



Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

9 December 2024

By email only to: Planning.Directorate@gov.wales

Your ref: CAS-02641-G8G7M5

Dear Sir / Madam

**PROPOSED CLASS B1/B2/B8 BUSINESS PARK
LAND AT MODEL FARM, PORT ROAD, RHOOSE CF62 3BT
APPLICATION NO. 2019/00871/OUT**

We write to raise our concerns about the above planning appeal, which has been called in via the exercise of powers granted to Welsh Ministers under section 79 and paragraph 3(1) of Schedule 6 of the Town and Country Planning Act 1990.

The Welsh Government Planning Directorate has confirmed that the planning appeal will therefore be determined by Welsh Ministers. RSPB Cymru supports the calling in of this planning appeal and agrees with Ministers that the proposal is a major development which could have wide effects beyond its immediate locality. It is important that the highest level of scrutiny is applied to development proposals that could potentially impact nature given the ongoing loss of biodiversity, and the global recognition of the need for urgent action to be taken to reverse this. This is reflected in Wales' National Milestone for biodiversity: *To reverse the decline in biodiversity with an improvement in the status of species and ecosystems by 2030 and their clear recovery by 2050.*

The State of Nature Wales 2023 (<https://stateofnature.org.uk/countries/wales/>) reported a 20% decline in average species abundance in Wales since 1994 and found that one in six assessed species is at risk of being lost from Wales. Reversing this decline will require the Welsh Government to proactively protect and restore nature at scale.

To arrest and reverse the decline in species, it is vital to protect key habitats, including ancient woodland which is deemed irreplaceable, as set out in Footnote 129 of Planning Policy Wales (PPW). Such habitats, along with protected sites for nature, are core to the development of 'resilient ecological networks' promised in Wales' Natural Resources Policy (<https://www.gov.wales/sites/default/files/publications/2019-06/natural-resources-policy.pdf>).

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Mae'r RSPB yn rhan o BirdLife International, rhwydwaith o gyrrf angherddol, sy'n cydweithio i achub byd natur ledled y byd.
The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

This policy notes urbanisation as one of the drivers of change leading to loss and fragmentation of habitats and species. Nature-friendly farming is also vital in providing a mix of habitats and supporting the maintenance and recovery of species populations, and critical in meeting Wales' nature and climate goals (wales-nmb-report-eng-compressed.pdf).

The importance of access to nature-rich green space, due to the health and well-being benefits to people of access to nature, are well documented (<https://naturalresources.wales/about-us/news-and-blogs/blogs/boost-your-health-and-well-being-by-connecting-with-nature/?lang=en>) and should be maintained and protected wherever possible.

The RSPB wishes to be notified in writing of progress, including the outcome of the determination. For future correspondence on this matter, please contact Simon Hugheston-Roberts at the following email address: [REDACTED]

Yours sincerely,

[REDACTED]

Alun Prichard
Director, RSPB Cymru

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