



# Planning and Design and Access Statement

Proposed Plasterboard Manufacturing Facility, Port of Newport

For Associated British Ports

Adams Hendry Consulting Ltd.

January 2020

Title

Planning and Design and Access Statement

Client

Associated British Ports

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# 1 Introduction

- 1.1 This Planning and Design and Access Statement has been prepared by Adams Hendry Consulting Ltd on behalf of Associated British Ports (ABP). The statement is in support of an application for planning permission for a new plasterboard manufacturing facility located at 15 Tom Lewis Way within the Port of Newport (the proposed development).

## The Applicant

- 1.2 The application is made by Associated British Ports (ABP), which owns and operates the Port of Newport.
- 1.3 The application seeks consent for a new facility to be operated by a plasterboard manufacturing company. Upon completion of the facility, the site will be leased to the plasterboard manufacturer by ABP. As the identity of the company is currently commercially sensitive, it is referred to as 'the occupier' throughout this document.

## Environmental Impact Assessment (EIA)

- 1.4 NCC issued an EIA Screening Opinion on 16<sup>th</sup> December 2019 confirming that the proposed development does not fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations).

## Sustainable Urban Drainage System (SuDS) Application

- 1.5 Separate to the planning application, a SuDS application will also be made in accordance with Schedule 3 to the Flood and Water Management Act 2010 and the relevant supporting statutory instruments.

## Habitat Regulations Assessment

- 1.6 Where a development project is located close to, or within an area designated under Regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) (referred to as the Habitats Regulations) the requirements of Part 6 of the Habitat Regulations apply. In essence, this requires the Competent Authority to determine whether there is potential for a likely significant effect (LSE) on a European Site and, if there is, to undertake an Appropriate Assessment (AA) of the implications of the proposed development in light of the site's conservation objectives.

- 1.7 A Technical Report to Inform Habitats Regulation Assessment is submitted as part of this planning application. Given the proximity of the proposed development to the Severn Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site, as well as the River Usk SAC (see section 2 for the context of the proposed development), and the potential for LSE, the information to inform an AA is provided as part of this technical report.
- 1.8 With regard to the potential implications of the proposed development on the nearby European Sites, the technical report concludes that disturbance effects (air emissions, noise, lighting, reduced water quality) can be mitigated by the implementation of construction industry best practice measures and through design and operational procedures of the manufacturing facility. Details of measures to be employed during the construction phase of the development will be provided within the Construction Environmental Management Plan (CEMP). With the implementation of mitigation measures there will be no adverse disturbance effects arising from the project, or in combination with other developments, on the ecological integrity of the Severn Estuary SPA, SAC and Ramsar site and River Usk SAC.

## Format of this Statement

- 1.9 This statement explains the approach taken by the applicant and its advisors in planning and designing the proposed development and provides additional explanatory information to support the planning application. The format of this supporting statement is as follows:
- Section 2 of this report sets out the context of the proposed development, including a description of the site and its surroundings;
  - Section 3 sets out the need for the proposed development and the design context, having regard to the operational requirements of the occupier;
  - Section 4 describes the development proposals including design considerations;
  - Section 5 analyses the key planning and environmental issues
  - Section 6 provides a sustainable development appraisal; and
  - Section 7 draws conclusions from the preceding sections.
- 1.10 The following documents are submitted with the planning application:
- the planning application form and completed certificate of ownership;
  - plans and drawings as set out in the table below;
  - Planning and Design and Access Statement (this document);
  - Pre-Application Consultation report (NB: This will be included following statutory pre-application consultation);
  - Air Quality Assessment;
  - Arboricultural Assessment
  - Ecological Impact Assessment (EclA) Report and Biodiversity Surveys (including habitat, breeding/nesting birds, bat, reptile and invertebrate surveys);
  - Technical Report to Inform Habitats Regulation Assessment (included as Appendix 1 of the EclA);
  - Ecological Management Plan;
  - Flood Consequences Assessment and Sustainable Drainage Strategy;
  - Heritage Impact Assessment;
  - Landscape and Visual Impact Appraisal and Landscape Strategy;
  - Noise Impact Assessment;

- Construction Environmental Management Plan (CEMP)
- Phase 1 Geo Environmental and Geotechnical Desk Study;
- Site Waste and Natural Material Management Plan (SWNMMP); and
- Transport Assessment.

1.11 The plans and drawings accompanying this application comprise:

*Table 1.1: Planning application drawings*

Title/Description	Plan Number	Revision
Site Location Plan	153091-STL-00-00-DR-A-ZZZZ- <b>00002</b>	P30
Proposed Site Plan	153091-STL-00-00-DR-A-ZZZZ- <b>01001</b>	P30
Proposed General Arrangement Floor Plan – Level 00	153091-STL-00-00-DR-A-ZZZZ- <b>01002</b>	P29
Proposed General Arrangement Floor Plan – Level 01	153091-STL-00-01-DR-A-ZZZZ- <b>01003</b>	P29
Proposed Roof Plan	153091-STL-00-02-DR-A-ZZZZ- <b>01004</b>	P29
Proposed Elevations	153091-STL-00-ZZ-DR-A-ZZZZ- <b>02001</b>	P29
Proposed Site Sections and Finished Floor and Site Levels	153091-STL-00-ZZ-DR-A-ZZZZ- <b>03001</b>	P29
Existing and Proposed Site Levels	153091-STL-00-00-DR-A-ZZZZ- <b>00003</b>	P30
Indicative Earthworks Sections	72689-CUR-00-XX-DR-C- <b>SK001</b>	P04
Proposed Drainage Strategy	72689-CUR-00-XX-DR-C- <b>92000</b>	P05

*\* Plan numbers referred to in this report only include the last digits shown above in **bold**.*

## 2 Context of the Proposed Development

### The Site

- 2.1 The site of the proposed development comprises an area of currently unused land located south-west of the South Dock within the Port of Newport. The total site area is 4.52ha, as shown outlined in red on the location plan (drawing number **00002**). The area of the site to be developed for the proposed manufacturing facility is approximately 3.44ha, as shown on the site plan (drawing number **01001**).
- 2.2 The remaining 1.08ha consists of existing vegetation and habitats: namely an area of approximately 0.56ha south of the proposed development site, and approximately 0.52ha of vegetation along the western boundary to be maintained for habitat connectivity.
- 2.3 The site of the proposed facility currently comprises bare ground and asphalt, with exposed foundations and rubble associated with previous uses, and dense and scattered scrub and other vegetation. There are several installed concrete piles around the site, all standing proud of the surface between 1m to 10m above ground level. The soil profile of the site consists of made ground over alluvial clay (with peat deposits), over granular alluvial deposits (sand, gravel and cobbles), over Mercia Mudstone. The site is generally level and is mainly bounded by a mix of fencing and vegetation.
- 2.4 Existing gates in the north-east of the site provide access to the site from Tom Lewis Way, an internal private dock road. Access from Tom Lewis Way is achieved via West Way Road, which is also an internal private dock road. Access into the Port of Newport is controlled, and the internal roads are not part of the public highway network.
- 2.5 The site of the proposed facility has consisted of made ground since Newport Docks were extended in this area in 1907 and 1914. Since then, the site has had various uses, including a car storage facility in the 1990s until the early 2000s, ad-hoc cargo storage and other port related uses. In 2009, planning permission was granted for a new biomass plant on the site (application reference no. 08/1257). Subsequently, permission was granted in 2012 to remove condition 9 of permission 08/1257 relating to full details of building construction (application reference no. 12/0182), following changes to the scheme. These permissions were never implemented. The site is therefore currently vacant.
- 2.6 In 2010, an application was made to the then Department of Energy and Climate Change (DECC) for consent to erect an overhead power line connecting the national power distribution network to the biomass plant proposed on the site, under Section 37 of the Electricity Act 1989. As with the biomass plant, this proposal was never implemented. Documents relating to this application are available on the NCC planning application portal under reference 10/0129.

## The Surroundings

- 2.7 The site is located on land within the operational Port of Newport. The Port of Newport is a major UK deep water port, with an enclosed dock system which includes both North and South Docks. The port estate is well developed, comprising operational port land and strategic development land banks (which the proposed development site is part of). The land use reflects the variety of tenants and trades within the port.
- 2.8 The main trades handled at the Port of Newport include steel, dry bulks and renewable energy cargoes. The dry bulk cargoes handled include aggregates, coal, coke, clay, and agribulks. The Port provides a number of warehousing and open storage facilities for handled cargoes.
- 2.9 The port is a hub of economic activity for the city and wider region. It provides a gateway for business engaged in international trade for the supply of raw materials and access to overseas markets for exports of finished goods. This helps to sustain and support the growth in employment and attract inward investment to the port and its hinterland.
- 2.10 The site itself is bounded by Tom Lewis Way, an internal private dock road, to the east. Across the road to the north-east is the South Dock, and to the south-east is a sand terminal and site operated by Severn Sands Limited. The Severn Sands site contains several warehouse buildings and large open storage areas.
- 2.11 Amongst other facilities and infrastructure, the South Dock has a coal and minerals quay offering storage for more than 80,000 tonnes of cargo, with direct rail access. It is equipped with specialist grabbing cranes and a dust suppression system, drainage interceptor, fencing and an environmental bund wall. The coal and minerals quay is located beyond the Severn Sands site and the South Lock.
- 2.12 To the north of the site is an area occupied by Speedy Hire, which provide tools, plant and specialist equipment for hire. The Speedy Hire site includes a large warehouse and ancillary buildings. To the north-east of the Speedy Hire site is the site of the proposed energy centre and associated development, to be operated by Vo-Gen Energy Limited.
- 2.13 Directly to the south of the site of the proposed manufacturing facility is an approximate 0.8ha area of land, reserved for future strategic port development. Beyond this is a proposed habitat enhancement area within the site, an area of approximately 0.56 hectares, the proposals for which are described further in section 4 of this document, and within the EclA submitted with this planning application. As with the proposed manufacturing facility site, both of these areas are currently disused land, comprising bare made ground and asphalt, with exposed foundations and rubble associated with previous uses, and dense and scattered scrub and other vegetation.
- 2.14 Immediately to the west of the site are areas of vegetation, beyond which is the River Ebbw, beyond which are the Gwent Levels. An area of approximately 0.52 ha of vegetation in the west of the site is to be maintained for habitat connectivity as part of the proposed development. The proposals for this area are described further in section 4 of this document and within the EclA submitted with this planning application.
- 2.15 The nearest residential area is Tredegar Park, located approximately 1.2km to the west of the site.



- 2.16 Tom Lewis Way is accessed via West Way Road within the Port of Newport. West Way Road is accessed from Docks Way, which connects to the A48. The A48 connects to the M4 at Junction 28 to the west and Junction 24 to the east, providing access to the national motorway network. The Port can also be accessed via East Way Road, which also connects to the A48.
- 2.17 Barriers and security kiosks are located at the entrances to the Port on West Way Road and East Way Road, providing secure access to the Port, which is a controlled area.
- 2.18 Marine access to the Port is from the River Usk via the entrance lock located in the south west corner of South Dock. Access to the River Usk is obtained from the Severn Estuary.
- 2.19 The vast majority of the site of the proposed manufacturing facility lies within Flood Zone C2. The habitat corridor, and habitat enhancement area to the south, are both within Zone C2. Flood Zone C2 denotes areas of the floodplain without significant flood defence infrastructure. Part of the north eastern corner of the proposed manufacturing facility site lies within the Flood Zone B. Flood Zone B denotes areas known to have been flooded in the past.
- 2.20 Environmental designations and constraints relating to the site and surrounding area are shown on Figure 1.
- 2.21 The area of the River Ebbw to the west of the site, along with much of the Severn Estuary further south, are within the Severn Estuary Site of Special Scientific Interest (SSSI). West of the River Ebbw, and approximately 165m away from the proposed manufacturing facility site, is the Gwent Levels St. Brides SSSI.
- 2.22 The Severn Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site covers a section of the River Ebbw west of the proposed manufacturing facility site, located approximately 110m away from the site. The River Usk SAC is also located approximately 365m to the south-east of the proposed manufacturing facility site.
- 2.23 The Newport Wetlands, approximately 630m south-east of the proposed manufacturing facility site, is a National Nature Reserve (NNR) and is also within the Severn Estuary SSSI.
- 2.24 An area of the River Ebbw to the west and north-west of the proposed manufacturing facility site is designated as a Site of Importance for Nature Conservation (SINC).
- 2.25 The proposed development site is not within an Air Quality Management Area (AQMA).
- 2.26 The Gwent Levels, located to the west of the site across the River Ebbw, is an Historic Landscape of Outstanding Historic Interest. This is a non-statutory designation that aims to recognise the value of historic landscapes and raise awareness of their importance.
- 2.27 There are no listed buildings within 1km of the proposed development site. There are no Scheduled Ancient Monuments within the immediate vicinity of the site. The closest one—Castell Glas Castle Mound—is approximately 1.83km away from the proposed manufacturing facility site. There are no Historical Parks within the immediate vicinity of the site, the nearest one being over 2km away.

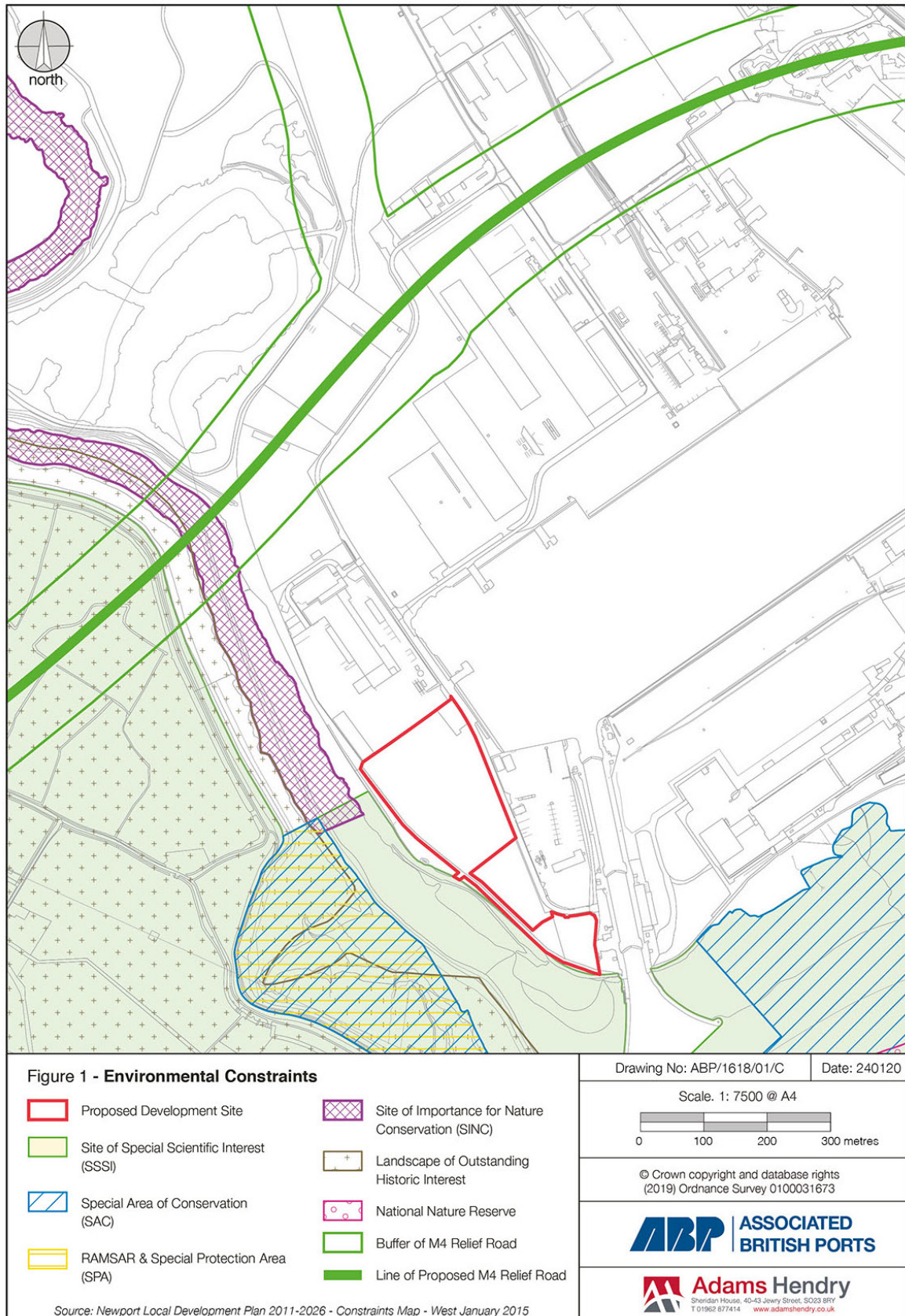


Figure 1: Environmental constraints

# 3 Need for the Proposed Development and Design Context

## Need for the Proposed Development

- 3.1 Located on the Severn Estuary, the Port of Newport is a major UK port, which is owned and operated by ABP. The Port is a vital transport hub, characterised by a highly-skilled, flexible workforce and modern cargo handling facilities. ABP continually works to improve and enhance the Port of Newport.
- 3.2 As section 2 of this document has highlighted, the Port of Newport benefits from excellent connectivity with direct road access to the A48 Southern Distributor Road and the M4, connecting Newport with key UK markets including London and the Midlands. Furthermore, the Port offers multimodal freight facilities with deep-sea access. The facilities at the South Dock include a minerals quay equipped with specialist grabbing cranes and a dust suppression system, drainage interceptor, fencing and an environmental bund wall.
- 3.3 The Port of Newport includes some currently vacant sites that are considered suitable for development. One of these sites is currently proposed for an energy centre and associated development, to be operated by Vo-Gen Energy Limited. The vacant site, which is the subject of this application, was the site of a previous application for a biomass power plant (planning application reference number: 08/1257) which was granted planning permission in January 2009 but never implemented.
- 3.4 In light of the context of the site and its surroundings, and given that there is strong demand for the provision of plasterboard in the UK, ABP and the prospective occupier have identified that there is the opportunity to develop the site for a new plasterboard manufacturing facility.
- 3.5 Plasterboard is a building material used to make interior walls and ceilings of buildings. It is made from processed gypsum pressed between two sheets of special paper. Plasterboard is used by the construction industry in buildings, including new houses, hospitals and schools. It is also used by consumers for 'DIY' home improvement and maintenance.
- 3.6 The Port of Newport's minerals quay facilitates the import and storage of gypsum, a mineral which comprises the primary raw material for plasterboard. As such, it is proposed that gypsum be delivered to the Port via sea, unloaded at the existing minerals quay, stored in the Port, and then delivered to the site as needed for the manufacture of plasterboard. Plasterboard products will then be distributed from the manufacturing facility via road transport, although distribution to domestic and export markets by sea would also be possible if this proved commercially viable.
- 3.7 The new manufacturing facility would contribute to meeting the need for plasterboard products in the UK from the construction industry, which would in turn support much-needed new building development across the country. It would also contribute to meeting demand from consumers for 'DIY' home improvement and maintenance.

- 3.8 Along with supporting the construction industry and consumer DIY, the manufacturing facility will generate approximately 70 full-time equivalent (FTE) direct jobs. It is estimated that the facility would also support an additional 130 indirect jobs in the supply chain. Through generating new employment, including manufacturing and office jobs, the proposed development will provide an important benefit to the local economy and contribute to NCC's objectives for economic growth and development, including Objective 3 of the Newport Local Plan (2015):

*'To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.'* (p. 10)

- 3.9 By making productive use of vacant land, providing direct high quality employment and supporting jobs in the supply chain, the proposed development will contribute to enhancing Newport's role as a major economic hub in the region.

- 3.10 As a use class 'B2' development within the Port of Newport, which is complementary to the operational use of the Port, the proposed development accords with Policy EM2 of the Newport Local Development Plan (NLDP) (2015). Policy EM2, the specific policy of relevance to the port, states that:

*'The existing 206 hectare employment site at Newport Docks is protected for B1, B2 and B8 uses. The Council will support such development where it can be demonstrated that the development is complementary to and does not hinder the operational use of the port.'*

- 3.11 As such, the proposed development is appropriately located on vacant employment land within the operational Port of Newport in accordance with the Newport Local Plan. It will make best use of the marine and road connectivity and facilities offered by the Port and the city of Newport. The facility will furthermore meet the need for plasterboard products in the building and consumer 'DIY' industries in the UK. Finally, the proposed development will generate and support high quality employment, contributing to the economic growth and development of Newport.

## Design Brief

- 3.12 The proposed manufacturing facility has been designed to meet the bespoke requirements of the prospective occupier, and the requirements of the owner of the site and operator of the Port of Newport, ABP. The key design issues that have shaped the design and layout of the proposed development, are that it should:

- utilise road and marine access to enable the efficient and sustainable movement of raw materials and finished products;
- facilitate and accommodate the plasterboard manufacturing process;
- provide a safe and efficient external layout and access that meets the needs of the end user as a business and its employees;
- provide a suitable, safe and inclusive internal layout;
- provide high quality welfare facilities and offices, and a landscaped area to provide amenity space for staff and visitors;



- provide a facility designed to allow for adaptations for future operations by another manufacturer if required, to ensure the future viability of the building;
- provide a site layout and building which takes into account and responds to the context of the site, including its location within the wider Port of Newport;
- be efficient and sustainable, including through reducing energy and resource use where practicable; and
- avoid or reduce impacts on habitats and species and provide enhancement where possible.

## Design Development

- 3.13 A collaborative design process has been followed from the outset of the project. A multi-disciplinary project team has worked in accordance with an agreed strategy that has established the roles, responsibility and design management procedures under the overall responsibility of ABP.
- 3.14 The design process has incorporated project meetings, engagement with stakeholders and pre-application consultation, and close liaison between the different disciplines.
- 3.15 The project team has worked closely with the proposed occupier to ensure that the design of the proposed development will meet the future needs of its plasterboard manufacturing business. This has included visits to its existing manufacturing facility in order to understand the bespoke requirements and potential impacts of the facility and in turn address these in the design of the proposed development.

## Planning Policy

- 3.16 In developing the design of the proposals, the project team has taken into account relevant policies—including those specifically relating to design and access—within the development plan and supplementary planning guidance, along with national planning policy and guidance including Planning Policy Wales (Edition 10, December 2018) (PPW10), The Wales Spatial Plan (2008), and Technical Advice Notes (TANs).
- 3.17 An assessment of planning policy, which sets out how the proposed development accords with local and national policy and guidance, is included as section 5 of this statement.

## Pre-Application Consultation and Engagement

- 3.18 The final design has been influenced by consultation and engagement, undertaken throughout the design development of the project and the preparation of the planning application and the EIA Screening process. This has included pre-application discussions with NCC and the statutory pre-application consultation process.

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**Pre-Application Planning Advice**

- 3.19 ABP also sought pre-application planning advice from NCC. A meeting between members of the project team and the case officer was held on 19<sup>th</sup> August 2019. NCC's written pre-application advice provided a preliminary officer assessment of the proposals. With regard to the principle of development, NCC's pre-application advice concluded that:

*'Policy EM2 supports the principle of complementary development within the Docks providing it does not hinder its operational use. It is therefore considered that the principle of development is acceptable.'*

- 3.20 NCC's pre-application advice further concluded that a planning application would:

*'need to demonstrate ... that there would be no harmful impacts on human health in respect of noise, contamination and air quality, no harmful visual impacts or harmful impacts on the local highway network; and it should be demonstrated that the consequences of flooding can be acceptably managed.'*

- 3.21 Furthermore, NCC's advice indicated that an application would need to demonstrate that impacts on ecology and ecological receptors would be acceptable, and that suitable enhancements can be secured.

- 3.22 The planning application, through this Planning and Design and Access Statement together with the submitted supporting assessments, documents and drawings listed under paragraphs 1.10 and 1.11, meet these requirements and demonstrate that the proposed development accords with relevant national and local planning policy as far as practicable. This includes the relevant policies within the Newport Local Development Plan highlighted in NCC's pre-application advice. A detailed appraisal of the proposed development against relevant planning policy is set out in section 5 of this document.

- 3.23 Engagement with other stakeholders, including Natural Resources Wales, NCC in its capacity as Lead Local Flood Authority (LLFA) and SuDS Approving Body, and Dwr Cymru Welsh Water, has also been undertaken.

**Statutory pre-application consultation**

- 3.24 Part 1a of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) (as amended) sets out the requirement to undertake pre-application consultation for planning applications for 'major development'.

- 3.25 In summary, prior to submitting an application for major development, the applicant must:

- publicise a draft of the planning application;
- consult community and specialist consultees;
- provide a 28 day consultation period; and
- report how the pre-application consultation was undertaken and how any responses were taken into account in a 'Pre-Application Consultation Report' submitted as part of the application.

- 3.26 'Major development' is defined under article 2 of the DMPWO. The proposed planning application area is 4.52ha, and includes the proposed plasterboard manufacturing facility building, which has a total floor space of approximately 15,140m<sup>2</sup>. As such, the application is for 'major development' as it is '*development carried out on a site having an area of 1 hectare or more*' and '*the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more*'.
- 3.27 In accordance with Part 1a of the DWMPO, pre-application consultation will therefore be undertaken over a 28-day period beginning on 28<sup>th</sup> January 2020. Responses will be collated and taken into account by the project team in the design of the development.

## 4 The Development Proposals

- 4.1 The proposed development has been designed to meet the requirements of the proposed occupier and ABP. The design has been informed by the context of the proposed development described in section 2 of this document, and the design context set out in section 3.
- 4.2 This section of the document sets out the development proposals and how the proposal has taken into account and responded to the five objectives of good design set out in Planning Policy Wales and TAN 12:
- Character;
  - Access;
  - Movement;
  - Environmental Sustainability; and
  - Community Safety.
- 4.3 In addition, this section provides a brief overview of the plasterboard manufacturing process, highlights key details relating to the operation of the proposed facility, and provides an overview of the process and programme for the construction of the proposed development.
- 4.4 The proposed development is shown on the site plan (drawing number **01001**). Figure 2 shows an illustrative 3D visualisation of the proposed development.

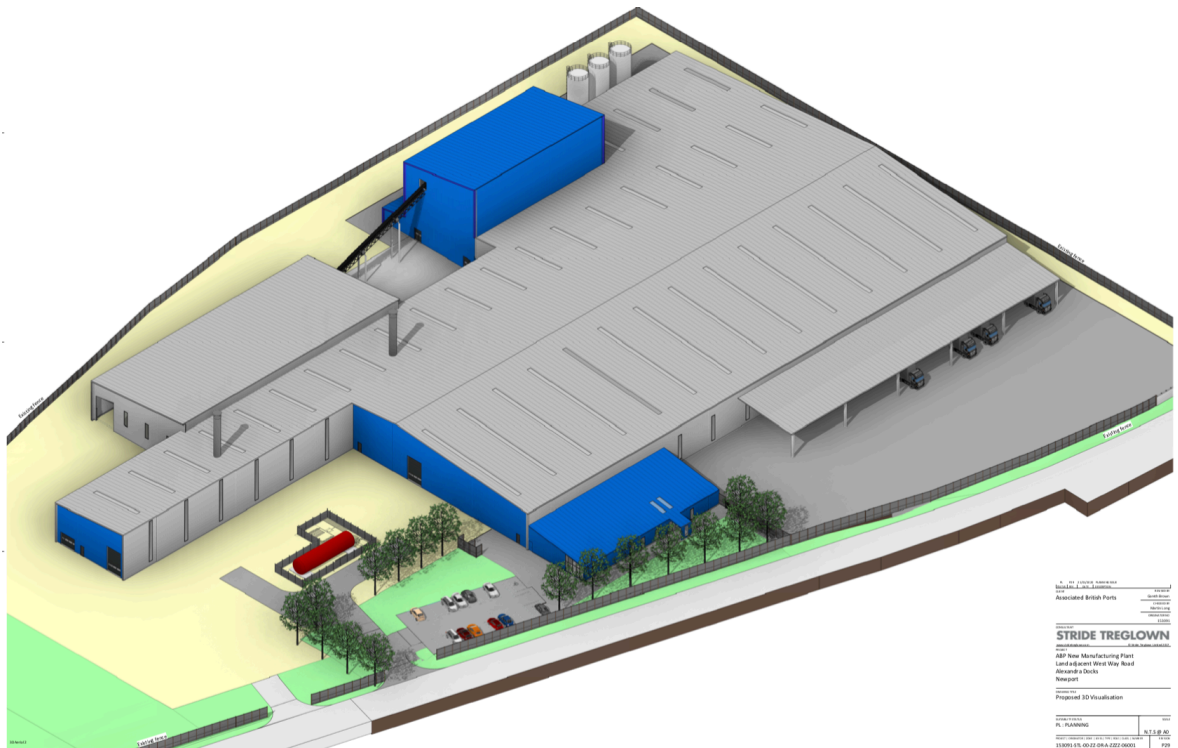


Figure 2: Proposed development 3D visualisation



#### 4.5 In summary the proposed development will comprise:

##### *Buildings and structures*

- plasterboard manufacturing facility main building;

##### *External areas*

- a car park with 22 spaces, including two accessible spaces;
- cycle parking comprising 30 long stay spaces and 15 short stay spaces;
- distribution yard;
- raw material processing area;
- landscaped area;
- habitat corridor;
- habitat enhancement area;

##### *Water storage*

- three external water tanks;
- underground storage tanks for re-use of surplus water from manufacturing process;

##### *Liquefied natural gas storage*

- one gas tank with associated plant and fencing;

##### *Waste storage*

- separate general waste and recycling bin stores;

##### *Surface and foul water drainage*

- package foul water treatment plant;
- surface water drainage network including full retention separator;
- outfall for surface water and treated foul effluent;

##### *Access and fencing*

- separate accesses into the site; and
- retention of existing fencing.

#### 4.6 The manufacturing facility will make an important contribution to the local economy by providing new jobs, including manufacturing and office jobs. It will generate approximately 70 full-time equivalent (FTE) direct jobs and it is estimated that the facility will support an additional 130 indirect jobs in the supply chain. The facility is expected to operate 24 hours/day over three shifts, year-round.

## Plasterboard Manufacturing Process

- 4.7 The production of plasterboard involves several phases. Gypsum is subject to a dehydration process known as calcination. This process removes 15% of the water of crystallisation (water that is present in crystalline compounds in definite proportions), allowing the gypsum to harden when mixed with water to form the plasterboard. Once heated, the gypsum is passed through a milling process to reduce grain sizes and is stored in silos.
- 4.8 The plasterboard itself is then formed between two sheets of special paper. Depending on the type of plasterboard being produced, different ratios of gypsum, water and additives are combined in a mixer. On a conveyor belt, this paste is then spread on a paper sheet. A superior sheet is applied on top, and the board is passed through a series of bending roll machines to ensure a consistent thickness and width. Once cut, the plasterboards are dried to remove excess water. Following a quality control check, the plasterboards are conditioned in pallets, labelled and stored ready for distribution.

## Operation

- 4.9 There will be a maximum of 35 staff on site at any one time. Operation of the facility is expected to be 24 hours per day over three shifts: 08:00 to 16:00, 16:00 to 00:00, 00:00 to 08:00.

## Design and Access Statement

### Character

#### *Placemaking*

- 4.10 The proposed development comprises a new plasterboard manufacturing facility within the Port of Newport, an area characterised by its operational use as a port. The context of the proposed development is described in detail in section 2 of this document. The manufacturing process involves the processing of gypsum to produce plasterboard to supply the construction and consumer DIY industries, as described in paragraphs 4.7 to 4.8 of this document.
- 4.11 The site is generally flat with minimal cross falls, however, due to the risk of extreme weather conditions and resultant flooding, the site levels will be raised to 9.63m above ordnance datum (AOD) to sit above the projected flood level. Further details relating to flood consequences are provided in the Flood Consequence Assessment (FCA) and SuDS Strategy, submitted alongside the planning application. A topographical survey of the existing site is provided as Appendix A to the FCA and SuDS Strategy document.

- 4.12 Due to the location and nature of the proposed development, it is considered that there is limited scope for placemaking. Nonetheless, the design of the proposal has sought to create a sense of place and contribute to the quality of life of staff and visitors through the provision of a landscaped area in the east of the site at the staff and visitor entrance of the proposed development, as shown on Figure 3. This landscaped space will include areas laid out as lawn, and tree and shrub planting to contribute to the sense of place and screen the operational areas of the site.

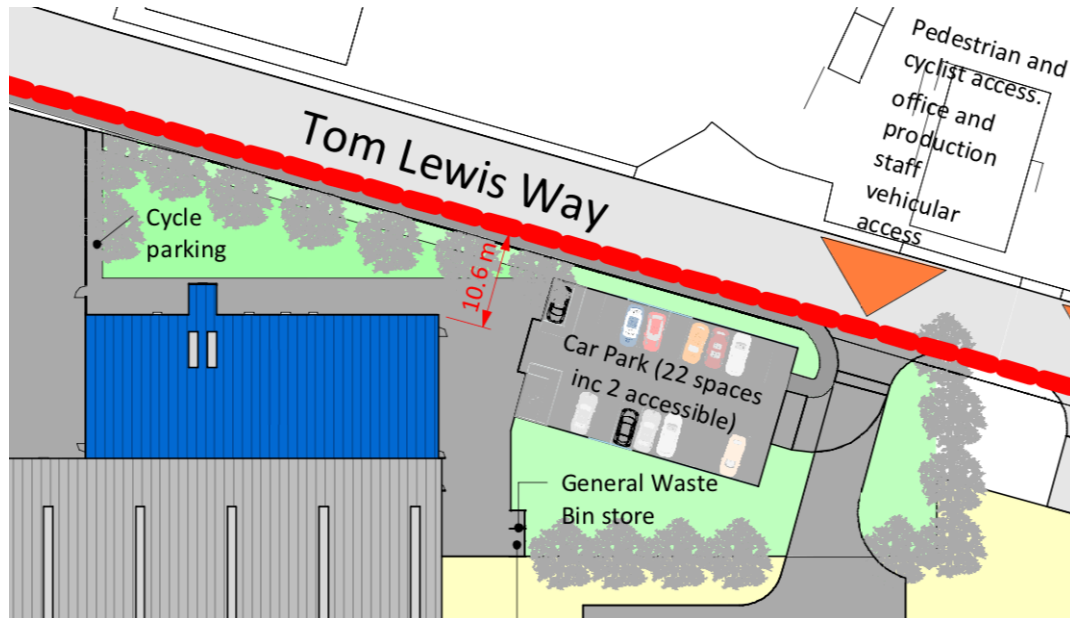


Figure 3: Extract from Site Plan showing landscaped area

- 4.13 As Figure 3 shows, the landscaped area will be adjacent to the offices/welfare facilities associated with the facility, and is likely to be the focal point of the development when staff/visitors are entering/leaving the facility and taking breaks.

### **Use and Tenure**

- 4.14 The proposed plasterboard manufacturing facility falls within use class B2 'general industry'. This proposed use is considered to be in keeping with the character of the Port of Newport, and would not conflict with the operational use of the Port. As such, and as assessed in detail in section 5 of this document, the proposed development will accord with policy EM2 of the Newport Local Development Plan (2011–16).
- 4.15 The development will make provision for all necessary services and facilities required to support the proposed use, including the supply of water and sewerage services. Paragraphs 4.53 to 4.64 of this section set out how the proposal supports sustainable travel where practicable, including use of public transport.
- 4.16 With regard to tenure, the site is owned by ABP and the facility will be leased to and operated by the plasterboard manufacturer.

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***Amount and Density***

- 4.17 The total site area is approximately 4.52 ha, as shown outlined in red on the location plan (drawing number **00002**) and site plan (drawing number **01001**). This includes an area of approximately 0.56ha for habitats to the south of the proposed manufacturing facility, and approximately 0.52ha of vegetation at the western boundary to be maintained for habitat connectivity. The area of the site to be developed for the proposed plasterboard manufacturing facility covers approximately 3.44 ha.
- 4.18 The proposed manufacturing facility main building has a total gross internal area of approximately 15,140m<sup>2</sup>, including a mezzanine floor and a covered raw material storage area. The proposed floor layout of the building is shown on drawings **01002** (ground floor) and **01003** (mezzanine floor).
- 4.19 The proposed main building will be predominantly single storey with a mezzanine floor. The mezzanine floor will have a gross internal area of approximately 200m<sup>2</sup> and is required to accommodate operations and plant associated with the calcination process (see paragraph 4.7 for a description of this process).
- 4.20 The proposed building has been sized to meet the operational requirements of the occupier and plasterboard manufacturing process, including the required space for equipment and plant, the production line, storage, and office and welfare facilities.
- 4.21 The proposed building size and amount of floor space is considered to be sustainable and suitable for the commercial operation of the site in the short and long term. Notwithstanding the intended immediate use, the facility has been designed to allow adaptation for future operations by another manufacturer to be accommodated within.
- 4.22 The density of the proposed development, in terms of the amount of floorspace proposed on a site of this scale, is considered appropriate for the location and its use class B2 'general industry' use.

***Scale***

- 4.23 The proposed main building will comprise a simple warehouse-style structure with a steel portal frame. The materials proposed are outlined under the Detailed Design heading which follows.
- 4.24 The plan form has been selected to be the most efficient for the operational needs of the plasterboard manufacturer.
- 4.25 The main building will have a maximum height to eaves of approximately 18m and a maximum ridge height of approximately 21m. The predominant eaves height will be approximately 9.2m and the predominant ridge height will be approximately 12.5m. The building will be approximately 202m long at its longest point and approximately 110m wide at its widest point.
- 4.26 The main building's scale is appropriate for its location and comparable with other facilities within the Port of Newport site, including the warehouse facility on the adjacent Speedy Hire. site to the north and other buildings within the Port. The ancillary structures are also considered to be of an appropriate scale for the location.

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**Layout**

- 4.27 The main building is oriented to achieve the most economical use of the site, whilst allowing for the space required by the manufacturer to efficiently operate the facility. The proposed layout of the main building has been set out following consultation with the occupier. The proposed orientation and layout of the development reflects and relates to its character and context, as a manufacturing facility within an operational port.
- 4.28 Offices and welfare facilities within the main building will be located adjacent to the access road, Tom Lewis Way, along with the distribution yard area. It is proposed that material processing and the calcination process takes place within the far west of the main building away from the offices and welfare facilities and access road.
- 4.29 The main building will be set back from the road by an adequate distance to allow articulated lorries to drive in and out of the site in forward gear, reducing noise from reversing alarms.
- 4.30 The proposed floor layout of the main building is shown on drawings **01002** (ground floor) and **01003** (mezzanine floor). The ground floor of the main building will incorporate the following:
- offices and welfare facilities;
  - loads and shipment area with four lorry loading docks;
  - manufacturing area with process equipment and production line;
  - maintenance workshop and store;
  - calcination process equipment and plant areas, and associated water tanks and pumps;
  - transformer room and switch room;
  - covered raw material storage area; and
  - additives store and laboratory.
- 4.31 The mezzanine floor of the main building will incorporate:
- production supervisor office;
  - calcination plant manager office;
  - calcination plant control panel; and
  - calcination plant operations room.
- 4.32 The external areas of the proposed development have been designed and located to create a functional and attractive site and to make the best use of the available space. The external areas will include the following:
- a car park with 22 spaces, including two accessible spaces;
  - cycle parking comprising 30 long stay spaces and 15 short stay spaces;

- distribution yard;
- raw material processing area;
- landscaping;
- three external water tanks;
- one gas tank with associated plant and fencing; and
- separate general waste and recycling bin stores.

4.33 The car parking, cycle parking and general waste and recycling bin stores will be located in close proximity to the offices and welfare facilities and the access road, to the east of the main building. The external water tanks will be located to the western rear of the main building near to the calcination process section of the building, and away from the main areas of staff activity. The gas tank will be located in the raw material and processing area in the south east of the site. The distribution yard is located in the north east of the site, with the loading docks located in the north east of the main building.

4.34 Three separate site access points are proposed, allowing for the safe separation of general distribution and deliveries, staff and visitor access, and raw material delivery. The raw material will be delivered as required from storage within the Port.

#### ***Detailed Design***

4.35 Materials have been selected to meet the needs of the occupier and ABP and reflect the character of the area. The main building will be constructed from a combination of standard, readily available materials as follows:

- grey insulated built-up cladding;
- grey single skin profiled metal cladding;
- blue insulated built-up cladding;
- concrete upstand;
- double glazed PPC aluminium windows;
- translucent roof lights/windows as part of the cladding system;
- roller shutter doors; and
- dark grey steel personnel doors in building external wall.

4.36 Materials in external areas will include the following:

- heavy duty tarmac for vehicle and pedestrian/cyclist access, external ground areas in the distribution yard, staff and visitor entrance area and car park, and around part of the main building;
- broom finish concrete for bulk raw material access and concrete slab for area south of the calcination tower;

- grassed areas and planting in the staff and visitor entrance area; and
- compacted gravel in the raw material processing area in the south/south-west of the site and along the western and northern boundaries.

4.37 Proposed materials are shown on drawings **01001**, and **02001**. The proposed materials are considered to be appropriate and in keeping with the character of the area as an operational port.

4.38 With regard to boundary treatment, the existing fencing around the site will be retained, as shown on drawing **01001**. The gas tank will be enclosed by a chain link fence as shown on drawing **02001**.

### ***Heritage***

4.39 The proposed development has been designed to meet the requirements of the proposed occupier and ABP, and to be in keeping with the character of the operational Port of Newport.

4.40 An assessment of the potential heritage impacts of the proposed development is set out in the Heritage Impact Statement submitted alongside the planning application.

4.41 The site is outside of, and is not considered to harm the significance of, the Gwent Levels Historic Landscape of Outstanding Historic Interest. As indicated by the Heritage Impact Statement, measures have been incorporated into the design of the proposed development in order to avoid harm on the Historic Landscape area. These design measures are as follows:

- Layout – the proposed development is aligned to follow the line of the existing industrial units to the north of the site.
- Building design – the massing and scale of the building will be in proportion with existing industrial development within the docks area. The scale, variations in ridge heights and fragmentation of the external elevations (recessed sections, advanced sections) will help to break up the expanse of the elevation.
- Landscaping – the strip of vegetation (trees) beyond the western boundary of the site will be retained.

4.42 As agreed with NCC as part of the pre-application advice process, an assessment of the Significance of Development on Historic Landscape is not required to support the planning application, due to the scale and location of the proposed development.

### **Access**

#### ***Access to the Development***

4.43 The site is accessed by road from Tom Lewis Way, via West Way Road within the Port of Newport. West Way Road is accessed from Docks Road, which connects to the A48 as it runs through Newport. The A48 connects to the M4 at Junction 28 to the west and Junction 24 to the east, providing access to the national motorway network.

- 4.44 A barrier and security kiosk are located at the entrance to the Port on West Way Road, maintaining secure access to the Port.
- 4.45 Access to the development will be split between three separate accesses for safety and operational reasons, and to ensure ease of access for all users of the site.
- 4.46 The northern-most access will primarily be for outbound material, the access towards the centre of the site is predominantly for staff and visitors travelling by foot and bicycle, and by car, and the southern access will be for the inbound raw bulk material. The access points will separate bulk raw material HGV movements from cars, and from pedestrians and cyclists. The central staff and visitor access has a separate pedestrian and cycle path. When required, liquid natural gas (LNG) will be delivered by tanker using the central access. The accesses to the site are shown in Figure 4.

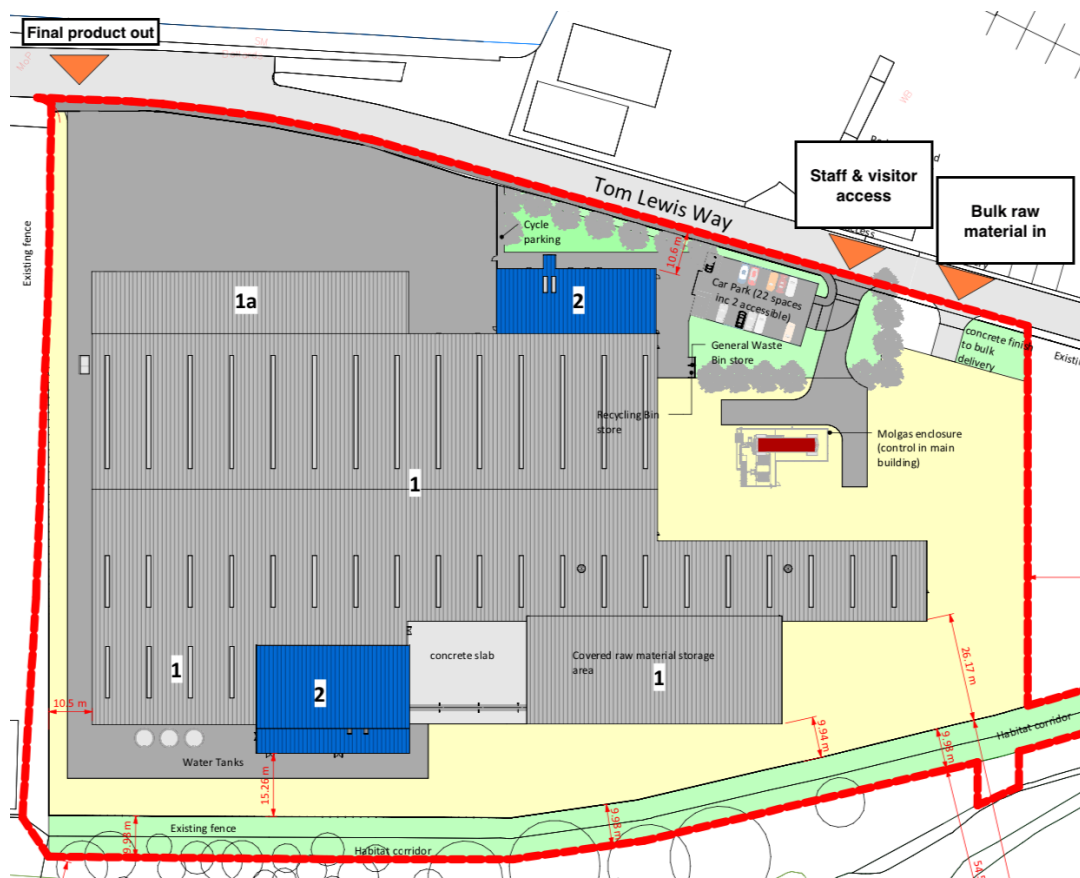


Figure 4: Extract from Site Plan showing access arrangements

- 4.47 Although the site is being raised from 7.60–9.00m AOD to 9.63m AOD, it will be level across its width and length. Access to the site will be facilitated by ramps/slopes at the entrances.
- 4.48 Proposed access arrangements to the proposed development are shown on drawing **01001**.

#### **Access Within the Development**

- 4.49 As set out previously, the three separate accesses to the site ensure ease of access for all users. This also facilitates safe and efficient access within the site, as bulk raw material HGV movements will be separated from staff and visitors travelling by car, foot and bicycle. Emergency vehicles will be able to use any of the vehicular site accesses in order to access the part of the site needed safely and efficiently.



- 4.50 Accesses into the main building are proposed via level threshold (to ensure ease of accessibility into the facility for all), with all the office and visitor accommodation on the ground floor. The main building will predominantly be on one level, but some areas associated with production control and the calcination process are set on a mezzanine level. The mezzanine level will be accessed via a steel staircase.

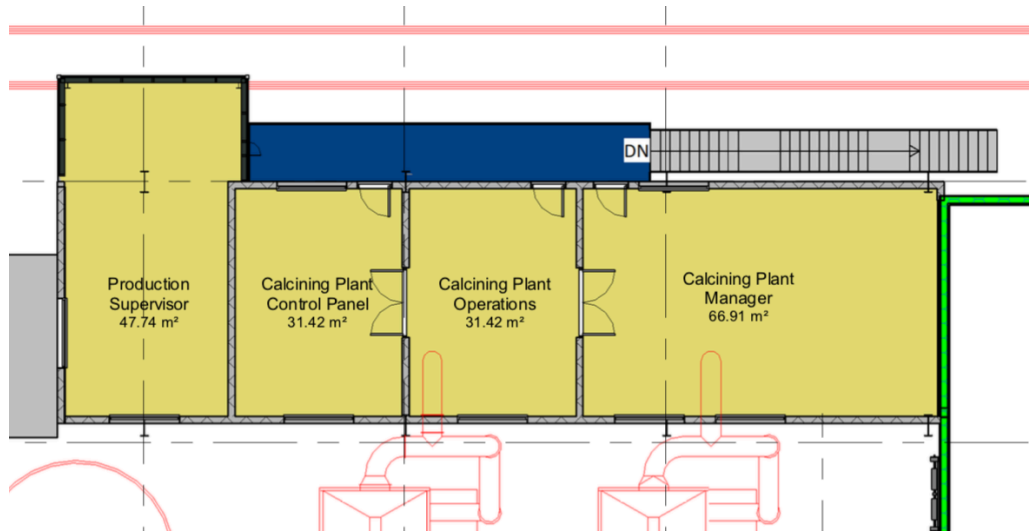


Figure 5: Extract from floor plan showing mezzanine level

- 4.51 These arrangements are proposed to ensure efficient and safe access within the development for all users, including pedestrians and users with accessibility requirements, cyclists, and emergency vehicles. Drawing **01001** shows the access arrangements within the proposed development, including proposed entrances to the main building.
- 4.52 Car and cycle parking arrangements are covered in the 'Movement' section of this document which follows.

## Movement

### Car and Cycle Parking

- 4.53 The proposed development includes a car park in the east of the site and in close proximity to the office and welfare facilities. The car park will provide 22 spaces, inclusive of two accessible spaces, for staff and visitors based on the occupier's requirements. It is proposed that the two assessable spaces be located closest to the office and welfare facilities. There will be a maximum of 35 staff on site at any one time.
- 4.54 There will be four loading docks in the north-east of the site, providing operational parking for lorries.
- 4.55 The Transport Assessment submitted as part of the planning application indicates that application of the NCC parking standards would require the provision of 140 operational spaces and 100 non-operational spaces. This is considered unnecessary and excessive, given the small maximum number of people who will be on site at any one time. It should be noted that this application is for a development for a particular occupier and a particular use, rather than being for general speculative development.

- 4.56 Furthermore, it is proposed that 30 long-stay and 15 short-stay bicycle parking spaces are provided for staff and visitors. Application of the NCC cycle parking standards requires 28 long stay spaces and 14 short term spaces. The proposed development is therefore in excess of the proposed cycle parking standards. This supports the lower car parking provision and supports sustainable travel to/from the site.
- 4.57 Car parking and cycle parking will be located in visible areas in the east of the development site, to allow for informal surveillance.
- 4.58 Car and cycle parking are shown on the site plan (drawing **01001**) and ground floor plan (drawing **01002**).

### ***Goods Transport and Deliveries***

- 4.59 Transport of finished goods manufactured at the facility will be from the northern-most site access. Deliveries to the site will enter the facility through one of the three access points, as follows:
- Bulk raw material to be processed in the facility will use the southern-most access leading to the raw material processing area;
  - Office deliveries, along with LNG deliveries when required, will use the central access point leading to the staff car park and office and welfare facilities; and
  - Other materials used in the manufacturing process will use the northern-most entrance to the distribution yard and deliver to various points on the building's perimeter, predominantly to the rear of the building.

### ***Public Transport Accessibility***

- 4.60 The nearest public transport connection is located on Docks Way, which is serviced by the no. 35 bus. The no. 35 operates between 06:00 and 20:00, Monday to Friday, 07:00 to 22:00 on Saturdays, and 10:00 and 18:00 on Sundays.
- 4.61 Newport Train Station is approximately 3 miles north. Newport Station is served by Cross Country trains and Great Western Railway. Newport Station provides train services to destinations across the UK including Taunton, Cardiff, Manchester, London Paddington and Bristol.

### ***Pedestrian and Cycle Accessibility***

- 4.62 There are limited pedestrian and cyclist facilities when accessing the site within the Port of Newport itself. Access from Docks Way, via West Way Road, to the site is approximately 1.5 miles in length. There are footpaths provided for some of this route.
- 4.63 National Cycle Network (NCN) Route 4 is however in close proximity of the site. This provides an off-road footway/cycleway along the A48 Southern Distributor Road. Route 4 provides access to Route 47 which connects to Newport City Centre. Figure 3.2 of the Transport Assessment shows the local cycle network in proximity to the site.

- 4.64 Figure 3.3 and Appendix A of the Transport Assessment shows the cycle catchment of the site. This highlights that a considerable area of Newport, including residential areas and the railway station are accessible by cycle to the proposed development.

## Environmental Sustainability

### *Landscape and Ecology*

- 4.65 An Ecological Impact Assessment has been submitted with the application which identifies measures to protect fauna species from harm; and disturbance and habitat creation measures to mitigate the significant adverse effects of the proposed development on ecological receptors.
- 4.66 In summary, the proposals comprise:
- a Habitat Enhancement Area (HEA) to be managed to retain and enhance Open Mosaic Habitat (OMH); and,
  - a Habitat Corridor (dense shrub belt).
- 4.67 Implementation of these proposals will be via Ecological Management Plans (EMP) which will cover a 20-year period for the proposed HEA. The EMP for the Habitat Corridor and HEA within the southern part of the application site accompanies the planning application.
- 4.68 The HEA will comprise approximately 0.56ha of land, at the confluence of the River Ebbw and the Severn Estuary. The enhancements of OMH will include favourable landscaping using species native to the UK and of local provenance, maintenance of flower rich areas for invertebrates, maintenance of suitable foraging habitat for common reptiles, birds and bats. The proposed enhancements and maintenance specifications will provide compensation for the direct loss of open mosaic priority habitat as a result of the proposed development.

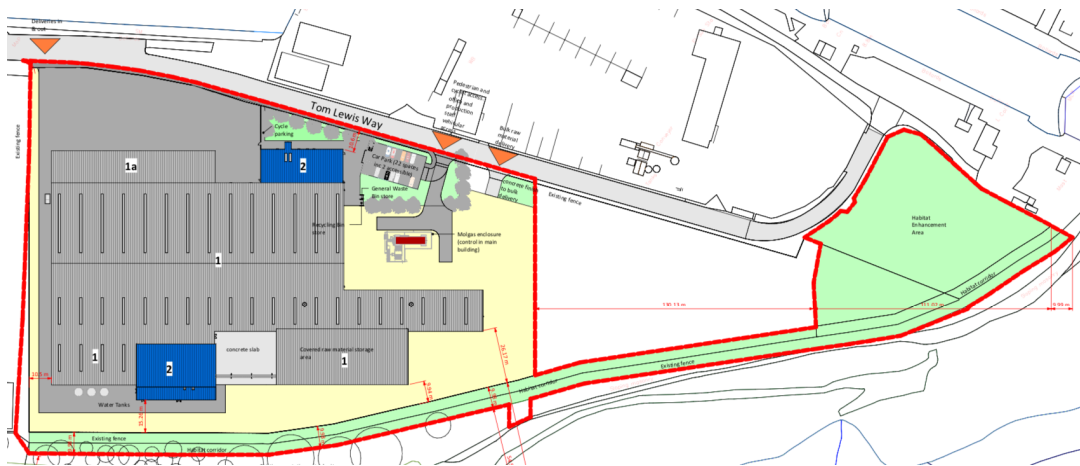


Figure 6: Extract from Site Plan showing habitat enhancement to the south and habitat corridor

- 4.69 The proposed habitat corridor is a 10m wide strip of vegetation, which mainly comprises dense shrub and trees, which will be retained and enhanced between the western boundary of the site and the Ebbw River. This habitat corridor will retain bird nesting habitat, create a natural wildlife buffer to the site and will serve to reduce the extent of overall habitat loss. It will ensure connectivity with habitats on and off site, as well as provide further screening of on-site operations. The proposal includes two bird boxes and two bat pole mounted rocket bat boxes.
- 4.70 The proposed habitat enhancement area to the south and habitat corridor is shown on Figure 6 and the site plan (drawing **01001**).
- 4.71 In respect of landscaping proposals, the application is accompanied by an Illustrative Green Infrastructure Plan and detailed planting proposals. In addition to the habitat areas set out above, a new belt of structural landscape planting along the north western boundary to connect into the habitat corridor is proposed. An area in the east of the site at the staff and visitor entrance of the proposed development, where the office/welfare facilities and parking areas are to be located, will also be landscaped with a number of trees of shrubs along with areas of grass to provide an amenity area and to contribute to the sense of place and screen the operational areas of the site.

#### *Off-site mitigation*

- 4.72 ABP is also offering a further 1.13ha of land within Newport Docks, off West Way Road to the north east of the site to be managed as an additional off-site Habitat Enhancement Area (AHEA). The area is shown on drawing no. CA11637-008 (EcIA – page 349). The area comprises mainly dense scrub and bramble and a small area of swamp.
- 4.73 It is proposed to manage land within the AHEA to improve the structural and species diversity of ephemeral/short perennial vegetation. This would increase the area of ESP/SS habitat at Newport Docks and benefit a wider range of invertebrates. The area of swamp vegetation will also be retained and managed to diversify the habitats available in the long term for invertebrates. A separate EMP will be prepared for the off-site AHEA and if required by NCC, secured by condition.

#### ***Energy and Resource Efficiency***

- 4.74 The main building has been designed with a fabric-first approach to energy and resource efficiency. Appropriate metering and controls will enable effective energy monitoring and management of the development when operational.
- 4.75 The building has been designed for durability and resilience. All vulnerable parts of the building will be protected in order to reduce damage to the building's fabric and materials. Exposed parts of the building will also be protected from material degradation from environmental factors. The design, therefore, seeks to reduce the need for repairs to the building and replacement materials and parts, and the associated energy and resources embodied and associated with this.

- 4.76 Where possible, materials used in the development will be sourced from the local market in order to minimise embodied carbon and transport miles associated with the proposals. Every effort will be made to responsibly source all materials. A sustainable procurement plan, setting out a clear framework for the responsible sourcing of materials to guide procurement throughout the project will be prepared.
- 4.77 The proposals will utilise green renewable energy made available via two wind turbines and solar PV array within the Port.
- 4.78 Natural gas is required as part of the calcination process to heat and dehydrate the gypsum, and as part of the production process to heat and dry the plasterboard. The CO<sub>2</sub> emissions associated with the use of natural gas contribute to climate change. However, natural gas produces less CO<sub>2</sub> per unit of energy compared with other fossil fuels. Furthermore, recycled material will be used in the production process wherever possible, which will help reduce greenhouse gas emissions from the proposed development.
- 4.79 It is estimated that the proposed development will contribute 16.5 kt CO<sub>2</sub> per year to the atmosphere. This is based on an estimated natural gas usage of 90,000,000 kilowatt hours (kWh) per year, and a conversion factor for natural gas of 0.18351 kg CO<sub>2</sub> per kWh<sup>3</sup>.
- 4.80 Two wind turbines and a large roof-based solar PV array are located on the port estate. These assets supply green renewable energy to port activities and those of its tenants. The port generates more power than is used by ABP making it notionally self-sufficient with renewable energy over the period of a year. The port continues to evaluate opportunities for further renewable energy projects.

### ***Emissions***

- 4.81 As outlined previously in this section, the production of plasterboard involves a process known as calcination. This will take place in the calcination tower area within the western part of the main building and will involve the use of natural gas to heat and dehydrate the gypsum. The emissions from this process are water vapour and those emissions associated with the use of natural gas, mainly carbon dioxide (CO<sub>2</sub>). Two flues will be located at a high level in the calcination tower in order to discharge emissions, as shown on drawings **01004** (roof plan) and **02001** (proposed main building elevations).
- 4.82 There will also be two flues through the roof of the manufacturing facility, located where the plasterboard is dried and finished. Emissions from these flues will be from the use of natural gas in the heating process. These flues are shown on drawings **01004** (roof plan) **02001** (proposed main building elevations).
- 4.83 The proposals may require an Environmental Permit and if so, this will be obtained by the occupier prior to the operations commencing.

### ***Water Management***

- 4.84 The manufacturing process to be carried out at the proposed facility is water intensive, requiring in the region 15,000 litres of water per hour. Welsh Water is aware of this requirement and this will be further discussed on the scheme's approval.
- 4.85 Surplus water used during manufacture will be collected in underground tanks, cleaned and recycled back into the manufacturing process.

- 4.86 Separate to the planning application, a SuDS application has been prepared and submitted to NCC in its role as SuDS Approving Body (SAB). The application demonstrates compliance with the Statutory SuDS Standards for the design, construction, operation and maintenance of surface water systems serving new developments.

### ***Waste Management***

- 4.87 Design features will be incorporated within the proposed development to facilitate increased recycling performance overall. This includes providing sufficient storage for recyclable materials generated in plasterboard production, alongside the recycling of plasterboard as process feedstock and the reprocessing of reject produce.
- 4.88 Separate general waste and recycling waste bin stores will be located in the east of the site in close proximity to the offices and welfare facilities. These will cover standard domestic-type waste and recycling products.
- 4.89 It is proposed that the occupier will enter into an agreement with either the local authority or a registered disposal company to collect and dispose of the waste. Waste collection vehicles will access and egress the site via the staff and visitor vehicular entrance.
- 4.90 Recycling provision will be made available for site visitors and office / welfare use, where appropriate. Consideration will also be given to more innovative schemes to encourage recycling by staff members. However, adoption of these will be dependent upon the specific waste management options employed by Newport Council or local waste and recycling collection contractors.
- 4.91 Liaison with the other local businesses will identify opportunities for partnering on waste and resource management (e.g. if a waste material from the site is able to be utilised as a resource by a neighbouring site replacing an otherwise separately procured raw material). These links will be investigated and pursued (as appropriate) and discussed and agreed with the local authorities where it affects waste collections and/or generates environmental benefits.
- 4.92 Further details can be found within the Site Waste and Natural Materials Management Plan (SWNMMP) submitted as part of the planning application. The SWNMMP sets out details of the materials anticipated to be used and waste produced during the construction and operation of the facility, and how these will be sustainably managed.

### ***Foul Sewerage***

- 4.93 No public foul sewers are present within the docks and therefore the proposed point of discharge is the River Ebbw via a package treatment plant.
- 4.94 The process for manufacturing is a closed system and does not produce effluent which would run through the foul system. Therefore, the only effluent being processed will be domestic equivalent and suitable for a standard package treatment plant.
- 4.95 The outfall from the treatment plant would be shared with the surface water outfall from the site as shown on the drainage strategy drawing (drawing **92000**), which is included as Appendix D of the Flood Consequence Assessment and Sustainable Drainage Strategy submitted as part of this planning application.

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## Community Safety

### *Security and Natural Surveillance*

- 4.96 The facility is within the secure Port of Newport, with access to the Port controlled by barriers and security kiosks at the entrance/exit. The development will therefore benefit from the formal security arrangements provided at the Port. The proposed development will fall under the existing safety and security procedures and requirements operated across the Port of Newport.
- 4.97 Furthermore, natural surveillance will be achieved from staff working on site and through other port users utilising Tom Lewis Way and adjacent areas of the Port. The facility is expected to operate 24 hours/day, with appropriate lighting as described in the following paragraphs, facilitating some degree of natural surveillance at all hours.
- 4.98 Car parking and cycle parking has been located in visible areas in the east of the development site, to allow for informal surveillance.
- 4.99 Whilst a Secured by Design application is not currently being sought for the development, the principles of Secured by Design have been taken into account in its design.

### *Lighting*

- 4.100 As the facility is expected to operate 24 hours/day year-round, lighting will be an important feature of the development.
- 4.101 External lighting will be designed in accordance with the relevant standards (BS5489-1: 2013 (Lighting of Roads and Public Amenity Areas) and BS EN 12464-2: 2014 (Light and Lighting: Lighting of Workplaces - Part 2: Outdoor Work Places).
- 4.102 The lighting will be designed to avoid impacts of light pollution on wildlife and not be above the background level of the Port of Newport. All lighting used during construction and operation will be of a minimal height and have minimal light spill. Lighting will be directed away from the western and southern boundaries, will be timed where possible, and use light unattractive to invertebrates. In respect of mitigating any impact on bats, the following specific measure will be undertaken:
- Operational lighting will have a reduced spill ideally below 70° where possible to create a large volume of darker space at height in areas where night time lighting is required to stay on;
  - Lighting will be directional as aided by hoods to concentrate the beam, and this will apply whether permanently on during the night or movement-sensor controlled;
  - Light spill towards natural vegetation will be avoided, particularly towards the 10 m buffer strip of vegetation along the western boundary of the site; and
  - Bulbs will be used that emit low levels of ultraviolet light and peak higher than 550 nm, particularly where lighting will stay on permanently throughout the night, therefore limiting attraction to invertebrates.



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**Wayfinding**

- 4.103 The area in the east of the site, where the office and welfare facilities and parking are located, is designed to facilitate simple and legible navigation for all staff and visitors. Wayfinding in the distribution yard and raw material processing area will be determined by the requirement for safe access routes, given that these will be working areas. Similarly, internal wayfinding will be determined by the need for safe access routes throughout the building given the heavy machinery being operated in the facility.

**Public and Private Space**

- 4.104 The proposed development is situated in the Port of Newport, which is private land owned and operated by ABP. Access roads to the proposed development are private, with access and egress controlled by barriers and security kiosks at the entrance to the Port.
- 4.105 The site will be maintained by ABP or the occupier in accordance with their commercial arrangements.

**Construction**

- 4.106 A Construction Environmental Management Plan (CEMP) is submitted as part of the planning application. The CEMP describes how construction activities shall be undertaken and managed in accordance with legislative requirements and construction industry best practice.
- 4.107 The CEMP sets out a range of measures to mitigate against potential impacts on the environment from construction of the proposed development. It establishes the contract-specific information with which all contractors should comply.
- 4.108 A Site Waste and Natural Materials Management Plan (SWNMMP) has also been produced and is submitted as part of the planning application. The SWNMMP includes details of the materials anticipated to be used and waste produced during the construction and operation of the facility, and how these will be sustainably managed.

**Construction activities and sequencing**

- 4.109 A principal contractor has not yet been appointed and therefore it is not possible at this time to set out the full details of the proposed construction programme, individual activities and associated methodology/sequencing of work. However, a summary of the envisaged key construction activities and sequencing of work is as follows:
- Formation of contractor's site set up;
  - Site clearance and removal of existing vegetation and site obstructions;
  - Raising of site levels utilising suitable imported engineered fill to achieve flood mitigation requirements;
  - Ground engineering works to mitigate differential settlement;
  - Piled foundations and associated substructure works;
  - Reinforced ground floor concrete slab / piled floor slab;



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- Structural steelwork superstructure;
  - Installation of main building;
  - Formation of onsite road access and tie-in with existing port road infrastructure;
  - Concrete slab to external raw material storage area, with associated surface water drainage;
  - Provision of car parking area;
  - Soft landscaping;
  - Provision of off-site incoming main services to the site including water, electricity and telecoms/data; and
  - Provision of foul drainage to package treatment plant.

***Construction working hours***

- 4.110 Normal working construction hours are proposed to be between 0730-1800 hours Monday to Friday inclusive.

## 5 Planning Policy Appraisal

- 5.1 This section demonstrates that the proposed development complies with national policy and is in accordance with the Statutory Development Plan. It considers the principle of the development and identifies and assesses relevant planning and environmental issues.
- 5.2 The Planning and Compulsory Purchase Act (2004), Section 38(6) sets out the need for planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 5.3 The Development Plan, together with Government policy on sustainable development, Planning Policy Wales (Edition 10, December 2018), The Wales Spatial Plan (2008), Government guidance through Technical Advice Notes (TANs) and other statutory and non-statutory guidance documents have been analysed in relation to the proposal.

### The Statutory Development Plan

- 5.4 The statutory Development Plan for Newport against which the planning application has to be considered, comprises;
- Newport Local Development Plan 2011-2026 (January 2015) (NLDP).
- 5.5 Figure 1 shows environmental constraints and Figure 7 shows relevant spatial planning constraints from the NLDP Proposals Map – West (January 2015), and how these relate to the application site.
- 5.6 Supplementary Planning Documents (SPDs) do not form part of the statutory development plan, but support policies within it, and are therefore a material consideration in decision making. The following are considered relevant to the proposal:
- Air Quality Supplementary Planning Guidance (February 2018);
  - Archaeology and Archaeologically Sensitive Areas Supplementary Planning Guidance (August 2015);
  - Parking Standard Supplementary Planning Guidance (August 2015);
  - Planning Obligations Supplementary Planning Guidance (August 2015);
  - Trees, Woodland, Hedgerows and Development Sites Supplementary Planning Guidance (January 2017);
  - Wildlife and Development Supplementary Planning Guidance (August 2015);
  - Draft Planning Obligations Supplementary Planning Guidance (June 2019); and
  - Draft Waste Storage and Collection Supplementary Planning Guidance (April 2019).

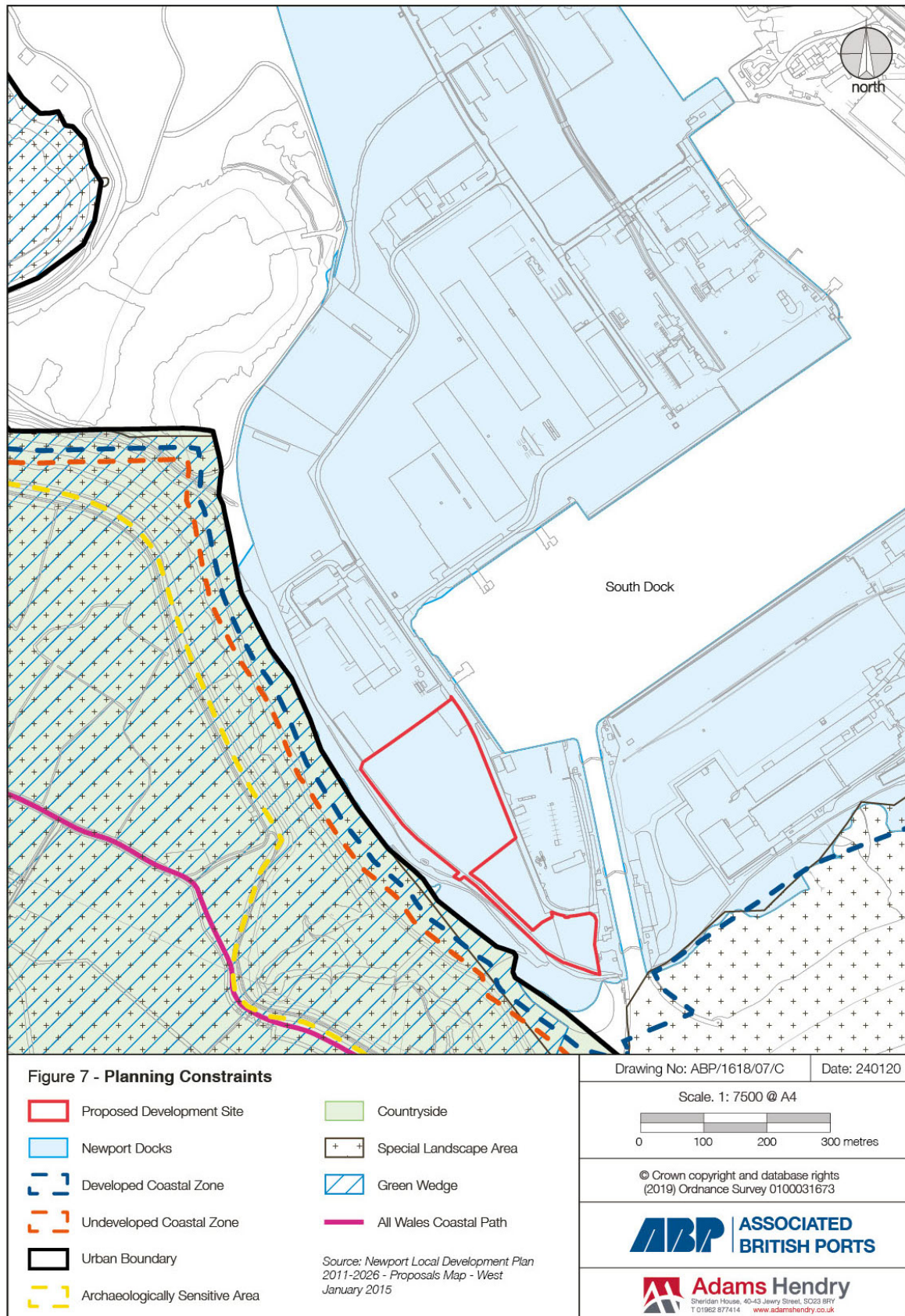


Figure 7: Planning constraints

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**Planning Policy Wales (Edition 10, December 2018)**

- 5.7 Published in December 2018, Edition 10 of Planning Policy Wales (“PPW10”) establishes the national planning policy framework for guiding development throughout Wales.
- 5.8 PPW10 is closely aligned with the Well-being of Future Generations (Wales) Act 2015 (WFGA) and supports sustainable forms of development in the context of ‘the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals’.
- 5.9 In the context of the WFGA, PPW10 sets out that Local Planning Authorities should ensure that ‘social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working. This is to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle’ (paragraph 2.21).
- 5.10 PPW10 acknowledges that it may not always be possible for development proposals to benefit all aspects of sustainable development equally. In such cases, the document states that strong evidence should be presented in support of these decisions.
- 5.11 Section 6 of this Planning and Design and Access Statement includes consideration of sustainable development and the WFGA and sets out a balanced appraisal as to how the plasterboard proposals for Newport Docks would contribute to economic, social, cultural and environmental well-being by virtue of its design and development, taking into account PPW10.
- 5.12 The Welsh Government has prepared a number of Technical Advice Notes (TANs) which provide additional planning guidance and which are a material consideration in any planning decision. The following are considered relevant to the proposal:
- TAN5 (2009): Nature Conservation and Planning
  - TAN8 (2005): Renewable Energy
  - TAN10 (1997): Tree Preservation Orders
  - TAN11 (1997): Noise
  - TAN12 (2016): Design
  - TAN14 (1998): Coastal Planning
  - TAN15 (2004): Development and Flood Risk
  - TAN18 (2007): Transport
  - TAN21 (2004): Waste
  - TAN23 (2014): Economic Development
  - TAN24 (2017): The Historic Environment



## Principle of Development

- 5.13 Newport Docks is recognised as an International Gateway to Wales. It offers appropriate, high quality infrastructure and supports numerous port businesses and other related B1, B2 and B8 businesses in a safe and accessible industrial environment. Facilitating the dock's growth provides wide economic benefits both locally and nationally.
- 5.14 PPW10 states how ports make Wales an attractive location for business, visitors and freight transportation. Within national policy there is a commitment to supporting and enhancing port infrastructure. PPW10 states that: *'planning authorities should seek to promote the use of ports, harbours, marinas and inland waterways by the protection or provision of access to them and by the retention or provision of appropriate wharf, dock, harbour and rail transfer facilities to support economic activities in a way that minimises any adverse impacts on the environment. Planning authorities should also consider and, where appropriate, promote ports, and their surrounding area, for inter-modal freight interchanges and strategic employment sites'* (paragraph 5.3.16).
- 5.15 Within the NLDP, the Port of Newport is identified as 'Newport Docks' the subject of employment policy EM2. Policy EM2 specifically relates to Newport Docks, where 206 ha are allocated for employment use. It states that *'the Council will support development where it can be demonstrated that the development is complementary and does not hinder the operational use of the Port.'* Supporting text in the NLDP indicates that there is a *'surplus of land within Newport Docks which could better meet Newport's economic development objectives if brought into alternative, productive, employment uses within Use Class B1, B2 or B8.'* A plasterboard manufacturing facility is a B2 use class.
- 5.16 From an analysis of the policy and supporting text, it is clear that this policy seeks to encourage further employment development within the Port but on the basis that the development taking place is complementary to and does not hinder the operation of the Port.
- 5.17 The Port of Newport's existing minerals quay is able to import and store gypsum. Gypsum will be delivered to the Port largely via sea, unloaded at the minerals quay, stored in the Port, and then delivered to the site as needed for the manufacture of plasterboard. Gypsum is of very low value and it is not economic to transport by road ahead of processing and manufacturing. Commercial viability of the proposed plasterboard manufacturing facility is dependent on its location within the docks, as the transportation of gypsum (and associated cost) is reduced. The processing of gypsum within a port location is therefore necessary in economic sustainability terms and complementary to other port related activities.
- 5.18 The proposals are therefore supported by and are in accordance with Policy EM2 of the NLDP, benefiting from a port location, complementing the operational use of the port and providing port related employment.
- 5.19 As set out in section 1.10 of PPW10 it is also necessary to demonstrate that a proposed development is sustainable (i.e. contributes to social, economic and cultural well-being). The proposed development has been considered against the well-being objectives set out by the Welsh Government, Newport City Council and Natural Resources Wales. A sustainable development appraisal is included in Section 6 of the Planning and Design and Access Statement to assist Newport City Council in their decision-making and their responsibilities under the Well-being and Future Generations Act. The appraisal demonstrates how the proposed development meets sustainability objectives.

- 5.20 A further key component of PPW10 is that the ‘right development should be in the right place’ and development proposals should seek to deliver the national sustainable outcomes (Figures 3 and Figure 4). The proposed development meets these in a number of ways including:
- Creating and sustaining communities – the creation of jobs, a number of which are in the manufacturing sector;
  - Making best uses of resources – unlocks the potential of vacant land within an operational strategic port;
  - Maximising environmental protection and limiting environmental impact – the development has been carefully assessed and designed to limit its environmental impact, offering appropriate mitigation and safeguarding where necessary;
  - Growing our economy in a sustainable manner – the development fosters economic activity, creating both direct and indirect employment;
  - Facilitating accessible and healthy environments – the proposed site offers connectivity to the port, facilitating the shipping of gypsum to its point of processing.
- 5.21 In determining where development should be located, PPW10 prioritises the use of previously developed land and/or underutilised sites (section 3.39). This is also reflected in Objective 1 and Policy SP1 of the NLDP where proposals are expected to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within settlement boundary. Policy SP18 further supports development which assists the regeneration of the urban area, in particular the reuse of vacant, underused or derelict land. Whilst the site does not represent previously developed land as specifically defined in PPW10, it is part of ABP’s operational land holdings within Newport Docks, has been used for various port related uses over a number of years and allocated as an employment site in the NLDP (policy EM2). In accordance with Policy SP1 of the NLDP, it represents an efficient use of land.
- 5.22 The NLDP contains a further series of policies setting out general development principle policies applicable to development proposals – Policies GP1–GP7. These consider the suitability of the site in the context of its neighbours, its surrounding environment, quality of design and accessibility. The proposal’s compliance with these policies is set out in the remainder of Section 5.
- 5.23 Overall, the proposed location of the plasterboard manufacturing facility is ideal and sustainable, being both accessible for the import of gypsum and utilising vacant land within an operational dock. The facility will make an important contribution to the continued economic sustainability of both Newport Docks and Newport as a whole.

## Employment

- 5.24 PPW10 says that, “*Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration*” (section 5.4.4). Furthermore, a key planning principle of PPW10 is that planning should enable development which contributes to long-term economic well-being.
- 5.25 Objective 3 of the NLDP is to, “*enable a diverse economy that meets the needs of the people*”

*of Newport and those of the wider South East Wales economic region".* Commentary on Newport's economic context in section 6.2 of the NLDP, notes an economy undergoing significant structural change, with a decline in manufacturing employment. As set out above, the proposed development is located within land designated by policy EM2 of the NLDP as a site where Class B employment opportunities are encouraged.

- 5.26 Plasterboard manufacturing is classed as a B2 land use and will provide sought-after employment opportunities, including those within the manufacturing sector. The proposed development has the potential to generate 70 full-time (FTE) jobs within the plasterboard production warehouse. Once operational, an additional 130 indirect employment opportunities are possible through the facilities' supply chain.
- 5.27 The proposed development will therefore make an important contribution to providing jobs that have the potential to support local economic prosperity and well-being.

## Climate Change and the Natural Environment (Sustainability)

- 5.28 Environmental sustainability is a key theme within PPW10 (section 3.7). Overarching principles include ensuring development maximises energy efficiency and the efficient use of other resources, including land), maximising sustainable movement, minimising the use of non-renewable resources and encouraging decarbonisation.
- 5.29 PPW10 recognises an energy hierarchy (section 5.7.14), with the Welsh Government expecting all new development to mitigate the causes of climate change. The hierarchy is concerned with reducing energy demand and increasing energy efficiency through the location and design of development and meeting energy demand with renewable and low carbon sources.
- 5.30 Section 5.8 of PPW10 indicates that the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of climate change and future effects of climate change through the incorporation of effective mitigation and adaption measures. A Welsh Government priority is to secure zero carbon buildings whilst continuing to promote a range of low and zero carbon technologies as a means to achieve this.
- 5.31 NLDP Policy SP1 seeks a positive contribution to sustainable development, including reducing energy consumption, increasing energy efficiencies, use of low and zero carbon energy sources and the efficient use of water. Policy GP1 of the NLDP sets out further clarification on measures to address climate change. These include designing development to minimise energy requirements and incorporating appropriate renewable, low or zero carbon energy sources, including on site energy provision, where practicable, be designed to reuse or recycle existing construction materials present on site and meet the relevant BREEAM level. It should be noted that BREEAM is now only required for certain projects where Welsh Government funding is sought and is not applicable to these proposals. NLDP Policy GP6 says that development should be designed to be inherently robust, energy and water efficient and allow for the flexible re-use of buildings.
- 5.32 TAN 8 (Renewable Energy) seeks the consideration of renewable energy sources, energy efficiency and conservation measures.



- 5.33 As required by the energy hierarchy, section 5.8.3 of PPW10, TAN8 and policies GP1 and GP6 of the NLDP to mitigate the causes of and adapt to climate change, the following design principles are integral to the proposed plasterboard manufacturing facility:
- The location of the proposed development within a port, facilitates the sustainable transportation of the raw material to the point of manufacture.
  - The building has been designed with a fabric first approach to energy and resource efficiency with current Building Regulation 'U' values to enhance thermal efficiency within the building.
  - Where possible, materials will be sourced from the local market to minimise embodied carbon and transport miles.
  - Utilisation of green renewable energy made available via two wind turbines and solar PV array within the Port.
  - Surplus water used during the manufacturing will be collected in underground tanks, cleaned and recycled back into the manufacturing process.
  - The provision of cycle storage to encourage sustainable modes of transport to work.
  - Notwithstanding the intended immediate use, the facility has been designed to allow future operations by another manufacturer to be accommodated within, thus providing future flexibility.
- 5.34 A key component of PPW10 is also making best use of material resources and promoting the circular economy. There should be an emphasis on reuse, repair and recycling through the construction process to prevent the depletion of non-renewable resources and waste arising (section 5.11.3 and 5.11.4). There should be a preference for use of renewable resources and promotion of recycled and secondary materials where they are suitable and available. Opportunities should be taken to reduce or recycle waste as part of the design, construction and operation of new buildings (section 5.12.1). Furthermore, development should be designed to achieve an earthwork balance to minimise cut and fill (section 5.12.4).
- 5.35 In line with PPW10, Policy SP20 of the NLDP seeks to secure the sustainable management of waste arising in Newport. It recommends the preparation of a Site Waste Management Plan to encourage resource efficiency and to reduce, recycle and re-use waste on-site as sustainably as possible.
- 5.36 The Site Waste Management and Natural Materials Plan submitted with the planning application provides a preliminary forecast of the materials anticipated to be used and wastes produced during the construction and operation of the facility. The plan outlines the relevant policy and guidance and how the development will be managed to handle materials and wastes in a sustainable manner.
- 5.37 The construction phase waste will be managed in accordance with the principles in the waste hierarchy and cost restraints, using the following phased approach: reducing the amount of waste generated, encouraging re-use/recycling waste where possible, and finally removing remaining waste to an appropriate management facility.
- 5.38 The development must seek to minimise the natural environment burden of materials required for construction and operation of the facility. This will be achieved through minimisation of waste generation and repurposing of available materials, whether available

on site or created during construction.

- 5.39 The recycling and re-use will be implemented through the SWNMMP, which will dictate site-specific protocols for the management of waste, reflecting best practice guidance. This will include:
- Designing the construction site for effective material storage and segregation; and
  - Establishing recovery targets and recording the volume of materials re-used on site.
- 5.40 PPW10 also encourages an innovative approach to recycling (section 5.12.8) and policy SP1 of the NLDP requires the minimisation, re-use and recycling of waste. During operation of the plasterboard facility, design features will be incorporated within the proposed development to facilitate increased recycling performance overall. This includes providing sufficient storage for recyclable materials generated in plasterboard production, alongside the recycling of plasterboard as process feedstock and the reprocessing of reject produce.
- 5.41 Overall, it is considered that the proposed construction and operation of the proposed development takes forward the principles set out in PPW10 relating to making best use of material resources and promoting the circular economy.
- 5.42 PPW10 promotes the delivery of multi-functional green infrastructure, indicating that it can make a significant contribution to the sustainable management of natural resources (section 6.2.2). PPW10 seeks the enhancement of the built environment by integrating green infrastructure into development through “appropriate site selection and use of creative design” (section 6.25). Policies SP2 and GP5 of the NLDP similarly require developments to provide green infrastructure and retain elements of biodiversity and green infrastructure, including enhancing or creating new green infrastructure where possible respectively.
- 5.43 To meet these policies, green infrastructure proposals are included as part of the development and are set out in the Illustrative Green Infrastructure Plan that accompanies this planning application. The green infrastructure proposals principally comprise the habitat corridor, which seeks to provide suitable habitat for foraging and movement for wildlife along the length of the site; a new belt of structural landscape planting along the north western boundary to connect the habitat corridor; the habitat enhancement area to the south which seeks to maximise open mosaic habitat on the site through a regime of scrub management; and, landscaping at the facility entrance comprising amenity grassland, including meadow grassland where practicable, and standard tree planting.

## Design

- 5.44 PPW10 identifies that good design is fundamental to the creation of sustainable places where people will want to work. Design incorporates the relationship between the natural and built environment; it is not only concerned with architecture. Five key objectives for good design are identified as access, character, community safety, environmental sustainability, and movement (paragraph 3.3).
- 5.45 The layout, form and scale and visual appearance of proposed development and its relationship to its surroundings are important planning considerations that should be advised by a site and context analysis (paragraph 3.14). Paragraph 3.7 and 3.8 promote environmental sustainability through encouraging an integrated and flexible approach to design to ensure that the adaptability of buildings and site treatments including green infrastructure contribute to resilient development and environmental quality. Paragraph 3.17

- advises that applicants should take an integrated and inclusive approach in preparing design and access statements that is proportionate to the scale and type of development proposed.
- 5.46 Paragraph 3.5 and 3.6 advises that development proposals should address the issues of inclusivity and accessibility for all, provide flexibility in use and provide buildings and environments that are convenient and enjoyable to use. Measures to reduce and prevent crime will contribute to a safe environment and community well-being (paragraph 3.11).
- 5.47 Section 5 of the PPW sets out specific guidance on productive and enterprising places advising that these places should be designed and sited to make them easy to walk and cycle to and around; to be accessible by public transport; to minimise the use of non-renewable resources; and to make use of renewable and low carbon energy sources.
- 5.48 NLDP Policy GP2 is concerned with the general amenity and includes a requirement that the proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area. The policy is also concerned with designing out the opportunity for crime and anti-social behaviour, the promotion of inclusive design and adequate amenity for future occupiers.
- 5.49 Policy GP6 of the NLDP sets out the general principles of good design and aims to create a safe, accessible, attractive and convenient environment. It lists six fundamental design principles that should be addressed including the site context; permeability and layout of the development; character of the area; scale and form of development; materials and detailing; and sustainability.
- 5.50 TAN12: Design (2009) provides supplementary advice on how 'Promoting sustainability through good design' and 'Planning for sustainable building' may be facilitated through the planning system.
- 5.51 From an analysis of the above policy and supporting text, it is considered that the design of the proposed development is wholly appropriate for its context within the Port of Newport and meets the objectives of PPW10 and the policies in the NLDP.
- 5.52 The proposed development will be located within the Port estate and will be occupied by a manufacturer of plasterboard. The general appearance of the building will be in keeping with the character of surrounding land uses which are characterised by Port operational uses. There will be no general public access or general public use of the building, which is to be accessed via private, internal Port access roads.
- 5.53 The design of the manufacturing plant has been primarily driven by the prospective occupier who requires a building that is fit for purpose to meet the requirements of the plasterboard manufacturing process. Paragraph 3.12 of this supporting planning statement, summarises the key design issues that have shaped the design and layout of the proposed development.
- 5.54 The scale and massing of the proposed building is appropriate for its location and comparable with other facilities within the Port of Newport, including the warehouse facility on the adjacent Speedy Hire site to the north. The building will comprise a simple warehouse-style structure with a steel portal frame and be constructed of standard, readily available materials that reflect the character of the area.

- 5.55 The principles of Secured by Design, a police initiative that improves the security of buildings and their immediate surroundings, have been taken into account in the design and layout of the proposed development. The external areas have been designed and located to create a functional, attractive and accessible site. The car parking, cycle parking and general waste and recycling bins will be located in close proximity to the welfare facilities and access road. The staff and visitor entrance and parking areas will be landscaped to contribute to the sense of place and screen operational areas of the site.
- 5.56 A separate and safe access to the site for visitors and staff will ensure the ease of access for all users of the site. Separate access serving the operational needs of the manufacturing process will comprise a separate northern access for outbound materials and a southern access for the inbound raw bulk materials.
- 5.57 Office and car/cycle parking areas located in the north of the site will be separated from the site distribution yard and from the raw material processing plant in the south and west of the site by landscaping.
- 5.58 External building mounted lighting will be installed to provide amenity illumination where necessary. Access roads to the proposed development are private and are only accessible via Port controlled barriers and security kiosks at the entrance/exit via the security controlled Dock Gates. Car parking and cycle parking has been located in visible areas to the east of the development site to allow for natural surveillance at all hours.
- 5.59 The main building has been designed with a fabric-first approach, which involves maximising the performance of the components and materials that make up the building fabric first, and for durability and resilience as described at paragraphs 4.74 – 4.75.
- 5.60 The layout, form and scale and visual appearance of proposed development and its relationship to its surroundings is, therefore, considered appropriate to its local context. The external layout of the site has been designed to provide a safe and attractive environment that will be accessible to all and that will contribute to general wellbeing. The proposed development is therefore considered to be in accordance with PPW10 policies and policies GP2 and GP6 of the NLDP.

## Transport and Parking

- 5.61 PPW10 aims to ensure that new development is located and designed to minimise the need to travel, reduce dependency on the private car and enable sustainable access to employment. This is to be achieved through integrating development with sustainable transport infrastructure and designing schemes which maximise provision and use of sustainable forms of travel (paragraph 4.0.3).
- 5.62 New development through their design and supporting infrastructure must prioritise provision for access and movement by walking and cycling to maximise their contribution to the objective of the Active Travel Act 2013 (paragraph 4.1.33). New development must provide appropriate levels of secure, integrated, convenient and accessible cycle parking.

- 5.63 PPW10 promotes a design-led approach to the provision of car parking, recommending that an appropriate level of parking is integrated in a way which does not dominate the development and informed by local context (paragraph 4.1.51). PPW10 further recommends support for schemes which keep parking levels down.
- 5.64 PPW10 is supported by TAN 18: Transport which sets out more detailed guidance on transport to achieve the objectives sets out in PPW10. TAN18 advises at D.4 that a Transport Assessment will be required for developments that are categorised as 'Industry' and are over 5,000m<sup>2</sup> gross floor area.
- 5.65 TAN18 requires planning authorities to promote the carriage of freight by rail, water or pipeline rather than road where it forms a feasible alternative for part or all of the journey. Paragraph 8.15 advises that coastal shipping in conjunction with the major navigable waterways provides an environmentally friendly means of moving freight. Development which attracts substantial movements of freight (including large scale warehousing, distribution and manufacturing which uses bulky raw materials or produces bulky products) should be located away from congested inner areas and residential neighbourhoods (paragraph 8.12).
- 5.66 NLDP Policy SP2 says that development proposals should seek to maximise their positive contribution to health and well-being by being located in the most sustainable locations, close to public transport and providing efficient walking and cycling routes. NLDP Policy SP15 sets out the Council's commitment to pursuing integrated transport, with facilities for public transport, walking and cycling incorporated into major new development.
- 5.67 NLDP Policy GP4 sets out planning policy on highways and accessibility in line with national planning guidance set out in PPW10. Development is to provide appropriate access to pedestrians, cyclists and public transport; make adequate provision for car parking and cycle storage; provide suitable and safe access arrangements; and ensure that development will not be detrimental to highway to pedestrian safety or result in traffic generation exceeding the capacity of the highway network. Policy T4 requires development to provide appropriate levels of parking in accordance with adopted parking standards. The adopted parking standards are set out in Newport City Council's Parking Standards supplementary planning guidance (2015).
- 5.68 Policy T2 of the NLDP favours the location of developments which generate heavy commercial vehicle movements where there is access to a railway line, wharf or dock, or if this is not appropriate, at locations readily accessible to strategic and principal routes. Policy T4 sets out a Road Hierarchy used to determine the principle of access for new developments. Policy M4 favours the sustainable transportation of aggregate from existing wharves.
- 5.69 A Transport Assessment (TA) has been submitted with the planning application which provides traffic and transport information in relation to the proposed development. The TA has been based on the 24 hour operation of the facility over three shift patterns (08.00 – 16.00, 16.00 – 00.00, 00.00 – 08.00) with no more than 35 staff on site at any one time. The proposed development is expected to generate minimal trips in the peak hours due to these shift patterns.

- 5.70 It is expected that 70% of HGV trips will be bulk material arriving on the site internally and delivered within the Port minimising the impact of traffic on the highway network (an average of 15 (30 two way) HGV trips a day). Gypsum, the mineral which comprises the primary raw material for plasterboard, will arrive via sea utilising the Port's mineral quay import and storage facilities, supported by PPW10, TAN18 and NLDP policy M4.
- 5.71 The site also has excellent connectivity with direct road access to the A48 Southern Distributor Road to the M4. These connect Newport to key UK markets, enabling the import of the remaining raw materials by road and the onward distribution of the finished plasterboard product to domestic and export markets by road (or alternatively by sea should it prove to be commercially viable). Access to the site from the A48 will be via Tom Lewis Way, an internal port road that already serves other industries within Newport Docks and which is well suited to meet the operations of the proposed development.
- 5.72 Notwithstanding its excellent connectivity, minimal HGV trips are anticipated. HGV movements delivering raw bulk material to the site from outside of the port will be spread across a 24 hour period and on average will be only 10 (20 two way) HGV trips per day.
- 5.73 The distribution of the finished plasterboard product by road will generate an average of 20 HGV (40 two way) trips per day and these trips can be scheduled to minimise impact on the local highway network at peak hours.
- 5.74 To maintain operational efficiency, two dedicated access points will be provided for operational purposes which will provide suitable and safe access to the site to meet the requirements of Policy GP4. The southernmost access will be for HGVs delivering raw materials direct to the site, whether by road or internally within the Port from the minerals wharf. The northern most access will be for HGVs only, that will distribute the finished plasterboard product to markets within the UK and beyond.
- 5.75 The external operational area comprises a large delivery yard to the southeast of the site providing sufficient space for HGVs delivering bulk raw materials to the site to safely manoeuvre and stand for loading and unloading without any inconvenience to road users or to staff and visitors. A separate yard for the loading and shipment of the finished plasterboard products, with four proposed loading docks, is located to the north west of the site.
- 5.76 Having regard to the need to prioritise provision for access and movement by walking and cycling, the Transport Assessment (figure 3.3) indicates that a considerable area of Newport, including residential areas and the railway station, will be accessible to the proposed development by bicycle. The site is well located to the existing National Cycle Network (NCN) and Route 4 which is an off-road footway/cycleway along the A48 Southern Distributor Road with onward links to Newport City Centre.
- 5.77 The external layout of the proposed development has been designed to encourage sustainable means of transport. A dedicated access path for pedestrians and cyclists will be provided at the centre of the site as shown on drawing **01001**.
- 5.78 The number of cycle spaces to be provided is in excess of the Council's cycle parking standards with 30 long stay and 15 short stay cycle space proposed. The cycle spaces will be located close to the main entrance and will be situated to allow for natural surveillance and will be appropriately lit.



- 5.79 The access to the site for those travelling by car is separate from the two dedicated operational access points for HGV traffic. The Transport Assessment estimates that the maximum car movements to the site are expected to be up to 22 vehicles at any one time based on shift patterns. All trips would be outside of the traditional peak hours, with the exception of those travelling home when the shift finishes at 08.00 am. The remainder of the staff will use sustainable travel modes such as cycle and public transport or will car share.
- 5.80 22 car parking spaces will be provided, inclusive of two accessible spaces to be located closest to the office and welfare facilities. NCC's SPG on Parking Standards notes that the parking standards are a guide to ensure that appropriate and sufficient levels of parking requirements is provided to avoid the need for vehicles to park on the street. The number of car parking spaces is considered commensurate to the number of staff that will be present on the site at any one time and having regard to national and local planning policies which seek to reduce dependency on the private car and meet the objectives of the Active Travel Act to encourage walking and cycling.
- 5.81 Notwithstanding the initial transport assessment, a TRICs trip generation exercise has been carried out for robustness based on the site operating on a traditional model of traffic movements arising at peak hours. The results of this assessment are presented in the Transport Assessment. Under this sensitivity analysis it is predicted that the development would generate up to 32 two-way vehicles in the AM peak and 19 two-way vehicles in the PM peak. Even at this level, traffic is not considered to give rise to an unacceptable impact on highway safety or a severe impact on the road network.
- 5.82 It is therefore considered that the proposed development is in accordance with the guidance set out in PPW10 and TAN18 and complies with NLDP policies GP4, T2 and T4. The plasterboard manufacturing process will rely on the sustainable import of gypsum via the Port, with 70% of HGV movements being internal to the Port. This will therefore minimise the impact of traffic generation on the local highway network. The anticipated number of HGV and vehicle movements on the highway network is estimated to be small and will not give rise to an unacceptable impact on highway safety or a severe impact on the road network. Provision is in place to encourage sustainable modes of transport to the site including suitable and safe access to the site for pedestrians and cyclists.

## Air Quality

- 5.83 Good design promotes environmental sustainability and can help to ensure high environmental quality (PPW10 paragraph 3.70). Addressing environmental risks can make a positive contribution to environmental protection and improvement including addressing improved air quality. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity (paragraph 3.21). Where health or amenity impacts cannot be overcome satisfactorily, development should be refused.
- 5.84 PPW10 paragraph 6.7.4 advises that the planning system should maximise its contribution to well-being goals by aiming to reduce the population's exposure to air and noise pollution. The aim should be to reduce, or at least, minimise population exposure to air pollution, where it is practical and feasible to do so. Paragraph 6.7.7 advises that it may be necessary for a technical air quality assessment to be undertaken by a suitably qualified and competent



- person on behalf of the developer.
- 5.85 Potentially polluting development, including industrial development, should be located in areas where there is a low potential for public exposure, or where that impact can be minimised. The potential for temporary environmental risks to arise during construction, including airborne pollution should be considered, and where appropriate, a construction management plan may be required (PPW10, paragraph 6.7.26)
- 5.86 The NLDP policies GP2 and GP7 do not permit development that would have a significant adverse effect on local amenity or an unacceptable harm to public health because of air quality impacts in line with national guidance set out in PPW10. Supplementary planning guidance on Development Management Air Quality (February 2018) sets out the circumstances when an assessment of air quality is required and clarifies the appropriate minimum amount of information required for the air quality assessment.
- 5.87 An Air Quality Assessment (AQA) has been submitted with the planning application in accordance with the Department of Environment, Food and Rural Affairs' (Defra) current Technical Guidance on Local Air Quality Management (LAQM) (TG16). The assessment considers whether the proposed development achieves compliance with the national Air Quality Objectives as well as national, regional and local planning policy.
- 5.88 The assessment addresses the effects of air pollutant emissions from traffic using the adjacent roads, and emissions associated with the development of the site. In addition, a risk-based assessment of the likely impact of construction on the air quality of the local environment has been conducted in accordance with the Institute of Air Quality Management's 2014 edition of the Guidance on the assessment of dust from demolition and construction.
- 5.89 In line with PPW10, the proposed development is located in an area where there is a low potential for public exposure, or where that impact can be minimised.
- 5.90 The AQA considers the impacts of the development on the local area examining traffic-related emissions and combustion emissions from onsite plant. It concludes that due to limited traffic generation, as well as a flue design that disperses pollutants before they reach sensitive receptors, the impact of emissions from the proposed development is considered to be "negligible" and it is therefore highly unlikely that on-site pollutant concentrations would exceed either long or short term air quality objectives.
- 5.91 In respect of non-combustion process emissions, the only zone within the proposed development that will feature processes that create dust will be inside the building in the solid additives area. All air expelled from the factory will go through sleeve filters to collect dust so there will be no dust emitted to the outside of the building as a result of this process. All movements of gypsum will also occur inside a closed area that will also vent through the filters.
- 5.92 With regards to the impacts of construction dust on air quality and other pollutant emissions from the construction and demolition phases of the construction, there are no existing dwellings in the areas that are considered to be high sensitivity receptors, even up to 350m of the site boundary. The sensitivity to dust soiling effects on people and property is assessed as low for all activities.

- 5.93 The Severn Estuary SSSI lies within 50m of the site boundary, which is considered to be a high risk site. In line with IAQM Guidance a number of effective risk appropriate mitigation measures will be incorporated as best practice as set out in the AQA. Site wide mitigation includes a communication strategy and the preparation of a Dust Management Plan (DMP), site management measures, site monitoring, site preparation and maintenance, site operations and waste management. Further specific mitigation measures are also identified based on site specific risks in relation to earthworks, construction and trackout. With these measures in place, residual dust impacts are not considered significant.
- 5.94 It is therefore considered that the proposed development is in accordance with PPW10 and NLDP policies Policy GP2 and GP7 as it would not have a significant adverse effect on local amenity or give rise to unacceptable harm to public health.
- 5.95 The Air Quality Assessment also considers the possibility of significant adverse effects on European sites which could undermine the achievement of conservation objectives. The Assessment examines both atmospheric NOx at ground level as well as NOx deposition on both the Severn Estuary and River USK SACs, as well as the Severn Estuary, River Usk and Gwent Levels SSSIs. The assessment identified the need for further ecological examination of the predicted levels. This analysis is included in the EclA which concludes that no significant adverse effects on designated sites is predicted from NOx emissions.
- 5.96 In conclusion, in accordance with the requirements of PPW10 and NCC's Supplementary planning guidance on Development Management Air Quality the planning application is accompanied by an Air Quality Assessment. This demonstrates that, with mitigation, impacts during construction will be managed and will not give rise to environmental or amenity effects. In terms of operation, the assessment has concluded that it is highly unlikely that on-site pollutant levels would exceed either long or short term air quality objectives. Overall, it is therefore considered that in terms of air quality, the proposals adhere to local and national policy.

## Noise

- 5.97 Paragraph 3.7 and 3.8 of PPW10 recognises that good design promotes environmental sustainability, including the prevention of pollution. Addressing environmental risks can make a positive contribution to environmental protection. Paragraph 6.02 advises that features such as soundscapes give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles. Paragraph 6.71 further emphasises that an appropriate soundscape contributes to a positive experience of place as well as being necessary for public health, amenity and well-being. Resilient locational choices for infrastructure and built development should take account of air and noise pollution amongst other considerations to secure multiple benefits as part of individual development proposals (paragraph 3.32).
- 5.98 A key planning principle of PPW10 is to consider the effects proposed developments may have on soundscape quality. Developers should address any implications arising where there are sensitive receptors and seek to incorporate measures which reduce overall exposure to noise pollution (paragraph 6.7.5 and 6.7.6).
- 5.99 PPW10 notes that potentially polluting development includes commercial and industrial development. Such development should be located in areas where there is a low potential for public exposure, or where its impacts can be minimised (paragraph 6.7.15). The potential

- impacts of noise pollution must be fully considered to ensure that the effects of new development can be adequately controlled to safeguard amenity and any necessary measures and controls incorporated (paragraph 6.7.24).
- 5.100 Temporary environmental risks during the construction phase of development should be considered. Where appropriate a construction management plan will be required covering pollution prevention including noisy plant (PPW10, paragraph 6.7.26).
- 5.101 TAN11 on Noise provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
- 5.102 Paragraph 8 of TAN11 advises that local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. Noise characteristics and levels can vary substantially according to their source and the type of activity involved. The character of the noise should be taken into account as well as its level, including sudden impulses, irregular noise or noise which contains a distinguishable continuous tone.
- 5.103 Policy GP2 of the NLDP will not permit development where there is a significant adverse effect on local amenity including noise. The scale, nature and siting of a proposal must be appropriate to the location and must not undermine the character of either the site or the locality.
- 5.104 NLDP Policy GP4 (criterion iii) advises that development should be designed to avoid or reduce transport severance, noise and air pollution.
- 5.105 A Noise Impact Assessment has been submitted with the planning application. The following paragraphs consider the outcome of that assessment in relation to national and local planning policies for noise.
- 5.106 The site is located in a suitable location for industrial development within an existing industrial landscape associated with Newport Docks and is some distance from sound sensitive receivers (SSRs). The closest SSR is a farmhouse approximately 680m from the site. The closest residential estate is approximately 1.3km away around Morgan Way, Dyffryn on the west side of Lighthouse Road.
- 5.107 Based on the results of an environmental noise survey that has been undertaken covering weekday and weekend periods to assess the existing noise climate at the closest SSRs, environmental noise criteria are proposed to ensure that the plant rating level (BS4112 2014) does not exceed pre-existing typical background  $L_{90}$  at the SSRs.
- 5.108 External operations are relatively limited in the context of the location of the site within an established Port. Vehicle movements will largely be limited to daytime hours during normal operations. On exception, lorry movements may occur outside these hours (e.g. following periods of maintenance outages to main production) in order to meet customer requirements.
- 5.109 Best available techniques to minimise external noise impact are embedded into the development proposal. The factory layout has external forklift operations on the eastern side of the factory away from the closest SSRs with no operations on the western side.
- 5.110 The main building will be set back from the road by an adequate distance to allow articulated lorries to drive in and out of the site in forward gear, reducing noise from reversing alarms.

- Reversing alarms are proposed to be broadband self-adjusting volume systems that automatically set the volume relative to the prevailing ambient level (subject to this being acceptable from a Health and Safety viewpoint). Yards and access roads will be smooth with no speed humps to avoid noise impact from braking and accelerating vehicles.
- 5.111 Measures will also be in place to minimise noise breakout from internal operations. A sound insulation performance requirement has been specified for the factory wall and roof cladding system to ensure noise levels at the SRRs will be within the proposed environmental noise limits. Acoustically rated access doors (including large roller shutter doors) are proposed on the critical western elevation and returns. The silo feeding operations will be fully enclosed within the factory.
- 5.112 Internal building services plant and the main flues (intakes and discharges) are proposed to be supported independent of the main lightweight factory structure to avoid the risk of structure borne noise and drumming and will incorporate appropriate proprietary vibration isolation. All plant is proposed to be designed to an initial source limit of 60dB(A) @ 3m to ensure that the SSR criteria are not exceeded during normal plant operations.
- 5.113 A 10m wide strip of vegetation is also proposed at the western boundary of the site. Whilst the primary function of this is for nature conservation, the presence of vegetation may help to scatter and reduce the perception of noise as recognised in the Noise and Soundscape Action Plan 2018 – 2023 prepared by the Welsh Government.
- 5.114 A CEMP has been submitted with the planning application which sets out best practical means that will be taken during the construction period to minimise noise impact in line with BS5228:2009 Part 1 – ‘Code of Practice for Noise and Vibration Control on Construction and Open Sites’. Given the distance of the site from the closest SSRs, noise emissions are not likely to be significant. At the closest SSR (680m), the source site sound power levels are indicated to fall by around 70dB with distance and air and ground absorption losses. At this distance, vibration is also not considered to be an issue, however it is recommended that industrial sites immediately adjacent to the site are checked for any vibration sensitive equipment.
- 5.115 Inevitably on most construction sites, significant noise levels of a temporary and short term nature may be generated in the immediate vicinity of the site from activities such as piling. A noise map plotted for a ‘worst case’ drop hammer tubular steel casing indicates that the noise site criteria (65dBL<sub>Aeq</sub>) are met at the closest SRRs.
- 5.116 In respect of off-site noise impact on existing roads, the noise assessment concludes that the level of movement off-site on and approaching a well-established Port, will not approach (or come close to) the percentage of overall flow rates required to generate any significant impact on the existing road traffic noise climate having regard to guidance in The Department of Transport’s ‘Design Manual for Roads & Bridges’. Impact of traffic associated with the construction site and operations on existing roads is therefore indicated to be negligible.
- 5.117 The noise impact assessment concludes that with appropriate measures in place, the proposed development will meet proposed environmental noise criteria during daytime and night time and will not lead to a significant adverse impact on the soundscape of the locality and the wider area. The proposed development is therefore considered to be in accordance with the requirements of PPW10 and the NLDP policies GD2 and GD4.

## Flood Risk

- 5.118 PPW10 and TAN 15 (Development and Flood Risk) set out a precautionary approach to planning and flood risk. TAN 15 outlines criteria for development and flood risk, indicating that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development has to be considered in high risk areas, only those developments which can be justified on the basis of the tests outlined in TAN 15 should be located in such areas. Development should reduce, and must not increase, flood risk on and off the development site itself.
- 5.119 Policies SP1, SP3 and GP1 of the NLDP in turn follow the national policy and guidance on flood risk, with policy SP3 indicating that *‘Development will only be permitted in flood risk areas in accordance with national guidance’*.
- 5.120 A Flood Consequence Assessment (FCA) and SuDS Strategy has been prepared and submitted alongside this planning application in accordance with relevant national and local policy, including TAN 15, PPW and policy SP3 of the NLDP. In addition, site-specific advice has been sought from NRW, and NCC in its capacity as the Lead Local Flood Authority (LLFA) and SuDs Approving Board (SAB), and the LPA.
- 5.121 Separate to the planning application, a SuDS application will be made in accordance with Schedule 3 to the Flood and Water Management Act 2010. The SuDS proposals are set out in the SuDS Strategy and the separate SuDS application. Appendix D of the FCA and SuDS Strategy document shows the drainage strategy for the proposed development, which has been designed in accordance with relevant policy and standards, including the Statutory SuDS Standards, paragraphs 6.6.17 to 6.6.19 of PPW, section 8 of TAN 15 and policy SP4 of the NLDP. Given the location adjacent to estuarine waters, it also takes into consideration ‘Guidance on Standard S2’ within paragraph G2.1 of the Statutory SuDS Standards.
- 5.122 The following paragraphs set out the outcome of the FCA in relation to national and local policy for development and flood risk.
- 5.123 The site is predominantly located within flood zone C2, with a small area of flood zone B in the north of the site adjacent to Tom Lewis Way. The area of Flood Zone C2 extends over the South Dock, Ebbw River, River Usk and landside areas of the Port to the east. The extent of Flood Zone B extends north and covers the remainder of the Port. Flood Zone C2 is defined as an area of flood plain without significant flood defence infrastructure, and where only less vulnerable development should be considered, subject to application of the justification test, including acceptability of consequences.
- 5.124 The proposed plasterboard manufacturing facility is general industrial development, falling under use class B2, and is therefore ‘less vulnerable development’ under section 5 of TAN 15. As such, the consequences of flooding are less significant than highly vulnerable or emergency services development, as it would not impact on public services or impact traumatically on people’s lives. The occupants will furthermore have a greater ability to decide on whether they wish to accept flood risk, and are able to manage flood consequences, than highly vulnerable or emergency services development.

- 5.125 The site is expected to operate 24 hours/day and there will be no residential accommodation or provision for sleeping on-site, and the site will not be open to the general public. As such all persons present on the site will be trained for the correct evacuation procedures, and a log will be kept of persons who are present at any given time. All visitors to the site will be accompanied by a member of staff who will direct them in the event of an evacuation.
- 5.126 Given the above, the proposed development is of a nature and type which can be located within Flood Zone C2 in accordance with section 5 of TAN 15, subject to the justification test and the acceptability of consequences considered below.
- 5.127 As the development lies within Flood Zone C2, the justification test set out in section 6 of TAN 15 is required. The overall justification for the location of the proposed plasterboard manufacturing facility is set out in detail in the consideration of the need for the development in section 3 of this statement, and the assessment of the principle of development outlined previously in this section.
- 5.128 The proposed development's location within Flood Zone C2 in the Port of Newport is necessary to contribute to key employment objectives supported by NCC and the Welsh Government, as the development will generate approximately 70 FTE direct jobs and support an additional 130 indirect jobs in the supply chain. The site is the only location currently available within the Port of Newport which meets the specific requirements of the prospective client and ABP.
- 5.129 The proposed development also supports the aims of PPW10, including those relating to well-being and the creation of sustainable places, and economic development. Whilst the site may not technically meet the definition of previously developed land in PPW10, this should not preclude its development, given its location on a previously used site within the operational Port of Newport and the important economic benefits it will bring to Newport.
- 5.130 As summarised under this heading and set out in the FCA, the potential consequences of a flooding event for the particular type of development proposed have been considered, and the proposed development is acceptable in terms of the criteria contained in sections 5 and 7 and appendix 1 of TAN 15.
- 5.131 As such, the proposed development is clearly appropriate and justified for its location, according with section 6 of TAN 15 as far as possible. The following paragraphs of this section set out the conclusions of the FCA in accordance with section 7 and appendix 1 of TAN 15.
- 5.132 Based on a 75 year design life in accordance with Welsh Government advice on climate change allowances for planning purposes (CL-03-16), the predicted future flood level has been determined for 2094. As the mechanism of flooding is both fluvial and tidal, the 1 in 200 year future event was considered in the FCA.
- 5.133 In order to address this flood risk, it is proposed that the site levels are raised from the existing levels of 7.60–9.00m AOD to 9.63m AOD. This will raise the Finished Floor Level (FFL) of the development above the future flood level of 9.43m AOD resulting from a 1 in 200 year event, taking into account the predicted impact of climate change, Welsh Government advice on climate change allowances, and allowing for a 'freeboard allowance' of 200mm.



- 5.134 With this mitigation, the FCA highlights that the flood risk to the proposed development is considered to be medium/low from tidal/fluvial sources.
- 5.135 The FCA indicates that, whilst raising ground levels will remove flood storage area, this will not require compensation as it will have no effect on the flood level on the site and on the nearby area. This is because ground level changes will not affect sea level, as any displaced volume would be spread over a large area. The drainage strategy again is discharging to estuarine waters and therefore will not affect the current or future flood levels. Therefore the proposed development will not increase flood risk elsewhere.
- 5.136 With regard to access and egress, this will be from/onto Tom Lewis Way, which to the north is higher than the existing site levels and located within Flood Zone B. Emergency protocols, based on egress northwards on Tom Lewis Way, will be developed to manage flood consequences down to acceptable and safe levels. These protocols will be incorporated into ABP's existing Port-wide Flood Evacuation Plan. The development will be signed up to the NRW flood warning service to give advanced notice of potential flooding events.
- 5.137 Some materials will be present on the site, and stored within the main building, due to the manufacturing process. A silt trap and petrol interceptor is included within the proposed surface water drainage network, which will capture spilt materials rather than them being washed into watercourses.
- 5.138 As explained in the FCA, the risks of flooding from groundwater, surface water, private drainage, reservoirs, canals and artificial sources, are all considered to be low. As there are no public sewers in the vicinity of the site there is no risk of flooding from sewers.
- 5.139 In light of the above and the findings of the FCA, the consequences of flooding are considered to be acceptable for the nature of the development proposed. As such, the proposed development meets the tests set out in section 7 of TAN 15.
- 5.140 Overall, the proposed development is of a nature and type which can be located within Flood Zone C2, it is appropriate and justified for its location, and the consequences of flooding are considered acceptable. The proposals will not increase river and coastal flooding on the site itself, and will not increase flooding elsewhere. The proposed development therefore accords as far as possible with relevant national and local policy, including section 6.6 of PPW and sections 5, 6 and 7 and appendix 1 of TAN 15, and in turn with policies SP1, SP3 and GP1 of the NLDP.

## Landscape and Visual Impact

- 5.141 PPW10 identifies that the special characteristics of an area should be central to the design of a development including its layout, form, scale and visual appearance and its relationship with its surroundings (paragraph 3.9).
- 5.142 PPW10 advises that the character of local landscapes should also be protected and enhanced and local authorities may identify and designate Special Landscape Areas (SLA) and set out planning policies to protect, conserve or enhance historic landscape features, characteristics and qualities of local significance (paragraph 6.3.11).



- 5.143 The NLDP Policy SP8 designates the Wentlooge Levels to the west of the proposed development as an SLA where priority is given to landscape conservation and enhancement. Development proposals are required to contribute positively to the area and be designed to respect the valued characteristics of the recognised landscape.
- 5.144 Policy CE4 of the NLDP identifies the Gwent Levels as a registered Landscape of Outstanding Historic Interest which should be protected, conserved and enhanced, including its setting.
- 5.145 NLDP Policy GP2 set out more general development principles. Criterion (ii) permits development that will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area.
- 5.146 NLDP Policy GP5 permits development where there would not be an unacceptable impact on landscape quality; and where the proposal includes an appropriate landscape scheme which enhances the site and wider context including green infrastructure and biodiversity networks.
- 5.147 NLDP Policy GP6 sets out the fundamental design principles that should be considered including the context of the site; development should be sensitive to the unique qualities of the site and respond positively to the character of the area.
- 5.148 PPW10 also recognises that the interface between land and sea gives rise to the unique characteristics associated with coastal areas. Paragraph 6.5.7 advises that areas considered unsuitable for development may include those where there is visual intrusion and inter-visibility between land and sea, which will need to be considered carefully; and where access to coastal paths should be protected. Policy T8 of the NLDP requires development to protect and enhance the All Wales Coastal Path.
- 5.149 A Landscape and Visual Appraisal has been submitted with application, in line with current good practice, which considers the potential effects of the proposed development upon the landscape and impacts on visual amenity.
- 5.150 The site does not lie within or adjacent to any national designations, it is however within the Gwent Levels, a national landscape character area (NLCA). The Wentlooge Level Special Character Area (SCA) is one of three character landscape types within the Gwent Levels which is a landscape registered as being of Outstanding Historic Interest (OHI).
- 5.151 The site and its immediate setting is identified as 'built-up land (LTE E) in the Gwent Levels Landscape Character Assessment and is heavily influenced by the docks immediately to the north-east, the industrial context to the east of the River Usk, the power station to the south-east and the southern edge of Newport to the north/north-east. The overall sensitivity of the site and its immediate setting to the type of development proposed is therefore considered low.
- 5.152 Given the disturbed nature of the site and its industrial context, impacts would arise from the introduction of a new built form. There would be a small loss of scrub during the construction period to construct the hardstanding and building platform and there would also be an increase in vehicular activity within the Site.
- 5.153 The magnitude of impact on the site and its immediate setting during construction is assessed to be low. With the site's sensitivity to development of this nature, the level of effect is slight adverse. During operation, with the retention of a corridor of scrub habitat supplemented with proposed structural landscape planting, effects are considered to be

negligible to slight beneficial.

- 5.154 In respect of visual impacts, receptors are largely confined to people at places of work in and around the docks and along the eastern banks of the River Usk, plus recreational users along the public rights of way, including the Wales Coastal Path long distance trail, and around the Newport Wetlands National Nature Reserve.
- 5.155 The extent of visibility to and from the site is largely confined to the local area. Views in the immediate vicinity are controlled by existing built form within the Docks to the north and industrial development and the power station along the eastern banks of the River Usk. Views from the wider areas are controlled by the level local landscape, with views from Newport towards the site limited by the Docks to the north, the railway embankment and vegetation along the road and railway infrastructure corridors to the west.
- 5.156 There is no predicted adverse effect on recreational users along the majority of the length of the Coastal Path except for along a short stretch of the path along the eastern banks of the river Usk, and from the west.
- 5.157 Residential receptors are restricted to dwellings at long distance on elevated ground where properties are orientation toward the site and not visually impacted by other intervening built form. Any effects are therefore assessed to be no greater than negligible during construction and operation.
- 5.158 There may be views from the highest parts of Tredegar Park, although these would be fleeting, very distant, and heavily filtered by woodland within the park. Although potentially discernible from highest areas unimpeded by screening the proposed development would not alter the nature of the existing views which already include the docks.
- 5.159 In conclusion the site's landscape has the ability to absorb change and the effects of the proposed development would not give rise to any unacceptable landscape and visual harm. For these reasons, the development is considered to be compliant with PPW10 and NDLP policies SP8, CE4, GP2, GP5 and GP6.
- 5.160 Trees, hedgerows, groups of trees and areas of woodland which have ecological value and contribute to the character or amenity of a particular locality or perform a beneficial and identified green infrastructure function are also protected by PPW10 (paragraph 6.4.25). NDLP Policy GP5 permits development that includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have amenity or wildlife value. NCC also have in place a Trees, Woodland and Hedgerows and Development Site SPG (2017) which is a material consideration in the determination of the all planning applications.
- 5.161 In accordance with NCC's SPG an Arboricultural Impact Assessment (AIA) compliant with BS 5837:2012 has been submitted with the planning application. The AIA has evaluated the direct and indirect effects of the proposed development on the trees and hedgerows surveyed.
- 5.162 There are no tree preservation orders (TPOs) or conservation area constraints on the site and no veteran trees or ancient woodlands within or adjacent to the site.

- 5.163 In order to facilitate the proposed scheme, a number of trees will however require removal as set out in the AIA. These trees are generally of low quality and their removal will have a low local amenity impact. The Green Infrastructure Plan, along with detailed planting plans Sheets 1 and 2, set out the green infrastructure proposals that will mitigate the loss of trees from the site.
- 5.164 Trees to be retained on the Site will be protected during the proposed works with tree protection fencing as shown on the AiA Tree Protection Plan (CA11637-005). The tree protection fencing will be erected on site prior to all development works commencing on site, including ground works and will not be removed until the development is completed.
- 5.165 For the above reasons, the proposed development is considered to be compliant with PPW10, Policy GP5 of the NDLP and NCC's Trees, Woodland and Hedgerows and Development SPG.

## Habitats and Biodiversity

- 5.166 PPW10 seeks to protect the special and unique characteristics and intrinsic quality of the natural and built environment in their own right including nature conservation features (paragraph 6.0.2).
- 5.167 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) that applies to all local authorities in the exercise of their functions in relation to Wales. Paragraph 6.4.3 and 6.4.4 of PPW10 advises that development proposals must consider the need to support the conservation of biodiversity, in particular the conservation of wildlife and habitats, and meet international obligations and protect statutorily and non-statutory designed sites. Protected and priority habitats must be safeguarded from impacts which directly affect their nature conservation interests and compromise the reliance of ecological networks; and the enhancement and improvements to ecosystems resilience must be secured. Where adverse effects on the environment cannot be avoided or mitigated, it will be necessary to refuse planning permission. Paragraph 6.4.11 reiterates this advice and requires planning authorities to have regard to the relative significance of international, national and local designations in considering the weight to be attached to nature conservation interests.
- 5.168 Paragraph 6.4.21 sets out the step-wise approach that local planning authorities should take to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated and as a last resort compensated for; enhancement must be secured whenever possible.
- 5.169 Paragraph 6.4.5 advises that development should not cause any significant loss of habitats or populations of species, locally and nationally and must provide a net benefit for biodiversity. Paragraph 6.2.2 recognises that green infrastructure makes a significant contribution to the management of sustainable resources in particular, maintaining and enhancing biodiversity and the resilience of ecosystems.
- 5.170 Planning authorities are under a duty to have regard to the requirements of the Habitat Regulations. TAN 5: Nature Conservation and Planning advises that local planning authorities may require the applicant to carry out an appropriate assessment under the Habitat Regulations where it is considered that a development is likely to have a significant effect on a European site.

- 5.171 TAN 5 further advises that the information submitted with the planning application should be proportional to the likelihood of effects on nature conservation interests and to their potential significance.
- 5.172 The NLDP sets out a number of policies to deliver national planning policy objectives. General principles for the natural environment are set out in Policy GP5 which permits development that is designed and managed to protect and encourage biodiversity and ecological connectivity. Development should demonstrate how it avoids, or mitigates and compensates negative impacts to biodiversity, including ensuring that there are no significant adverse effects on areas of nature conservation interests, international, European, national and local protected habitats and species. The policy also permits proposals which incorporate an appropriate landscape scheme that includes biodiversity networks and appropriate tree planting or tree retention, which avoid the unacceptable loss of features that have a wildlife or amenity value.
- 5.173 Policy SP1 amongst other objectives seeks to conserve, enhance and link green infrastructure to protect and enhance the built and natural environment.
- 5.174 Supplementary planning guidance (SPG) on Wildlife and Development (August 2015) provides specific direction on how biodiversity should be conserved and enhanced throughout the development control process, whilst drawing on national planning policy, and the policies contained in the NLDP Plan.
- 5.175 The planning application is supported by an Ecological Impact Assessment (EclA) which considers the potential effect of the proposal development on statutory and non-statutory designated sites, priority habitats, protected and priority species (including bird, bats, reptiles and invertebrates), badger and non-native invasive species (Japanese knotweed).
- 5.176 The site is located in close proximity to the internationally protected Severn Estuary SPA, SAC, Ramsar and SSSI (0.05km to the south west) and the River Usk SAC and River Usk (Lower Usk) SSSI (0.18km south east). The Gwent Levels St Bridge SSSI and Newport Wetland SSSI and National Nature Reserve of national importance are within 0.5km of the site. There are also 6 SINC's (non-statutory nature conservation designations) in the immediate vicinity of the site.
- 5.177 During the construction phase, the EclA assesses the likely indirect effects of the development to the qualifying features of international, national and local designations having regard to paragraph 6.4.11 of PPW10 and Policy GP5 of the NLDP.
- 5.178 Indirect construction effects on these international, national and local designations may include those arising from noise, vibration, light, air quality and dust emissions, and reducing water quality. The CEMP accompanying the planning application sets out measures to minimise the likely of significant adverse construction effects. The CEMP covers a wide range of matters and the EclA concludes that with appropriate measures in place adverse effects impacts on the features for which these sites have been designated are unlikely to arise for the following reasons:
- There will be no significant loss of riparian otter habitats as a result of the proposed development as the works will not take place within 20m of the banks of the River Ebbw;
  - Birds can habituate to regular noise resulting from piling activity after a short period;

- As the River Ebbw lies between the development site and the reen system of the Gwent Levels it is considered unlikely that the construction phase will significantly affect the water quality of the reen system within the SSSI.
- As the development site is not located immediately adjacent to the Severn Estuary and River Usk designations and construction including piling will not take place within or immediately adjacent to these watercourses or banks and mudflats, there will be no significant adverse effect on these species from noise or vibration during construction of the development.
- The scrub belt along the western boundary will be retained and will be unlit to provide foraging habitat for bats. It will also act as a buffer to light disturbance to avoid the disturbance of wintering birds. All security light will be kept to a minimum and directed away from western and southern boundaries;
- No vegetation clearance will be undertaken during the bird breeding season (March to August inclusive) or otherwise areas of vegetation requiring clearance will be checked by a qualified ecologist 24 hours in advance of works. If any nests are found, works will cease and an ecologist consulted. Post construction monitoring surveys for breeding birds and invertebrates will be undertaken;
- Reasonable Avoidance measures under a Precautionary Working Method Statement (PWMS) will be implemented to protect reptiles present on the site;
- Best practice dust mitigation is incorporated into the CEMP. These measures will control dust emissions during construction to avoid adverse effects on the adjacent salt marsh vegetation and consequently bird foraging habitat;
- Best working practices to reduce noise and vibration emission will be employed. This includes the restriction of piling works to outside of the wintering bird period (March to October inclusive);
- Water pollution will be minimised and controlled in line with industry best practice guidance.

- 5.179 With these measures in place, secured through the CEMP, it is concluded that there will be no significant, long term residual effects at any scale on the International, National designations and their qualifying features from noise, lighting and dust emissions. For these reasons, the proposed development, accompanied by a CEMP, is considered to be in accordance with policy advice in PPW10 and Policy GP5 of the NLDP.
- 5.180 Given the proximity of the proposed development to internationally designed sites and potential for Likely Significant Effects (LSE), information to inform an Appropriate Assessment (AA) under the Habitat Regulations, is included as part of the planning application.
- 5.181 Consistent with the EcIA, the AA has concluded that the identified disturbance effects from noise, water pollution and lighting can be mitigated by the implementation of construction industry best practice measures and through design and operational procedures which can be secured through the CEMP. As a result, the AA concludes that there will be no adverse disturbance effects arising from the project and in combination with other development sites on the ecological integrity of the Severn Estuary SPA, SAC and Ramsar and River Usk SAC.

- 5.182 An assessment of the potential effects of atmospheric emissions of NO<sub>2</sub> and nitrogen disposition from the proposed development alone and in combination with other project has been assessed in the EclA. This assessment concludes that no significant adverse effects on designated sites is predicted from NO<sub>x</sub> emissions during the operational phase of the development and in-combination with other proposed developments on the saltmarsh components of the Severn Estuary designations. Therefore, no indirect effects on qualifying fauna species which depend on these habitats is predicted either.
- 5.183 There will be permanent habitat loss as a result of the proposed plasterboard manufacturing facility development. Field surveys and assessments have therefore been undertaken in line with current specialist best practice guidance, the results of which are presented in the EclA.
- 5.184 Open mosaic habitats (OMH) on previously developed land and ephemeral/short perennial and scattered scrub mosaic (ESP/SS) is present on the development site and these are identified as priority habitats. The site also contains dense shrub of local conservation value. Approximately 1.1ha of ESP/SS habitat will be lost as a result of the proposed development, associated infrastructure and landscaping. This habitat loss will be a direct, permanent impact which is irreversible and will result in a significant adverse effect at a county scale. As such, mitigation and compensation measures to offset the impact of the development on biodiversity are proposed as part of the development proposal.
- 5.185 The 0.56 ha on-site Habitat Enhancement Area (HEA) will be managed to ensure EPS/SS habitat type in the application area is maintained and enhanced. Dense scrub will be removed from the HEA allowing this area to be colonised by the existing seed bank in the surrounding EPS/SS habitat or from collecting the seedbank from areas of EPS/SS removed from the development site.
- 5.186 ABP is also offering a 1.13 ha off-site Additional Habitat Enhancement Area (AHEA) within the wider Port estate. In the long-term, this will retain ephemeral / short perennial and scattered scrub habitat to compensate for the loss of this habitat type to the proposed development. This would increase the area of EPS/SS habitat at Newport Docks and benefit a wider range of invertebrates. An area of swamp vegetation will also be retained and managed to diversify the habitats available in the long term for invertebrates.
- 5.187 It should be noted that for both enhancement areas, without management any existing open mosaic habitat would more than likely transition to dense scrub and this priority habitat within these areas would diminish. The retention and creation of EPS/SS and its management to maintain the structure and diversity of species present is therefore critical. The management measures for the on-site HEA will be set out and delivered through an Ecological Management Plan (EMP) covering a 20 year period. A separate EMP will be prepared for the off-site AHEA, if required by NCC.
- 5.188 It has therefore been demonstrated, through the measures incorporated into the development that the adverse effects of the development on the EPS/SS can be partially mitigated and then be compensated for in accordance with PPW10 (Paragraph 6.4.11 and Paragraph 6.4.21) and Policy GP5 of the NLDP. Furthermore, in accordance with NCC Wildlife and Development SPG, the proposals provide compensation for the loss of EPS/SS at a ratio of 1:1.5.



- 5.189 The EclA identifies the presence of bird, bats, reptiles and invertebrate species on the development site at the time of the survey. The EclA concludes, in accordance with NDLP Policy GP5, that the proposed development will not give rise to significant effects on these species provided that there are measures in place to maintain and enhance biodiversity and the resilience of ecosystems in and around the site once the site is operational. These measures are set out in full within the EclA and are briefly covered below.
- 5.190 The proposed development, together with the off-site AHEA, includes the retention and creation of a total of 1.69 ha which will be managed to ensure EPS/SS habitat type is maintained. This will retain suitable habitat on site for a range of terrestrial invertebrates as well as providing foraging habitat for bats and birds.
- 5.191 In accordance with PPW10 and Policies GP5 and SP1 in the NLDP the proposed 0.52 ha Habitat Corridor between the built development and the River Ebbw to the west will encourage ecological connectivity and enhance biodiversity and the resilience of ecosystems.
- 5.192 Ecological enhancements proposed to provide a net benefit for biodiversity include:
- Planting within the proposed development comprising native species of local provenance.
  - Enhancement of retained areas of ESP/SS including controlling scattered scrub (willow, buddleia and bramble scrub) and coarse grass species and maintaining areas of disturbed and bare ground.
  - Provision of hibernacula and log piles providing suitable habitat for invertebrates as well as reptiles.
  - Two bat boxes and two bird boxes mounted on poles within the retained scrub along the western boundary of the development site.
- 5.193 As set out above, the proposals fully address any biodiversity impacts and as such, it can be concluded that the proposed development is in accordance with PPW10 and TAN5 and Policy GP5 of the NLDP and the SPG on Wildlife and Development.

## Land Contamination and Geotechnical

- 5.194 PPW10 promotes environmental sustainability and recognises that addressing environmental risks can make a positive contribution to environmental protection and improvements including addressing land contamination. In development management decisions, paragraph 6.9.18 requires local planning authorities to take into account the nature, scale and extent of land contamination which poses risks to health and the environment; and to ensure that the site is capable of effective remediation and is suitable for its intended use.
- 5.195 Where contamination issues arise, and it is known that acceptable remediation measures can overcome contamination, planning permission may be granted subject to any necessary planning conditions specifying the necessary measures and the need for their implementation.



- 5.196 Policy GP7 of the NLDP does not permit development which would cause or result in unacceptable harm to health because of land contamination, instability or subsidence or any other identified risk to the environment, local amenity or public health and safety. Developments that could cause or be affected by such harm will be required to demonstrate that the development can successfully mitigate against harmful effects.
- 5.197 The following paragraphs consider the likely effects of the proposed development in respect of land contamination having regard to the requirements of the above national and local planning policies.
- 5.198 A Phase 1 Geo-environmental and geotechnical desk study has been submitted with the planning application. The report identifies the likely ground conditions beneath the site, potential contamination sources, pathways and receptors and potential contamination constraints and liabilities that may arise in connection with the present or proposed use of the site. The report has been undertaken in accordance with recognised UK best practice.
- 5.199 The site is currently densely vegetated, vacant, disused brownfield land that historically has been reclaimed from the Ebbw River. A significant thickness of made ground exists, following the infilling of a river meander and two smaller drainage reens that historically flowed through the site.
- 5.200 A desk study review of information and existing site data concludes that there is a low risk of contamination associated with the made ground/historical legacy of the site, with exception to the potential presence of asbestos where the risk is concluded to be moderate/low. Any made ground containing unacceptable concentrations of contaminants or asbestos would likely be mitigated using a traditional 'cap and cover' system. This may necessitate adoption of a clean cover system in landscaped areas, with all other areas being capped with hard standing/the building etc.
- 5.201 The risk classification for ground gas has been assessed as moderate to high based on the gas concentrations observed during field monitoring. The risk of ground gas migration and accumulation will need to be mitigated by a robust gas protection system during and after construction.
- 5.202 A supplementary site investigation and risk assessment will be undertaken and a remediation strategy developed for the site in order to mitigate any unacceptable risks to a satisfactory level.
- 5.203 Other constraints on the site include Japanese Knotweed, observed within the southern site area, and a low risk of unexploded ordnance. Appropriate measures will be adopted to address these.
- 5.204 General mitigation measures to protect site users and neighbours from the risks of contamination during the construction works are set out in the CEMP that has been submitted with the planning application. These measures include dust control to minimise the potential for contaminated soil/dust deposits on the site and in the immediate locality (such as dampening down materials and covering material during transportation); measures to avoid the spillage and leakage of fuel, oil or chemicals from plant and vehicles; and ensuring that all personnel onsite are aware of, and implement, standard good practice measures.

- 5.205 In respect of geotechnical matters, enabling works are required to raise site levels to achieve a FFL of 9.63m AOD which will entail the construction of an engineered soil platform across the proposed development area. The foundations for the proposed warehouse structure are intended to comprise of piles, end bearing on competent strata at depth. Given the thickness of the Made Ground layer, which can vary between 0.3 m and 3.0 m, and the thickness of the underlying highly compressible Tidal Flat Deposits, which can vary between 9.5 m and 13.7 m, the proposed solution for ground improvement (soil consolidation) is to install band drains to accelerate the settlement and time for consolidation, and to reduce the risk of excessive total and differential settlement during/post construction. Alternatively, the enabling works will entail construction of a piled transfer blanket and the proposed building will also be piled and this solution is likely to be more favourable to construction timescales and reduces the risk of settlement issues.
- 5.206 A robust and resilient strategy to deal with potential contamination and instability/subsidence will therefore be in place to ensure the necessary remediation measures and on-site best practice measures will be implemented throughout the construction and operational phases of the development. On this basis, it is considered that the proposed development will not give rise to any unacceptable harm to health because of land contamination, instability, subsidence or any other identified risk to the environment, local amenity or public health and safety and is in accordance with PPW10 and NLDP Policy GP7.

## Archaeology and Heritage

- 5.207 Section 6 of the PPW10 advises that the planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment. Decisions must be based on Cadw published Conservation Principles and on an understanding of the impact a proposal may have on the significance of an historic asset.
- 5.208 Paragraph 6.17 advises that the setting of an historic interest is an important consideration in protecting, conserving and enhancing the significant of historic assets. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.
- 5.209 Paragraph 6.1.21 advises that an assessment of development on a historic landscape may be required if it is proposed within a registered historic landscape or its setting and there is potential for conflict with development plan policy.
- 5.210 TAN24 best practice guidance sets out specific guidance on how the planning system should consider the historic environment. Where historic assets are to be affected by a proposed development TAN24 advises that it is for applications to provide the local planning authority with sufficient information to allow the assessment of their proposals.
- 5.211 Section 4.2 of Technical Advice Note 24 outlines the need for considering archaeology and heritage during development. There is a presumption in favour of the physical preservation of scheduled monuments or other nationally important archaeological remains affected by development. In cases involving less than significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against all other factors, including the need for the development.
- 5.212 Objective 5 of the NLDP (2015) is to ensure that all development or the use of land does not adversely affect and seeks to preserve or enhance, the quality of the historic and built

- environment. Policy SP9 seeks the conservation, enhancement and management of recognised sites within the natural, historic and built environment. Sites included in the register of landscapes, parks and gardens of special historic interest, including their settings, are protected by Policy CE4 and are to be conserved and enhanced.
- 5.213 Development proposals will normally be required to undertake an archaeological impact assessment where it is proposed within areas of recognised archaeological interest in accordance with Policy CE6.
- 5.214 The site contains no statutory designated heritage assets and does not fall within any wider landscape designation. A Zone of Theoretical Visibility (ZTV) and accompanying Site visits (where publicly accessible) assessed the visibility of Scheduled Monuments up to a distance of 5km from the site and World Heritage Sites, Listed Buildings, Registered Parks and Gardens, Registered Battlefields and Historic Landscapes up to a distance of 3km from the site.
- 5.215 In respect of Scheduled Monuments, it is considered that whilst there is potential for inter-visibility with Tredegar hill fort (MM084) located 3.25km north-west of the Site and Coed y Defaid Camp (MM134) located 4.32km north-west of the site, these monuments are generally screened in views from the site by extensive vegetation and those views that are possible from the monuments towards the site would perceive the proposed development at a distance and in the context of the present extensive industrial development of the Newport Docks area. Therefore, it is anticipated that the resulting change within the distant setting of either monument would not affect an appreciation of their heritage values and their significance.
- 5.216 In respect to Registered Parks and Gardens, there are three designated parks and gardens within the 3km search area comprising the grade II registered Bellevue Park and St Woolas Cemetery located to the north of the Site and the grade II\* registered Tredegar Park located to the north-west of the Site.
- 5.217 This ZTV survey identifies that there is no inter-visibility with St Woolas Cemetery. Some inter-visibility is identified between the Site and Tredegar Park and Bellevue Park however views would perceive the proposed development at a distance and within views which present existing built form within their vicinity and which present the site in the context of the present extensive industrial development of the Newport Docks area.
- 5.218 Overall, it is therefore considered that there would be no direct impact on any designated heritage asset.
- 5.219 The site is located 140m east of Historic Character Area 15 Eastern St Brides which forms part of the Gwent Levels Historic Landscape Area (HLA), a designated Historic Landscape of Outstanding Historic Interest. A Heritage Impact Assessment has therefore been submitted with the planning application having regard to the guidance published by the Welsh Government and Cadw 'The setting of Historic Assets in Wales' (2017). This report has assessed the potential impact of the proposed development on the significance of the Gwent Levels HLA within the vicinity of the site, having regard to its evidential, historic, aesthetic and communal values. The assessment concludes that the site does not provide any contribution to the understanding of the heritage values of the Gwent Levels HLA and neither positively nor negatively contributes to its setting.
- 5.220 Mitigation measures have however been embedded in the design of the development to minimise harm on the HLA including measures to ensure that the mass and, scale of the building is proportional to existing industrial development within the dock area and is aligned

with the industrial units to the north of the site. It is considered that the variation of ridge heights and the fragmentation of external elevations (recessed sections/advanced sections) will break up the expanse of the elevation. The proposed development will therefore be viewed within the context of the existing industrial landscape associated with Newport Docks. The habitat strip along the western boundary of the site will also provide some screening of the development in the east/north east facing views from the site which will soften its edge.

- 5.221 It is therefore concluded that the proposed development will result in no change to the elements of the Gwent Level HCA's setting and no harm to the overall significance of the historic landscape. The proposed development is therefore in compliance with PPW10, TAN24 and NDLP policies SP8, SP9 and CE4.
- 5.222 In respect of archaeology, the site is not within an area of recognised archaeological interest. As area has already been heavily altered by past dock-side activities and consists of made ground, the risk of affecting archaeological remains is likely to be very low. NCC's archaeologists have advised that there is no requirement for any archaeological mitigation as set out in a letter dated 24<sup>th</sup> September 2019 in response to the pre-application enquiry.
- 5.223 It is not therefore envisaged that the proposed development will have a negative impact on the archaeology present in both immediate and wider surrounding area. The proposed development is therefore in compliance with PPW10, TAN24 and NDLP policies CE6.

## Infrastructure

- 5.224 PPW10 (paragraph 5.1.1) recognises that infrastructure, be it physical, electronic or digital plays a pivotal role in maintaining the economic well-being of Wales. PPW10 Paragraph 3.5.7 defines adequate and efficient infrastructure as including transport, water supply, sewers, sustainable waste management, electricity and gas (the utilities) and telecommunications. It advises that development will need to be located where it is well serviced by existing or planned infrastructure.
- 5.225 Paragraph 6.6.9 advises that the adequacy of water supply and sewerage infrastructure should fully considered when proposing development because of the consequential environmental and amenity impacts associated with a lack of capacity. New development should be located and implemented with sustainable provision of water services in mind, using design approaches and techniques which improve water quality and minimise adverse impacts on water resources.
- 5.226 Paragraph 6.6.21 and Circular 08/2018 (*Planning requirement in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants*) advises development that proposes the use of non-mains drainage will only be considered where it can be shown that connection to the mains sewer is not feasible taking into account the cost and/or practicability for doing so. Treatment plants should offer full treatment with the final effluent discharge from it meeting the standard and conditions set by Natural Resources Wales. The proposal for a package plant should also set out clearly the responsibility and means of operation and maintenance to ensure the discharge permit or the relevant exemption conditions will be met throughout the life of the plant (paragraph 2.5, Circular 08/2018).

- 5.227 In line with national guidance, Policy GP3 of the NLDP advises that development must not have an unacceptable impact on the existing or proposed level of service infrastructure provision. This includes power supplies, water, means of sewage disposal and telecommunications. Development will be permitted where necessary and appropriate service infrastructure either existing or can be provided and; where is no capacity in the public foul sewer, that satisfactory improvements can be provided by the developer.
- 5.228 The following paragraphs assess the infrastructure requirements of the proposed development and explain how these requirements will be met, having regard to the requirements of the above national and local planning policies.
- 5.229 In respect of sewerage infrastructure, as no public foul sewers are present within the docks it is not possible to connect the development to the main system. A package treatment plant is therefore proposed with discharge to the River Ebbw. The outfall from the treatment plant would be shared with the surface water outfall from the site as shown on the drainage strategy drawing in Appendix D of the Flood Consequence Assessment and Sustainable Drainage Strategy is submitted as part of this planning application.
- 5.230 The process for manufacturing is a closed system and does not produce effluent which would run through the foul system. Therefore, the only effluent being processed will be domestic equivalent which is suitable for a standard package treatment plant.
- 5.231 The foul and surface water network will be privately maintained. Monitoring arrangements include telemetry which will be installed on the petrol interceptor to indicate when it is getting full for emptying. A regular maintenance schedule will be prepared as recommended by the manufacturer of the proprietary unit. The package treatment plant will also include telemetry to indicate that it is functioning correctly and will be on a regular maintenance schedule as recommended by the manufacturer of the proprietary unit.
- 5.232 The headwall and non-return valve at the discharge point will be inspected after high water levels within the Ebbw River to ensure it is free flowing and clear of potential blockages.
- 5.233 An environmental permit to permit discharge to the River Ebbw will be obtained from Natural Resources Wales, if required.
- 5.234 A new metered water supply will be provided by Dwr Cymru Welsh Water to the boundary of the site, from its potable water main in Tom Lewis Way.
- 5.235 A tank will be provided on site with associated plant and fencing to facilitate the delivery and storage of liquid natural gas (LNG), LNG will be tankered to the site and the tank will have the capacity to store up to 40 tonnes. If required, Hazardous Substance Consent will be sought by the operator for the storage.
- 5.236 In respect of process water supply, an extended connection from the site boundary will be made to the production process area. Welsh Water is aware of the requirement for a water supply for the manufacturing process and further discussions will take place should the scheme be approved. Water efficiency will be achieved during manufacture as surplus water will be collected in underground tanks, cleaned and recycled back into the manufacturing process.

- 5.237 A new HV metered electrical supply will be provided from the existing ABP Port HV network. The HV cabling will terminate within the main building and supply a 1MVA HV/LV transformer to provide a dedicated Low Voltage (LV) supply to the manufacturing plant.
- 5.238 In respect of telecommunications, ducts will be provided from the existing Openreach network running around the ABP site. The ducts will connect into the Openreach network locally to the site and terminate within the building for future connection by the tenant.
- 5.239 Adequate arrangements will be made for waste management as set out in the Site Waste and Natural Materials Management Plan (SWNMMP) that has been submitted as part of the planning application. The SWNMMP sets out details of the materials anticipated to be used and waste produced during the construction and operation of the facility, and how these will be sustainably managed.
- 5.240 Design features will be incorporated within the proposed development to facilitate increased recycling performance overall. This includes providing sufficient storage for recyclable materials generated in plasterboard production, alongside the recycling of plasterboard as process feedstock and the reprocessing of reject produce.
- 5.241 Separate general waste and recycling waste bin stores will be located in the east of the site in close proximity to the offices and welfare facilities. These will cover standard domestic-type waste and recycling products.
- 5.242 It is proposed that the occupier will enter into an agreement with either the local authority or a registered disposal company to collect and dispose of the waste. Waste collection vehicles will access and egress the site via the staff and visitor vehicular entrance.
- 5.243 For the above reasons it is considered that the proposed development makes provision for appropriate service infrastructure and, where necessary, proposes satisfactory infrastructure improvements to ensure that the development is acceptable and meets the requirements of PW10, Circular 08/2018 and NDLP Policy GP73.



## 6 Sustainable Development Appraisal

### Introduction

- 6.1 The Welsh Government adopted its first sustainable development scheme ‘Learning to Live Differently’ in 2000, which was made under Section 121 of the ‘Government of Wales Act 1998’.
- 6.2 Subsequently, the ‘Government of Wales Act 2006’ set a legal duty on the Welsh Ministers to make a scheme (‘the sustainable development scheme’) setting out how they propose to promote sustainable development. This was published as ‘One Wales: One Planet - The Sustainable Development Scheme of the Welsh Assembly Government’ (2009), which set out the Government’s vision of a sustainable Wales and confirmed sustainable development as the central organising principle of the Welsh Assembly Government (now referred to as the Welsh Government).
- 6.3 In ‘One Wales: One Planet’, sustainable development is defined as;
- “Enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own and future generations”,
- and the ‘Vision of a Sustainable Wales’ is one where Wales:
- lives within its environmental limits, using only its fair share of the earth’s resources so that our ecological footprint is reduced to the global average availability of resources, and we are resilient to the impacts of climate change;
  - has healthy, biologically diverse and productive ecosystems that are managed sustainably;
  - has a resilient and sustainable economy that is able to develop whilst stabilising, then reducing, its use of natural resources and reducing its contribution to climate change;
  - has communities which are safe, sustainable and attractive places for people to live and work, where people have access to services, and enjoy good health; and
  - is a fair, just and bilingual nation, in which citizens of all ages and backgrounds are empowered to determine their own lives, shape their communities and achieve their full potential.
- 6.4 In 2012, the Welsh Government issued a white paper called ‘A Sustainable Wales - Better Choices for a Better Future’ that was a forerunner of the Well-being of Future Generations (Wales) Act 2015, here on referred to as the WFGA. It makes reference to the Welsh account of sustainable development, providing an emphasis on social, economic and environmental wellbeing, whilst taking into account the causal effects on future generations.

## The Sustainable Development Principle

- 6.5 The WFGA strengthens the sustainable development framework in Wales and places a statutory duty on public bodies to carry out sustainable development (under Section 3 of the WFGA) by taking action in accordance with the sustainable development principle. Newport City Council is a 'public body' under this act. As a public body, WFGA should be considered in its decision-making. The WFGA outlines five ways to show the application of sustainable development principles. These five ways of working and how they are applied is explained below.

### 1. Long Term

The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs

### 2. Integration

Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their objectives, or on the objectives of other public bodies

### 3. Involvement

The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves

### 4. Collaboration

Acting in collaboration with any other person (or different parts of the body itself) to assist the body to meet its well-being objectives

### 5. Prevention

How acting to prevent problems occurring or getting worse may help public bodies meet their objectives

## Contribution to Well-being Goals & Objectives

- 6.6 The WFGA establishes seven overarching goals that public bodies must work to achieve. Each goal along with a description is presented below.

Wellbeing Goal	Description
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change), and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing

	people to take advantage of the wealth generated through securing decent work.
A resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances are (including their socio-economic circumstances)
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities
A Wales of vibrant culture and Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being

6.7 As set out in the WFGA, the action a public body must take in carrying out sustainable development must include:

- a) setting and publishing objectives ("well-being objectives") that are designed to maximise its contribution to achieving each of the well-being goals; and
- b) taking all reasonable steps (in exercising its functions) to meet those objectives.

6.8 The Welsh Government has taken an integrated approach to help ensure there is a clear relationship between; the wellbeing goals, the Programme for Government (Taking Wales Forward), its four cross-cutting strategies and its current wellbeing objectives, as published in its Wellbeing Statement in 2017. Each wellbeing objective addresses one or more of the wellbeing goals and contributes to one or more of the four cross cutting strategies. The Wellbeing Statement sets out how its current wellbeing objectives relate to each of the wellbeing goals.

6.9 The wellbeing objectives of the Welsh Government, Newport City Council and Natural Resources Wales are outlined below for convenience.

#### **Welsh Government**

6.10 The Welsh Government first published 14 wellbeing objectives in November 2016. These were then revised to 12 wellbeing objectives as part of its Wellbeing Statement 2017 for the remainder of the government term up to 2021. They are:

1. Support people and businesses to drive prosperity;
2. Tackle regional inequality and promote fair work;
3. Drive sustainable growth and combat climate change;
4. Deliver quality health and care services fit for the future;
5. Promote good health and well-being for everyone;

6. Build healthier communities and better environments;
7. Support young people to make the most of their potential;
8. Build ambition and encourage learning for life;
9. Equip everyone with the right skills for a changing world;
10. Build resilient communities, culture, and language;
11. Deliver modern and connected infrastructure; and
12. Promote and protect Wales' place in the world.

### **Newport City Council**

6.11 Newport City Council has published four local wellbeing objectives within its Wellbeing Statement (2017) which include:

1. To improve skills, educational outcomes and employment opportunities;
2. To promote economic growth and regeneration while protecting the environment;
3. To enable people to be healthy, independent and resilient; and
4. To build cohesive and sustainable communities.

6.12 Newport City Council's Wellbeing Statement explains why it considers that its wellbeing objectives will contribute to the wellbeing goals, how its objectives have been set in accordance with the sustainable development principle, and what steps it will take to meet the wellbeing objectives in accordance with the sustainable development principle. It also outlines how it will govern itself to meet its wellbeing objectives and how it will ensure that resources are allocated annually to take steps to meet its objectives.

### **Natural Resources Wales**

6.13 Natural Resources Wales has a published seven wellbeing objectives in its Wellbeing Statement (2017), which also form part of its Corporate Plan to 2022. They are:

1. Champion the Welsh environment and the sustainable management of Wales' natural resources;
2. Ensure land and water in Wales is managed sustainably and in an integrated way;
3. Improve the resilience and quality of our ecosystems
4. Reduce the risk to people and communities from environmental hazards like flooding and pollution;
5. Help people live healthier and more fulfilled lives;
6. Promote successful and responsible business, using natural resources without damaging them; and
7. Develop Natural Resources Wales into an excellent organisation, delivering first-class customer service.

- 6.14 Natural Resources Wales' Wellbeing Statement explains how its wellbeing objectives contribute to the wellbeing goals for Wales, how it will allocate its resources to them, and how it will keep them under review.

## Sustainable Development Appraisal

- 6.15 The proposed development has been considered against the well-being objectives set out by the Welsh Government, Newport City Council and Natural Resources Wales. A sustainable development appraisal is set out below to assist Newport City Council in their decision-making and their responsibilities under the WFGA.
- 6.16 The appraisal considers how the proposal contributes to each of the wellbeing goals and the wellbeing objectives of the relevant public bodies.

### A Prosperous Wales

- 6.17 As outlined in local and national planning policy, the Newport Docks are considered to be crucial in supporting existing industry and employment in Newport and Wales. It is estimated the Newport Docks contributes £186million to the Welsh economy annually and supports approximately 3,000 local jobs. The Port supports Wales and its international connectivity to markets including steel production, agriculture, recycling, distribution and logistics. The Newport LDP identifies and allocates the Newport Docks for employment development over the plan period. Newport City Council is committed to furthering the economic growth of Newport Docks by supporting complementary use class facilities, such as the proposal's B2 classification.
- 6.18 Further employment and training opportunities may be created for workers in the local area, during the implementation of the proposal. This benefits the commitments of the Welsh Government in ensuring that as many construction jobs as possible are filled by local workers with opportunities for local benefits.
- 6.19 This proposal helps Newport Docks by providing industrial jobs and employment opportunities, in turn aiding the Dock's continued efforts to contribute to a prosperous Wales.
- 6.20 The relevant public body well-being objectives that the proposal would therefore support and contribute to the Prosperous Wales goal are:

#### Welsh Government

- Support people and businesses to drive prosperity
- Tackle regional inequality and promote fair work
- Support young people to make the most of their potential
- Build resilient communities, culture and landscape
- Promote and protect Wales' place in the world

#### Newport City Council

- To improve skills, educational outcomes and employment opportunities
- To promote economic growth and regeneration while protecting the environment

### **Natural Resources Wales**

- Help people live healthier and more fulfilled lives
- Promote successful and responsible business, using natural resources without damaging them

### **A Resilient Wales**

- 6.21 The processing of gypsum and the manufacture of plasterboard at the point where it is imported represents sustainable development, utilising low carbon maritime transportation of the mineral.
- 6.22 The main building has been designed with a fabric-first approach to energy and resource efficiency and for durability and resilience.
- 6.23 Enhancing green infrastructure is embedded within the proposed development, including the habitat corridor to provide suitable habitat for foraging and movement for wildlife along the length of the site and a new belt of structural landscape planting along the north western boundary to connect the habitat corridor. In addition, there are habitat enhancement areas both as part of the development and off-site.
- 6.24 The proposal has been developed and designed to help minimise the effects of construction on the environment. The planning application sets out proposed mitigation to protect the environment, including the water environment. Consideration has been given, where practicable at this stage, to help reduce the potential effects of construction traffic and the noise, air quality and carbon associated with the construction phase.
- 6.25 The relevant public body well-being objectives that the proposal would therefore support and in turn contribute to the Resilient Wales goal are:

### **Welsh Government**

- Build resilient communities, culture and language
- Promote and protect Wales' place in the world

### **Newport City Council**

- To promote economic growth and regeneration while protecting the environment
- To build cohesive and sustainable communities

### **Natural Resources Wales**

- Champion the Welsh environment and the sustainable management of Wales' natural resources
- Ensure land and water in Wales is managed sustainably and in an integrated way
- Help people live healthier and more fulfilled lives
- Promote successful and responsible business, using natural resources without damaging them



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## **A Healthier Wales**

- 6.26 It is important to acknowledge that the proposal will complement the current operations of Newport Docks.
- 6.27 Potential impacts on health through contaminated land, air and noise quality have been assessed as part of the planning application. These are demonstrated to be negligible when the appropriate mitigation methods are applied.
- 6.28 Secure employment is linked to good health. As such, thinking long-term, the generation of jobs and contribution of the Newport Docks to the local economy and society could indirectly contribute to reducing stress, anxiety and associated health and socio-economic problems linked with unemployment and/or job uncertainty.
- 6.29 Overall it is considered that there would not be any significant effects relating to health. Detailed information about health-related topics (contaminated land, air quality and noise) is provided in the assessments that support the planning application.
- 6.30 Active and sustainable travel methods are supported and encouraged by Planning Policy Wales and the Newport City Council. This proposal includes efforts to support such methods of transport, through the provision of cycling storage and proximity to the National Cycling Network.
- 6.31 The relevant public body well-being objectives that the proposal would therefore support and in turn contribute to the Healthier Wales goals are:

### **Welsh Government**

- Promote good health and well-being for everyone
- Build healthier communities and better environments

### **Newport City Council**

- To enable people to be healthy, independent and resilient

### **Natural Resources Wales**

- Help people live healthier and more fulfilled lives

## **A More Equal Wales**

- 6.32 The Newport Docks supports a range of employment with a combination of low skilled and skilled jobs across industries located within the port. These associated activities contribute to the diversity of the economy, society and culture of Newport and Wales. The introduction of a new manufacturing facility, with a range of employment opportunities, helps to support the local people who live and work in Newport, as well as the local communities and their cultures. It would also provide multiplier benefits in terms of retaining people's independence and prosperity.
- 6.33 The relevant public body well-being objectives that support and in turn contribute to the More Equal Wales goal are:

### **Welsh Government**

- Tackle regional inequality and promote fair work

- Support young people to make the most of their potential
- Build ambition and encourage learning for life

**Newport City Council**

- To build cohesive and sustainable communities
- To enable people to be healthy, independent and resilient
- Help people live healthier and more fulfilled lives
- Promote successful and responsible business, using natural resources without damaging them

**Cohesive Communities**

- 6.34 The proposal will add to and enhance Newport Docks role as an active and accessible employment site, supporting local jobs and services. It will provide employment opportunities for the local community.
- 6.35 There may be opportunities for local people and businesses to deliver the necessary proposed works, which in turn helps to support local communities.
- 6.36 Relevant public body well-being objectives that the proposal would therefore support and in turn contribute to the Cohesive Communities goal are:

**Welsh Government**

- Build resilient communities, culture and language

**Newport City Council**

- To improve skills, educational outcomes and employment opportunities
- To build cohesive and sustainable communities
- To enable people to be healthy, independent and resilient
- Help people live healthier and more fulfilled lives

**Vibrant Culture and Thriving Welsh Language**

- 6.37 The Newport Docks are over 150 years old and are an important part of the cultural heritage of Newport. As such, protecting the long-term future of this area is also considered to be of importance to the cultural identity of the local community and Welsh port related industries.
- 6.38 The proposed development will enhance Newport Docks and its contribution to the local economy and employment. Aiding employment will provide both social and cultural benefits for local people and businesses. This will help promote and protect the Welsh language and Welsh culture. During the construction phase, all necessary communications and signage would be undertaken in accordance with the Welsh language duties and responsibilities of the Welsh Government.
- 6.39 The relevant public body well-being objectives that the proposal would therefore support and in turn contribute to the Vibrant Culture and Thriving Welsh Language goal are:

**Welsh Government**

- Build resilient communities, culture and language

**Newport City Council**

- To build cohesive and sustainable communities

**Natural Resources Wales**

- Promote successful and responsible business, using natural resources without damaging them

**A Globally Responsible Wales**

- 6.40 The Newport Docks are important in their role in facilitating inward investment and being a gateway for trade both to and from international markets. The Newport Docks have a significant role in promoting international connectivity to markets and businesses.
- 6.41 The Newport Docks connect communities to employment and trade, with associated economic, social and cultural benefits.
- 6.42 The proposal will help to enhance Newport Docks and its employment land, allowing for the continued benefits of its operations in the long-term. Furthermore, the proposal has been designed and developed to help ensure the protection of the environment, with a sustainable approach to construction.
- 6.43 Sustainable transport methods are encouraged by the proposal and the facilities for storage of bicycles would be provided. Encouraging sustainable and active methods of transport provides health benefits to the community and employees.
- 6.44 The relevant public body well-being objectives that the proposal would therefore support and in turn contribute to the Globally Responsible Wales goal are:

**Welsh Government**

- Support people and businesses to drive prosperity
- Promote and protect Wales' position in the world

**Newport City Council**

- To promote economic growth and regeneration while protecting the environment

**Natural Resources Wales**

- Promote successful and responsible business, using natural resources without damaging them
- Ensure land and water in Wales is managed sustainably and in an integrated way

## 7 Summary and Conclusions

- 7.1 This statement is in support of an application for planning permission for a new plasterboard manufacturing facility located within the Port of Newport.
- 7.2 The port is a hub of economic activity for the city and wider region. It provides a gateway for business engaged in international trade for the supply of raw materials and access to overseas markets for exports of finished goods. This helps to sustain and support the growth in employment and attract inward investment to the port and its hinterland.
- 7.3 The proposed development is appropriately located on vacant employment land within the operational Port of Newport in accordance with the NLDP. It will make best use of the marine and road connectivity and facilities offered by the Port and the city of Newport. The facility will furthermore meet the need for plasterboard products in the building and consumer 'DIY' industries in the UK. The manufacturing facility will generate and support high quality employment, including approximately 70 full-time equivalent (FTE) direct jobs and an additional 130 indirect jobs in the supply chain, contributing to the economic growth and development of Newport and its role as a major economic hub in the region.
- 7.4 The proposed development has been analysed against the policies in the Development Plan and together with Government policy on sustainable development, Planning Policy Wales (Edition 10, December 2018), The Wales Spatial Plan (2008), Government guidance through Technical Advice Notes (TANs) and other statutory and non-statutory guidance documents.
- 7.5 The plasterboard manufacturing facility is a B2 use class and the proposed development is located within land designated by policy EM2 of the NLDP as a site protected for Class B employment opportunities. In principal therefore the proposals are supported by and are in accordance with Policy EM2 of the NLDP, benefiting from a port location, complementing the operational use of the port and providing port related employment.
- 7.6 The proposed location of the plasterboard manufacturing facility is considered to be sustainable, being both accessible for the import of gypsum to the Ports mineral quay and utilising vacant land within an operational dock. The facility will make an important contribution to the continued economic sustainability of both Newport Docks and Newport as a whole in accordance with PPW10 and objective 3 of the NLDP, with the potential to support local economic prosperity and well-being.
- 7.7 The layout, form and scale and visual appearance of proposed development and its relationship to its surroundings is considered appropriate to its local context within the Port. The main building has been designed with a fabric-first approach to energy and resource efficiency and for durability and resilience. The external areas have been designed and located to create a functional, safe, attractive and accessible site. The proposed development is considered to be in accordance with PPW10 policies and policies GP2 and GP6 of the NLDP.

- 7.8 As required by the energy hierarchy, section 5.8.3 of PPW10, TAN8 and policies GP1 and GP6 of the NLDP design principles are integral to the proposed plasterboard manufacturing facility to mitigate the causes of and adapt to climate change.
- 7.9 A Transport Assessment (TA) has been submitted with the planning application. Having regard to the conclusions of the TA it is considered that the proposed development is in accordance with the guidance set out in PPW10 and TAN18 and complies with NLDP policies GP4, T2 and T4. The plasterboard manufacturing process will rely on the sustainable import of Gypsum via the Port, with 70% of HGV movements being internal to the Port. This will minimise the impact of traffic generation on the local highway network. Provision is also in place to encourage sustainable modes of transport to the site.
- 7.10 The planning application is accompanied by an Air Quality Assessment. This demonstrates that, with mitigation, impacts during construction will be managed and will not give rise to environmental or amenity effects. In terms of operation, the assessment has concluded that it is highly unlikely that on-site pollutant levels would exceed either long or short term air quality objectives. Overall, it is therefore considered that in terms of air quality, the proposals adhere to PPW10 and policies GP2 and GP& of the NLDP.
- 7.11 A noise impact assessment is submitted with the application which concludes that with appropriate measures in place, the proposed development will meet proposed environmental noise criteria during daytime and night time and will not lead to a significant adverse impact on the soundscape of the locality and the wider area. The proposed development is therefore considered in accordance with the requirements of PPW10 and the NLDP policies GD2 and GD4.
- 7.12 A Flood Consequence Assessment (FCA) and SuDS Strategy have been prepared and submitted alongside this planning application. Overall, the proposed development is of a nature and type which can be located within Flood Zone C2, it is appropriate and justified for its location, and the consequences of flooding are considered acceptable. The proposals will not increase river and coastal flooding on the site itself and will not increase flooding elsewhere. The proposed development therefore accords as far as possible with relevant national and local policy, including section 6.6 of PPW and sections 5, 6 and 7 and appendix 1 of TAN 15, and in turn with policies SP1, SP3 and GP1 of the NLDP.
- 7.13 A Landscape and Visual Appraisal has been submitted with the planning application. Overall, landscape impacts are considered to be minimal. The proposed development is of a comparable nature and scale to existing development at the docks and would be viewed in the context of a developed and industrial landscape. In terms of any visual impact, the extent of any visibility to and from the site would be largely confined to the local area and views controlled by the existing built form within the Docks to the north and industrial development and the power station along the eastern banks of the River Usk. The development is therefore considered to be compliant with PPW10 and NDLP policies SP8, CE4, GP2, GP5 and GP6.

- 7.14 The planning application is supported by an Ecological Impact Assessment (EcIA) which considers the potential effect of the proposal development on statutory and non-statutory designated sites, priority habitats, protected and priority species, badger and non-native invasive species. To mitigate and compensate for the potential the impact of the development on biodiversity, in accordance with PPW10 (Paragraph 6.4.11 and Paragraph 6.4.21), Policy GP5 of the NLDP and NCC Wildlife and Development SPG, the proposals include habitat enhancement and long term management measures to achieve gains in biodiversity.
- 7.15 A Technical Report to Inform Habitats Regulation Assessment is submitted as part of this planning application and considers the potential implications of the proposed development on the nearby European Sites. It is concluded that disturbance effects (air emissions, noise, lighting, reduced water quality) can be mitigated by the implementation of construction industry best practice measures and through design and operational procedures of the manufacturing facility. Details of measures to be employed during the construction phase of the development will be provided within the Construction Environmental Management Plan (CEMP). With the implementation of mitigation measures there will be no adverse disturbance effects arising from the project, or in combination with other developments, on the ecological integrity of the Severn Estuary SPA, SAC and Ramsar site and River Usk SAC.
- 7.16 In respect of land contamination, a robust and resilient strategy to deal with potential contamination and instability/subsidence will be in place to ensure the necessary remediation measures and on-site best practice measures will be implemented throughout the construction and operational phases of the development. On this basis, it is considered that the proposed development will not give rise to any unacceptable harm to health because of land contamination, instability, subsidence or any other identified risk to the environment, local amenity or public health and safety and is in accordance with PPW10 and NLDP Policy GP7.
- 7.17 A Heritage Impact Assessment (HIA) has been submitted with the planning application having regard to the guidance published by the Welsh Government and Cadw 'The setting of Historic Assets in Wales' (2017). The HIA concludes that the proposed development will result in no change to the elements of the Gwent Level HCA's setting and no harm to the overall significance of the historic landscape. The proposed development is therefore in compliance with PPW10, TAN24 and NDLP policies SP8, SP9 and CE4.
- 7.18 A Sustainable Development Appraisal has been carried out which considers the proposed development against the well-being objectives set out by the Welsh Government, Newport City Council and Natural Resources Wales. The sustainable development appraisal will assist Newport City Council in their decision-making and their responsibilities under the WFGA.
- 7.19 For the above reasons, it is requested that NCC grants planning permission for the proposed development at the earliest opportunity.