



LAND AT TREDOGAN ROAD, RHOOSE, BARRY

Representations on Replacement Local Development Plan

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Local Plan Reps
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1. Introduction

- 1.1. Vale of Glamorgan Council (the Council) is preparing a Replacement Local Development Plan (RLDP) to shape future development across the Vale until 2036, replacing the adopted LDP 2011-2026.
- 1.2. The **Deposit Plan** is the next formal stage in the development plan preparation process.
- 1.3. The Council is seeking views on the Deposit Plan and is holding a six-week public consultation between 28th January 2026 until 11th March 2026
- 1.4. These representations on the Deposit Plan have been prepared by 'Tetra Tech Consulting Services Ltd' (the Agent) on behalf of 'Amstone Developments Limited'.
- 1.5. These representations relate to 'Land at Tredogan Road, Rhoose, Barry' (the Site), as shown below, owned by Amstone Developments Ltd (ADL).



Figure 1: Land at Tredogan Road.

- 1.6. This report comprises two parts:
 - **Part 1:** Review of existing and emerging policy including:
 - TAN23,
 - PPW12,
 - Vale of Glamorgan LDP 2011-2026
 - Vale of Glamorgan Supplementary Planning Guidance
 - Vale of Glamorgan Consultation on the Replacement LDP
 - **Part 2:** Representation supporting the allocation of the Site for commercial activities.

PART 1: REVIEW OF EXISTING AND EMERGING POLICY

2. Technical Advice Note 23 – Economic Development

- 2.1. Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans.
- 2.2. Technical Advice Note 23: Economic Development was adopted February 2014. TAN23 provides guidance on the role of land use planning in generating wealth, jobs and income.
- 2.3. Paragraph 1.1.1 of the TAN advises,
‘Planning Policy Wales (PPW) defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. In producing development plans or determining planning applications local planning authorities need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations’.
- 2.4. TAN23 provides guidance to support the implementation of Planning Policy Wales (PPW) in relation to economic development. It defines economic development broadly, encompassing not only B1–B8 employment uses (offices, industry, storage) but also retail, tourism, public services, energy, and agriculture. TAN 23 encourages planning authorities to plan positively for economic activity that generates jobs, income and wealth.
- 2.5. The TAN emphasises the importance of recognising market signals while balancing economic benefits with environmental and social objectives. Development Plans are expected to be informed by robust, regionally aware evidence bases, including employment land reviews, and should integrate with local economic strategies. Plans should provide flexibility to adapt to change and avoid constraining economic growth due to lack of suitable sites, while also ensuring land is not oversupplied or protected where it has no reasonable prospect of employment use.

- 2.6. TAN 23 stresses the importance of criteria-based policies within Local Development Plans to deal with unforeseen proposals, ensuring that economic opportunities can be appropriately considered even if they fall outside of allocated sites.

3. Planning Policy Wales - Edition 12

3.1. Planning Policy Wales - Edition 12 (PPW) was adopted February 2024.

3.2. Chapter 5 of PPW sets out the Welsh Government's national policy framework for planning "productive and enterprising places". It provides a strong policy basis for the allocation and development of employment land, including strategically located sites near major transport infrastructure such as Cardiff Airport. The chapter emphasises the importance of aligning land use planning with economic, environmental, and social goals in line with the Well-being of Future Generations (Wales) Act 2015.

3.3. Supporting Employment Land in Strategic Locations

3.4. The PPW advises that the planning system plays a central role in supporting economic growth by ensuring that a sufficient supply of appropriately located employment land is identified and protected through development plans. Employment land should be aligned with the principles of sustainable development, the well-being goals, and national decarbonisation objectives.

3.5. Planning authorities are required to:

- Plan proactively for a mix of employment opportunities;
- Allocate and protect land that meets the current and future needs of business and industry;
- Ensure that employment land is well-connected, particularly via public transport, road, and digital infrastructure.

3.6. PPW highlights that employment land must be strategically located, serviced, and realistically deliverable. Locations near multimodal transport hubs (such as airports, ports, and motorway junctions) are particularly suited to employment allocations given their capacity to support logistics, advanced manufacturing, and aviation-related enterprises. Employment land associated with these nodes plays a vital role in the wider South East Wales economy.

3.7. Employment Land Provision and Flexibility

3.8. Paragraph 5.4 of PPW confirms that employment land targets in development plans should:

- Meet market demand and allow for flexibility and choice;
- Respond to economic change through a mix of site types and sizes;
- Avoid constraints on economic growth due to insufficient land allocations.

3.9. Where land has been identified for employment use but remains undeveloped, planning authorities are expected to review delivery constraints and work to remove barriers where appropriate. However, they must avoid the release of viable employment land unless there is robust evidence that it no longer serves a strategic or local economic role.

3.10. PPW recognises that employment sites may have multiple roles, supporting a range of B-class and non-B-class uses such as commercial, logistics, and aviation support services. Where employment land is linked to major infrastructure (e.g. Cardiff Airport), the policy does not restrict uses solely to those directly related to that infrastructure unless there is a clear functional justification.

3.11. Safeguarding Employment Land and Meeting Market Needs

3.12. Paragraphs 5.4.5–5.4.9 of PPW guide the management of existing employment land:

- Viable employment sites should be retained, especially those that meet identifiable demand or have strategic importance.
- Employment land should match market requirements, providing sites suitable for high-value, low-carbon, and technology-driven industries, as well as low-cost spaces for SMEs.
- Land with no reasonable prospect of being used or reused for employment purposes should be considered for reallocation but only following robust assessment.

3.13. Importantly, the economic potential of sites should be maximised where they have good accessibility, proximity to labour markets, and supporting infrastructure. This supports the long-term safeguarding and delivery of key employment sites in locations such as the Cardiff Airport and Bro Tathan Enterprise Zone area.

3.14. Strategic Planning and Economic Resilience

3.15. PPW also recognises that economic development must be planned at a regional scale. Employment land provision must reflect travel-to-work areas and functional economic zones, not just local authority boundaries. Sites such as those near Cardiff Airport often serve a regional or national function and should be planned and protected accordingly.

3.16. Furthermore, Planning Policy Wales encourages the use of Employment Land Reviews to ensure that the scale, location and type of employment land meets the evolving needs of businesses and sectors across Wales. Employment allocations should be supported by robust evidence and aligned with strategic objectives, such as:

- Low-carbon economy;
- Infrastructure-led development;
- Aviation, manufacturing, logistics and innovation;

- Local job creation and supply chain development

4. Vale of Glamorgan Local Development Plan 2011-2026

4.1. The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28th June 2017.

4.2. The Plan sets out the vision, objectives, strategy and policies for managing development in the Vale of Glamorgan and contains a number of local planning policies and makes provision for the use of land for the purposes of housing, employment, retailing, recreation, transport, tourism, minerals, waste, and community uses. It also seeks to identify the infrastructure that will be required to meet the growth anticipated in the Vale of Glamorgan up to 2026 and provides a monitoring framework for assessing the effectiveness of the Plan.

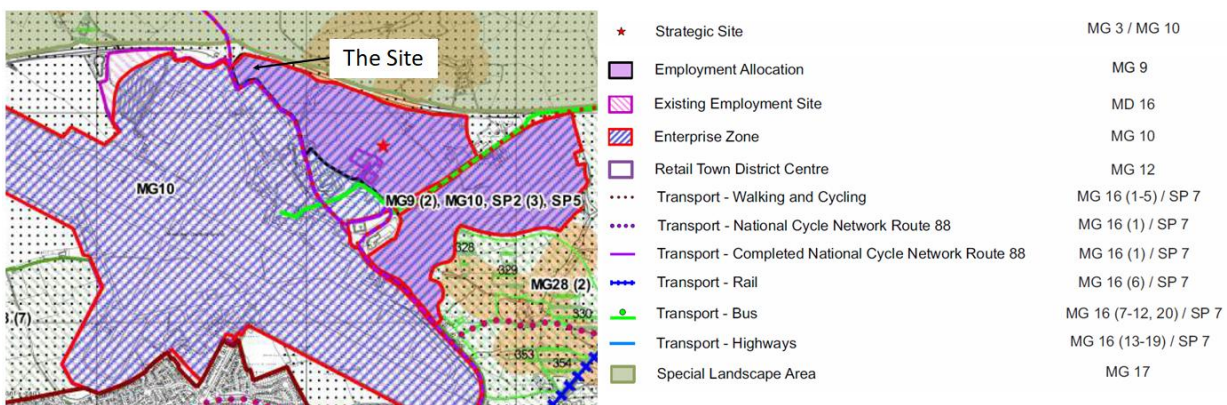


Figure 2: Extract from Proposals Map June 2017

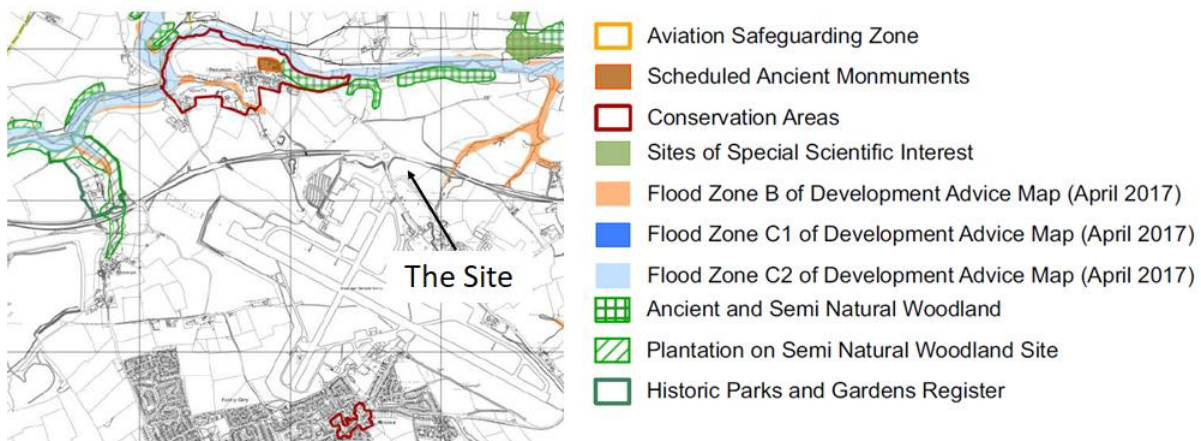


Figure 3: Extract from Constraints Map June 2017

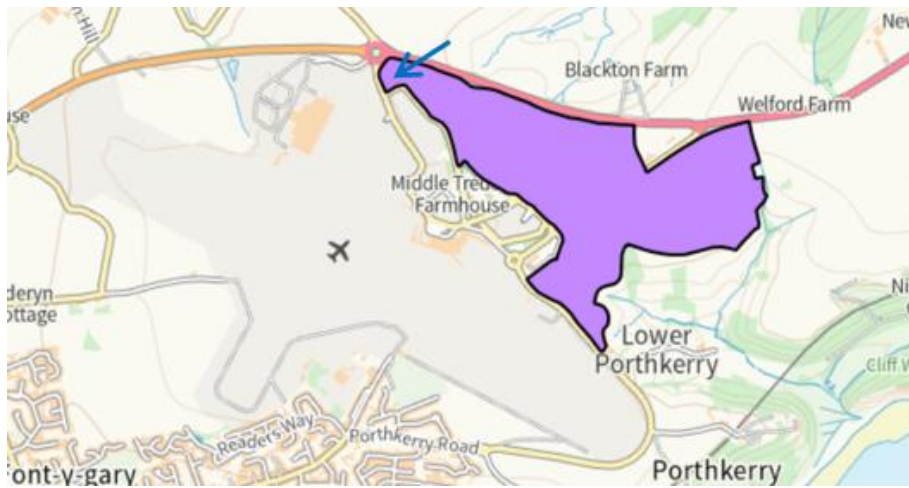


Figure 4: Employment Allocation (02) Strategic Site

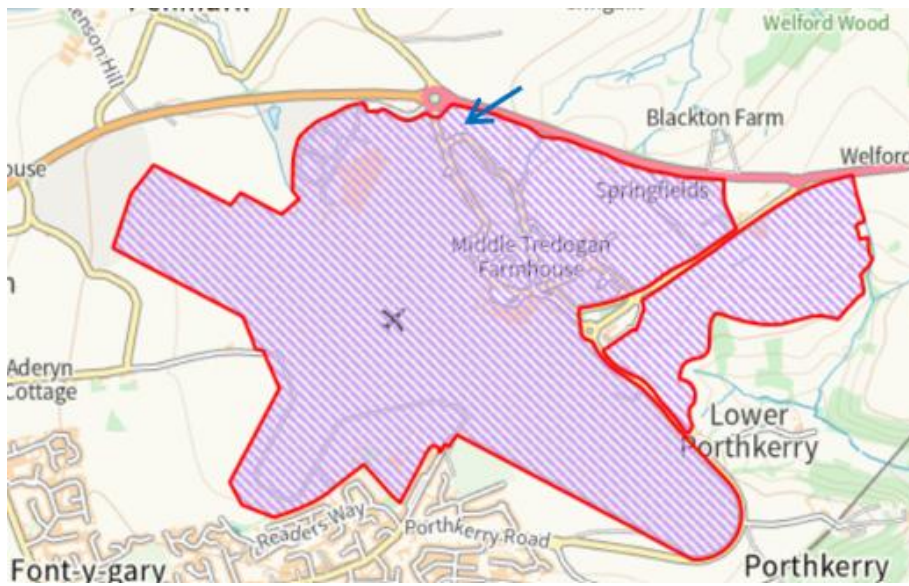


Figure 5: St Athan - Cardiff Airport Enterprise Zone

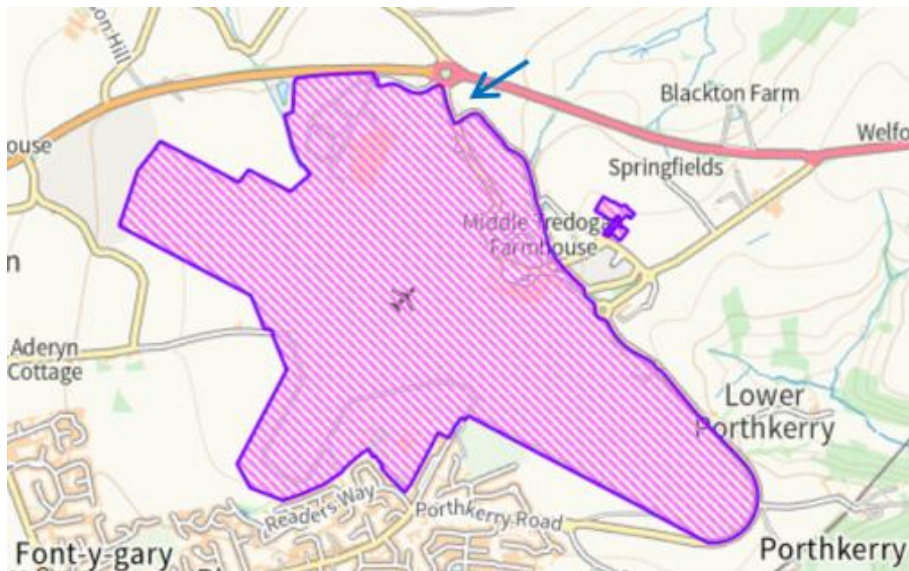


Figure 6: Cardiff International Airport Existing Employment Site

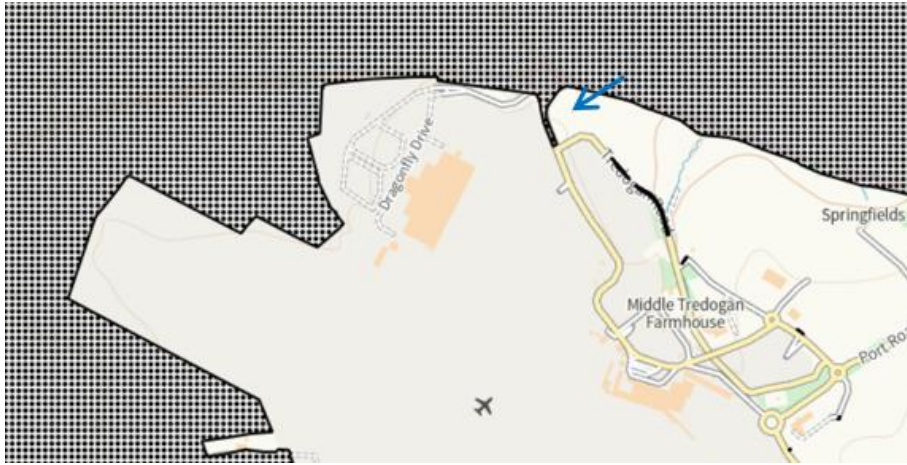


Figure 7: Mineral Safeguarding (Limestone 2)

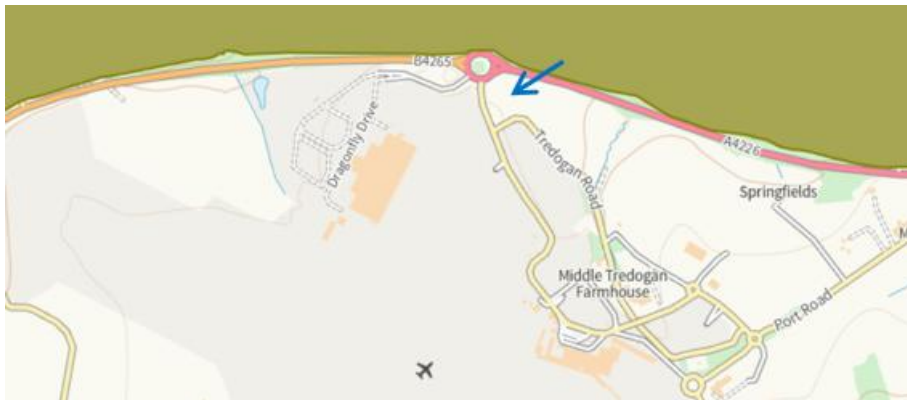


Figure 8: Special Landscape Area

- 4.3. The Site is allocated in the 2017 Plan as follows:
- Employment Allocations – Strategic Employment Site to the North of Port Road – Policies MG9, SP2, and SP5
 - St Athan - Cardiff Airport Enterprise Zone – Policy MG10
 - Aviation Safeguarding Zone
 - National Cycle Network Route – Cardiff Airport runs south of the site – Policies MG16 and SP7
- 4.4. North of the Site to the north of the A4226 is an area allocated for Mineral Safeguarding (Limestone 2) and the Nant Llancarfan Special Landscape Area. These are both outside of the Site.
- 4.5. **Policy SP2** (Strategic Sites) allocates three '*Strategic Sites*', one of which is '*3. Employment uses at land adjacent to the airport and Port Road, Rhose, as part of the St. Athan – Cardiff Airport Enterprise Zone*'.
- 4.6. Paragraph 5.33 of the supporting text advises, '*The sites identified in Policy SP2 (Strategic Sites) are those that are considered to be major elements contributing to the implementation of the LDP Strategy as set out in the Plan i.e. the promotion of*

development and regeneration opportunities within the specific areas identified within the strategy’.

4.7. Paragraphs 5.41 and 5.42 state,

‘The LDP Strategy recognises the importance of Cardiff Airport to the future prosperity of the Vale of Glamorgan, as does its designation (along with St Athan) as part of the ‘St Athan – Cardiff Airport’ Enterprise Zone. This strategically located flagship site is intended to stimulate inward investment and consolidate the role of the Vale of Glamorgan within the Capital Region.

To facilitate the Enterprise Zone, Policy MG10 allocates 77.4Ha of land surrounding the airport, which is intended to focus on business and employment uses catering specifically for the needs of the aerospace industry and high tech manufacturing. Policy MG10 expands upon this strategic allocation designation, which will require a Masterplan to demonstrate how a comprehensive development can achieve the strategic goals identified within the LDP, alongside the provision of a sizeable extension to the existing Porthkerry Country Park to the west of Barry (Policy MG28 refers)’.

4.8. **Policy MG9** (Employment Allocations) allocates land for employment at 11 sites. The Site is within site 2 ‘Land adjacent to Cardiff Airport and Port Road, Rhoose (part of St Athan - Cardiff Airport Enterprise Zone)’. Policy MG9 advises that site 2 is a Strategic Employment Site with a gross area of 77.4 hectares and a net area of 76.64 hectares with B1, B2, and B8 uses.

4.9. The supporting text to policy MG9 in paragraph 6.52 advises that sites 1, 2 and 3 (the Strategic Sites) ‘are intended to cater specifically for the needs of the aerospace industry and high tech manufacturing, encouraging investment from the regional and sub-regional market place’.

4.10. **Policy MG10** (St Athan - Cardiff Airport Enterprise Zone) advises the following:

Land is allocated adjacent to Cardiff Airport and Port Road, Rhoose (77 ha) and at the aerospace business park St Athan (305ha) for the development of 382 hectares of strategic employment land (class B1, B2 and B8) forming part of the St Athan – Cardiff Airport Enterprise Zone.

The development of the enterprise zone will be guided by a masterplan to include the following elements:

- *The refurbishment of the existing 70,000 sqm hanger at St Athan (17.95 ha);*
- *An aerospace business park north and south of the runway at St Athan;*
- *A business park for aviation support services at Picketston (11.79 ha);*
- *A new northern access road at the St Athan Enterprise Zone (Policy MG16 refers);*
- *New aerospace, education, research and development, manufacturing, office and other ancillary development at the Cardiff Airport and gateway development zone (77 ha);*
- *A 42 hectare extension to Porthkerry Country Park (Policy MG28 refers);*
- *Provision of sustainable transport infrastructure; and*

- *The incorporation of sustainable centre at the Cardiff Airport and gateway development zone.*

5. Vale of Glamorgan Adopted Supplementary Planning Guidance

5.1. The Council has adopted the following relevant planning guidance in support of the Local Plan:

- Economic Development, Employment Land and Premises Supplementary Planning Guidance (March 2023)
- Cardiff Airport and Gateway Development Zone 2011- 2026 Supplementary Planning Guidance (December 2019)
- Cardiff Airport - St Athan Enterprise Zone - Strategic Development Framework (2015)

Economic Development, Employment Land and Premises SPD

5.2. The Council's adopted Supplementary Planning Guidance (SPG) on Economic Development, Employment Land and Premises (March 2023) provides detailed guidance on how planning applications relating to employment land will be considered in support of the Local Development Plan (LDP) strategy. The SPG reinforces the strong policy presumption in favour of retaining and delivering employment uses on allocated and existing employment sites, particularly those of regional economic importance such as land near **Cardiff Airport and the Bro Tathan Enterprise Zone**.

5.3. The SPG acknowledges the critical role played by strategic sites in meeting regional needs and supporting the Welsh Government's economic priorities, including aerospace, logistics, high-tech manufacturing, and inward investment. It confirms that land adjacent to Cardiff Airport is allocated solely for employment uses and forms part of the strategic employment land supply under LDP Policy SP5 and MG9.

5.4. Importantly, the SPG supports the principle of flexibility in delivering employment uses. While 'employment use' is generally defined by B1, B2 and B8 use classes, the Council also recognises that other complementary or sui generis uses may be suitable where they contribute to the economic role of the site and do not materially change its employment function. Complementary uses include trade counters, cafes or food outlets, leisure facilities and childcare facilities where they primarily serve the employees and customers of the employment site.

5.5. The SPG highlights the need to maintain a sufficient range and choice of employment land to:

- Support economic growth and job creation;

- Reduce the need for commuting (particularly relevant given the high levels of out-commuting from the Vale);
- Attract inward investment and support regional employment strategies;
- Meet long-term economic and climate objectives through well-connected and sustainable employment locations.

5.6. The SPG also states that redevelopment of employment land for non-employment uses will not normally be permitted unless clear evidence demonstrates that the site is no longer viable or needed. However, this test is clearly not engaged where a site continues to form part of the allocated supply and is suitable, available, and capable of supporting general employment uses in the short to medium term.

5.7. In conclusion, the 2023 SPG provides clear and up-to-date policy support for the continued allocation and delivery of land for general employment uses in strategic locations such as the Cardiff Airport area. It supports the representation that such sites should not be limited solely to airport-related activities but instead should accommodate a broader range of general employment uses compatible with the site's location, infrastructure and economic potential.

Cardiff Airport and Gateway Development Zone SPD

5.8. The **Cardiff Airport and Gateway Development Zone SPG (December 2019)** supplements the Vale of Glamorgan Local Development Plan (LDP) and provides detailed guidance on how development proposals within the **Cardiff Airport–St. Athan Enterprise Zone** will be assessed. The guidance seeks to ensure the delivery of comprehensive, sustainable, and high-quality development across the wider strategic employment allocation.

5.9. The SPG emphasises the strategic significance of the site, highlighting its potential to deliver **regionally important economic growth** across a range of employment sectors. The Development Zone forms part of the Welsh Government's designated **Enterprise Zone**, focused on aerospace, advanced manufacturing, research, training and wider business uses.

5.10. Crucially, while the SPG acknowledges that the Enterprise Zone supports the growth of aviation and aerospace activity, it equally promotes a diverse mix of uses. This includes:

- General employment uses (Use Classes B1, B2 and B8);
- Specialist training, education and research facilities;

- Business development for local and international enterprises;
- A “campus-style” environment suitable for a broad range of employers.

5.11. The SPG confirms that land within the Gateway Zone (including land to the south and north of Port Road) is intended to support the creation of a wider “*airport city*” — a sustainable, multi-functional employment destination with high levels of connectivity and accessibility, not limited to aviation-specific sectors.

5.12. Key points that support general employment use:

- **Policy MG10** and the SPG explicitly encourage a range of business, research and technology-related uses, not solely tied to aviation;
- The SPG recognises the need for complementary and flexible employment development, supporting both local and regional needs;
- The illustrative masterplan (Appendix 10) identifies a broad mix of employment typologies across the development zone, including general commercial floorspace;
- The SPG promotes the integration of high-quality design, green infrastructure, and transport connectivity, reinforcing the site’s suitability for a diverse range of employment users.

5.13. Overall, the SPG provides clear and robust support for the allocation of land at Cardiff Airport for general employment uses, ensuring long-term flexibility and responsiveness to market demand. There is no policy requirement to restrict development solely to aviation-related employment. Accordingly, representations in favour of general employment use (including B1, B2 and B8 uses) are wholly aligned with the aims and objectives of this SPG and the wider LDP framework

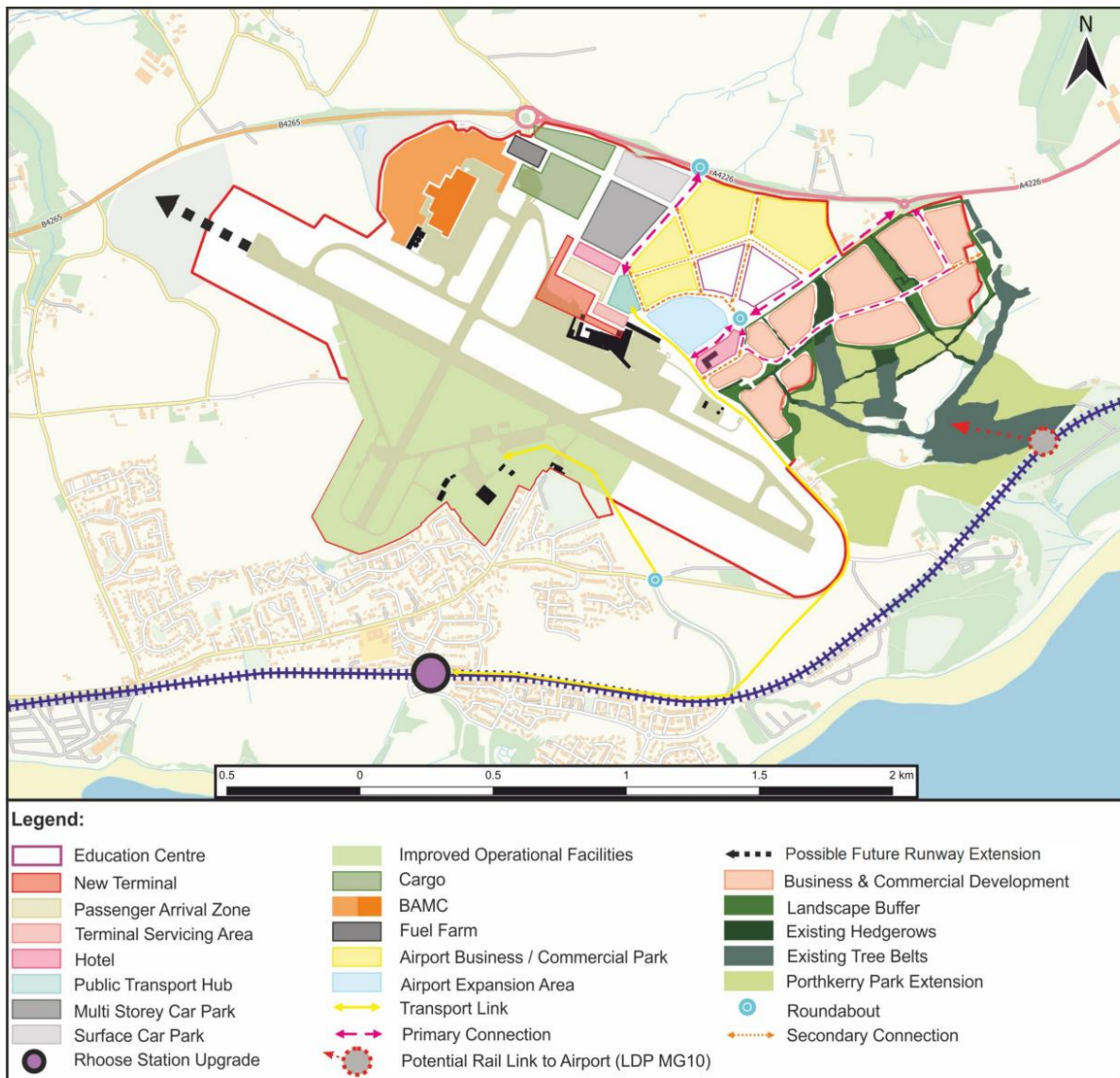


Figure 9: Supplementary Planning Guidance - Cardiff Airport and Gateway Development Zone 2011-2026 (December 2019)

Cardiff Airport - St Athan Enterprise Zone Strategic Development Framework

- 5.14. The **Cardiff Airport and Gateway Development Zone SPG (2019)** provides detailed guidance for the development of the strategic employment land surrounding Cardiff Airport. This SPG clarifies how proposals will be assessed and reinforces the policy framework for securing high-quality, sustainable economic development in the area.
- 5.15. The SPG recognises that while Cardiff Airport is a key part of the Welsh Government's Enterprise Zone, and has specific aspirations relating to the aerospace sector, **the**

strategic employment allocations within the Gateway Zone are intended to accommodate a broader mix of uses. These include general employment, education, training, research, and transport-related functions.

5.16. Key policy principles from the SPG include:

- **Policy MG10 of the LDP** supports the creation of a “sustainable mixed-use ‘airport city’ development”, with a focus not only on aviation but also on business and employment uses for local and international firms, including high-quality office accommodation and ancillary commercial development.
- The SPG confirms that land to both the north and south of Port Road forms part of a wider strategic employment site, much of which is in non-airport-related use or remains undeveloped, despite being allocated for employment since the previous Unitary Development Plan.
- While the SPG encourages uses related to aerospace and high-tech manufacturing, it does not require exclusive use by aviation-related sectors and instead seeks complementary employment-generating development that integrates with wider transport and sustainability objectives.
- The **Illustrative Masterplan (Appendix 10)** identifies a variety of employment typologies across the development zone, including business/commercial park uses, supporting the case for a flexible approach to employment allocation and delivery.
- The SPG places strong emphasis on design quality, infrastructure delivery, and environmental integration, which are applicable to a wide range of employment uses beyond aviation or aerospace alone.
- A key aim is to enhance economic resilience and attract inward investment, recognising that the development zone will contribute to the prosperity of the Capital Region and the wider Welsh economy.

5.17. While airport-related employment is encouraged, the SPG provides a robust policy foundation for the allocation of land for general employment purposes (B1, B2 and B8), where it contributes to the strategic vision for the zone and satisfies sustainability and design principles. This supports the inclusion of general employment use in the RLDP without limiting the site solely to airport-dependent or aviation-related industries.

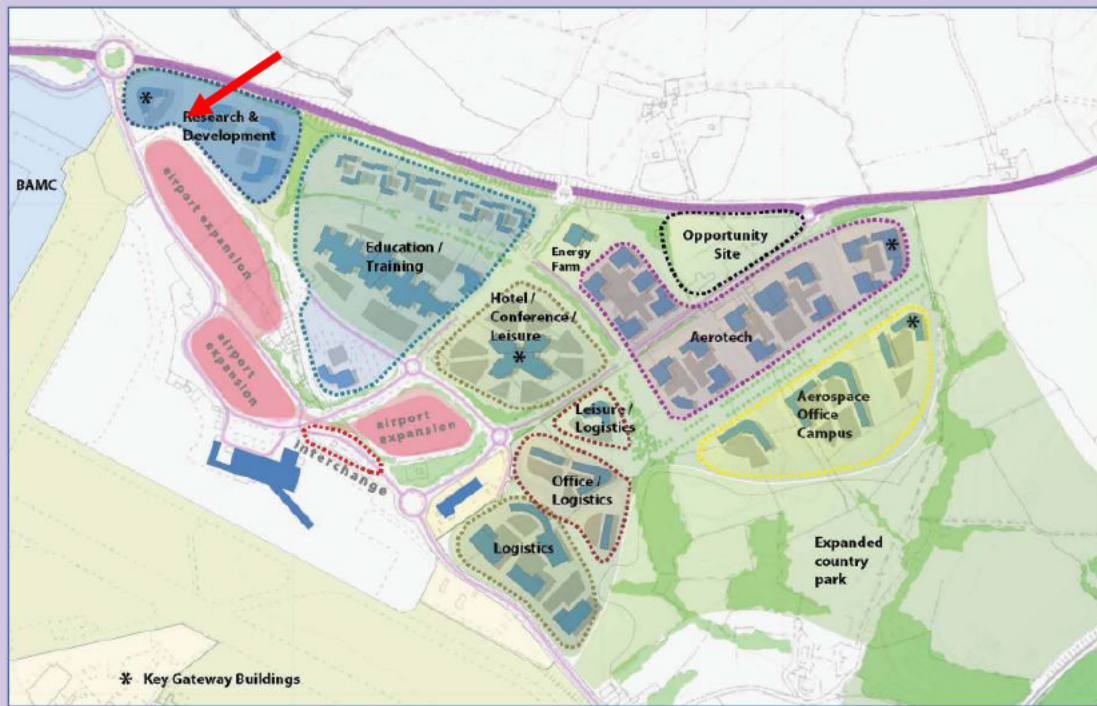


Figure 10: Cardiff Airport - St Athan Enterprise Zone - Strategic Development Framework (2015)



Figure 11: Cardiff Airport - St Athan Enterprise Zone - Strategic Development Framework (2015)

6. Vale of Glamorgan Deposit Replacement Local Development Plan 2021 – 2036

6.1. The Deposit Replacement Local Development Plan 2021 – 2036 (the RLDP, or the Plan) was published November 2025. The Plan sets out an overall Strategy, allocates land for a range of and uses and sets out policies aimed at guiding development and framing Development Management decision making up to 2036.

6.2. The plan sets out key strategic objectives that reflect the key issues faced in the Vale of Glamorgan. One key objective is ‘*Building a Prosperous and Green Economy*’. This objective is adopted as one of the ‘**Key Themes**’ of the plan. The theme seeks to,

Facilitate economic growth across the authority, ensuring a range and choice of local and strategic employment sites and job opportunities in response to employment needs. These opportunities should be adaptive to change and foster the growth of a highly skilled workforce.

6.3. Paragraph 3.41 of the Plan advises that,

The health sector accounts for the largest number of employees within the Vale of Glamorgan, with 8,000 or 19.5% in employment in this sector. Manufacturing was the next largest industry in the Vale of Glamorgan, employing 3,500 or 8.5 percent of the workforce. The private office sector accounted for a combined total of 15.4 percent, or 6,300 employees in the Vale, compared with 16.8 percent for Wales. Due to the high prevalence of residents employed in professional sectors, the Vale can be described as having a skilled workforce,

6.4. Part of the vision of the Plan is,

The Vale has a thriving local economy with a balanced, diversified business base. New employment growth at Bro Tathan and Cardiff Airport Enterprise Zones has attracted inward investment from knowledge-based and high-tech businesses, creating high quality employment and training.

6.5. Objective 9 of the Plan includes:

- Provision of a range and choice of good quality employment land.
- Support for infrastructure to enable local businesses to expand.

6.6. **Section 5** of the plan sets out a *Sustainable Growth Strategy*. Paragraph 5.1 advises that,

The RLDP strategy identifies broad areas where new development will occur in order to achieve the Vision and Objectives set out earlier in the Plan

6.7. The Plan’s Sustainable Growth Strategy comprises six key elements. Element 5 is:

Supporting the role of Cardiff Airport as a strategic gateway for international connectivity.

6.8. Paragraph 5.26 refers to Future Wale’s recognition that Cardiff Airport is,

‘an essential part of Wales’s strategic transport infrastructure. It is an international gateway connecting Wales to the world and is an important driver within the Welsh economy’.

- 6.9. Figure 10 presents a ‘Key diagram’. The area around Cardiff Airport, including the Site, is allocated as an ‘Enterprise Zone’. The B4365/A4226 at the northern boundary of the Site is shown as a ‘Connectivity’ route.
- 6.10. The Plan proposes a Spatial Strategy for the Vale. **Policy SP1** advises that the Plan will make provision for employment sites to deliver the identified employment land requirement of 67.8ha and the delivery of up to 5,338 jobs.
- 6.11. **Policy SP4** concerns ‘*Placemaking*’. Amongst other criteria the policy requires development to create a ‘*diverse mix of uses and multi-functional spaces*’.
- 6.12. The **Proposals Map** of the Deposit Replacement Local Development Plan (RLDP) allocates the Site as within:
- Major Employment Allocation – Land East of Cardiff Airport, Roose.
 - Policy SP14(1).
- 6.13. **Policy SP14** concerns Employment Growth. The policy allocates ‘*Land east of Cardiff Airport, Rhose (16.4 ha net)*’ as a ‘*Major Employment Allocation*’. The Site is within this **Major Employment Allocation** (MEA), which is one of four. There are also a further four Local Employment Allocations.
- 6.14. Policy SP14 advises that these allocations are to support job growth and economic prosperity across the Vale of Glamorgan over the plan period and to meet the projected employment land needs of 67.8 hectares of employment land, and the delivery of up to 5,338 jobs. The policy makes provision of 182 net hectares of employment land for the following employment uses:
- B1 (Office and Light Industry),
 - B2 (General Industries) and
 - B8 (Distribution and Storage)
- 6.15. The policy also states that within these MEAs,
- ‘Complementary ancillary non-B uses maybe permissible where these would provide supporting services for existing and future businesses and employees’.*

- 6.16. The supporting text to the policy advises that the sites will *'provide for flexibility and choice to meet the Vale's employment land requirements over the Plan period'*.
- 6.17. Paragraph 6.267 advises that 'land east of Cardiff Airport Business Park' forms part of the *'Cardiff and St Athan Enterprise Zones and Land to the South of Junction 34 of the M4'*.
- 6.18. Paragraph 6.269 advises that **Land east of Cardiff Airport** is *'allocated for mixed-use employment'*.
- 6.19. **Policy EMP4** concerns proposals for non-employment uses on existing employment areas and premises. The policy advises that on Major Employment Sites and Employment Regeneration Opportunity Areas, non B1, B2, and B8 uses will be restricted to ancillary services or facilities associated with an existing or proposed employment use that would serve employees on the wider employment site where one or more of four criteria are met. Support is given where the proposed use would be:
- Ancillary to the main operations of an existing or proposed business, or
 - Would be complementary to neighbouring uses the role and functioning of the employment site, and is of a scale that would support the existing businesses/ location;
 - Would not unacceptably harm amenity or the environment; and
 - Would not affect the vitality or viability of existing town centres.
- 6.20. **Policy RCS3** concerns Hot Food Takeaways. The policy advises that Hot Food Takeaways will only be permitted *'within a defined retail, commercial and service centre, edge of centre or out of centre retail park and does not cause or exacerbate an over-concentration of A3 hot food takeaway uses in that centre'*.

7. PART 2: REPRESENTATION

- 7.1. This chapter sets out the planning and policy justification for the continued allocation of the Site at Tredogan Road, Rhooose, for:
- employment,
 - enterprise, and/or
 - commercial uses.
- 7.2. The chapter proposes a **flexible allocation** of the Site that supports a **broad range of employment-generating activities**, consistent with:
- national and local policy objectives,
 - market conditions,
 - regional economic strategy, and with the
 - Site's location within the role of Cardiff Airport as a strategic gateway for international connectivity.

Planning (Wales) Act 2015 and Soundness Tests

- 7.3. Planning (Wales) Act 2015
- 7.4. In accordance with sections 2 and 3 of the Planning (Wales) Act 2015, the Replacement LDP must contribute to the achievement of sustainable development and must be prepared with regard to national policy and guidance.
- 7.5. LDP Manual (Edition 3)
- 7.6. The Deposit RLDP must also satisfy the statutory soundness tests. The treatment of employment uses within the draft policies fails several of the Welsh Government's Soundness Tests:
- CE1 – Coherence & Effectiveness: The restrictive reference to B1/B2/B8 uses is not consistent with PPW (paras 5.3–5.4) or TAN 23, both of which adopt a wider definition of “economic development”.
 - CE2 – Flexibility: Restricting employment allocations to traditional B-class uses fails to allow for the market adaptability required by PPW and TAN 23.
 - CE4 – Deliverability: The Council's own monitoring demonstrates significant under-delivery of employment land. Artificially narrowing the permitted range of economic uses will further undermine deliverability.
- 7.7. These soundness concerns reinforce the need for a broader definition of employment uses on the Site.

Comments on the RLDP

7.8. Proposals Map Allocation

- 7.9. *Amstone Developments Limited* (ADL) support the draft RLDP allocation of the Site within the ‘*Major Employment Allocation – Land East of Cardiff Airport, Roose*’.

7.10. Definition of Employment Uses

- 7.11. The Plan, in several draft policies, refer to employment land and employment uses as being within the traditional B1, B2, and B8 use classes.
- 7.12. Planning Policy Wales (Ed.12, Feb 2024) does not restrict employment land or employment uses to B1/B2/B8. Instead, national policy relies on the concept of “economic development”, which includes:
- activities that generate jobs,
 - uses that contribute to economic output,
 - development that supports the foundational economy,
 - sectors such as tourism, education, health, energy, recycling, logistics and service-based industries.
- 7.13. PPW therefore directs local planning authorities to plan for a range of employment types, not simply B-class uses.
- 7.14. The Vale of Glamorgan Employment SPG (March 2023) makes the Welsh Government’s approach especially clear. It states that:
- ‘this strict use class definition can ignore other uses that provide the same economic development benefits as ‘B1, B2 and B8’ uses and that require similar types of sites...’*
- 7.15. This is entirely consistent with PPW’s long-standing focus on economic development rather than the rigid B-class employment concept.
- 7.16. The RLDP’s terminology conflates “employment land” with “B-class uses”. Under the Town and Country Planning (Use Classes) Order 1987 (as amended for Wales), B-class categories remain in force; however, Planning Policy Wales deliberately defines “economic development” much more widely. For plan-making purposes (PPW 5.4.2), employment includes offices, research, industry, warehousing, retail, tourism, public services, construction, energy, minerals, waste and telecommunications sectors.

- 7.17. Accordingly, any policy limiting employment allocations to B1/B2/B8 is not consistent with PPW and must be amended under Soundness Test CE1.
- 7.18. The following types of uses are routinely treated as employment in Welsh planning policy and appeals:
- 7.19. Sui generis uses with industrial/operational characteristics
- Waste and recycling facilities (e.g. MRFs, energy-from-waste)
 - Bus/coach depots, commercial vehicle depots
 - Data centres
 - Energy storage (BESS) and associated electrical infrastructure
- 7.20. Industrial or operational uses that do not neatly fall within B1/B2/B8
- Certain construction, minerals, and utilities operations
 - Distribution hubs that may be partly sui generis
- 7.21. Service and institutional sectors forming part of the Welsh “foundational economy”
- Health, education, care, and community services with significant employment output
 - Tourism and hospitality enterprises
- 7.22. Offices and research uses post-2020
- Welsh policy still treats offices, R&D and tech-based uses as core employment-generating activities—even where their specific class definition is more nuanced.
- 7.23. In Wales, LPAs and Inspectors routinely:
- Interpret employment in line with PPW’s economic-development framework.
 - Consider whether a proposed use delivers jobs, requires employment land, or functions like an industrial/operational activity, even if it is not strictly B1/B2/B8.
 - Treat non-B-class employment proposals as acceptable on allocated employment sites where they fulfil the same economic role.
- 7.24. Policy SP14 – Employment Growth**
- 7.25. ADL partially support the wording of draft RLDP Policy SP14.
- 7.26. ADL agree that the RLDP should support ‘*job growth and economic prosperity across the Vale of Glamorgan over the plan period*’, which is the aim of draft Policy SP14.

- 7.27. ADL support the provision of 182 net hectares of employment land and the delivery of 5,388 jobs.
- 7.28. ADL partially support the provision of B1 (Office and Light Industry), B2 (General Industries) and B8 (Distribution and Storage) employment uses at '*Land east of Cardiff Airport, Rhooose (16.4 ha net)*'. Whilst ADL supports the provision of employment uses on the Site, they consider that use classes B1, B2, and B8 presents too narrow a definition of employment uses. As noted above, the Plan should widen the definition of employment land and employment uses beyond the traditional B1, B2, and B8.
- 7.29. ADL supports the provision of complimentary ancillary non-B uses on the Site where these uses would provide supporting services for existing and future businesses and employees. However, this definition should be expanded to complimentary ancillary non-B uses on the Site that would provide supporting services for existing and future businesses, employees, visitors, and the wider public on the Site **and** in the surrounding area. Such uses may fall outside of the traditional B1, B2, and B8 use but provide important employment and enterprise opportunities.
- 7.30. Policy EMP4 – Non-employment proposals on existing employment areas and premises**
- 7.31. ADL provide a similar response in relation to draft policy EMP4. However, the wording of draft Policy EMP4 requires amendment and clarification.
- 7.32. The draft policy should provide clarification on the meaning of 'non-employment proposals' when considered in the context of the traditional B1, B2, and B8 uses. Non-B1/B2/B8 uses can be considered to be employment proposals.
- 7.33. Points 1 to 8 of draft Policy EMP4 require clarification.
- 7.34. ADL support that points 1 and 2 are separated by the word "or" rather than "and".
- 7.35. Points 3 and 4 are valid but are unnecessary within policy EMP4 as the management of impacts on amenity, the environment, vitality and viability are covered in other draft policies of the plan. There is no need to duplicate this policy wording.
- 7.36. Points 5 to 8 appear to relate only to Secondary, Key and Neighbourhood Employment Sites and Other Sites and Premises in Employment Use and therefore the numbering should re-start at 1. The requirements of whether either point 5 or 6 need to be met along with both 7 and 8 should be clarified due to the use of both the words "or" with "and".

The Strategic Role of the Site

- 7.37. The Site lies within the Cardiff Airport and Bro Tathan Enterprise Zone and forms part of a long-standing strategic employment allocation in the adopted Vale of Glamorgan LDP (2011–2026) under Policy MG9.
- 7.38. The Site benefits from proximity to Cardiff Airport, strategic highway connections (A4226), and existing employment infrastructure. Section 5 of the Plan seeks to support Cardiff Airport as a '*strategic gateway for international connectivity*'. Future Wales recognises Cardiff Airport as '*an international gateway connecting Wales to the world and is an important driver within the Welsh economy*'. The Site is on the roundabout junction of the A4226, B4265, Dragonfly Drive, and Tredogan Road, the key access point to Cardiff Airport and identified as on the Plan's Key Diagram as a connectivity route.
- 7.39. The strategic role of the Site is reinforced by several policies in Future Wales – the National Plan 2040, including:
- Policy 1 (Where Wales Will Grow) – supports concentration of economic growth in the South East region, including Enterprise Zones.
 - Policy 2 (Shaping Urban Growth and Regeneration) – requires that development at strategic gateways such as Cardiff Airport be maximised to support economic resilience.
 - Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) – identifies the Cardiff Airport & Bro Tathan Enterprise Zone as a nationally significant economic cluster.
- 7.40. These policies confirm that the Site performs a regional and national economic role and should therefore accommodate a wide range of employment and enterprise uses, not merely B-class activity
- 7.41. This strategic location makes the Site inherently suitable for a wide range of commercial and employment uses including, but not exclusive to B1, B2 and B8. ADL believe that the RLDP should support a wider range of employment and commercial uses on this land that are not strictly limited to B1, B2 and B8 uses. The Plan should support developments on the Site that capitalise on the strategic location of the Site as the gateway to Cardiff Airport and on the A4226/B4265 connectivity route.

Planning Policy Wales (Edition 12, 2024)

- 7.42. **Planning Policy Wales (Edition 12, 2024)** provides a strong national policy foundation for the ongoing allocation and delivery of employment land in sustainable, connected and market-responsive locations. PPW (Chapter 5) requires planning authorities to:
- Allocate and protect land that meets the current and future needs of business and industry;
 - Ensure land is well-connected, strategically located, and capable of supporting logistics, advanced manufacturing, and general enterprise;
 - Avoid constraints on economic growth arising from overly restrictive policies or inadequate allocations.
- 7.43. The Site can meet the current and future needs of business and industry due to its strategic location adjacent to Cardiff Airport and its excellent road, public transport, and cycle route connections.
- 7.44. Figure 6 of PPW refers to 'Productive & Enterprising Places' being 'Economic Development / Tourism, The Rural Economy, Transportation Infrastructure, Telecommunications, Energy / Minerals / Waste. Page 76 of PPW advises that,
- 'A more Equal Wales can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all'.*
- 7.45. Page 77 concerns '*Productive and Enterprising Trends and Issues*' and confirms that a key issue is,
- 'Ensuring that there is sufficient employment land to meet the needs and requirements of a range of future employment scenarios (including increased automation and the significant contribution of SMEs to the Welsh economy) whilst ensuring that an over-supply of employment land does not prevent the release of land for other uses'.*
- 7.46. Paragraph 5.3.17 of PPW advises that, '*Airports are important hubs, which play a significant role in providing national and international connectivity for tourism and business*'.
- 7.47. Paragraph 5.3.18 of PPW advises, '*Planning authorities should recognise the strategic and local importance of airports and their potential as centres of economic activity*'.
- 7.48. Section 5.4 of PPW concerns *Economic Development*. Paragraph 5.4.1 advises,
- 'For planning purposes, the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-*

term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses’.

7.49. Paragraph 5.4.2 advises,

‘Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. Economic land uses also include construction, energy, minerals, waste and telecommunications sectors which are also sensitive to planning policy. The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim. Similarly, growth in innovative, emerging technology and high value-added sectors such as advanced engineering, renewable and low carbon energy, digital and bio-technology sectors are also strongly supported. Development plans should consider the role these sectors may play in terms of investment and job creation in their area’.

7.50. PPW is clear that policy support should be for economic development and enterprise as a whole rather than solely the traditional B1, B2, and B8 use classes. PPW recognises the importance of B1, B2, and B8 uses, but such uses are only part of the economic, enterprise, commercial, and employment activities of the nation. PPW is clear that planning authorities should support enterprise and the provision of employment land as a whole and not restrict this support and provision to only the traditional B1, B2, and B8 uses. Cardiff Airport is seen as a hub and a gateway for enterprise and economic development without limitation to aviation-specific uses or traditional employment uses. PPW encourages the planning system to support growth, enterprise, and employment as a whole.

7.51. ADL supports this approach and encourages Vale of Glamorgan to support a wide range of flexible commercial and employment and ancillary uses at the Site to meet current and future market demand.

National Guidance on Economic Development (TAN 23)

7.52. **Technical Advice Note (TAN) 23: Economic Development** defines economic development broadly, including not just B-class uses, but also energy, public services, and other sectors that contribute to jobs and income. It encourages local authorities to plan flexibly and respond to changing market demands.

7.53. TAN 23 highlights the risk of planning authorities overly restricting land to specific sectors or uses where this may frustrate development. Instead, it promotes criteria-based

policies and a market-informed approach, especially on strategic employment sites. The Site should be allocated on this basis.

Local Policy and Supplementary Guidance

- 7.54. The continued strategic importance of the Site is reinforced by the Council's own Supplementary Planning Guidance:
- 7.55. **The Economic Development, Employment Land and Premises SPG (March 2023)** confirms that the Site forms part of the strategic employment land supply under Policies SP2, SP5, and MG9. It recognises the need to provide a range and choice of employment land and supports a flexible definition of employment use, including not only B1, B2, and B8 uses, but also appropriate sui generis or complementary uses that contribute to the economic role of a site (e.g. logistics, trade counters, energy, research, or services for employees).
- **Cardiff Airport and Gateway Development Zone SPG (December 2019)** explicitly promotes a diverse mix of employment uses within the Cardiff Airport Gateway area. It envisions the development of a “sustainable mixed-use ‘airport city’” and highlights the potential for office space, R&D, training facilities, logistics, and general business development.

Employment Land Delivery and Market Realism

- 7.56. The Vale of Glamorgan's **2023–2024 Annual Monitoring Report** confirms that the Council has significantly under-delivered on its employment land targets. Only 26.46% of allocated employment land has secured planning permission, against a target of 68% by 2024. This delivery shortfall has triggered a formal review under the LDP Monitoring Framework.
- 7.57. This underperformance points to the importance of maintaining a flexible approach to employment allocations, including the Site, so that it can respond to market interest beyond narrow aviation-related demand.
- 7.58. In contrast to the wider under-delivery of employment land across the Vale of Glamorgan, the Site is genuinely available, deliverable, and achievable within the plan period. The land is in the control of a willing landowner, who is actively promoting the Site for development and is keen to see it brought forward at the earliest opportunity.

There are no known physical or ownership constraints that would prevent the Site being developed for general employment uses.

- 7.59. The Site benefits from strong locational credentials, including proximity to Cardiff Airport, strategic highway access (A4226), and inclusion within the Cardiff Airport and Bro Tathan Enterprise Zone. These factors ensure that the Site is market-attractive, viable, and capable of supporting development in the short to medium term.
- 7.60. Market Need and Demand Evidence
- 7.61. Recent market activity in South East Wales demonstrates strong demand in sectors such as advanced logistics, energy storage (BESS), data centres, digital infrastructure, and recycling and waste technologies — all of which are typically sui generis and not within B-class definitions but are recognised economic development uses under PPW 5.4.2.
- 7.62. Single ownership & deliverability
- 7.63. The Site's single landownership, unconstrained topography, direct access to the A4226/B4265, and proximity to Cardiff Airport place it in the strongest possible position to deliver employment development in the first half of the plan period. This satisfies Soundness Test CE4 (Deliverability).
- 7.64. Contrast with historic under-delivery
- 7.65. The Vale's own Annual Monitoring Report confirms that only 26.46% of allocated employment land has permission. A restrictive B-class policy approach would exacerbate delivery problems, contrary to PPW 5.4 and TAN 23.
- 7.66. The Site's continued allocation within the Replacement LDP will make a positive and realistic contribution to meeting the Council's employment land targets and addressing the shortfall in delivery.

The Role of the Site in Meeting Future Employment Needs

- 7.67. The emerging Replacement LDP identifies the Site as a **Major Employment Allocation** (16.3ha net), supporting B1, B2, and B8 uses. Draft Policy SP14 allows for complementary non-B class uses where they provide supporting services for existing and future businesses. This reflects the Council's acknowledgment that high-quality employment sites must provide for a range of user needs.

- 7.68. It is important that the Site remains allocated for employment uses but with clarification that support would be provided to flexible employment uses.

The Welsh Use Classes Order

- 7.69. In Wales, the Town and Country Planning (Use Classes) Order 1987 (as amended for Wales) continues to define employment uses across Use Classes:
- Class B1 (Business) – including offices, research and development, and light industry;
 - Class B2 (General Industrial);
 - Class B8 (Storage or Distribution).
- 7.70. Unlike England, there has been no consolidation of use classes into a single Class E, meaning policy in Wales must continue to reference these established categories. The proposed allocation should explicitly support B1, B2 and B8 uses, while also allowing flexibility for appropriate employment, enterprise, commercial uses, sui generis uses, or ancillary uses consistent with strategic employment function.

Requested Modification

7.71. Modification 1 – Policy SP14

- 7.72. Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses.

7.73. Modification 2 – Policy EMP4

- 7.74. Clarify the definition of “non-employment proposals” so that non-B1/B2/B8 uses capable of generating employment are properly treated as “employment uses”. Remove duplicated criteria already controlled via other policies.

7.75. Modification 3 – Supporting Text

- 7.76. Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales.

Conclusion

- 7.77. The evidence and policy context clearly support the continued allocation of the Site for employment, enterprise and commercial use. This is consistent with the Council’s own SPG and emerging LDP policies which aim to de-risk the under-delivery of employment land and job creation and enhance the Site’s potential to attract inward investment and high-value economic activity.
- 7.78. Amstone Developments Limited fully support that the RLDP allocates the Site for general employment use (B1, B2, and B8) with flexibility to accommodate complementary economic development, consistent with national guidance, the Use Classes Order (Wales), and market evidence.