

Our Ref: 26.169
Date: 17th June 2026

Planning and Economic Regeneration,
Newport City Council,
Civic Centre,
Newport,
NP20 4UR

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Mulberry Drive
Cardiff Gate Business Park
Cardiff
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Dear Sir or Madam,

Town and Country Planning Act 1990 (As Amended).
Installation of external building extract ducts, air intake/extract louvres, condenser units and enclosures and associated works
IP5 TRAMS Controlled Temperature Storage Facility, Celtic Way, Newport, NP10 8BE
Planning Portal ref. PP-15008210

Asbri Planning is appointed as planning agent to NHS Wales Shared Services Partnership in respect of the above planning application for the proposed installation of external building extract ducts, air intake/extract louvres, condenser units and enclosures and associated works at IP-5, Celtic Way, Newport, NP10 8BE. As you will be aware, Application Ref: 24/0611 for the proposed partial change of use of building IP5 from B8 storage to B1 laboratory use and ancillary spaces and associated minor external works, known as the TRAMS (Transforming Access to Medicines) project, was approved on the 13th February 2025 (Phase 2 of the IP5 development). The approved plans for this application have also been submitted for reference.

The following drawings are submitted, prepared by Angstrom Technology to accompany the application:

Drawing name	Drawing reference
Site Location Plan	
IP5 External Elevations Existing	23089-A-0121-P1
IP5 External Elevations Proposed Amendments	23089-A-0120 P10
Overall Layout of TRAMS SE Hub	25025-A-0103 P6
IP5 Phase 2 Approved Elevations (submitted with app ref. 24/0611)	23089-A-0120-P6

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	Asbri Planning

The planning application fee has been calculated based upon the total site area, equating to £387 (£296 plus the planning portal admin fee of £91).

Site Description

The site comprises 3 red line boundaries along the northern, southern and eastern external elevations of the IP5 building within Imperial Park. The total area of each boundary can be seen below (combined area of 102m²):

- Northern Elevation Boundary = 63m²

- Southern Elevation Boundary = 27m²
- Eastern Elevation Boundary = 12m²

Imperial Park is a large industrial/business park located approx. 4.90km southwest of Newport, comprising offices, modern production units, large manufacturing and warehousing operations. The site relates to the eastern section of the IP5 unit which includes a large warehouse style building with parking located to the east. Imperial Park is closely located to the M4 and is approximately 1.61km to the southwest of junction 28.

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
25/1067	Installation of external building flues and associated works	Awaiting Decision Submitted 10 Dec 2025
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

TRAMS – Background

As set out in Application Ref: 24/0611, TRAMS is an NHS Wales Programme which aims, amongst other things, to develop improved facilities for medicines preparation for the NHS in Wales. In South East Wales this was rendered urgent by the closure of the legacy Radiopharmacy Unit at University Hospital Wales in October 2023, following a regulatory inspection.

Currently all patients in South and West Wales are being supplied with injections to enable them to be scanned by a single unit in Swansea, with considerable disruption and delay to service at 12 major cancer centres and hospitals as a result. If this unit were to suffer an interruption to service the NHS would be unable to scan patients with cancer indications at all.

It is therefore urgent to open the new medicine preparation facility for South East Wales as soon as possible, and any delay increases risk to life amongst patients. The currently increased demand for cancer treatment is also generating an urgent patient need for increase in supply of medicine hence this project is a very high priority for both Welsh Government and the Health Boards and Trusts that make up NHS Wales.

The TRAMS facility will manufacture many thousands of patient doses of medicine per year, focussing on intravenous and injectable medicines with short shelf lives that must be reconstituted in clean room conditions, typically between 1 and 90 days before being injected into patients. This activity was traditionally done in hospital pharmacy units, but modern manufacturing techniques and increased regulatory requirements mean that it is now beneficial to regionalise this service from a specialist facility. A proportion of this work is currently outsourced, but bringing it back under NHS control will improve quality and consistency of the medicine provision, as well as providing an economic benefit to the public purse.

The majority of the doses will support patients with cancer, but also a range of other conditions and post-surgical needs. The investment will also secure highly skilled employment, insourcing work and economic activity from existing outsourced commercial suppliers in England to the public sector in Wales.

The medicines manufactured will include amongst others:

- Intravenous Nutrition bags for patients permanently or temporarily unable to feed normally;
- Wide range of injectable medicines in ready to use format;
- Cytotoxic cancer medicines;
- Radioactive injectables for therapy and to support patient scanning; and
- Controlled Drugs (eg such as Morphine).

The Radiopharmacy layout is separated from the other facilities, and radioactive product will only be handled in the suite of specially designed rooms of around 500 square metres in the south east corner of the building. There is a separate entrance and no radioactive product will go to any other areas.

The proposals subject to this planning application

In terms of this planning application, a controlled temperature storage facility is a critical requirement for the TRAMS SE Hub, enabling NWSSP to maintain the quality, safety, and stability of temperature-sensitive medicines and starting materials throughout manufacturing and distribution. Many products that will be handled by NWSSP are highly susceptible to temperature variation. Validated, monitored storage ensures these items remain within their licensed conditions, protecting patient safety and supply continuity across NHS Wales.

This supports a seamless quality assurance chain and reduces operational risk by preventing temperature excursions, minimising waste, and ensuring that all products remain within their licensed storage conditions. It also ensures NWSSP can demonstrate full compliance with Good Manufacturing Practice (GMP) and MHRA expectations, which require controlled, continuously monitored, and fully traceable storage environments. Without this infrastructure, the organisation faces risks such as batch failures, product recalls, regulatory non-compliance, and significant financial loss; particularly for high-value or specialist medicines.

Good Manufacturing Practice (GMP) and Medicines and Healthcare products Regulatory Agency (MHRA) requirements place explicit obligations on manufacturers and NHS-based production units to demonstrate that storage conditions are controlled, continuously monitored, and fully traceable. Failure to meet these standards can lead to significant regulatory and operational consequences, including non-compliance findings, batch rejection, product recalls, suspension of manufacturing activities, and reputational harm to NWSSP and NHS Wales. For high-value or specialist medicines, the financial impact of a single temperature-related failure can run into hundreds of thousands of pounds, making robust storage infrastructure a direct value-for-money investment. In addition to temperature control, regulatory expectations also require clearly segregated quarantine and dispatch areas, with restricted access to ensure that quarantined items cannot be dispatched or transacted until formally released.

Climate change further increases the need for resilient, controlled temperature facilities. Rising ambient temperatures and more frequent heatwaves heighten the risk of environmental excursions in areas not designed for modern climate resilience. Incorporating robust controlled temperature storage now future-proofs NWSSP operations, ensuring continuity of supply and regulatory compliance as environmental pressures intensify.

Investing in this infrastructure provides long-term operational stability, reduces the likelihood of costly product losses, and ensures NWSSP can continue to meet its statutory and regulatory obligations. It provides safeguarding of high-value stock, reduction in waste, assists with uninterrupted service delivery, and ensures that the TRAMS SE Hub remains compliant, resilient, and fit for purpose for the future needs of NHS Wales.

Proposed Development

The proposal involves the installation of external building extract ducts, air intake/extract louvres and condenser units and enclosures along the northern, southern and eastern elevations of the TRAMS Controlled Temperature Storage Facility towards the eastern section of the IP5 building. The proposed additions have been clouded in red on the proposed elevations (drg no. 23089-A-0120 P10).

2 new condenser enclosures are proposed, one along the northern elevations (13.5m²) and one along the southern elevations (27m²) beside the existing condenser enclosure. On the eastern elevations, 4 no. extract ducts/air vent stacks will be installed approx. 7.6m above ground level, which will extract air from the isolator rooms within the building. In addition, 2 no. air louvres will be installed on the eastern elevations to supply and extract air to and from the aseptic suites and air compressor, and 2 smaller air intake/extract louvres will be installed on the northern elevations.

The site benefits from previous planning approval 24/0611, which shows the initial plans to install the associated ancillary infrastructure required for the controlled storage facility included within this application. The proposed additions can be seen within the external elevations submitted within the approved application (drg ref. 23089-A-0120-P6). The radiopharmacy intake louver and no. 4 extract ducts in figure 1 have already been installed on the building, although the location of these additions is slightly different to those on the approved plans.

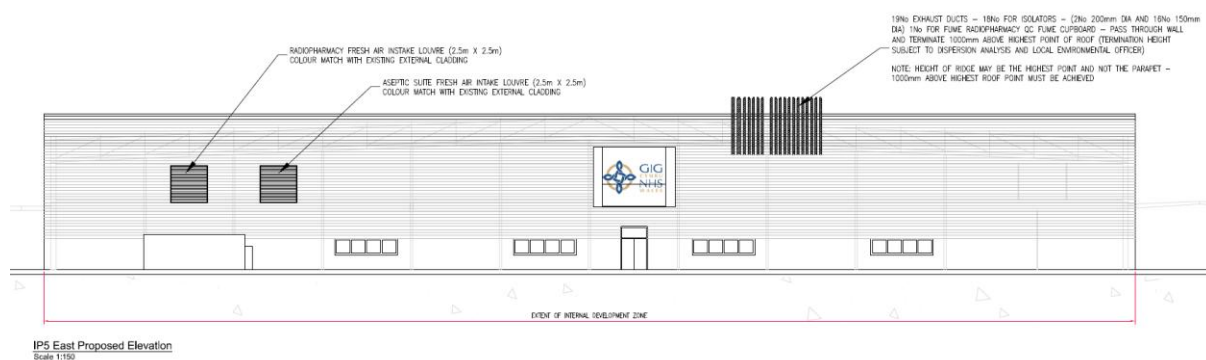


Figure 1: IP5 Approved Eastern Elevations (23089-A-0120-P6)

Figures 2 and 3 below show the existing location of these additions, which have already been installed on the eastern elevations of the building.

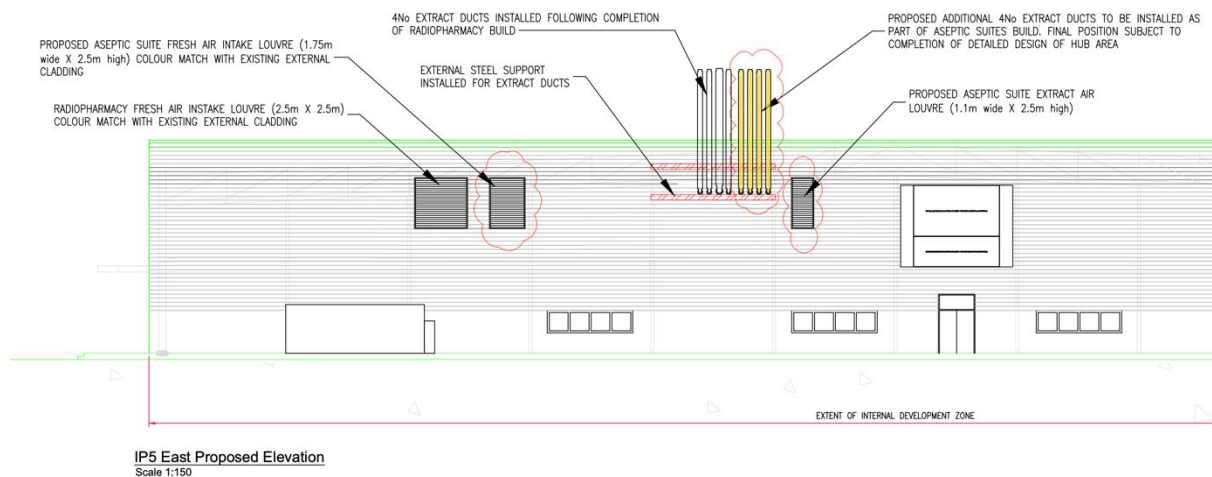


Figure 2: IP5 Proposed Eastern External Elevations (23089-A-0120 P10)

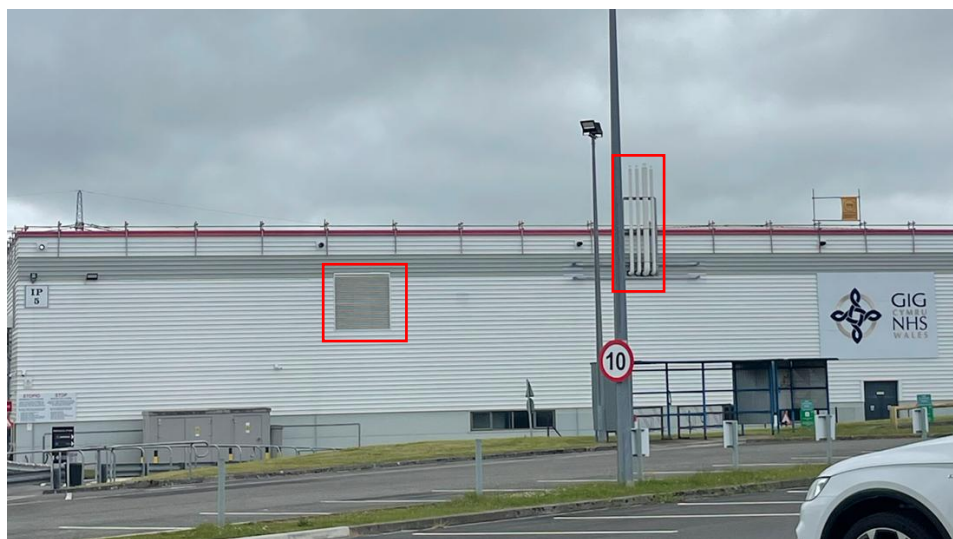


Figure 3: Site Photograph of Existing IP5 Eastern Elevations

It was also confirmed that the radiopharmacy condenser unit on the southern elevations has also been installed beside where the proposed condenser will be located (see figures 4 and 5).

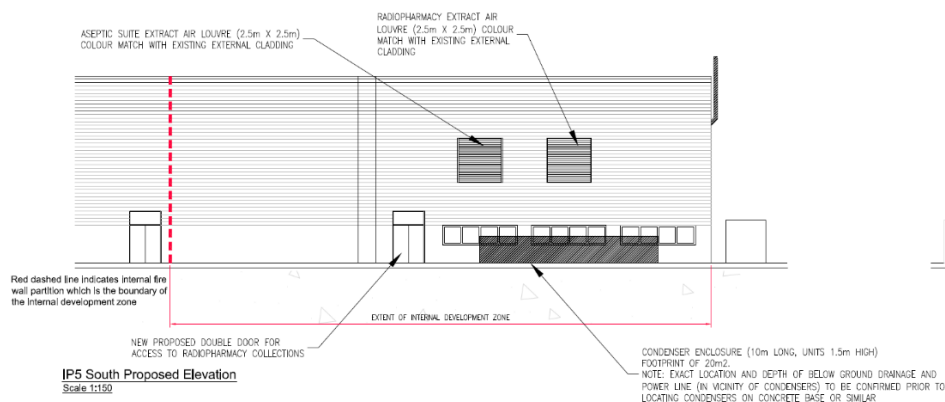


Figure 4: IP5 Approved Southern Elevations (23089-A-0120-P6)

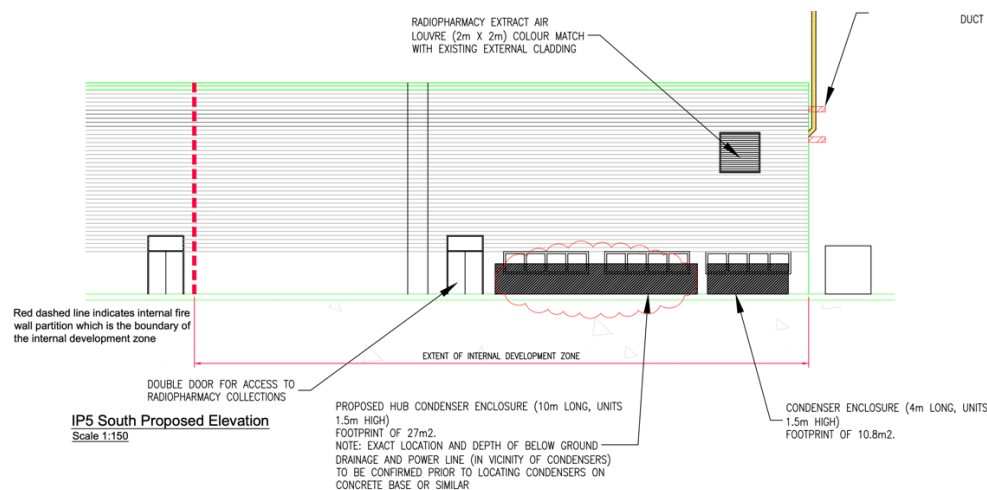


Figure 5: IP5 Proposed Southern External Elevations (23089-A-0120 **P10**)

The proposed infrastructure will be of identical/similar scale and character as the existing installations. The proposal is therefore considered acceptable and necessary for the maintenance, the quality, safety, and stability of temperature-sensitive medicines within the storage facility.

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
GP1	Climate Change
GP2	General Amenity
GP5	Natural Environment
GP6	Quality Design
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"*

GP5 – Natural Environment

"Development will be permitted where:

- i. The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site"*

GP6 – Quality Design

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

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)*

This SPG sets out the circumstances when an assessment for air quality purposes is required and clarifies the appropriate minimum amount of information required for the air quality assessment. Mitigation measures and off setting of impacts through compensation are also provided. This SPG is focussed on the impact to human health.

Planning Appraisal

This application seeks full planning permission for the installation of external building extract ducts, air intake/extract louvres, condenser enclosures and associated works. Below are subheadings which address specific issues with the proposal whilst complying with National and Local Policies.

Principle of Development

As mentioned, the eastern section of building is already subject to previous planning approval (24/0611) for the proposed partial change of use of building IP5 from B8 storage to B1 laboratory use and ancillary spaces and associated minor external works, known as the TRAMS project.

The proposed installation of external extract ducts, air intake/extract louvres, and condenser units and enclosures on the elevations of the industrial unit is considered acceptable in principle. This is because the building already accommodates identical or similar plant and ventilation infrastructure, and the proposed additions would be consistent with the established character and appearance of the existing development.

This application proposes to install the necessary ancillary infrastructure to support and regulate the Controlled Temperature Storage Facility. As mentioned above, this is a critical requirement for the TRAMS SE Hub, enabling NWSSP to maintain the quality, safety, and stability of temperature-sensitive medicines and starting materials throughout manufacturing and distribution. Many products that will be handled by NWSSP are highly susceptible to temperature variation. Validated, monitored storage ensures these items remain within their licensed conditions, protecting patient safety and supply continuity across NHS Wales.

Without this infrastructure, the organisation faces risks such as batch failures, product recalls, regulatory non-compliance, and significant financial loss; particularly for high-value or specialist medicines. Climate change further increases the need for resilient, controlled temperature facilities. Rising ambient temperatures and more frequent heatwaves heighten the risk of environmental excursions in areas not designed for modern climate resilience. Incorporating robust controlled temperature storage now future-proofs NWSSP operations, ensuring continuity of supply and regulatory compliance as environmental pressures intensify.

Investing in this infrastructure provides long-term operational stability, reduces the likelihood of costly product losses, and ensures NWSSP can continue to meet its statutory and regulatory obligations. It provides safeguarding of high-value stock, reduction in waste, assists with uninterrupted service delivery, and ensures that the TRAMS SE Hub remains compliant, resilient, and fit for purpose for the future needs of NHS Wales.

Overall, the proposal intends to install low-scale ancillary infrastructure on the external elevations to support an existing use. This section of the site also benefits from previous planning approval to install similar/identical infrastructure, as seen on the submitted approved plans. Therefore, it is considered that the viability and principle of the development is firmly established.

Impact on 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. The nearest sensitive noise receptor is located approx. 570m west of the site (Church Lane) and is also screened by woodlands either side of the A48, thus mitigating the potential noise impacts on residential dwellings. Given the unit's location within an established employment area and not within 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) of the Newport Council Local Development Plan.

Impact on Biodiversity and Air Quality

Green Infrastructure and Biodiversity

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.

The surrounding industrial estate consists of tarmac car parking, semi-improved grassland verges, and woodlands to the west. Only 27m² of green space will be lost for the installation of the condenser unit on southern elevations, although this will be compensated for as seen within the accompanying Green Infrastructure Statement. Overall, the site area comprises 102m² and all the remaining additions proposed will be installed either on tarmac or on the building itself. The submitted Green Infrastructure Statement also proposes to plant flower beds on the surrounding green fields to provide a net benefit biodiversity value, in line with the guidance provided within Planning Policy Wales Edition 12. It is therefore considered that the proposal will not have any significant impact on the site's green infrastructure and a net benefit in biodiversity value will be achieved.

Air Quality

It is acknowledged that Imperial Park is a sensitive area for air quality and emissions, given the numerous existing flues/machinery/plants installed on the surrounding industrial buildings. No. 4 extract ducts have already been installed on the eastern elevations, as seen in figure 3, the proposal intends to install no. 4 additional extract ducts as part of the aseptic suites build.

No rise in CO₂ levels or harmful emissions from this system are expected. The proposed air compressor is oil free and the compressors draw the make-up air from its surroundings in the warehouse through the unit and out. The extract air temperature is expected to be no greater than 20°C above the ambient air temperature whilst the air compressor is running.

The Discharge Vent Stacks, East Elevation, are extracting air from the Isolator Rooms. No rise in CO₂ levels is expected. The CO₂ contributors within the Isolator rooms are its occupants. Each of the Isolator Rooms with a Local Exhaust Ventilation (LEV) have a maximum occupancy of 12 Persons.

No rise in CO₂ levels or harmful emissions are expected from the Controlled Storage Facility Offices Discharge Air Louvre, North Elevation. The Mechanical Ventilation Heat Recovery (MVHR) Unit supplies fresh air and extracts air from two offices. The only CO₂ contributors within the offices are its occupants there are 3 occupants per office totalling 6 persons.

Given the anticipated emission levels from the proposed installations and the fact that 4 no. extract ducts have already been installed, it is considered that an Air Quality Impact Assessment would not be needed to accompany the application and therefore the proposed development will not have a significant or damaging impact on the area's air quality.

Conclusion

This letter has been prepared on behalf of NHS Wales Shared Services Partnership to accompany a full planning application in respect of the proposed installation of external building extract ducts, air intake/extract louvres, condenser units and enclosures and associated works at IP-5, Celtic Way, Newport, NP10 8BE.

The development involves the minor installation of external infrastructure to support an existing use. Existing infrastructure of similar/identical scale and character as the proposed additions have already been installed on the building. 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,

A handwritten signature in black ink, appearing to read 'Scott Davies', with a stylized flourish at the end.

Scott Davies

Student Planner | Asbri Planning Ltd