

Delivery Report Rebuttal

Project Title: Land at Model Farm, Port Road, Rhoose
Parc Busnes Porth Cymru (PBPC)

Date: 17 March 2026

This note has been prepared as a rebuttal to property and delivery matters submitted to the forthcoming Inquiry. This rebuttal statement complies with the requirements of the Royal Institution of Chartered Surveyors (RICS), as set down in the RICS practice statement 'Surveyors acting as expert witnesses'. I am Christopher Sutton BSc MRICS and the opinions I have expressed below represent my true and complete professional opinion on the matters to which they refer.

1. Introduction

1.1 This rebuttal responds to aspects of Mr Gibbs' Updated Statement of Evidence on behalf of VCU. Mr Gibbs suggests that the quantity of 'existing available sites' has increased since the application was submitted, citing, by way of example, Brocastle Bridgend Business Park. This is also a theme of comments put in by VCU and others during the consultation on the Environmental Statement which took place over the adjournment of the Inquiry.

1.2 I also provide commentary on other larger employment sites in the Vale of Glamorgan / Bridgend and the state of the market. I focus on the following sites, many of which have been raised by objectors:

1. Introduction / Regional location plan illustration large employment sites
2. The former Aberthaw Power Station
3. Bro Tathan (former RAF St Athan)
4. Brocastle strategic employment site
5. Former Ford Engine Plant, Bridgend
6. New CAVC Campus
7. Cardiff Airport MRO
8. Developability

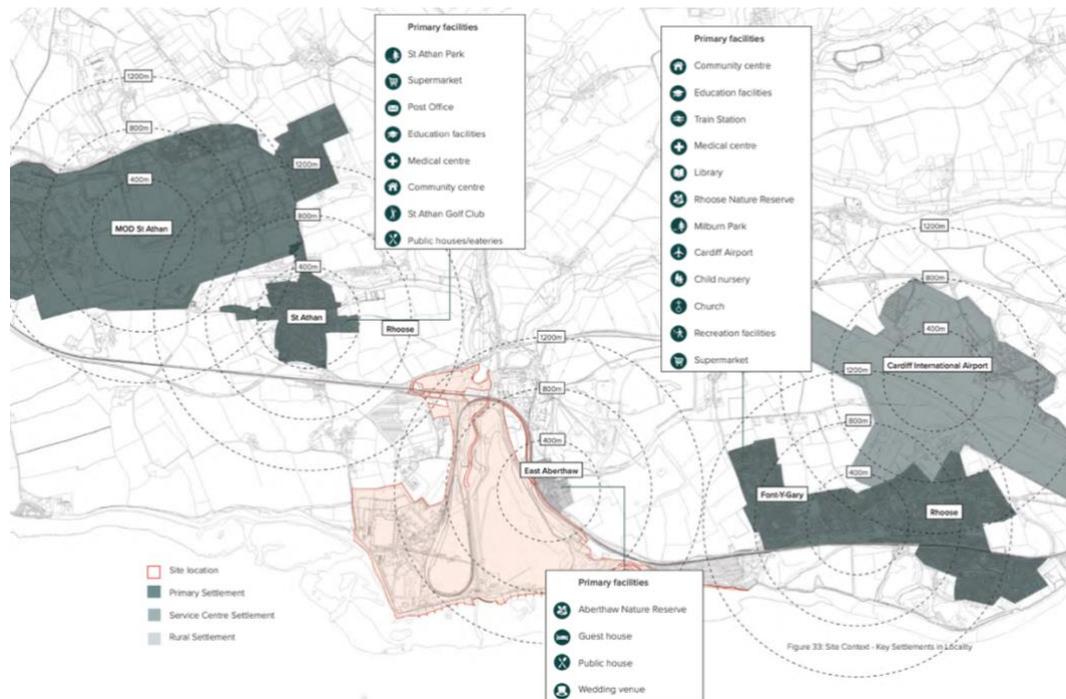
1.3 I then set this material in context with some comments on deliverability, since Mr Gibbs and VCU cast doubt on that aspect of the proposal, which they describe as 'speculative'.

1.4 As part of the context, I wish to draw attention to the fact that the Cardiff Airport and St Athan Enterprise Zone, sponsored by Welsh Government, remains in force. However, this has been joined by a further area based economic development initiative within Cardiff Capital Region (CCR) with the creation of the Cardiff & Newport Investment Zone, sponsored jointly by UK Government and Welsh Government. In addition, an AI Growth Zone will be located between Newport & Bridgend within CCR although precise locations have not yet been announced.

1.5 We also have the recent (26th February) announcement of a £50 million Wales Defence Growth Deal¹ reflecting the intense interest in the defence sector, including aerospace, at this time of geo-political uncertainty.

Regional location plans illustrating large employment sites

Location Plan - Bro Tathan, (ex-MOD), Aberthaw & Cardiff Airport



Location plan – Brocastle strategic employment site



¹ <https://www.gov.uk/government/news/wales-becomes-uk-launchpad-for-next-generation-autonomous-technology>

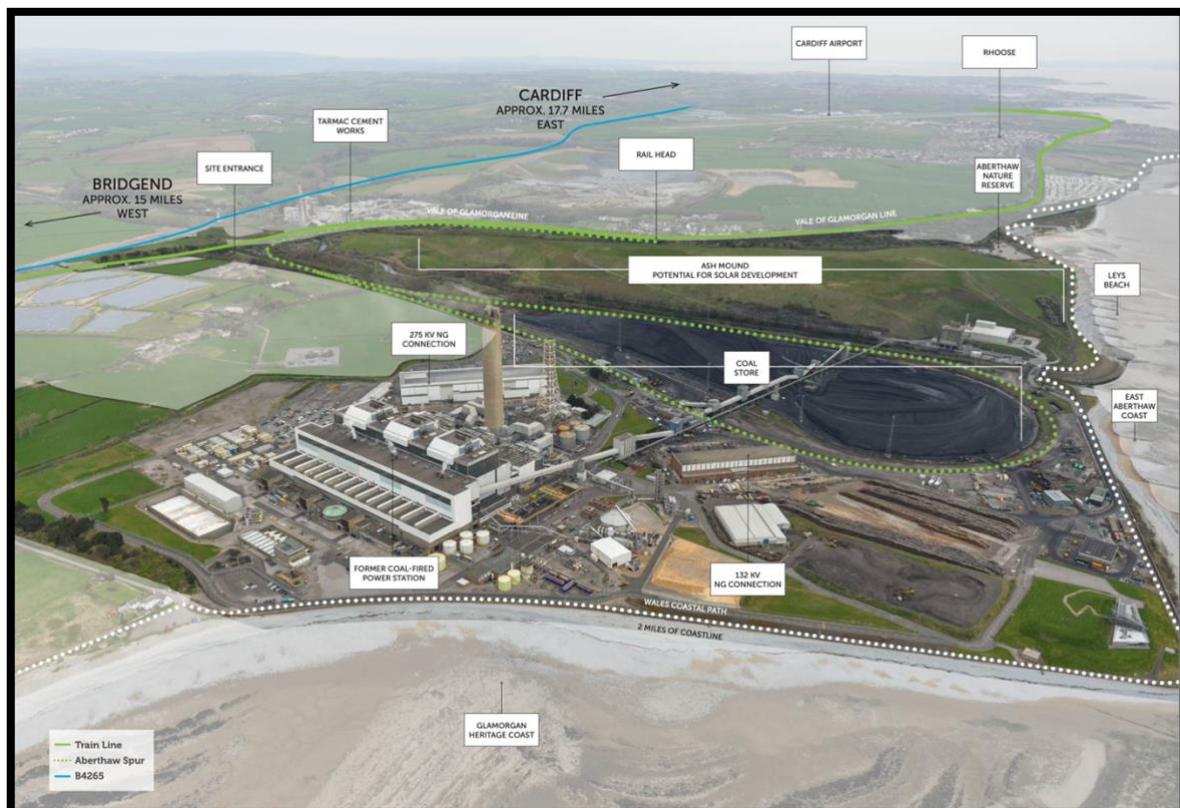
2. The former Aberthaw Power Station

2.1 CCR Energy Limited is a wholly owned subsidiary of the Cardiff Capital Region Corporate Joint Committee (a regional grouping of local authorities, formerly CCR City Deal). CCR Energy acquired the freehold interest in the 489 acre former coal-fired Aberthaw Power Station in March 2023 from former owner and operator RWE.

2.2 The site was acquired for circa £8.7 million knowing a further sum in the region of £30 million was required to demolish the power station structure and to remediate the subject site, ready for development. There has been a well-publicised dispute regarding the awarding of the demolition contract however this has been settled, and site preparation is ongoing with a demolition handover date for a clear site of 2028. There will be a developable area of circa 150 acres on and around the site of the former power station and associated coal yards. There is also a large tip comprising circa 18m tonnes of pulverised fuel ash (PFA) which may offer processing or aggregates uses.

2.3 The site contains a major National Grid (NG) sub-station and NG wish to acquire circa 20 acres of land to upgrade and expand the substation. RWE also has an 'Option Site' of 19 acres, negotiated at the time of the sale, for the specific purposes of facilitating either a marine energy or grid balancing project.

Extract from Aberthaw initial masterplan (The Urbanists 2023)



2.4 In March 2024 the West of England Mayoral Authority and CCR undertook a study on the potential for tidal energy generation in the Severn Estuary. Slides from a public presentation in late 2025 highlight the potential for a tidal lagoon adjacent to Aberthaw.

Severn Estuary Commission

The Severn Estuary Commission was launched in March 2024 by the Western Gateway, a partnership of 28 local authorities for South Wales and Western England.

Engaged with over 200 organisations – government departments, regulators, ports, industry, eNGOs.

In March 2025 concluded that development of tidal range energy in the Severn Estuary is feasible and should begin with a **Commercial Demonstration Project – a tidal lagoon** – through a public sector led Project Delivery Vehicle.

Screening Process

Purpose

- Identify potential locations in the Severn Estuary and Bristol Channel suitable for a tidal lagoon.
- Inform indicative costings and programme assumptions for future development stages.
- Focus detailed assessment on the most technically feasible and environmentally acceptable sites.

Approach

- Considered tidal range, proximity to ports and navigation routes, environmental designations, and existing coastal uses.

Outcome

- Shortlisted locations with strong tidal potential and lower environmental and navigational constraints.

2.5 The site is a heavy industrial brownfield site which CCR Energy is hoping will become a focal point for green energy innovation using the grid connectivity, rail head and marine / tidal opportunities. This a long-term project with the upgraded NG substation unlikely to be fully operational before 2035.

2.6 I have spoken to Nicola Somerville of CCR Energy Limited. She has confirmed that the current focus of CCR Energy is to complete the site remediation by 2028. Thereafter, the site should be brought forward for strategic employment with a strategic focus upon energy generation and high energy users, data and specialist manufacturing processes, potentially including green industries such as sustainable aviation fuel. As highlighted above, interest has been expressed in the site for tidal energy and there has also been interest from SMR nuclear developers. There could also be direct wire electricity connections to the airport in the future.

2.7 Ms Somerville suggested that CCR Energy would like Aberthaw to be brought forward as part of a balanced portfolio of employment sites across the Vale of Glamorgan. In this context, the Airport should offer a higher profile location in a business park setting whilst Aberthaw is a large-scale strategic employment site being a former heavy industrial site with significant grid connections, rail siding and marine frontage. Aberthaw offers different opportunities to both Bro Tathan and the Airport for uses such as energy generation and industrial processes.

Aberthaw v Appeal Site

2.8 The Aberthaw site is substantially different to the Appeal Site which is greenfield and would offer a higher profile and more landscaped site. Aberthaw is a heavy industrial brownfield site with minimal road frontage but with other unique characteristics in terms of rail and marine frontage. The Appeal Site provides a business park setting which may be more attractive for a headquarters facility both in terms of being more customer facing and a more attractive venue to work in.

3. Bro Tathan (former RAF St Athan)

3.1 Bro Tathan is the name adopted in 2019 for the marketing of the West Camp of the former RAF St Athan heavy maintenance airbase. The West Camp was acquired by Welsh Government from the MOD with the East Camp remaining in the ownership of the MOD although there are moves to transfer part to WG.

3.2 Ecube, an aircraft recycler is located on the site and Aston Martin occupies the 300,000 sq ft former 'MOD super hangar' under a long lease. Vantage Data Centers (VDC) acquired 22 acres for a data centre (CWL13) and VDC has a power connection to the NG substation at Aberthaw.

3.3 One large industrial site remains at West Camp, namely Kilo Romeo. Kilo Romeo is a 17-acre site suited for Maintenance, Repair & Overhaul Operations (MRO) with planning consent for up to 400,000 sq ft of floorspace with airside access to runways and taxiways. Additionally, Y Porth, totalling 17.2 acres, is intended to be a strategic gateway to the park providing room for offices, hotel, retail, leisure and showroom uses.

Bro Tathan (former RAF St Athan) - plan illustrating 17 acre 'Kilo Romeo' airside development site and 17.2 acre Y Porth mixed use site



Bro Tathan v Appeal Site

3.4 Kilo Romeo is the last remaining industrial site on the West Camp and caters for potential airside demand with direct access to a runway. This is a site with specific characteristics which are different to the Appeal Site.

4. Brocastle strategic employment site

4.1 Brocastle has been serviced by Welsh Government and brought forward for development. The initial decision to service the land was taken following the agreement in late 2019 for a sale of most of the site to Ineos Grenadier for the development of a car plant (to assemble up to 25,000 SUVs a year). In 2020 this project went away when a fully fitted car plant became available in France; Ineos acquiring the Hambach site from Daimler.

4.2 In 2020 the Brocastle site was marketed by property consultants JLL and placed under offer in two parts: (1) a data centre operator and (2) a Bridgend manufacturer seeking a relocation site for expansion. The underbidder at that time was a film studio developer (I acted for the film studio). All these projects fell through; Vantage Data Centers progressed alternative sites at Bro Tathan and the former Ford factory in Bridgend whilst film studio demand slowed due to the writers' strike in the US.

4.3 Kate Openshaw of JLL has confirmed the following current position (March 2026):

- Quoting £275,000 per acre with a 'quality threshold' in terms of uses imposed by Welsh Government. This threshold removes any sales for open storage, contractors' yard or low density development.
- Plot 5 (4.855 acres) under offer to a developer seeking to bring forward a speculative 57,000 sq ft unit which is likely to be marketed at £10+ per sq ft. The developer is in advanced discussion with the Development Bank for Wales to secure Property Development Grant to aid any viability gap.
- Plot 3 (3.928 acres) has advanced interest from an owner occupier.

4.4 An extract from the marketing brochure is set out below.

Brocastle v Appeal Site

4.5 Brocastle offers a landscaped site with fully serviced development sites. The marketing programme has been disrupted by the decision from Ineos Grenadier to withdraw and then three 20-30 acre projects falling away - that is the nature of the property development market.

4.6 Of all the large-scale employment sites considered in this paper, Brocastle is most directly comparable to the Appeal Site although is not located within an Enterprise Zone and does not benefit from the proximity of an Airport or 'Advanced Technology Centre' FE College. The landowner (Welsh Government) has declined to develop floorspace either on a speculative or pre-let basis, however sites are now under offer and new activity on site should generate further interest.

Brocastle – extract from JLL marketing particulars

Brocastle

Plots available from 2.7 acres to 10.6 acres

Fully serviced plots close to M4 Motorway

116 Acre Development Site

Planning

The development has outline planning consent for B1, B2 & B8 uses. Please refer to the Data Room for further information.

Services

Services are provided to the boundary of the plots.

VAT

All figures quoted are exclusive of VAT which will be charged in addition at the prevailing rate.

Development Information

Further information on the site is contained within the Data Room. Please contact JLL to request access.

Sustainable Building Standards

All developments will be required to be built to Welsh Government's sustainable building standards.

Virtual flight

To view drone footage click here.

Active Travel Route

The new active travel route was completed in 2023 and runs parallel with the A48 running from the roundabout at the entrance to the Brocastle site, to the South-West for c. 2km to Waterton roundabout.

This new travel route features a 2km cycleway and new signalised road crossings and street lighting – enhancing the accessibility of the site to occupiers looking to reduce car traffic and encourage sustainable travel.

Plot	Size (Acres)
1	4.146
2	10.564
3	3.928
4	6.981
5	4.855
6	2.671
7	4.047
8	4.702
9	2.910

Plots available by way of a long leasehold sale.

5. Former Ford Engine Plant, Bridgend

5.1 Acquired by Vantage Data Centers, the former engine plant comprised 2 million sq ft on a site of circa 120 acres gross (80 acres net), constructed in the late 1970s. The purchase price was c. £30m and initial consultations suggest Vantage propose a 'European leading data farm' comprising up to 10no. data centres and 3 sub-stations.

Former Ford engine plant, Bridgend – acquired by Vantage Data Centers (photo: CBRE)



Extract from Vantage Data Centers outline planning application for ex-Ford, Bridgend illustrating proposed 'cloud triangle' planned for southern Vale of Glamorgan²

A Cloud Region in Wales

Vantage's investment is based on a three-pronged infrastructure development plan initially centring around Imperial Park, Bro Tathan, and the old Ford site in Bridgend. These three locations would form the cornerstones of a Welsh cloud region.

In Wales, as with all Cloud regions, success requires the creation of 'availability zones'. These zones work on a triangular principle; where there must be three, independent clusters – or availability zones - of data centers, at defined distances relative to each other. This, to ensure high resiliency, redundancy, and capacity with minimal latency for the cloud to operate in a stable, and secure manner.

In Wales we are in the process of establishing the three infrastructural corners of this triangular ecosystem for a new cloud region. The first corner is Imperial Park, the second would be Bro Tathan, and the third would be Bridgend.

A Cloud region cannot exist without the three corners; making it critical for the full triangle to work in harmony and be developed in conjunction with one another. Successfully launching a complete cloud region – i.e. all three availability zones – is what will bring maximum benefit to the Welsh economy.



² https://democratic.bridgend.gov.uk/documents/s36191/Officers%20Report_P25247HYB.pdf

Former Ford Engine Plant v Appeal Site

5.2 The Ford Engine Plant was a high-profile factory closure announced in 2019 which released a large brownfield site onto the market with grid connectivity. The sale to Vantage illustrates how one single enquiry can take a large, allocated site of 120 acres (gross area) out of the market.

5.3 The Appeal Site has different characteristics being located 10 miles further away from the M4 motorway yet having proximity to an Airport. The Appeal Site is greenfield and offers a more attractive business park setting than Waterton Industrial Estate, Bridgend.

6. New CAVC Campus

6.1 The proposed 'Advanced Technology Campus' is under construction adjacent to Cardiff Airport, having secured planning approval in May 2025. As I said in my Statement of Evidence, it is more than a standard College. Whilst 50% of 16-18 year olds will complete the usual courses, the remainder will comprise apprentices, part-time and work-related learning.

6.2 It is proposed that the Campus will have a focus upon green skills including net zero retrofit. In addition, standard activities such as engineering will include composites, robotics, AI and research led activities within clean rooms. CAVC have partnerships with Cardiff Met, USW and Kingston University, the latter being the accreditor of specialist aviation courses. Funding is under the Mutual Investment Model.

6.3 Under the land transfer from the Council to CAVC, there is an agreed list of potential land uses which will not be allowed on the Council's retained land, to protect the learning environment. We understand these are, in the main, lower order uses better suited to scruffy local trading estates.

Relationship with the Appeal Site

6.4 The Advanced Technology Campus has been approved and is under construction. This will create a landmark skills-based educational facility located immediately adjacent to the Appeal Site. The development of skills is a key factor in creating an attractive business environment and therefore the proximity of the College will create a selling point for prospective occupiers of the Appeal Site. The College may generate future enquiries for innovation space and will generate demand for improved public transport.

7. Cardiff Airport MRO

7.1 In February 2025, I spoke to Mr Jonathan Moody, Head of Aviation, Ports and Logistics at Welsh Government.

7.2 **Airside Maintenance, Repair & Overhaul (MRO) opportunities** – Welsh Government believes that Cardiff Airport offers a credible and strategic location for additional MRO

development. This is because it is a UK location with proximity to London and the south-east whilst also offering a workforce with a skilled engineering background and a critical mass of similar users in the area including BAMC, GE Engines, Aston Martin, Tata, Ford (closed but the workforce remains), Airbus (Filton), GKN (Avonmouth) and many others. We understand Welsh Government has received credible MRO enquiries. There is a lack of immediately available flat development land with direct access to the runway at Cardiff airport, although the southern half of the cross runway (with highways issues), or land adjacent to BAMC, may offer limited opportunities.

7.3 There is a steady flow of aviation related projects across South Wales. These may not require airside sites located immediately adjacent to a runway but will require Grade A floorspace suitable for a value-added business. Recent aviation projects across Cardiff Capital Region include:

- **Aerfin Limited** (components) – 116,589 sq ft, Indurent Park, Newport (paying £8.75 per sq ft) 2024.
- **Aero Engines Limited** (parts supplier) – 10,000 sq ft, Capital Business Park, Wentloog, Cardiff (paying £100 per sq ft for ground lease) 2024.
- **Safran (formerly Zodiac)** (seat manufacturer) – 131,000 sq ft, Units IP1/IP2 Imperial Park, Newport (paying £7.50 per sq ft leasehold) 2018.
- **Ecube** (aircraft dismantling) – large site at Bro Tathan which opened in 2012. In January 2024 it completed the dismantling of its 400th aircraft.

7.4 A business park located adjacent to Cardiff International Airport has the potential to create a cluster of future aviation sector projects alongside similar related value-added industrial sectors including composites, advanced engineering, life sciences and cyber.

8. Developability

8.1 Mr Gibbs suggests that the Appeal Site, if granted planning permission will ‘stand empty’, like plots of land at Brocastle Business Park. I have commented on that site and explained its circumstances above.

8.2 Mr Gibbs also describes the Appeal Scheme as ‘speculative’. As I explained in my Statement of Evidence, the availability of strategic sites and premises is of great importance to the regional and Welsh economy. I described the network of such sites as a ‘structural weakness’, in the absence of any substantial public sector development programme.

8.3 The allocation and delivery of employment sites across Cardiff Capital Region is vital for the economic health of the region. A balanced portfolio of employment sites will provide existing and emerging businesses with a location to establish themselves and grow, thereby creating investment, supply chain opportunities and employment. The Appeal Site cannot be marketed until there is a clear pathway for delivery including planning, servicing and removal of other development constraints. The site may not have a list of named occupiers for it at present but there is confidence that enquiries can be attracted having regard to the

slow but steady pipeline of transactions including Aston Martin at Bro Tathan, Vantage at Bridgend, past enquiries on Brocastle and the diverse enquiries received for Aberthaw.

8.4 Whilst the viability studies previously undertaken highlight a marginal position at best, this is typical of many employment sites. A case should be made for public sector intervention funding to assist site preparation and / or viability gap funding to help deliver new floorspace (see reference to Property Development Grant from DBW at Brocastle). Freehold sales may generate a higher return than investment sales which may improve viability whilst capital intensive projects or time sensitive projects may be less sensitive to viability concerns on a building envelope.

8.5 Between 2019 and 2024 there were significant changes to the property market indicating the dynamic forces evident in the commercial property market. Factors such as the final withdrawal from the EU, Covid-19 and rising utility prices / inflation have all had an impact upon the market.

8.6 'Events' can have a direct impact upon market demand with, for example, the pandemic changing the nature of the office market with occupiers generally seeking higher quality but smaller footprints. We see reshoring back to the UK of critical industries and strengthened demand in certain sectors of the economy with the renewed focus upon the defence sector a topical example.

8.7 We cannot be certain at this stage about the quantum of floorspace and types of users likely to come forward on the subject site. Draft conditions and parameters set the framework, and this is likely to be developed into a 'quality threshold' to ensure the development of a high quality business park which will offer room for value-added hi-tech manufacturing to grow alongside ancillary developments, including occupiers directly associated with the airport.

8.8 Regional policy tends to target high value-added employment uses often associated with advanced manufacturing, life sciences, offices, hybrid research & development units etc. These are uses which are usually associated with use class B1, usually combined with an attractive business park environment enjoying good connectivity and access to skilled labour.

8.9 There is a lack of employment land generally, and specifically for relevant B1 development, in the 'greater Cardiff' area. The lack of employment sites of scale was reinforced by the publication of Cardiff's RLDP which allocated its only large-scale strategic employment site at the east of the city (Cardiff Parkway).

8.10 The southern half of the Vale of Glamorgan can provide an attractive environment for employment with connectivity and access to skills, the latter soon to be bolstered by the Cardiff & Vale College investment.

Scheme commencement

8.11 The timescale for scheme commencement is subject to site servicing, removal of development constraints and market demand. However, there is now increased activity at the Airport with CAVC under construction.

Lifespan of scheme

8.12 Timescales are difficult to pin down. However, Indurent Park in Newport (formerly St Modwen Park) provides a real-world guide to timescales with the last phase of the 100 acre site recently commissioned, 10 years after the first phase was completed. The scheme is also notable for the rise in Grade A industrial rental levels over the last decade.

Indurent Park, Llanwern, Newport – first letting in 2016 and final phase commissioned in 2026 for delivery in 2027 (100 acre site)



End.