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Ref: L0001.

Date: 22<sup>nd</sup> March 2024

Dear Sir/Madam

**PROPOSED ERECTION OF 4 CLASS B1/B2/B8 UNITS TOGETHER WITH ASSOCIATED PARKING, NEW ACCESS ARRANGEMENTS and LANDSCAPING AT THE FRONTIER SITE, NEWBRIDGE ROAD INDUSTRIAL ESTATE, PONTLLANFRAITH, NP12 2YN.**

We are instructed by Starburst UK Limited to submit a full planning application for the erection of 4 Use Class B1/B2/B8 units together with associated parking, new access arrangements and landscaping at the Frontier Site, Newbridge Road Industrial Estate, Pontllanfraith, NP12 2YN.

The application comprises the following:

- Application forms duly completed and signed;
- Certificate A and Agricultural Holding Certificate duly completed and signed;
- Proposed Site Plan (Drawing No. 328051-1J)
- Proposed Elevations Plan (Drawing No. 328051-2C)
- Site Location Plan (Drawing No. 328051-3)
- Details of Cycle and Bin Stores (Drawing No. 328051-5)
- Landscape Masterplan (2305-URB-XX-XX-DR-L-001)
- Preliminary Ecological Impact Appraisal (P2488)
- Green Infrastructure Statement (P2488)
- Arboricultural Impact Assessment (ArbTS 715.7)
- Transport Statement (22-00794/TS/01)
- Coal Mining Site Investigation Report (HYG1246 R 240308 SG)
- Noise Impact Assessment (7284/ENS1) and
- Drainage Statement (HYG1246 R 240306 TP)

Please note that the requisite planning application fee of £12,880 is being submitted under separate cover.

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## Site Context

The application site is undeveloped and comprises predominantly bare/made ground together with a substantial belt of perimeter trees along the south, west and east frontages of the site. To the south and west the site is bound by Newbridge Road and an un-named stream, whilst to the east and north are major industrial and retail developments. The site is located within the settlement boundary of Blackwood and within the wider Newbridge Road Industrial Estate. The Development Plan protects the Newbridge Road Industrial Estate for employment use (Policy EM2) and designates it as a Secondary Site in the employment hierarchy.

In terms of the site's surrounding context, this is characterised by predominantly commercial and industrial uses, as would be expected within an industrial estate, together with a Sainsburys superstore and associated petrol station located to the east. Beyond the industrial estate, to the south and west, there is residential development which is largely screened from existing industrial/commercial uses by the perimeter trees bordering the subject site.

As there is currently no vehicular access to the site, it is proposed to provide a new access/egress onto the internal estate road which connects to Newbridge Rd (B4251). This provides direct access to the A4048 to the southeast of the site, along with the A472 just beyond. These two A roads provide good connectivity to both the Sirhowy and Ebbw valleys to the north and across the valleys east and west, as well as connections to the M4 to the south.

On the basis of the mix and siting of existing commercial and residential uses together with the screening afforded by trees bordering the subject site, the proposal is considered appropriate to, and compatible with, the surrounding uses within the industrial estate.

## Planning History

Full planning permission was granted by Caerphilly County Council on the 14th July 2020 (under reference 19/1001/FULL) for a larger (+16%) industrial unit on this site totalling 2500m<sup>2</sup>, compared to 2090m<sup>2</sup> as currently proposed. The scale of the building currently proposed has also been reduced, with the height to ridge and eaves reduced by 1.2m and 2.7m respectively. Furthermore, there is also a material difference between the consented and currently proposed developments in that the consented scheme is sited almost 14m closer to Newbridge Road and 6.5m closer to the site's eastern boundary. As such, it can reasonably be concluded that the previous scheme, found to be acceptable by Caerphilly County Borough Council, was larger than the current proposal – both in terms of floorspace and height and, moreover, was also sited closer to the eastern boundary and the residential properties on the southern side of Newbridge Road.

Subsequent to the above grant of planning permission, the site has been acquired by Starburst Ltd, although it has not been possible for them to implement the subject consent following confirmation that a major surface water culvert runs beneath the north-eastern part of the footprint of the approved industrial building. Without diverting this culvert, which is not a viable option for such a major engineering project, the planning permission granted by the Council in July 2020 is considered to be unimplementable.

## Pre-Application Engagement

Following the above, the applicant engaged in pre-application discussions (reference SPA/23/0093) with Caerphilly County Council, which culminated in a revised proposed site layout which allows for the necessary easement associated with the surface water culvert. The Council has also confirmed that a new full planning application is required to support Starburst's current proposed development at the subject site, which includes a new vehicular site access/egress and the retention of the vast majority of trees on three of the subject site's frontages.

Written feedback was received from Caerphilly County Council on the 21<sup>st</sup> December 2023. This response confirmed that the principle of the current proposed development was acceptable. Support was also offered to the building being orientated parallel to the unit to the north of the site. However, it was also suggested that the east elevation of the proposed building should be revised to add visual interest to the building and provide a definite frontage to it.

## Proposal

The proposal comprises the erection of 2,090sqm of Class B1/B2/B8 development on a 0.31 ha site at the Newbridge Road Industrial Estate. The application proposes the development of up to 4 new units of varying size subject to operator demand. Such flexibility will assist in the marketing and letting of the unit(s). Based on Starburst's extensive development experience throughout South Wales, the proposal is regarded as ideal in meeting the operational requirements of a wide range of Class B1/B2/B8 businesses – an important benefit and material consideration.

Compared to the extant consent, the footprint of the building has been reduced by 16% and the footprint of the building has also been re-positioned/set-back in order not to encroach an 8m easement associated with the surface water culvert running northeast/southwest across the site.

As indicated above, the scale of the building has also been reduced, with the height to eaves and ridge reduced by 1.2m and 2.7m respectively. These, together with the above changes, will lessen the visual impact of the building, as will the retained perimeter trees and proposed new planting.

Traditional cladding in grey matched by blue roller-shutter, single front/rear doors, and rainwater goods are features of the proposal which complement neighbouring buildings in terms of design, scale, materials and colour. Furthermore, in seeking to enhance the design and appearance of the main (east) elevation facing Newbridge Road, glazing has been introduced.

Importantly, not only will the design, materials and proportions of the proposed buildings complement the neighbouring industrial/commercial properties, they also represent a well-trying and tested approach towards "design", which potential Class B1(c)/B2/B8 operators view positively in light of their particular modus operandi. Whereas a Class B1(a) office occupier might favour the extensive use of glazing and/or the use of stone and brick as a major building material, the same would not apply in the case of a typical industrial operator – hence the approach taken not only by Starburst in this case but also evidenced by the approach taken by other developers/operators in the immediate vicinity of the subject site.

To the extent there may be an outstanding concern over the "design" of the proposal and its relationship with its surroundings, our response is as follows – to the north and east are similar industrial/commercial buildings in terms of size, materials and colour. Consequently, there are no grounds for believing the proposal is unacceptable either in terms of its compatibility with these nearby land uses or its impact on visual amenity. Furthermore, to the south and west, the proposed development is screened by existing trees, which proposed new planting will reinforce. Consequently, the nearest residential properties, sited more than 55m away from the proposed building, would not be subject to any significant harm in terms of visual or residential amenity. We find further support for this view when considering any potential impact of the proposal on passing motorists. Given the screening of the development by both trees and new planting and taking into account that only short passing glimpses into the site might be possible, we consider it very unlikely that the proposed development would result in any material harm to the visual amenity of the surrounding area or residential amenity.

A new access/egress onto the adopted highway (the existing internal estate road) is proposed on the site's eastern boundary. Although 3 trees will be lost to facilitate this new access/egress point, 3 replacement trees will be planted elsewhere on the eastern side of the site. Other new planting elsewhere around the perimeter of the site will further mitigate for the loss of the 3 trees referred to.

In terms of parking, one covered cycle store will be provided on site with capacity for 6 bicycles. 18 car parking spaces will also be provided including 2 disabled spaces; 2 electric vehicle charging bays; and 7 bays for heavy goods vehicles – all compliant in terms of the Council's adopted parking guidelines. There will also be space for motorcycle parking.

## Policy

As indicated above, based on the subject site's policy designation credentials, the application proposal is considered to be fully compliant with the objectives of Local Development Plan Policy EM2. The site also benefits from being located within the settlement boundary for Blackwood, with Policy SP5 promoting development within such locations.

Furthermore, the application proposal also accords with Section 5 of Planning Policy Wales which relates to economic development, and the aim of delivering a strong economy and enterprising places across Wales. Consequently, the application proposal is considered to be “full-square” with local and national planning policy aimed at promoting job creation and economic growth – an important material consideration.

Turning to parking-related considerations, the level and nature of provision proposed is considered acceptable in terms of the relevant guidelines. Moreover, the proposed access/egress arrangement is also considered to be compliant with relevant standards.

In terms of design/palette of proposed materials and colour, it is noted that there are residential properties situated to the south and west of the subject site. However, these properties are sited in excess of 55m away from the proposed building and there would also be intervening woodland/trees and/or a highway. Consequently, it is not considered that the proposal would result in any material harm to visual amenity of the surrounding locality or residential amenity. Furthermore, in our view the glazing on the eastern elevation also lifts the appearance of the building beyond that of a standard industrial shed. Overall, the building design is appropriate given the context of the site’s wider character and complements the surrounding industrial/commercial built form. The proposal is therefore considered to comply with Policy CW2 of the Development Plan.

In terms of transport-related matters, a Transport Assessment undertaken by Corun demonstrates how the proposed site access and internal layout has been designed to ensure that all vehicles requiring access will be able enter and exit the site in a forward gear, and safely manoeuvre within the site. In terms of parking-related considerations, the level and nature of provision proposed is considered acceptable in terms of the relevant guidelines. Overall, the report identifies that there are no reasons, in highway and transportation terms, which would restrict the development, with the proposal being regarded as compliant in terms of both national and local planning policy.

Regarding the impact on trees, 4 trees are proposed to be felled. One of these trees is located on the site’s southern boundary and is determined to be of low quality (Category C), and therefore should not constrain development of the site. The three trees to be removed to facilitate the new site access/egress are sited on the site’s eastern boundary. These are identified to be Category B trees, and therefore compensatory tree planting will be provided to mitigate against this loss. Further to this, in line with Local Plan Policy CW6, a tree protection scheme has been provided to ensure that the proposed development can be constructed without any significant long-term adverse impact on the retained trees or the area's amenity provided.

Turning to ecology, Acer Ecology have conducted a preliminary ecological appraisal for the site to determine its baseline ecological position. The report outlines how the site will not generate adverse impacts to statutory or non-statutory nature conservation sites. Further to this, no evidence of water vole, dormice, badgers or reptiles were found on site.

It is acknowledged that two trees, which are proposed to be felled, could have bat roosting potential. For tree referenced T407, it is established that three endoscope surveys will be required between May to September to fully assess their roosting potential. Tree T408 requires a Potential Roost Feature (PRF) Inspection prior to confirming whether the endoscope surveys are also required. It is also recommended that the removal of Trees G3 and G7 will take place between October and February to coincide with the period of lowest bat activity and likelihood of bats being present. Various other recommendations on the site, including the provision of bird and bat boxes; details of which can be secured by condition. Overall, the report concludes that notwithstanding the need for further surveys the site’s ecological value is not considered to represent a fundamental in-principle constraint to the proposed development.

In terms of noise impacts, Hunter Acoustics have undertaken an environmental noise assessment to determine the noise impacts associated with the development proposal. Under the worst-case scenario, it has been determined that both deliveries and garage-related activities on site will generate noises below the existing daytime background noise climate. Overall, the assessment concludes that the noise impacts of this development proposal are acceptable, even when considered on a worst-case scenario basis which, in reality, is deemed unlikely.

The Drainage Statement prepared by Hydrogeo provides details of the method that will be used to discharge the surface water runoff at the site. The SUDS proposed will convey runoff over a grassy filter strip, through a filter drain

and through a grassy detention basin. The SUDS features are recognised to provide certain pollution mitigation characteristics for suspended solids, metals and hydrocarbons, as per the SUDS Manual, and in this configuration will be suitable for the expected runoff. Water will eventually be discharged to the box culvert at an existing chamber within the boundary of the site. No significant adverse effect is expected on the culverted stream following treatment through these SUDS features.

Flood risk at the site is also discussed in the report and the conclusion reached that the risk of flooding from all potential sources (fluvial, tidal and surface water) is considered to be low or not significant (a view reinforced by the box culvert's significant surplus capacity to drain development throughout the Newbridge Road Industrial Estate), with the site unlikely to flood except in very extreme conditions.

The Coal Mining Site Investigation Report prepared by Hydrogeo includes 3 no. boreholes to a maximum depth of 30m to investigate the coal seams and potential mine workings beneath the subject site. Intact coal seams were encountered at 2 of the 3 boreholes and, importantly, no voids or broken ground were identified which might indicate historical mine workings. Moreover, no gas concentrations were encountered and, therefore, the risk to the site from shallow mine workings is considered by Hydrogeo to be low risk. Consequently, it is recommended that the report is issued to the Coal Authority for review of the findings and conclusion that the site can be considered safe, stable, and suitable for development without any mitigation.

A Landscape Masterplan has been prepared by The Urbanists in support of the proposed development. For example, planting at the detention basin is proposed to include an 80/20 feed mix of native wildflower and grass species to meet the SAB biodiversity criteria. The proposed Masterplan also includes a native hedge mix along the southern and eastern frontages of the site together with areas of native shrub planting and the planting of individual specimen native trees. The effective screening of the site by existing trees, particularly from the south and west, will be further reinforced by the planting proposals embodied in the accompanying Landscape Masterplan.

## Conclusions

As indicated above, Caerphilly County Borough Council has previously determined that a larger industrial development than that currently proposed was acceptable when assessed against the relevant planning policy background. Considering there has been no significant change in the planning policy context affecting the subject site during the interim, we conclude that the current proposal is similarly acceptable in principle – the site continues to be an allocated industrial site located within the relevant settlement boundary, with the potential to make an important contribution towards job creation and economic growth. Moreover, the proposal is smaller than the previously consented scheme and is set-back further from the nearest residential properties. Importantly, the current proposal also allows for the easement associated with the culvert and is therefore implementable unlike the previously consented scheme. Consequently, and considering the proposed new planting/landscaping will reinforce the screening of the proposed development, we conclude that the planning balance is even more firmly in favour of the proposed development than was previously the case.

Considering the foregoing, we do not envisage any legitimate reason why planning permission for this proposed investment and development in Pontllanfraith should not be forthcoming. As such we look forward to discussing and progressing matters to a positive outcome. Meanwhile, should you have any queries or require any further information/clarification, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T. Quille', enclosed within a simple, hand-drawn oval border.

Thomas Quille  
Senior Planner

DPP

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