

FULL PLANNING APPLICATION

**WERN INDUSTRIAL ESTATE, ROGERSTONE,
NEWPORT NP10 9FQ**

**CHANGE OF USE FROM SUI GENERIS
TO B8 SELF-STORAGE FACILITY**

PLANNING STATEMENT

SEPTEMBER 2024



CONTENTS

Sections

1. Introduction
2. Site and Surroundings
3. Development Proposals
4. Planning Policy Context
5. Material Considerations
6. Summary and Conclusion

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a planning application, submitted on behalf of Blue Self Storage, in relation to the following development proposal, located at land at Wern Industrial Estate, Rogerstone, Newport NP10 9FQ.

"CHANGE OF USE FROM SUI GENERIS TO B8 SELF-STORAGE FACILITY"

Purpose and Structure of this Statement

- 1.2 This Planning Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations relevant to the proposals, together with reasoned justification in support of the proposed development.
- 1.3 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** analyses the key planning considerations arising from the proposed development (considering the planning policy context); and
 - **Section 6** sets out our conclusions.

2.0 SITE AND SURROUNDINGS

The Site

- 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 location in red)

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



Aerial view of the site and surrounding context (approximate site location 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

The 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 A planning history search has been undertaken via Newport City Council's online planning service. The planning application shows that the site has not been subject to any previous planning history during this plan period; however, a number of relevant proposals have been granted in the surrounding area.

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

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.

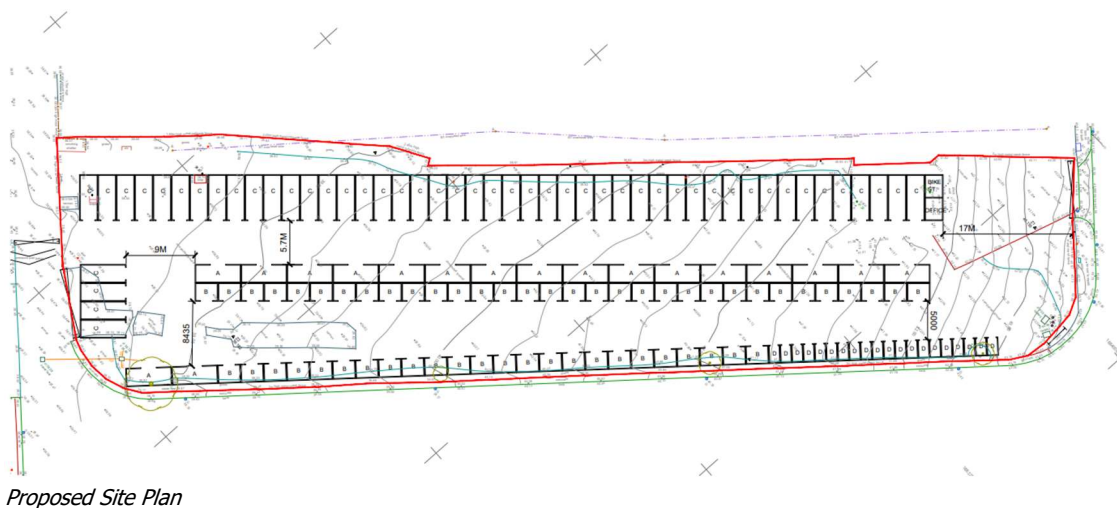


3.0 DEVELOPMENT PROPOSALS

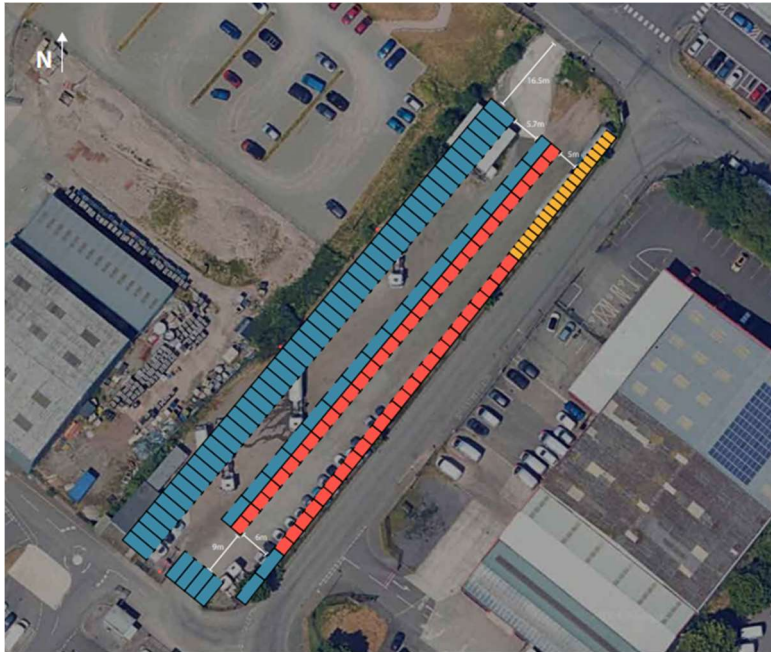
- 3.1 The proposed development comprises the development of the site for the siting of 144 self-storage containers.
- 3.2 The proposed units would vary in size, ranging from 1.5 – 6 meters in length. The table below displays the size and number of units.

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

- 3.3 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.
- 3.4 The proposed site plan can be found below.



- 3.5 For reference, the site plan has been extracted, and placed atop an aerial image of the site to allow for ease of review. This can be found below:



Proposed Site plan in context

- 3.6 The site layout has been designed to allow for adequate space for vehicles to manoeuvre between the proposed units, and also allow for a legible access point that adjoins the unnamed road to the north of the site.
- 3.1 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

3.2 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



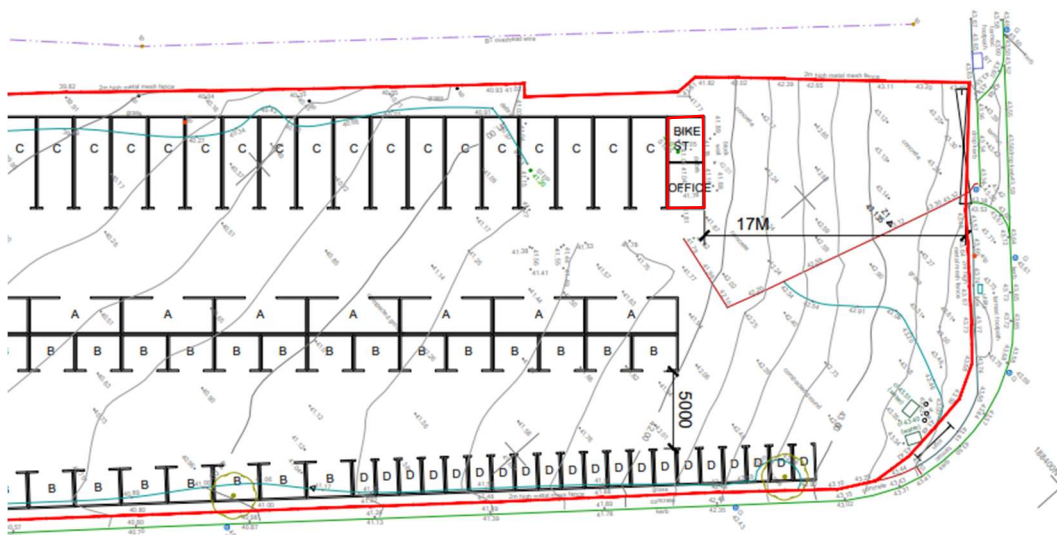
Type 3 – 2.4m x 6m unit – door on end



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



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



Site Plan extract (Bike storage and Office placement outlined in red)

4.0 PLANNING POLICY CONTEXT

- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Planning Statement.
- 4.2 The key planning policies of relevance to the determination of the application are outlined below. A detailed assessment of how the proposed development accords with these policies is provided in Section 5 (Material Considerations) of this Statement.

National Planning Policy

- 4.3 The following policy / guidance documents prepared at the national (Welsh Government) level area of relevance to the determination of the application.

Planning Policy Wales (12th Edition, February 2024)

Sustainability

- 4.4 Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Section 2 of PPW considers the importance of achieving sustainable placemaking and sets out a series of principles which development proposals should seek to achieve – those relevant to the proposed development are as follows:
- *'Growing our economy in a sustainable manner - The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services.*
 - *Making best use of resources - The efficient use of resources, including land, underpins sustainable development.*
 - *Creating and sustaining communities - It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others''.*

Green Infrastructure

- 4.5 It is set out in PPW that *'Green infrastructure is the network of natural and semi-natural features, green spaces, rivers, and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.*

Good Design

- 4.6 It is set out within PPW that *"Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for*

everyone" (paragraph 3.5). Further detail regarding the objectives of good design is set out within Technical Advice Note (TAN) 12: Design (2016) – as detailed below.

- 4.7 PPW advises in Paragraph 3.7 that *"Good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution"*.

Economic Development

- 4.8 Paragraph 5.4.1 of the PPW states, *"For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes"*.

Technical Advice Note (TAN) 12 – Design (2016)

- 4.9 Detailed guidance on the objectives of good design is provided within TAN 12. The objectives of good design are set out within the following categories:

"Character

- *Sustaining or enhancing local character*
- *Promoting legible development*
- *Promoting a successful relationship between public and private space*
- *Promoting quality, choice and variety*
- *Promoting innovative design*

Community Safety

- *Ensuring attractive, safe public spaces*
- *Security through natural surveillance*

Movement

- *Promoting sustainable means of travel*

Environmental Sustainability

- *Achieving efficient use and protection of natural resources*
- *Enhancing biodiversity*
- *Designing for change"*

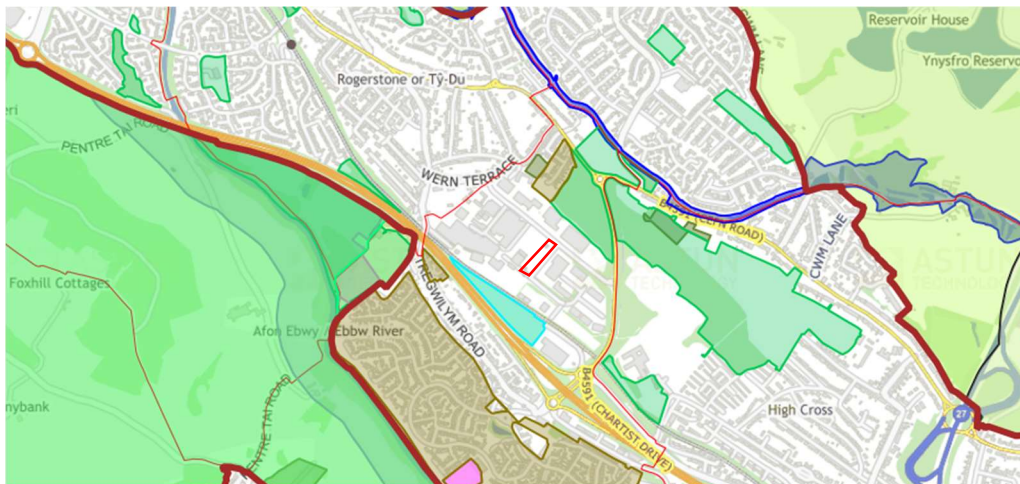
TAN 23 – Economic Development (2014)

- 4.10 This guidance defines economic development as anything that that generates wealth, jobs and income. TAN 23 sets out guidance for LPA's when putting together Development Plans and planning for economic developments.

Local Planning Policy

- 4.11 We have undertaken a review of the planning policy context associated with the site, and the following are the principal provisions of relevance to this scheme.
- 4.12 The current (adopted) Development Plan for Newport City Council consists of the following:
- Newport City Council Adopted Local Development Plan (2011-2026).

LDP Proposal Map

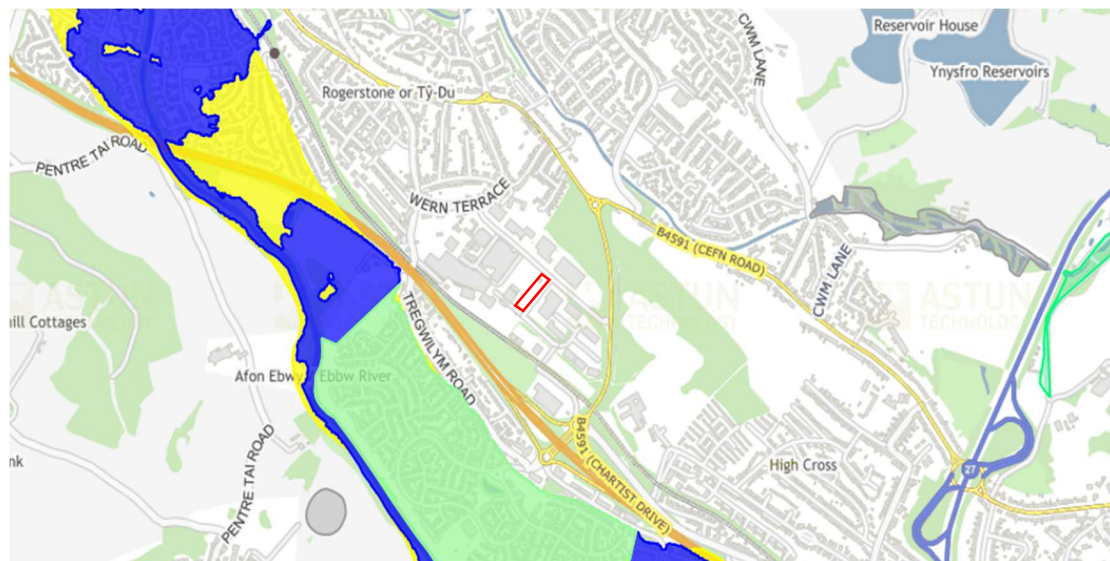


Extract from Newport LDP Proposal Map (approximate site location in red)

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

- 4.13 In the context of the adopted LDP, the site is not subject to any key planning designations or proposals.

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

4.14 In the context of the adopted LDP, the site is not subject to any constraints highlighted within the LDP constraints map.

4.15 Considering the above, it is considered that the most relevant policies of the adopted LDP for this application 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

4.16 The following Supplementary Planning Guidance (SPG) have also been taken into consideration:

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

5.0 MATERIAL CONSIDERATIONS

5.1 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;
- Green Infrastructure; and
- Other Material Planning Considerations.

5.2 These issues are discussed in further detail below.

Principle of Development

5.3 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"*

5.3.1 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.

5.4 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.

5.5 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;'*

5.6 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.

5.7 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*).

- 5.8 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
- 5.9 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.
- 5.10 The principle of development therefore complies with the aims of LDP Policy SP1 (Sustainability) and the general aspirations of Local and National Policy.

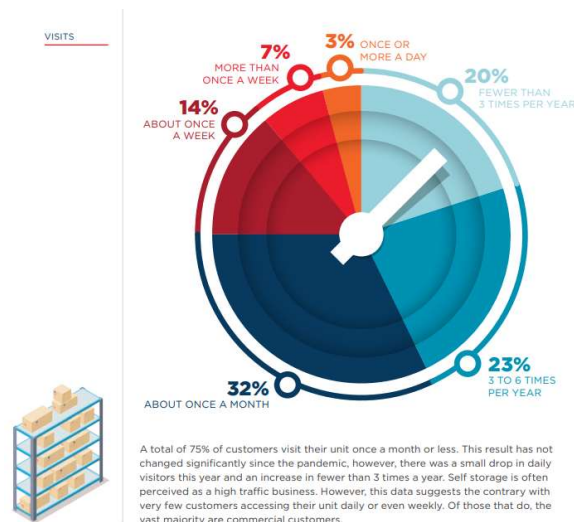
Design and Layout

- 5.11 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.
- 5.12 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;*
- 5.13 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).
- 5.14 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.
- 5.15 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.

- 5.16 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, repurposed 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.
- 5.17 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.
- 5.18 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, iii, iv, and v.

Highways, Access and Parking

- 5.19 Access to the site is provided from the unnamed road that serves the Wern Industrial Estate. The road benefits from street lighting and footway, providing pedestrian access within / across the industrial estate.
- 5.20 Given the location of the site, within an established industrial estate, where the roads have been appropriately designed to meet higher levels of traffic, it is evident that the proposed development is in an appropriate location in terms of impact to the adjoining highway network.
- 5.21 In addition, 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.
- 5.22 The proposals will utilise a one way system that allows users to park outside their container for a short period of time before exiting the site. Accordingly, the proposal is considered acceptable from a parking perspective.
- 5.23 It should be noted that the proposed development would not create any buildings with floor space and so the above standards would be difficult to equate to a quantum of parking. The layout of the site would allow adequate distances for cars between the stacks, to ensure users could park their cars adjoining their container.
- 5.24 The 2022 Self Storage Association UK's Industry Report outlines that the impact upon traffic generation is negligible as part of the proposals. 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 overleaf extract from the report):



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

- 5.25 As such, the trip generation as part of the proposals is likely to be negligible.

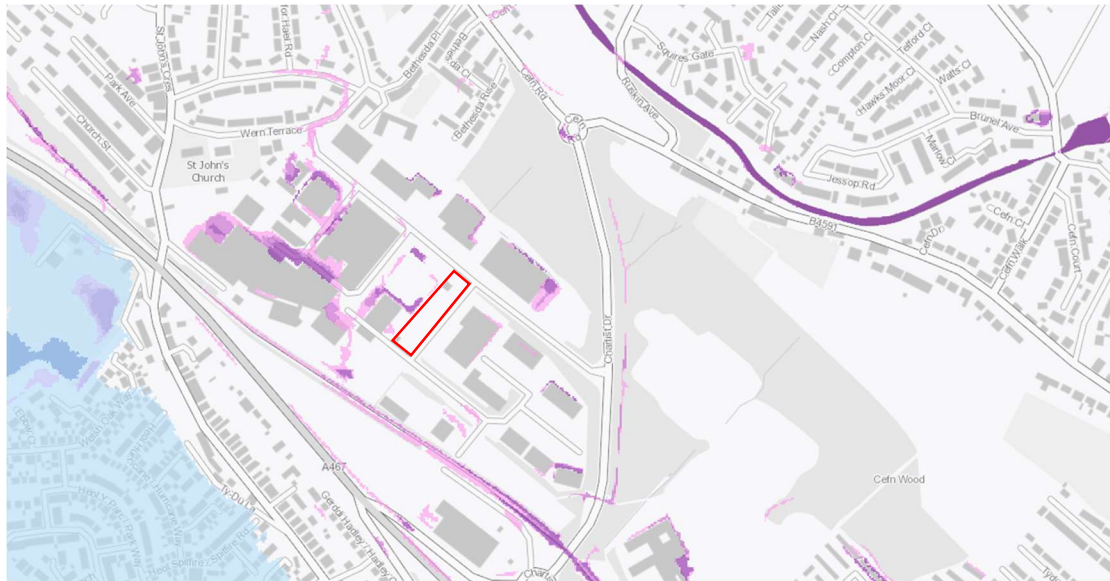
Green Infrastructure

- 5.26 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.
- 5.27 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.
- 5.28 Given the proposed layout of the site, trees along the boundary will need to be removed. In response to this loss of Green Infrastructure, a betterment will be provided on site through the addition of a Green Roof, and the Applicant is open to discussions regarding a potential contribution in line with relevant Planning Policy.
- 5.29 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.
- 5.30 In terms of enhancement, it is considered that biodiversity features will be incorporated into the SuDS design of the scheme. Accordingly, it can be concluded that the scheme will result in an ecological betterment, and by association, achieves a net gain in biodiversity, in accordance with Chapter 6 of PPW 12.

Other Material Planning Considerations

Flood Risk and Drainage

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

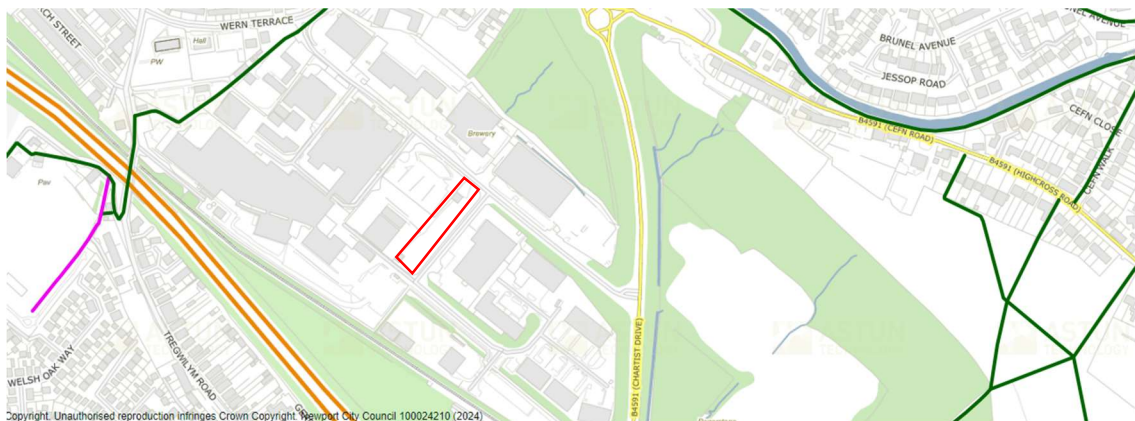


Extract taken from NRW Flood Risk Map (approximate site outline in red)

Key					
Flood Risk from Rivers			Flood Risk from Surface Water & Small Watercourses		
	High			High	
	Medium			Medium	
	Low			Low	

Public Rights of Way

- 5.32 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.



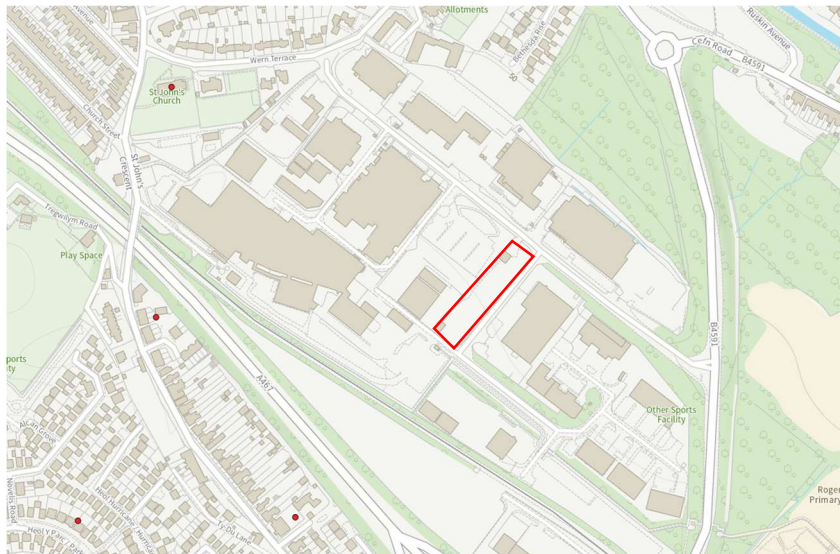
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Newport City Council Public Rights of way Map Extract (approximate site outline in red)

Key			
	Restricted Byway		Footpath

Heritage

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



Historic Wales Map (approximate site outline in red)

Key			
	NMRW(RCAHMW)		HER (Welsh Archaeological Trusts)

6.0 SUMMARY AND CONCLUSIONS

- 6.1 This planning application proposes the development of use a self-storage facility to allow for a total of 144 shipping containers as self-storage containers.
- 6.2 The proposal is considered to be policy compliant and both appropriate and acceptable. It is considered that there are several material considerations in support of the application, which include the following:
- The site is located within an established commercial and retail area falling within an industrial estate;
 - The development proposes and employment opportunity 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 not have a material impact on traffic or the highway network;
 - The proposed design has considered the surrounding context and, as such, is considered to be appropriate; and
 - The proposed development will not have a material impact on the amenity of neighbouring occupiers.
- 6.1 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme, which makes good use of this site, to the benefit of the wider community.
- 6.2 Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the application be approved.