

Rowlands, Ceiri

Subject: FW: 2023-01-12 - Application number 2019/00871/OUT - consultation response AC62746 (A Cairns) to M Goldsworthy

From: [REDACTED]
Sent: 12 January 2023 10:32
To: [REDACTED]
Subject: Model Farm - Application number 2019/00871/OUT - consultation response AC62746

Dear Jaci/Angela

Please find below an email from Alun Cairns regarding Model Farm/ Newport City Council Freeport bid – can you please forward this on to the relevant officer? Many thanks, Louise

Dear Cabinet Member

I would like to write to the council supporting my constituent's email below and to raise the same objections and concerns. I appreciate that you may already have responded to my constituent regarding this matter, but I would like to add my voice to his concerns.

Kind regards



Rt Hon Alun Cairns MP
MP for the Vale of Glamorgan
01446 748657

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From: [REDACTED]
Sent: 23 December 2022 17:05
To: [REDACTED]
Subject: Model Farm - Application number 2019/00871/OUT - consultation response

Dear Sirs,

Model Farm/ Newport City Council Freeport bid – new material consideration.

In response to Ceiri Rowlands letter of the 6th December 2022, regarding new information received on Transport, ecology and built heritage I would like to make the following points.

VOG Planners have failed to inform the Planning Committee of a Freeport Bid at Cardiff Airport and how it could affect Model Farm. The Council are trying to sneak the Model Farm Planning application through, without giving the public the facts.

Legal and General and their agents RPS Consulting, must be aware of the Freeport bid, yet have not mentioned the implications in their latest transport assessment about future road capacity.

I request that consideration of the Model Farm Planning application be postponed until the outcome of the bid for a Freeport in Wales is concluded by the UK Government.

A bid has been made by Newport City Council (hereafter referred to the 'NCC bid') under the UK Government's Freeport Programme in conjunction with the Welsh Government. The bid includes reference to Cardiff Airport being a site for one element of the bid. This is **a new material consideration** in determining the application for planning approval by Legal and General on Model Farm. **With so much uncertainty, as set out below, it is impossible for you to process the Model Farm application until the Freeport bidding process is concluded. If you continue to do so, ample grounds exist for further challenge and expense to the Council.**

It is disappointing that Planning Officers failed to include mention of the Freeport Bid in their report to the Planning Committee in October 2022, and we question the absence of any details of discussions that the Vale of Glamorgan Council's Planning function have had with the bidders.

The Vale of Glamorgan Council have provided planning reports to the Public, it's Planning Committee and Welsh Government that are potentially misleading and have excluded important facts and information.

It is my reasonable and legitimate expectation that this new material consideration prevents appropriate determination of the proposed Model Farm Industrial Estate for the following reasons :-

1. The NCC Freeport bid is not included in the Local Development Plan and the planning parameters applied to the Model Farm development would substantially change. Planners must have had discussions on this issue but have failed to report this in planning reports.
2. **The Leader of the Council and the Cabinet Member have allowed Planning Reports to be produced that keep the NCC Freeport Bid secret.**
3. The aim of the Freeport is to increase freight revenues at Cardiff Airport to be in excess of 50 per cent of total revenue. This means substantial extra traffic and road haulage movements which the Planning Reports need to take into account.
4. Legal and General and their agents RPS Consulting must be aware of the Freeport bid, and yet have not mentioned the implications in their latest transport assessment about future road capacity.
5. There are implications for additional traffic flows through the villages of **Bonvilston and St. Nicholas** that the latest transport update from RPS Consulting does not address, or provide any attempt at mitigation. There are already concerns being expressed in those communities about road noise and potential breaches of Environmental Law and this latest update fails to take account of the potential increases in traffic flows as a result of Model Farm and the potential Freeport development.
6. A new masterplan for Cardiff Airport would be required, as the current plans do not mention any Freeport plans, risks or ramifications. How much land would be required, and the location of such land.
7. The possibility of a Freeport at Cardiff Airport would have implications for other partners. Has the issue been discussed, for example, with **Barry Town Council**, who have expressed concerns about, and objected to the Model Farm application?
8. A new Freeport status which includes Cardiff Airport would require an Environmental Impact Assessment screening process. This is clearly a new material consideration which prevents determination.
9. As the Bidding process is private and all interested parties are not able to access the individual bids, this means that no interested parties – including the Vale of Glamorgan

Council – knows what the possible ramifications are on Employment, additional road traffic movements, active travel routes or indeed which land is intended to be used for the Freeport in the vicinity of the Airport. I believe that land at St Athan (Owned by Welsh Government) would be the most sensible location, where substantial brownfield land is currently available. Therefore, why would the bid developers want to purchase expensive development land from Legal and General? There is however a crucial issue that Planning Committee reports have not addressed in relation to the Freeport bid. There are very specific requirements about land use and availability within the bidding prospectus. The size of suitable sites for Freeport Status, their connectivity to other sites within the bid and their current use. The land intended to be used must have formed part of the original pre-application discussions with the UK Government and Newport City Council. That has resulted in a bid meeting the initial bidding requirements. The Vale of Glamorgan Council has remained silent on these matters.

10. There is uncertainty whether the Cardiff Airport arm's length Company could be included in any successful Freeport bid as questions will be asked within the planning process about financial viability, which is a key material consideration in such planning decisions. But nonetheless, there is a bid in place for Freeport status and associated activity for which the Vale of Glamorgan planning function must take into account. The Subject cannot be ignored and kept secret. How many meetings with developers, Welsh Government and other Local Planning Authorities have taken place to discuss the Freeport?
11. Approving the Model Farm application for B1/B2/B8 employment land would be contrary to Technical Advisory Note (TAN) 23 – Economic Development. The requirements of TAN 23 – as set out at paragraph 4.5.2 – is that 'persistent oversupply of employment land may cause harm where the planned land supply exceeds demand, so that allocated employment sites remain vacant for long periods and frustrate development for other land uses'. If you approve the Model Farm application, without knowing what the outcome of the Freeport bidding process is, it could result in a substantial oversupply of Employment Land. If you grant planning permission to the Model Farm development prior to the outcome of the Freeport Bid process you could enable the eviction of the farmer and then if the Freeport Bid in South-East Wales is unsuccessful, an act of agricultural vandalism would have been carried out unnecessarily.
12. Welsh Government have clearly stated, in regard to Freeport Bids, that 'We expect the relevant local authorities to have discussed the fit with relevant development plans and policies (and the potential use of place-based planning approaches referred to above) as part of compiling the application.' **When did Planning Officers discuss the NCC Freeport bid with developers, and why has this not been mentioned in Planning reports.**
13. There are technical reasons relating to the NCC Freeport bid, that without knowing the specific content of the bids, the public and other interested parties cannot effectively scrutinise implications. For example, the Bidding Prospectus for Freeport Status has critical statements about Planning, and the need for compliance with the following:-

For each relevant site successful applications should:

- a. explain the current planning status including status in relation to Future Wales and the local development plan
- b. explain the planning needs for the anticipated development
- c. detail how these development needs will be met, including what options have been considered
- d. explain the steps taken (or planned) to engage with local communities to consider how proposals will maintain and enhance where possible the quality of the locality within which the proposal is located

e. explain how any relevant requirements for environmental assessment will help to mitigate any adverse impacts and offer net positive environmental benefits. Applications can also usefully indicate whether any early engagement with key agencies has been undertaken as part of this

f. provide evidence of early discussions with planning authorities on the potential use of place-based planning tools

Each of these issues has a relevancy, and a requirement, that the means you cannot approve the Model Farm development without addressing the implications of having a Freeport located at Cardiff Airport.

I believe that there are many procedural weaknesses in the planning reports and supporting evidence, that would make the premature, unevidenced approval of the Model Farm planning application an inappropriate action by the Vale of Glamorgan Council until the outcome of the NCC Freeport bid is known.

I have a reasonable and legitimate expectation that you will now postpone further consideration of the Model Farm application and welcome confirmation of your agreement to this.

Ron Price

Sent from [Mail](#) for Windows

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