

APPEAL BY: LEGAL & GENERAL (STRATEGIC LAND) LTD.

LAND AT MODEL FARM, PORT ROAD, RHOOSE

CLOSING STATEMENT

ON BEHALF OF THE LOCAL PLANNING AUTHORITY

1. The Vale of Glamorgan Council (“LPA”) has attended this inquiry in a neutral capacity. The planning history and the LPA’s position on this appeal are set out in the Opening Statement and are not repeated here [CD.6.9]. The LPA trusts that the Inspector has understood the history and the LPA’s position.
2. Consistent with its neutral position, the LPA has not produced any witnesses, nor cross-examined any of the witnesses of the other parties.
3. The LPA has answered questions of the Inspector, assisted the inquiry by engaging in the drafting of planning conditions and s.106 obligations and, at the request of PEDW, entered into a Statement of Common Ground with the Appellant.
4. The LPA emphasises that none of the answers provided to the questions put by the Inspector in the course of the Inquiry should be understood to depart from its neutral position. The case officer for the application answered questions about the Officer’s Report for the committee meeting of 1 March 2023, but his answers to those questions were to assist the Inspector and do not involve the LPA departing from that position.¹

¹ This was explicitly clarified in an exchange on Day 5 of the Inquiry (27 March 2026) at the close of the Inspector’s questions to Mr Rowlands (the LPA case officer). This exchange was between Mr Thomas, counsel for VCU, myself as counsel for the LPA and the Inspector. In that discussion it was made clear that the case officer’s response to a question about the compliance of the scheme with MG10 reflected the Officer’s Report and that the LPA was not taking a position different to that which is in the Officer’s Report. When the inquiry resumed after lunch on 27 March 2026 (Day 5 of the Inquiry), the Inspector acknowledged this.

5. Equally, as the Statement of Common Ground sets out at paragraph 1.1.2, in agreeing to the SoCG, the LPA does not depart from its neutral position.
6. Consistent with its position throughout the Inquiry the LPA, this closing statement provides no comments on the evidence submitted, nor the planning balance which is for the Inspector to determine.
7. The Inspector has asked for the Main Parties views on three points raised by Mr Wallis on behalf of Friends of the Earth, and Mr Clarke on Day 2 of the Inquiry.
8. In relation to the extension of time, the LPA's records which are available at CD6.52-56, show that the latest agreed extension of time to determine the application expired on 31 January 2023. A request was made by the LPA to extend the time period to determine the application on 27 February 2023, but there are no records of the Appellant agreeing to that extension of time. Notice of the Appeal was given on 29 March 2023 which was after the final agreed extension of time.
9. In relation to the other points raised, the LPA has had the opportunity to read the legal submissions submitted to the Inquiry by the Appellant on 8 April 2026 and agrees with the legal analysis contained therein and does not propose to comment further on Mr Wallis' submissions.

EMMA ROWLAND

Counsel for the LPA

FRANCIS TAYLOR BUILDING

10 APRIL 2026