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Ref: CAS-02641-G8G7M5 - Environmental Statement Non – Technical Summary 2024

To whom it may concern.

I am writing to voice my objection to a document submitted in support of a development proposal at Model Farm, Barry; planning application number 2019/00871/OUT

The document concerned is a revised Environmental Statement for the Model Farm development proposal submitted on behalf of Legal and General as an appeal - Environmental Statement Non – Technical Summary 2024. Having studied the document, I still have concerns and reservations regarding various aspects of the updated Environmental Statement.

Prominent is the irreparable damage to the natural environment - this is a great concern, which no amount of mitigation can successfully negate. For example; Ecology Section 9.8 essentially says that there will be a detrimental impact upon the wildlife in the hedges (priority habitats) to be destroyed but this will be compensated for at a later date with the introduction of new scrub vegetation – this seems illogical as these hedgerows are most likely hundreds of years old and the result of historic enclosure acts – the present hedgerows are present on the 1877 OS map and almost certainly pre – date this. The flora and fauna within them and their associated micro-eco-systems have taken hundreds of years to develop and are in harmony with the present environment – this is irreplaceable. It is a fallacy and unsupported by any evidence to suggest all the species and wildlife in these hedges will simply migrate to another hedge or will become re-established– they will just be destroyed and the wildlife killed.

Ecology Section 9.9 of the revised Environmental Statement goes even further and concedes that '*residual effects on protected and notable species are predicted to remain adverse*' with section 9.10 stating '*significant adverse cumulative effects are anticipated in respect of bats and breeding birds as a result of the construction and operation of the proposed development'*. These ongoing effects during operation can only be referring to the amount of pollution such a site will cause. No amount of revision can mitigate against the permanent erasure of green belt land and its biodiversity. Given this admission in the revised Environmental Statement, its content should be considered in regard to the Welsh Assembly Government's declaring of a Climate Emergency in 2019.

The creation of a business park with its associated pollution seems to contradict the WAG's own climate goals which is net zero by 2050 and the creation of this superfluous business park will only harm the local environment as there is a reliance of heavy goods vehicles at business parks. It is also a provision of the Environment (Wales) Act 2016 that the sustainable management of natural resources is a concern of the WAG – the wholesale destruction which will be wrought at Model Farm is at odds with this. Also, given that areas of the adjacent Porthkerry Park are designated SSSI (Site of Special Scientific Interest) it seems logical to conclude that given the extensive range of biodiversity which exists at Model Farm and the close proximity to the proposed development area to the SSSI that similar conditions would exist here too.

Socio Economics section 7

Socio Economics 7.2 of the revised Environmental Statement states that there is '*The need to achieve sustainable economic growth through the creation of good quality employment opportunities*' and it is further stated that:

7.4 This section presents the argument that, based on an unspecified number of pre-existing employers within the Vale of Glamorgan which offer employment in engineering, the building of a business park will lead to the creation of high value employment for local people with an emphasis on specialist engineering or '*high-order occupations and high-value employment opportunities for the residents of the Vale of Glamorgan to occupy'*,

This is of course fiction. There are a small number of engineering jobs which exist in the Vale of Glamorgan but they are highly specialist and therefore the average constituent within the Vale of Glamorgan is unlikely to take up these job roles. Also, this specialist engineering job creation is pure speculation as there has been no prospective business' who have expressed an interest in operating from the proposed site.

7.5 '*There have been changes to employment sites and associated market demand and working practices since the preparation of the socio-economics EIA'* yet we see the same situation as previously with the Vale of Glamorgan's own Viability Report remaining unchanged in its outlook. Also, there are already pre-existing sites in the Vale of Glamorgan such as at St Athan and Llandow which are already established and currently under used.

I understand the thoughts and feelings of the local community are regarded as irrelevant in the hard – nosed world of planning applications and big business, but if we consider this alone there is no evidenced public support for this development. Also, this development proposal must now be seen in conjunction with a separate development proposal at Weycock Cross – taken as a whole we will see a massive intrusion into the green belt area which, apart from the significant augmentation in traffic and pollution will also impact severely upon the visual character of the area and will represent another big step towards the conurbation of Barry and Rhoose which it seems is the ultimate goal – this must not be allowed to happen.

I hope these points will be taken into consideration.

Regards,

Jonathan Lambert