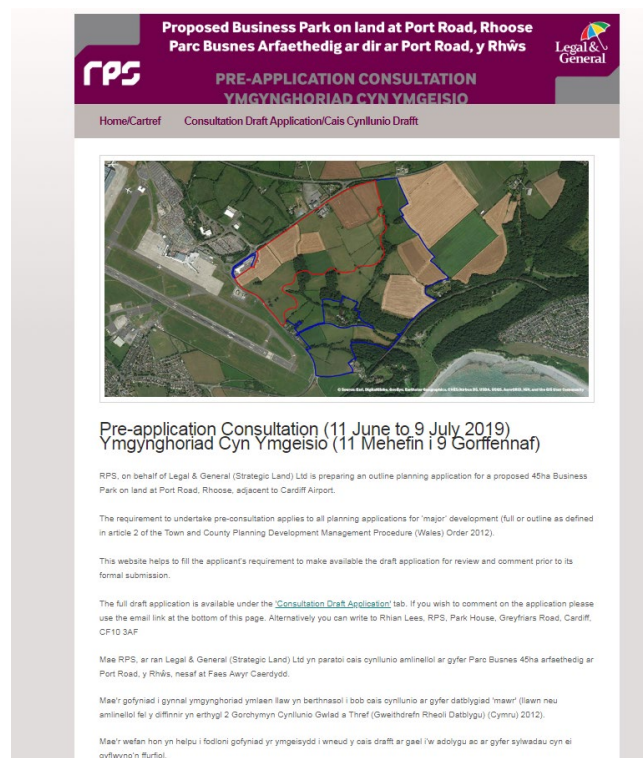


Adjoining Owner/Occupier and Community Councillor Notices

- 2.10 A Schedule 1B Notice Letter was sent to 23 occupiers/owners of land adjoining the development site and ward members on 11th June 2019. A list of those properties and Councillors notified, together with a copy of the notices and letters sent is included at **Appendix F**.

Availability of Draft Planning Application

- 2.11 A dedicated website for the proposed development was set up and hosted at www.pbpc-consultation.cymru as seen in the screenshot below. The website was live from 11th June 2019.



- 2.12 The website's homepage contained a detailed description of the proposed development, together with a link to all of the draft planning application documentation including the application forms, site location plan and parameter plans, Planning Statement, Design and Access Statement and technical surveys and reports relating to ecology, built heritage, archaeology, sustainable drainage, trees, landscape and visual impact, transport, air quality and ground conditions.
- 2.13 During the period 11th June 2019 to 9th July 2019 the website was viewed 1,202 times. 81% stayed between 1 and 60 seconds, 16% stayed between 1 minute and 10 minutes and 3% stayed for 10 minutes or more. The average length of stay was 1 minute and 3 seconds.
- 2.14 Hard copies of the application documentation were also placed in Rhoose Community Library and Barry Library on Saturday 15th June 2019 and removed on Wednesday 10th July 2019. Feedback forms were also provided to Rhoose Library.
- 2.15 The website also had a link button which allowed visitors to comment directly to info@pbpc-consultation.cymru on the development proposals.

Specialist Consultees Consultation

- 2.16 Developers are also required to undertake pre-application consultation with 'specialist consultees'. The following were consulted on 11th June 2019:

- Natural Resources Wales

- Cadw
- Dwr Cymru Welsh Water
- Vale of Glamorgan Council as the Highways Authority
- Welsh Government Agricultural Land Classification division

2.17 An example of the letter sent is included at **Appendix G**.

Requirement for Environmental Impact Assessment

2.18 A Screening Request was submitted to the Vale of Glamorgan Council on 1st March 2019. A Screening Decision was received on 15th May 2019 and stated:

“Having regard to the key issues identified in Schedule 3 of the 2017 Regulations and WO Circular 11/99, the Local Planning Authority is of the view that the characteristics, location and any potential impact of the development as outlined in the supporting documentation are likely to be significant upon the environment for the reasons identified in the screening opinion attached.

Accordingly, there is considered to be a requirement for a formal Environmental Impact Assessment to be submitted under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.”

2.19 The Screening Opinion and associated report are included at **Appendix H**.

2.20 Consequently, the application is supported by an Environmental Statement.

3 RESPONSES TO THE CONSULTATION PROCESS

Specialist Consultee Responses

- 3.1 Five letters were sent out to specialist consultees:
- Welsh Government (Agricultural Land Division)
 - Cadw
 - Dwr Cymru Welsh Water
 - Natural Resources Wales
 - Vale of Glamorgan Council as the Local Highways Authority
- 3.2 Four responses were received by the deadline of 9th July 2019.
- 3.3 Table 3.1 overleaf provides a summary of all the matters raised from statutory consultees.

Table 3.1 Specialist Consultee Responses

Consultee	Comments	Developer Response
Welsh Government Department for Energy, Environment and Rural Affairs (Agricultural Land Classification)	<u>No objection</u> Site was surveyed in 2011 by Reading Agricultural Consultants. The majority of the site does not fall within the best and most versatile land (Grades 1 – 3a).	Appendix B of RPS Planning Statement updated to reflect actual survey information rather than the Predictive Agricultural Land Classification Map.
Cadw	<u>No objection</u>	N/A
Dwr Cymru Welsh Water	<u>Objection</u> Sewerage a) Foul sewer crosses the site in NW corner. No operational development will be permitted within 3m either side of the centreline of the sewer. Site layout should take account of the location of the sewer. b) Unlikely that sufficient capacity exists to accommodate foul flows generated by the development. Hydraulic Modelling Assessment is required to examine existing network and consider the impact of the introduction of flows from development on the local public sewerage network and suggest possible solutions. DCWW will not support development where there are no known solutions and recommendation is that the HMA is done prior to the submission of the application. c) Development requires SuDS approval and developer should engage with VoGC as SAB.	The sewer can be diverted if necessary under a S185 Agreement. Subsequent to receiving the PAC response, DCWW has suggested meeting with Legal & General and other key stakeholders to discuss the proposed drainage strategy for the site and the wider Enterprise Zone. An initial meeting is organised for August 2019.

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	<p><i>Water Supply</i></p> <p>a) Development is in an area where there are water supply problems for which there are no improvements planned within current Capital Programme (2020 to 2025). Hydraulic Modelling Assessment would be required.</p> <p><i>Sewage Treatment</i></p> <p>No problems envisaged with Waste Water Treatment Works for the treatment of domestic discharges from the site.</p>	
Natural Resources Wales	<p><u>Significant concerns</u></p> <p><i>European Protected Species</i></p> <p>Further surveys for otters, bats, dormouse and Great Crested Newts required and if surveys identify presence of any EPS, planning submission should include full proposals to mitigate or compensate for the impact of the development on the species in question.</p> <p><i>Contamination</i></p> <p>Assumption there is no gross contamination present on site but if any is found, NRW should be consulted.</p> <p><i>Historic Landfill</i></p> <p>Site is located on a historic landfill. VoGC Environmental Health department should be contacted in regard to this matter.</p>	<p><i>European Protected Species</i></p> <p>eDNA surveys for Great Crested Newts have confirmed none are present. Surveys relating to bats, dormouse and breeding birds are ongoing and will be complete by September 2019 and reported to VoGC prior to determination. Appropriate mitigation will be included.</p> <p><i>Contamination</i></p> <p>Noted.</p> <p><i>Historic Landfill</i></p> <p>Noted.</p>
Vale of Glamorgan Council	No response received	N/A

PRE-APPLICATION CONSULTATION REPORT

Local Highways Authority		
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Adjoining Land Owner/Occupier and Community Councillors Consultation Responses

- 3.4 Twenty three notice letters were sent out to owners/occupiers of adjoining land and the local ward members.
- 3.5 Six responses were received from adjacent owner/occupiers and one response was received from one of the local ward members, Councillor Andrew RT Davies, albeit he responded in his capacity as a Welsh Assembly Member for South Wales Central.
- 3.6 Table 3.2 overleaf provides a summary of all the matters raised from adjoining land owners/occupiers and a response to how the matters have been addressed.

Table 3.2 Owner/Occupier and Community Councillor Consultation Responses

Consultee	Comments	Developer Response
Cardiff International Airport Limited and Welsh Government (two separate, but identical letters)	<p><u>Principle of development supported but further detail on a number of matters required:</u></p> <ul style="list-style-type: none"> a) Maximum and minimum heights, widths and lengths of buildings should be included in the application submission. b) Inconsistencies in proposed land uses should be clarified and the appropriateness of proposed trade counter uses examined further. c) A commitment should be made to paying reasonable set up and on-going maintenance costs associated with the proposed extension to Porthkerry Park. d) The scheme should be amended to ensure the future prospect of a rail link through the site to Cardiff Airport is safeguarded. e) If access is not reserved, full details of cyclist and pedestrian links to and within the site need to be provided. f) Greater clarity with regard to the proposed active travel measures should be provided at outline stage. 	<ul style="list-style-type: none"> a) Minimum and maximum building heights, widths and lengths have been added to the Land Use and Storey Heights Parameter Plan. b) Trade counter uses have been removed from the proposed range of land uses. c) Discussions with regard to any financial contributions will take place through the course of the determination of the planning application. d) The application proposal does not include the safeguarding of any land to provide a future rail link and this reflects the Draft Supplementary Planning Guidance for the Cardiff Airport & Gateway Development Zone (July 2019). Paragraph 6.1.30 of the Draft SPG states that <i>"no dedicated route has been safeguarded in the LDP or the Masterplan for the provision of such a link because there is no certainty of delivery at this time and it would be unreasonable to fetter the delivery of development within the Enterprise Zone on this basis, however it remains a key aim to deliver sustainable public transport links to the airport and the Enterprise Zone"</i>. Legal & General is fully supportive of this approach and discussions are ongoing with regard to how the application proposal can contribute to improved public transport provision to the Enterprise Zone. e) The Preliminary Spine Road drawings have been updated to include further detail on cycle and pedestrian access. f) The application is supported by a Framework Travel Plan and further discussions will be held through the course of the determination of the planning application.

<p>The Stevens Family, The Old Rectory, Porthkerry</p>	<p><u>Concerns in respect of landscape, ecology and flood risk and drainage:</u></p> <p>Landscape</p> <ul style="list-style-type: none"> a) Inconsistencies, omissions and inaccuracies within the draft Landscape and Visual Appraisal. b) Methodology does not follow usual practice. c) A detailed analysis of the effects of the development proposal has not been undertaken. d) The Old Rectory should have been included as a viewpoint. e) Only one LANDMAP sensory assessment has been done, all five areas should have been assessed. f) The proposed development should not be seen as being “against a background of built development on the skyline” as the majority of the application site bounds open countryside. <p>Ecology</p> <ul style="list-style-type: none"> g) The Ecology Survey is does not include survey information in relation to protected species. h) Initial transect surveys undertaken at The Old Rectory site in 2019 provided evidence of bat activity near the wooded area at the northern boundary of the fields and along the site boundaries and along both Whitehouse and Bullhouse Brook. i) Slow worms have been observed on site at The Old Rectory and eels have been observed within the brooks. 	<p>Landscape</p> <p>The Landscape and Visual Appraisal has been updated in light of the comments raised including the addition of all five LANDMAP sensory assessment areas.</p> <p>Ecology</p> <p>eDNA surveys for Great Crested Newts have confirmed none are present. Surveys relating to bats, dormouse and breeding birds are ongoing and will be complete by September 2019 and reported to VoGC prior to determination. Appropriate mitigation will be included. No evidence of slow worms or eels has been found on the application site and the Council’s ecologist has not raised any concerns in relation to run-off.</p>
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	<p>Habitats could be adversely affected by any changes to water quality as a result of runoff from the development.</p> <p>Flood Risk and Drainage</p> <ul style="list-style-type: none"> j) Further calculations are required to determine the sizing of attenuation basins. k) Foul sewer system has insufficient capacity to accept foul water from the development. l) Preliminary Drainage Strategy shows a foul sewer crossing The Old Rectory – an approach not agreed with the owners of The Old Rectory. m) Proposed foul drainage scheme is unfeasible and cannot be implemented. n) No allowance made for maintenance by Welsh Water. o) The RPS report does not take account of flood risk p) Scheme must be revised to deliver a drainage design that is viable. 	<p>Flood Risk and Drainage</p> <p>The application is being submitted in outline and the SAB submission reflects this. As a result of the PAC process, DCWW has suggested meeting with Legal & General and other key stakeholders to discuss the proposed drainage strategy for the site and the wider Enterprise Zone. This meeting is scheduled for August 2019.</p> <p>The application site is not in an area at risk of flooding.</p>
Lower Porthkerry Farm (Grade II Listed)	<ul style="list-style-type: none"> a) The proposal will decrease the value of Lower Porthkerry Farm and house prices in general in Rhoose. b) There is no buffer proposed between the site and Lower Porthkerry Farm. c) The proposal will result in the loss of the farm and the livelihood and house of a young family. d) Roads into and out of Rhoose are already very congested resulting in pollution and noise pollution. e) Land on the northern side of the road has planning permission for industrial use and this should be developed first. 	<ul style="list-style-type: none"> a) This is not a valid planning consideration. b) An increased tree planting belt is now proposed along the southern boundary, to increase the buffer between the development parcels and the land to the south. This will provide significant additional screening for Lower Porthkerry Farm. c) Model Farm is a tenanted farm and the leaseholder and Legal & General are now in negotiations regarding compensatory provision. d) Measures are included within the scheme to discourage single occupancy journeys. The application is also supported by a Framework Travel Plan and further discussions will be held through the course of the determination of the planning application to agree measures to improve sustainable transport options.

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		<p>e) Outline planning permission was granted in 2000 for B1/B2/B8 uses. Reserved matters were never submitted and the outline consent has now lapsed. Notwithstanding, there is no legislative or policy mechanism to prevent Legal & General from submitting a development proposal for land within their ownership and there is no requirement for alternatives sites to come forward first.</p>
<p>Upper Porthkerry Farm (Grade II Listed)</p>	<p>a) No prior notice of the application proposal was given prior to the public exhibition.</p> <p>b) Land proposed for the extension to Porthkerry Park includes the cesspit for Upper Porthkerry Farm and discussions must take place to protect privacy once the land transfer takes place. Maintenance agreements must also be put in place to tend the fields to the north east to the rear of Upper Porthkerry Farm.</p> <p>c) The water table will be affected by the proposed development.</p> <p>d) The road infrastructure cannot cope with the additional traffic proposed.</p> <p>e) Alternative locations should be developed first.</p> <p>f) Ecological survey insufficient.</p> <p>g) Archaeological Survey insufficient.</p> <p>h) Proposal will have a negative impact on heritage assets in the area.</p> <p>i) Loss of signature views and detriment to the landscape.</p> <p>j) RPS has a vested interest in the proposal being granted planning permission and therefore cannot provide a set of fair and unbiased reports.</p>	<p>a) There is no requirement to give prior notification to adjoining occupiers at any earlier stage than it was given. Notwithstanding, Legal & General acknowledge it may have been beneficial to advise adjoining occupiers of the proposals in advance of the public exhibition.</p> <p>b) Increased tree planting is now proposed along the southern boundary. The transfer of the land will be dealt with through a legal agreement and anyone with an interest in the land will need to be party to the agreement. Maintenance details will also be agreed.</p> <p>c) It is not anticipated that there will be any impact on the water table. None of the statutory consultees (NRW, DCWW) have raised impact on the water table as a concern.</p> <p>d) The application is supported by a Transport Assessment, scoped through pre-application discussions with VoGC officers. The Assessment acknowledges the impact on the highway network and discussions are ongoing regarding mitigation measures and improvements to the sustainable transport network.</p> <p>e) There is no legislative or policy mechanism to prevent Legal & General from submitting a development proposal for land within their ownership and there is no requirement for alternatives sites to come forward first.</p> <p>f) eDNA surveys for Great Crested Newts have confirmed none are present. Surveys relating to bats, dormouse and breeding birds are ongoing and will be complete by September 2019 and reported to VoGC prior to determination. Appropriate mitigation will be included.</p>

		<p>g) An archaeological desk-based assessment (DBA) was first prepared for the site by RPS/CgMs in 2009. This was superseded by new a DBA issued in 2018, and further updated in June 2019. The latest version of the DBA included a Stage 1 assessment of potential impacts on designated archaeological heritage assets (Scheduled Monuments) in the surrounding area, following pre-application correspondence with and advice from Cadw. The DBA (2018 version) was submitted to GGAT in February 2019, with a request for a steer on their likely requirement for pre-determination works within the site (e.g. geophysics, trial trenching). Judith Doyle, Archaeological Planning Officer at GGAT indicated both in phone conversations and e-mails that GGAT would be 'likely to recommend mitigation by condition' and not request pre-determination works. The only caveat to this was that a final decision would be made dependent on the final plans as submitted with any application. As such, the Archaeological Survey is considered to be robust and sufficient to allow Cadw/GGAT to make an informed decision about the acceptability of the application proposal in respect of impact on the archaeological resource.</p> <p>h) The application is supported by a Built Heritage Statement and the ES also includes a Built Heritage chapter. Both conclude the impact on heritage assets to be acceptable. Cadw were also consulted through the PAC process and offer no objection to the proposal.</p> <p>i) The application is supported by a Landscape and Visual Appraisal and the ES also includes a Landscape and Visual Impact chapter. Both conclude the impact on the landscape is acceptable. Notwithstanding, it is acknowledged the proposal will give rise to a change in the character of the landscape.</p> <p>i) RPS is a multi-disciplinary consultancy employing professional advisors in a range of technical disciplines. Each discipline has its own professional body – RTPI, CIEEM, ICE etc and a code of ethics to adhere to. RPS has no 'vested interest' in planning permission being granted and the reports submitted with the application reflect this.</p>
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PRE-APPLICATION CONSULTATION REPORT

Wales & West Utilities	<ul style="list-style-type: none"> a) There are live gas services feeding the buildings on Model Farm. All gas services should be disconnected and a site clearance certificate received from WWU before demolition can take place. b) There are live high pressure gas mains in the vicinity and caution should be exercised when working in the vicinity of these mains. 	<p>Noted</p>
Cllr Andrew RT Davies	<ul style="list-style-type: none"> a) Accepts that site is allocated within the LDP but notes the relevant policy states development should be phased. b) Remedial measures should be put in place to deal with traffic congestion before any development is permitted. c) Reservations regarding the potential impact on the natural environment, including an area of natural woodland. d) Any extension to Porthkerry Park must ensure residents' privacy. e) No current demand for additional cargo space at Cardiff Airport and therefore the development is speculative, with no proven business case. 	<ul style="list-style-type: none"> a) Supporting text to Policy MG10, at paragraph 6.58 states the phasing of development will be critical and the proposed Masterplan will be required to consider phasing for the whole allocation. A draft Masterplan has now been published and in respect of phasing, states that a phasing strategy will be required to support future applications to demonstrate the proposal would not compromise the future development of the entire site and that each phase of the proposal would be supported by adequate infrastructure. Legal & General is part of a working group with other key stakeholders in the Enterprise Zone (VoGC, CAVC and Cardiff Airport) and discussions regarding infrastructure for the wider Enterprise Zone are now underway. b) The application is supported by a Transport Assessment and Framework Travel Plan. Discussions relating to improvements to the highway network and sustainable transport will take place through the course of the determination of the application. c) The application is supported by a raft of technical surveys including a Tree Report and Impact Assessment and Landscape and Visual Impact Assessment. The semi-ancient woodland will not be affected by the development. d) As a result of the pre-application process, an increased tree buffer is now proposed along the southern boundary of the site. e) The application is speculative with no end users identified. It is not a requirement to have occupiers secured before submitting a planning application.

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		Representatives from RPS and Legal & General met with Cllr RT Davies on 12 th July 2019 to explain the scheme further and address the concerns raised.
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Third Party Representations

- 3.7 As previously noted 119 feedback forms were received at the public exhibition on 7th June 2019.
- 3.8 During the 28 day PAC period a further three forms were received in the post and 21 were passed on from Rhoose Library at the end of the consultation.
- 3.9 In addition, 26 letters and 155 emails were received between 11th June and 9th July. Throughout the course of the PAC, four respondents also raised objections via telephone, direct to RPS.
- 3.10 In total, 328 third party representations were received.
- 3.11 Table 3.3 overleaf provides a summary of all the matters raised from third parties and a response to how the matters have been addressed.

Table 3.3 Third Party Representations	
Comment	Developer Response
The site is greenfield and is not suitable for development. Alternative brownfield sites should be considered first.	The site is currently greenfield but is allocated for Class B1/B2/B8 uses in the adopted VoGC LDP as part of the St Athan – Cardiff Airport Enterprise Zone. The application proposal fully complies with the allocation. The site's location within the St Athan – Cardiff Airport Enterprise Zone, and immediately adjacent to Cardiff Airport, fulfils a very specific policy requirement – to deliver aerospace and defence related investment through making suitable land available to attract such investment. To locate the proposal elsewhere, outside of the allocation and the Enterprise Zone, would not meet the policy requirement. Furthermore, as the landowner, Legal & General has the right to promote development on the site through a planning application. There is no obligation to apply for planning permission on other, alternative sites, particularly as Legal & General has no control over those sites.
Proposal would have an unacceptable impact and exacerbate the existing traffic and congestion issues.	<p>The application is supported by a Transport Assessment, the scope of which was agreed through the course of pre-application discussions with the Council's highways officers and Transport for Wales. A Framework Travel Plan is also submitted, which includes measures and initiatives and sets out a monitoring framework to be agreed between Legal & General, the Council and Transport for Wales.</p> <p>Operational modelling of three junctions has been undertaken as part of the Transport Assessment. The modelling, based on a future year of 2026, shows that the proposed site access and the existing A4226/B4265/Tredogan Road/Dragonfly Drive junctions will operate within their design capacity. The Waycock Cross roundabout will operate over its design capacity but within its theoretical capacity in the AM network peak hour and over its theoretical capacity in the PM network peak hour. Discussions are ongoing with highways officers within VoGC regarding appropriate mitigation.</p> <p>The site is considered to be well located in relation to public transport provision, with future improvements benefitting those accessing the site, the wider Enterprise Zone and the local community. An integrated approach to sustainable transport improvements is being sought, through collaborative working with other key stakeholders in the Enterprise Zone.</p>

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Proposal would have a negative impact on the environment and ecology.	<p>The application has been subject to Environmental Impact Assessment and is accompanied by an Environmental Statement. The EIA process has found the development to be acceptable.</p> <p>The application is accompanied by a Preliminary Ecological Appraisal, undertaken in September 2018. The Appraisal assessed the ecological value of all of the land within Legal & General's ownership and recommended further ecology surveys be undertaken to inform any future planning application, including bats, badgers, dormice, otters, breeding birds, reptiles and Great Crested Newts. To date, there is no evidence of badgers, otters, reptiles or Great Crested Newts on the application site or the extended boundary. Surveys will be finalised in the next 6-8 weeks and the findings presented to the Council with any required mitigation.</p> <p>On the application site itself, existing tree belts and hedgerows will be retained where possible. The surface water drainage through the site has been designed to serve as both ecology and drainage corridors and additional ecological mitigation is proposed through the enhancement of existing woodland areas and the provision of rough grassland and scrub.</p>
There is no demonstrated need or demand for the development. Sites nearby with planning permission have failed to attract occupiers.	The site is allocated for employment uses. Legal & General have been clear that the application is speculative and will be marketed internationally to the aerospace/aviation sectors if planning permission is granted. There is nothing in the planning regime to prevent a speculative application.
Destruction of Model Farm and the impact on the livelihood and home of a young family is unacceptable.	Model Farm is a tenanted farm and the leaseholder and Legal & General are in negotiations regarding compensatory provision.
Support for employment uses.	N/A
Existing drainage infrastructure does not have sufficient capacity to cope with new development.	The application has been subject to extensive discussions with VoGC in respect of drainage and the scheme has been through the SAB pre-application process. Following receipt of the PAC response from DCWW, a meeting has been arranged in August to discuss the drainage strategy.
Proposed number of jobs is unrealistic.	The application proposes a significant quantum of employment floorspace, targeted towards the aerospace, defence and high tech manufacturing sectors. At outline stage it is difficult to predict the exact number of jobs that will be created, and 2,000 is considered to be a conservative estimate.

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Any jobs provided will not be available for local people who would not have the specialist skills required.	The St Athan – Cardiff Airport Enterprise Zone has been designated, in part, to exploit the highly skilled local labour force. In addition, CAVC provides specialist aerospace training courses and it is envisaged the application proposal will provide apprenticeship opportunities.
Use of the site for gypsies and travellers is unacceptable.	The application proposal does not include any provision for gypsy and traveller pitches and confusion has arisen as a result of the inclusion of an excerpt of the key for the LDP on the display boards at the public exhibition on 7 th June (see Appendix C), which included the annotation for Policy MG5 – Gypsy and Traveller Site.
Clarification is required on the type of uses proposed for the site.	Consent is sought for Class B1/B2/B8 uses. The site is allocated under Policy MG10 and supporting text to the policy states that development in the Enterprise Zone will focus on the aerospace and defence sectors. The policy is clear that it is not allocated to meet local market demand for general industrial or office uses, but rather to accommodate business and employment uses catering specifically for the needs of the aerospace industry and high tech manufacturing. Any permission granted is likely to include conditions restricting the uses to aerospace and hi-tech manufacturing.
Destruction of the Green Belt	The site does not fall within any Green Belt designation.
RPS has a vested interest in planning permission being granted and cannot present unbiased findings in the survey reports.	RPS is a multi-disciplinary consultancy employing professional advisors in a range of technical disciplines. Each discipline has its own professional body – RTPi, CIEEM, ICE etc and a code of ethics to adhere to. RPS has no 'vested interest' in planning permission being granted and the reports submitted with the application reflect this.
The Ecology Survey provided is inadequate.	The application is supported by a Preliminary Ecological Appraisal, sufficient for the purposes of registration and validation. eDNA surveys for Great Crested Newts have confirmed none are present. Surveys relating to bats, dormouse and breeding birds are ongoing and will be complete by September 2019 and reported to VoGC prior to determination. Appropriate mitigation will be included.
The Archaeology Survey provided is inadequate and a field survey should have been undertaken to inform the proposal.	An archaeological desk-based assessment (DBA) was first prepared for the site by RPS/CgMs in 2009. This was superseded by new a DBA issued in 2018, and further updated in June 2019. The latest version of the DBA included a Stage 1 assessment of potential impacts on designated archaeological heritage assets (Scheduled Monuments) in the surrounding area, following pre-application correspondence with and advice from Cadw. The DBA (2018 version) was submitted to GGAT in February 2019, with a request for a steer on their likely requirement for pre-determination works within the site (e.g. geophysics, trial

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	trenching). Judith Doyle, Archaeological Planning Officer at GGAT indicated both in phone conversations and e-mails that GGAT would be 'likely to recommend mitigation by condition' and not request pre-determination works. The only caveat to this was that a final decision would be made dependent on the final plans as submitted with any application. As such, the Archaeological Survey is considered to be robust and sufficient to allow Cadw/GGAT to make an informed decision about the acceptability of the application proposal in respect of impact on the archaeological resource.
The application proposal has been poorly communicated to local residents.	Publicity for the proposal has been undertaken in accordance with the statutory requirements.
The proposal is not compliant with the Well-Being of Future Generations Act.	The proposal has been assessed against the seven wellbeing goals set down in the Act, and is considered to be compliant with all, and will deliver strongly in respect of delivering a prosperous Wales, a resilient Wales and a more equal Wales.
The proposed extension to Porthkerry Country Park is unnecessary and will create an additional maintenance burden for VoGC.	The extension to Porthkerry Country Park is an integral part of Policy MG10 and the overall delivery of the Gateway Development Zone. Arrangements for the transfer of the land and future maintenance will be agreed through the course of the determination of the application.
Members of staff from RPS have worked at VoGC and previously been on the Planning Committee at VoGC. The relationship between RPS and VoGC is questionable.	One member of the RPS team worked at VoGC between June 2002 and September 2002, as part of the planning administration team. No-one in the RPS team has ever been a Councillor in VoGC or a member of its Planning Committee. RPS represent a number of clients within the VoGC administrative boundary and officers and members within VoGC were therefore known to us in a professional capacity prior to the start of the Model Farm project. This does not amount to any conflict of interest or allow us to benefit from any preferential treatment from officers or members.

4 DEVELOPER RESPONSE TO CONSULTATION RESPONSES

4.1 As a result of the consultation and the representations received, the following changes/amendments have been made:

- The Agricultural Land Classification has been clarified with Welsh Government and an updated Agricultural Land Classification Map is included in the application submission. The Map confirms the application site does not comprise the best and most versatile agricultural land grades 1, 2 or 3a, aside from a very small parcel in the north western corner, immediately adjacent to the Holiday Inn Express.
- A meeting between Legal & General and Dwr Cymru Welsh Water has been arranged for August 2019 to discuss the drainage strategy for the site. A meeting with the occupiers of The Old Rectory will follow as the foul drainage strategy includes a foul sewer crossing land within the boundary of The Old Rectory, outside of the control of Legal & General.
- A schedule setting out the maximum and minimum heights, widths and lengths of each building is now included on the Land Use and Storey Heights Parameter Plan.
- The proposed boundary of the extension to Porthkerry Country Park is now included on the Indicative Concept Masterplan and the Green Infrastructure Parameter Plan.
- The 'Landscape Buffer/Open Space' shown on the Green Infrastructure Parameter Plan and the Indicative Concept Masterplan in the south western corner of the application site, to the immediate north of residential properties on Porthkerry Road has been replaced with 'Native Woodland Planting' to better screen the development from those residential properties.
- The 'Native Woodland Planting' buffer will continue along the southern boundary, to act as a screen between the development parcels and the proposed extension to Porthkerry Country Park.
- The Landscape and Visual Appraisal has been updated to include an additional viewpoint from the Public Right of Way that runs along the eastern boundary of the site, an Impact Assessment of all five of the sensory LANDMAP areas and the inclusion of the proposed building heights on to the ZTV drawing included at Figure 5.
- The Preliminary Spine Road drawings have been updated to include the geometry of the proposed access roundabout and the footway/cycleway improvements.

4.2 It is considered Legal & General have complied with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendments) Order 2016 in respect of pre-application consultation requirements.

Appendix A

Public Exhibition Advertisement

Legal & General and RPS would like to invite you to a

Public Exhibition

for a Proposed Business Park at
Port Road, Rhoose

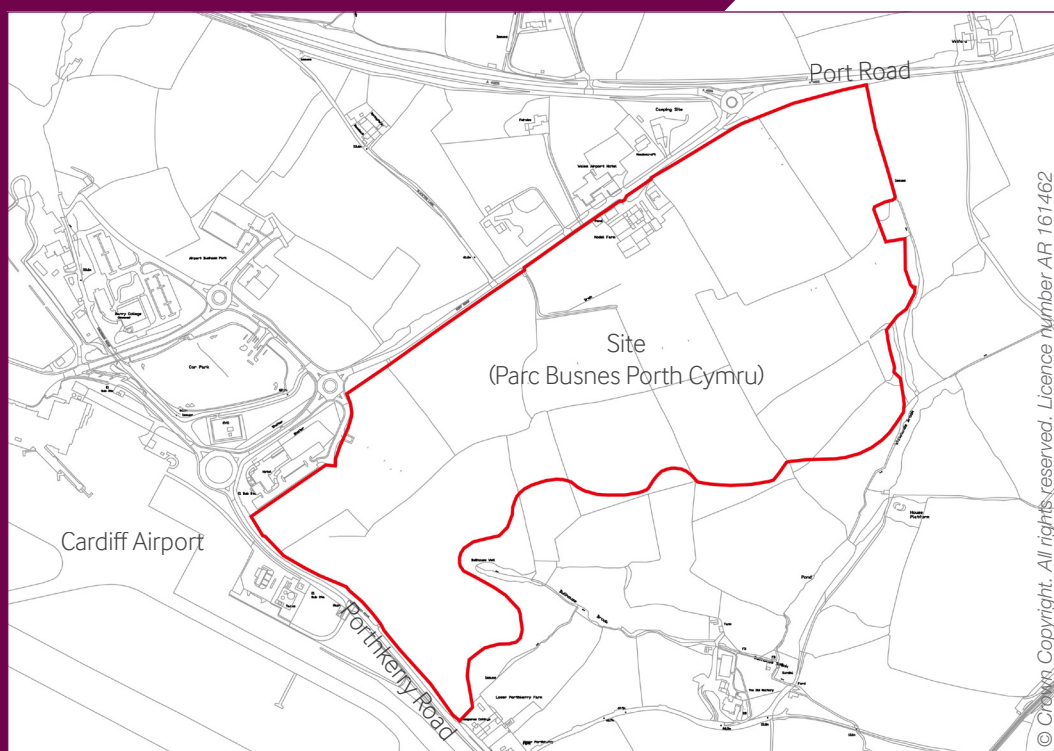
Friday 7th June 2019

12:30 to 19:00

to be held at the

Rhoose & District Social Club & Institute

15 Fontygary Road, Rhoose, CF62 3DR



Legal & General is preparing a planning application for a business park development at **Port Road, Rhoose**.

We would like to invite you to a drop-in public exhibition to view and provide feedback on the emerging proposals to be held at the Rhoose & District Social Club & Institute on **Friday 7th June between 12:30 and 19:00**. You are invited to drop-in anytime during the event.

Representatives from the design team will be present to discuss the proposals, answer questions and gather your feedback. Full details of the application will be available soon at:

www.pbpc-consultation.cymru



Appendix B

Publicity Leaflet

Find Out More

RPS is holding a public exhibition on **Friday 7th June 2019**. Please come along to our **drop-in event between 12:30 and 19:00** to view and provide feedback on the emerging proposals.



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Keep in Touch

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All architectural visualisations are shown for illustrative purposes and are indicative only



Porth Busnes Parc Cymru
Port Road, Rhoose

June 2019