

WENTLOOGE COMMUNITY COUNCIL

Peterstone Village Hall

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Date: 12/08/26

Formal Objection to Planning Application 26/0350 Site; Sluice Farm Broadstreet Common Peterstone
Wentlooge Cardiff CF3 2TN Proposal: retrospective change of use of a livery yard and associated buildings to an inert material recovery facility, including an engineering and fabrication unit

Dear Planning Officer,

Wentlooge Community Council wishes to formally object to Planning Application 26/0350.

The Council considers that this retrospective application seeks to legitimise the industrialisation of a rural agricultural holding within one of the most environmentally, historically and archaeologically significant landscapes in Wales. Rather than representing genuine agricultural diversification, the proposal would establish a substantial industrial waste management and fabrication operation in open countryside, fundamentally changing the character of the site and its surroundings.

The existing unauthorised development has already resulted in significant adverse impacts on neighbouring residents, the surrounding countryside and the wider Wentlooge Levels. The proposal would intensify those impacts whilst introducing a permanent industrial use into an area valued for its agricultural landscape, wildlife, historic importance and quiet rural character.

The Council respectfully requests that planning permission be refused for the following reasons.

1. The Development is Unsuitable for this Rural Location

This proposal is not a genuine agricultural diversification project. The scale and nature of the operation is that of an industrial waste management and engineering and fabrication facility.

Activities include:

- Waste transfer and recovery;
- Crushing and screening of materials;
- Waste storage;
- Engineering and fabrication;
- Heavy industrial plant;
- Skip wagons and roll-on/roll-off containers;
- Road sweepers;
- Tankers and commercial vehicles;
- Frequent Heavy Goods Vehicle (HGV) movements.

These are industrial activities that would normally be expected within an established employment or industrial estate rather than a rural farm holding.

The proposal would fundamentally change the character of the site from agricultural to industrial and there has been no convincing evidence provided that this type of development cannot be accommodated in a more appropriate location.

2. Existing Unauthorised Development has Already Caused Harm

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The application seeks retrospective permission for development that has already taken place.

Substantial operational changes have already occurred including:

- Construction of bunds;
- Engineering and fabrication works;
- Industrial buildings;
- Installation of processing plant;
- Waste handling activities;
- Material changes to the appearance of the site.

The planning system should not be used to legitimise unauthorised development where clear planning harm has already occurred.

The existing operation has already caused significant harm to neighbouring homes and nearby residential properties through the loss of residential amenity and the peaceful enjoyment of their homes.

Residents have experienced:

- Industrial noise;
- Dust and airborne particulate matter;
- Odours associated with waste handling;
- Increased HGV movements;
- Noise from heavy plant;
- Noise from road sweepers;
- Noise from reversing alarms;
- Noise from skip wagons;
- Noise from metal skip bins;
- Noise from pick-up trucks tipping waste;
- Light pollution;
- Visual intrusion;
- Increased traffic;
- Parking pressures;
- Concerns regarding air quality;
- Concerns regarding private borehole water quality.

These impacts are already occurring before the proposed development has been fully established.

3. Unacceptable Impact on Residential Amenity

The nearest residential properties are approximately 25 metres from operational areas.

This is an exceptionally small separation distance for an industrial waste management facility.

The proposal would expose neighbouring residents to continual disturbance from:

- HGV movements;
- Road sweepers;

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- Skip wagons;
- Crushing and screening plant;
- Running machinery;
- Engineering and fabrication activities;
- Loading and unloading operations;
- Reversing alarms;
- Waste tipping;
- External lighting causing light pollution.

Residents would also experience:

- Dust and airborne particulates;
- Odours from waste storage;
- Increased light pollution;
- Loss of outlook and privacy;
- Significant visual intrusion
- A substantial loss of the peaceful enjoyment of their homes.

The submitted noise assessment itself accepts that operational noise cannot be fully assessed until the site is operational and that further mitigation may be required later. This leaves nearby residents exposed to unacceptable uncertainty.

4. Neighbour Consultation

The Council is concerned that immediate neighbouring properties have not received statutory neighbour notification, despite being those most directly affected by the proposal.

Given the scale of the operation and the significant effects already experienced by local residents, the Council requests that the Local Planning Authority confirms that all statutory consultation requirements have been fully complied with before any decision is made.

5. Harm to the Rural Landscape

The proposal has fundamentally altered the appearance of the site.

The existing unauthorised buildings, together with the proposed additional buildings and engineering and fabrication works, create the appearance of a commercial industrial estate rather than a traditional agricultural holding.

The cumulative effect of:

- Industrial buildings;
- Engineering bunds;
- Extensive hardstanding;
- Waste stockpiles;
- Heavy machinery;
- Skip containers;
- External lighting;
- Industrial vehicles;

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- Security infrastructure;

has transformed the site into one that is visually industrial.

The development is visually intrusive within the open landscape of the Wentlooge Levels and significantly harms the character of this Special Landscape Area.

The Council questions whether the proposed buildings genuinely reflect traditional agricultural buildings or merely seek to disguise an industrial operation.

6. Ecology, Wildlife and Protected Landscapes

The ecological importance of this location cannot be overstated.

The site is surrounded by the Gwent Levels Site of Special Scientific Interest and lies within the influence of the internationally important:

- Severn Estuary SAC;
- Severn Estuary SPA;
- Ramsar Site.

The site also affects:

- Wentlooge Levels Grazing Marsh;
- South Wales B-Lines;
- Saltmarsh Priority Habitat.

The adjoining reens provide valuable wildlife corridors.

Records identify numerous protected and notable species within the surrounding area including:

- Water vole;
- Otter;
- Hazel dormouse;
- Badger;
- Hedgehog;
- Stoat;
- Weasel;
- Hare;
- Common shrew;
- Grey squirrel;
- Reptiles;
- Amphibians.

The reens bordering the site provide excellent habitat for amphibians and reptiles and it is highly likely these species utilise the surrounding land.

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The Council is also concerned that additional lighting already installed at the site contributes to light pollution affecting nocturnal wildlife and creating distraction for motorists using surrounding rural roads.

The ecological assessment accepts that there is insufficient information regarding vibration impacts on wildlife, yet concludes impacts are unlikely. The Council considers this conclusion to be unsupported.

7. Water Environment and Flood Risk

The proposal presents significant risks to the surrounding water environment.

Activities involving road sweepers, washing of materials and waste handling have the potential to introduce pollutants into adjacent reens that ultimately discharge towards the Severn Estuary.

The Council remains concerned about:

- Pollution entering adjacent reens;
- Groundwater contamination;
- Potential impacts on private borehole water supplies;
- Surface water runoff;
- Long-term water quality;
- Flood risk;
- The effect of previous unauthorised engineering works on drainage patterns.

The Sustainable Drainage Approval Body has also indicated that a drainage approval application is likely to be required.

8. Highway Safety

The surrounding road network consists of narrow rural lanes that are already in significantly poor condition.

The proposal would significantly increase:

- Heavy Goods Vehicles;
- Skip wagons;
- Road sweepers;
- Pick-up trucks;
- Staff vehicles.

The application indicates parking for approximately:

- 40 staff;
- 15 HGVs;
- Additional commercial vehicles.

No convincing evidence has been provided that local roads can safely accommodate this level of traffic.

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The Council has also seen no clear traffic management plan or proposals to address:

- Road deterioration;
- Highway maintenance;
- Protection for walkers;
- Cyclists;
- Horse riders;
- Agricultural traffic;
- Other vulnerable road users.

The proposal will inevitably increase congestion, carbon emissions, highway danger and further deterioration of local roads.

9. Historic Landscape and Archaeology

The application site lies within one of the most important historic landscapes in Wales.

It is situated within:

- The Archaeologically Sensitive Area of the Gwent Levels;
- The Registered Historic Landscape of Outstanding Historic Interest;
- Historic Landscape Character Area HLCA017 (Peterstone).

The surrounding landscape preserves evidence of Roman land reclamation and historic water management.

Ground disturbance associated with buildings, bunds, foundations and engineering works has the potential to permanently destroy archaeological remains that can never be replaced once lost.

The Council strongly supports the recommendation that Cadw should be consulted before any planning decision is made.

10. Future Expansion

The applicant family owns approximately 40 acres of adjoining land surrounding the application site.

The Council is concerned that only the immediate application site has been assessed.

There is no explanation as to whether adjoining land could be used for future expansion or whether mitigation measures could be delivered outside the application boundary.

This raises uncertainty regarding the long-term scale of the operation.

11. Environmental Permitting

The Council notes that Natural Resources Wales is currently considering an Environmental Permit application relating to the site.

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Whilst environmental permitting and planning are separate processes, the outstanding permit application reinforces concerns regarding pollution control, operational impacts and environmental protection.

Planning permission should not be seen as overriding the need to demonstrate that these issues can be satisfactorily addressed.

Conclusion

Wentlooge Community Council believes that this proposal represents the wrong development in the wrong location.

The existing unauthorised development has already demonstrated the significant impacts an industrial waste management facility can have upon neighbouring residents and the wider rural environment. Local people have already experienced increased noise, dust, odours, light pollution, traffic and the loss of the peaceful enjoyment of their homes. The proposal would intensify these impacts whilst permanently changing the character of the area from an agricultural landscape into an industrial waste management site.

The Council is also deeply concerned about the effects on the surrounding landscape, wildlife, protected habitats, archaeology, water quality, highway safety, public health and the potential for future expansion beyond the current application site. The apparent failure to notify immediate neighbouring properties is an additional concern that should be addressed before any determination is made.

Taken together, these impacts clearly outweigh any perceived benefits of the proposal. Wentlooge Community Council therefore respectfully requests that Newport City Council refuses Planning Application 26/0350.

In reaching its decision, the Council asks the Local Planning Authority to have particular regard to the objectives and requirements of:

- Newport Local Development Plan (Policies SP3, SP5, SP7, SP8, GP2, GP5, GP6, GP7 and CE6);
- Planning Policy Wales (Edition 12);
- Future Wales;
- Technical Advice Note 15 (Development and Flood Risk);
- Technical Advice Note 24 (The Historic Environment);
- Environment (Wales) Act 2016;
- Wildlife and Countryside Act 1981.

Yours faithfully

Nikki Malpas

Clerk to Wentlooge Community Council
On behalf of Wentlooge Community Council