PLANNING SUPPORTING STATEMENT

PROPOSED RECONFIGURATION, ADDITONAL PARKING AND COVERED STORAGE

WASTESAVERS RESOURCE CENTRE

Date: July 2015

Our Ref: JPW0557

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1 INTRODUCTION

Introduction

1.1.1 Wastesavers Recycling Ltd (ñWastesaversò) is proposing to reconfigure and extend its existing recycling depot at Esperanto Way in order to improve operational efficiency, increase throughput and to provide additional parking and covered storage.

1.1.2 The facility will continue to handle the same range of recyclable materials as currently including glass, paper, card, cans, plastics, textiles and food waste.

Purpose of this Statement

1.1.3 This Planning Supporting Statement (PSS) has been produced by RPS on behalf of Wastesavers, as the applicant, to support a planning application for the proposed development.

1.1.4 The PSS provides information to assist Newport City Council (NCC) in determining the planning application and for consultees to be informed about the proposed development.

1.1.5 The application is accompanied by number of technical assessments and other information which should be read in conjunction with the PSS. These are set out in the table below along with a list of the plans submitted with the application.

Table 1-1: Supporting Documents and Assessments

Supporting Information	Purpose
Plans	Site Boundary Plan JPW-0557-004 Site Layout 0557-0004-06 Existing Elevations 0557-0002-05 Proposed Elevations 0557-0002-05 Proposed Roof Plan 0557-0003-07 Topographic Survey RP285-01 Drainage Strategy 200 Rev A Typical Drainage Details 202
Appendix 1 Design and Access Statement	This explains how the design of the proposal has been developed and the access arrangements for the site.
Appendix 2 Ecological Appraisal	This provides an assessment of the potential impacts of the proposed development on ecological interests.
Appendix 3 Ground Conditions Report	This report confirms the current ground conditions at the site.
Appendix 4 Flood Consequences Assessment	This outlines the potential for the site to be impacted by flooding and assesses the impacts of the proposed

Supporting Information	Purpose
	development on flooding in the vicinity of the site.
Appendix 5 Heritage Assessment	This considers potential impacts on archaeology and cultural heritage assets.

Summary of Proposed Development

1.1.6 The application site is 0.87ha in size and is identified on the submitted Site Location Plan. It includes the existing recycling depot and an additional area of 0.28ha to the north east. The additional area is currently vacant land.

1.1.7 It is estimated that the waste throughput of the facility will increase to approximately 20,800 tonnes per annum as a result of the proposed development. The proposed changes include consolidation of existing activities, site reconfiguration, additional covering for external storage, an additional weighbridge and additional parking.

1.1.8 Specifically it comprises:

- A new building for food waste and paper storage and loading with dimensions of 13m x 22.5m and 8m high. This will be a steel framed building with fabric metal cladding similar to the existing building on site;
- An extension to the existing building to be used for cardboard, plastic and can storage and offloading with dimensions of 10.5m x 20m and 5m high. This will also be steel framed with fabric metal cladding similar to the existing building;
- A re-positioned external storage bay for glass, plastic overspill and textiles;
- 19 additional staff car parking spaces plus a motorcycle parking space;
- Reconfiguration of, and increase in, collection vehicle parking to 20 spaces;
- A new one-way circulation route around the site with a new egress onto Esperanto Way; and
- An additional weighbridge at the new egress.

Benefits

1.1.9 The proposed development will result in a number of key benefits including:

- Greater operational efficiency through improved vehicle circulation and parking arrangements;
- Covering of stored recyclables to reduce litter and amenity impacts;
- Enhanced recycling, bulking and storage facilities to enabling higher levels of recycling to be achieved;

- An associated increased contribution towards the ability of NCC to meet its statutory waste targets and avoid fines;
- Additional staff parking which will remove the need for on-street parking; and
- The beneficial re-use of a vacant area of brownfield land.

The Applicant

1.1.10 Wastesavers are a third sector organisation running a range of environmental and social services in South Wales. A key element of their work is running the award winning kerbside recycling services for Newport in partnership with NCC.

1.1.11 Wastesavers also operate commercial recycling services for more than 300 businesses across Newport, Cardiff and Monmouthshire, provide IT recycling and disposal services for companies across Wales and run professional training and apprenticeship programmes.

1.1.12 In addition, the Wastesavers charity runs the Reuse Super Centre in Phoenix Park, Newport and the PEAK 14-18 Programme which works with young people who struggle with mainstream education. It also provides educational packages for schools.

Statement Summary

1.1.13 The following sections of this statement address the following matters:

- A description of the site and its surroundings (Section 2);
- A description of the proposed development (Section 3);
- A description of the planning policy context and an analysis of how the development fits within this context (Section 4); and
- Conclusions (Section 5).

2 THE SITE AND ITS SURROUNDINGS

Site Description

2.1.1 The application site is located on Esperanto Way within an existing industrial estate approximately 1.8km to the south east of Newport City Centre.

2.1.2 The site is centred at Ordnance Survey grid reference SN 517578 (postcode NP19 0RD). The Site Location Plan shows the site's location in the context of the immediately surrounding area.

2.1.3 The site is 0.87ha in area and comprises the existing Wastesavers Recycling Depot together plus an additional area of currently vacant land to the north east that is 0.28ha in size.

2.1.4 Access to the site is via the existing access to Wastesavers Recycling Depot off Esperanto Way.

Site Surroundings

2.1.5 To the south of the application site is an area of scrub and a drainage lagoon. To the west is the River Usk which is separated from the site by an area of scrub. To the east and north of the site are industrial premises.

2.1.6 The wider area is mainly industrial in nature.

Access and Rights of Way

2.1.7 There are no public rights of way crossing the site

Site History

2.1.8 The existing recycling depot was constructed on the site over 10 years ago. Prior to its development as a recycling depot, the site was open land servicing the adjacent industrial operations as an area of slag/refuse deposition and in part as a railway track route servicing the Orb Iron Works (now Orb Electrical Steels).

Planning History

2.1.9 The planning history relevant to the site is set out below.

Table 1-2 Planning History

04/0353	ERECTION OF RECYCLING FACILITY WITH ASSOCIATED OFFICE ACCOMMODATION (AMENDMENT TO PLANNING PERMISSION 03/0592	Granted with Conditions
03/0592	ERECTION OF NEW RECYCLING FACILITY WITH ASSOCIATED OFFICE ACCOMMODATION ON	Granted with Conditions

	MEZZANINE	

3 PROPOSED DEVELOPMENT

Background

3.1.1 In 2013/14 Newport City Council (NCC) achieved an indicative recycling rate of 52%. However, challenging statutory targets have been set by Welsh Government (WG). In response to these targets NCC is currently undertaking a holistic recycling and waste service review and is considering how to reduce the amount of municipal waste produced in Newport and how to increase the reuse and recycling of that which is produced.

3.1.2 Wastesavers works in partnership with NCC to deliver recycling services. Wastesavers operate a weekly kerbside collection of paper, cans, plastic, glass, textiles, small domestic appliances and food waste. Dry recyclables collected by Wastesavers from households, flats and business are bulked at the depot on Esperanto Way the subject of this application.

3.1.3 The depot was built over 10 years ago when the recycling rate was only 25%. The site currently handles around 14,600 tonnes of materials including paper, glass, food, plastic, steel and aluminium cans and cardboard. The site currently has bulking and baling facilities as well as machinery to sort steel and aluminium cans.

3.1.4 The need to handle a greater amount of material, in order to meet WG targets and deal with an expanding housing stock has resulted in the purchase of some additional land neighbouring the current depot to provide additional parking, covered storage and improved circulation, all of which will increase the operational efficiency of the depot.

Proposed Development

3.1.5 The application site is 0.87ha in size and is identified on the submitted Site Location Plan. It includes the existing recycling depot and an additional area of 0.28ha to the north east. The additional area is currently vacant land.

3.1.6 It is estimated that the waste throughput of the facility will increase to approximately 25,000 tonnes per annum as a result of the proposed development. The proposed changes include consolidation of existing activities, site reconfiguration, additional covering for external storage, an additional weighbridge and additional parking.

3.1.7 Specifically it comprises:

- A new building for food waste and paper storage and loading with dimensions of 13m x 22.5m and 8m high. This will be a steel framed building with fabric metal cladding similar to the existing building on site;

- An extension to the existing building to be used for cardboard, plastic and can storage and offloading with dimensions of 10.5m x 20m and 5m high. This will also be steel framed with fabric metal cladding similar to the existing building;
- A re-positioned external storage bay for glass, plastic overspill and textiles;
- 19 additional staff car parking spaces plus a motorcycle parking space;
- Reconfiguration of, and increase in, collection vehicle parking to 20 spaces;
- A new one-way circulation route around the site with a new egress onto Esperanto Way; and
- An additional weighbridge at the new egress.

Traffic, Access and Parking

3.1.8 The site is located within an established industrial area and as such is serviced by purpose built industrial estate roads which are considered suitable for the continued use of the site as a recycling depot.

Access

3.1.9 The site is currently accessed from a single access point onto Esperanto Way. The proposal is to create a one-way circulation system within the site such that vehicles enter the site through the existing access and leave the site via a new egress onto Esperanto Way. This is illustrated on the Site Layout Plan.

Traffic

3.1.10 The proposed development plus a number of other operational changes will allow for more efficient delivery and collection of recyclables to and from the depot. These will include the use of collection vehicles with increased payloads (i.e. the site will be able to be serviced by larger recycling vehicles).

3.1.11 As a result of this the proposed development, although facilitating the increase in throughput from 14,600 tonnes per annum to 20,800 tonnes per annum, will only result in a negligible increase in HGV traffic servicing the depot. The increase in such vehicles will be from the current average of 37 HGVs (76 two way movements) to 44 HGVs (88 two way movements).

3.1.12 The basis for the calculated increase in traffic levels is set out below in Tables 1-3 and 1-4 below.

Table 1-3 Waste Streams, Tonnage and Vehicle Numbers

Waste Type	Current Vehicle Nos. (per month)	Current Vehicle Carrying Capacity (Tonnes)	Current Waste Quantity (Tonnes)	Future Vehicle Nos. (per month)	Future Vehicle Carrying Capacity (Tonnes)	Future Waste Quantity (Tonnes)
Deliveries						
Mixed recycling	762	1.6	1219	868	2	1736
Collections						
Paper	11	26	283	12	26	312
Glass	18	17	300	13	26	330
Food	19*	26	383	19	26	498
Plastic	8	20	163	13	20	211
Steel	3	17	46	3	20	60
Aluminium	2	12	19	2	16	25
Card	1	20	25	15	20	300
Sub-Total Collections	**59**		**1226**	**78**		**1743**

*Currently food collections take place daily regardless of the quantity of materials in the vehicles. Proposed collections will take place at the same frequency as increased tonnages can be accommodated within the vehicle capacity.

Table 1-4 Waste and Vehicle Numbers Summary Table

Annual Tonnages	17418	25079
Total No. of Vehicles per year	9851	11357
Total No. Of Vehicles per month	821	946

Total No. of Movements per month	1642	1893
Total No. of vehicles per day	38	44
Total No. of Movements per day	76	88

Parking

3.1.13 There is existing parking on site for staff and for Recycling Collection Vehicles to allow them to be parked overnight. There are currently 42 parking spaces for staff including one disabled space and cycle parking for 20 bicycles. The level of parking is currently insufficient for the staff on site. This results in staff parking on Esperanto Way.

3.1.14 A key element of the proposal is to provide an additional 19 staff parking spaces on site to minimise the need for on-street parking. The existing cycle parking will be relocated as part of the proposal and a space designated for motorcycle parking will be provided.

3.1.15 The proposed layout also provides for a total of 20 spaces for overnight parking of the collection vehicles.

Staffing

3.1.16 The existing recycling depot has 20 office staff including four part-time staff and four who work 75% of the time off-site. There are also 45 operational staff of whom 40 are drivers with the remainder working on-site. Current operating hours are 7.30 ï 5pm.

3.1.17 There is likely to be an increase of 5-6 operational staff as a result of the proposed development.

Hours of Operation

3.1.18 In addition to the physical works at the depot the subject of this application, it is proposed that the operating hours are increased to 7.00ï 17.30 including the Saturdays following Bank Holidays. The facility will be closed on bank holidays including Christmas Day, Boxing Day and New Yearôs Day.

Environmental Permit

3.1.19 In addition to planning permission, the development will require an Environmental Permit from Natural Resources Wales (NRW). This will set out environmental standards for the operation of the facility, mainly relating to the control of air and noise emissions, drainage and site management. It will of necessity be considerably more defined and technical than the planning application.

4 PLANNING POLICY ANALYSIS

Introduction

4.1.1 This section of the report sets out the national and local planning policy context and then analyses the suitability of the proposed development having regard to that context.

National Planning Context

4.1.2 The Welsh Governmentôs national planning policy is set out in Planning Policy Wales and is supplemented by further advice contained with topic specific Technical Advice Notes.

Planning Policy Wales (PPW) Edition 7 (July 2014)

4.1.3 Sections 12.5, 12.6 and 12.7 of PPW deal with the Welsh Governmentôs (WG) waste policies with regard to managing waste, development plans and waste and development management and waste.

4.1.4 Paragraph 12.5.1 of PPW states that the WGôs general policy for waste management is contained in its overarching waste strategy document Towards Zero Waste and the associated Sector Plans. It confirms that planning authorities should, in principle, be supportive of facilities which fit with the aspirations of those documents and in doing so reflect the priority order of the waste hierarchy as far as possible.

4.1.5 Paragraph 12.5.2 of PPW confirms that the Collections, Infrastructure and Markets (CIM) Sector Plan indicates a move towards a position where disposal and recovery options for waste are reduced in favour of high volume source segregated collection followed by reprocessing and that there is a need for planning authorities to facilitate the provision of a wide ranging and diverse waste infrastructure in order to meet the WGôs aspirations for waste management and paragraph 12.5.3 confirms that the land use planning system has an important role to play in facilitating sustainable waste management.

4.1.6 Paragraph 12.5.4 then confirms that the waste hierarchy provides the key starting point for all types of waste management proposals set against the wider social, economic and environmental considerations relevant in any given case.

4.1.7 Paragraph 12.7.1 of PPW confirms that decisions on waste management proposals should be determined in accordance with the relevant development plan for an area with the extent to which a proposal demonstrates a contribution to the waste management objectives contained in national waste policy being a material planning consideration.

Technical Advice Note (TAN) 21: Waste (2014)

4.1.8 TAN 21 provides technical advice on how the land use planning system should contribute towards sustainable waste management and resource efficiency, reflecting the new waste management

drivers at a European Union and Wales level. The Welsh Governmentôs overarching waste strategy for Wales, ôTowards Zero Waste - One Wales: One Planetô sets out a long term framework for resource efficiency and waste management in Wales up until 2050.

4.1.9 Paragraph 1.24 of TAN 21 confirms that all types of waste should be managed sustainably and that the Waste Framework Directive (WFD) places particular obligations on Member States with regard to infrastructure for waste disposal and infrastructure for the management of mixed municipal waste, and establishes preparation for reuse and recycling targets for a number of materials including paper, metal, plastic and glass. As such, TAN 21 confirms that the CIM Sector Plan identifies these materials as being priority materials for recycling as well as card and food.

4.1.10 Paragraph 2.2 of TAN 21 confirms that there are clear environmental, economic and social benefits associated with managing waste as a resource and optimising efficiency of use of waste material. It also confirms that the expanding waste management sector can offer job and training opportunities and safeguard existing jobs as a result of cost savings associated with increased resource efficiency.

4.1.11 TAN 21 describes the waste hierarchy with paragraph 2.7.3 advising that where it is not possible to reuse materials and products or prepare them for reuse, recycling should be encouraged and that priority should be given to the development of new infrastructure that promotes high quality, closed loop recycling, or upcycling where feasible, with a focus on dealing with separately collected materials.

4.1.12 Like PPW, TAN 21 also confirms that decisions in relation to waste management facilities should be taken in accord with the relevant development plan for the area and take into account national waste policy (paragraph 4.1).

4.1.13 Finally, paragraph 4.60 of TAN 21 confirms that transfer stations are of significant importance to all sectors because they serve to manage the flow of waste more effectively and can reduce overall reliance upon landfill as the capture of recyclable materials increases.

Technical Advice Note 15: Development and Flood Risk (July 2004)

4.1.14 The site lies within Flood Zone C1 as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15 (TAN15). Zone C1 is a flood zone that is served by significant infrastructure, including flood defences.

4.1.15 In this context the application is required by Section 6 of TAN 15 to provide justification that the consequences of the proposed development are appropriate in flood risk terms via the submission of a Flood Consequences Assessment (FCA) (Appendix 4) that demonstrates that the risks and consequences of flooding can be managed over the lifetime of the development.

4.1.16 An FCA has been submitted with the application and its conclusions are set out later in this report.

Development Plan Context

4.1.17 The extant development plan for the area within which the application site is located is the Newport Local Development Plan 2011-26 which was adopted in January 2015.

Newport Local Development Plan 2011-26 (January 2015)

4.1.18 Pre-application advice in relation to the proposed development was sought from Newport City Council. The Council's pre-application advice was set out in a letter dated 14th July 2015. This letter confirmed that the policies of the Local Development Plan (LDP) against which the application would be considered were Policies EM3 (Alternative Uses of Employment Land), SP3 (Flood Risk), SP9 (Conservation of the Natural, Historic and Built Environment), SP20 (Waste Management), GP4 (Highways and Accessibility), GP6 (Quality of Design), CE6 (Archaeology), W1 (Sites for Waste Management Facilities) and W2 (Waste Management Proposals).

4.1.19 The context provided by those policies is set out below.

Policy EM3 (Alternative Uses of Employment Land) states:

DEVELOPMENT PROPOSALS PROMOTING ALTERNATIVE USES ON EXISTING EMPLOYMENT SITES WILL BE RESISTED UNLESS:

i) THE SITE HAS BEEN MARKETED UNSUCCESSFULLY FOR EMPLOYMENT PURPOSES FOR A MINIMUM OF 12 MONTHS;

ii) THERE REMAINS A SUFFICIENT RANGE AND CHOICE OF EMPLOYMENT LAND AND PREMISES TO MEET LDP REQUIREMENTS AND LOCAL DEMAND;

iii) THE DEVELOPMENT HAS NO ADVERSE IMPACT ON EXISTING OR ALLOCATED EMPLOYMENT SITES;

iv) THE DEVELOPMENT HAS NO ADVERSE IMPACT ON AMENITY OR THE ENVIRONMENT.

4.1.20 The application site is within an area that is industrial in character and is accordingly allocated as employment land in the LDP. As such Policy EM3 is relevant. However, insofar as the development proposal only seeks to improve and extend the existing use of the site for waste management purposes it should be noted that Policy W1 of the LDP confirms that such uses are suitable on industrial sites.

Policy W1 (Sites for Waste Management Facilities) states:

ALL ALLOCATED, PERMITTED AND EXISTING B2 INDUSTRIAL SITES ARE IDENTIFIED AS POTENTIALLY SUITABLE LOCATIONS FOR NEW WASTE MANAGEMENT FACILITIES SUBJECT TO DETAILED ASSESSMENTS.

4.1.21 In terms of the Council's strategic policy for waste, Policy SP20 (Waste Management) states:

THE SUSTAINABLE MANAGEMENT OF WASTE ARISINGS IN NEWPORT WILL BE FACILITATED BY PROMOTING AND SUPPORTING ADDITIONAL TREATMENT FACILITIES, THAT HAVE REGARD TO

THE WASTE HIERARCHY, THE PROXIMITY PRINCIPLE AND CONTRIBUTE TO AN INTEGRATED NETWORK OF FACILITIES.

4.1.22 Paragraph 2.84 of the supporting text to the policy confirms that planning authorities are required by European Directives and national guidance to ensure that waste is recovered or disposed of without harming the environment, whilst also meeting stringent waste related targets and that the choice of waste management option for a particular waste stream will be guided by the policy principles established in TAN21, with particular reference to the waste hierarchy.

4.1.23 The specific policy context for the consideration of waste management proposals is provided by Policy W2 (Waste Management Proposals). This states:

DEVELOPMENT PROPOSALS FOR SUSTAINABLE WASTE MANAGEMENT FACILITIES WILL BE PERMITTED PROVIDED THAT:

i) THE PROPOSAL WOULD NOT RESULT IN AN UNACCEPTABLE HARM ON NATURE CONSERVATION INTERESTS OR OF ARCHAEOLOGICAL OR GEOLOGICAL IMPORTANCE,

ii) THE RISKS AND CONSEQUENCES OF FLOODING CAN BE ACCEPTABLY MANAGED,

iii) THE PROPOSAL IS OF A HIGH QUALITY DESIGN AND WOULD NOT RESULT IN AN UNACCEPTABLE IMPACT ON LANDSCAPE QUALITY,

iv) THERE IS NO IMPACT ON AMENITY THROUGH NOISE, AIR POLLUTION, ODOURS, DUST AND EMISSIONS THAT CANNOT BE APPROPRIATELY CONTROLLED BY MITIGATING MEASURES.

v) THE DEVELOPMENT WOULD NOT RESULT IN UNACCEPTABLE HARM TO HEALTH,

vi) THE TRAFFIC GENERATED CAN BE ACCOMMODATED SAFELY ON THE EXISTING HIGHWAY NETWORK OR SUITABLE ARRANGEMENTS ARE MADE FOR THE TRANSPORTATION OF WASTE BY RAIL,

vii) THE NEED FOR PROPOSALS FOR DISPOSING OF THE TYPE, QUANTITY AND SOURCE OF WASTE ASSESSED AGAINST REQUIREMENTS BEING ESTABLISHED.

4.1.24 Paragraph 11.4 of the LDP confirms that Policies W1 and W2 accord with TAN21, The National Waste Strategy for Wales: Wise About Waste (2002), Towards Zero Waste - One Wales: One Planet (June 2010) and the Collections, Infrastructure and Markets Waste Sector Plans (July 2012).

4.1.25 Paragraph 11.6 confirms that, in accordance with national guidance, in-building waste facilities will generally be encouraged towards existing general industrial areas (Use Class B2), unless it can be demonstrated that they could be acceptably located elsewhere, or if an assessment indicates that more onerous locational standards should apply. This paragraph also confirms that advances in technology and the introduction of new legislation, policies and practices mean that many modern waste management/resource recovery facilities on the outside look no different to many other modern industrial processes in terms of their operation and impact.

4.1.26 The remaining policies identified by the Council as being relevant to the consideration of the proposed development relate to more specific matters, all of which are listed as criteria in Policy W2 above.

Policy SP3 relates to flood risk and states:

NEWPORT'S COASTAL AND RIVERSIDE LOCATION NECESSITATES THAT DEVELOPMENT BE DIRECTED AWAY FROM AREAS WHERE FLOOD RISK IS IDENTIFIED AS A CONSTRAINT AND ENSURE THAT THE RISK OF FLOODING IS NOT INCREASED ELSEWHERE. DEVELOPMENT WILL ONLY BE PERMITTED IN FLOOD RISK AREAS IN ACCORDANCE WITH NATIONAL GUIDANCE. WHERE APPROPRIATE A DETAILED TECHNICAL ASSESSMENT WILL BE REQUIRED TO ENSURE THAT THE DEVELOPMENT IS DESIGNED TO COPE WITH THE THREAT AND CONSEQUENCES OF FLOODING OVER ITS LIFETIME. SUSTAINABLE SOLUTIONS TO MANAGE FLOOD RISK SHOULD BE PRIORITISED.

Policy SP9 relates to conservation of the natural, historic and built environment and states:

THE CONSERVATION, ENHANCEMENT AND MANAGEMENT OF RECOGNISED SITES WITHIN THE NATURAL, HISTORIC AND BUILT ENVIRONMENT WILL BE SOUGHT IN ALL PROPOSALS.

Policy GP4 sets out general development principles for highways and accessibility and states:

DEVELOPMENT PROPOSALS SHOULD:

i) PROVIDE APPROPRIATE ACCESS FOR PEDESTRIANS, CYCLISTS AND PUBLIC TRANSPORT IN ACCORDANCE WITH NATIONAL GUIDANCE;

ii) BE ACCESSIBLE BY A CHOICE OF MEANS OF TRANSPORT;

iii) BE DESIGNED TO AVOID OR REDUCE TRANSPORT SEVERANCE, NOISE AND AIR POLLUTION;

iv) MAKE ADEQUATE PROVISION FOR CAR PARKING AND CYCLE STORAGE;

v) PROVIDE SUITABLE AND SAFE ACCESS ARRANGEMENTS;

vi) DESIGN AND BUILD NEW ROADS WITHIN PRIVATE DEVELOPMENT IN ACCORDANCE WITH THE HIGHWAY AUTHORITY'S DESIGN GUIDE AND RELEVANT NATIONAL GUIDANCE;

vii) ENSURE THAT DEVELOPMENT WOULD NOT BE DETRIMENTAL TO HIGHWAY OR PEDESTRIAN SAFETY OR RESULT IN TRAFFIC GENERATION EXCEEDING THE CAPACITY OF THE HIGHWAY NETWORK.

Policy GP6 sets out general development principles relating to the quality of design and states:

GOOD QUALITY DESIGN WILL BE SOUGHT IN ALL FORMS OF DEVELOPMENT. THE AIM IS TO CREATE A SAFE, ACCESSIBLE, ATTRACTIVE AND CONVENIENT ENVIRONMENT. IN CONSIDERING DEVELOPMENT PROPOSALS THE FOLLOWING FUNDAMENTAL DESIGN PRINCIPLES SHOULD BE ADDRESSED:

i) CONTEXT OF THE SITE: ALL DEVELOPMENT SHOULD BE SENSITIVE TO THE UNIQUE QUALITIES OF THE SITE AND RESPOND POSITIVELY TO THE CHARACTER OF THE AREA;

ii) ACCESS, PERMEABILITY AND LAYOUT: ALL DEVELOPMENT SHOULD MAINTAIN A HIGH LEVEL OF PEDESTRIAN ACCESS, CONNECTIVITY AND LAID OUT SO AS TO MINIMISE NOISE POLLUTION;

iii) PRESERVATION AND ENHANCEMENT: WHERE POSSIBLE DEVELOPMENT SHOULD REFLECT THE CHARACTER OF THE LOCALITY BUT AVOID THE INAPPROPRIATE REPLICATION OF NEIGHBOURING ARCHITECTURAL STYLES. THE DESIGNER IS ENCOURAGED TO DISPLAY CREATIVITY AND INNOVATION IN DESIGN;

iv) SCALE AND FORM OF DEVELOPMENT: NEW DEVELOPMENT SHOULD APPROPRIATELY REFLECT THE SCALE OF ADJACENT TOWNSCAPE. CARE SHOULD BE TAKEN TO AVOID OVER-SCALED DEVELOPMENT;

v) MATERIALS AND DETAILING: HIGH QUALITY, DURABLE AND PREFERABLY RENEWABLE MATERIALS SHOULD BE USED TO COMPLEMENT THE SITE CONTEXT. DETAILING SHOULD BE INCORPORATED AS AN INTEGRAL PART OF THE DESIGN AT AN EARLY STAGE;

vi) SUSTAINABILITY: NEW DEVELOPMENT SHOULD BE INHERENTLY ROBUST, ENERGY AND WATER EFFICIENT, FLOOD RESILIENT AND ADAPTABLE, THEREBY FACILITATING THE FLEXIBLE RE-USE OF THE BUILDING. WHERE EXISTING BUILDINGS ARE PRESENT, IMAGINATIVE AND SENSITIVE SOLUTIONS SHOULD BE SOUGHT TO ACHIEVE THE RE-USE OF THE BUILDINGS.

GP7 General Development Principles ï Environmental Protection and Public Health

DEVELOPMENT WILL NOT BE PERMITTED WHICH WOULD CAUSE OR RESULT IN UNACCEPTABLE HARM TO HEALTH BECAUSE OF LAND CONTAMINATION, DUST, INSTABILITY OR SUBSIDENCE, AIR, HEAT, NOISE OR LIGHT POLLUTION, FLOODING, WATER POLLUTION, OR ANY OTHER IDENTIFIED RISK TO ENVIRONMENT, LOCAL AMENITY OR PUBLIC HEALTH AND SAFETY.

Finally, **Policy CE6** relates to archaeology and states:

DEVELOPMENT PROPOSALS WILL NORMALLY BE REQUIRED TO UNDERTAKE AN ARCHAEOLOGICAL IMPACT ASSESSMENT BEFORE THE PROPOSAL IS DETERMINED:

i) WHERE GROUNDWORKS AND/OR THE INSTALLATION OF SERVICES ARE PROPOSED WITHIN THE ARCHAEOLOGICALLY SENSITIVE AREAS OF CAERLEON, THE LEVELS, LOWER MACHEN AND THE CITY CENTRE, OR;

ii) WITHIN OTHER AREAS OF RECOGNISED ARCHAEOLOGICAL INTEREST.

Other Material Considerations

4.1.27 The Councilôs pre-application advice letter of 14th July 2015 also stated that the Council does not currently have any adopted parking standards. It indicated, however, that the Newport Parking Standards 2012 do carry some weight in the determination of planning applications.

Principle of Development

4.1.28 The proposed development seeks to reconfigure an existing recycling depot and provide some additional parking and covered segregated recycling storage areas to improve the efficiency and increase the quantum of recyclable materials that can be dealt with.

4.1.29 The depot will continue to facilitate the WG priority materials glass, paper, cans and plastics as well as textiles, card and food waste and it is estimated that due to the proposed changes the waste throughput of the facility will increase from 14,600 tonnes per annum to approximately 20,800 tonnes per annum.

4.1.30 The proposal therefore accords with national waste policy contained within Section 12 of PPW and TAN 21 by facilitating an increase in recycling in accordance with the waste hierarchy.

4.1.31 National waste policy is reflected in the Newport LDP by Policy SP20. This policy seeks to facilitate sustainable management of waste in Newport by promoting and supporting additional facilities that have regard to the waste hierarchy, the proximity principle and contribute to an integrated network of facilities. The proposed development therefore also accords with Policy SP20.

4.1.32 It is recognised that the application site is located within an area that is industrial in character and is allocated as employment land in the LDP. However, whilst Policy EM3 of the LDP seeks to control the introduction of alternative uses on employment land, the development proposal merely seeks to improve and extend the existing use of the site for waste management purposes. In this regard Policy W1 of the LDP confirms that such uses are suitable on industrial sites such as the application site. In addition, the proposal has employment benefits as it will ensure that those who are currently employed at the facility will be retained in employment and will also result in the creation of an additional 5ï 6 jobs at the premises.

4.1.33 Indeed, the Councilôs pre-application advice confirmed that in principle, the development of the site as proposed is in accordance with the aims and objectives of the LDP and that the development is justified.

4.1.34 It is recognised that this acceptance of the principle of the development is subject to consideration of detailed matters and this consideration is set out in the following paragraphs.

Environmental and Other Considerations

4.1.35 Policy W2 sets out the Councilsôcriteria for considering the suitability of proposals for sustainable waste management facilities and, as such, it is these that are used below to demonstrate the acceptability of the proposed development with reference made to other issue specific policies and to national policy where relevant. In doing this it is noted that the Councilôs pre-application advice as well as accepting the principle of the development proposal, also indicated that due to the proximity of the River Usk SAC and SSSI, the key issues for the application were likely to relate to ecology, contamination and flooding.

4.1.36 Policy W2 seeks to permit proposals such as the application proposal as long as the criteria identified within the policy are considered acceptable. These are considered in the following paragraphs.

4.1.37 Nature conservation ï the Councilôs Ecologist contributed to the pre-application advice received and confirmed that a Phase 1 Ecology Survey, a Reptile Survey and an Invertebrate Survey were required to be submitted with the application. These surveys have been undertaken and they are reported within the Ecological Appraisal Report (Appendix 2)

4.1.38 The Ecological Appraisal Report concludes as follows:

4.1.39 In terms of ecological designations, the River Usk SAC and SSSI lie 20m to the northwest of the site however detrimental effects on species for which the sites are designated or on the overall status of the sites are unlikely. Furthermore, any potential for construction and operational activities to impact on the sites can be appropriately addressed when the methods for construction and drainage design have been finalised.

4.1.40 With regard to habitats within the application site, these are largely restricted to the proposed extension area and overall they are naturally regenerating habitats that are common on brownfield sites and are classified as having conservation value in a local context only. There is however adjacent scrub habitat that forms an important buffer between the site and the River Usk SAC/SSSI and disturbance of the scrub habitat outside of the application site should be avoided.

4.1.41 With regards to species, the north-western boundary of the extension site is a potential commuting route/ foraging habitat for bats so site lighting design should be sensitive and avoid creating additional light spill onto the scrub habitat to maintain its potential value as a bat flight line.

4.1.42 The site is considered to have negligible value for otters,

4.1.43 No birds are nesting within the site and there would be no loss of nest sites as a result of the development but that there would be a local reduction in foraging areas although it is unlikely that this small reduction in foraging area would result in a decline in the population of any of the species resident in the industrial estate and wider dock area.

4.1.44 The pond 90m to the south west of the application site is considered very unlikely to support great crested newt as it is used as a balancing pond for the wider industrial area and, as a consequence of this, is likely to be polluted.

4.1.45 The site has features of potential value for common species of reptile (common lizard and slow worm) with dense cover in the boundary vegetation and refuge spaces in the rubble mound, which will also have the potential to be used for hibernation. However, as much of the surroundings comprise built-up areas within the Industrial Estate which act as a partial barrier to movement they reduce the potential for colonisation at the site. Reptile species were not recorded during the survey and, as such, and because the site is relatively small this gives high confidence of their absence from the application site.

4.1.46 In terms of invertebrates the survey found a good species diversity in the proposed extension area with the main value of the site for invertebrates relating to the bare ground with sparsely ruderal vegetation. It is recommended that some measures, where possible, are taken to maintain features that would be used by invertebrates in the completed development. In this regard, and based on the nature of the development and the space required to achieve the required site operations within what is a small site, it is recommended that land around the boundary should be planted with herbaceous species that will provide food for bees and moths.

4.1.47 Given the proximity of the River Usk SAC and SSSI to the site it is noted that the Councilõs pre-application advice indicated that it may need to undertake Appropriate Assessment of the proposals in order to be sure that any potential impacts on the special features of the SAC and SSSI can be suitably mitigated. It is considered that the ecological information supplied with the application provides sufficient information in this regard.

4.1.48 In summary, having regard to the conclusions of the survey work undertaken and taking into account the proximity of the River Usk SAC and SSSI, the proposal would not have an unacceptable impact upon nature conservation interests and as such it accords with Policies W2 and SP9.

4.1.49 Archaeology ï the site adjoins an area identified as being archaeologically sensitive in the LDP. However, Glamorgan Gwent Archaeological Trust was consulted during the pre-application stage and it confirmed that it does not require any archaeological mitigation as part of the proposal.

4.1.50 The Councilõs Conservation Officer was consulted during the pre-application stage and confirmed that the proposal would not materially impact upon on the setting of the Transporter Bridge (a Grade 1 listed building) or any other designated historic asset.

4.1.51 In relation to other heritage assets, the application site does not contain any designated assets such as scheduled monuments or listed buildings and the application site is not within a conservation area.

4.1.52 A desk based Heritage Assessment is attached at Appendix 5.

4.1.53 The proposal will not therefore have an adverse impact in respect of archaeological or heritage matters and, as such, it accords with Policies W2, SP9 and CE6.

4.1.54 Flooding ï the submitted Flood Consequences Assessment (Appendix 4) concludes that the proposed development is at low risk of flooding and is appropriate to its location, meeting the requirements of PPW and TAN15.

4.1.55 The proposal will not therefore have an adverse impact with regard to flooding and, as such, it accords with Policies W2, SP3 and TAN15.

4.1.56 Contamination ï A Ground Conditions Summary Report (Appendix 3) has been prepared. This includes a Desk Top Study (DTS) and a Preliminary Risk Assessment (PRA) in relation to the proposed development. These have identified potential low risk to groundwater and surface water

and low to moderate risk to human health. The risk from ground gas to future users of the site is considered to be moderate to high. Elevated concentrations of methane and carbon dioxide have been identified through monitoring on and adjacent to the site. The present structure benefits from an impermeable membrane beneath the footprint. It is considered the proposed development would also require such measures to prevent gas migration.

4.1.57 It is considered that some limited further ground investigation and assessment is required to determine the severity and extent of contamination within the previously un-investigated northern part of the site (currently vacant), so as to determine the risk to human health and environmental receptors.

4.1.58 On the basis the construction is limited to shallow works then the investigation works then this could be limited to a days trial pitting or window sampling and testing. It is proposed that this is undertaken prior to commencement of the development in conjunction with any site investigation work required for design purposes.

4.1.59 With these measures in place the proposal will accord with Policy GP7 and W2 of the adopted Newport Local Development Plan.

4.1.60 Design ï the submitted Design and Access Statement (DAS) (Appendix 1) explains the design considerations that led to the final design of the proposed development. It confirms that the key characteristics of the proposed development are ensuring a design that allows; operational efficiency, a movement strategy based on creating a safe and accessible environment for site vehicles and operatives, ensures the appropriate levels of environmental protection are achieved and incorporates a quality, design that provides an industrial appearance that is fully compatible with its immediate surroundings. The DAS also demonstrates that operational requirements and locational constraints and opportunities have been carefully analysed in the context of the relevant design policies to ensure that the final design achieves best practice.

4.1.61 Accordingly, in terms of design the proposal fully accords with Policies W2 and GP6.

4.1.62 Landscape and visual impact ï the application site is within an area of industrial character and is not located within a Special Landscape Area as defined in the LDP. Indeed, the Councilôs pre-application advice stated that by reason of the scale and industrial nature of the neighbouring buildings, the proposal would not result in a detrimental impact to the visual amenity of the area.

4.1.63 The proposal will not therefore have an adverse landscape impact and, as such, it accords with Policy W2 in this regard.

4.1.64 Amenity ï the current facility has operated at the site for over 10 years without any known issues with regard to amenity (noise, air pollution, odour, dust and emissions) being raised. The surrounding area is industrial in character and whilst there is one residential property on Stephenson Street approximately 90m from the depot the nearest residential areas to the site are Pillgwenlly 600m to the north west, Somerton 1.9km to the north and Lliswerry 2km to the north

east. It is not considered that the proposed development will have an impact on residential amenity.

4.1.65 Furthermore, the operation of the reconfigured and extended depot will be controlled by a new Environmental Permit that will issued by NRW. The Permit will set out environmental standards mainly relating to the control of air and noise emissions, drainage and site management and will ensure that these matters are appropriately managed and monitored.

4.1.66 Having regard to the above, the proposal accords with Policy W2 such that there is no amenity reason why planning permission should not be granted.

4.1.67 Traffic ï The pre-application advice received from the Council confirmed that the proposed one-way circulation on the site and the increase in on-site parking provision would represent an improvement in terms of the way the site operates from a highways point of view.

4.1.68 The increase in HGV traffic as a result of the proposed development is set out in Section 3 of this statement. This confirms that the increase will be negligible and as such the proposal therefore accords with Policies W2 and GP4 and there is no traffic or highways reason why planning permission should not be granted.

4.1.69 Need ï The WG has set strict targets for waste management which in accordance with its strategy to implement the waste hierarchy involves targets aimed at increasing recycling. Section 12 of PPW confirms that planning authorities be supportive of facilities which reflect the waste hierarchy, and confirms that the Collections, Infrastructure and Markets (CIM) Sector Plan requires a move towards a position where disposal and recovery of waste are reduced in favour of high volume source segregated collection followed by reprocessing. There is therefore a need wide ranging and diverse waste infrastructure in order to meet the WGôs aspirations for waste management.

4.1.70 This position is echoed in TAN 21 which confirms that there are clear environmental, economic and social benefits associated with managing waste as a resource and optimising efficiency of use of waste material. It also confirms that the expanding waste management sector can offer job and training opportunities and safeguard existing jobs as a result of cost savings associated with increased resource efficiency. It confirms that recycling should be encouraged and that priority should be given to the development of new infrastructure that promotes high quality, closed loop recycling, or upcycling where feasible, with a focus on dealing with separately collected materials.

4.1.71 The proposal will contribute significantly to increasing recycling in Newport and it therefore accords with national policy on waste strategy within PPW and TAN21 and with Strategic Policy SP20 of the LDP. In addition, the consideration of the detailed criteria contained within Policy W2 which is set out above, confirms that there is no reason why planning permission should not be granted.

5 CONCLUSIONS

5.1.1 The proposed development seeks to reconfigure an existing recycling depot and provide some additional parking and covered segregated waste storage areas to improve the operational efficiency and increase the quantum of recyclable materials that can be dealt with.

5.1.2 The depot will continue to facilitate the WG priority materials glass, paper, cans and plastics as well as textiles, card and food waste and it is estimated that due to the proposed changes the waste throughput of the facility will increase from 14,600 tonnes per annum to approximately 20,800 tonnes per annum.

5.1.3 The proposal will contribute significantly to increasing recycling in Newport and it therefore accords with national waste policy contained within Section 12 of PPW and TAN 21 and Policy SP20 of the Newport LDP, which reflects national waste policy.

5.1.4 In terms of the site itself, Policy W1 of the LDP confirms that waste management is a suitable use of an industrial site such as the application site. In addition, the proposal has employment benefits as it will ensure that those who are currently employed at the facility will be retained in employment and it will also result in the creation of an additional 5ï 6 jobs at the premises.

5.1.5 With regard to the detailed criteria set out in Policy W2 the proposal will not have any unacceptable impacts with regard to ecology and nature conservation, in particular with regard to its proximity to the River Usk SAC and SSSI, nor in relation to archaeology, heritage assets, flooding, design, landscape and visual impact, amenity or traffic generation. Indeed, the proposed one-way circulation on the site and the increase in on-site parking provision would represent an improvement in terms of the way the site operates from a highways point of view.

5.1.6 There is, therefore, no reason why planning permission should not be granted for the proposed development.