

## Contents – Paper 2A

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Dear Gareth,

Thanks for your e-mail.

The ship namely M.V.Julia has now been purchased and is currently berthed here in Cork.

Berthing trials took place in Swansea last week,ie.on Tuesday 22<sup>nd</sup> September.

It was visited by The Lord Mayor of Swansea while in port.

Fastnet line now has an office in Penrose Wharf,Cork.

A Chief Executive has been appointed.

The service is scheduled to commence on 1<sup>st</sup>.March,2010.

Fundraising continues towards raising a further euro 2.5m.

We are confident the restoration of this link shall develop the full economic,social,cultural and sporting links between our 2 countries.

It allows passengers and freight to travel at convenient and social times.

It cuts down driving time and meets the statutory and logistical requirements of lorry drivers.

Full details and news on the Campaign are posted on

[www.bringbacktheswanseacorkferry.com](http://www.bringbacktheswanseacorkferry.com)

Investment details and preliminary booking enquiries on

[www.fastnetline.com](http://www.fastnetline.com)

Thank you again for getting in touch.

Your continuing interest and support is indeed much appreciated.

Best wishes,

John Hosford

Sandy Mewies AM  
Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

Your ref:  
Our ref:  
Email:  
Direct line: 01982 554200  
Date: 11<sup>th</sup> September 2009

Dear Sandy

3157

**Petition – Keep Abergavenny Livestock Market**

May I thank you and the National Assembly's Petitions Committee for seeking NFU Cymru's views on the 'Keep Abergavenny Livestock Market' petition, NFU Cymru represents approximately 600 members in the county of Monmouthshire, and the issue of the location and future of Abergavenny Livestock Market has been the subject of debate and discussion for over 12 years now. The demise of both Monmouth and Newport livestock markets now means that Abergavenny livestock market is the only such market within the county of Monmouthshire, a situation which is of some concern to our members.

Our submission to your committee is based on a county meeting that was arranged specifically to discuss this issue on the evening of 3<sup>rd</sup> September, at the Alice Springs Golf Club near Usk. An invitation was extended to all our farmer and grower members in the county, and we had a turn out of over 100. Over 90% of those present supported the Council's intention to provide the county with a new livestock market, provided that there was a smooth transition from the old site to the new site and that the protection of the Abergavenny Improvement Acts is conferred upon the new site.

It is also worth the committee noting that the catchment area of Abergavenny market takes in not only Monmouthshire but also much of south east Wales including the old Glamorgan counties, significant parts of Powys and of course some neighbouring English counties such as Herefordshire, however as this issue is most pertinent to the county of Monmouthshire we did not canvass the view of those outside of the county.

It is our view that the Central Monmouthshire proposal tabled by Monmouthshire County Council offers a sensible way forward and has the advantage of being located near some very good road links. The Abergavenny Act as it currently stands requires that there is a livestock market somewhere within the yellow coloured area in the deposited plan which accompanied the 1854 Abergavenny Improvement Act. At the meeting of 3<sup>rd</sup> September, it was the overwhelming view of our members that NFU Cymru should oppose the repeal of the Abergavenny Improvement Acts (as this would remove the obligation currently in place on Monmouthshire County Council to provide a market



somewhere within the 'yellow coloured area' of the deposited plans), but that we would support the amendment of the act(s) so that the obligation on Monmouthshire County Council would be for them to provide a market somewhere within the county of Monmouthshire.

Whilst NFU Cymru sympathises with those who would like to uphold the tradition of Abergavenny as a market town and who fear that perhaps something might be 'lost' from Abergavenny were the livestock market to relocate from the centre of the town, we would nonetheless point to some of the practical and logistical difficulties which are associated with holding a busy livestock market in Abergavenny even if it were feasible to upgrade the existing facilities. With Monmouth and Newport livestock markets now closed an increased demand has been placed upon the existing Abergavenny market site. Problems have now started to become apparent with existing fixtures and fittings at the market, and the shortage of parking and manoeuvring space for today's large lorries is leading to increasing congestion at and around the market. We believe that a new livestock market which can provide up to date facilities as well as adequate parking and access for large articulated lorries is now overdue.

The Keep Abergavenny Livestock Market proposal for the re-development of the existing site would give rise to logistical problems in terms of undertaking building work whilst the site still functions as a busy livestock market, in addition to this, the re-development of the existing site would have to be financed by farmers, hauliers, auctioneers etc who would never actually get to own the freehold of the site.

We would also add that the true motivation of some of those who have come out in support preserving Abergavenny livestock market may have little to do with upholding the history and tradition of Abergavenny as a livestock trading centre, but rather may have more to do with a desire to thwart and frustrate the development proposals of Monmouthshire County Council. The market plays an essential part in the livelihood of very many farmers in the surrounding area and further afield and it is very important that the views of *bona fide* local farmers are taken in to consideration and not just the views of vocal lobby groups. We would however support KALM's view that Abergavenny could potentially have a similar facility to the one which was developed in Skipton.

We would also challenge the assertion which has been made by some that users of the market bring with them a wife or partner who may then subsequently spend money in the town centre shops, we would assert that this is not the case in the majority of instances.

Were the Abergavenny Acts to be repealed then NFU Cymru and its members would look to Monmouthshire County Council to provide a new site for a livestock market at a suitable location so as to give a seamless transfer, by which we mean that from the moment any decision is made to close the old Abergavenny site for re-development, work on the development of a new site gets underway immediately with the proviso that the old site remains in use as a livestock market until such a time as work is completed on the new site.

I hope that I have clearly set out the position of NFU Cymru's members, if you would like any further information then please do not hesitate before getting in touch with me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Huw Thomas', written in a cursive style.

Huw Thomas  
Assembly Adviser  
NFU Cymru

COPY



**FARMERS' UNION OF WALES**  
**UNDEB AMAETHWYR CYMRU**  
G W E N T   B R A N C H   ·   C A N G E N   G W E N T

County Office/Swyddfa Sirol: Park Chambers, 10 Hereford Road, Abergavenny, Monmouthshire, NP7 5PR.  
Tel/Ffôn: (01873) 853 280. Fax/Ffax: (01873) 859 861. E-mail/E-bost: gwent-fuw@btinternet.com

Reference/Cyfeirnod:

GD/HT

Date/Dyddiad:

15<sup>th</sup> September 2009

Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

Your ref: P-03-205

Dear Sirs

**Re: Petition – Keep Abergavenny Livestock Market.**

Your letter dated 13<sup>th</sup> July 2009 addressed to Mr Nick Fenwick, Director of Agricultural Policy at our Head Office, has been passed to me for reply.

As I am sure you are aware the issue of the future of a livestock market in Monmouthshire has been under some question for a considerable number of years. The former market sites at Monmouth and Newport are now developed and obviously this has meant that the livestock from Monmouthshire and indeed from further afield has been concentrated into the Abergavenny Market site, with the traditional Abergavenny Market being held on a Tuesday and the Newport market now being held there on a Wednesday.

The fact that a market facility is now provided on two days a week at Abergavenny, makes it apparent that the existing facility is somewhat short of being ideal in terms of providing easy and convenient access for livestock vehicles and also in terms of requirements under the Animal Gathering Order acts. The facilities at the market have become outdated and in some cases obsolete and this can be understood in respect of the uncertainty which has been in place regarding the future of the market. It is unlikely that renovation of this site will be undertaken, if the term available for using the site is only for a short period, and with the possibility of moving to a new market still being in the balance. In addition the question of who provides the funding for up-dating facilities needs to be addressed.

Your letter of the 13<sup>th</sup> July asks for our views on the impact of the redevelopment of Abergavenny Livestock Market and the establishment of a new regional market at Raglan. The priority in considering this question is that it is imperative that a market facility is available to our members from throughout the County of Gwent whether this being at the existing site or on a new market site outside of the town.

We recently conducted a survey of our members which asked the question whether  
1) they wanted the market to remain where it was in Abergavenny 2) to relocate to

new premises or 3) did not mind either of the above options as long as a market was available within the County. Unfortunately the response to our questionnaire was somewhat disappointing with only 36 members replying out of 290, of these 53% indicated that they wished the market stay in its present location, whilst the remainder were split equally between the other two options. However, having discussed this matter with very many more of our members, I would again emphasise the priority is that there is an up to date and efficient livestock market available for their use within the County. The County of Gwent is renowned for the production of prime stock whether it be for breeding or meat production and our members feel, that it is disappointing that after so many years debate, over this issue there is still no clear way forward.

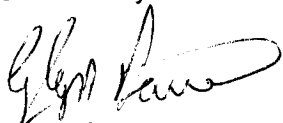
One very important point is that if the existing market site is developed and a new market at Raglan opened, the transition from one to the other must be immediate that is one week Abergavenny must close and the next week Raglan must be up and running. Any break in trading would have a very serious and possibly irrevocable impact on the marketing of stock from the County, as farmers would obviously have to find an alternative location for selling their stock and this may therefore lead to a new market not being fully utilised.

We are therefore of the opinion that if Monmouthshire County Council are unable to proceed with their plans for a new market site then the Abergavenny Improvements Acts of 1854 – 1871 should not be repealed and all efforts are made to bring the existing facilities up to date. However if Monmouthshire County Council are successful in providing a new market site then we would urge that the existing Improvement Acts of 1854-1871 are amended to cover the new market site.

This would give the current and indeed future generations of farmers throughout the County the security which they need by maintaining a livestock market to sell the outstanding quality stock which this area can produce.

We trust the above is suitable for your purposes but if we can be of any further assistance in this matter, please do not hesitate to contact us.

Yours sincerely



Glyn Davies

COUNTY EXECUTIVE OFFICER

## ABERGAVENNY MARKET AUCTIONEERS LTD

### Views Concerning The Proposed Redevelopment of Abergavenny Cattle Market

Over the last 12 years debate has taken place over the future of the livestock markets in Monmouthshire i.e. Abergavenny and Monmouth and, although not nowadays in Monmouthshire, Newport. All three were old town centre markets in need of substantial upgrading and occupying strategically located sites, each of which was being used only 1 or 2 days a week sometimes for only a few hours.

The potential to put these sites to better use was and is obvious as is the need for a modern livestock marketing facility. The auctioneers at all the markets supported Monmouthshire County Council in their proposals to build a single centrally located livestock market and to redevelop the sites in Abergavenny and Monmouth. Newport market although frequented by many Monmouthshire farmers was not under the control of Monmouthshire County Council and was owned by a privately owned property company.

Over the years first Monmouth and more recently Newport Markets have closed as their leases have expired and the sites redeveloped. On each occasion the auctioneers from Monmouth and Newport have joined with AMAL and moved their sales to Abergavenny on the understanding that this would be a temporary arrangement until a new market was built in the centre of the County.

Unfortunately Monmouthshire County Council's best efforts to provide a market have been frustrated, despite having granted planning consent on 3 different sites. The latest site at Bryngwyn is still being threatened by the prospect of a Judicial Review from opponents despite having been passed with no votes against and the support of all political parties on the planning committee.

This application is being opposed by some and demonised on the basis that Monmouthshire County council should not be providing a "regional market". We believe that it will be a long overdue County Market to replace Abergavenny and Monmouth and those that once existed in Usk and Chepstow whose supporters from the south of the County then had to use Newport.



All the livestock from Monmouth and Newport markets is now squeezing in to Abergavenny and on busy days there is insufficient space to accommodate all the livestock vehicles.

The strain is beginning to tell as the old and in some cases obsolete fixtures and fittings are inadequate and beginning to fail and the acute shortage of parking and manoeuvring space especially for today's large lorries causes more and more congestion in and around the market and forces more Land Rovers and trailers out into the car parks. This will only increase when we come to the busiest period of the year in the Autumn.

The need for a new livestock market able to provide up to date facilities meeting present day welfare and safety standards and with adequate parking and ease of access for large articulated lorries is evident and urgent. The current overcrowded facility where livestock, people and vehicles are all intermingled is both inconvenient and potentially dangerous.

It is for these reasons that we have not supported KALM's campaign to keep the livestock market in town. Whilst sympathising with those who value the tradition and feel the town might lose something if the market were to move out of Abergavenny we cannot allow this romantic and somewhat historic vision to cloud the harsh realities of running a livestock market business and providing the highest welfare standards and best service for the market users in the 21<sup>st</sup> Century. Even if it was possible from both a practical and financial perspective to upgrade the present facility, it would not solve the problem of accommodating all the market traffic and indeed by making the market more attractive would only exacerbate the problem.

It is less easy for us to sympathise however with those whose only real motive for keeping the market in town is to thwart the development proposals of Monmouthshire County Council. Whilst everyone is entitled to express their opinion they should not seek to use the livestock market on which many farmers rely for their living as a pawn in pursuit of their own campaign interests. It was revealing to note how few of those on KALM's protest march were actually market users.

KALM have made much of the support which they claim to have for their position both from the community at large and from farmers. Whilst it is undoubtedly true that they have obtained many signatures on their petition we believe that the majority of

the signatories were not aware of all of the issues surrounding the redevelopment of the cattle market site and not unnaturally the KALM supporters who were canvassing their signature were very selective in the information which they provided to people whilst collecting signatures.

We know that many of the farmers who signed the petition did so in the belief that they were being asked to show their support for a livestock market in Abergavenny which was being threatened by the proposed development and did not understand that the repeal of the Abergavenny Improvement Acts was a prerequisite of Monmouthshire County Council being able to develop and fund a new livestock market.

So far as the wider community is concerned many of these signatures were gathered in Abergavenny town centre where shoppers, visitors and passers by were stopped and informed of the "threat to the local shops and businesses in the town centre" that would be occasioned by the advent of an Asda supermarket being built on the cattle market site. Asda in particular was painted as the villain of the piece which had to be stopped at all costs and opposing the repeal of the old Acts was put forward as the best means of achieving this. Again understandably many people signed the petition as an anti Asda protest and it was not explained that in reality the choice was likely to be between a supermarket in town (on the cattle market site) or a supermarket out of town, if no town centre site could be found to meet the unquestioned demand. We now know that Asda have withdrawn their interest in the site and it may well be that an alternative food store operator might be better received. In addition there is a new threat of an out of town store at Llanfoist and as a result the level of opposition to the proposed development could well wane.

We have no doubt that some of the leading members of KALM have the best interests of Abergavenny and the livestock market at heart and have some excellent suggestions as to the way in which a livestock market could be developed and run. Many of these we would agree with and would welcome the opportunity of pursuing, however they all require space and we do not see how they can be accommodated on the present market site which is too small to accommodate even the present purely livestock market use now that throughput has increased following the closure of Monmouth and Newport markets.

KALM have put forward Skipton market as a model that could be copied in Abergavenny, however it should be noted that Skipton moved from its town centre site to a much larger out of town location and occupies a site several times the size of the Abergavenny market site. The livestock building alone would cover most of the area available in Abergavenny and would be a monstrous construction in the heart of our town.

For all of these reasons we believe that the best interests of both the farming community and the town of Abergavenny would be served by the market moving to a new out of town site to permit a sensitive development of the existing cattle market site.

We believe that the decision as to whether the Acts should be repealed or amended should be based on the reasons why they were enacted in the first place and whether those reasons still hold good, rather than whether the Acts can be used to stymie any proposed alternative development, which should be dealt with on its merits through the normal planning process. We understand that the purpose of the Acts was to ensure an orderly and appropriate market place was made available for the trading of livestock. There is undoubtedly still a demand for such a facility in the County as the present level of use of the market in Abergavenny can testify. The present site is however no longer appropriate for the reasons set out above and we submit that there is a very good case for the market to move to a more appropriate and larger site in a suitable location able to meet present day standards and the needs of the agricultural industry. It would be ironic if KALM's campaign succeeded in keeping the market in the centre of Abergavenny only for it to decline for lack of investment and an inability to compete with more modern markets at Brecon, Ross-on-Wye or Hereford.

However let no-one be under any misapprehension as to our determination to maintain a livestock market in Monmouthshire. If Monmouthshire County Council are unable or unwilling to provide a new market we will fight tooth and nail to retain the only facility we have despite all its shortcomings. Our support for the repeal of the Abergavenny Improvement Acts is therefore conditional upon Monmouthshire County Council having provided a new livestock market and we do not believe that the existing facility should be closed until a satisfactory alternative is ready for use.

We would ask therefore that, if possible the Acts be amended to require Monmouthshire County Council to provide a livestock market within the County and to make closure of the existing market conditional upon a new market being available for use.

We understand that a similar requirement has been imposed on the Local Authority as a condition of the repeal of the Acts governing Hereford Market.

Keith Spencer  
Abergavenny Market Auctioneers Ltd

# Keep Abergavenny Livestock Market

## Additional information for the NAW Petitions Committee

The Petitions Committee will, either presently or in due course, be considering replies from the National Farmers Union (NFU) and the Farmers Union of Wales (FUW) about the KALM petition calling for the non-repeal of the Abergavenny Acts.

The leadership of these organisations have made it clear in the past that they support the County Council plan to sell Abergavenny market in order to fund a new livestock market at Bryngwyn, near Raglan. However, the KALM group have long known that the leadership of these unions do not reflect the views of the majority of upland farmers in Abergavenny and district, though they may claim to do so.

The NFU will no doubt cite their recent meeting held in Alice Springs golf club at Chainbridge, in which the great majority of those present voted for the new market at Bryngwyn. KALM members who were present report that the meeting was carefully managed to obtain this result for these reasons:

- the meeting was poorly advertised in the North of the county with the result that many Abergavenny and district farmers were unaware it was happening. For example, it was not advertised in the local Abergavenny newspaper.
- the alternatives were presented to the meeting in a very loaded way with attendees being explicitly told that under the KALM plan they, the farmers, would have to pay for the refurbished market in Abergavenny. KALM have never said this, and it is a gross misrepresentation of our plan. Farmers were being asked to vote for a free market, or one which they would have to pay for. That is not a fair way to present the KALM plan.

KALM now have irrefutable evidence to support our claim that the NFU and FUW leadership do not speak for Abergavenny and district farmers, whether those farmers are members of these unions or not. The evidence comes from a series of 4 meetings which KALM have arranged in village halls around the Abergavenny district to make it easier for upland farmers to make their views known. The meetings included a ballot form (attached) on which farmers and other market users could express a preference for either retaining the Abergavenny market or having a new market at Bryngwyn. Voting forms have also been posted, or otherwise distributed, to local district farmers who said they would be unable to make the meetings. Some meeting attendees took voting forms away to complete at their leisure and/or to give to farmer friends unable to attend.

It was made clear to attendees that only farmers and other market users such as hauliers or auctioneers were eligible to vote. This rule excludes members of the public from voting as well as all members of the KALM working group and their families.

In order for the Petitions Committee to have some information for its next meeting on 20th October we can give the interim results of the voting, after two meetings:

### Votes captured at the actual meetings in Pandy and Llanfoist village halls:

In favour of keeping the market in Abergavenny:	39
In favour of a new market at Bryngwyn	5

### Votes received by post or hand delivery as at 11th October 2009:

In favour of keeping the market in Abergavenny:	26
In favour of a new market at Bryngwyn	1

**Total interim vote count as at 11th October 2009:**

<b>In favour of keeping the market in Abergavenny:</b>	<b>65</b>
<b>In favour of a new market at Bryngwyn</b>	<b>6</b>
<b>No clear preference expressed</b>	<b>1</b>

This is only part-way through the consultation process yet it has already captured a significant proportion of Abergavenny and district farmers and is therefore a statistically significant result.

Openness. The voting forms provide for the voter's name and address. This would enable independent verification of the legitimacy of the vote should it ever be called into question. This open and verifiable process contrasts with the vote at the NFU Alice Springs meeting which was obtained by a simple show of hands, precluding any possibility of a re-count or independent scrutiny.

KALM have already checked the forms received to ensure there are no duplicate votes and that, as far as we can tell, all voters comply with the eligibility rules.

The Committee will be advised of the final result after all 4 meetings have been held and all postal votes are in. We currently have no reason to think that the broad message will change.

KALM would like to advise the Committee that our opponents have made a concerted attempt to destabilise farmer opinion in two principal ways:

- by asserting at regular intervals that Abergavenny livestock market could be shut permanently at any time by DEFRA or by the Health and Safety Executive on animal welfare grounds or H&S grounds or biosecurity grounds.
- by repeating the false assertion that the KALM plan would have to be financed entirely by farmers. The question of finance is obviously important and a perfectly valid issue to raise, but it is being done in a "scare tactics" way to frighten farmers.

We know from our conversations with farmers that these scare tactics have influenced a few. But in spite of these destabilisation tactics by our opponents, the voting speaks for itself.

The NFU and FUW leadership clearly does not represent the wishes of the farming community for whom the Abergavenny livestock market was built and which it has served for hundreds of years and which the Abergavenny Acts were designed to safeguard. To remove that safeguard would in our view be a betrayal of the community who clearly wish it to remain.

Jenny Long  
Barry Greenwood  
on behalf of the KALM working group

11th October 2000

# Abergavenny livestock market poll

## For all eligible\* farmers and users of the market

The National Assembly for Wales Petitions Committee have requested the views of farmers on a Petition submitted by the Keep Abergavenny Livestock Market group. (KALM) The Petition calls for the retention of the Acts which protect the livestock market in the town for the benefit of local farmers.

\* **Eligibility.** You are eligible to vote if you are a farmer and/or a user of Abergavenny livestock market.

Your name, address and signature must be filled in below for your vote to count.

**A YES vote supports the above petition**

**A NO vote opposes the petition**

**YES**

Put a **X** in the box  
to record your vote

**NO**

A **YES** vote is for keeping  
the livestock market on its  
present site in town

A **NO** vote is for a new  
livestock market at  
Bryngwyn near Raglan

Print Name: .....

Print Address: .....

.....

..... Post code: .....

**I am a farmer and/or a user of Abergavenny livestock market.**

**Signed:** .....

This opportunity to vote has been arranged by KALM, whose aim is to keep Abergavenny livestock market and to restore it to a modern facility, possibly in stages over a number of years, using grants and voluntary private investment. A stage-by-stage modernisation would ensure the uninterrupted use which farmers require.

A NO vote indicates that you favour the County Council plan for a new livestock market provided at public expense at Bryngwyn in open countryside with no shops, services and amenities.

KALM undertake to deliver all eligible votes to the NAW Petitions Committee.



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

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## **WRITTEN STATEMENT BY THE WELSH ASSEMBLY GOVERNMENT**

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**Title: Bovine Tuberculosis Order under the Animal Health Act 1981**

**Date: 30 September 2009**

**By: Elin Jones, Minister for Rural Affairs**

TB in cattle is one of the biggest threats facing the dairy and beef industry in Wales. Last year over 12,000 cattle were culled because of the disease, and nearly £25 million spent in compensation. This year alone around 8,000 cattle have been slaughtered, compared with just over 7,000 at the same time last year. By 2014 the cost to the taxpayer could be £80m, if we do nothing.

We have established a comprehensive programme to eradicate bovine TB. The majority of the programme is concerned with measures aimed at stopping cattle from spreading the disease.

TB Health Check Wales, an initiative to test all cattle herds in Wales before the end of December is ahead of schedule and has succeeded so far in identifying nearly 100 new herd breakdowns that may not have been discovered for another four years. All cattle herds in Wales will also be tested again in 2010.

In less than a year, we have also dramatically reduced the number of overdue tests pre Health Check Wales by over 97% from 711 tests to 18.

Later this term I intend to consult on draft legislation which would include changes on compensation for bovine TB and Pre Movement Testing exemptions. We are also developing policies in relation to other TB susceptible animals, namely camelids and goats.



But we cannot ignore the reservoir of disease that exists in our wildlife. If we are to eradicate the disease we must have an effective wildlife strategy.

From the outset I have made it clear that I will only sanction a badger cull as part of an overall programme to eradicate TB, if the available evidence shows that it can make a contribution to reducing TB in cattle.

In March 2009 I announced, on the basis of the available evidence, that I was still of the view that a badger cull was necessary to eradicate TB in an Intensive Action Pilot Area and that I intended to bring forward and consult publicly on secondary legislation that would allow the Welsh Assembly Government to implement and manage a cull. That consultation on a draft Order also asked the public for their views on the powers needed to implement an effective badger vaccination strategy when it becomes practical to do so.

The consultation started in April and lasted for 14 weeks, longer than the standard Welsh Assembly Government consultation. I also published the relevant evidence on our website.

There was widespread interest in the consultation. Of the 741 responses that directly answered the questions, 54% of the respondents came from Wales, 31% from outside the country and 15% did not provide us with their address.

The draft Order asked six questions, but as expected, the issue of culling as part of a badger control strategy attracted most responses.

Three hundred and seventy three respondents (50%) opposed culling as part of the strategy; three hundred and sixty one respondents (49%) agreed that alongside cattle measures a badger cull could have an impact on TB eradication in endemic areas. 1% did not respond to this question.

Of the Welsh responses 85% agreed that culling needed to be considered as part of a badger control strategy. The majority of respondents who disagreed with culling as part of a wildlife control strategy were from outside Wales, including 42% from outside the UK. 22% did not give their address.

Two petitions, amounting to some four-hundred and eighty seven signatures were also received. An additional one-thousand, one hundred and eighteen e-mails were received, which although relevant to the content of the consultation, did not directly refer to the consultation or answer any of the questions asked.

The majority of respondents agreed that the Welsh Assembly Government was the most appropriate body to deliver a badger cull. They also agreed that we should be allowed powers of entry to implement an effective vaccination strategy in the future.

Following the consultation and consideration of the responses submitted, I am still of the view that a badger cull in an Intensive Action Pilot Area is necessary as part of our programme to eradicate bovine TB. Today I am laying the Tuberculosis Eradication (Wales) Order 2009 before the National Assembly. This Order provides the legislative powers for a government managed wildlife strategy, which includes culling and vaccination. However, this legislation does not of itself mean the start of a badger cull.

Before I make a final decision on an Intensive Action Pilot Area, there are further steps that need to be taken.

I have always said that any cull of badgers could only go ahead when all preparatory work is complete. This Order is an important step towards completing that work, providing the necessary legal powers for a Welsh Assembly Government managed cull.

Work is well underway to assess the possible environmental impact of a cull on the area of the proposed Intensive Action Pilot Area, and we continue to consult with the Countryside Council for Wales. We have also been working over the Summer in the area, to make sure that it will, as far as possible, satisfy the Independent Scientific Group minimum criteria for a successful cull.

The outcomes of this work will inform my final decision on whether to proceed with a cull. I will update you on the next steps in due course.

I would like to remind Members that we do not intend to kill all badgers in Wales, but to eradicate a debilitating and infectious disease. Any cull would be targeted in an endemic area and carried out humanely. Our ultimate goal is a population of healthy cattle and healthy badgers. The badger remains a protected species and any illegal actions must be reported to the police.

Assembly Members can view the responses to the consultation at [www.wales.gov.uk/bovinetb](http://www.wales.gov.uk/bovinetb)

**Ieuan Wyn Jones AC/AM**  
Dirprwy Brif Weinidog /Deputy First Minister



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

Eich cyf/Your ref: PET-03-227  
Ein cyf/Our ref: DFM-05043-09

Sandy Mewies AM  
Temporary Chair  
Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

*Dea Sandy*

28 September 2009

Thank you for your letter of 15 June 2009 inviting my comments on the petition submitted by residents of Llanmaes village against aspects of the proposed St Athan development scheme. Please accept my apologies for the delay in responding to the Committee. However, I wanted to ensure that the Petitions Committee received a considered and detailed response to the points raised in the petition.

I should point out that the Ministry of Defence (MoD) is responsible for the housing element of the proposed development and I note that you have sought their comments. My response therefore deals with the issues connected with the proposed Northern Access Road.

Firstly, let me say that I do understand the concerns of local residents. The project partners – the Welsh Assembly Government, MoD and Metrix - are extremely sensitive to the potential impact of the proposed development at St Athan on the surrounding communities. Involving the community from the outset in the redevelopment of St Athan is a key project priority and the final plans have been shaped through consultation and communication with local people and community representatives.

An extensive programme of pre-planning public consultation on the proposals, involving public exhibitions, workshops (including one on transport), interest group events and public meetings, has been undertaken. These events began last summer and continued through to April this year. This process of community engagement included a public exhibition held last September in Llanmaes followed by two meetings with community councillors this year, one of which involved local residents, to listen to local concerns and to explain how the proposed route of the Northern Access Road has been developed.

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CF99 1NA

English Enquiry Line 0845 010 3300  
Llinell Ymholiadau Cymraeg 0845 010 4400  
Ffacs \* Fax 029 2089 8198  
PS.DeputyFirstMinister@wales.gsi.gov.uk

As regards the new road proposal, traffic studies indicate that the redevelopment of MoD St Athan is expected to generate substantial levels of additional traffic, which will include heavy goods vehicles as well as private cars. It is therefore essential that the two developments – Defence Technical Academy (DTC) and Aerospace Business Park (ABP) – are accessed by roads of appropriate design, specification and construction, and that traffic congestion on the existing local road network and adverse environmental impacts in existing settlements are avoided as far as possible and mitigated where necessary. Detailed discussions have been held with the Vale of Glamorgan Council (in its capacity as local planning authority and highway authority) with a view to ensuring that these objectives are met. Given the size and nature of the development proposals, the creation of a high quality link to the existing classified network – in this case, route B4265 – is considered essential.

In considering the redevelopment of MoD St Athan, the Welsh Assembly Government investigated a number of options for accessing new development on the site. This culminated, in 2006, in the outline proposals contained in the *St Athan Development Brief*, which, following public consultation was approved by the Council and adopted as the basis for the determination of planning applications. The access proposals set out in the *St Athan Development Brief* included the construction of a new Northern Access Road, to run from a new junction on the B4265 and to serve as the principal access to both the DTC and the northern part of ABP; this new road was characterised in the report as a new “*direct and separate access onto the main road that bypasses both Llantwit Major and St Athan*”;

In considering access options, the project team has been guided by four basic principles:

- first, the necessity to maintain the national and local security of West Camp for the MoD;
- second, the requirement to deliver an enhanced ABP to accommodate the Welsh Assembly Government’s proposals;
- third, the necessity (strongly promoted by the Council) to avoid extraneous traffic passing through St Athan village; and
- fourth, safety aspects concerning airfield airside access and runway operation.

These four basic principles have been supplemented by other considerations, including those related to environmental, engineering, safety, etc factors.

As explained above, a range of access options were explored as follows:

- Access from the north
  - Northern Access Road
  - Eglwys Brewis Road
- Access from the south
  - Tunnel under the runway
  - Tunnel under the western end of the runway
  - Southern access east of the runway
- Access from the east
  - St Athan eastern bypass
  - St Athan inner bypass
- Access from the west
  - Access through West Camp.

With the exception of the last – access through West Camp – all these options were considered by the Welsh Assembly Government (or the WDA) in the period between 2003 – when negotiations commenced to acquire the site from the MoD – and 2009. The proposal for access through West Camp arose during public consultation, in March 2009, and was rejected after preliminary assessment for the reasons set out below.

#### **Consideration of options: access from the north**

At an early stage, consideration was given to whether access could be provided by means of upgrading Eglwys Brewis Road or building a new access road roughly parallel to it (the Northern Access Road). The upgrading of Eglwys Brewis Road was considered unacceptable, principally on environmental and construction phasing grounds

#### **Consideration of options: access from the south**

All three of these options include a new bridge over the railway; two also include a tunnel under the runway. Unlike the proposed Southern Access Road – which is intended to serve ABP South only – all three options would provide access to both DTC and ABP. The project partners have substantial concerns about the operation and effects of such an arrangement. The tunnel options have been dismissed on a number of grounds, including: construction, maintenance and operational issues; affordability; and security and public safety (tunnel under an operational runway). The construction of a new bridge over the railway could pose phasing difficulties, as it would need to be in place at an early stage to facilitate construction access and to serve the DTC development on opening. (This does not apply to the Southern Access Road to serve ABP South, as that access does not serve DTC and is not critical to its implementation and opening.)

#### **Consideration of options: access from the east**

Both options include an on-line improvement of and a new junction on the B4265, and multi-span bridges over the Rills Valley and St Johns Valley respectively. It is considered that both options would have significant environmental impacts. In addition, neither option provides access to ABP South and, hence, an additional access would be required for that, as would improvements to provide access to SFA sites.

#### **Consideration of options: access from the west**

It was suggested during public consultation that a new access be constructed from the B4265 from the west through West Camp, instead of the currently proposed Northern Access Road. Such a scheme would not obviate the necessity for the Southern Access Road.

An access through West Camp is technically feasible, but is unacceptable to MoD as it would prejudice national and local security, and the efficiency, viability and operation of the existing West Camp through adverse impacts, including: loss of buildings, reduction in buildable footprint and additional security requirements to accord with national counter terrorism measures.

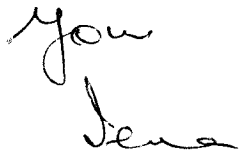
The Welsh Assembly Government cannot support the loss of developable land within the ABP which would adversely affect the economic viability and efficiency of its proposals. Introduction of new through traffic into the ABP would allow public access into secure zones, create security and health and safety issues (that is, access to airfield airside and FOD (Foreign Objects & Debris) hazards). Nor can the Welsh Assembly Government support activities that would infringe the safeguarding of the airfield.

The MoD, Metrix and Welsh Assembly Government consider that an access through West Camp would introduce unmanageable phasing difficulties for the DTC and ABP as there would be a need to construct a new railway crossing to enable the main site construction activities to commence. Any new crossing would require the formal approval of Network Rail and would result in considerable delay to the project through negotiation and construction of the new bridge. A West Camp access would also require separate improvements to existing road infrastructure to serve proposed SFA sites.

My officials have also considered a further suggestion submitted by a local resident which proposes an alternative access off the B4265 south of the existing West Camp access. This too, I am afraid, is not a practical solution. The reasons are set out in the attached detailed response from the joint project team to the Vale of Glamorgan Council Planning Department. The Petitions Committee will find it useful as it deals with the objections from Llanmaes Community Council.

I trust the above demonstrates the efforts made by the project team to engage the local community at all stages and importantly that a number of options were explored prior to the conclusion being reached that the proposed Northern Access Road will provide the most appropriate means of serving the re-development site.

In conclusion, this is a major and complex project which has involved a wide range of work over a considerable period before firm proposals were submitted to the planning authority in May this year. It is now for the Vale of Glamorgan Council to consider all the factors under the statutory planning process before arriving at its decision. The views expressed during the public consultation have been passed to the local authority as part of planning application. They have also been made aware of this petition.



**Ieuan Wyn Jones**  
Gweinidog dros yr Economi a Thrafnidiaeth  
Minister for the Economy and Transport

**Adran yr Economi a Thrafnidiaeth  
Department for the Economy & Transport**



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

Rob Thomas  
Head of Planning & Transportation  
The Vale of Glamorgan Council  
Dock Office  
Barry Docks  
Barry  
CF63 4RT

**For the attention of Steve Ball**

Eich cyf \* Your ref A056467

26 August 2009

Dear Sir

**Defence Technical College, St Athan  
Application no. 2009/00500/OUT**

**Aerospace Business Park, St Athan  
Application no. 2009/00501/OUT**

I refer to your letter of 6 August 2009, addressed to Entec and WYG as agents respectively for the above planning applications, together with the several enclosures comprising a letter dated 24 July 2009 from the Clerk to Llanmaes Community Council and three letters dated 26 July 2009 from Mr D R S Harris of Old Froglands. This letter is intended as a composite reply to all these letters and the issues are dealt with in the same order as set out in the Clerk's letter.

Please note that the responses in respect of Service Families' Accommodation and noise from shooting and explosives apply to the DTC application only.

**1) NORTHERN ACCESS ROAD (NAR)**

The proposed NAR leading from the B4265 conforms to the proposal set out in the *St Athan Development Brief*, which was formally adopted by the Council in 2006 following public consultation. Development of the scale envisaged requires a vehicular access of appropriate design and capacity. Contrary to the Community Council's assertion, neither

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INVESTOR IN PEOPLE**

Ystafelloed Marchnata • Marketing Suite  
Adeilad 303, RAF St Athan • Building 303, RAF St Athan  
Y Barri, Bro Morgannwg • Barry, Vale of Glamorgan  
CF62 4AD

Ffôn \* Tel 01446 753020  
Ffacs \* Fax 01446 753021  
nicky.bailey@wales.gsi.gov.uk  
Typetalk UK - 18001 08457 75577

Eglwys Brewis Road nor the road through St Athan village is suitable to serve as a principal means of accessing the developments. In accordance with the Council's requirements, the NAR and its junctions have been designed to discourage access from the east, via St Athan village.

Its new junction at the B4265/Northern Access Road will require 'local' widening only to provide on and off 'slip lanes' to cater for the new traffic movements from the B4265 on to the new NAR as shown in the drawings included within the planning applications. It is not proposed to widen any other part of the B4265 along this length. There is one element of the B4265 which will be straightened, at Gileston/Old Mill, in order to improve the alignment of this section of highway primarily to improve road safety for all users.

The Community Council's assertion that the development is unsustainable is refuted. Single Living Accommodation (SLA) is located on site, such that those living there will be able to access the DTC entirely on foot or by cycle. Service Families' Accommodation (SFA) is located close to the DTC, within walking/cycling distance, and the strict control of parking permits will ensure a high degree of travel to work from SFA by non-car modes. The Northern Access Road includes a combined footway/cycleway to improve linkage between the proposed development and Llantwit Major encouraging sustainable travel, providing an important route to schools, and creating linkage to Llantwit Major train station. The proposed highway works associated with the schemes will also ensure safe routes from Llantwit Major and St Athan to the proposed sports facilities at Picketston.

The possibility of constructing a new railway station at St Athan was considered, but was discounted as unnecessary and uneconomic. Llantwit Major station is readily accessible from DTC and ABP and the proposals include for a dedicated shuttle bus, and "white fleet" transportation between the DTC and both Llantwit Major and Bridgend stations.

The Community Council and Mr Harris propose an alternative access off the B4265, south of the existing West Camp access. Consideration has been given to the effects that such an arrangement would have on the proposals and, for the reasons set out in Appendix C to the *DTC Planning Statement*, Paragraphs 424 - 428 of the ABP Planning Statement and Section 2.2.3 of the Environmental Statement, which include national and local security, loss of buildable footprint, viability, efficiency, loss of buildings, additional security and timing, it would not be appropriate to provide a public access road to the DTC and ABP through West Camp.

Notwithstanding the above, there are two fundamental issues that negate such a proposal. Firstly, it has already been confirmed that West Camp (which includes the area known as Llantwit Road) is and will remain for the foreseeable future in active military use. It is a secure, protected environment. Secondly, in conjunction with the above, the requirements for operational airfield regulations sterilise large areas of land adjacent to the runway from any form of infrastructure and or development. The combination of these two issues alone therefore renders any form of access at this location unacceptable.

The Llanmaes Community Council maintain that inadequate local consultation has taken place in respect of the proposed route of the access road when it was initially suggested in the development brief. The Community Engagement Statement (Camargue 2009) submitted with the planning applications details the extensive public consultation which has taken place in respect of the proposals.

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A public exhibition outlining the proposals (including the proposed location of the NAR) was held between 4-6 May 2006, following the distribution of newsletters to 20,000 local residents. This was then followed by public consultation including a further exhibition held by the Vale of Glamorgan Council prior to adoption of the St Athan Development Brief in July 2006. Subsequently the applicants undertook extensive public consultation over a ten month period between July 2008 and July 2009, involving two five day public exhibitions, two workshops and two interest group sessions and full responses to all questions raised at these via the web-site [www.st-athanconsultation.co.uk](http://www.st-athanconsultation.co.uk)

Reference is made in the Community Council objection to the proposed B4265 junction as being dangerous and inefficient and to a potential accident blackspot adjacent to Froglands Farm. The new junction of the B4265 and the NAR is a signal controlled 'y' junction with merge and diverge lanes and it is confirmed that it has been designed in accordance with the relevant Guidance Notes and Highway Standards to suit the capacity required. This junction has, and will be, subject to a series of Road Safety Audits to ensure the safety of all of the users will be maintained.

The junction of the new link from the NAR to Froglands Farm is located within an area that is subject to a 30mph Order and has been designed to provide full visibility splays to the required standard in either direction. In addition, a right turning lane is to be provided for those vehicles turning right off the NAR toward Froglands Farm thus offering further safety provisions. All of the Northern Access Road proposals have been developed with VoGC Highways and alignments have been developed with their assistance.

With regard to the Community Council's comment regarding emergency vehicles and the residents at Millands Park and Froglands, the existing Fire Stations are at Llantwit Major and Cowbridge with existing Police Stations at Cowbridge and Barry. Millands Park and Froglands will be served by a new junction off the NAR which will provide a quicker and easier access for all emergency vehicles than currently exists.

## **2) SERVICE FAMILIES' ACCOMMODATION (SFA)**

### **Quantification of the SFA**

The vast majority of military personnel at the DTC will be accommodated in the Single Living Accommodation (SLA) being provided as part of Metrix's proposals within the security fence with around 3000 bed spaces being provided within the DTC itself. The SLA is provided to accommodate single and married service personnel who do not bring their families to St Athan.

The main driver for SFA is from military staff posted to St Athan for periods up to 3 years. Additionally but to a much lesser extent military trainees on long courses (6 months+) may be entitled to a Married Quarter. The requirement for SFA is impacted by a number of variables, such as proximity of other military units (e.g. A Sailor is more likely to purchase his or her own house in or around Portsmouth or Plymouth where they could be spending most of their career), and the number of married servicemen and women who are entitled to a Married Quarter as part of their conditions of service. Some service personnel prefer to live in Single Living Accommodation (SLA) and commute weekly to their own home but these factors will vary by military unit and over time

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The requirement for 553 SFA to support the DTC was derived by MoD from an analysis of historical data from existing MoD training establishments. This looked at the existing provision for SFA across these establishments and calculated how much will be required when they are co-located at St Athan. This analysis was also used to identify levels of need for different types and sizes of dwellings. The requirement for 553 SFA was reduced to take account of the expected availability of 70 existing SFA at St Athan. This left a requirement for 483 new dwellings to be constructed.

In a similar approach to that taken for other elements of the DTC, the requirements for both SLA and SFA have been developed and reviewed over time before they were confirmed. This was to ensure that they meet levels of need. The provision of SFA is costly and the MoD always seeks to minimise the risk of overprovision. This can at times lead to a shortage of SFA in a particular area and, when this occurs, substitute SFA (i.e. renting suitable accommodation on the open market) is sought to overcome short term peaks in the requirement.

### **Changes from the Development Brief**

The *St Athan Development Brief* assessed the SFA requirement as 815 units and proposed a single area of SFA housing at the stadium/golf course. The overall SFA requirement was later reduced by the MoD to 553 units, of which 483 new build units are proposed. Subsequent investigation showed that a large part of the stadium/golf course site lay within the aerodrome safeguarding zone and could not be developed for housing. The effect of this was to reduce the capacity of that site to 172 units only. It was therefore necessary to make alternative provision to satisfy the functional requirement for SFA to service DTC.

### **Use of greenfield land**

It is accepted that preference should be given to the use of previously developed or "brownfield" land and part of the stadium/golf course site falls into that category. However, there is no absolute restriction on the use of greenfield sites and, in all cases, a balance has to be struck. There are no large, suitable brownfield sites within walking or cycling distance of St Athan. The use of sites close to the DTC, albeit on greenfield land, has a number of significant benefits and allows for sustainable access, especially where, as in this case, the developer is able to control access to the DTC by private vehicles. All the proposed SFA sites lie within the development boundary on the Council-approved *St Athan Development Brief*.

### **SFA buy-back clause**

Reference is made in the letter from Llanmaes Community Council to a buy-back clause which would allow the MoD to acquire existing houses in the St Athan area. MoD has confirmed that no such buy-back clause exists and that MoD has no right to acquire houses sold by Annington Homes into the private sector.

### **Candidate sites for housing**

As prudent forward planning, in February 2008 the MoD put forward candidate sites as part of the process of preparing the *Vale of Glamorgan Local Development Plan*, whilst also considering other sites in the area for potential housing development including, for example, infill plots within the Annington Homes areas of housing. An assessment of sites suitable for

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SFA was carried out by WYG leading to production of a final Site Selection Report (WYG March 2009) which is appended to the DTC Planning Statement (Entec May 2009). Both West Camp candidate sites were considered as part of the study and the Welsh Assembly Government expressed reservations at the time about their developability/suitability for new housing.

In the case of the West Camp (South) site aeronautical constraints arising from proximity to the runway render almost all of the site undevelopable. In the case of the West Camp (North) site, mindful of the situation at Cardiff Airport where the presence of housing immediately adjacent to the airport boundary gives rise to complaints, the Welsh Assembly Government advised MOD of its view that it would be potentially incompatible for new housing to be located immediately adjacent to the existing ABP which it intended to redevelop over a 20 year period involving the submission of further planning applications on a phased basis.

At the same time as WYG were examining future potential SFA sites considerable work to develop proposals for the layout and arrangement of development and positioning of activities within both DTC and ABP was also being undertaken. At the time of writing of the final SFA Site Selection Report these matters had not been finalised and assessment work was not in fact completed until shortly before the submission of the planning applications and Environmental Statement in May 2009. The wording in the Site Selection Report describing West Camp (North) as 'unlikely to be acceptable for housing on environmental grounds' reflects an early assessment of possible issues which in hindsight should have been amended in the submitted planning application documents, particularly in the light of future development proposals for West Camp.

In parallel with the housing site examination carried out by WYG, MoD had been considering the future use of West Camp and during 2008 decided that the whole West Camp site was to be retained for operational purposes, notifying the Welsh Assembly Government in Spring 2008 of the proposed future boundary fence position for an enclaved West Camp which included most of the area which had been proposed for housing as a candidate LDP site.

As part of this process MoD informally advised Vale officers that it was no longer considering these sites and has formally withdrawn both of the West Camp candidate sites from the LDP process.

Work on erecting a fully secure fence separating West Camp from ABP commenced on site in late 2008 and has now been completed.

A rolling programme of replacement of accommodation blocks and provision of new facilities representing considerable investment in West Camp has commenced, the first of a series of planning applications being lodged with the Vale of Glamorgan Council on 20 February 2009.

### **Alternative Housing Locations**

Llanmaes Community Council proposes that if the proposed housing cannot be accommodated within the camp then other brownfield sites, such as Llandow should be considered, possibly for the construction of a university style hall of residence or that the

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proposed location for the sports facilities be used for housing. David Harris suggests in his letter that the SFA and Sports pitches could be swapped.

SFA is provided to a national standard set out in MoD Joint Service Publications and a university style hall of residence would not be appropriate to meet this need. Extensive student accommodation is already included within the proposals for development inside the DTC. Llandow is currently a speculative proposal for private sector housing and is not so well related to St Athan and the DTC as the current planning application proposals,

The DTC is designed to create the most effective training provision and it is a key requirement to have sports pitches and external training areas integrally related as far as possible to ensure that the most efficient course scheduling and training days can be provided within a military ethos environment. An estate which is designed to deliver the most efficient training day is at the very heart of the Defence Rationalisation programme, and will result in highly effective course delivery maximising the throughput of trainees, and realising tangible financial benefits to the MoD. Close proximity of all the training elements of DTC is therefore essential since this promotes sustainability and facilitates the security of military trainees. Locations which are more remote from the core of DTC do not achieve the same benefits.

The proposed location of the Sports facilities has also been carefully considered to balance the needs of the training provision with a location which can be both secure for military use, yet open and accessible to the public without the need for extensive physical, or operational, security controls.

Llanmaes Community Council also proposes the relocation of Picketston FTA to a 'more appropriate MOD location' (suggesting under Item 3 of their letter, otherwise answered below, that FTA and the Firing Range should be relocated to an existing training area such as Salisbury Plain) to enable SFA to be located in its place.

The location of the Picketston FTA, (also incidentally involving greenfield land), has been carefully considered and selected to ensure that the entire common military skills elements of the college are located together, including the firing range, military training wing, respirator training facility, obstacle course, and PAAB in order to deliver training in the most efficient and secure manner. For the reasons given here and above it would not be appropriate for these elements of training to be relocated to an area such as Salisbury Plain.

### **Coalescence**

The applicants have no intention to develop land between the NAR and Llanmaes and, hence, the issue of coalescence or ribbon development does not arise. Even with the development proposed, there will be a substantial gap between Llanmaes and the NAR.

The Environmental Statement (ES) landscape character assessment recognises the importance of the landscape setting of the Llanmaes Conservation area and describes in detail both the conservation area characteristics and its setting, with the pastoral fields and paddocks along the shallow valley of the Llanmaes Brook with the overall small scale enclosure pattern and scale to the landscape south of Llanmaes.

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The ES assessment concludes that whilst the views from the southern approach to Llanmaes will change, the other characteristics of the village conservation area will not be affected and the pastoral nature of the Llanmaes Brook valley will be retained.

### 3) NOISE FROM SHOOTING AND EXPLOSIVES

Mr D Harris and Llanmaes Community Council refer to noise arising from the new Picketston Firing Range and FTA.

The assessment of noise effects from the proposed Picketston firing range and Picketston FTA is based on guidance contained within "*Clay Target Shooting: Guidance on the Control of Noise, 2003*". This guidance document is based on research undertaken by the Building Research Establishment (BRE) and the suggested noise limits it contains are based on the likelihood of annoyance arising from various shooting noise levels. It provides standardised methodology for the measurement and assessment of noise from clay target shooting at residential dwellings.

The noise limits agreed with Vale of Glamorgan Council (VoGC), as used for assessment in the Environmental Statement (ES), are also based on the clay target shooting guidance.

The assessment carried out within the ES has therefore focused on the effects on people, rather than domestic or farm animals, although, as an example, recreational shooting is commonplace in many rural communities without negative effects occurring on domestic or farm animals. After an initial period, it would be expected that animals in the surrounding areas would become acclimatised to any noise disturbance, as indeed may already be so due to the current activities on the site.

During consultation with the VoGC, an upper noise limit of Shooting Noise Level (SNL) 65dB was considered appropriate for the assessment of magnitude of effects within the ES. The assessment undertaken within the ES concluded that all predicted LAFmax noise levels from Picketston firing range were within the noise limit of SNL 65dB. Taking into account the medium sensitivity of the nearest receptors, the ES concluded that there are no significant noise effects with the likely level of noise that will result from the proposed firing range. The ES noted, however, that during armament testing, which is to be typically two or three times a month, there is the potential for a higher level of noise on New Barn to the north of the range. However, given the infrequent occurrence of armament testing, it is considered that this would not be a significant effect.

The ES also concluded that predicted LAFmax noise levels for Picketston FTA comply with the noise limit of SNL 65dB. However, New Barn and approximately eight other properties to the north of the FTA are predicted to experience noise levels slightly in excess of LAFmax 65dB. When this high magnitude of effect is considered alongside the medium sensitivity of these receptors, the ES determined that significant effects are likely at these properties. It should be noted, however, that the existing measured average daytime LAFmax noise levels in this area are 1dB higher than the predicted modelled noise levels from the proposed Picketston FTA

In order to mitigate noise effects associated with Picketston Firing Range and the FTA, a number of environmental measures have been included within the development proposals. These include no blank or live firing at night-time (2300-0700) (where possible), acoustic

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bunds for screening Picketston activities, blank firing only when necessary for demonstration purposes, the complete enclosure of Picketston firing range, and minimum 3m-high acoustic fences/barriers between the FTA and the Picketston site boundary.

It is recognised by the applicant in respect of DTC that the noise generated from these activities is of concern to many of the residents in the area, and in particular the frequency of use of the proposed firing range. The range is an essential element of the DTC and the location essential to the efficient delivery of training. However, following further review the applicant is in a position to confirm that the envelope of use stated in the planning application can be refined as follows:

- Range use to be 0830 to 1730. Use outside these hours to be agreed with the local Community Councils in advance. (As currently the case at West Camp)
- Maximum weekly use to be restricted to 5000 rounds

In respect of the effectiveness of bunds and fences in dealing with low frequency noise, the computer noise model took into account low frequency noise (as presented in Appendix EE of the Environmental Statement). The dominant frequencies from shooting are actually 1 to 2kHz, which are not considered to be low frequency. The noise model uses the calculation methodology in the international standard ISO 9613 which provides a method for predicting noise propagation in the frequency bands 63Hz to 8kHz. The method takes into account the differing performance of a barrier for different frequencies and, hence, all frequency bands, including those at low frequencies, are given proper consideration in the noise model and Environmental Statement.

#### **4) OTHER POINTS**

##### **Loss of residential amenity**

The letter from Llanmaes Community Council alleges that the NAR will run within 15 metres of Milllands Caravan Park. This is incorrect: at its closest the nearest edge of the kerblines of the NAR is over 65 metres from the caravan park.

The NAR has been designed to ensure that it follows the existing profile of the topography as best as possible to minimise the extent of earthworks required. It will in general be around 1500 to 1700mm above existing ground level as it passes south of Milllands Park, reducing to 1000mm at Froglands Farm. The Llanmaes Brook sits in a dip or valley some 7 metres below the surrounding topography and again the finished level of the carriageway at the bridge is approximately 1500mm above the surrounding topography.

The new road will be lit along its entire length with overhead lanterns placed on columns. These lanterns have been designed such that the 'beam' of light provided is restricted into the form of a 'downlight' rather than a 'spread' of light that is found on some older forms of lantern. In addition, if it is felt necessary by the Local Authority to provide even more restriction to potential side glare then the provision of baffles will be investigated.

Detailed photomontages of the views from Llanmaes and Milllands Park toward the NAR have been undertaken and are included within the Planning Application Documentation. The design of the NAR includes for landscaping and mitigation and these photomontages show the limited visual intrusion that will exist after construction of the NAR and in 15 to 20 years after opening.

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Initially, Eglwys Brewis Road will be used as a construction access until construction traffic can use the NAR and permanent improvement works are planned to cater for construction traffic over this limited period. After it is available, the NAR will provide a more appropriate route for construction traffic than either Eglwys Brewis Road or the road through St Athan village.

Llanmaes Community Council suggests that the combined noise impacts of the development (FTA, Sports Pitches, Aircraft, Engine Running, NAR) will have an unacceptable impact on the residential amenity of Millands Park.

Whilst the ES acknowledges that the proposed development will inevitably result in increased traffic noise at Millands Park from traffic that would use the proposed NAR, the level of noise emanating from the new road would be mitigated due to the provision of an earth bund of at least 1 metre in height along the northern side of the NAR (as set out in Table 16.61 of the ES and as shown on drawing 003622/PA/165). The noise levels that will be experienced at Millands Park are by no means unrepresentative of typical noise levels experienced by many residential properties across the country and are, for example, well below those levels that would warrant any special measures to be considered for protecting the amenities of the dwellings, such as any requirement for statutory noise insulation grants.

It should also be noted that the existing noise levels experienced by Millands Park from the current West Camp firing range are higher than the predicted noise levels that are expected to emanate from the proposed Picketston firing range and field training area. Again, Table 16.61 of the ES refers to various environmental measures that form part of the proposals that will mitigate the potential noise levels arising from the Picketston area. Whilst the Millands Park location is expected to experience an increased predicted cumulative level of noise (i.e. from all sources) as a result of all of the current planning application proposals being eventually implemented, this would still be at a level that would not be regarded as having an "unacceptable impact on their residential amenity.

Discussions have taken place with the owners of Rose Cottage, and Froglands, which are the closest dwellings to the NAR, with a view to mitigating the impact of the proposals on those properties.

## **Archaeology**

The effect of the proposed developments on the cultural heritage of the area has been the subject of extensive survey, comprising not only desk-based assessment but also geophysical surveying and trial trenching which is currently proceeding on site. The nature and extent of these surveys have been agreed in advance with the Glamorgan Gwent Archaeological Trust, which is the regional archaeological curator and the local planning authority's advisor on such matters, and whose representative is monitoring the works. An assessment of the likely effects on the below ground archaeological resource (as well as other aspects of the cultural heritage) is contained in the *Environmental Statement* (ES). Subject to the findings of the site surveys currently being undertaken, further and more detailed measures may be required subject to planning conditions imposed on any grant of planning permission.

Specifically, the significance of the archaeology at Llanmaes has been recognised at all stages in the archaeological assessment and has clearly influenced the evaluation strategy. There is regular dialogue and exchange of information with the National Museum of Wales,

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not only on the question of the implications of development on the local archaeology, but also on measures that may address community interests both locally and more widely. The prospect of an Archaeology Advisory Group, first raised by the National Museum, has also been discussed. It remains a possibility, although the appropriate means of convening such a group has not been defined, a point raised with the Museum on which we await further comment.

We have no objection to continuing the dialogue initiated with the National Museum in a wider forum, provided this does not give rise to conflicting roles or otherwise confuse the well established planning arrangements. Such a risk is presented by the Llanmaes Community Council suggestion, since existing arrangements for ensuring the significance of any finds is fully understood and adequately excavated or preserved (opposed to recorded) in situ, is clearly a responsibility exercised by the Vale of Glamorgan Council, assisted by the Glamorgan Gwent Archaeological Trust Curatorial Division and subject to processes of public consultation. The Community Council might wish to give further thought to the purpose and benefits of an Archaeology Advisory Group, perhaps initially in discussion with the National Museum.

### **Visual impact**

The visual impact section of the ES (chapter 8) describes that both Llanmaes and the adjacent public footpaths will experience filtered views of the proposed development and access road. It acknowledges that negative visual effects will occur as a result of the proposals, albeit these are mainly limited to within 1km of the site. The changes associated with the proposed development will be viewed within a context of existing large buildings and structures at West Camp. The presence of existing large-scale development within the view reduces the sensitivity of views to further development and the significance of negative effects.

However, for much of the area around the site, the proposed development of the roads and the housing, will be located on previously undeveloped land. It is recognised that this change will inevitably alter the appearance of those particular areas and the proposed new development includes measures to reduce the visual effects of the proposed development, including site-wide landscaping and habitat enhancement measures that will help to screen aspects of the development as identified in the photomontages.

In respect of the NAR, existing landform and the proposed vertical alignment of the proposed road will provide significant screening. The junction of the NAR with the B4265 takes the form of a signalised 'y', the signalised element of which extends over a length of approximately 100 metres. The remainder of the junction will provide the required merge and diverge lanes to the NAR the full extent of which will involve the removal of an area of existing scrub amounting to just over 400m. This scrub has established on the cutting slopes of the B4265. It contributes to the vegetation pattern of the area, illustrating the effectiveness of planting in mitigating the negative visual effects of roads.

The vertical alignment of the northern access road and its junction with the B4265, and intervening field boundary hedgerows in this location help to ensure effective screening of views from Llanmaes, as illustrated in photomontage no. PM.01-1. In addition, as part of our proposals there will be a significant amount of new landscaping provision at this location to mitigate for the loss of existing vegetation and enhancement of the remaining.

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The valley of Llanmaes Brook provides the opportunity for views towards the northern access road and the proposed bridge over Llanmaes Brook. However, the landform of the valley limits the extent of the area from which views of the bridge are available. Intervening vegetation further limits the extent of views to those broadly along the line of the valley. Existing field boundary hedgerows soften the appearance of the bridge where landform allows views of the bridge; refer to photomontage no. PM.01-1.

The intervening hedgerows, which line the arable and pastoral fields, will provide partial screening, as will the network of hedges which border the local unclassified side roads and lanes. In addition the local topography will generally only allow oblique views towards the proposed development and provide a level of visual separation.

The landscape planting proposals include hedgerows along the northern edge of the Northern Access Road (NAR), with a hedge on bank (giving the appearance of a false cutting) on the section of highway between Llanmaes Brook and Rose Cottage, which will provide increased screening. A gentle slope to the north will enable this area to be returned to agricultural use enhancing its integration into the surrounding landscape. Hedgerow and woodland planting is proposed along the southern NAR boundary adjacent to the Tremains Farm SFA and North of West Camp SFA.

The screening effect of these planting proposals is shown on the photomontage no. PM.02-2 which illustrates the effect of the false cutting and earth modelling to integrate the proposed highway landscape on completion of the works and the further mitigation of the visual impact obtained through the highway hedge planting after 10-15 years.

### **Loss of habitats and biodiversity**

The assertion in the letter from the Llanmaes Community Council that inadequate surveys of protected species have been undertaken is strongly refuted and the quotation referred to is taken (out of context) from the *Ecological Mitigation Strategy*, rather than from the ES.

The Community council state that “*No attempt to evaluate the likelihood of the severity of the development on affected species has been made*”. This is, in fact misquoted from the Ecology Strategy – the full quote stating “*No attempt to evaluate the likelihood or the severity of the impacts has been made within this report as this is considered in the Environmental statement*”.

Page 3 of the Ecology Strategy also states: “*This report should be read in conjunction with Chapter 6 of the Environmental Statement – Biodiversity and the Outline Habitat Management Plan produced for the planning application.*”

In fact, extensive ecology surveys have been carried out on land within and adjoining the application sites, including habitat and protected species surveys. These surveys formed the basis for the assessment of the effects of the development on nature conservation and biodiversity (reported in the ES) and the extensive nature of these surveys has been recognized by the Countryside Council for Wales, which is the Government’s statutory advisor on biodiversity. The CCW has also welcomed ‘*...the commitment to the conservation and enhancement of biodiversity proposed in conjunction with the developments*’ (letter to Capita Symonds dated 23 July 2009).

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The effects of the proposed development have been carefully assessed and, where appropriate, extensive mitigation and enhancement measures are proposed. These are documented in the *Ecology Mitigation Strategy* (Capita Symonds 2009) and include proposals in respect of great crested newts, bats, dormice and other species. The mitigation measures are the subject of ongoing discussion with CCW and, in the applicants' opinion, the mitigation proposed as part of these schemes is exemplary. In addition to planning controls, protected species licences will be required before relevant works may proceed.

## **Flooding**

Only a small part of the application sites fall within Zone C on the development advice maps that accompany *TAN 15: Development and Flood Risk*. Both applications are accompanied by a comprehensive *Flood Consequences Assessment* (Entec 2009), a *Surface Water Drainage Strategy* (Pell Frischmann 2009) and a *Foul Water Drainage Strategy* (DCWW 2009) and the applicants are satisfied that the proposed developments can be implemented without exacerbating flooding in the area. The Environment Agency Wales is the Government's statutory advisor on flood risk matters and a statutory consultee for these applications. The EA (letter dated 30 July 2009) has confirmed that it is satisfied with the FCA and does not object to the planning applications.

Llanmaes Community Council suggests that the proposed development will increase traffic from the Llantwit Major Waste Water Treatment Works (WwTW) to the treatment works at Ewenny. DCWW has advised that, currently, the thick sludge residue from the Llantwit Major WwTW is tankered, approximately four times per week, to DCWW's Pen y Bont WwTW in Ewenny (or Cilfynydd WwTW as available capacity dictates) for further treatment. DCWW's proposed improvements at Llantwit Major WwTW, to accommodate the St Athan developments, include a dewatering plant to reduce the sludge to a "cake" with an overall volume less than the volume of the currently produced sludge. The "cake" will require no further treatment and will be transported in skips from the WwTW to landfill. The frequency of skip movements is expected to be no greater than the current movements of tankers. Consequently there will be no increase of traffic generated by the operations of the WwTW.

## **Change of character of the area**

It is accepted that the development, when implemented, will result in some change in the character of the area. However, this should be seen in the following context. First, the site has been in military use since 1938 and, historically, accommodated a much larger military population than it has in recent years. Secondly, noise from aircraft in flight and engine testing has been a constant feature of the area and, until recently, included extensive use by military aircraft. Thirdly, even before the advent of the current proposals, the statutory development plan for the area (the *Vale of Glamorgan Unitary Development Plan 1996-2011*) identified MoD St Athan (and some adjacent land) as an existing employment site and, in principle, favoured its further development.

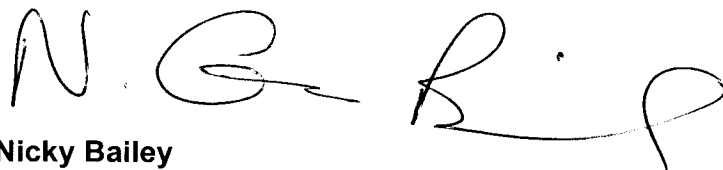
More recently, the *Wales Spatial Plan* has identified St Athan as a strategic opportunity area and this is reflected in the Council's own strategy for the *Vale of Glamorgan Local Development Plan*, which identifies St Athan as a "key development opportunity". Fourthly, in the opinion of the applicants, the benefits of attracting the DTC to St Athan outweigh any

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local adverse effects. The DTC and ABP proposals offer an unrivalled opportunity to attract major investment to the Vale of Glamorgan and to Wales which will not only create new jobs but also investment in training, infrastructure, facilities and the environment. The range of community facilities which will be made available will also offer the community substantial benefits.

We trust that you will take these comments into account when you are considering the objections and other representations made by the Llanmaes Community Council and by Mr Harris.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Nicky Bailey'. The signature is fluid and cursive, with the first letter 'N' being large and prominent. The rest of the name is written in a more compact, flowing style.

**Nicky Bailey**  
**Head of Planning**  
**Department for the Economy and Transport**