

Land East of Lyte Buildings,
Road C, Wern Industrial Estate,
Rogerstone, Newport,
NP10 9FQ

Change of Use from Sui Generis to B8 Self-
Storage Facility

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Appendix A – National Planning Policies

1. Introduction

Background

- 1.1. This Planning, Design and Access Statement has been prepared in support of a full planning application, submitted on behalf of Blue Self Storage in relation to the following development proposal, located at Land East of Lyte Buildings, Road C, Wern Industrial Estate, Rogerstone, Newport NP10 9FQ:

'Change of Use from Sui Generis to B8 Self-Storage Facility'

Information Submitted in Support of the Application

- 1.2. The following information has been prepared in support of the planning application:

Document	Author
Application Forms	Geraint John Planning
Planning, Design & Access Statement	Geraint John Planning
Plans & Drawings	Lawray Architects
Ecology	Wyndrush Wild
Highways	Apex
Landscaping	TDA

Purpose and Structure of this Statement

- 1.3. This Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals. The Statement also sets out reasoned justification in support of the proposed development. The Statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
 - **Section 3** provides details of the development proposals and design objectives;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** provides details regarding the Design and Access Statement;
 - **Section 6** analyses the key planning considerations arising from the proposed development (considering the planning policy context); and
 - **Section 7** sets out our conclusions.

2. Site and Surroundings

Site Location and Description

- 2.1. The site is located within Wern Industrial Estate, which is located in Rogerstone, and the administrative boundary of Newport. The site comprises a uniform parcel of land, which can be seen below for reference.



Aerial view of the site (approximate site outline in red)

- 2.2. The application site extends to approximately 0.38 ha and is located within the administrative area of Newport City Council.



Site Location and its wider context (approximate site location circled in red)

- 2.3. The site is encompassed by an existing fence, with the primary access point provided along the Northeast industrial estate's unnamed road. Images of the site can be found below for reference:



Image of the Site's North Access



Image of the Site's South Access



Image of the sites Southwestern Boundary

Surroundings

2.4. The site is located directly adjacent to the following use class orders that are located within the industrial estate:

- Freight Movement Ltd (B8);
- Tiny Rebel Warehouse (B8);
- Tiny Rebel (B2);
- EDB UK (B2); and
- Ballet Cymru (D2)

2.5. The site is also situated in proximity to the following transport modes:

- Rogerstone Train Station (0.7 miles – 25 minute walk);
- Chartist Drive Bus Stop (270m – 5 minute walk); and
- The A467 which provides wider access to the M4 and A48.

Planning History

2.6. In assessing the site for development, a planning history search for the site has been undertaken using the planning application search register on the council's website. There is existing planning history for the site itself and the surrounding area, the key planning permissions directly relating to site are included below.

LPA Ref.	Location	Proposal Description	Decision	Decision Date
The Site				
23/0714	Land To North West Of Chartist Way, Rogerstone, Newport, South Wales	PROPOSED B8 COMMERCIAL DEVELOPMENT WITH ASSOCIATED PARKING, ACCESS AND EXTERNAL STORAGE AND SERVICE AREAS	Granted with Conditions	03/05/2024
19/0879	Tiny Rebel Brewery, Road A, Wern Industrial Estate, Newport, NP10 9FQ	CONSTRUCTION OF DISTRIBUTION WAREHOUSE WITH OFFICES AND ANCILLARY ACCOMMODATION AND ASSOCIATED WORKS	Granted with Conditions	11/11/2019
17/1058	Land To South East Of 31 Coverack Road, Newport	CHANGE OF USE TO CONTAINERISED SELF-STORAGE DEPOT	Granted with Conditions	03/05/2018

Planning History Table

17/1058

2.7. The most relevant Planning Application to this proposal, is Planning Application ref. 17/1058 which gained approval to develop a vacant site into a containerised self-storage depot.

2.8. Application ref. 17/1058 gained approval for 104 self-storage units to be erected on site, with the site comprising an overall area of 0.25ha. The relevant information from the Officer's Report has been extracted below for reference.

Principle of Development

- 2.9. The Officer's report considered the location of the proposal, the site's context, and the former use of the site. Despite a predominantly residential use surrounding the site, the proposed unit separation from neighbouring properties was deemed adequate. The report also considered the disused state of the site, that had become a known fly-tipping point, and the former industrial use that that was considered the lawful fall-back. Overall, the Officer's report considered the site acceptable in principle.

Amenity

- 2.10. As stated above, the Officer's report considered the distance between units and neighbouring properties to be adequate, especially due to the proposed planting strip and the retainment of a boundary buffer. Overall, the proposal was considered acceptable in terms of amenity.

Highways

- 2.11. The proposed development was considered to be acceptable from a highway's perspective, subject to the imposition of appropriately worded conditions.

Flooding

- 2.12. The report considered the site's partial placement within flood zone C1. For this reason, the report placed a condition requiring the containers to be set above 7.36 meters above Ordnance Datum. In consideration of this condition and the low vulnerability of the proposed use the development was deemed acceptable in terms of flood risk by the Officer's report.

Land contamination

- 2.13. The Officer's report considered the previous industrial use of the site and based on the Preliminary Contaminated Land Risk Assessment a watching brief condition was imposed. Subject to this condition the report offered no objections in this regard.
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3. Development Proposals

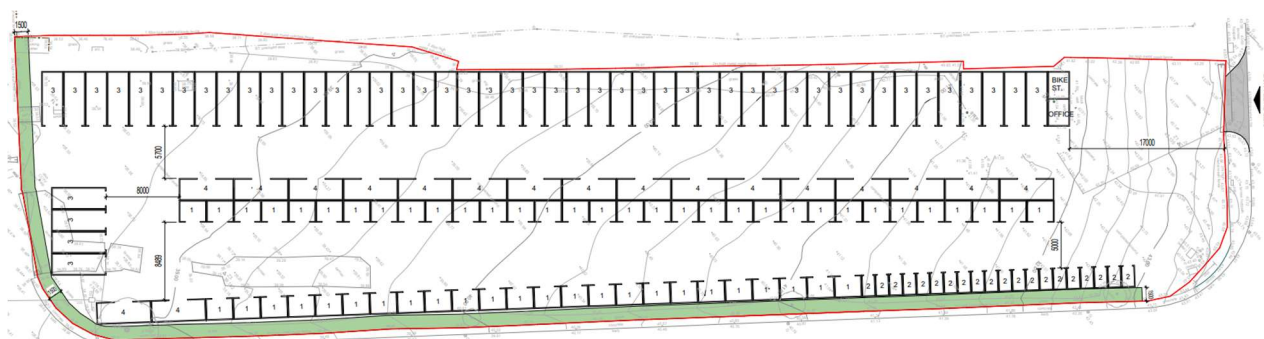
- 3.1. This chapter describes the elements which constitute the proposed development. It should be read in conjunction with the submitted application plans, drawings and other information. As indicated above, this application seeks full planning permission for the proposed development comprising the:

'Change of Use from Sui Generis to B8 Self-Storage Facility'

- 3.2. The proposal comprises the development of the site for the siting of 144 self-storage containers.
- 3.3. The proposed units would vary in size, ranging from 1.5 – 6 metres in length. The table below displays the size and number of units.

Type	Size (Metres)	Number of Units
1	2.4 x 3	56
2	2.4 x 1.5	20
3	2.4 x 6	50
4	2.4 x 6	18
		144

- 3.4. The units have been arranged in lines, with the type 3 units to be provided around the northwest boundary of the site. The remainder of the units are also positioned in lines following the boundaries of the site grouped as per their size respectively.
- 3.5. An extract of the proposed site plan can be found below.



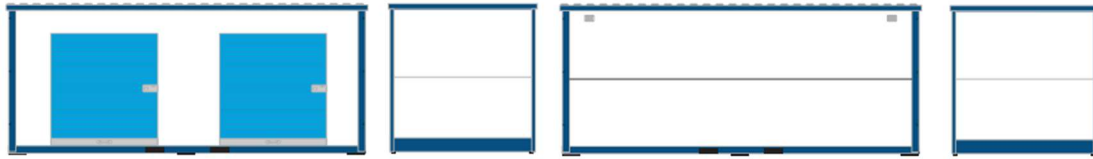
Proposed Site Plan

- 3.6. The containers are manufactured using 1-4mm galvanised welded steel profile with 0.45mm galvanised curtain steel roller shutter doors. The table below provides a description of the material palette / schedule:

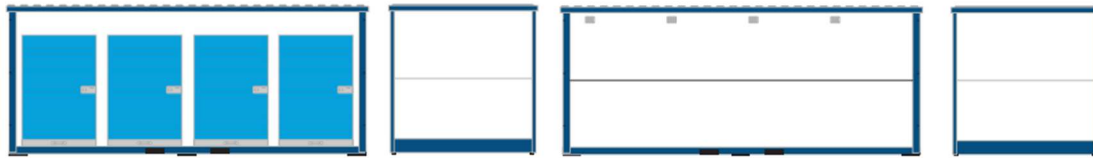
Type	Description
Floor	19 mm sealed marine grade plywood floorboard
Container Colour	RAL 9016 White, High quality powder coating on a polyester basis (façade quality), High corrosion and UV resistance
Colour of the floor frame	RAL 5010 Gentian Blue, High quality powder coating on polyester basis (façade quality). High corrosion and UV resistance
Colour of the roof frame	RAL 5010 Gentian Blue, High quality powder coating on a polyester basis, High corrosion and UV resistance
Colour of the corner columns	RAL 5010 Gentian Blue, High quality powder coating on a polyester basis, High corrosion and UV resistance
Colour of the roller shutter doors	Pantone 2022c light blue, Galvanised and finished with baked Polyester Top Coat

3.7. The elevations of the proposed containers can be seen below for reference.

Type 1 – 2.4m x 3m unit



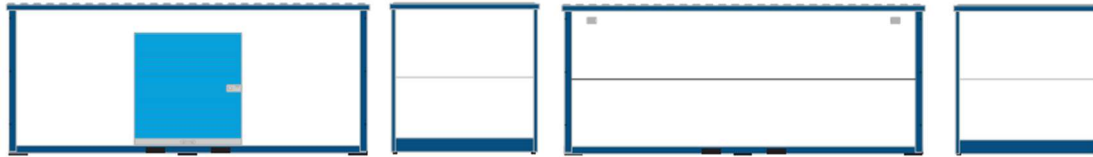
Type 2 – 2.4m x 1.5m unit



Type 3 – 2.4m x 6m unit – door on end



Type 4 – 2.4m x 6m unit – door on side



3.8. The site also features an Office and Bike storage adjacent to the north access which can be seen outlined in the following extract.



4. Planning Policy Context

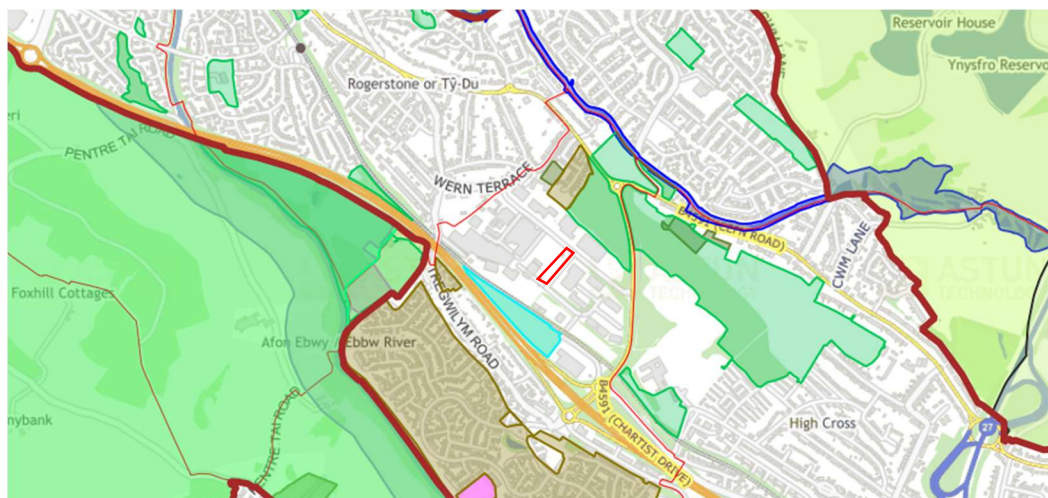
Background

- 4.1. A review of the planning policy context associated with the site and proposed development (at the national and local level) which are of relevance to the determination of the application are outlined and provided within 'Appendix A – National Planning Policies'.
- 4.2. A detailed assessment of how the proposed development accords with these policies is provided in Section 6 (Material Considerations) of this Statement.

Local Planning Policy

- 4.3. The current adopted Development Plan is The Newport City Council Adopted Local Development Plan (LDP). This is presently used for the determination of planning applications and deals with the use and conservation of land and buildings within the County.

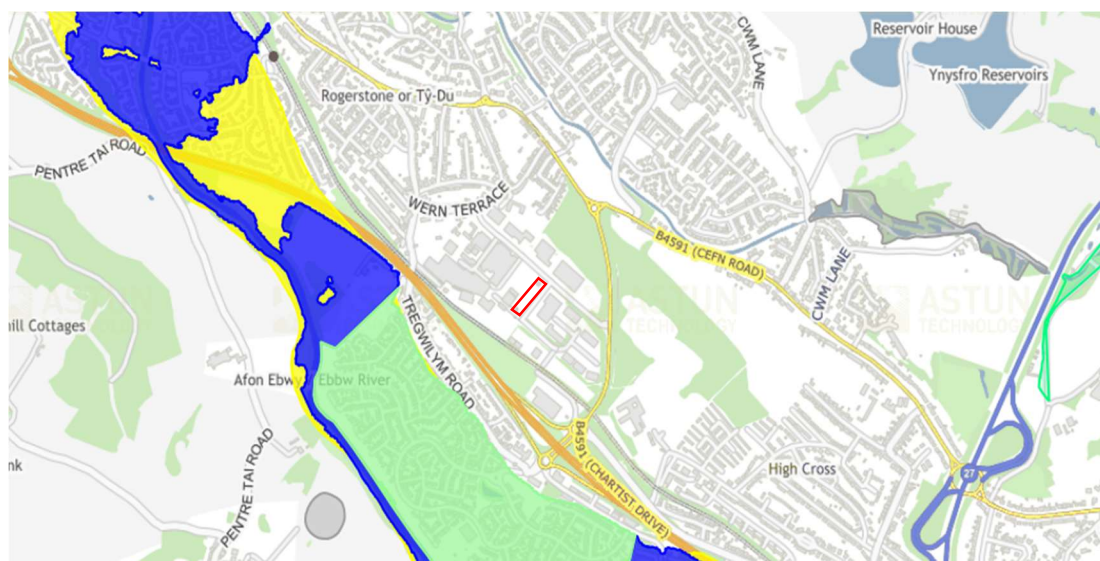
Adopted LDP Proposals Map



Adopted LDP Proposals Map Extract (site shown illustratively in red)

Newport City Council Local Development Plan Proposals Map Key							
	The Site		Allotments		Housing Commitment		Green Wedge
	Education		Countryside		Environmental Space		Mineral Safeguarding
	Employment		Special Landscape Area		Conservation Area		Long Distance Cycle Walkway
	Urban Boundary		Sand and Gravel				

Adopted LDP Constraints Map



Extract from LDP Constraints Map (approximate site location in red)

Newport City Council Local Development Plan Constraints Map Key			
	The Site		TAN 15 Zone C2
	TAN 15 Zone B		TAN 15 Zone C1
	Scheduled Ancient Monument		Local Nature Reserve

4.4. The LDP Proposals and Constraints Maps (as extracted above) confirms that the site is not subject to any planning designations or proposals, and is not subject to any constraints.

4.5. In light of the above and the proposed development, the policies considered to be of greatest relevance are as follows:

- **Policy SP1** – Sustainability;
- **Policy SP17** – Employment Land;
- **Policy SP18** – Urban Regeneration;
- **Policy GP2** – General Amenity;
- **Policy GP4** – Highways and Accessibility; and
- **Policy GP6** – Quality of design

Supplementary Planning Guidance

4.6. The following Supplementary Planning Guidance (SPG) which are of relevance to the proposals have also been taken into consideration:

- Trees, Woodland, Hedgerows, and development sites (2017).
- Parking Standards (2015)

5. Design & Access Analysis

Design

5.1. Design is defined within Planning Policy Wales (PPW 12) section 3.3 as:

'Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.'

5.2. TAN 12 highlights that:

'Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.'

5.3. Moreover, TAN 12 promotes key objectives of good design under the following headings:

- Access
 - Ensuring ease of access for all
- Character
 - Sustaining or enhancing local character
 - Promoting legible development
 - Promoting a successful relationship between public and private space
 - Promoting quality choice and variety
 - Promoting inclusive design
- Community Safety
 - Ensuring attractive, safe public spaces
 - Security through natural surveillance
- Environmental Sustainability
 - Achieving efficient use and protection of natural resources
 - Enhancing biodiversity
 - Designing for change
- Movement
 - Promoting sustainable means of travel

5.4. At a local level, LDP Policy GP 6 (Quality of Design) supplements PPW's overarching goals to create high quality places through placemaking principles. The Policy states the following:

'Good quality design will be sought in all forms of development. the aim is to create a safe, accessible, attractive and convenient environment.'

5.5. The way in which each key objective has been considered and addressed in the design of the scheme is outlined overleaf.

Access

- 5.6. The site benefits from an established access to the northeast, featuring road and pedestrian infrastructure connections to Rogerstone and nearby trunk roads.
- 5.7. In addition, the site itself features appropriate distancing between the storage containers to ensure easy travel flow whilst navigating within the site. These distances range from 5 meters to 8.49 meters allowing cars to easily pass parked vehicles and pedestrians within the site.
- 5.8. Whilst formal parking is not provided for within the site, it is considered that, in light of the low number of movements associated with the use, there are acceptable levels of informal parking opportunities for future users accessing their units. Furthermore, given that the site will feature no permanent staff the lack of formal parking is considered to be appropriate.
- 5.9. In light of the above, it is considered that the proposed development represents an accessible scheme, which has given due consideration to and ensure ease of access for all potential users and abilities.

Character and Context

Layout

- 5.10. The proposal comprises the development of an existing plot, currently utilised for car parking and HGV Storage. The site will be repurposed as a self-storage facility, introducing 144 storage units. The reuse of the site will improve the surrounding context and wider Industrial estate, introducing a formal use for the site.
- 5.11. The proposal comprises an attractive layout which ensures adequate space between the storage units without compromising accessibility. It is also highly legible, utilising its northeastern access to its full extent with long and uninterrupted sightlines throughout the site area.

Scale and Massing

- 5.12. In terms of massing, the development will be minimal in height or scale, featuring no stacked containers. As such, the units will be of a similar scale to the existing redundant structures present on this site and smaller in massing than the HGVs currently utilising the site. Accordingly, the scale, whilst formalised across the site, is comparable to the current use.
- 5.13. Furthermore, the scale and massing is not considered to be unacceptable in light of the site's context. Comprising single story storage units, the proposals will not result in any detrimental impacts on the neighbouring warehouses in this aspect.

Appearance

- 5.14. The development will be built to an exceptionally high quality and will take into consideration the particular characteristics of the surrounding buildings and area.
- 5.15. The appearance and material palette for the development has been designed taking into account the building's location within Wern Industrial Estate, complimenting the surroundings through similar industrial design style.
- 5.16. The scale, appearance and material palette for the development have been designed to complement the local area and provide a high-quality scheme. As such, the appearance and materials of the scheme are considered to be appropriate and in keeping with the character of the surroundings.

Community Safety

- 5.17. Given the nature of the proposals, it is not considered that a self-storage facility would raise any security issues that would adversely affect the surrounding community. Furthermore, it is considered that the removal of the existing arrangement will improve community safety through additional mitigation measures.
- 5.18. In regard to lighting, the site benefits from its prominent position within a large industrial estate; featuring high legibility, and ample street lighting. In addition, the existing boundary fencing provides a physical barrier further dissuading trespassing.
- 5.19. Whilst the existing arrangement is considered adequate, it should be noted that the proposals will further improve security through the introduction of surveillance equipment and security personnel. These will act as further deterrence minimising safety concerns.
- 5.20. Notwithstanding this, the individual units themselves also dissuade from anti-social activity given their advanced locking mechanisms and 'strong-body' design.
- 5.21. Accordingly, it is considered that the proposals appropriately adopt Secured by Design credentials, ensuring an improvement upon the current arrangement present.

Environmental Sustainability

- 5.22. As an overall strategy, the design, layout and orientation of the proposed development seeks to:
- Promote efficient development in a sustainable location;
 - Enhance the sites ecology through significant improvements to green infrastructure provision; and
 - Encourage Active Transport through improved connections and provision of associated facilities.
- 5.23. Paragraph 3.55 of PPW12 outlines that *'in settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles, and any constraints can be overcome.'* As such, the proposal to re-use the existing hardstanding plot is considered to be a sustainable and appropriate form of development.
- 5.24. Moreover, the proposals will feature a number of additional green elements such as additional planting and green roofing. This will see the creation of multiple micro-habitats and the introduction of new Green Infrastructure assets to the site and its ecology.
- 5.25. In summary, the proposed development complies with the Welsh Government's sustainability objectives and national planning policy aims of promoting resource-efficient and climate change resilient settlements.

Movement

- 5.26. In regard to vehicular access, the site benefits from an existing access Street to the northeast. There would be no change from the existing arrangements, and they would remain suitable for the proposals.
- 5.27. The site benefits from streetlighting and pedestrian facilities at the site's access and encompassing the site to the southeast. These routes connect the residential areas to the north of the Industrial Estate and Transit facilities such as Chartist Drive Bus Stop and Rogerstone Train Station.
- Chartist Drive Bus Stop – Regular services to Newport – 4-minute walk from the site access.
 - Rogerstone Train Station – Regular services to Cardiff and nearby towns – 23 minute walk from the site access.

- 5.28. The site is therefore considered to feature appropriate alternative modal choices and sustainably located in regard to movement.

Highways

- 5.29. Given the nature of the proposals and the existing use of the site as a car park / HGV storage it is considered that the re-use of the site as a self-storage facility would result in a net decrease in movements to and from the site – featuring no detrimental impacts in regard to highways accordingly.
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6. Material Considerations

Key Planning Considerations

- 6.1. The key planning considerations arising from the proposed development (considering the nature and form of the proposed development and the planning policy context outlined within the preceding section of the Statement) are as follows:
- Principle of Development;
 - Design and Layout;
 - Highways, Access, and Parking;
 - Ecology;
 - Landscaping;
 - Green Infrastructure; and
 - Other Considerations – Flood Risk and Drainage, Public Rights of Way, and Heritage.
- 6.2. These issues are discussed in further detail below.
-

Principle of Development

- 6.3. Policy SP1 (Sustainability) of the Local Development Plan sets out development should be concentrated within sustainable locations and the following criteria that new development must comply with. Of most relevance to this proposal:
- i) *"The efficient use of land"*
 - ii) *"The reuse of previously developed land [...] in preference to greenfield sites"*
- 6.4. The site is located within the settlement boundary and has historically been used as a car park. As such, the site comprises an area of predominantly hardstanding. The proposal will see the reuse of this area for the placement of 144 storage units.
- 6.5. Overall, it is considered that the proposed development meets the requirements of Policy SP1 (sustainability) through a proposal that features efficient usage of previously developed land.
- 6.6. The location of the development and its surrounding uses is also considered by the proposal. Of relevance to the proposed development, Policy GP 2 (General Amenity) states:
- i) *'There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours, and air quality;'*
 - ii) *'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;'*
- 6.7. Regarding criterion i, the proposed development is not considered to cause any unacceptable amenity impacts due to the nature of the proposal as a storage site. Furthermore, it is considered that the historic use of the site (Car park) would be responsible for higher levels of both noise and air pollution, in comparison to the proposed self-storage facility. Accordingly, the proposal will bring about a betterment in this respect.
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- 6.8. The proposal is also considered to be compliant with criterion ii, given that it falls within a predominantly commercial area (Wern Industrial Estate). The current surrounding uses, such as *Tiny Rebel and EDB UK*, would, by their very nature, include an element of storage of bulks and goods. Furthermore, as stated in section 2, the proposal is also located near to a number of similar B8 uses such as the warehouses to the site's north (Tiny Rebel Warehouse) and south (Freight Movement Ltd).
- 6.9. Overall, it is considered that the industrial B8 use is in-keeping with the local character of industrial uses whilst ensuring no unacceptable impacts to neighbouring amenities
- 6.10. In terms of National Planning Policy, PPW promotes the presumption in favour of sustainable development. The proposed development is considered to be sustainable for the following reasons:
- The proposed development is sited in a location which is suitable and appropriate for the proposals in question. Accordingly, it is considered that the proposed development is sustainably located; and
 - The proposed development is considerate of the surrounding industrial estate and proposes an appropriate land use. It is therefore considered the proposed development is a sustainable use.
- 6.11. The principle of development therefore complies with the aims of LDP Policy SP1 (Sustainability) and the general aspirations of Local and National Policy.

Design and Layout

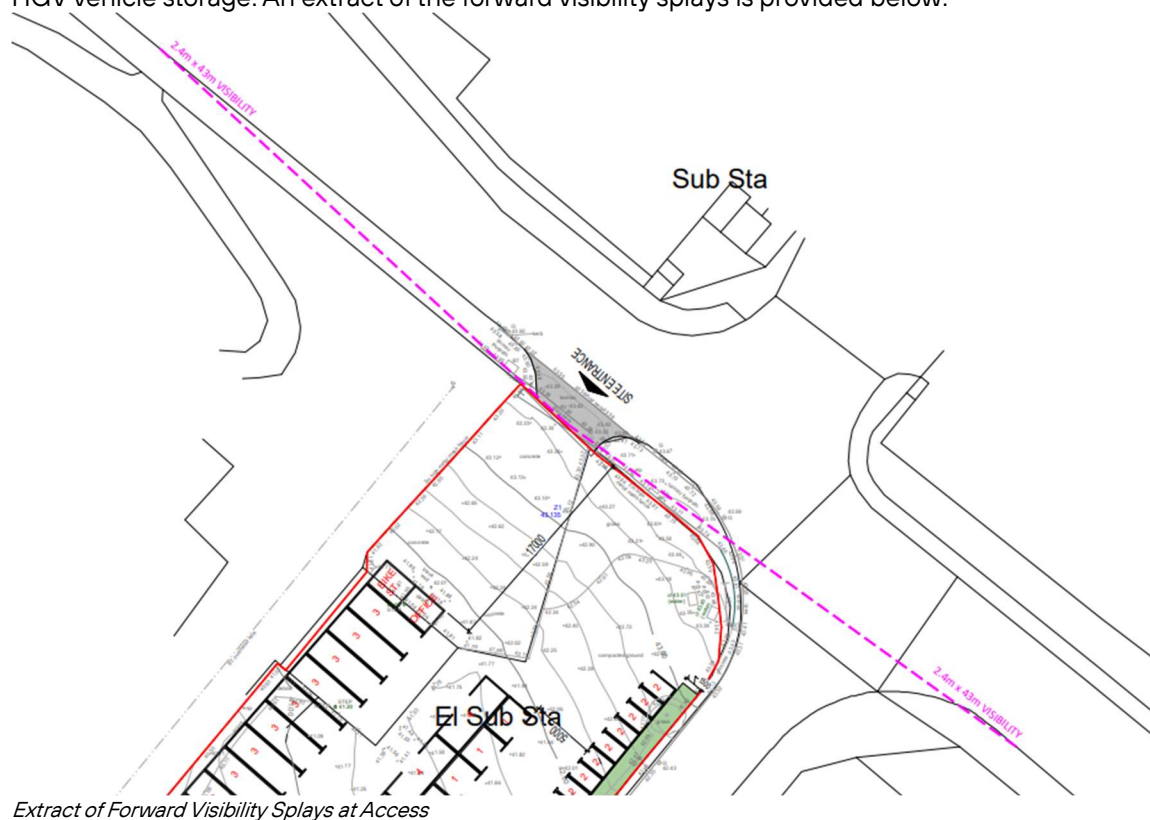
- 6.12. The overarching aim of the Plan is to ensure that sustainable development is achieved. This means ensuring that the types of development that take place are of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces.
- 6.13. Policy GP6 (Quality of Design) of the LDP states that all new development will be required to be of high quality and sustainable design. Of relevance to this proposal the policy states:
- i) *'Context of the site: all development should be sensitive to the unique qualities of the site and respond positively to the character of the area;'*
 - ii) *'Access, Permeability and Layout: all development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution; [...]*
 - iv) *'Scale and Form of development: new development should appropriately reflect the scale of adjacent townscape. care should be taken to avoid over-scaled development;'*
 - v) *'Materials and Detailing: high quality, durable and preferably renewable materials should be used to complement the site context. detailing should be incorporated as an integral part of the design at an early stage;'*
- 6.14. As stated in the section above, the proposal is considered to represent an acceptable form of development, as the character and appearance of the site will reflect that of the surrounding industrial estate. It is therefore considered that the proposal meets criteria i of Policy GP6 (Quality of Design).
- 6.15. In regard to criteria ii, the proposal is sited within an area benefiting from pedestrian footways and close proximity to bus and rail infrastructure – 250 m and 1.5 km away respectively. The nature of the proposal will also result in limited noise pollution and legible layout of the development.
- 6.16. The scale of the development is considered to be minimal in regards to height with the storage units considered to be the equivalent of a single storey. For this reason, the proposal is considered to have no

concerns regarding over-scaling and to be in keeping with the surrounding structures that are a maximum of two-storeys. Moreover, the height of the units will be lower than that of the lorries stored on site, resulting in a betterment accordingly. Overall, the proposal is considered to meet criteria iv.

- 6.17. The proposed containers will be made of the highest grade and quality steel, SPA-H and SPA-C, and as such are durable and weather resistant. In the event of any decommissioning of the site, the containers can, and will be, repurposes elsewhere, however it should be noted that the proposed materials are recyclable, and any future decommissioning will result in any environmental impacts. Overall, it is considered that the proposal is considered to meet criteria v.
- 6.18. Given that the proposed development seeks to allow for a self-storage facility via the erection of 144 container units within the site, it is considered that the development would be in-keeping with the character and appearance of the surroundings.
- 6.19. In light of the above, it is considered that the proposal is acceptable in terms of policy GP6 (Quality of Design), regarding criterions i, ii, iv, and v.

Highways, Access, and Parking

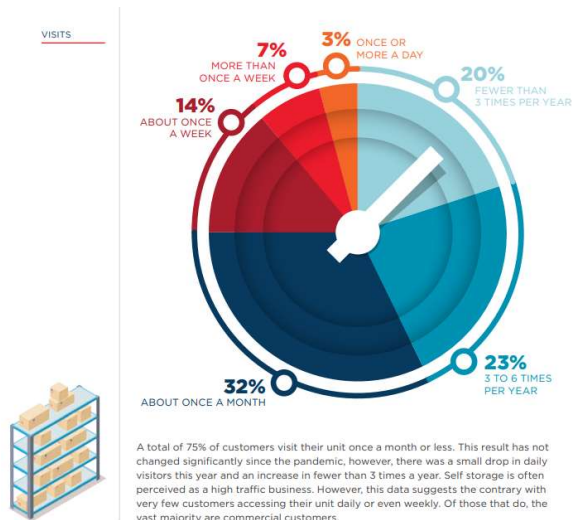
- 6.20. Access to the site is provided from road C that serves Wern Industrial Estate. The road benefits from street lighting and footway, providing pedestrian access within / across the industrial estate.
- 6.21. With regards to the proposed site entrance to the northeast of the site, Apex produced mapping of the existing access and visibility splays, which evidences that the access achieves 2.4 x 43 meter visibility splays. This existing splay is more than appropriate for the proposed use, currently being utilised as the primary access for HGV vehicle storage. An extract of the forward visibility splays is provided below:



- 6.22. Furthermore, given the location of the site within an established industrial estate, the proposals benefit from appropriate road infrastructure in the surrounds designed for use by HGVs and higher levels of traffic. In light of this, and the above, it is considered that the roads are exceedingly appropriate to service the proposed use and, accordingly, the proposals are acceptable in regard to highways.
- 6.23. In addition, the site is also accessible to a range of alternative modalities. The site is located in proximity to Rogerstone Train Station (Approximately 1.05 km), which provides access to Cardiff and Newport. Similarly, bus stops can be found at respectively 200m West and 300m north of the site. In this way, the site is considered to be suitably sited to sustainable transportation hubs also.
- 6.24. It should be noted that the proposed development would not create any buildings with floor space and so the proposals would be difficult to equate a quantum of parking. The layout of the site would instead allow informal car parking adjacent to units for short term, convenient access.
- 6.25. In light of this, the proposals feature adequate distances for cars between the units, and a one-way system, to ensure that a free flow of users can be achieved. This has been further evidenced in the Swept Path analysis that has been undertaken by Apex illustrating that this can be achieved within the site as proposed – as shown below:



- 6.26. With regard to traffic, the 2022 Self Storage Association UK's Industry Report outlines that these type of proposals feature minimal impact upon traffic generation. Using the data and assuming that all units on the site are occupied, it is calculated that the proposals would provide for an average of 10.5 visits a day (see following extract from the report):



Trip Generation extract from the 2022 Self Storage Association UK's Industry Report

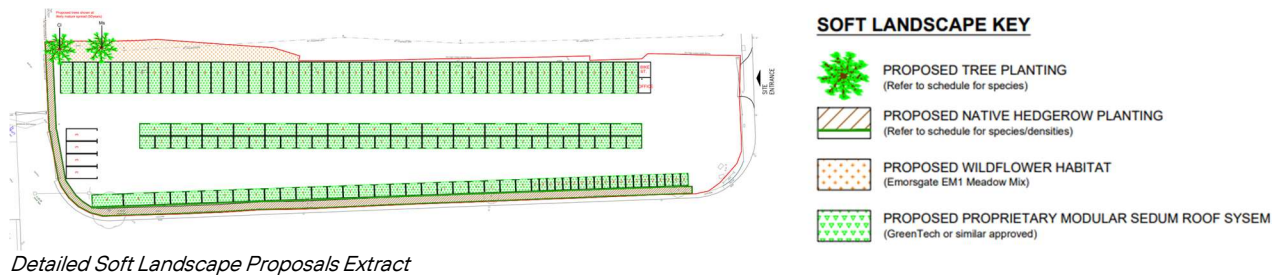
- 6.27. As such, the trip generation as part of the proposals is likely to be negligible. Notwithstanding this, the associated traffic generation of the current site use should be considered. Given the site's use as HGV storage / car parking, it is contended that the proposals would see a net decrease in traffic generation.

Ecology

- 6.28. A Preliminary Protected Species Assessment has been undertaken by Wyndrush Wild to establish the current ecological status of the site, to inform any mitigatory measures. As demonstrated by the Proposed Site Layout, areas for Green Infrastructure have been provided along the site boundaries and frontage, to secure biodiversity benefits.
- 6.29. The report concludes that there is no evidence of current or historic use of bats at the site, this was particularly due to the building featuring little to no roosting opportunities, such as crack or crevices. An extract from the report is below:
- 'The bat roost potential of the structure surveyed is considered 'negligible'. As such, bats do not appear to form a constraint to the development of the site'.*
- 6.30. The report goes on further to state the following in regard to minimisation measures:
- 'Any lighting scheme should adopt a sympathetic regime to avoid light spill. In particular, any security lighting should be directional and fitted with sensors and timers to ensure light is only created when required and is of limited extent and duration'*
- 6.31. These measures will be complied with in full during the development process, and it is accepted that a suitably worded condition could be imposed on any planning permission requesting details of a full lighting scheme.

Landscaping

- 6.32. The proposal incorporates planting where possible throughout the development, comprising additional tree and hedgerow planting, and the introduction of wildflower habitat and green-roofs. As there are limited (if any) existing GI features on the site itself, the landscaping scheme will provide a significant betterment in terms of contributing towards the GI network and placemaking of the area.
- 6.33. For ease of reference, an extract of the soft landscape proposals can be seen below – illustrating the location and extent of these measures.



- 6.34. In addition, the Landscape Specification and Management Plan sets out how the proposed works would commence and the long term maintenance that these ecological features would be subject to. Accordingly, it is considered that the proposals comprise an acceptable landscaping scheme that ensures ecological benefits the foreseeable future.

Green Infrastructure

- 6.35. In accordance with the updated Chapter 6 of PPW 12, this section sets out how the development has considered green infrastructure as part of the proposals. Specifically, this section confirms how the proposal has followed the Step-Wise Approach set out in PPW 12.
- 6.36. The first priority, as set out in the Step-Wise Approach is to 'avoid damage' to biodiversity in any respect, as well as avoiding development in statutory designated sites.
- 6.37. It is considered that the site's existing biodiversity is significantly limited, comprising primarily of young trees along the southeastern boundary of the site. Accordingly, and as can be seen in the above soft landscape proposals, the units have been sited away from the boundary to ensure that these assets will not be disturbed.
- 6.38. Accordingly, the proposal meets Step 1 of the Step-Wise Approach in avoiding the loss of any biodiversity habitats / species within or adjacent to the site. As a result, there is no requirement to consider the other steps within the Approach (e.g. mitigation / minimise etc.) given that there will be total avoidance.
- 6.39. In terms of enhancement, it is considered that the remaining soft landscape proposals, notably the additional tree planting and wildflower provision, will ensure that the site achieves an overall ecological net gain.
- 6.40. Accordingly, it can be concluded that the scheme will result in a net gain in biodiversity, in accordance with Chapter 6 of PPW 12.

Other Considerations

Flood Risk and Drainage

6.41. A search of Natural Resource Wales Flood Risk Map shows the site is not within a flood zone. An extract of NRW's Flood Map for Planning can be found below for reference.



Extract of NRW Flood Risk for Planning Map (Approximate Site Area outlined in red)

Key – Flood Risk			
Rivers and Sea		Surface Water & Small Watercourses	
	Flood Zone 3		Flood Zone 3
	Flood Zone 2		Flood Zone 2

Public Rights of Way

6.42. In terms of Public Rights of Way, a review of the Public Rights of Way Map demonstrates that the site is not constrained by any PRoW. An extract of the PRoW map can be found overleaf for reference.

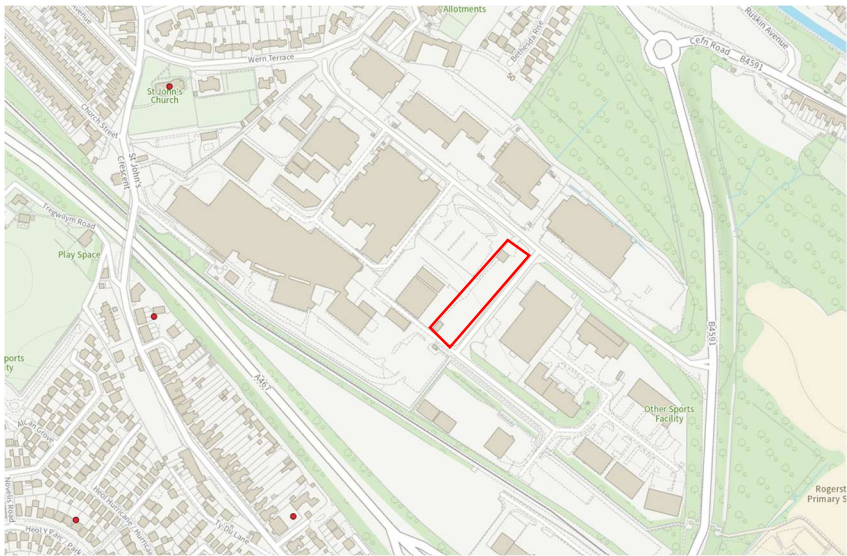


Newport City Council Public Rights of way Map Extract (approximate site area outlined in red)

Key			
	Restricted Byway		Footpath

Heritage

6.43. A search of the below Historic Wales Map shows the site is not constrained by any heritage features.



Historic Wales Map (Approximate site area outlined in red)

Key	
	NMRW(RCAHMW)
	HER (Welsh Archaeological Trusts)

7. Summary and Conclusions

Summary

- 7.1. This Planning Statement outlines the context within which the full application is made, provides a detailed examination of the main planning considerations raised by the proposals, together with a reasoned justification in support of the proposed development.
- 7.2. The proposed development seeks full planning permission for the development of the site into a self-storage facility, proposed to house 144 storage units.
- 7.3. The proposal is considered to be policy compliant and both appropriate and acceptable:
- The site is located within an established commercial area situated within an industrial estate;
 - The development proposes employment opportunities within an established industrial estate;;
 - The site is located on a previously developed land, making the best and most-efficient use of under-utilised brownfield land;
 - The proposed development will achieve a biodiversity net gain, through the incorporation of appropriate green infrastructure assets into the scheme;
 - The proposed development will not have a material impact on traffic or the highway network;
 - The proposed design of the proposal has considered the surrounding context and, as such, is considered to be appropriate;
 - The proposed development will not have a material impact on the amenity of neighbouring occupiers; and
 - The proposed development is not constrained in any respect, including flood risk, heritage etc.
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Conclusion

- 7.4. Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme.
- 7.5. Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the full application be approved.
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GJP.

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