be accommodated at the substation location without breaching the HRDF safeguarding surface. Accordingly, the proposed substation compound and all associated facilities (buildings and plant) will remain well below this threshold.



Construction Compound

The construction compound will comprise a fenced area as shown on Drawing No. 50101-BUR-BT-XX-D-C-10103. The perimeter fencing will be 2.4 m high, and the tallest element within the compound will be approximately 7 m high, consistent with the recent utilities and demolition applications (Refs: 2023/010762/FUL and 2023/00949/FUL).

The HRDF is located at 43 m AOD, while the proposed construction compound is situated 480 m away at a ground level of 44.75m AOD. Applying the safeguarding calculation:

$$\left(\frac{480 - 120}{25} \right) - (44.75 - 43) = 10.4 - 1.775 = 12.65m$$

This demonstrates that a structure up to 12.65m in height could be accommodated at the construction compound location without breaching the HRDF safeguarding surface. Accordingly, the proposed compound and all associated facilities (including welfare units) will remain well below this threshold.

Conclusion

We trust that the above and enclosed information is sufficient to allow a swift and favourable determination of the proposal.

We trust that the application is in order and that it can be processed accordingly. Please do not hesitate to contact us should you wish to discuss the above or require any additional information.

Yours faithfully,

Kate Gapper
Director
CarneySweeney Ltd