

10 November 2025



VIA EMAIL
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Dear Geraint,

APPLICATION REF. 25/0177 – PLOT N70 (UNITS 19-21), INDURENT PARK, NEWPORT

RESERVED MATTERS APPLICATION RELATING TO LAYOUT, SCALE, APPEARANCE, ACCESS AND LANDSCAPING FOR 3 NO. COMMERCIAL UNITS (USE CLASS B1, B2, B8) PURSUANT TO OUTLINE PLANNING PERMISSION 06/0471 FOR A MIXED USE REGENERATION OF THE FORMER LLANWERN STEELWORKS AND PARTIAL DISCHARGE OF CONDITIONS 01 (RESERVED MATTERS), 08 (MATERIALS), 09 (DETAILS OF HARD LANDSCAPED ACCESS), 10 (BOUNDARY TREATMENTS), 11 (MANAGEMENT STRATEGY FOR MAINTENANCE OF OPEN SPACE), 12 (OFF STREET PARKING AND CYCLE PARKING), 15 (EMERGENCY ACCESS), 16 (DETAILS OF ROADS/CYCLEWAYS/FOOTWAYS), 18 (ESTATE ROADS), 22 (STREET LIGHTING AND CAR PARKING AREAS), 24 (SITE LEVELS), 33 (SURFACE WATER DISPOSAL), 34 (FOUL AND SURFACE WATER DRAINAGE), 39 (SUSTAINABILITY STATEMENT) AND 43 (FIRE FIGHTING ACCESS)

Thank you for your comments received 10 September 2025 relating to the Reserved Matters application for Plot N70 (Units 19-21) at Indurent Park Newport (ref. 25/0177) which followed the Major Projects meeting on 9 September 2025. In summary, the feedback related to:

1. Departure from the approved sub-area masterplan (under application ref. 14/1124, as part of the approval of the discharge of condition 4 attached to the Outline Planning Permission ref. 06/0471);
2. Hardening of frontage to the Queensway and Monks Ditch Drive with limited space for landscaping in contrast to Unit 7 and other adjacent units;
3. Pressurisation of the Monks Ditch boundary offering little scope for structural planting to break up the profiles of large buildings readily visible from adjacent residential phases and concerns that maintenance access to this designated main river may preclude effective landscaping; and
4. Concern over the visibility and potential impact of operations within the service yards from the residential area which would not be screened out by the buildings.

We subsequently held a meeting with yourself and Joanne Davidson on 2 October 2025 to discuss your comments in further detail and outline our intended approach to address these. Alongside Indurent and the wider consultant team, we have reviewed the comments at length and are pleased to enclose a revised layout for informal submission in response, together with other documents as discussed at the meeting. The revised drawings and documents are set out below:

- Proposed Site Layout (ref. 701103-RLA-25-XX-PL-A 0003 Rev D);
- Proposed Floor Plans Unit 19 (ref. 701103-RLA-25-XX-DR-A 0005 Rev C);
- Proposed Floor Plans Unit 20 (ref. 701103-RLA-25-XX-DR-A 0007 Rev A);
- Proposed Floor Plans Unit 21 (ref. 701103-RLA-25-XX-DR-A 0009);
- Proposed Elevations Unit 19 (ref. 701103-RLA-25-XX-EL-A 0006 Rev B);

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- Proposed Elevations Unit 20 (ref. 701103-RLA-25-XX-EL-A 0008 Rev A);
- Proposed Elevations Unit 19 (ref. 701103-RLA-25-XX-EL-A 0010 Rev A);
- Detailed Soft Landscape Proposals & Specification Sheet 1 of 3 (ref. 5124-RPS-XX-XX-DR-L-9007 Rev P07);
- Detailed Soft Landscape Proposals & Specification Sheet 2 of 3 (ref. 5124-RPS-XX-XX-DR-L-9008 Rev P07);
- Detailed Soft Landscape Proposals & Specification Sheet 3 of 3 (ref. 5124-RPS-XX-XX-DR-L-9009 Rev P07);
- Detailed Soft Landscape Plan GA (ref. 5124-RPS-XX-XX-DR-L-9017 Rev P06);
- Detailed Soft Landscape Plan Sections (ref. 5124-RPS-XX-XX-DR-L-9018 Rev P06) (updated to capture entire phase and showing relationship with Monks Ditch);
- Landscape Management Plan (“LMP”) (ref. 794-PLN-LAN-5124 Rev P02) (updated to address comments on long term viability and showing how machinery can access Monks Ditch without prejudicing landscaping);
- Green Infrastructure Statement (“GIS”) (October 2025) (updated to reflect changes to green infrastructure)
- Boundary Treatments (ref. 701103-RLA-25-XX-PL-A 0019 Rev B);
- Marketing Letter (JLL, 10th October 2025) (including commentary on market conditions, unit sizing and commercial viability);
- Existing Site Layout Constraints Plan (ref. 701103-RLA-25-XX-PL-A 0002 Rev B);
- Indicative Aerial CGI (ref. 701103-RLA-25-XX-DR-A-0030);
- Unit 19 Front CGI (ref. 701103-RLA-25-XX-DR-A-0031); and
- Unit 21 Front CGI (ref. 701103-RLA-25-XX-DR-A-0032)

Your feedback has been thoroughly considered in the refinement of the revised proposals. We consider the amendments made to be comprehensive and positively address the comments received. The design amendments achieve high standards of design and place-making and in accordance with national and local planning policy.

Overview of changes

In summary, the following changes have been accommodated in the updated layout:

- Unit 21 has moved east by 2 metres due to the visibility splay for the site entrance being reduced for a 30mph speed (previously designed for 40mph) and also 2 metres north creating more green space for landscaping alongside the new estate road.
- The above has resulted in the provision of 2 metres of extra greenery along Monks Ditch increasing the distance from its edge to Unit 21 to 20 metres (as shown on the accompanying Landscape Sections 9018 Rev P06). The distance increases to 28 metres to Unit 19 and 30 metres to Unit 20.
- Maintenance path to rear of Unit 21 is now a seeded crate system increasing overall landscaping.
- The amenity area for Unit 21 now has a green landscaped area as a result.
- Unit 21 has now been stepped to move the entrance area away from the ‘pinch point’ - this results in design betterment by retaining the entrance adjacent to the road.
- Unit 21 escape stairs have been moved into the warehouse area to allow the office to move west.
- Service yards (and Unit 21 car park) are now fully screened from the Monks Ditch through the inclusion of solid timber acoustic fencing.
- Unit 19 service yard fence has moved inbound (east) increasing the distance from Monks Ditch boundary and increasing landscape area.
- Improvements to landscaping areas, including additional tree planting along Monks Ditch, along Monks Ditch Drive and throughout the phase.
- Landscape strip increased to the west of Units 19 and 20 to allow tree planting alongside both units which helps facilitate machine access to Monks Ditch for periodic maintenance. Double staggered tree planting is retained.

- New permanent post and rail fence is proposed along Monks Ditch as shown on the landscape drawings and boundary drawings.
- Unit 19 haunch height reduced from 10 metres to 8 metres – consistent with Units 20 and 21 (and adjacent Unit 7). This results in a consistent height across the phase and reduces visual impact from residential area.
- Loading yards have been reduced by 2 metres to all units to further reduce visual impact whilst also enabling increased landscaping.
- Units 19 and 20 proportions have changed slightly to accommodate other changes above.
- Car park arrangements have been adjusted across the phase to accommodate more landscaping.
- As a result of changes to the scheme listed above there is now a wider landscape strip alongside Queensway (Unit 19 frontage).
- Unit 19 has been chamfered to pull the unit further away from the access into Indurent Park and therefore increases landscaping area.
- Unit 19 has moved approximately 500mm further away from Unit 7 and, again, created more green area alongside the access road.
- Additional glazing has been added to the frontage of Unit 19 nearest to the entrance into the park.
- Landscaping within the red line overall has increased from approximately 20% up to 25%.

Further details regarding the changes above are set out below and shown on the accompanying drawings.

Layout design and alignment with Employment Sub Area Masterplan

Following your comments regarding the departure from the approved Employment SAMP (approved in 2014), the revised proposal now further aligns with the guiding principles of the SAMP, including three buildings accessed from Monks Ditch Drive. The units are now also positioned to reduce visual impact on adjacent residential areas and have lower building heights (consistent across each of the three units).

Whilst the SAMP originally envisioned the potential for B1(A) offices on this plot, the enclosed Marketing Letter from JLL discusses the current market demand and conditions for this area together with commentary on the unit sizing and why the proposed uses, mix and sizes are proposed. As market leaders, Indurent's design code reflects occupier demand and ensures the best standard of units. We trust this demonstrates Indurent's desire to deliver a high-quality and commercially viable scheme.

In terms of approach to building massing and height in response to both design considerations and SAMP alignment. As an alternative to the small units proposed on the site, we have looked at the implications of delivering a single unit which would result in a height of 12.5m being required, representing a significant increase from the previously anticipated 8 metre units. While this approach would consolidate massing into a single form, it introduces challenges both in terms of visual impact and marketability. A single unit of this scale would result in a more dominant massing profile, which risks conflicting with the established character of adjacent development and may prove less attractive from a leasing perspective.

In light of this, the proposed strategy involves three smaller units on the plot which are more appropriate and offer several benefits, including:

- Visual Integration: The reduced height and broken massing better reflect the scale and rhythm of surrounding units, including Unit 7, which sits adjacent and shares similar height characteristics.
- Employment SAMP compliance: The revised proposal now further aligns with the Employment SAMP, including smaller buildings and landscaped buffers to mitigate visual impacts.
- Leasing flexibility: Smaller units offer greater flexibility in terms of tenant mix and market appeal, addressing concerns raised regarding the viability of a single large unit.

In addition, the haunch height of Unit 19 has now been reduced from 10 metres to 8 metres, ensuring consistency with Units 20 and 21 and adjacent Unit 7. This adjustment is reflected in the updated elevation drawings and revised section plan illustrating the comparative unit heights across the plot.

Landscaping provision and Monks Ditch boundary

Further to the recent meeting and subsequent revisions to the layout for Plot N70, we have considered the landscaping provision in the context of the wider Indurent Park Newport development. Through further layout refinements, this has resulted in increased green space on Plot N70 which now demonstrates a significantly enhanced landscaping strategy when compared to earlier phases of the scheme.

Based on the current design layout and planning submissions, the proportion of land allocated to landscaping on Plot N70 exceeds all other phases, with a notable increase in both soft landscaping and ecological buffer zones. This uplift reflects NCC's feedback and has been incorporated to support biodiversity, visual amenity, and site integration with adjacent uses. The landscaping on Plot N70 now accounts for approximately 25% of the total plot area, which increases to 33% when including the landscaping of Monks Ditch itself.

In terms of the Monks Ditch boundary, the gabion wall has now been removed as this is not required and has since been replaced with a strip of continuous tree planting and hedging for screening along this boundary. In terms of maintenance of Monks Ditch, the proposed machinery to be used is now shown in the updated LMP which confirms that the machines will have no implications on the tree canopies or landscaping proposed in this area. Furthermore, due to the location of the plot being at the southerly end of Monks Ditch, silt accumulation etc. is lower and it is anticipated that maintenance access will only be required every 7 years or so. The infrequency of the need to access Monks Ditch via this plot therefore suggests that there will be no conflict with landscaping.

Visibility of service yards

Additional screening in the form of timber acoustic fencing is now proposed to screen the service yards for units 19 and 20 yards as well as the back of Unit 21's car parking area. Landscaping has also been introduced to reduce visibility from across the Monks Ditch to the residential area through additional double staggered trees proposed to be planted to the western boundary alongside the maintenance access track. Native hedgerow and shrubs are also proposed along this same boundary as well as a new permanent post and rail fence.

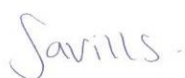
Summary

We trust these revised drawings and documents may now be met with your approval and addresses your previous concerns. We would be grateful if you could please table the current layout at the next Major Projects Meeting and we look forward to receiving your feedback at the earliest possible opportunity in order for the full planning pack to be updated and the formal re-submission to be made as soon as possible thereafter.

If necessary, we would be happy to discuss any residual comments you have at a meeting. If agreed, please confirm your availability for a meeting over the next few weeks. Should you have any questions in the meantime, or wish to discuss then please do not hesitate to contact me.

I note that the current agreed extension of time ended on 4 November 2025, therefore please do let me know if a further extension of time is required.

Yours sincerely,

A handwritten signature in blue ink that reads "Savills".

Josh Price
Associate

Enc. As above