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## Planning Statement

in relation to

Plot C1  
Llantarnam Industrial Park  
Cwmbran  
Torfaen  
NP44 3SE

on behalf of

Opus Land Ltd on behalf of  
MGTS St John High Income  
Property ICVC Bank of New  
York Mellon (International) Ltd

Prepared by

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## Executive Summary

- The proposed new build two-storey industrial development will deliver a new high quality industrial unit within the existing well-established Llantarnam Park mixed-used employment area. The Site is located within a highly sustainable location in close proximity to the road network, public transport and train service.
- The Site is allocated for employment, specifically B1 use (Site Allocation Ref: EET1/4 - Llantarnam Park C) in the Local Development Plan and is situated within the well-established Llantarnam Industrial Park.
- The proposed Plot C1 development will be a single unit designed to accommodate B1, B2 and B8 use classes depending upon the final user. Although the proposed development is not wholly in accordance with the allocation, the Forward Planning (LDP/Policy) Officer at Torfaen Borough Council confirmed within the written pre-application response, that *“the proposal for B1/B2/B8 would facilitate the expansion of the existing adjacent premises, and is considered acceptable in principle.”* The proposed uses are in line with existing uses on the wider estate.
- The development will provide operational/warehousing space and office accommodation together with associated yards and parking. The development is speculative, and the building will be designed with sufficient flexibility to appeal to the widest possible market.
- The proposed building will be steel-framed and designed with high-quality thermally efficient cladding and roofing materials. These will be dressed in contrasting colours to create visual interest whilst also being sympathetic to its surroundings in the established Industrial Park. The proposed design is sympathetic to its surroundings in the established industrial park. As confirmed by the ‘Forward Planning (LDP/Policy) Officer, within the written pre-app response *“It [the proposed development] relates well to the existing built form and would utilise existing infrastructure without exceeding capacity.”*
- The proposed development represents a substantial investment in the area in accordance with the original Welsh Government intentions for the area. The investment will enhance the viability and further reinforce economic growth of Llantarnam Park and in Cwmbran. Furthermore, the development will create a plethora of new jobs through construction and operational phases, which will boost the local economy and overall have a positive economic impact on Llantarnam Park and Cwmbran.
- The proposed development landscape strategy will positively enhance the surrounding landscape through new planting areas. This will provide the Site with a strong landscape structure around the site boundary; and provide some screening and separation between adjacent plots.
- The sustainable design, combined with the substantial economic benefits and investment along with the significant landscape improvements, the proposed development will support the direction for development in Wales as established within Future Wales: The National Plan 2040 (February 2021), as well as the principles of the sustainability strategy set out in Planning Policy Wales (Edition 12: February 2024).

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- Overall, the proposed development is in accordance with National and Local Policy and should therefore be granted planning permission, as no material considerations indicate otherwise.

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## 1. Introduction

- 1.1 This Planning Statement has been prepared by Lambert Smith Hampton (LSH) on behalf of Opus Land Ltd on behalf of MGTS St John High Income Property ICVC Bank of New York Mellon (International) Ltd (“the Applicant”). Its purpose is to set out the planning case in support of an outline planning application for the erection of a new build, two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking, located at Plot C1 Llantarnam Industrial Park, Cwmbran, Torfaen, NP44 3SE.
- 1.2 Specifically, this application seeks outline planning permission for the following description of development:
- “The erection of a new build, two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking, located at Plot C1 Llantarnam Industrial Park, Cwmbran, Torfaen, NP44 3SE”.*
- 1.3 Opus Land is an established real estate company with a successful track record of developing and investing in property across the UK for over 20 years, and working with occupiers, investors and landowners.
- 1.4 The application follows pre-application engagement with Justin Jones, Principal Planning Officer at Torfaen County Borough Council, which has informed the scope and extent of technical assessments provided in support of the proposal. In addition, full pre-application engagement has taken place with Marc Smith at Caerphilly Borough Council, on behalf of the SuDS Approval Body (SAB).
- 1.5 In addition to this Planning Statement, the application comprises the following:
- Application Forms and Certificates
  - Application Drawings:
    - Location Plan
    - Site Survey
    - Survey contours and section
    - Parameters Plan
    - Indicative Layout Industrial Use
    - Indicative Layout Warehouse Use
    - Indicative Elevations
    - Indicative Floor Plans
  - Design and Access Statement

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- Transport Statement
  - Flood Consequence Assessment and Sustainable Drainage Strategy
  - Air Quality and Noise Impact Assessments
  - Ecological Assessment
  - Arboriculture Survey and Tree Constraints Plan
  - Energy Statement
  - External Lighting Report
  - Desk Study and Preliminary Risk Assessment
  - PAC Report

1.6 Following this introduction, the remainder of the report is structured as follows:

- **Section 2** - Describes the site and its surrounding context, along with providing a list of relevant planning applications.
- **Section 3** - Provides a summary of the pre-application engagement that has been undertaken in support of this application.
- **Section 4** - Sets out a detailed description of the proposed development.
- **Section 5** - Reviews the relevant local and national planning policy context.
- **Section 6** - Considers the key planning issues that are relevant to the determination of the application.
- **Section 7** - Concludes the foregoing commentary and highlights why planning permission should be granted without delay.

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## 2. Site and Surrounding Context

- 2.1 The Application Site ('the Site') is shown on Location Plan (D: 2540/PL200). It extends to approximately 1.31 hectares (3.24 acres) and forms part of the wider Llantarnam Industrial Park, a mixed employment location, located approximately 3.5km from Cwmbran town centre. The Site is rectangular in shape and currently comprises undeveloped/vacant, wasteland/grassland with an access onto the existing road infrastructure within the Industrial estate.
- 2.2 Llantarnam Industrial Park, is comprised of a group of large, high quality predominantly industrial buildings, accommodating some of Torfaen's key employers along with a number of larger, self-contained offices.
- 2.3 The western portion of the Site slopes upwards towards Llantarnam Park Way, along which there is on-street parking and pedestrian footways. To the northwest there is a yard, outbuilding and solvent store associated with the existing unit from which MCC Labels currently operate. To the north-east of the Site there is a public right of way which is routed around the northern boundary of the existing MCC Labels unit to the north of the Site.
- 2.4 The eastern most boundary of the Site is formed by woodland and the Dowlais Brook, a Main River, which runs adjacent to the Site. The woodland located along the eastern boundary of the Site is subject to a Tree Preservation Order. Beyond this is woodland this and part of Llantarnam Industrial Park further east.
- 2.5 In addition, the Llantarnam Ponds Site of Importance for Nature Conservation (SINC) abuts the eastern boundary of the Site and is located to the east of Dowlais Brook, extending eastwards to Llantarnam Park Way. The River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located approximately 6 metres downstream from the Dowlais Brook.
- 2.6 Trees form the southern boundary of the Site, with industrial/warehousing units beyond this in an area of the Business Park known as Lakeside Park.
- 2.7 Access to the Site is provided via Lakeside Road which is accessed from Llantarnam Parkway, via Newport Road, via the A4042 which can be accessed from the M4 to the south.
- 2.8 The majority of the Site falls within Flood Zone 1, with a low risk of fluvial and pluvial flooding, as confirmed in the submitted Flood Consequence Assessment & Sustainable Drainage Strategy. The area immediately adjacent to the east of the site is within Flood Zone 2 (Medium) and Flood Zone 3 (High). The land adjacent to Flood Zone 3, covers the area of the Dowlais Brook to Llantarnam Park Way, broadly corresponding to the boundary of the SINC.
- 2.9 The closest bus stops to the Site are located on Llantarnam Park Way approximately 550m to the north of the site. The bus stop is served by the number 23 bus service which operates between Hereford and Newport, every 30 minutes Monday to Saturday. Further bus services are located along Newport Road approximately 950m to the north-east of the site. The stop

is served by the number X3 which operates from Pontypool to Cardiff, every 60 minutes Monday to Saturday.

- 2.10 The nearest railway station is Cwmbran Station which is approximately 2.8km to the north of the site. The station provides regular services to Manchester Piccadilly, Cardiff Central and Holyhead.

### **Planning History**

- 2.11 A planning history search has been carried out using Torfaen County Borough's online search facility. The site itself has limited planning history; the search revealed one planning application approved in October 2007, for the construction of new access into proposed development site.
- 2.12 The planning history for the site adjacent to the north is included for context, but is not included within the red line for the Application Site.

<b>Application Reference</b>	<b>Description of Development</b>	<b>Decision</b>
<b>The Site</b>		
07/P/00107(E)	Construction of new access into proposed development site and removal of existing junction	Approve with Conditions (Oct 2007)
<b>Site immediately adjacent to the north</b>		
00/P/04205	New entrance barriers/retrospective application for the installation of a waste compactor unit to the rear service yard	Approve with Conditions (August 2000)
00/P/03734	Proposed new entrance/reception extension plus associated works	Approve with Conditions (June 2000)
00/P/03701	3 No. wall mounted signs plus 5 No. freestanding flagpoles	Approve with Conditions (March 2000)
99/P/03126	Change of use of existing industrial unit to telephone call centre	Approve with Conditions (September 1999)
93/P/18360	Formation of plateaux for future industrial development and infrastructure works	Approve with Conditions (Oct 1993)



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### 3. Pre-application Engagement

3.1 Formal pre-application engagement was undertaken with Justin Jones, Principal Planner at Torfaen Borough Council. The proposal was for an existing occupier on the estate for B1, B2 and B8 use. The pre-app response set out formal consultation responses from:

- Ecology
- Economic Development
- Planning Policy

3.2 A brief overview/summary of the technical pre-application responses are set out below.

3.3 **Ecology** – The Ecology Officer was supportive and suggested a Preliminary Ecological Appraisal (PEA) would be required for an application submission, to help identify any likely ecological constraints on site.

3.4 **Economic Development** – From an economic perspective, the officer was supportive of the opportunity to grow, invest and expand within Torfaen.

3.5 **Planning Policy / Land use** – Supportive comments of the proposed development and the planning and land team recognise that the site is allocated for employment use in the adopted Development Plan, with a specific use for B1.

3.6 The feedback from the technical consultees was informative and it informed the scope and extent of technical assessments. Overall, their comments were positive and confirmed they were supportive of the principle of development for the site.

3.7 No technical consultee response was received from the Drainage or Transport Officer, but the Planning Officer provided his initial views on the following matters:

3.8 **Land Use** – Confirms the adopted Local Plan allocate the Site for B1 use, which is consistent with other uses in the area. Suggests that swept path analysis is submitted with any application to demonstrate that the largest vehicles can safely access the site and exit in a forward gear.

**Transport** – A Transport Statement should be submitted with any application that demonstrates that the number of proposed car parking spaces accords with parking standards; and information should be provided to promote the use of walking and cycling which should be demonstrated in the design;

**Drainage** – The Case Officer confirmed that the proposal would be subject to the requirements of SAB approval. Furthermore, the Case officer would expect that as part of the surface water drainage strategy, consideration be given to the Dowlais Brook, and details of the foul drainage system and connection points provided.

**Impact upon the adjoining uses** – As part of the application it will need to be demonstrated that the proposed use would not harm the operational ability of the adjoining units.

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**Design** – Upon submission of the application, the energy statement should detail how the design has responded to climate change through the use of renewable energy sources and through the reduction of energy consumption.

**SuDS Approval Body (SAB)**

- 3.9 A separate pre-application meeting was held with Marc Smith of Caerphilly Borough Council 9th April 2024, in which the 6 standards of the SuDS Approval Body (SAB) were discussed in relation to the proposed development. Those included: S1 - Surface Water runoff destination, S2 – Surface Water runoff hydraulic control, S3 – Water Quality, S4 – Amenity, S5 – Biodiversity and S6 – Design of drainage for construction and maintenance.
- 3.10 A full written response was received from Marc Smith of Caerphilly Borough Council (ref 24/0039/TCBC) on the 14th May 2024. The full response can be found at Appendix B of the submitted Flood Consequence Assessment and Sustainable Drainage Strategy.
- 3.11 The formal SAB does not need to be submitted at this stage as it is an outline application.

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## 4. Proposed Development

- 4.1 This application seeks outline planning permission for the following description of development:

*“The erection of a new build, two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking, located at Plot C1 Llantarnam Industrial Park, Cwmbran, Torfaen, NP44 3SE”.*

- 4.2 The proposed development is shown on the accompanying Parameters Plan (Drawing no. 2540/PL203), as well as the Indicative Layout Industrial Use (Drawing no. 2540-PL204) and Indicative Layout Warehouse Use (Drawing no. 2540-PL205). This section provides information about the proposed development and should be read in conjunction with the accompanying Design and Access Statement.

### **Quantum of Development / Layout**

- 4.3 The proposal is for a new build two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking. The area of Plot C1 measures 3.24 acres (13,102 sqm). The area of the proposed development for which permission is sought is 5,100 sqm which results in a development density of 39%.
- 4.4 The car park will provide sufficient spaces for employees and visitors and will be in line with local planning guidelines for use classes B1, B2 and B8. The service yard will have sufficient depth to accommodate all future anticipated vehicular movements and has been designed to meet generally accepted industry standards for turning, loading and parking.

### **Scale**

- 4.5 The Parameters Plan submitted with this application (Drawing no. 2540/PL203) notes two areas of maximum proposed building ridge height the first at the site entrance area at 51.00m AOD and the main development area at the heart of the site as 58.00 AOD.
- 4.6 The unit will be designed to have a clear internal height of up to 12m enabling the accommodation of modern racking systems, product handling equipment and high-level sprinklers, if required by occupiers.

### **Highways and Access**

#### Vehicular access

- 4.7 Access to the proposed building will be from Lakeside Road. To help screen and reduce the impact of the service yard, the yard will be positioned either to the side or rear of the building.

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Pedestrian and cycle access

- 4.8 Pedestrian footpaths are provided on both sides of the carriageway along Lakeside Glanllyn. There is a continuous footway on the northern side of the Llantarnam Park Way and dropped tactile paving is located on the Llantarnam Park Way arm and A4051 North arm of the A4051/ Llantarnam Park Way roundabout, the entrance to Llantarnam Trade & Industrial Park, and Lakeside Court.
- 4.9 There is a shared footway/ cycleway along the northern side of Llantarnam Park Way from the A4051 roundabout to the Gwent Police Headquarters. A short section of the shared footway/ cycleway is provided on the southern side of Llantarnam Park Way from the bus stop to the Police Headquarters.
- 4.10 National Cycle Network Route 49 located to the west of the site runs north-south along the Monmouthshire and Bredon Canal. It is an off-road route between Abergavenny and Newport. The route is shown in detail in the submitted Transport Statement.

**Flood / Drainage**

- 4.11 The proposed drainage strategy is set out in detail in the submitted Flood Consequence Assessment and Sustainable Drainage Strategy. The following Sustainable Drainage Systems (SuDS) are proposed for the Site:
- Rainwater Harvesting
  - Swales and Gravel Land Drains
  - Pervious Pavements
  - Geo-cellular/ Modular Systems
- 4.12 In accordance with SAB Standard S6 – Design of Drainage for Construction and Maintenance and Structural Integrity, the various SuDS features will remain privately owned and be maintained by the Development's Maintenance team.
- 4.13 The SuDS Operation and Maintenance Strategy will be in accordance with CIRIA C753 best practice, as set out in Table 2 of the Flood Consequence Assessment and Sustainable Drainage Strategy.

*Drainage Strategy Surface Water:*

- 4.14 As concluded in the FCCA & SDS, the best source of discharge for the proposed development is the nearby Dowlais Brook. The 600 mm diameter outfall that is now in place can be reused, negating the requirement for invasive construction along the riverbank.
- 4.15 According to the SAB Standard S2 - Surface Water Runoff Hydraulic Control, discharge rates should be restricted to values that are as close to greenfield runoff equivalent as is reasonably possible. The proposed discharge rate of 4.1 l/s offers a betterment of more than 97% when compared to the theoretical brownfield run-off rate (estimated to be 181 l/s in a 50mm/hour intensity storm).

- 4.16 In accordance with SAB Standard S3 – Water Quality, a SuDS treatment train has been included in the proposed drainage strategy. In hardstanding areas this will aim to control the first 5mm event runoff on site

*Drainage Strategy – Foul Water:*

- 4.17 The proposed foul drainage strategy is to utilise the exiting foul sewer in Lakeside (Glanllyn) Road. A formal S106 connection approval will need to be sought from Welsh Water.

**Design / Energy**

- 4.18 As this is an outline application, approval is currently not sought for the detailed design of the building.
- 4.19 An illustrative site layout shows a possible development option (Drawing no. 2540-PL207). The proposed building will be steel-framed and will be designed with high-quality thermally efficient cladding and roofing materials, which will be dressed in contrasting colours to create visual interest that reduce the scale and bulk of the buildings. Another important factor to be considered will be the creation of an aesthetic that will stand the test of time and age gracefully.
- 4.20 The building facades will respond accordingly to the urban realm surrounding it, glazing features will typically be positioned at the front of the site facing Lakeside Road to promote a visually pleasing and attractive facade. Plant and service spaces will be sized accordingly with longevity in mind in order to adapt for a variety of future tenant.
- 4.21 The service yard and accompanying parking areas will be suitably sized to accommodate industrial tenants and will provide a mixture of secure long stay employee parking along with accessible short stay visitor parking.

**Landscaping / Trees**

- 4.22 The east and south of the site are well-screened with existing low value vegetation. This low value vegetation has encroached onto the Site as a result of overgrowth, and will be removed / managed appropriately as required to facilitate the defined parameters development zone. The rear of the plot is screened from Llantarnam Park Way by well-established trees and shrubs on either side of Dowlais Brook.
- 4.23 A strong landscaping scheme will be created around the Site, individual tree planting and native structure planting to site boundaries that will help to provide screening, soften the built form and create ecological corridors. Species will be chosen for their biodiversity value, visual amenity and to ensure the scheme is future proof in regards to climate change.
- 4.24 Land at the front of the building will be provided for a high-quality landscaping scheme to continue the parkland feel of Llantarnam Park employment area.

**Lighting**

- 4.25 Full details of the proposed external lighting and illumination compliance levels can be found in the submitted External Lighting Report. Due to the site's location, it has been assessed as

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an environmental zone of E2, by the local authority and in accordance with the wider site DCO strategy.

- 4.26 In summary, the external lighting within the site has been designed to meet illumination levels set out within the client specification, CIBSE Lighting Guide 6 and the British Standards on a horizontal calculation grid.
- 4.27 The lighting design is predicated on a low energy, low pollution, and low maintenance approach. Low-energy products with superior light control optics were also taken into consideration in order to enhance their efficiency, decrease their carbon footprints, and lessen their impact on the surrounding ecology.
- 4.28 During the detailed design stage, alternative luminaires may be introduced, however the downward light only principle, should always be retained and implemented into the final design.

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## 5. Planning Policy Review

- 5.1 This section of the report sets out the relevant policies for the consideration of the application.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 5.3 In this case, at the time of submission, the Statutory Local Development Plan (LDP) for Torfaen County Borough Council (TCBC) (Cyngor Bwrdeisdref Sirol Torfaen) comprises:
- Local Development Plan - Written Statement (Adopted 2013) and;
  - Proposals Map (for the North and South of the Borough).
- 5.4 In addition, Future Wales: The National Plan 2040 (2021) has statutory development plan status and complements Planning Policy Wales (PPW) (edition 11, 2021) – 2019, and associated guidance within Technical Advice Notes (TANs).
- 5.5 TCBC also have a number of Supplementary Planning Guidance (SPG) documents, which do not form part of the Statutory Development Plan, however are 'material considerations' in determining planning applications/appeals.

### **Torfaen Local Development Plan (to 2021) Southern Proposal Map**

- 5.6 As per Figure 1 below, the Site is:
- Allocated for employment, specifically B1 use (Site Allocation Ref: EET1/4 - Llantarnam Park C) in the LDP.
  - Located in the Urban Area boundary of Cwmbran (as identified in the LDP Proposals Map).
  - Llantarnam Ponds Site of Importance for Nature Conservation (SINC) abuts the eastern boundary of the Site.



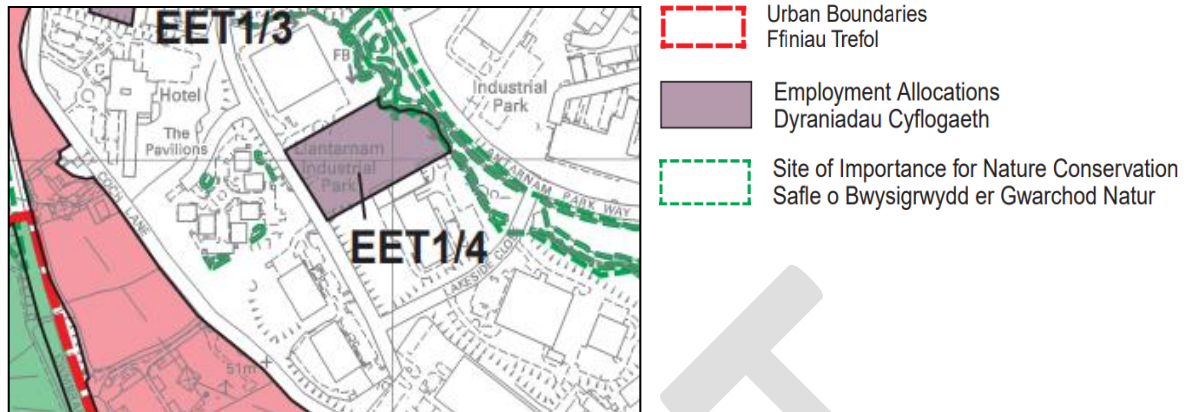


Figure 1: Extract from TCBC's LDP Proposals Map (2013)

## Local Planning Policy Context

### Torfaen County Borough Council Local Development Plan (Adopted December 2013)

5.7 The following policies within the LDP are of particular relevance to the Site and development proposal:

- Policy S1 – Urban Boundaries.
- Policy S2 - Sustainable Development.
- Policy S3 - Climate Change.
- Policy S6 – Employment and Economy.
- Policy S7 – Conservation of the Natural and Historic Environment
- Policy S8 – Planning Obligations
- Policy BW1 – Development Proposals,
- Policy EET1 - Employment Allocations in the Cwmbran Area
- Policy BG1 – Locally Designated Sites for Biodiversity and Geodiversity.
- Policy T1 – Transport Improvements.
- Policy T2 – Safeguarding Former Transport Routes.
- Policy T3 – Walking and Cycling Routes.

5.8 A summary of these policies are provided below:

5.9 **Policy S1:** Defines the Urban Boundaries to promote the full and effective use of urban land. Within the defined urban area, there is a presumption in favour of development.

5.10 **Policy S2: Sustainable Development.** Development proposals will need to demonstrate they have taken account of the following principles and where relevant that they: - a) Contribute to the regeneration of existing communities; b) Meet Sustainable transportation and infrastructure priorities and promotion of a sustainable transport hierarchy, including reducing the reliance on the private motor car and encouraging the use of more sustainable modes of transport; c) Conserve and enhance the natural and built environment; d) Promote



the efficient use of land; e) Maximise the efficient use of existing community infrastructure; f) Utilise Sustainable construction techniques; g) Promote sustainable Economic and employment growth; and h) Are located within the Urban Boundary unless it is an acceptable development in the countryside.

- 5.11 **Policy S3: Climate Change.** Development proposals shall seek to mitigate the causes of further climate change and adapt to the current and future effects of climate change; and will be supported where they demonstrate consideration of the following hierarchy of criteria (where appropriate): a) Ensuring that locational decisions are sustainable and avoid areas susceptible to flooding unless justified by national planning policy; b) Achieving Sustainable Design to ensure residual energy requirements are minimised through: - i) Supporting climate responsive development through location, orientation, density, layout, built form, materials and landscaping; ii) Reducing surface water run-off and flood risk through the use of Sustainable Urban Drainage Schemes (SUDS) unless it is shown that these measures are uneconomic or impractical; iii) Promoting water efficiency by reducing the demand for water; and iv) Exploring opportunities to maintain habitat connectivity through the provision of green infrastructure in design; c) Achieving energy efficiency in developments and in line with national standards where required; and d) Utilising renewable and low or zero carbon energy technologies to generate heat and electricity requirements which includes heating, cooling and power networks powered by renewable energy sources, or that connect to existing Combined Heat and Power or communal / district heating networks
- 5.12 **Policy S6:** makes provision for 40.3ha of land for employment and business uses (B1, B2 and B8) and 25ha for strategic regional employment opportunities across the County Borough.
- 5.13 **Policy S7:** relates to the conservation of the natural and historic environment. Development proposals should seek to ensure the conservation and enhancement of the Natural, Built & Historic Environment of Torfaen, in particular including: a) Biodiversity resources; b) Geodiversity resources; c) Water environment; d) Landscape setting; e) Character of the built environment; and f) Historic assets.
- 5.14 **Policy S8:** Planning obligations will be required on development proposals through S106 legal agreements where they are necessary to address the impacts of development and to make the proposal acceptable in land use planning terms.
- 5.15 **Policy BW1:** provides a detailed Borough wide General Policy on Development Proposals covering 'Amenity and Design' (A), the 'Natural Environment' (B), the 'Built Environment' (C), 'Utilities Provision' (D) and 'Design and Transport' (E), against which all planning applications will be determined in conjunction with other relevant LDP policies.
- 5.16 (A) Amenity and Design
- The proposed development must not constitute over development of the site in terms of the scale, density, massing and form of the development.
  - The overall design and appearance of the proposal must take into consideration the local context in terms of siting, appearance, elevation treatment, materials, urban fabric and detailing.

- The proposal should include a landscaping and planting scheme that enhances the site and the wider context including green infrastructure and biodiversity networks and allows it to adapt to climate change;
- The proposal must not have an unacceptable impact upon the amenities of the occupiers of adjoining or neighbouring properties;
- The proposal should promote inclusive design for access into and around the development and design out the opportunity for crime and anti social behaviour.

#### 5.17 (B) Natural Environment

- The proposal must not result in an unacceptable adverse effects in relation to land contamination, the integrity of a European Designated site, a nationally designated site. The proposed development must also not result in the unacceptable loss or harm of landscape features including trees and woodland that have natural heritage or amenity value.

5.18 The supporting text to policy BW1, specifically paragraph 6.1.6 states all developments should in the first instance avoid the loss of biodiversity to contribute to conservation. If loss is acceptable and unavoidable then the loss should be mitigated for. Furthermore, specifically paragraph 6.1.7, in respect of landscape features including river corridors, grassland and woodland are all important in the biodiversity network which should be maintained and enhanced.

#### 5.19 (C) Built Environment

- Where possible, the proposal should contribute to the preservation and enhancement of the historic built environment (including heritage assets and their settings).
- The proposal must not detrimentally affect the character of the immediate and surrounding built environment.

#### 5.20 (D) Utilities Provision

- The proposed development must not prejudice the existing or proposed level of service provision, and
- In areas served by the public foul sewer, planning permission will only be granted where the development can be served by the existing public foul sewerage system or, if the system is inadequate, the statutory undertakers and/or the developers will ensure satisfactory improvements are provided prior to the development becoming operational.

#### 5.21 (E) Design and Transport

- *The proposal should be designed in accordance with the relevant national and local highway design guidance and where appropriate, the Council's adopted parking / cycling provision standards;*

- *The proposal ensures that new access roads within the development layout connect the development to a range of services and facilities and are designed to promote the interests of pedestrians, cyclists and public transport before the private car;*
  - *Where access onto an existing highway is required, the proposal takes account of restrictions relevant to the class of road as designated in the road hierarchy, ensuring movements and speeds are controlled through appropriate design, in order to ensure highway safety and protect amenity;*
  - *The road network is capable of safely and effectively sustaining the scale and nature of additional traffic generated by the proposal and allows for adequate servicing throughout the proposal, with a Transport Assessment being provided where appropriate;*
- 5.22 **Policy EET1:** allocates 16.7ha of Employment Sites the Cwmbran Area, including Policy EET1/4 Llantarnam Park C (1.4ha for B1 uses). The LDP at Paragraph 8.12.4 notes that Llantarnam Park C is an undeveloped area within the existing Llantarnam Industrial Park, which is not visually prominent, and additionally that the design of the unit(s) should match or improve upon adjacent developments.
- 5.23 **Policy BG1:** states that development proposals will not be permitted where they would cause significant adverse effects to local nature conservation designated sites, including the features of a SINCC, unless it can be demonstrated that a) the development could not be reasonably be located elsewhere and the benefits of the proposed development justifiably outweigh the value of the site, and b) adequate mitigatory and/or compensatory provision is made proportionate to the ecological resources lost, or an enhancement to the value of the resources is provided.
- 5.24 **Policies T1 & T2:** wholly relate to specific areas of safeguarded land for the construction of proposed major transport improvement schemes (T1), and safeguarding former transport routes. Whilst not specifically related to the Site, these policies have been included for completeness, if the Site is required to make an appropriate financial contribution towards their implementation.
- 5.25 **Policy T3:** specifically related to land that is safeguarded for walking and cycling routes. The Site itself is not included in the cycle route network 'list' however has been included in the application for completeness.

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## National Planning Policy

### Future Wales: The National Plan 2040 (Adopted February 2021)

- 5.26 **Future Wales: The National Plan 2040 (February 2021)** is the National Development Framework, setting the direction for development in Wales to 2040. The Development Plan sets out 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 wellbeing of our communities.

### Planning Policy Wales (Edition 12: February 2024)

- 5.27 In addition to the TCBC Local Plan, consideration of planning applications should be based upon guidance within Planning Policy Wales (PPW) (edition 12, 2024), and associated guidance within Technical Advice Notes (TANs).
- 5.28 **Planning Policy Wales (Edition 12: February 2024)** sets out the land use planning policies of the Welsh Government and provides an underlying basis for delivering sustainable development with an emphasis on the importance of placemaking. It promotes the development of productive and enterprising places which promotes economic, social, environmental and cultural well-being by providing well-connected employment and economic development in pleasant surroundings.
- 5.29 *Economic Development* – For planning purposes, economic development is defined as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. PPW states that the planning system should ensure that the growth of output and employment in Wales is not constrained by a shortage of land for economic uses and that wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.
- 5.30 *Biodiversity and Ecological Network* – PPW sets out that planning authorities must follow a step-wise approach to maintain and enhance biodiversity and build resilient ecological networks, by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. In considering the weight to be attached to nature conservation interests, PPW states that planning authorities must have regard to the relative significance of international, national and local designations and that differentiation should be given to the relative significance of the designation within the hierarchy. Additionally, PPW encourages planning authorities to protect trees and woodland where they have ecological value, contribute to the character or amenity of a locality, or perform a beneficial and identified green infrastructure function.
- 5.31 *Water and Flood Risk* – PPW states that development should reduce, and must not increase, flood risk on and off development sites, with the priority being to protect the floodplain from development and to prevent the cumulative effects of incremental development. In addition, planning authorities should be aware of the risk of surface water flooding and ensure developments are designed and planned to minimise potential impacts.

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### Technical Advice Notes (TANs)

- 5.32 **TAN 5: Nature Conservation and Planning (2009)** requires local planning authorities to fully consider the effect of planning decisions on biodiversity and ensure that appropriate weight is attached to statutory nature conservation designations, protected species and biodiversity and geological interests within the wider environment. It also considers the potential biodiversity and geological conservation gains which can be secured within developments, including the use of planning obligations.
- 5.33 **TAN 12: Design (2016)** provides guidance on how plan for sustainable buildings, and how to promote sustainability through good design. This TAN places emphasis on the importance of good design and provides guidance on the ways in which it can be achieved through the following factors: inclusive design, public realm, character community safety, environmental sustainability, sustainable means of travel.
- 5.34 **TAN 18: Transport (2007)**. The Technical Advice Note is read in conjunction with Planning Policy Wales. It provides guidance on: Integration of land use and transport planning; location of development; Regional transport plans; Parking and Design of development. It states, *“an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society”*. In terms of Assessing Impacts and Managing Implementation, the Note states *“Developers should be required by local authorities to submit transport assessments to accompany planning applications for developments that are likely to result in significant trip generation”*.
- 5.35 **TAN 23: Economic Development (2014)**: Technical Advice Note Economic Development (2014) enables the Local Authority to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

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## 6. Key Planning Issues

- 6.1 This section expands on the foregoing review of planning policy and considers the key planning issues that are relevant to the development of the site.

### Principle of Development

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3 The Site falls within Torfaen County Borough Council (TCBC) (Cyngor Bwrdeisdref Sirol Torfaen) and at the time of submission, the Statutory Local Development Plan (LDP) for TCBC comprises: Local Development Plan - Written Statement (Adopted 2013) and Proposals Map (for the North and South of the Borough).
- 6.4 This section of the document will assess the proposed development against the above documentation, confirming that the principle of the development is consistent and supported by the development plan.
- 6.5 This application seeks outline planning permission for the following description of development:
- “The erection of a new build, two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking, located at Plot C1 Llantarnam Industrial Park, Cwmbran, Torfaen, NP44 3SE”.*
- 6.6 The Site is allocated for employment, specifically B1 use (Site Allocation Ref: EET1/4 - Llantarnam Park C) in the Local Development Plan and is situated within the well-established Llantarnam Industrial Park. The Site is located within a highly sustainable location in close proximity to the road network, public transport and train service.
- 6.7 Although the proposed development is not wholly in accordance with the allocation, (as Policy EET1/4 Llantarnam Park C for B1 use) the written pre-application response received from Torfaen Borough Council confirmed that the proposal for B1/B2/B8 would facilitate the expansion of the existing adjacent premises and is considered acceptable in principle. The proposed use is in accordance with the established employment area.
- 6.8 Furthermore, the proposed development represents a substantial investment in the area. The investment will enhance the viability and further reinforce economic growth of Llantarnam Park and in Cwmbran. In addition, this development will create a plethora of new jobs through construction and operational phases, which will boost the local economy and overall have a positive economic impact on Cwmbran.



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## Design and Access Statement

- 6.9 The proposed development is supported by a Design and Access Statement produced by Garrett McKee Architects.
- 6.10 The purpose of the document is to outline and explain the principles and concepts that underpin the design as well as layout, scale, landscaping and appearance.
- 6.11 Access to the proposed building will be from Lakeside Road. To help screen and reduce the impact of the service yard, the yard will be positioned either to the side or rear of the building.
- 6.12 The proposed design is sympathetic to its surroundings in the established industrial park. As confirmed by the 'Forward Planning LDP/Policy) Officer, within the written pre-app response *"It [the proposed development] relates well to the existing built form and would utilise existing infrastructure without exceeding capacity.* The proposed building will be steel-framed and will use variety of cladding materials, which is fitting with its location within the industrial park. The new unit will be designed to enhance the building's appearance whilst reducing their visual impact.
- 6.13 An illustrative site layout is shown by drawing ref no PL107. The proposed building will comprise a single storey building with an ancillary two storey office. The Parameters Plan (ref: PL103) notes two areas of maximum proposed building ridge height the first at the site entrance area at 51.00m AOD and the main development area at the heart of the site as 58.00 AOD.
- 6.14 The proposed unit will be designed to have an internal height of 12m, which will enable the installation of modern racking systems, product handling equipment and high-level sprinklers, if required by occupiers.
- 6.15 The proposal is also considerate to the existing landscaping and, where practicable, will preserve and enhance existing planting and habitat.
- 6.16 The LDP at Paragraph 8.12.4 also notes that Llantarnam Park C is an undeveloped area within the existing Llantarnam Industrial Park, which is not visually prominent, and additionally that the design of the unit(s) should match or improve upon adjacent developments. The design of the development as set out in the accompanying Design and Access Statement and supporting plans, is fully sympathetic to the surrounding industrial use and in conclusion is in accordance with the principles of policy BW1(A).
- 6.17 As this is an outline application detailed design is not sought at this stage but nevertheless, in summary, the overall design and appearance of the proposal are suitable for its setting and takes into consideration the local context and materials. The design is sympathetic to its surroundings, and the proposal includes a landscaping strategy (as set out in the DAS). The proposal is therefore fully compliant with Local Plan policy BW1(A). The proposal is also in accordance with Design Technical Advice 12 (2016) as it promotes good design and places emphasis on inclusive design, public realm and environmental sustainability.

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## Flood Risk

- 6.18 A Flood Consequence Assessment and Sustainable Drainage Strategy has been prepared by SBK in support of the application. The report has been prepared to meet the requirements of Planning Policy Wales and TAN 15 (currently suspended pending further consultation).
- 6.19 *Tidal and Fluvial sources* - Online flood mapping indicates the site to be located within Flood Zone 1. Flood Zone 1 is defined as having a low probability of flooding, less than 1 in 1000 annual probability of river or sea flooding. Therefore, the site is at negligible risk of tidal and fluvial flooding, nor will it increase risk off site.
- 6.20 The area immediately adjacent to the east of the site is within Flood Zone 2 (Medium) and Flood Zone 3 (High). It is not proposed to develop in this area, with ground level to remain as existing. Therefore, there will be no increase in risk off site.
- 6.21 *Surface (Pluvial)* – Online flood mapping plans indicate that there is no current flood risk from overland flow. The site has been plateaued for future development and future development levels will ensure surface water flows are directed away from any building and controlled safely on site. Therefore the site is at negligible risk of pluvial flooding nor will it increase risk off site.
- 6.22 *Sewers* – There is no record of sewer flooding on the development plot. The proposed drainage will be designed in accordance with best practice and industry guidance; therefore there will be negligible risk of flooding from sewers. Discharge rates will be restricted to a greenfield equivalent and therefore pose no increased risk off site.
- 6.23 *Groundwater* – Groundwater levels are anticipated to be at a level equivalent to the adjacent Dowlais Brook water level, some 7m below proposed ground level. Therefore the site is at negligible risk of groundwater flooding nor will it increase risk off site.
- 6.24 *Artificial Sources* – There are no major artificial sources of water such as retained waterbodies in the vicinity of the site and therefore flood risk is considered to be negligible from artificial sources, with no increased risk off site.
- 6.25 *Breach of Defences* – The Dowlais Brook does not have any flood defences in the vicinity of the site, therefore no assessment of the consequence of a breach is required.

### *Sustainable Drainage Proposals:*

- 6.26 The following Sustainable Drainage Systems (SuDS) are proposed for the Site:
- Rainwater Harvesting
  - Swales and Gravel Land Drains
  - Pervious Pavements
  - Geo-cellular/ Modular Systems



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- 6.27 In accordance with SAB Standard S6 – Design of Drainage for Construction and Maintenance and Structural Integrity, the various SuDS features will remain privately owned and be maintained by the Development’s Maintenance team.
- 6.28 The SuDS Operation and Maintenance Strategy will be in accordance with CIRIA C753 best practice, as set out in Table 2 of the Flood Consequence Assessment and Sustainable Drainage Strategy.

*Drainage Strategy Surface Water:*

- 6.29 As set out in the SAB Standard S1 – Surface Water Runoff Destination, outlines the surface water drainage discharge should follow the hierarchy: 1. Into the ground (infiltration); 2. To a surface water body; 3. To a surface water sewer, highway drain, or another drainage system; 4. To a combined sewer.
- 6.30 As concluded in the FCCA & SDS, the underlying clay and mudstone strata is not anticipated to be suitable for widescale infiltration. Therefore, the best source of discharge for the proposed development is the nearby Dowlais Brook. The 600 mm diameter outfall that is now in place can be reused, negating the requirement for invasive construction along the riverbank.
- 6.31 According to the SAB Standard S2 - Surface Water Runoff Hydraulic Control, discharge rates should be restricted to values that are as close to greenfield runoff equivalent as is reasonably possible. The Greenfield runoff rate for the site has been calculated using IH124 Methodology. The results are summarised in Table 3 of the FCA & SDS.
- 6.32 The proposed discharge rate of 4.1 l/s offers a betterment of more than 97% when compared to the theoretical brownfield run-off rate (estimated to be 181 l/s in a 50mm/hour intensity storm).
- 6.33 In accordance with SAB Standard S3 – Water Quality, a SuDS treatment train has been included in the proposed drainage strategy. In hardstanding areas this will aim to control the first 5mm event runoff on site.
- 6.34 Through significant pre-application engagement with the SAB, this has led to the development of a SAB compliant proposed drainage strategy.

*Drainage Strategy – Foul Water:*

- 6.35 The proposed foul drainage strategy is to utilise the exiting foul sewer in Lakeside (Glanllyn) Road. A formal S106 connection approval will need to be sought from Welsh Water.
- 6.36 The proposal has also demonstrated that the proposed discharged rate offers a betterment of more than 97% and is therefore in accordance with the ‘Water and Flood Risk’ section of the PPW, which states that that development should reduce, and must not increase, flood risk on and off development sites. In summary, the proposed drainage strategy has been produced in accordance with planning policy, and the proposed development is considered to be in compliance with Policy S3 of the Adopted Local Plan. It has been demonstrated through the Flood and Consequences Assessment that the Site can accommodate four types of Sustainable Drainage Feature.

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## Ecology

- 6.37 An Ecological Assessment has been produced by Ecology Solutions in support of the application.
- 6.38 Ecology Solutions have undertaken baseline ecological investigations and detailed surveys, to evaluate the ecological value of the site and its habitats and species and to determine the necessary ecological mitigation strategies to be incorporated into the design of the proposed development.

### Designated Sites

- 6.39 The nearest European / International designated site is the River Usk / Afon Wysg Special Area of Conservation (SAC) approximately 2.9km south-east of the application site.
- 6.40 There are no statutory designated sites of nature conservation interest located within or immediately adjacent to the application site.
- 6.41 The nearest non-statutory site, measures 3.3ha (Llantarnam ponds LWS) and is located adjacent to the eastern border of the site boundary. Llantarnam ponds is designated on account of the series of ponds which is cited as being good habitat for species including: White clawed Crayfish, Otter, Goosander, Cormorant and Kingfisher. The habitat consists of wet woodland, Ancient Woodland and neutral grassland but also contains the Schedule 9 invasive species Japanese Knotweed and Himalayan Balsam.
- 6.42 Given the close proximity of the Llantarnam Ponds LWS to the application site, it is recommended that a series of standard engineering protocols and best practice guidelines be implemented (in the form of an agreed upon strategy) to ensure potential impacts on any designated sites, including the above reference European designated sites, are entirely avoided.
- 6.43 These should include: Anti-pollution measures; Implementation of 'buffer zones' to control outflow from the site; Control of dust-deposition; Implementation of a sensitive light strategy.

### Habitats

- 6.44 The application site mainly consists of mixed grassland, and woodland habitats. The Dowlais Brook network is located immediately north-east of the application site boundary.
- 6.45 Much of the grassland is of poor quality, comprising tall ruderal vegetative communities and is slowly being lost to Willow and Bramble scrub succession, while the wetter areas of the grassland are of markedly greater quality.
- 6.46 The majority of the woodland habitat located within the application site is of increased ecological value, particularly the areas of woodland (W1) which runs adjacent to the brook. The areas of secondary woodland (W2) are of markedly lower quality (see plan ECO2 withing Ecological Assessment for detail of W1 and W2).
- 6.47 In order to mitigate for the losses of habitats within the application site boundary, high-quality enhancements to the woodland habitats have been recommended, the implementation of which will also aid in an effort to bolster green links throughout the locality.

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6.48 A summary of recommended measures are details in the Ecological Assessment.

Protected Species

6.49 In terms of protected species, the Ecological Assessment concluded:

6.50 **Bats** - It was determined that none of the trees adjacent to the potential development areas (that is, the edges of the woods or hedgerows) contained any features capable to support bat roosts. According to the results of the surveys conducted on bat activity, the majority of bat activity was observed in the nearby forest habitats (mostly W1) and in the regions that bordered them. In the application site's internal grassland, very little activity was seen.

6.51 *Mitigation/Recommendation:* Notwithstanding, to enhance and improve the Site, it is advised that four bat roosting boxes be built on appropriate mature trees in the adjacent woodland. Examples of suitable bat boxes are provided in Appendix 4 of the Ecological Assessment

6.52 **Badgers** – No evidence of Badger activity, including potential setts, was recorded within the application site. On this basis, Badgers are considered to be absent from the application site.

6.53 *Mitigation/Recommendation:* Notwithstanding, on a precautionary basis, the following additional measures are to be implemented during the construction phase of the development, and outlines in a CEMP – Construction and Environmental Management Plan:

- Updated Badger Walkover Survey
- Wherever possible, new excavations (such as trenches) will not be left open overnight. Should excavations be required, scaffolding board (or similar) will be left within the feature in order to provide a means of escape for any animals which may become trapped;
- Where soil bunds (or similar) cannot be avoided, it is recommended that these features are subject to regular checks (daily where possible) in order to identify any areas of digging. Any new excavations will be filled in before a sett is excavated, wherever possible.

6.54 **Birds** – The site offers significant opportunities for nesting birds in the woodland and boundary habitats of the site, with the grassland being of low value to breeding birds. It is recommended that any clearance of grassland, trees or scrub at the Site, be undertaken outside of the main breeding season which runs from March to August, or that an ecologist assesses the area for nesting birds prior to their removal.

6.55 *Mitigation/Recommendation:* In order to provide immediate increases in nesting opportunities to birds, it is proposed that 5 bird nesting boxes be installed within the adjacent woodland boundary habitats. In order to maximise overall effectiveness, a range of designs should be used. The exact position of all boxes will be guided by the appointed Ecologist at the appropriate time. Example bird nesting boxes are shown on Appendix 4 of the Ecological Assessment.

- 6.56 **White-clawed Crayfish** – Given the positive indication of eDNA across the three different sample points, it is considered that White-clawed Crayfish are present within the wider Dowlais Brook.
- 6.57 Based on the results, it is not immediately clear if white-clawed Crayfish are present within a close proximity to the Site.
- 6.58 *Mitigation/Recommendation:* As a precautionary approach, it is recommended that the section of the Dowlais Brook located directly adjacent to the Site be safeguarded entirely as part of the proposed development.
- 6.59 It is also recommended that during construction and operation that the brook be protected from potential contamination, with a suitable buffer.
- 6.60 Following these recommendations, it is considered that any potential impact on White-clawed Crayfish will be avoided.
- 6.61 **Invertebrates** –The Ecological Assessment recommends that the landscaping proposals for the Site incorporate a variety invertebrate targets measures, including: pollen / nectar-rich species to be included in the landscaping areas; retention / provision of deadwood in the buffer / woodland habitats; inclusion of brown / green roofs on areas of built-form.
- 6.62 With the incorporation of the aforementioned measures, it is expected that opportunities for invertebrates will be provided as part of the application submission.
- 6.63 **Other protected or notable species** –
- 6.64 *Mitigation/Recommendation:* Whilst there was no indication of any additional protected or important species within the site during the survey process, it is advised that a subsequent walkover survey of the site be conducted before any site clearance in order to fine-tune any specific mitigation,. Such a requirement would be contained in a CEMP or other document with a comparable wording.
- 6.65 In summary, it is not considered that there are any significant ecological constraints to this site coming forward from an ecological perspective, provided that the mitigations measures recommended in this report are adopted.
- 6.66 Suitable and detailed mitigation measures have been provided for any identified species. The proposed development is therefore considered to be in accordance with part (B) of policy BW1 and its supporting text (para 6.1.6) which seeks to maintain and contribute to biodiversity.
- 6.67 Finally, as set out in Section 2, the Llantarnam Ponds Site of Importance for Nature Conservation (SINC) abuts the eastern boundary of the Site and is located to the east of Dowlais Brook. Policy BG1 seeks to protect the local nature conservation designated sites, including the features of a SINC. The proposed scheme is in accordance with the principles of policy BG1 as the SINC will be protected.

## Trees

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- 6.68 A Tree Constraints Plan and Pre-Development Tree Survey has been produced by BB Trees Ltd to identify the base line position of the site in support of the application.
- 6.69 As identified on the Tree Constraints Plan, individual trees have been identified as: T1 & T2, T5 – T16, T19 - T21, and G22; and four main groups of trees have also been identified, G3, G4, G17 and G18.
- 6.70 No works are required at T1, T2, G3 (although significant growth is expected at G3), G4, T7, T10, T11, T12, T13, T14, T15, T19, T20.
- 6.71 No works are required at present for T5, T6, T8, T9, T16 but the Pre-Development Tree Survey concluded that these should be managed with biodiversity in mind.
- 6.72 Group G17 do not require any works at present. However, the current development zone identified in the parameters plan will extend into this area. Whilst the Applicant will look to retain as many trees as possible, with their associated root protection stand off zone of 5m, within this area, some will need to be removed to accommodate the proposed scheme.
- 6.73 Group G18 would require a root protection area development stand of circa 4.5m from their trunk, if they were to be retained. As with the G17 group of trees the current development zone identified in the parameters plan will extend into this area. Whilst the Applicant will look to retain as many trees as possible, some will need to be removed to accommodate the proposed scheme.
- 6.74 Group G22, has been suggested to be removed as one willow has fallen into the group and is predominantly dead, and lamp post 1720 is entirely engulfed. None of the trees have sufficient room for long term development.
- 6.75 In order to manage the Root Protection Area and tree protection on the Site an Arboricultural Method Statement (AMS) could be secured via condition and submitted prior to any works commencing on the site.
- 6.76 Overall, the aspiration is to only remove those trees as required to deliver the parameters defined development zone. The limited impacts of the proposed removal of the tree will be mitigated with the new landscaping scheme, which will deliver significant planting improvements. The proposed development is therefore considered to be in accordance with Local Plan Policy BW1(B) and National Planning Policy Wales '*Biodiversity and Ecological Network*', which encourage tree and woodland protection where they have ecological value, contribute to the character or amenity of a locality, or perform a beneficial and identified green infrastructure function.

### **Lighting**

- 6.77 Full details of the proposed external lighting and illumination compliance levels can be found in the submitted External Lighting Report. Due to the site's location, it has been assessed as an environmental zone of E2, by the local authority and in accordance with the wider site DCO strategy.

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- 6.78 In summary, the external lighting within the site has been designed to meet illumination levels set out within the client specification, CIBSE Lighting Guide 6 and the British Standards on a horizontal calculation grid.
- 6.79 The lighting design is predicated on a low energy, low pollution, and low maintenance approach. Low-energy products with superior light control optics were also taken into consideration in order to enhance their efficiency, decrease their carbon footprints, and lessen their impact on the surrounding ecology.
- 6.80 During the detailed design stage, alternative light specification may be introduced, however the downward light only principle, should always be retained and implemented into the final design. The proposed scheme is fully compliant with adopted policy BW1(part A) as the downward lighting used will result in the proposal not having an adverse effect on the amenities of adjoining and existing occupiers.

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### **Transport and Access**

- 6.81 A Transport Statement has been produced by DTA, to support the application submission.
- 6.82 The TS confirms that the proposed vehicular access will be provided via Lakeside Road which is accessed from Llantarnam Parkway, via Newport Road. Appropriate tracking has been undertaken for a 16.5m articulated lorry to ensure it can manoeuvre into and out of the site. The tracking is shown on Drawing 25222-01, within the Transport Statement. The TS also confirms there is safe and appropriate pedestrian and cycle provision.
- 6.83 Detailed trip generation figures for B8 use can be found in Tables 4 and 5 within the submitted TS. However, in summary, for B8 trip rates, the site is forecast to generate 13-14 two-way vehicle trips during the morning peak and evening peak. Over a 12-hour period the site is forecast to generate 237 two-way vehicle trips.
- 6.84 Again, detailed trip figures for B2 use can be found in Table 6 and 7 of the submitted TS. However, in summary, for B2 trip rates, the site is forecast to generate 22 two-way vehicle trips during the morning peak and 20 two-way vehicle trips during the evening peak. Over a 12-hour period the site is forecast to generate 195 two-way vehicle trips.
- 6.85 It is concluded that the traffic generation from the development proposals are modest and would not have a material impact on the operation of the local road network, and therefore no junction assessments are required.
- 6.86 The traffic generation of the site confirms that the site will generate minimal vehicular movements onto the local highway network and would not have any material impact on the local highway network. It is considered that the development proposals are in accordance with Policy BW1 Part E Design and Transport (iv) of the Torfaen County Borough Council Local Development Plan.
- 6.87 With regards to parking standards, the development site is considered to be located within Zone 4 – Suburban or Near Urban.
- 6.88 For industrial (B1/B2), non-operational the standards are 1 space per 120sqm - this equates to 42 spaces. For Industrial Warehouse (B8), non-operational, the standards are 1 space per 140sqm – this equates to 36 spaces.
- 6.89 The indicative masterplan for the industrial (B1/B2) includes 32 spaces plus two disabled bays and four EV charging spaces, totalling 38 spaces. The indicative masterplan for the warehouse (B8) use includes 30 spaces plus two disabled spaces and four EV charging spaces, totally 36 spaces.
- 6.90 The proposed car parking provision for the B8 use, has been provided in accordance with the relevant Parking Standards and is therefore in accordance with Policy BW1 Part E Design and Transport (i) of the Torfaen County Borough Council Local Development Plan. The proposed B1/B2 use is 4 spaces short, however this could be overcome with tweaks to the layout at Reserved Matters stage is required.



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**Noise and Air Quality**

- 6.91 The pre-application advice received from Torfaen Council confirmed that the Planning Application, at this Stage, does not need to be accompanied by an Air Quality Assessment or a Noise Impact Assessment.
- 6.92 The Noise and Air Quality Technical Note prepared by TRC, confirms the above. Furthermore, as set out in the Technical Note, while it is not anticipated, where relevant, suitable mitigation measures will be identified in order to reduce potentially adverse effects to an appropriate level.

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## 7. Conclusion

- 7.1 This Planning Statement has been prepared by Lambert Smith Hampton (LSH) on behalf of Opus Land Ltd on behalf of MGTS St John High Income Property ICVC Bank of New York Mellon (International) Ltd (“the Applicant”).
- 7.2 This Statement provides a full summary of the Development Plan policies and material considerations which are considered relevant to the planning application's determination. The description of development that planning permission is being sought, is as follows:
- “The erection of a new build, two-storey unit for use class B1/B2/B8, to provide operational/warehousing space and office accommodation together with associated yards and parking, located at Plot C1 Llantarnam Industrial Park, Cwmbrau, Torfaen, NP44 3SE”.*
- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.4 The Site is allocated for employment, (Site Allocation Ref: EET1/4 - Llantarnam Park C) in the Local Development Plan, and is situated within the well-established Llantarnam Industrial Park.
- 7.5 The proposed Plot C1 development will be a single unit designed to accommodate B1, B2 and B8 use classes. Although the proposed development is not wholly in accordance with the allocation, the Forward Planning (LDP/Policy) Officer at Torfaen Borough Council confirmed within the written pre-application response, that *“the proposal for B1/B2/B8 would facilitate the expansion of the existing adjacent premises, and is considered acceptable in principle.”*
- 7.6 The development will enable the development of a site which has remained vacant for a significant length of time, enabling further economic activity within the area.
- 7.7 The development proposals have been found to accord with the majority of the Development Plan and should therefore be granted planning permission, unless material considerations indicate otherwise.