

# LAND AT MODEL FARM, PORT ROAD, RHOOSE, VALE OF GLAMORGAN

Ref CAS – 02461-G8G7M5

Rebuttal Note to Viridian Landscape's appraisal of RPS/TT  
LVIA

Land At Model Farm,  
Rebuttal to Viridian  
Landscape's appraisal of  
RPS/TT LVA  
V3.0  
March 2026

## Introduction and professional background

- 1.1 This Rebuttal Note has been prepared by Mark Wilson, a Landscape Architect and a Chartered Member of the Landscape Institute (CMLI).
- 1.2 I confirm that this Rebuttal Note is true and has been prepared in accordance with the guidance of the Landscape Institute. I further confirm that the opinions expressed in my evidence are my true and professional opinions. I am aware that my duty as a professional landscape architect is to the Appeal process, irrespective of by whom I am employed.
- 1.3 This Rebuttal Note responds to Vale Communities Unite’s (VCU) material submitted via Mr Gibbs and the VCU’s comments arising from the public consultation on the ES during the adjournment. VCU has also produced a report by Viridian Landscapes, on which they rely and I respond to that report.
- 1.4 RPS was commissioned by Legal and General (Strategic Land) Ltd. to prepare a Landscape and Visual Impact Assessment (LVIA) as part of an Environmental Statement. My involvement with the Model Farm Business Park project started in 2018. My colleague Helen Donnelly, author of the original LVIA in July 2019 left RPS later that year. Building on the original LVIA I am author of the additional landscape and visual matters requested by in the ES Completeness Report issued by PEDW in respect of the appeal ref CAS-02641-G8G7MT on 12th June 2023. In addition to this Appeal Statement I will speak to the LVIA submitted as part of the ES application in 2019.

## Rebuttal Note to Viridian Landscape Planning appraisal of RPS/TT LVIA

- 1.5 This Rebuttal Note is in response to Viridian Landscape Planning’s appraisal / comments on the 2019 LVA produced by RPS/TT. It is provided at this stage in response to Mr Gibb's updated Statement.
- 1.6 The LVA ES Chapter was originally submitted in 2019 and the revised application was made in 2021 and is the subject of the Appeal, ref CAS-02641-G8G7MT made on 12th June 2023. Subsequently a revised LVIA was submitted in September 2024 as part of the Completeness Report requested by PEDW
- 1.7 Additional clarifications were provided in RPS’ Statement of Evidence (February 2025).
- 1.8 Viridian’s points refer to the 2019 LVA. The updated LVIA 2024 and the RPS Landscape and Visual Statement of Evidence address many of these.
- 1.9 This Rebuttal Note is presented as a summary of the key criticisms of the 2019 LVA by Viridian and in the VCU response to the ES together with my responses.

### Methodology and application of GLVIA3

- 1.10 **Viridian:** The LVA is inconsistent in applying its own methodology; omissions in the methodology make it hard to follow how effects were derived and lead to inconsistent application of the significance matrix.
- 1.11 **RPS Response:** RPS accepts that the 2019 LVA had some inconsistencies but these were corrected in the ES LVIA - Chapter 5 2024.
- 1.12 Corrections were made in the ES LVIA Methodology at Appendix 5.1.
- 1.13 The reference to Landscape Character Assessment Guidance for England and Scotland - (2002) Countryside Agency / Scottish Natural Heritage in the detailed methodology of the 2019 LVA was removed in later versions. It was a document used to inform ‘An Approach to Landscape Character Assessment’, Natural England (2014); - which includes a section on assessment in Wales, hence its relevance in the suite of guidance.
- 1.14 Winter photography was undertaken to latest Landscape Institute guidance TGN 06/19 for LVIA September 2024.

### Judgements of visual value and significance of effect

- 1.15 **Viridian:** No table of visual value judgments; inconsistencies between the significance matrix and the assessment of effects on landscape and visual receptors in the 2019 LVA text.
- 1.16 **RPS Response:** RPS acknowledge there is no table of visual value judgments in the original 2019 LVA but In the LVIA Methodology at Appendix 5.1, there is text that describes how visual value judgments were made. The ES LVIA Methodology states that *‘The value attached to a view includes a recognition of value through landscape designations, indicators of value attached to views by visitors such as the inclusion on maps or reference within guidebooks, provision of facilities, presence of interpretation boards, etc’.*
- 1.17 The categories of landscape and visual susceptibility, value and overall landscape sensitivity are stated in Appendix 5.1 - Table 1.
- 1.18 The inconsistencies identified by Viridian have been rectified in the updated ES LVIA and in clarifications given in the RPS Landscape and Visual Statement of Evidence. The points raised by Viridian are dealt with below:

## Landscape Effects

- 1.19 **Viridian:** At 7.2 the effect on site topography is stated as Medium magnitude, resulting in a Moderate effect. This is inconsistent with the results on Table 7 which shows Low magnitude, resulting in a Minor effect.
- 1.20 **RPS Response:** This comment seems out of date. ES Chapter 5; paragraph 5.6.2 & Table 5.4 provide assessment on direct effects on topography. They are consistent in judgements and level of effect - Medium Sensitivity, Medium Magnitude of Change - resulting in a Moderate effect.
- 1.21 **Viridian:** Table 1 Is a summary of effects on landscape elements, Table 3 is a summary of effects on visual receptors and representative viewpoints, but there is no Table 2 for effects on landscape characteristics.
- 1.22 **RPS Response:** This comment seems out of date. ES Chapter 5, Table 5.4 gives a summary of effects on landscape elements, Table 5.6 gives a summary of effects on visual receptors and representative viewpoints. Table 5.5 gives a summary of effects on landscape and Nant Llancarfan SLA
- 1.23 Section 8 is headed 'Effect on Landscape Character', but it is largely an analysis of existing landscape character. A comment on the predicted effects of the Proposed Development are added for Landform and Enclosure, Settlement pattern and Tranquillity, but not for Skylines Intervisibility.
- 1.24 **RPS Response:** This comment seems out of date. Assessment in relation to the skyline and intervisibility are dealt with in the text in Magnitude of Change sections for visual receptors eg residential receptors as is intervisibility between visual receptors and the proposed development.
- 1.25 **Viridian:** 8.1 concludes that 'As the proposed development would fit within the existing field boundaries, the landform...would not change...: However, that is clearly not the case, as can be seen on the Preliminary Site Levels plans UNY9969-RPS-0100 005 and 006) from the Planning Statement which show the contours across the site and the proposed levels of each development parcel. Filling on some plots includes existing levels raised by:
- 3m, 5m and 5m respectively on plots starting from the west on drawing 005; and
  - 3.5 m, 7.5 and 4m respectively on plots starting from the west on drawing 006,
  - Excavations on the same plots are as follows:
  - On drawing 005, excavated by 4m, over 5m and 1 .5m.
  - On drawing 006, excavated by 1 .5m. 1.5m and 2.5m along the northern edge.
- 1.26 **RPS Response:** The effects on local topography are assessed at 5.6.2 - of ES Chapter 5. 'The Magnitude of change is described as follows: 'The overall application site topography would remain largely unchanged, however within the site at a local level remodelling will be required especially for the larger building plots, site access roads and localised regrading to create level platforms by up to 5m. The Magnitude of Change is therefore considered to be Medium.'
- 1.27 **Viridian:** Section 8 concludes with a summary of the existing, landscape character, with no mention of effects of the Proposed Development.
- 1.28 **RPS Response:** This is incorrect. The effects of the Proposed Development are given throughout section 5.6 of ES Chapter 5.
- 1.29 **Viridian:** Section 9, which is headed 'Assessment of Landscape Character', is actually an assessment of effects on the landscape character of the Rhoose Hinterland Visual and Sensory Aspect Area. At. 4.45, the report stated that all five of the Visual and Sensory

*Aspect Areas which fall within the visual envelope of the Proposed Development have been assessed, but there seems to be no assessment of the other four areas.*

- 1.30 **RPS Response:** This is incorrect. The effects on landscape character are assessed throughout section 5.7 of ES Chapter 5. The following VSAs are assessed: Rhoose Hinterland Aspect Area, Porthkerry Country Park and Environs Aspect Area, Cardiff Wales Airport, Llancafarn and Waycock Valleys, Upper Waycock Valley/Dyffryn Area.
- 1.31 Furthermore, the other topic aspect areas are considered. In my SoE at paras 2.16 to 2.25, I consider the contribution the component Topic Aspect Areas make to the local landscape character and the effects on overall landscape character there in.
- 1.32 **Viridian:** *At 9.1, landscape character effects on the Rhoose Hinterland Visual and Sensory Aspect Area are set out: as Medium sensitivity and Low magnitude, resulting in a Moderate effect. However, according to Table 8 in the Methodology, this should result in a Minor effect.*
- 1.33 **RPS Response:** This is incorrect. Table 5.5 of ES Chapter 5 summarises the effects on the VSAA Rhoose Hinterland, and is consistent with the methodology and matrix in Appendix 5.1. Medium sensitivity, Low Magnitude of Change - resulting in a Minor significance of effect

**Visual Effects**

- 1.34 **Viridian :***In Section 10: Effect on Visual Amenity, there are inconsistencies between the text and the results shown on Table 3 for Welford Farm complex (10 1 ) The Stable - Porthkerry Farm (10 4) and Lower Porthkerry Farm (1 0.5): for Welford Farm the text states a High magnitude of change and a Substantial effect whereas Table 3 shows a Medium magnitude and Major effect; for Porthkerry Farm Stables the text states a Medium magnitude and Major effect, whereas Table 3 shows a Low magnitude and Moderate effect; for Lower Porthkerry Farm the text states a Major effect (which is consistent with Table 8 of the Methodology) but Table 3 shows a Moderate effect.*
- 1.35 **RPS Response:** Visual effects on these residential receptors are dealt with at 5.8.1 to 5.8.6 of Chapter 5 of the ES and summarised at Table 5.6. It is acknowledged that the judgements of significance of effect are inconsistent between text and table. Judgements of effect for The Stables Porthkerry Farm, Lower Porthkerry Farm and The Old Rectory are not consistent. The text at 5.8.5 and 5.8.6 is correct. - Table 5.6. in the ES LVIA has been updated below to reflect these changes.

**Revised Table 5.6 Summary of Effects on Property Receptors**

Visual Receptor/ Representative Viewpoint	Sensitivity	Magnitude of Change	Effect Year 1	Effect Year 10 with mitigation	Significant in EIA Terms?	Updated judgement from LVIA Sept 2024?
Welford Farm complex	High	High	Substantial	Moderate to Minor	Yes (short term)	No
New Farm Port Rd	High	Low	Moderate	Low	No	No
Upper Porthkerry Farm	High	Low	Moderate	Moderate to Minor	No	Yes
The Stable Porthkerry Farm	High	Medium	Moderate	Minor	No	No

Visual Receptor/ Representative Viewpoint	Sensitivity	Magnitude of Change	Effect Year 1	Effect Year 10 with mitigation	Significant in EIA Terms?	Updated judgement from LVIA Sept 2024?
Lower Porthkerry Farm	High	High	Substantial	Moderate to Minor	Yes (short term)	Yes
The Old Rectory	High	Low	Moderate	Minor	No	Yes

### Viewpoints and photographic representation

- 1.36 **Viridian:** Some viewpoints are not representative; some selected viewpoints and accompanying photographs/annotations do not adequately show the true visual effects. They recommended additional or alternative viewpoints where needed.
- 1.37 **RPS Response:** The viewpoint locations were agreed with the local planning authority as being representative of locations where the proposed development would be potentially visible and of greatest visual effect. Additional winter photography with annotations were produced, to GLVIA 3 TGN 06/19 guidance and can be found at Figure 8 in the September 2024 LVIA.

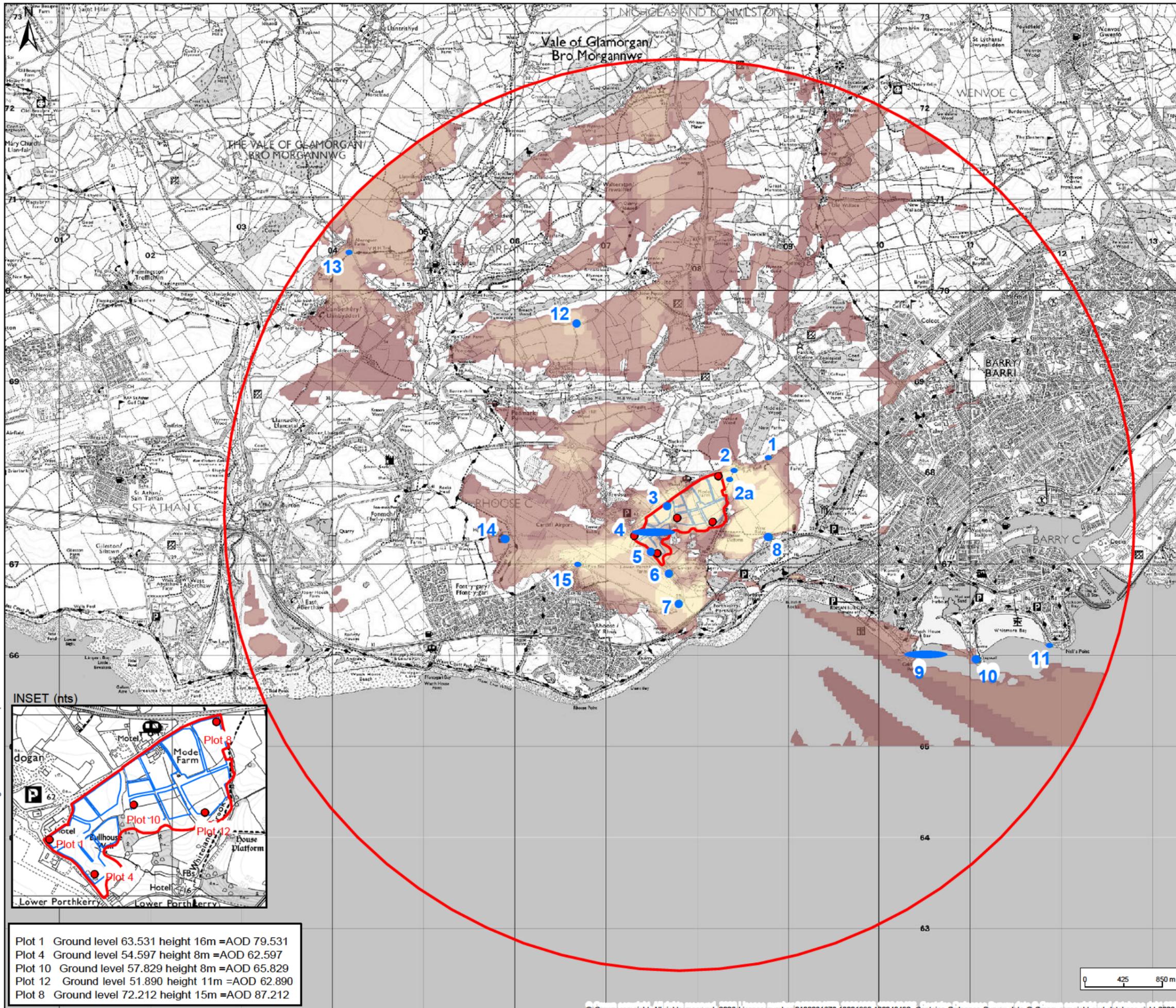
### Drawings, ZTV and plan information

- 1.38 **Viridian:** Drawings missing information referenced in text; inaccuracies in identification of the public footpath FP PROW P4/17/1 adjacent to the site along Whitelands Brook; ZTV building-height criteria unclear and viewpoint locations hard to distinguish on plans.
- 1.39 **RPS Response:** RPS rebut Viridian’s assertion of inaccuracies in the location of PRoW footpath PROW P4/17/1 and that the proposed building heights are missing for the purposes of modelling the Zone of Theoretical Visibility (ZTV). Additional figures have been produced and attached to this Rebuttal Note in relation to the above.

### Completeness and clarity for decision-makers

- 1.40 **Viridian:** Because of the issues above, the LVA is not a sufficiently robust document to accurately inform the determining authority of the likely effects of the proposals on landscape and visual receptors.
- 1.41 **RPS Response:** This Rebuttal Note responds to Viridian’s comments on the 2019 LVA. Many of which have been already addressed in ES Chapter 5 LVIA 2024. Individual points raised by Viridian are answered in this Rebuttal Note.
- 1.42 RPS has responded to comments by PEDW regarding the completeness of the ES in relation to the LVIA. The revised LVIA was submitted in September 2024. No comment was made by PEDW or the LPA as to the RPS LVA in 2019 being inadequate or at variance with guidance in GLVIA 3.
- 1.43 Further clarification is provided in the Landscape and Visual Statement of Evidence (February 2025). The assessment is in accordance with LI guidance in GLVIA 3 and fit for purpose in assessment of the landscape and visual effects of the proposed development and clearly states whether effects are significant or not.

## Figures



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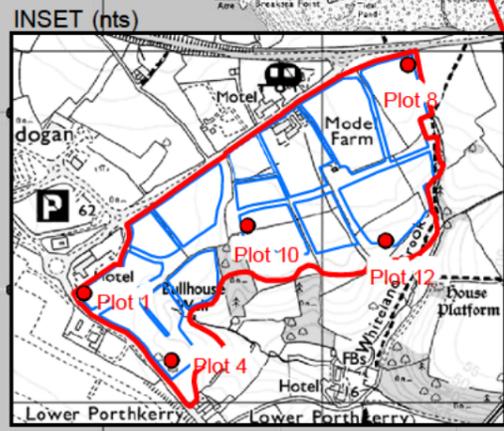
- Legend**
- 5km Study Area
  - Proposed development plots
  - ZTV Origin points
  - Application Site Boundary
  - 1 Viewpoint Locations

- ZTV Indicative extent of study area from which views to project buildings may be available
- 1 Origin Point
  - 2 Origin Points
  - 3 Origin Points
  - 4 Origin Points
  - 5 Origin Points

Notes:  
 The ZTV was computer generated using Key Terraforma (KTF) software. It has been generated using the top height of 5 buildings within the proposed development area and takes into account the visual screening offered by buildings (at 9m) and significant blocks of existing vegetation (at 12m) within the Study Area.

The ground model was developed using Ordnance Survey Terrain 5 Data.

B	ZTV origin heights revised	SH	HD	07/19
A	Inset added with ZTV origin point information	SH	KH	07/19
Rev	Description	By	CB	Date



Plot 1	Ground level 63.531 height 16m =AOD 79.531
Plot 4	Ground level 54.597 height 8m =AOD 62.597
Plot 10	Ground level 57.829 height 8m =AOD 65.829
Plot 12	Ground level 51.890 height 11m =AOD 62.890
Plot 8	Ground level 72.212 height 15m =AOD 87.212

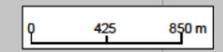
**rps** MAKING COMPLEX EASY

Lakesbury House, Hillingbury Road, Chandlers Ford, Hampshire SO53 5SS  
 T: [REDACTED]

Client Legal and General (Strategic Land) Ltd  
 Project Land at Rhoose  
 Title ZTV & Viewpoint Locations

Status Planning  
 Drawn By SH  
 PM/Checked By KH  
 Project Number JSL3282  
 Scale @ A3 1:40,000  
 Date Created JAN 2026  
 Figure Number 5  
 Rev B

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 Application Site Boundary

 Public Right of Way



Rev	Description	By	CB	Date



Lakesbury House, Hittingbury Road, Chandlers Ford, Hampshire SO53 5SS

T: 

Client **Legal & General (Strategic Land Ltd)**

Project **Model Farm, Rhoose**

Title **Property Locations & PRoW**

Status	Drawn By	PM/Checked by
DRAFT	CL	MW

Job Ref	Scale @ A3	Date Created
JSL3282	1:10,000	Jan 26

RPS Drawing / Figure Number	Rev
<b>Figure 9</b>	-

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