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

To Whom It May Concern

I write to you to state my objection regarding an appeal to the planning application (2019/00871/OUT) submitted by Legal and General (Strategic Land) Ltd for the erection of a 44.75ha Class B1/B2/B8 business park on land at Model Farm Rhoose.

In particular I wish to comment on elements of the Revised Environmental Statement (RES) 'Parc Busnes Porth Cymru-Model Farm, environmental statement non-technical summary' which was submitted to the PEDW by Legal and General in 2024.

Landscape and Character

Landscape and character (5.3) states that

It is acknowledged that any development will give rise to change in the landscape character of the application site itself and to the views of people overlooking, visiting or walking through the area. The extent of change will influence the judgement on acceptability and will need to be weighed against the benefits delivered by the development proposal.

It is the view of the author of this objection letter that due to the sprawling size and incongruous built form of the proposed development, the presence of a business park within the predominantly rural landscape at Rhoose and directly adjacent to Porthkerry Country Park, which is both a designated nature reserve and a SSSI, will represent an unacceptably obtrusive intrusion to the topography and character of the natural landscape. This development proposal seems wholly inappropriate and unnecessary considering that there exist far more suitable places within the near vicinity such as St Athan and Llandow to develop a business park. The Environment (Wales) Act 2016 states that the sustainable management of natural resources is a goal for the Welsh Assembly Government. It would be a curious use of the adjective 'sustainable' to allow such a development to proceed.

In short, I feel that the purported benefits touted do not weigh-up against the negative impact that this development proposal will have upon the natural environment.

Landscape and character (5.8) states that

the layout has been designed to retain the existing green infrastructure and the combination of the retention of the existing woodland, trees and field boundary hedgerows, together with the creation of new areas of woodland, scrub and rough grassland.

The retention of these elements will do very little to soften, mitigate or negate the overall negative effect that this development will have on the surrounding area. It will simply create and ugly juxtaposition of built and rural elements. '*Mitigation planting*' (5.18) also seems to be something that is a very poor exchange for the loss of this natural environment. The context of there already existing a '*major detractor in the local host landscape'*, namely Cardiff Airport (5.12) to me surely presents a positive case for the retention and preservation of the existing rural landscape against further built encroachment.

(5.14) states that *Consequently, there are a very limited number of visual receptors that would undergo the highest effects. These are limited to those in the immediate vicinity of the application site, namely residents living in the private residences associated with Upper and Lower Porthkerry Farm, Welford Farm private residences, walkers using the short section of PRoW P4/17/1 as it crosses the open field to the north east of the site and road users along short sections of Porthkerry Road and Port Road adjacent to the site boundaries.*

These '*limited numbers of visual receptors*', including Port Road and Porthkerry Road, comprise the actual sum total of the most important visual reception points from which the natural beauty of upper Porthkerry can be appreciated. These would be irrevocably harmed.

Ecology

Ecology (9.9) states that

'*Residual effects on protected and notable species are predicted to remain adverse*'. Section (9.10) states '*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'*.

The proposed mitigation measures appear to be totally inadequate against such an adverse effect upon the local ecology.

Built heritage

In addition, there would also be a negative impact upon the local built heritage

(6.8) *There will be changes to the settings of the identified built heritage receptors at construction phase and this will give rise to a range of significance of effects from a neutral to minor adverse significance of effect.*

(6.9) Specifically, there will be a permanent long-term Minor Adverse significance of effect on Lower and Upper Porthkerry Farmhouses (HB1 & HB2) and the Porthkerry Conservation Area (HB7). Church Farmhouse and associated Outbuilding (HB4 & HB5) will experience a permanent long-term Minor/Neutral Adverse significance of effect.

It is challenging to conceive how these adverse effects can be considered to be 'minor'.

Highways and transportation

(4.4) Highways and Transportation from the RES has stated that *Operational effects: The development proposal will increase daily travel demand in the area*. (4.6) *predicted that the development proposal will have a moderate significant adverse effect on driver delay on the A4226 between the site access and the Waycock Cross roundabout.* Consequently. *A number of improvement measures are embedded in the proposal.*

Having read these measures it is difficult to imagine how they would be of any practical use in that they would do very little-if nothing, to ease congestion.

Viability Review

The site is allocated in the Preferred Strategy under Policy SP13: Employment Growth, as Major Employment Allocation 2. The draft allocation of the site recognises the value of its delivery to the local and regional economy.

The Viability Review (2024) stated that the use of the Bro Tathan Business Park, as well as a number of other locations throughout the Vale of Glamorgan, would represent a far more viable location for commercial expansion for advanced manufacturing and engineering. The Viability Review states that Celtic Business Park Newport, Gwent Europark, also in Newport, Llantarnam Industrial Estate in Cwmbran, Vale Business Park Cowbridge, Bocam Business Park and Pencoed Technology Park, would be far more suitable locations to accommodate commercial enterprises. The use of these alternative site would accord with The Environment (Wales) Act 2016.

The reported also stated that

(4.3) *We think it unlikely that this level of demand exists in this location. We are of the opinion that the take up rate proposed is unachievable. Competition from existing business parks and the recently launched Bro Tathan Development will undoubtedly have a detrimental impact on take-up.*

Development antecedents

A number of development proposals within the near vicinity of Model Farm were submitted a number of years back by various developers in the Weycock Cross area, notably at Walter's Farm. In terms of scale and function, the Walter's Farm development proposal encompassed a number of similarities to the development proposal at Model Farm, notably the inclusion of business units. All of the Weycock Cross development proposals were refused for, among other reasons the '*impact upon the appearance of the countryside and the existing special landscape area*'. These material considerations would also logically apply to Model Farm. Another reason the Weycock Cross developments were declined was the failure to '*mitigate against the increase in traffic*'.

For the reasons outlined above I am in favour of refusing the granting of planning permission for a business park at Model Farm. I hope that my views will be taken into consideration.

Yours Sincerely

Mark Lambert