

Our Ref: 25.280

Date: 5th December 2025

Newport Planning
Newport City Council,
Civic Centre,
Newport,
NP20 4UR

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Dear Sir or Madam,

Town and Country Planning Act 1990 (As Amended).
Installation of external building flues and associated works
IP5, Celtic Way, Newport, NP10 8BE
Planning Portal ref. PP-14535602

Asbri Planning is appointed as planning agent to DRAC Consulting and NHS Wales Shared Services Partnership in respect of the above planning application for the proposed installation of external building flues and associated works at IP-5, Celtic Way, Newport, NP10 8BE. As you will be aware, Application Ref: 22/0456 for the change of use of part of the building from B8 to B1 laboratory testing with external structures was approved in October 2023.

The following drawings are submitted, prepared by DRAC Consulting to accompany the application:

Drawing name	Drawing reference
Site Location Plan	A001
Site Plan	DR-1553-E-08
Existing External Elevations	DR-1553-E-07
Proposed External Elevations	DR-1553-E-06

In addition, the supporting documents submitted comprise the following:

Document name (reference where appropriate)	Prepared by
Application Form	Asbri Planning
Planning Letter	Asbri Planning
Green Infrastructure Statement	Ecological Services Ltd

The planning application fee has been calculated based upon installation of plant or machinery and is £667.

Site Description

The application site is located within Imperial Park which comprises offices, modern production units, large manufacturing and warehousing operations. The site is comprised of unit IP5 which includes a large warehouse style building with parking located to the east. The site sits approximately 4.90km to the south west of Newport City Centre and 12km to the north east of Cardiff City Centre. Imperial Park is closely located to the M4 and is approximately 1.61km to the south west of junction 28.

The site includes a car parking area to the east of the building alongside delivery space located to the west. The surrounding units are all industrial/commercial in nature, with a number of different occupiers operating from the remaining units. The site is accessed via Celtic Way for both vehicles and pedestrians. From Celtic Way access onto an internal highway is achieved that runs to the area of parking alongside to loading/unloading areas.

Planning History

A review of Newport City Council's online planning register confirms that the following applications are of relevance to the site:

Reference	Proposal	Decision
24/0611	Proposed partial change of use of building IP5 from B8 storage to B1 laboratory use and ancillary spaces and associated minor external works	Granted With Conditions 28 Nov 2024
24/0390	Partial discharge of conditions 3 (CEMP), 4 (construction phasing and logistics method statement), 5 (landscape and ecological management plan) of 23/1083 proposed installation of a solar array	Approved 02 Aug 2024
23/1083	Proposed installation of a solar array	Granted with Conditions 15 Feb 2024
22/0456	Change of use from class B8 distribution to class B1 (laboratory testing) and B8, external alterations and installation of flammable liquid store	Granted with Conditions 19 Oct 2023
19/0427	Change of use from manufacturing B2 to storage/distribution B8	Granted with Conditions 07 Jun 2019

Proposed Development

The proposal involves installing an internal backup generator within the industrial unit to provide power supply to the laboratory. This is to ensure the stored medication can be maintained at their required temperature in the uncommon event of a power outage. This is a highly significant installation as any interruption to the unit could affect samples and increase downtime for patients. This installation will mitigate the risk of any disruption and ensure laboratory operations remain resilient in the face of unexpected power failures.

The proposal intends to install the internal generator towards the south-western part of the IP-5 building, adjoining the existing loading bay area to the left. The required works include the following:

- Install 2 generator hot air exhaust louvres, which include acoustic baffles to reduce the noise levels of the running generator
- New generator engine exhaust flues (400mm in diameter) which rise above the parapet, with the other end breaking out of the building

The proposal will also include a new escape door from the generator room, as shown on the proposed north elevations, as well as a new concrete towards the kerb.

The generator will be installed within a highly accessible part of the building, being adjacent to the main access road which runs directly south of the unit. This will ensure that construction and maintenance vehicles will have efficient access to the internal generator.

Planning Policy Framework

Planning Policy Wales

PPW Edition 12 was adopted by the Welsh Government in February 2024 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015 and other key legislation. PPW and the National Development Framework (NDF) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

Future Wales: The National Plan 2040

Published on the 28th of February 2021, Future Wales comprises the first development plan of its kind within Wales. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. The National Plan notes that the planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places.

Technical Advice Notes

Technical Advice Notes (TANs) should be taken into account by local planning authorities and should be read alongside PPW. They provide more detailed planning policy guidance on technical disciplines that are broadly covered within PPW.

TAN 11: Noise (1997) provides advice on how the planning system can be used to minimise the adverse impact of noise without 'Planning Guidance (Wales): Planning placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main considerations which local planning authorities should take into account in drawing-up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

Newport Local Development Plan

The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is the Newport Local Development Plan (LDP) and provides the framework for the development and use of land within the County over the plan period.

The following LDP policies are considered relevant in the context of the proposed development for this application:

Policy Reference	Relating to
SP1	Sustainability
GP2	General Amenity
GP7	Environmental Protection and Public Health

SP1 - Sustainability

Proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary.

GP2 – General Amenity

"Development will be permitted where:

- i. There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, odours and air quality;*
- ii. The proposed use will not be detrimental to the character or appearance of the surrounding area"*

GP7 – Environmental Protection and Public Health

"Development will not be permitted which would cause or result in unacceptable harm to health because of air, heat, noise or light pollution, or any other identified risk to environment, local amenity or public health and safety"

Supplementary Planning Guidance

The following SPG's are of relevance to the proposal:

- *Air Quality SPG (February, 2018)*

Planning Appraisal

This application seeks full planning permission for the installation of external building flues and associated works. Below are sub headings which address specific issues with the proposal whilst complying with National and Local Policies.

Principle of Development

The proposal involves installing an internal backup generator towards the west part of the existing IP-5 building. The site is already subject to previous planning approval (22/0456) for the change of use of part of the building from B8 to B1 laboratory testing with external structures in October 2023. This application proposes a minor addition to the existing building, and does not consist of any major scale.

As previously mentioned, the installation of the internal backup generator would ensure the stored medication can be maintained at their required temperature in the uncommon event of a power outage. This is a necessary installation as any interruption to the unit could affect samples and increase downtime for patients. Ultimately, this addition would mitigate the risk of any disruption to the existing laboratory.

To conclude, the proposal involves a minor addition to support an existing use and is therefore acceptable in principle.

Neighbouring Amenity

The unit is located within an established employment area and it is not considered that the proposal would result in the generation of noise over and above what is to be expected within such an area. Given the unit's location within an established employment area and not within close proximity of residential dwellings, it is not considered that the proposals would result in an adverse impact to neighbouring properties, in accordance with Policy GP2 (General Amenity).

Mitigation measures are proposed to minimise the noise impact caused by the generator, through the installation of acoustic baffles for the generator exhaust louvres to reduce noise levels of the running generator. Additionally, the development will not be detrimental to the character or appearance of the surrounding area, given the small scale of the additional infrastructure.

Overall, the generator will not cause any significant adverse effect on local amenity, including in terms of noise, disturbance, odours and air quality, and therefore accords with Policy GP2 (Amenity) of the Newport Council Local Development Plan.

Impact on Biodiversity and the Environment

Planning Policy Wales 12 and Policy 9 of Future Wales states that in all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated. A

With regard to green infrastructure, the subject site only consists an area of 161.88m² within the existing building, and therefore does not include any green space, planting or biodiversity which could be affected. The surrounding industrial estate consists of tarmac car parking, semi-improved grassland verges, and woodlands to the west. The site does not fall within

Conclusion

This letter has been prepared on behalf of DRAC Consulting and NHS Wales Shared Services Partnership to accompany a full planning application in respect of the proposed installation of external building flues and associated works at the IP-5 industrial building, Celtic Way, Newport, NP10 8BE.

The development involves the minor installation of an internal generator within the existing building, to supply power to the laboratory if necessary. The principle of the proposal is considered acceptable and the above planning appraisal has demonstrated that the proposal is in accordance with pertinent national and local planning policy.

I trust that the submitted documents allow the application to be validated and look forward to receiving details of the name of the case officer, application reference number and target determination date. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours sincerely,

Scott Davies

Student Planner