To: Planning and Environment Decisions Wales (PEDW)
Date: 27th May 2025

Subject: CAS-02641-G8G7M5

Objection to Legal & General's Planning Application – Model Farm, Rhoose

To Whom it may concern,

We are writing to submit a formal objection to Legal & General's application for development at Model Farm, Rhoose. This proposal is fundamentally flawed across multiple dimensions — environmental, social, and economic — and I urge PEDW to reject it in full.

1. Ecology and Biodiversity

Recent ecological surveys have revealed that Model Farm supports a far richer and more sensitive habitat than previously understood. The site is home to protected and endangered species including bats, [redacted] hares, nesting birds, and supports ancient woodland, wildflower-rich meadows, and mature hedgerows.

The mitigation measures proposed by Legal & General are inadequate. Attempting to relocate complex, interdependent ecosystems is scientifically and practically unviable. This development would lead to irreversible biodiversity loss, contrary to the principles of the Environment (Wales) Act 2016.

Importantly, the Welsh Government already promotes sustainable land use through several incentive schemes. The Sustainable Farming Scheme (SFS) supports biodiversity enhancements by paying farmers to plant wildflowers, maintain field margins, and protect hedgerows. The Growing for the Environment scheme and Habitat Wales Scheme also offer financial support to farmers for managing land for conservation purposes. Legal & General's claim that Model Farm must be developed for economic reasons ignores the viable alternative: sustainable stewardship of this land in alignment with Welsh Government policy.

2. Viability and Economic Case

The proposed development remains financially unviable. There is no clear or enforceable guarantee of job creation or long-term economic benefit. Other employment sites across the Vale — with better transport infrastructure and planning permissions already in place — remain unused. There is no demonstrable need to sacrifice greenfield land at Model Farm for a speculative business park.

3. Transport and Infrastructure

Legal & General's Environmental Statement fails to acknowledge the significant cumulative pressure already placed on local transport infrastructure:

- Major housing allocations via the Local Development Plan (LDP)
- The new college at Cardiff Airport
- Additional housing proposed at Weycock Cross (in the designated Green Wedge)
- Ongoing developments in Rhoose, St Athan, and Llantwit Major

The existing road network is already stretched. On a regular basis, it takes 25- 30 mins to travel by car the three and a half miles from my home to Barry. This development would further compound delays, congestion, and air pollution, severely impacting residents and businesses across the Western Vale. On a regular bases, it takes

4. Built Heritage

The proposed site lies near the Porthkerry Conservation Area and several listed heritage buildings. A ten-year construction phase for an industrial estate will have long-term negative impacts on the cultural character and tranquillity of the area. Legal & General's plans show no meaningful strategy to protect these irreplaceable historic assets. We must preserve this landscape for the benefit of future generations, in line with the Well-being of Future Generations (Wales) Act 2015.

5. Flooding and Sewage Infrastructure

The development poses serious risks of exacerbating local flooding and increasing untreated sewage discharge into the surrounding environment. Local infrastructure, including services managed by Welsh Water, has shown a lack of resilience and transparency in the past. These environmental hazards cannot be brushed aside or deferred — they must be avoided altogether.

Conclusion

Legal & General's application to develop Model Farm is misaligned with national policy, environmental priorities, and the needs of local communities. In contrast, the Welsh Government is actively encouraging farmers to manage land for biodiversity and sustainability — precisely the kind of use that Model Farm is suited for. This development is neither necessary nor appropriate, and should be rejected on the grounds of ecological damage, poor viability, inadequate infrastructure, and heritage loss.

Thank you for considering this objection.

Yours faithfully,

Jill and Peter Davies

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