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PLANNING AND REGENERATION

Green Infrastructure Statement

Client Name:	Welsh Ministers
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Contents

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SECTION 1

Introduction

1.0 Introduction

1.1 This Green Infrastructure Statement has been prepared by CarneySweeney on behalf of Welsh Ministers in support of a 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.

Purpose, Legislation and Planning Policy

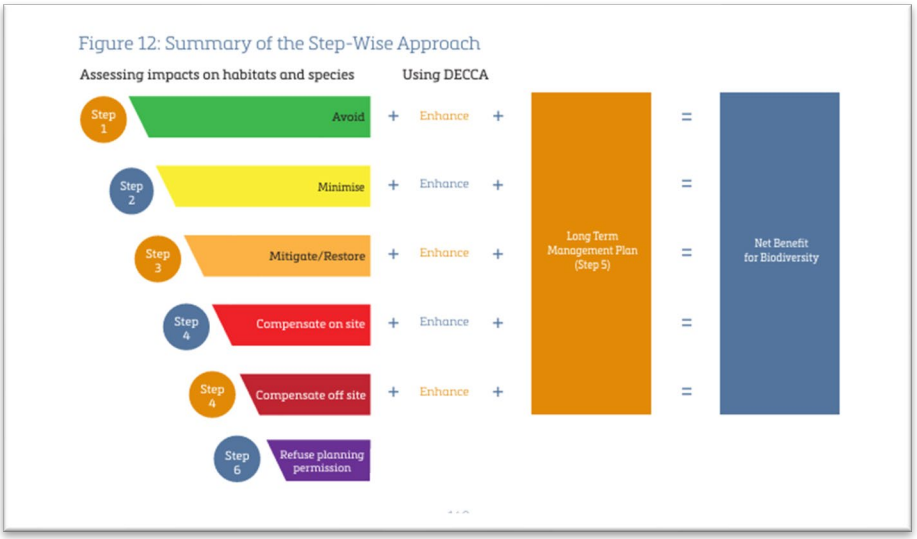
1.2 The purpose of this statement is to provide an overview of the existing habitats, tree stock and GI on the site and to detial potential development impacts (in absence of mitigation) and proposed GI enhancements.

1.3 The definition of Green Infrastructure in Chapter 6 of Planning Policy Wales (12 February 2024) is as follows:

> *'Green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks'.*

1.4 The Environment (Wales) Act 2016 provides a context for the delivery of multi-functional green infrastructure. Its provision can make a significant contribution to the sustainable management of natural resources. Green infrastructure is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural as well as environmental resilience and respond to challenges presented by the climate emergency.

1.5 A Step-Wise Approach is required to be demonstrated in the Green Infrastructure Statement to assess impacts on habitats and species, as set out in Figure 12 of PPW12 and shown overleaf. These steps will indicate how Net-Benefit-for-Biodiversity is achieved.



1.6 The statement has been produced in accordance with requirements outlined in Chapter 6 of Planning Policy Wales 12 (PPW 12), which can be summarised as follows:

- **Green Infrastructure (GI):** stronger emphasis on taking a proactive approach to GI, covering cross boundary considerations, with the submission of a proportionate GI statement with planning applications.
- **Net Benefit for Biodiversity and the Step-wise Approach:** further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and the need to consider enhancement and long-term management at each step. The use of the GI statement as a means of demonstrating the stepwise approach is made explicit.
- **Trees and Woodlands:** closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place. It also specifies that where trees are lost to facilitate development *"Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must preferably be onsite, or immediately adjacent to the site, and at a minimum of at least 3 trees of a similar type and compensatory size plated for every 1 lost".*

1.7 As stated with para 6.2.12 of PPW 12, a green infrastructure statement should be submitted with all planning applications. These are to be *"proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. The green infrastructure statement will be an effective way of demonstrating multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied".*

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SECTION 2

Application Proposals and Planning History

2.0 Application Proposals

2.1 The proposal seeks permission for the demolition of buildings and structures and the installation of a 132kV electricity substation.

2.2 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.

2.3 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.

2.4 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. See Figure 1 below.

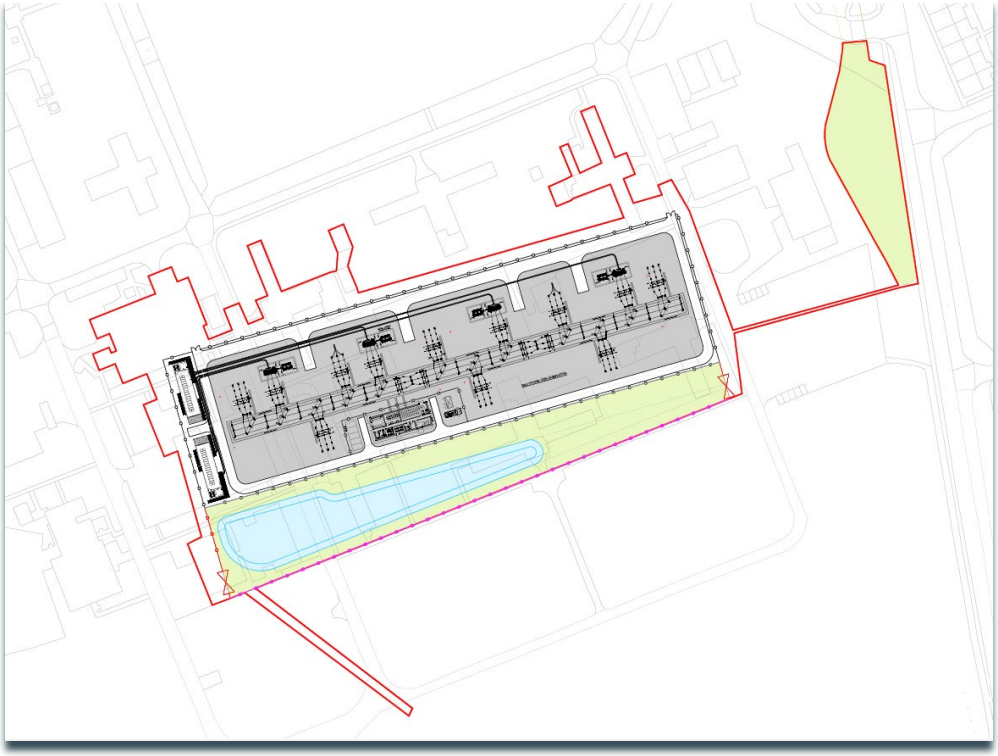

Figure 1: Proposed Substation Layout

Relevant Planning History

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

2.6 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/FUL. 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.

2.7 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.

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SECTION 3

Site Description, Baseline and Development Impacts

3.0 Site Description, Baseline and Mitigation

Site Description

3.1 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 and 4 miles west of Cardiff Airport.

3.2 The business park lies within the Cardiff Airport and St Athan Enterprise Zone and provides around 150,000 sq.m of employment floorspace. It 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. Major occupiers, including Aston Martin Lagonda, eCube Solutions, Caerdav and Bristow Helicopters.

3.3 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.

3.4 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 2: Application Site (shown by red star)

Site Baseline

3.5 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. See Figure 3 below.

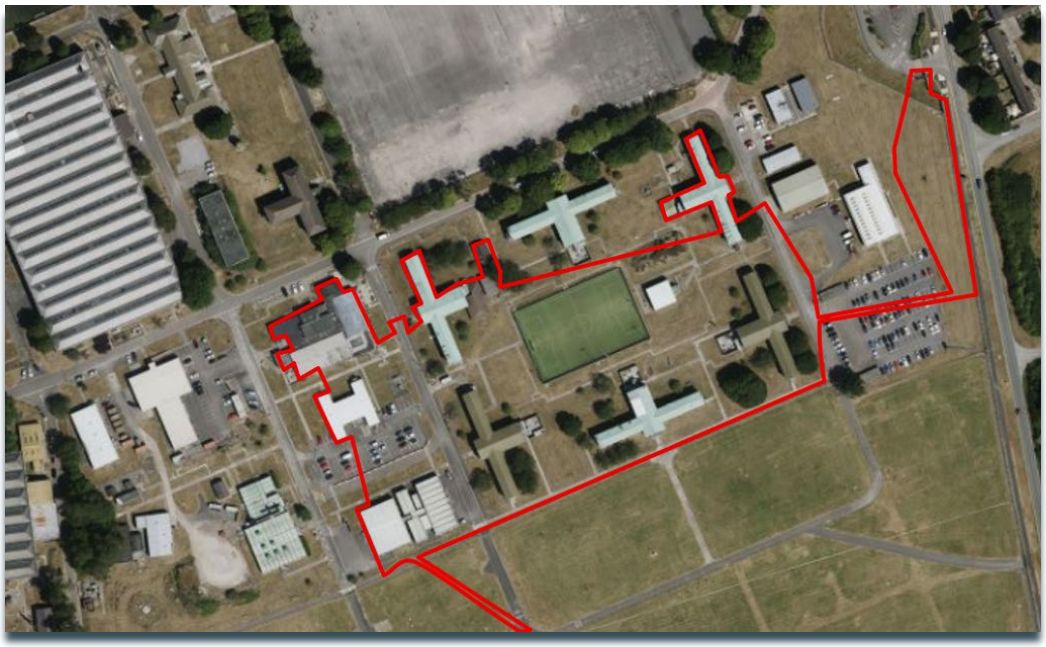

Figure 3: Aerial Image of Application Site

3.6 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.

3.7 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.

Ecology and Biodiversity

3.8 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.

3.9 A survey titled 'Survey for Bats (Buildings)' (David Clements Ecology Ltd, December 2022) 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.

3.10 A tree survey titled 'Tree Assessment for Bats' (David Clements Ecology Ltd, June 2023) 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.

Arboriculture

3.11 The site is not subject to any Tree Preservation Orders (TPOs), does not lie within a Conservation Area and there are no recorded ancient or veteran trees within the site.

3.12 Within the substation application boundary, there are 8 moderate-quality trees (Category B) and 25 low-quality trees (Category C).

3.13 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.

Mitigation

3.14 A range of embedded mitigation measures has been agreed for 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.

3.15 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 approval, 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).

3.16 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.

Net Benefit for Biodiversity and the Step-wise Approach

3.17 The Proposed Development seeks to follow the Stepwise Approach as detailed within Chapter 6 of PPW12, by implementing the following:

1. **Avoid:** The proposed development footprint lies within an area of previously developed land. Whilst some tree loss is unavoidable, overall there will be no loss of high-quality arboricultural features on site, and the removal of trees is not expected to result in any significant adverse landscape or visual effects.

2. **Minimise:** By restricting habitat clearance to the absolute minimum required for demolition, construction and safe operation. Furthermore, impacts are minimised by undertaking vegetation removal in stages and outside sensitive periods, such as bird nesting and animal hibernation seasons. Also tree checks will be undertaken prior to removal to confirm the presence or likely absence of roosting bats in line with best practice guidance.

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

4. **Compensation:** Appropriate compensation 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 to maintain habitat connectivity together with the installation of bat boxes on mature trees and the provision of one new bat house.

3.18 The proposed ecological enhancements fit with the DECCA (Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience) Framework by:

1. *Increasing diversity within the local ecosystem*
2. *Increasing the extent/scale of ecosystems*
3. *Improving the condition of the ecosystem*
4. *Improving connections within and between ecosystems*
5. *Improving ecosystem resilience and adaptability to future pressures*

Conclusion

3.19 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. These measures ensure that no significant ecological effects are anticipated during demolition, construction or operation.

3.20 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, a bat house and refugia.