Isabel Nethell
Head of Service, PEDW
Crown Building
Cathays Park
Cardiff
CF10 3NQ

10/6/25

Ref: CAS-02641-G8G7M5

Dear Isabel Nethell,
I am writing on behalf of the Barry and Vale Greens (part of the Cardiff, Vale and Valleys Green Party) to express our concerns around the environmental statement submitted as part of the planning appeal for the land at Model Farm.
This land currently houses mature ecosystems as well as diversified worked land (Wild Wales Seeds) which supports environment and rewilding projects nationally, as well as agricultural projects.

We believe the proposals contravene the duties outlined in the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015, which require that biodiversity is maintained and enhanced, and that development decisions promote long-term ecological and community well-being.

**Designated Sites and Green Corridors**
The site in question is close to two SSSI sites with ancient woodland: Barry Woodlands and Cliff Wood. Additionally, it is noted that within the site there is significant woodland habitat some of which is given SINC designation.
Despite assurances of buffers, around the SSSIs and SINC sites, we are concerned that this will not be sufficient to prevent indirect impact. The business park will lead to increased pollution and noise from vehicles and increased numbers of people and associated activities.
Inevitably, the consequences of such increase in activity will impact the vulnerable sites within the area and the ecosystems within them. The impact of this on the existing wildlife will be further increased by the development reducing the amount of habitat connectivity, which is a policy being pursued by important agencies in Wales (eg. Llwybr Newydd i Natur, 2023)

**Protected and Notable Species**
We note from the report that incidence of bats, dormice, Great Crested Newts, otters and birds have been assessed. Particularly of note were reports of bats and red/amber list breeding birds, alongside the knowledge that the area provides suitable habitats for otters and dormice.
We question whether the survey has been conducted during the best times for observation of dormice and breeding birds, and whether they were conducted over a long enough period. This may well explain the absence of dormice found in the survey. As such we are concerned that in

fact the incidence of this wildlife is higher than has been found and so the impact of any harm will be magnified.
The demolition of existing buildings will lead to bats losing their roosts. It is well known that bats are very loyal to their roosts and will not necessarily accept replacements, even in the same location (Bats, Advice for Making Planning Decisions, 2025; JNCC, Habitat Management for Bats, 2001).
We are concerned about the loss of ecosystem and habitat connectivity on these species of note, as well as all other species (including hares and [redacted]) who have been noted to reside in the area.

**Loss of Hedgerow**
The existing site consists of numerous fields: pasture and arable, and have boundaries of mature hedgerows and trees. Mature hedgerows are critical for carbon capture, as well as providing habitat for species such as dormice and birds.
The Hedgerows Act 1997 insists that 'important' hedgerows must be protected. We request that if this hasn't already happened, a full survey into whether or not the hedgerows proposed to be lost is completed to ensure that no 'important' hedgerow is damaged through this development.
Additionally, hedgerows are recognized as habitats of principal importance under the Environment (Wales) Act 2016.
Any replacement hedgerow will take significant time to establish and as such will not provide the necessary benefits of mature hedgerow for substantial periods of time.

**Water Pollution and Runoff**
The streams running through the site are classified as UK BAP priority habitats; and furthermore these streams join up the ancient woodland in the surrounding areas. As a result, every measure must be taken to ensure they are protected.
The increased amount of built-on land within the development will cause reduced drainage and increased runoff which could negatively impact the ancient woodland ecosystems and also any surrounding farming land.
Additionally, the construction operations will cause significant soil disruption which will further enhance such negative impacts to the area.
We are also concerned about increased stress on an already overburdened sewage system. Welsh Water frequently releases sewage into our seas and waterways, with releases in the last few days at the beaches in Barry. Further development over green spaces, and further sewage infrastructure, will only serve to increase this problem affecting not only the site in question, but those along the water/sewage course and we are concerned that there is not sufficient evidence that this has not been taken into account adequately.

**Climate Change Resilience and Tree Cover**
The business park element of this development will lead to significant areas of currently green space becoming built on. This is of great concern when considering the need for climate change resilience through carbon-capture.
Disrupting areas such as woodland and hedgerows will inevitably undermine such efforts including backwards steps for goals such as increasing tree canopy cover to 7.5% by 2039

(Vale of Glamorgan Tree Strategy); or increasing tree cover by 2000ha per annum from 2020 to 2030 (Welsh Government Woodlands for Wales).
Mature habitats cannot be directly replaced with newly planted habitats and so any mitigations planned as part of the development to plant new, will not overcome what is lost. Habitats take a long time to reach maturity and for species to embed year on year.

**Mitigations and Ecological Enhancements**
We recognise that the development plans to plant new native trees, shrubs and hedgerows; develop SuDS; and create new areas of grassland and water.
However, we are concerned that there will not be sufficient care taken to ensure that these new habitats are managed effectively and monitored to ensure that they develop in a truly sustainable manner. It is imperative that any new habitats do not attract invasive species, and areas must be monitored carefully and management plans must be created and implemented to prevent this from happening. Newly created habitats are particularly vulnerable to such threats, and so their value as true ecological alternatives is lessened, whereas mature habitats (as already exist at the site) are more impervious.

**National Ecological Impact from Business Loss**
When considering ecological impacts of this development, it is critical to consider the loss of a business which specifically supports native rewilding and the environment. Any cost benefit analysis must include the impact of a reduction of more than 150 acres of wild flower and grass seed production: seeds which are used nationally.

**Summary**
In conclusion, as detailed above, this development contradicts key Welsh Government legislation and environmental objectives.

The scale of ecological damage—loss of priority habitats, mature ecosystems, and legally protected species—cannot be mitigated by the proposed compensatory measures, and a net biodiversity gain is not achievable on this site.

We urge the Planning Inspectorate to reject this appeal outright and commit to a development strategy that prioritises brownfield sites, long-term sustainability, and compliance with national climate and biodiversity targets. Failure to do so risks significant ecological, legal, and reputational consequences.

Yours sincerely,
Amy Greenfield, on behalf of Barry and Vale Greens

References:
Wild Wales Seeds (2021): https://www.wildwales-seeds.co.uk/about-us/

Environment (Wales) Act (2016): https://www.legislation.gov.uk/anaw/2016/3/contents

The Well-being of Future Generations (Wales) Act (2015): https://www.gov.wales/well-being-of-future-generations-wales

Llwybr Newydd i Natur (2023): https://www.gov.wales/sites/default/files/publications/2023-10/llwybr-newydd-i-natur-nature-recovery-action-plan-our-strategic-road-network.pdf

Bats: Advice for Making Planning Decisions (2025): https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions

Habitat Management for bats (2001): https://data.jncc.gov.uk/data/23745574-3756-40ef-81cd-e6fea30decc0/habitat-management-for-bats.pdf

Vale of Glamorgan Tree Strategy (2024-2039): https://www.valeofglamorgan.gov.uk/en/living/planning_and_building_control/Planning/Tree-Strategy.aspx

Woodlands for Wales Strategy (2018): https://www.gov.wales/sites/default/files/publications/2018-06/woodlands-for-wales-strategy_0.pdf