VALE COMMUNITIES UNITE

VALE COMMUNITIES UNITE AGAINST THE DEVELOPMENT OF MODEL FARM

PEDW: CAS-02641-G8G7M5-Land at Model Farm,

Port Road, Rhoose, CF62 3BT

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Introduction

1. I am the chair of Vale Communities Unite (VCU) and submit this statement to address three matters: (a) first, to provide an introduction to the group and why we campaign so hard to save Model Farm from being developed into a business park, and (b) second, to briefly comment upon the matters which the Inspector has identified, and (c) third, for the purposes of exhibiting several key documents which do not appear to have yet been provided to PEDW, but which are material to the appeal (listed in the appendix to this statement) and in circumstances where the LPA/Appellant have not yet produced an Index of Core Documents. The documents included within the appendix are available on the Local Planning Authority's online planning portal, but do not seem to be on the PEDW casework website, and so we have included for completeness.

Background to VCU

2. VCU was set up in 2019 as a group to campaign on behalf of the community of Rhoose and surrounding areas who fervently oppose the building of a business park on Model Farm in the Vale of Glamorgan. The group evolved after the consultation process that was instigated by both the applicant for this development, Legal & General Group and the Vale of Glamorgan Planning Department. The result of the consultation processes resulted in strong opposition to the development. An open meeting was convened in the village which was attended by a large number of residents and politicians from Welsh Government.

3. VCU actively engage, on social media, with over 2,300 followers from the local community and further afield, updating them on the current situation with regards to this planning application. As a group we have organised demonstrations at the Welsh Parliament and around the Vale of Glamorgan. We have undertaken communication with local news outlets and lobbied local councillors to show our ongoing commitment to the residents of Rhoose and beyond with regards to saving Model Farm. VCU representatives have spoken against this application, raising legitimate objections, at Vale Planning Committee meetings on numerous occasions.

4. The support and encouragement, shown by our community to the VCU team, has been exceptional. We have received donations to a fund, set up to take on Legal & General, by way of personal donations and attendance at fund raising events arranged since the group was started. Without this outstanding support we would not be in a position to have engaged a legal team for this inquiry.

5. So far this planning application has resulted in a judicial review, which found in favour of the Claimant, as a result of financial information not being disclosed when it should

have been. We as a group have highlighted inadequate evidence, such as inadequate biodiversity issues being presented to council planning meetings together with outdated reports being presented for consideration at such meetings. We have little confidence in the evidence submitted for this planning application and feel there is no logical need for a business park being built in this location.

6. It is our submission that Legal & General undertook the purchase of land, near airports, around the United Kingdom, which included Model Farm, not to act as responsible custodians of the countryside but as a land banking exercise for the financial benefit of their investors. I recall that a representative from Legal & General made the comment at one of the Council planning committee meetings that they had been working on this application for over twenty years.

7. As a result of Council being asked to identify land for Local Development Plans the area of Model Farm, that had been removed from the green wedge in 2009, was put forward by Legal and General and added to the Council's plan.

8. There are a large number of documents that are already available to this inquiry which highlight subjects such as financial viability and demand for such a business development in this location. With this in mind I will make a short statement on the subjects this inquiry has deemed relevant and which the communities of Rhoose and surrounding areas have strong concerns about. Undoubtedly these will be examined further during the inquiry itself.

Adequacy of the environmental statement and ecology

9. There have been a number of attempts by Legal & General's representatives to present an adequate environmental statement for this development. The original statement has been superseded a number of times, sometimes based on objections we as a group have raised. We still feel the current statement does not fully mitigate the damage that this development will cause and is something we hope this inquiry will investigate further.

10. For years the farmer, together with his family on the farm, have nurtured the land, supplying food to the surrounding areas and in doing so have helped the biodiversity on the farm to thrive. There are a number of Protected / Endangered species recorded on the South East Wales Biodiversity Records Centre (SEWBREC), which live and breed on the farm which updated reports by RPS now finally acknowledge.

11. The world has changed dramatically since Legal & General took the gamble to purchase this farm. It has been reported that Wales is in danger of losing 25% of its wild bird population due to humans and development. COP 15, dealing with

biodiversity issues, was held in Canada and was attended by Julie James MS representing the Welsh Government.

12. The U.K as a whole was subject to severe criticism for its watering down of previous strong Biodiversity and Climate Emergency statements. We as a country were asked to demonstrate our commitment to this by giving clear leadership to the world on our commitment to this important cause. Both Welsh Government and the Vale Council has given their commitment to these concerns.

13. If this development is given permission to go ahead the land supporting nature conservation would disappear. There will be the development itself to the North, the airport to the west, an area of land to the south that would be open to the wider public and intensively farmed land to the east that does not use the same farming techniques as on Model Farm. It is VCU's opinion that this would undoubtedly have a devastating impact on nature conservation.

Landscape and character

14. The Vale of Glamorgan has always been a special place to visit, from its spectacular coastline to the green countryside. Welsh Government often refer to the Cardiff Wales Airport as the gateway to Wales. At present visitors arriving by air can often see the colourful display from the wild flowers Model Farm produce and the view passengers see while travelling across the iconic Victorian railway viaduct, often used by the local council for publicity, is one of green farmland. This together with the grade II listed houses is a sight to behold and something the community treasures. This development will do nothing to enhance this appearance.

Transport

15. There is one main road to and from the Barry area serving the western vale. The A4226 is a two lane road that wasn't built to accommodate large numbers of vehicles. Since Model Farm first appeared on a planning application there has been a significant increase in housing and other developments in the Western Vale all adding to an increase in traffic. Planning permission has already been granted for a new Advanced Technology Centre for Cardiff and Vale College, essentially an Aeronautical College (ref: 2024/00329/FUL), on land opposite the farm, with a prediction of 1300 people using the facility.

16. The Cardiff Capital Region group have plans to redevelop the now disused Aberthaw Power Station which will undoubtably increase traffic further.

17. Ask anyone who travels from the Western Vale, in or out of Barry, how any minor road works or accident impacts on traffic delays and they will tell you it's a nightmare. That

will only get worse given the increase in vehicles anticipated using this proposed development.

Heritage

18. It should be noted that the Council's Conservation Officer has previously recommended refusal of this application due to the impact it could have on a number of listed buildings and locally listed 'County Treasures'. . The possible implications of water drainage from this development and impact of attenuation ponds have the potential for flooding to Porthkerry Park and Edgerton Grey House which in our view is unacceptable.

Conclusion

19. In conclusion I would add that VCU and the community of Rhoose fully appreciate that there is a necessity to build new homes and business developments. There are new house building projects already in the pipeline within Rhoose itself. The new aeronautical college is being built on land that has fallen into disuse and provides no realistic farming potential.

20. What we strongly object to is a viable working farm that has diversified into producing wild flower seeds, sold around the country helping to encourage insects to propagate, a farm producing food for our community whilst protecting and promoting biodiversity should be destroyed.

21. At some point, if this development is approved, Legal and General and their developers will move on to their next project. It will be the people of Rhoose and surrounding areas that will have to deal with the aftermath of this unwanted and unnecessary business park.

[redacted]

Mr Philip Gibbs

Chair, Vale Communities Unite.

13.03.25

APPENDIX – DOCUMENTS EXHIBITED TO THIS PROOF OF EVIDENCE (NB no list of core documents has been prepared by the LPA/Appellant)

No.	Date	Document
1.	09.07.19	Letter from Boyer Consultancy to RPS pre-appl consultation
2.	09.07.19	Letter from Hawkeswood Ecology to Boyer Consultancy
3.	July 2019	Review of Landscape and Visual Appraisal by Viridian Landscape
4.	July 2019	Review of Sustainable Drainage Assessment by Stanec
5.	01.10.19	The Woodland Trust/Coed Cadw's comments on old trees on Stevens' land
6.	01.10.19	Letter from Boyer Consultancy on Draft Supplementary Planning Guidance August 2019
7.	03.10.19	Local Planning Authority's Conservation Officer objection and recommendation of refusal
8.	25.10.19	Letter from Boyer Consultancy to Vale of Glamorgan Council ("VoG")
9.	09.04.21	Letter from Boyer Consultancy to VoG – additional representations
10.	12.07.21	Letter from Boyer Consultancy to VoG – additional representations
11.	17.09.21	Appendix 2 to Boyer letter – Audit of LVA by Viridian Landscape
12.	Oct 2019	Appendix 3a to Boyer letter – Review of Preliminary Ecological Appraisal by Hawkeswood Ecology
13.	24.10.19	Appendix 3b to Boyer letter – Response to RPS Species Surveys
14.	20.05.21	Local Planning Authority's Ecology Officer holding objection and request for further information
15.	17.02.22	Letter from Boyer Consultancy to VoG – additional representations
16.	14.06.21	Local Planning Authority's Ecology Officer note for applicant
17.	26.05.22	The Woodland Trust/Coed Cadw's comments on the application
18.	15.11.22	Local Planning Authority's further comments on the application by email

19.	20.12.22	Letter from Boyer Consultancy to VoG – additional representations
20.	Feb 2023	VCU Report and emails to Planning Committee
21.	01.03.23	Letter from Boyer Consultancy to VoG – additional representations
22.	13.02.24	Letter and Form from Boyer to VoG re Replacement Local Development Plan 2021-2036 Preferred Strategy Representations
23.	19.12.24	Letter from Boyer Consultancy to PEDW